



**Annual Fire Safety  
Report**  
**April 2020 to March 2021**  
**to**  
**NHS Lanarkshire Board**

**Prepared for:**  
**Director of Planning, Property and Performance**  
**by the**  
**General Manager, Property and Support Services Division**

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## 1 Executive Summary

This executive summary provides highlights from the Annual Fire Safety Report, covering the period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021.

### 1.1 COVID 19 Pandemic

The COVID 19 pandemic has required NHS Lanarkshire (NHSL) to alter many aspects of how we conduct routine business and this, in turn, has impacted on fire risk management.

### 1.2 Statutory Enforcement Authority, Scottish Fire and Rescue Service, (SFRS), Responsibilities and Powers

This report details the responsibilities and powers under current Fire Safety Legislation of SFRS as the Enforcing Authority for Fire Safety.

### 1.3 Report Statistics

This report includes yearly statistics on:

- Fire Incidents.
- Unwanted Fire Alarm Signals (UFAS).
- Fire Risk Assessments.
- Statutory Compliance Notices issued by the Enforcing Authority.
- Attendance by staff at Fire Safety Awareness Training.

### 1.4 Fire Incidents

During the reporting period 2020/21 there was one actual fire incident that involved injury to persons and fitted the criteria for reporting to Scottish Government which also instigated a Significant Adverse Event Review. The total number of reported fire incidents for the reporting period 2020/21 totalled 141. This represents a decrease of 18% on the 172 reported incidents for reporting period 2019/20. Analysis concluded that the decrease is mainly due to the reduced footfall within the 3 acute hospitals as a result of the COVID 19 pandemic.

It should be noted that the total number of fire incidents quoted may not represent a full and accurate figure for reporting period 2020/21. After cross referencing the number of fire alarm activations recorded by University Hospital Monklands (UHM) Switchboard Staff with the number of fire incident Datix Reports, it was estimated that 10 fire incidents which occurred at UHM during reporting year 2020/21 were not recorded on the Datix Data System, as required by section 4.10 of NHSL Fire Safety Policy. This is the third successive year this issue has been identified. It is estimated that in total approximately 30% of all fire incidents which occurred at UHM in the last 3 reporting periods have gone unreported. NHSL Fire Safety Team have raised the issue with the UHM Fire Safety Group and NHSL Fire Safety Group advising it is a matter of concern as unreported incidents are not investigated, corrective action is not taken and it leaves the Board open to criticism from the Enforcing Authority.

The total number of reported fire incidents included:

- 124 UFAS;
- 4 Actual Fire Incidents of which 1 was considered to be of significant interest;
- 4 False Good Intent;
- 9 False Malicious Intent.

## **1.5 Fire Risk Assessments (FRAs)**

Currently there are 439 FRA areas which are completed and recorded on the Estates Asset Management System (EAMS). During this reporting period 2020/21, 100 FRAs were reviewed by NHSL Fire Safety Advisors, as detailed in the Fire Safety Annual Work Plan. Although the total number of audits planned was achieved, not all targeted areas were reviewed due to access restrictions applied in many areas as a result of COVID 19.

## **1.6 Planned Fire Safety Works (2020/21)**

A total of circa £1,091,000 has been expended on Fire Safety Works in the reporting period 2020/21. This funding was utilised to address significant risks recorded in EAMS. This funding was mainly targeted at the upgrading of fire doors and fire compartmentation within primary care premises and the continued upgrading of fire compartmentation and improvements to the fire warning and detection system at UHM.

## **1.7 SFRS Fire Safety Compliance Audits**

During this reporting period 2020/21 SFRS conducted 12 Fire Safety Audits. This is a reduction in number of Fire Safety Audits normally conducted annually by SFRS Enforcement Officers in NHSL Premises and was due to the SFRS Annual Fire Safety Routine Audit Plan for 2020/21 being temporarily suspended due to COVID 19. None of the audits resulted in formal enforcement action being taken by SFRS against NHSL. Enforcements Officers noted only issues of minor deficiency for all other premises.

## **1.8 Fire Safety Training**

During the reporting period 2020/21 67% of staff participated in General Fire Safety Training. This figure indicates a 7% decrease on the number of staff who completed General Fire Safety Training during reporting period 2019/20.

## **1.9 Fire Safety Groups**

The management and reporting of performance on fire safety compliance continues to be by a structured set of Fire Safety Groups which meet on a quarterly basis. However, as a result of operational pressures across the organisation due to the COVID 19 Pandemic, Senior Site Responsible Managers have found difficulties convening meetings on a routine basis and several Local Fire Safety Group Meetings required to be cancelled. The impact of Fire Safety Group meetings being cancelled was alleviated by NHSL Fire Safety Advisors being fully involved in Local Bronze Command Groups which enabled matters of concern relating to fire safety to be raised with the relevant management teams.

In the new reporting period, the overall governance structure of fire safety will be revised by requiring Local Fire Safety Groups to report on performance relative to the 3 Fire Safety Key Performance Indicators to NHSL Fire Safety Group. This information in turn will inform the Quarterly Corporate Management Team Fire Safety Performance Report and the Boards Annual Fire Safety Report.

