



Home Office

## Crown Premises' Fire Safety Inspectorate (CPFSI) COVID-19 Generic Risk Assessment

Fire and Resilience Directorate | 6<sup>th</sup> Floor NW Fry Building

| 2 Marsham Street | London SW1P 4DF

Date of Risk Assessment – 12<sup>th</sup> June 2020

Name -

Signed by -

### Statement of Intent

Everyone needs to assess and manage the risks of COVID 19. Both CPFSI and the employers operating the buildings which CPFSI inspects have a legal responsibility to protect workers and others from risks to their health and safety. This risk assessment addresses the risks of COVID 19 which arise during inspections of occupied buildings by considering the risks of infection transmission and the sensible control measures required to manage them.

Inspections are carried out at premises in which people are working because they cannot work from home. This means that regulatory activity must also be carried out at the workplace and performed in a safe and controlled manner where it is necessary.

The decision to inspect premises will always be based on the correct balance of risk and benefit from that activity and at those premises. It will take into account all relevant information, but inspections will normally only be undertaken where there are indicators of potentially significant risk from fire which could justify potential intervention by the enforcing authority.

CPFSI have been undertaking Desktop Assurance audits during COVID-19, but these do not always provide the necessary level of detail and assurance. It is possible to mitigate the risk to an acceptable level through measures which provide equivalent protection to social distancing and embrace its principles whilst undertaking a physical inspection of a premises.

CPFSI is using face coverings (and by agreement PPE for inspectors who are protecting a vulnerable family member) to enhance the effect of social distancing during its inspections. We are using face coverings to mitigate the effects of inspectors visiting multiple workplaces, which could otherwise

represent a higher risk of transmission of COVID 19 between people in different locations. This also provides for circumstances in which inspectors are temporarily unable to maintain two metres distance from other people while using narrow corridors, passing through security doors, etc. and a further control measure is necessary.

This risk assessment takes into account all current guidance issued by HM Government and the NFCC on working safely during COVID 19 and will be updated where guidance changes.

The purpose of undertaking this risk assessment and implementing the control measures it identifies is to reduce risk to the lowest reasonably practicable level by taking preventative measures, in order of priority.

**The risk assessment is based upon the hazards and necessary control measures for both active and non-active COVID-19 sites.**

RISK	WHO IS AT RISK?	CONTROL MEASURES REQUIRED	WHAT FURTHER ACTION IS NECESSARY?	ACTION BY WHO	ACTION BY WHEN	COMPLETED
Spread of COVID-19 coronavirus	CPFSI inspectors					
<b>1. Impact on inspectors' personal circumstances and wellbeing.</b>						
a. Recognising concerns and worry about bringing COVID-19 home affecting own wellbeing and impact on the family.	CPFSI inspector and family members	One-to-one discussions between inspectors and line management to discuss concerns and impact on your wellbeing.  Adhering to CPFSI 'Business as usual' control measures (contained below) to reduce the risk of contracting COVID-19.	Agreement where necessary to delay an individual's availability for visits on welfare, care responsibility or other relevant grounds			

<p>b. Family life matters, the thought of working away after being confined to their home for a significant period, Example - the impact it could/will have on their children.</p> <p>c. Anxiety or fear of working in an environment which COVID-19 has been prevalent i.e. prisons.</p>	<p>CPFSI inspector and family members</p> <p>CPFSI inspector</p>	<p>Pre-planned conversation prior to sourcing volunteers from the inspection team when a site visit is necessary</p> <p>Pre-planned conversation prior to sourcing volunteers from the inspection team when a site visit is necessary</p>	<p>Set out a PPE plan for each visit in liaison with a Government department in conjunction with appointment letter.</p>			
<p>d. Inspectors contracting COVID-19 whilst working from home</p> <p>e. Exposure to inspectors who maybe more</p>	<p>CPFSI inspectors</p> <p>CPFSI inspectors</p>	<p>Inspectors may also contract the virus in the community. You must report any clinical signs of infection to the Team Leader immediately and must begin an appropriate length of self-isolation before returning to work. Staff are also expected to comply with the national social distancing guidance outside their household to reduce the risk of contracting the virus.</p> <p>Staff excluded from being involved in any inspection activity. See (b) above.</p>	<p>These staff are required to discuss this with their Team leader so that alternative working arrangements can be put in place</p>			