## **1.10 Reduced Level of Operational Response by SFRS**

SFRS in May 2020 reduced the level of operational response to all non-sleeping risk premises as part of their response plan to the COVID 19 Pandemic. This resulted in the level of operational response to all Community Health Centers (CHC) being reduced from 2 fire appliances to one in the event of an automatic fire alarm activation. Despite NHSL continuing to raise an objection to the reduced level of operational response, SFRS position remains unchanged. The NOF has advised NHSL Fire Safety Group that Senior Site Responsible Managers (SSRM) will require to introduce suitable arrangements to identify the cause of a fire alarm activation and in the event of an actual fire provide a backup call to SFRS to attract full operational attendance.

Although this report reflects activities within the reporting period 1st April 2020 to 31st March 2021 the Director of Planning, Property and Performance would bring to the Boards attention that in July 2021 SFRS began a public consultation process to formally consult with stakeholders on a permanent mobilising criterion for automatic fire alarm activations which will include healthcare premises. The Chief Executive has formally objected to the proposals made in their consultation document Time for Change Options for responding to Automatic Fire Alarms. The objections made by the Chief Executive are similar to that raised by all NHSS Boards.

### **1.11 Fire Risk Management Statement of Assurance**

The requirement for SSRM to submit a Fire Risk Management Annual “Statement of Assurance” for premises for which they have fire safety responsibility has now been replaced with a new reporting methodology which will monitor fire safety performance on an ongoing basis by NHSL Corporate Management Team.

### **1.12 Fire Safety Policy and Procedures**

A review and revision of NHSL Fire Safety Policy Version 10 was commenced in March 2021. The revised policy document will be circulated to all stakeholders for consultation. Following the consultation period, Version 11 of the policy will be finalised for approval and implementation.

During the reporting period 20/21 two new fire safety procedural documents were approved and implemented by NHSL Fire Safety Group namely;

- Safe Use of Oxygen – Oxygen Monitoring Procedure No IMS 342
- Fire Safety Performance Monitoring Procedure No IMS 343

### **1.13 Fire Safety Control Book (FSCB)**

The current total of FSCBs is 262. During reporting period 2020/21 a total of 57 FSCBs were audited by NHSL Fire Safety Team. This is 11 less than the target set in the Fire Safety Annual Work Plan. The shortfall is due to Fire Safety Advisors being unable to gain access to wards as a result of COVID 19 infection control measures.

The new reporting methodology detailed in item 11 below, which will monitor fire safety performance on a continual basis, will provide a level of governance over the outcomes of FSCB audits to ensure that deficiencies are rectified within reasonable timescales by the issue of Corrective Action Plans to the SSRM which will detail the deficiencies, actions to resolve and time scales for completion.

### **1.14 Fire Safety Work Plan 2021/22**

The NOF has developed an Annual Fire Safety Work Plan for reporting period 2021/22. (Refer to Section 12 main report)

## 2 Introduction

This report has been prepared by the General Manager Property and Support Services Division, in her capacity as Nominated Officer Fire (NOF), on behalf of the Director of Planning, Property & Performance (Executive Lead for Fire Safety Compliance).

The report provides details of the management and reporting on fire safety activities across NHSL in the reporting period from 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021, including statistics on:

- UFAS;
- Fire Incidents;
- Fire Risk Assessments;
- Statutory Compliance Notices issued by the Enforcing Authority;
- Attendance by staff at Fire Safety Training

## 3 COVID 19 Pandemic

The COVID 19 pandemic has required NHSL to alter many aspects of how we conduct routine business and this, in turn, has impacted on fire risk management.

The pandemic has presented many fire safety challenges and fire risk factors previously never encountered before by Nursing Staff, Hospital Management Teams, Fire Safety Advisors and Maintenance Teams. In particular, the number of high dependency patients requiring to be located in areas not specifically designed for the treatment and care of this profile of patient, along with the unprecedented level of oxygen being administered on a continual basis.

Although the pandemic has presented challenging circumstances for NHSL Board and its staff, who have been required to work under very difficult circumstances, it was important that managers and staff did not assume that these challenging circumstances excused them from their legal duties as detailed under the Fire (Scotland) Act 2005. Although the legal obligations remain unchanged and undiminished, the nature of life and how NHSL does its business has changed so significantly that new and previous issues not considered to be a risk are emerging and being identified as matters of concern. In order to meet the challenges these risks present, new fire safety guidance and procedures have required to be developed and existing guidance and procedures will need to be reviewed to ensure they remain 'fit for purpose'. Careful consideration and good management are required with regards to how we manage and balance the risks of fire, along with the other risks the pandemic continues to present, as often the measures to mitigate and control both can conflict and have a detrimental impact on each other.

It is essential that fire safety arrangements are reviewed on a regular basis and where significant changes to working routines, processes, or adaptations to buildings are made, the necessary additional control measures should be implemented. Of the many aspects that required to be considered relative to additional fire risk through the pandemic, increased storage of equipment and materials, including more frequent deliveries and undesignated areas being used to accommodate storage, has been, and continues to be a particular challenge.