vulnerable to COVID-19		<p>Staff who are classified as more vulnerable to severe illness as a result of Covid-19 and/or who have recognised medical conditions are not required to attend. In addition, national guidance indicates that some staff may also be at additional risk due to their caring responsibilities or family situations.</p>				
f. To determine if an individual has previously been exposed to or has some immunity to SARS-CoV-2 (COVID-19)	CPFSI inspectors	<p>Serology (Antibody) point of care test to identify if an inspector has been previously exposed or some immunity to COVID-19 has been established.</p>	<p>Inspectors should take antibody tests as and when available in line with Government advice.</p>			
g. Impact on mental health during COVID-19	CPFSI inspectors	<p>Management will promote mental health &amp; wellbeing awareness to staff during the Coronavirus outbreak and will offer whatever support they can to help</p> <p>Reference -  <a href="https://www.mind.org.uk/information-support/coronavirus-and-your-wellbeing/">https://www.mind.org.uk/information-support/coronavirus-and-your-wellbeing/</a>  <a href="http://www.hseni.gov.uk/stress">www.hseni.gov.uk/stress</a></p>	<p>Regular communication of Home Office employee assistance helpline (horizon) and open-door policy for those who need additional support.</p>			

<b>2. Travelling to inspections</b>						
a. Use of public transport to travel to inspection	CPFSI inspector	Using public transport presents additional risk of infection. Inspectors should reduce this risk by using their own cars where possible, or - for colleagues who do not drive - arranging for a taxi with a dividing screen between driver and passenger to take them from their home to the establishment). Decisions on visits to investigate or inspect will take into consideration where inspectors live and where they are able to travel to in a day, to eliminate the need for overnight stays in a hotel.				
b. Refuelling vehicle	CPFSI inspector	Where possible, staff should use garages that offer a 'pay at pump' option, wear gloves (where possible) and should wipe the handle of the petrol pump before use. While balancing the need to refuel on multiple occasions, staff should aim to keep the refuelling costs below the limits permitted for contactless				

c. Use of hotels	CPFSI inspector	<p>payment (most banks have raised the limit on debit and credit cards to £45 to reduce the need to use keypads to make payments). Staff should sanitise their hands when they have finished refuelling.</p> <p>Hotels will be used during visits when it is not practical for an inspection to be undertaken by a sufficient number of inspectors through return travel from home on the same day.</p>				
<b>3. Pre-inspection</b>						
a. Adequate social distancing measures are unavailable for controlling the risk of transmission of COVID-19	CPFSI inspector	<p><b><u>Inactive site</u></b></p> <p>CPFSI will make prior contact with the premises to:</p> <ol style="list-style-type: none"> <li>1. Provide our COVID-19 risk assessment for inspections; and</li> <li>2. Confirm that it is an Inactive COVID site; and</li> <li>3. Confirm that suitable COVID-19 safe working procedures are in place at the premises to be inspected; and</li> <li>4. Confirm any additional procedures for the protection of people who are shielding at the premises; and</li> <li>5. Obtain a copy of the COVID-19</li> </ol>				

	<p>CPFSI inspector</p>	<p>workplace risk assessment for the premises in order to ensure that the respective COVID-19 control measures are aligned.</p> <p>The visit will not go ahead on the basis of the control measures in this risk assessment if:</p> <ol style="list-style-type: none"> <li>1. Enquiries establish that it is an Active COVID-19 site (i.e. any occupants are self-isolating or have symptoms of COVID-19); or</li> <li>2. Suitable COVID-19 safe working procedures in line with <a href="https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres">https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres</a> are NOT in place.</li> </ol> <p>Where it is understood that COVID-19 is not active and present, the minimum PE (protective equipment) to be worn by inspectors where social distancing cannot be achieved is a surgical face mask and nitrile gloves.</p> <p>CPFSI expects the person accompanying the inspector to be wearing the same level of PE and will offer to provide that PE if it is not already available for that person to use.</p>				
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<p>b. Social distancing measures are inadequate for controlling the exposure to COVID-19.</p>		<p><b><u>Active site</u></b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>• a fire-related incident has resulted in a fatality (or multiple fatalities); or</li> <li>• a fire-related incident has resulted in significant fire-related injuries being sustained by one or more persons; or</li> <li>• intelligence has been received that suggests that a significant failure with one or more general fire precaution measures which will place one or more persons at risk of death or serious injury in case of fire;</li> </ul> <p>has been confirmed at an active COVID-19 site, CPFSI will undertake an investigation or themed inspection in line with our standard policy approach.</p> <p>The initial stages will be undertaken remotely from the premises in order to</p>	<p>Physical themed inspections and investigations will be conducted at premises where occupants are confirmed to be self-isolating or have symptoms of COVID-19, where CPFSI inspectors assess that the existing fire safety measures may not avoid persons being placed at risk of death or serious injury in case of fire and that the involvement and contribution of CPFSI is necessary for a successful and timely solution to be implemented.</p> <p><b>In all circumstances, the decision to inspect or investigate at an active COVID-19 premises will be made following a conversation with the Chief Inspector or team leader.</b></p>			
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limit exposure time on-site and to determine the need to visit to an active COVID-19 site.

Where it appears from dialogue and the information provided that the risk of injury or death remains and that the involvement and contribution of CPFSI is needed to achieve a successful solution, then we will conduct an investigation or themed inspection at an active COVID-19 site.

Once an investigation or inspection has been deemed necessary, CPFSI will make prior contact with the premises to:

1. Provide our risk assessment for inspections at active COVID-19 sites; and
2. Confirm that suitable COVID-19 safe working procedures are in place at the premises to be inspected; and
3. Obtain a copy of the COVID-19 workplace risk assessment for the premises in order to ensure that the respective COVID-19 control measures are aligned.

Note - The visit will not go ahead until the control measures in the

	<p>CPFSI inspectors</p>	<p>respective risk assessments have been aligned.</p> <p>All inspectors have been provided with a full set of protective equipment (PPE) including-</p> <ol style="list-style-type: none"> <li>1. Type 2 Fluid Repellent Surgical Face Masks</li> <li>2. Nitrile Gloves</li> <li>3. Coveralls - Disposable</li> <li>4. One pair of goggles</li> <li>5. 2 x 250ml Germ Killa hand sanitiser</li> <li>6. Cleaning cloths for surfaces or goggles</li> <li>7. Clinell universal wipes</li> <li>8. Clinical waste sacks.</li> </ol> <p>CPFSI will use social distancing, hand cleansing and PPE as necessary to mitigate the risk of infection transmission to inspectors and through them to people at other premises which they visit.</p> <p>Note – Where the occupier requires a higher level of PPE subject to their risk assessment, inspectors will comply with their request.</p> <p>Source trousers with leg pockets (Cargo trousers) to carry spare</p>	<p>Inspectors to be provided with FFP2 or N95 face masks for active site.</p>			
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b. Inadequate storage for spare PPE	CPFSI inspectors	protective equipment (PE) i.e. hand gel, gloves etc.				
c. Incorrectly Donning and Doffing of PPE	CPFSI inspectors	Correct Donning and Doffing of PPE before and after the inspection, see <a href="#">CPFSI wearing and removing PPE guidance note</a>				
d. Disruption caused by the perceived level of PPE provided for the different groups present	CPFSI inspectors	Inspectors should be aware and adhere to guidance where there is the potential to cause disruption during an inspection i.e. the impact on stability within a custodial environment, where the level of PPE for their staff and what is afforded to prisoners is significantly less than that provided to inspectors.				
e. Potential for exposure to COVID-19 (Clothing).	CPFSI inspectors	CPFSI aims to prevent carrying the virus into premises by initiating specific precautions on arrival. Inspectors should wear smart casual clean clothing in the establishment, changing after the inspection prior to entering your vehicle to travel home. When returning home, clothing worn during the visit should be laundered at the maximum approved temperature (60 degrees centigrade) to prevent germs from spreading.  Inspectors will only take a notepad, pen, RAG proforma, PPE and hand				

f. Potential for exposure to COVID-19 (stationary and lap		sanitiser into visits. Wipe down before and after an inspection using disinfectant spray.				
<b>4. Inspection (reducing the spread of COVID-19)</b>						
a. Adequate social distancing measures are unavailable for controlling the risk of transmission of COVID-19	CPFSI inspectors	<p><b><u>Inactive site</u></b></p> <p>The visit will be halted if it becomes known that:</p> <ol style="list-style-type: none"> <li>1. It is an Active COVID-19 site (i.e. occupants are self-isolating or have symptoms of COVID-19); or</li> <li>2. Suitable COVID-19 safe working procedures in line with <a href="https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres">https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres</a> are NOT in place or NOT being implemented effectively on the ground.</li> <li>3. In the event of a PE failure in conjunction with inadequate social distancing measures in</li> </ol>	<p>Inform team leader or Chief Inspector of decision to halt or postpone the inspection.</p> <p>Confirm the need to notify HSE of the circumstances.</p> <p>Inspector to notify the Home Office</p>			