Social distancing control measures needed to be reviewed to ensure they did not adversely affect fire safety measures, including obstructing means of escape routes, obscuring emergency exit signage, or affecting the performance of fire alarm and detection systems.

Fortunately, those who work in fire safety, such as fire safety advisors, fire alarm engineers and maintenance teams, were categorised as key workers which meant they were permitted to continue working and maintain fire safety systems, equipment and procedures. Crucially,

it was important to maintain a focus on fire safety in order to keep patients, staff, visitors and assets safe.

#### **4 Statutory Enforcement Authority- SFRS Responsibilities and Powers**

SFRS is the Enforcing Authority for fire safety across Scotland. NHSL continues to deal with locally based Fire Safety Enforcement Officers and Operational Fire Crews.

The Fire Scotland Act 2005 and The Fire Safety (Scotland) Regulations 2006, provide a National Framework setting out Government expectations of the Fire & Rescue Service enforcement, regarding fire safety provision required for all non-domestic premises.

The Fire Scotland Act 2005 and The Fire Safety (Scotland) Regulations 2006, require all fire safety requirements to be based on fully documented Fire Risk Assessments being available for all premises managed or occupied by NHSL.

Powers of the Enforcement Officers, in relation to premises for which they have enforcement responsibilities, are listed in section 62 of the Fire Scotland Act 2005 and are summarised below.

Enforcement Officers may do anything necessary to allow them to enforce their fire safety duties, including;

- Entering premises for inspection at any reasonable time, or at any time if the officer has reason to believe that the situation is dangerous;
- Requesting information, records etc., or assistance from any persons with fire safety duties;
- Inspecting, copying or removing any relevant documents from the premises;
- Carrying out any inspections, measurements or tests considered necessary on the premises or any article or substance found on the premises;
- Taking samples of any article or substance found on the premises;
- Dismantling articles found on premises which appear likely to cause danger from fire;
- Taking possession of an article for purposes of examination or use as evidence.

If the Enforcing Authority is dissatisfied with the outcome of the Fire Safety Risk Assessment, or the action taken, or the fire safety measures in place, it has the power to take action which could be;

- Informal action;
- Formal enforcement action which could result in the issue of a Statutory Enforcement Notice that requires specified action to be taken;
- In extreme cases, a Statutory Prohibition Notice may be issued that prohibits/restricts the use of all or part of the premises until specified matters are remedied;
- Reporting the matter for prosecution.

Failure to comply with a notice issued by the Enforcing Authority or placing persons at risk by failing to carry out any duty imposed by fire safety law is an offence.

If the premises pose a serious risk to persons, in respect of harm caused by fire, the authority may issue a Prohibition Notice prohibiting or restricting the use of the premises. Additionally, if the premises posed such a risk if particular changes were made to the premises, the authority may issue an Alterations Notice that obliges the recipient to inform the enforcing authority before making specified changes to the premises.

SFRS crews will visit premises to familiarise themselves with them in the event they are called to a fire in the premises. This type of visit is unlikely to include an assessment of compliance with fire safety law. The fact that a fire and rescue service visit has taken place should not be interpreted as an endorsement of fire safety measures and procedures being applied in the premises.



## 5 Performance

### 5.1 Fire Incidents

Reported Fire Incidents 1 <sup>st</sup> April 2020 – 31 <sup>st</sup> March 2021								
	Hair/myres	Monk/lands	Wishaw	Stone/house	Corp. Serv.	North HSCP	South HSCP	Total
Unwanted Fire Alarm	32	20	31	3		22	16	124
Actual Fire Incidents	2	0	1		1*			4
False Good Intent	3	0				1		4
False Malicious Intent	3	1	4				1	9
<b>Total No of Incidents</b>	<b>40</b>	<b>21</b>	<b>36</b>	<b>3</b>	<b>1</b>	<b>23</b>	<b>17</b>	<b>141</b>
UFAS Breakdown by Cause								
Burnt Food	4	1	6	1		2	2	16
Smoking	7		5			1	2	15
Steam	10		4	1		2	3	20
Aerosol Spray	3	2	4				1	10
System Faults	2	6	1			4		13
Accidental	3	2				3	5	13
Fumes								0
Dust		2						2
Water ingress	1							1
Unknown	1	4	4			9	1	19
Accidental Contractor	1	3	7	1		1	2	15

\*Incident occurred in staff members home whilst working from home

The total number of Fire Incidents reported for the year 2020/21 was 141 This includes the following categories, UFAS, Actual Fire Incidents, Fires of Significant Interest, False Actuation of the fire alarm system due to Malicious Intent, False Actuation of the fire alarm system due to Good Intent. The total represents a decrease of 18% on the 172 reported incidents during 2019/20.

The table above provides a comparison of the numbers of fire incidents across the 3 Acute Hospital sites, Corporate Services and North and South Health & Social Care Partnerships Operating Divisions along with the general classification of the cause of fire alarm activations.

It should be noted that the total number of fire incidents quoted may not represent a full and accurate figure for reporting period 2020/21. After cross referencing the number of fire alarm activations recorded by UHM Switchboard Staff with the number of fire incident Datix Reports, it was estimated that 10 fire incidents which occurred at UHM during reporting year 2020/21 were not recorded on the Datix Data System, as required by section 4.10 of NHSL Fire Safety Policy. This is the third successive year this issue has been identified. It is estimated that in total approximately 30% of all fire incidents which occurred at UHM in the last 3 reporting periods have gone unreported. NHSL Fire Safety Team have raised the issue with the UHM Fire Safety Group and NHSL Fire Safety Group advising it is a matter of concern as unreported incidents are not investigated, corrective action is not taken and it leaves the Board open to criticism from the Enforcing Authority.

#### Notes

- Number of Incidents: relates to cumulative total of all reported fire incidents, which occurred.
- Unwanted Fire Alarm Signals (UFAS): relates to an avoidable actuation of the Fire Warning and Detection System.
- Fire: relates to an incident that involved actual fire and smoke and had the potential to cause damage to property and affect Business Continuity.
- Malicious: relates to a false operation of the Fire Warning and Detection System when it was known there was no fire or suspected fire.
- Good Intent: relates to a false operation of the Fire Warning and Detection System when there was a genuine belief that a fire had occurred.

### **5.1.1 Unwanted Fire Alarm Signals (UFAS)**

The term Unwanted Fire Alarm Signal is used by SFRS to describe any actuation of an automatic fire alarm system which is not the result of an actual fire and was considered to be avoidable, (not including false actuations due to malicious or good intent).

The number of UFAS that SFRS attend is one of the KPI's used to measure the effectiveness of SFRS Demand Reduction Strategy.

NHSL recognises the importance of this KPI and has demonstrated a continued commitment through its joint working with SFRS to reduce the level of UFAS, as far as is reasonably practical.

The NHSL Fire Safety Groups monitor the number of UFAS, examine trends and undertake the appropriate preventive actions as considered necessary and UFAS activity is discussed as a standing agenda item at NHSL/ SFRS Joint Partnership meetings.

During reporting period 2020/21 the NHSL/SFRS Joint UFAS Reduction Groups for NHSL acute sites were temporarily suspended due to issues relating to COVID 19. Following both organisations being established on Microsoft Teams the aim is to re-establish the UFAS groups meetings early in the new reporting period.

The number of UFAS reported for 2020/21, totalled 124. This represents a decrease of 19% on the figure, (153), reported in 2019/20. Analysis of UFAS activity would suggest the decrease is mainly due to the reduced footfall within the three acute hospitals during the pandemic. The link between human activity and the level of UFAS is well recognised. Although an increase in UFAS activity is predicted in the new reporting period as the acute sites gradually move to providing a normal service, staff will continue to work towards achieving a downward trajectory.

NHSL's efforts to reduce the overall number of UFAS across all NHSL sites will continue by:

- investigating the cause of all alarm activations,
- implementing appropriate corrective action in an attempt to avoid reoccurrence,
- Continue to highlight the issue at site fire safety group meetings and NHSL fire safety group meetings.

### **5.1.2 Actual Fire Incidents**

A total of 4 Actual Fire Incidents were reported and investigated during reporting period 2020/21. One of the incidents were considered as being of significant interest and met the criteria to be reported to Scottish Government.

### **5.1.3 Summary of Actual Fire Incidents**

- 12<sup>th</sup> April 2020 Ward 2 University Hospital Wishaw (UHW): Patient set fire to a quantity of paper within a toilet. The incident did not result in any fire damage or injury. SFRS attended and inspected the area but took no firefighting action. The patient was evacuated from the area.

- 7<sup>th</sup> July 2020 Critical Care Unit University Hospital Hairmyres (UHH):  
Fire occurred in a microwave oven. Food was left unattended which overheated and ignited. Fire was contained to oven. The incident did not result in any fire damage or injury. SFRS attended and inspected the area but took no firefighting action. The oven was removed and replaced.
- 24<sup>th</sup> September 2020:  
Staff member working from home was using a laminator when it began to issue smoke. Laminator was isolated and removed to outside. SFRS were not called and no firefighting action was required. General Home Fire Safety Advice was circulated.

#### 5.1.4 Summary of Actual Fire Incidents of Significant Interest

There was 1 Actual Fire Incident of Significant Interest reported during the reporting period 2020/21. The premise involved was;

- 29<sup>th</sup> October 2020 Ward 1 UHH:

Fire occurred in patient room due to defect in an air conditioning unit. Fire was mainly contained to the unit. The materials used in the construction of the unit resulted in the room very quickly becoming heavily smoke logged and smoke spread into the corridor and adjacent rooms. Staff experienced very high temperatures within the room of origin and were faced with a very challenging situation. Total of 3 wards required to be evacuated. One patient was unable to be evacuated from the room of origin and required to be rescued by SFRS Fire Crews. One patient and one member of staff sustained burns and several members of staff were treated for smoke inhalation. SFRS Crew were in attendance at the incident for around 7 hours.

The circumstances of the incident were investigated by NHSL Fire Safety Team and a report was submitted to the Executive Lead for Fire Safety. The incident met the criteria requiring it to be reported to Scottish Government as persons sustained injuries, considerable damage was caused to the building and equipment and business continuity was affected.