<p>b. Adequate social distancing measures are unavailable for controlling the risk of transmission of COVID-19</p>	<p>CPFSI inspectors</p>	<p>place during an inspection, inspectors will remain at home and not undertake a further inspection for 14 days.</p> <p>4. If it emerges that COVID-19 is/was active at premises which have been inspected using the control measures set out by this risk assessment, the inspector should self-isolate for 14 days following that inspection.</p> <p>Inspectors will seek to apply the principles of social distancing to the maximum extent that it is possible.</p> <ol style="list-style-type: none"> <li>1. All activity relating to the inspection which can be carried out remotely, in open air or by telephone will use those methods.</li> <li>2. For all other inspection activity inspectors will apply 2-metre social distancing to the maximum extent it is possible.</li> <li>3. Inspectors will enhance the protection provided by social distancing and mitigate risk where 2-metre separation is temporarily impossible through the use of face coverings and nitrile gloves during the inspection of the building.</li> <li>4. Inspections can be programmed to take place outside normal working</li> </ol>	<p>An advance briefing and a de-briefing will be carried out using the optimal social distancing approach to meet the business need.</p> <p><a href="https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19">https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19</a></p> <p><a href="https://www.gov.uk/government/publications/staying-alert-and-safe-social-distancing">https://www.gov.uk/government/publications/staying-alert-and-safe-social-distancing</a></p>			
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		<p>hours or during periods of low occupancy.</p> <ol style="list-style-type: none"> <li>5. The assessment of fire safety management will be carried out remotely.</li> <li>6. Inspection activity within the building will be limited to a physical assessment of the building fire safety measures.</li> <li>7. Inspections will involve one person only from the site to enable the physical inspection of the building.</li> <li>8. Inspectors will observe social distancing measures, one-way systems, floor signage etc. within the building.</li> <li>9. Inspectors will change into fresh clothes between inspections.</li> <li>10. Inspectors will follow HM Government advice on hand-washing frequently, using appropriate opportunities during the inspection.</li> <li>11. Inspectors will bag and remove from the premises all items that they have used during the inspection.</li> </ol>	<p>See hand washing guidance.  <a href="https://www.nhs.uk/live-well/healthy-body/best-way-to-wash-your-hands/">https://www.nhs.uk/live-well/healthy-body/best-way-to-wash-your-hands/</a></p> <p>At the end of the visit used PE (face coverings and gloves) should be put in a plastic rubbish bag (provided) and tied. The plastic bag should then be placed in a second bag and tied. Upon arriving home, the waste should be stored safely and kept away from children. You should not put your waste in communal waste areas or your private bin until it has been stored for at least 72 hours.</p> <p>Source of information Public Health England</p>			
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<p>a. Failure of PPE or accidental exposure to COVID-19</p> <p>b. Exposure COVID-19 due to inadequate control measures or arrangements on site</p>	<p>CPFSI inspectors</p> <p>CPFSI inspectors</p>	<p><b>Active site</b></p> <p>In the event of a PPE failure or an inspector suffers symptoms of COVID-19 following an inspection, the inspector will self-isolate for 14 days following that inspection.</p> <p>Inspectors will enhance the protection provided by social distancing and mitigate risk through the use of full PPE protection during the inspection of the building.</p> <p>Correct Donning and Doffing of PPE during (where required in a prison leaving a hot zone), and after the inspection, see <a href="#">CPFSI wearing and removing PPE guidance note</a></p> <p>Additional control measures -</p> <ol style="list-style-type: none"> <li>1. All activity relating to the inspection which can be carried out with full social distancing, in open air or by telephone, will use those methods.</li> <li>2. The assessment of fire safety management will be carried out remotely.</li> <li>3. Where an inspection/investigation has been deemed necessary, the</li> </ol>	<p>Notify team leader or Chief Inspector</p> <p><a href="https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19">https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19</a></p>			
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minimum number of inspectors required will enter the premises to complete tasks that are specific to the investigation, concern or complaint.