The seriousness of the incident also instigated a Significant Adverse Event Review which has been concluded and made a number of recommendations with regards to lessons learned. The recommendations are now being progressed by the relevant Management Teams.

#### 5.1.5 Fire Incidents 2015/16 to 2020/21

The table below provides a comparison of the number of incidents recorded across NHSL over a six-year period from 2015/16 to 2020/21.

Fire Incidents 2015/16 to 2020/21						
	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Unwanted Fire Alarms	174	179	147	116	153	124
Actual Fire Incidents	16	14	10	9	9	4
False Good Intent	3	6	8	5	2	4
False Malicious Intent	8	6	12	20	9	9
<b>Total No of Incidents</b>	<b>201</b>	<b>205</b>	<b>177</b>	<b>150</b>	<b>173</b>	<b>141</b>

## 5.2 Fire Hazards

This category allows staff to report issues which may present a fire hazard with regards to the potential to cause fire or affect the ability of persons to make their escape in the event of a fire. During this reporting period (2020/21), 3 fire hazards were reported which related to obstructions in fire escape routes. The reported issues were suitably resolved.

## **5.3 Fire Risk Assessments (FRAs)**

### **5.3.1 General**

As outlined in the Annual Fire Safety Report for reporting period 2019/20, NHSL continues to use the EAMS for recording all FRAs, as mandated by Scottish Government and in accordance with NHS Scotland Fire Safety Policy CEL 11 (2011).

The current total number of FRA areas is 439, all of which are completed and entered into the EAMS. The total number of FRAs areas recorded on EAMS at the end of this reporting period 2020/21 has remained unchanged from the previous reporting period 2019/20.

The total number of FRAs will continue to be subject to change as new premises are acquired, old premises are disposed of and operational changes are made within existing premises.

### **5.3.2 Fire Risk Assessment Review Programme**

Regulation 3 of The Fire Safety (Scotland) Regulations 2006 places a requirement on duty holders to review FRAs on a regular basis. To satisfy this requirement, NHSL has an established rolling programme of FRA reviews. The frequency of premises FRAs are the subject of review and is based on the level of fire risk. During the reporting period 2020/21 the Fire Safety Annual Work Plan targeted 100 FRA reviews to be completed. Although the total number of reviews planned was achieved not all targeted areas were reviewed due to access restrictions applied in many areas as a result of COVID 19. NHSL Fire Safety Team in the new reporting period (2021/22), after restrictions preventing access have been removed, will as a matter of priority target those areas where FRA Reviews were unable to be conducted.

## **5.4 Planned Fire Safety Works 2020/21**

Allocation of circa £1,091,000 has been expended on fire safety works during this reporting period 2020/21. This included circa £92,000 for Lanarkshire Wide Business Continuity projects and circa £ 999,000 allocated to Monklands Business Continuity projects which continue to be treated separately. This funding was utilised to address significant risks recorded in the EAMS, as identified in the FRAs, and prioritised works identified during Fire Safety Audits conducted by SFRS Enforcement Officers. The funding was mainly targeted at the continued upgrading of fire doors and fire compartmentation within primary care premises and the continued upgrading of fire compartmentation and improvements to the existing fire warning and detection system at UHM.

A report for NHSL's Capital Investment Group has been prepared which identifies the outstanding issues which will be progressed during reporting period 2021/22. These have been prioritised based on risk, which considers all relevant factors

Fire Safety Works at UHM continue to be a priority and dealt with separately as during the previous reporting periods.

## **5.5 Fire Safety Compliance Audits Conducted by SFRS**

During this reporting period 2020/21 SFRS conducted 12 Fire Safety Audits in the under noted NHSL premises. This is a reduction in number of Fire Safety Audits normally conducted

annually by SFRS Enforcement Officers in NHSL Premises and was due the SFRS Annual Fire Safety Routine Audit Plan for 2020/21 being temporarily suspended due to COVID 19.

#### Planned Routine Audits

- Wester Moffat Hospital.
- UHW, various Areas.
- UHH Wards 15,16,19,20
- Stonehouse Hospital Stonehouse.
- Kilsyth Victoria Hospital Kilsyth.
- Coathill Hospital Glencairn Ward.
- Coathill Hospital Glenmore Ward.

#### Post Fire Audits

- Ward 1 UHH.

None of the audits resulted in formal enforcement action being taken by SFRS against NHSL. Enforcements Officers noted only issues of minor deficiency for all other premises.

SFRS Enforcements Officers conducted a number of the fire safety audits remotely as a result of the COVID 19 pandemic, however they have reintroduced “on site audits” following a significant reduction of the number of hospital admissions relating to Coronavirus but have advised that they will keep the situation under review.

Enforcements Officer will continue to sample audit any property with a sleeping risk at least once annually.

## 5.6 Fire Safety Training

During this reporting period 2020/21 NHSL Fire Safety Team and identified staff from HSCP North and South Divisions delivered Fire Safety Awareness Training Sessions on a regular basis throughout the year.

Fire Safety Training is part of the NHSL mandatory training programme. Current SHTM Fire Code Guidance and NHSL Fire Safety Policy require all staff to participate in General Fire Safety Awareness training a minimum of once annually.

### 5.6.1 Staff Participation in General Fire Safety Awareness Training

67% of staff participated in General Fire Safety Awareness Training during this reporting period 2020/21. This figure indicates a 7% decrease on the number of staff who participated in training during reporting period 2019/20.

The table below provides a breakdown of the number of staff who participated in fire safety training during reporting period 2020/21 and the percentage level of staff compliance with policy requirements.

Fire Safety Training 1 <sup>st</sup> April 2020 to 31 <sup>st</sup> March 2021				
Operating Division	Not Compliant	Compliant	Total	Percentage Compliant
Acute	2078	4067	6145	66%
Corporate Services, PSSD, Other Services	968	2003	2971	67%
HSCPs, Mental Health & Learning Disabilities	1771	3878	5649	69%
Overall Total for NHSL	4817	9948	14765	67%

The above figures include General Fire Safety Awareness Training (*Face to Face*) and General Fire Safety Awareness Online Training (*Learnpro*),

Fire safety training provided by NHSL continues to be made available to Serco & ISS staff at Wishaw and Hairmyres Hospitals, although their attendance is not included in NHSL figures.

The requirement for staff to undertake fire awareness training is detailed in The Fire Safety (Scotland) Regulations 2006 (*Regulation 20*).

### 5.6.2 Staff Participation in Fire Safety Training 2015/16 to 2020/21

The table below provides a comparison on the percentage of staff attendance at General Fire Safety Awareness Training across NHSL over a six-year period from 2015/16 to 2020/21.

General Fire Safety Awareness Training 2015/16 to 2020/21						
Division	2015/16	2016/17	2017/18*	2018/19	2019/20	2020/21
Acute	67%	66%	No Report	85.7	74%	66%
Corporate Services & PSSD	91%	97%	No Report	42.8	58%	67%
North HSCP	89%	80%	No Report	57.2	82%	
Mental Health & Learning Disabilities			No Report	65.6	82%	
South HSCP	92%	81%	No Report	60.7	83%	
HSCPs, Mental Health & Learning Disabilities**						69%

\* It should be noted that no fire safety training report could be provided for Annual Fire Safety Report 1<sup>st</sup> April 2017 to 31<sup>st</sup> March 2018 due to unanticipated operational issues with the introduction of the eEss training and recording system.

\*\* It should be noted from start of reporting year 20/21 North and South HSCPs and Mental Health & Learning Difficulties General Fire Safety Training attendance figures are reported as one total figure from eEss System with no breakdown available.

The level of compliance for reporting period 2020/21 gives significant cause for concern as this is the lowest figure achieved over the last 6 reporting periods. Although staff generally have been under severe operational pressure during the COVID 19 Pandemic, the completion of General Fire Safety Training remains both a statutory and policy requirement. The above figures indicate over 1/3 of staff failed to undertake General Fire Safety Training, circa 4000 personnel. In addition to the statutory and policy requirements to undertake training, it should also be recognised that the challenging circumstances the pandemic presented caused the level of fire risk to increase and accordingly participation in General Fire Safety Training should have been made a matter of priority.

### 5.6.3 Managing Fire Safety Online Module

During this reporting period 2020/21 a total of 537 staff completed the Fire Safety Managers online training package. This package provides managers with necessary training and information to effectively manage fire safety within buildings or areas for which they have fire safety responsibility.

### 5.6.4 Additional Fire Safety Training

NHSL Fire Safety Training Advisor on behalf of the NOF and the Director Hospital Services UHM delivered an additional fire safety training module which focused on the specific challenges of conducting an Emergency Fire Evacuation within the Medical and Surgical Towers. This training was provided as part of the additional fire risk management controls

implemented at UHM to manage additional identified risks from fire. The programme has been revised for reporting period 2020/21 to cover the reintroduction of Progressive Horizontal Evacuation Procedures within the Surgical and Medical Towers following the completion of works to upgrade fire compartmentation. Unfortunately, as a result of the COVID 19 pandemic this training was suspended due to difficulties with staff being released to attend sessions, restrictions on the maximum number of students for instructor led training and the training including a number of practical sessions which would require close personal contact. This training will recommence during reporting period 21/22 if the situation improves.

### **5.6.5 Corporate Induction Training**

During this reporting period 2020/21 NHSL Fire Safety Training Advisor continued to assist Organisation Development in the delivery of the Corporate Induction Programme. The programmes fire safety module normally consists of a face-to-face presentation. During the period of the COVID 19 pandemic this module has been delivered online. Following the completion of fire safety induction module staff are required to complete the online General Fire Safety Module and Specific Fire Safety Induction Training which is provided at Ward/Department level by line managers. NHSL Fire Safety Team will continue to assist Organisation Development to deliver this programme in the new reporting period 2021/22.

### **5.6.6 Hospital Cover Nurse Training**

During reporting period 2020/21 NHSL Fire Safety Training Advisor was only able to deliver a limited number of Hospital Cover Nurse Training sessions as a result of the COVID 19 pandemic. The training was targeted mainly at newly appointed Senior Charge Nurses. It is anticipated the normal number of sessions will be delivered during reporting period 2021/22 if the situation improves.