4. Inspections will involve the minimum number of persons from the site to enable the physical inspection of the building.

5. Inspectors will observe social distancing measures, one-way systems, floor signage etc. within the building.

6. Inspectors will follow HM Government advice on hand-washing frequently, using appropriate opportunities during the inspection.

7. Inspectors will bag and remove from the premises all items that they have used during the inspection. If suitable disposal facilities are available dispose on site at the agreement from the responsible person.



<p>f. Inspection of prison and potential for exposure to COVID-19</p>	<p>CPFSI inspectors</p>	<p><b>Prisons</b></p> <p>We will adhere to the MOJ and private prison provider risk assessment and safe operating procedures for specific control measures being required during a prison visit.</p> <p>Establishments are required to designate three separate units:</p> <ul style="list-style-type: none"> <li>a. a Reverse Cohorting Unit for the temporary separation for newly received prisoners;</li> <li>b. Protective Isolation Unit for the temporary isolation of symptomatic prisoners; and</li> <li>c. a Shielding Unit for the temporary isolation of those prisoners within the NHS England vulnerable persons cohort for 12 weeks.</li> <li>d. Segregation units require a minimum of face masks to be worn by prison officers.</li> </ul> <p>Symptomatic prisoners may also be isolated in their cells. Inspectors should pay attention to any signage or briefing notes that identify areas where prisoners may be isolated due</p>	<p><a href="https://www.gov.uk/government/publications/covid-19-prisons-and-other-prescribed-places-of-detention-guidance/covid-19-prisons-and-other-prescribed-places-of-detention-guidance">https://www.gov.uk/government/publications/covid-19-prisons-and-other-prescribed-places-of-detention-guidance/covid-19-prisons-and-other-prescribed-places-of-detention-guidance</a></p> <p>Refer to HMPPS national framework for prison regimes and services. <a href="https://www.gov.uk/government/publications/covid-19-national-framework-for-prison-regimes-and-services">https://www.gov.uk/government/publications/covid-19-national-framework-for-prison-regimes-and-services</a></p>			
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	<p>to COVID-19 and exclude themselves from contact to prevent cross infection.</p> <p><b>Inspectors should only enter these cohorted units for a specific task related to the inspection/investigation.</b></p> <p>There may be exceptional circumstances in which we need to interview a prisoner, in this case, we would need to look at communication options such as (over the phone). Inspectors will not come into direct contact with a prisoner to communicate or enter a cell.</p> <p>A dynamic assessment will be carried out prior to entering residential areas to determine the need to draw keys.</p> <p>We will draw keys based upon the advice provided in relation to the sterilising of keys before and after use.</p> <p>If the establishment requires a search procedure prior to entering or leaving, additional PPE may be required, and supplied by the organisation.</p> <p>In general, alcohol-based hand gels are not permitted to be taken into a</p>	<p>Inspectors may be offered the opportunity to carry hand gels into a premises subject to prior approval from the Governor/Director.</p>			
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<p>a. Travel, rest period or breaks</p>	<p>CPFSI inspectors</p>	<p>custodial environment. Procedures are in place to ensure inspectors following strict guidelines for applying the gel before entering all areas within the prison (Hand gel stations).</p> <p><b><u>Generic and post inspection</u></b></p> <p>Inspectors are encouraged to bring their own food and appropriate utensils, and to wash their hands thoroughly before eating all food, including fruit and sweets. All items taken home from the establishment should be thoroughly washed and packed away after use.</p>				
<p>b. Providing a narrative brief or outcome in a small room or unfenestrated area.</p>	<p>CPFSI inspectors</p>	<p>Inspectors should be careful when entering areas where air flow is limited example boiler rooms, small offices or rooms. Encourage people to talk in open spaces. If possible, open the window or door to allow air movement.</p>				
<p>c. Maximum duration of inspection to limit exposure</p>	<p>CPFSI inspectors</p>	<p>Where possible out of hours inspection to reduce the exposure time. Avoid all conversation except as necessary to facilitate the visit.</p>				

d. Possible infection transmission during inspection	CPFSI inspectors and other persons on site	Inspectors and senior person on site should each report to the other party if a person who is present during the inspection develops COVID-19 within 14 days of the inspection date.				
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