### **5.6.7 Fire Safety Training Review and Development**

As part of NHSL Fire Safety Team's process of continuous improvement, NHSL Fire Safety Training Advisor reviewed and updated the General Fire Safety Training online LearnPro module which will be introduced during the new reporting period. Also, a new Emergency Fire Evacuation Coordinators Course has been developed and introduced. This training is aimed at all staff within inpatient care facilities who may be responsible for coordinating the evacuation of wards during a fire incident. During the new reporting period NHSL Fire Safety Training Advisor will continue to provide support and assistance to site managers with regards to the planning and running of fire safety training.

## **6 NHSL and SFRS Partnership Working**

### **6.1 Concordat of Partnership Working**

The Concordat of Partnership Working between NHS Scotland and Scottish Fire & Rescue Service continues to underpin the partnership arrangements between NHSL and SFRS. NHSL continues to engage with local enforcement officers and operational crews on a regular basis.

### **6.2 Joint Partnership Meetings NHSL and SFRS**

Meetings between NHSL and SFRS North and South Lanarkshire Areas were scheduled quarterly during reporting period 2020/21. Unfortunately, the schedule was disrupted due to the COVID 19 pandemic, although contact was maintained to discuss any fire safety issues of a critical nature.

Recently, meetings have been able to be convened again on a routine basis. These meetings are considered vital to enable effective communication between NHSL and SFRS.

## 6.3 Partnership Initiatives

The partnership working relationship between NHSL and SFRS is now well established and continues to develop and bring forward joint initiatives to improve the overall level of fire safety for staff, patients and visitors in all NHSL premises. During reporting period 2020/21, SFRS and NHSL have worked collaboratively to overcome any challenges relating to the COVID 19 pandemic. In particular, NHSL Fire Safety Team has facilitated a programme of remote fire safety audits conducted by SFRS.

In addition, NHSL Fire Safety Team, continue to:

- Keep a continued to focus on UFAS reduction.
- Facilitate familiarisation visits and fire safety audits for SFRS officers to all NHSL premises,
- Provide information and assistance for SFRS Officers when completing their operational risk assessments for NHSL buildings.

## 7 Health Facilities Scotland (HFS)

### 7.1 National Fire Safety Group (NFSG)

HFS hosts the NFSG whose membership includes Fire Safety Advisors from NHS Boards across Scotland, representatives from the Scottish Building Standards Agency, Scottish Government Health Department and SFRS. NHSL Senior Fire Advisor is a member of this group which allows the opportunity for NHSL to contribute to the strategic management of fire safety within Scottish Healthcare and allows NHSL to keep abreast of forthcoming amendments to legislation or guidance and be aware of fire safety issues and performance across Scottish Health Boards.

### 7.2 Scottish Government Health Department (SGHD) Fire Policy CEL 11(2011)

The SGHD Fire Policy CEL 11 was due for revision in May 2014. SGHD have not indicated when a revised National Policy is likely to be issued. NHSL Fire Safety Policy V10 was revised by using SGHD Fire Policy CEL11 as a reference document. The current revision of NHSL Fire Safety policy is also being conducted using SGHD Fire Policy as reference. Following the issue of a revised National Policy, NHSL Senior Fire Advisor will review NHSL current Fire Safety Policy and revise as required. In accordance with current procedure, any revised NHSL Fire Safety Policy will be subject to the established governance procedure and presented to NHSL Fire Safety Group for final approval.

## 8 Fire Safety Groups

The reporting of the level of fire safety compliance with current fire safety legislation, fire safety regulations and NHSL's Fire Safety Policy, is by a structured set of Fire Safety Groups which meet on a quarterly basis. The Groups include appropriate managerial representation in the membership. During this reporting period, as a result of operational pressures across the organisation due to the COVID 19 Pandemic, Senior Site Responsible Managers have found difficulties convening meetings on a routine basis and several Local Fire Safety Group Meetings have been cancel.

The impact of Fire Safety Group meetings being cancelled was alleviated by NHSL Fire Safety Advisors being fully involved in Local Bronze Command Groups which enabled matters of concern relating to fire safety to be raised with the relevant management teams.

These Groups are:



- NHSL Fire Safety Group - Chaired by the General Manager Property & Support Services Division, as the NOF.
- Three site based acute hospital fire safety groups
  - UH Hairmyres and Stonehouse Hospital Fire Safety Group,
  - UHM and Wester Moffat Fire Safety Group,
  - UH Wishaw Fire Safety Group,
- HSCP North & South Operating Divisions Health and Fire Safety Groups,
- Law House Health and Fire Safety Group,
- Kirkland's Site Health and Fire Safety Group.
- Beckford Street Health and Fire Safety Group.

In reporting period 2020/21, the governance structure of fire safety was revised and improved by the introduction of a new reporting methodology. The new reporting methodology includes the presentation of a quarterly Fire Safety Performance Report to CMT which details the progress of Fire Safety Corrective Action Plans issued to SSRMs as a result of deficiencies identified following Fire Safety Audit conducted by SFRS Fire Safety Enforcement Team or Fire Risk Assessment Review conducted by NHSL Fire Safety Team.

In reporting period 2021/22 it is intended to improve the governance further, by requiring SSRMs to report on performance relative to the 3 Fire Safety Key Performance Indicators to NHSL Fire Safety Group namely:

- KPI.1 Staff participation General Fire Safety Awareness Training,
- KPI.2 Staff participation Emergency Fire Evacuation Drills,
- KPI.3 The completion of Monthly Fire Safety Inspections.

This information in turn will inform the Quarterly CMT Fire Safety Performance Report and the Boards Annual Fire Safety Report. The improved reporting methodology will be introduced at the start of reporting period 2022/23

## **9 Fire Safety Policy and Procedures**

The current NHSL Fire Safety Policy routine review was completed in 2018, with a revised Fire Safety Policy V10 being issued in June 2018. The Fire Safety Policy continues to be a standing agenda item at NHSL and Local Fire Safety Group meetings.

A review and revision of the current version of NHSL Fire Safety Policy Version 10 was commenced in March 2021. The revised policy document will be circulated to all stakeholders for consultation. Following the consultation period, Version 11 of the policy will be finalised for approval and implementation.

During the reporting period 2020/21 two new fire safety procedural documents were approved and implemented by NHSL Fire Safety Group namely;

- Safe Use of Oxygen – Oxygen Monitoring Procedure No IMS 342
- Fire Safety Performance Monitoring Procedure No IMS 343

## **10 Fire Safety Control Book**

The current total of Fire Safety Control Books (FSCB) issued is 262 covering all NHSL sites.

The FSCB continues to provide a focus and structure to achieve and maintain fire safety compliance. The FSCB provides a coordinated system of management to control and minimise the risk of fire to NHSL Staff, Patients, and Visitors and to minimise the potential effects fire may have on Business Continuity.

The FSCB assists NHSL Managers to have an awareness of the obligations imposed on them by fire safety legislation and regulation and to understand what is required and why. The FSCB is part of the assurance to the Board that fire safety is being effectively managed across the organisation.

To support SSRM with their duties to ensure fire safety compliance, the NOF operates a programme of sample auditing where a minimum of 25% of FSCBs are audited annually by NHSL Fire Safety Advisors.

During this reporting period 2020/21, the Fire Safety Annual Work Plan targeted 68 FSCB audits to be completed. This target was not met due to access restrictions to wards and departments as a result of COVID 19 pandemic. The 11 outstanding audits will be targeted for completion as part of the Annual Fire Safety Work Plan 2021/22.

The new reporting methodology detailed in item 11 below, which will monitor fire safety performance on a continual basis, will provide a level of governance over the outcomes of FSCB audits to ensure that deficiencies are rectified within reasonable timescales by the issue of Corrective Action Plans to the SSRM which will detail the deficiencies, actions to resolve and time scales for completion.

The FSCB continues to be endorsed by the Enforcing Authority as an example of best practice.

## **11 Statement of Assurance**

The requirement for SSRM to submit a Fire Risk Management Annual “Statement of Assurance” for premises for which they have fire safety responsibility has now been replaced with a new reporting methodology which will monitor fire safety performance on a continual basis. NHSL Corporate Management Team will receive a Fire Safety Performance Report from the Executive Lead for Fire Safety on a quarterly basis. The methodology has been underpinned with the implementation of a new Fire Safety Performance Monitoring Standard Operating Procedure.

The new reporting methodology was introduced on 1<sup>st</sup> April 2021 and it is intended that subsequent Annual Fire Safety Reports will include a detailed analysis of Fire Safety Performance over the period covered by the report.

## **12 SFRS Operational Response to Community Health Centres**

SFRS in May 2020 reduced the level of operational response to all non-sleeping risk premises as part of their response plan to the COVID 19 Pandemic. This resulted in the level of operational response to all Community Health Centers (CHC) being reduced from 2 fire appliances to one in the event of an automatic fire alarm activation. With this approach, the number of fire fighters that would initially attend a fire incident at a CHC would reduce from circa 10 to 4. SFRS have advised they will mobilise a full operational response to a CHC on confirmation by telephone that the cause of a fire alarm activation is an actual fire.

Despite NHSL continuing to raise an objection to the reduced level of operational response with SFRS and raising it as a matter of concern at NHSS National Fire Safety Group, SFRS position remains unchanged.

The NOF, as a result, has advised NHSL Fire Safety Group of SFRS new mobilisation criterion and that SSRM should make necessary arrangements to have suitably nominated staff investigate the cause of a fire alarm activation in order to be able to advise SFRS accordingly and attract a full operation response in the event of an actual fire. To date no CHC has any such arrangements in place.

NHSL Fire Safety Team will provide the necessary training and advice to nominated staff in order that investigations into the cause of a fire alarm activation would be conducted with the minimum of risk.

Although this report reflects activities within the reporting period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021 The Director of Planning, Property and Performance would bring to the Boards attention that in July 2021 SFRS began a public consultation process to formally consult with stakeholders on a permanent mobilising criterion for automatic fire alarm activations which will include healthcare premises. The Chief Executive has formally objected to the proposals made in their consultation document Time for Change Options for responding to Automatic Fire Alarms with regards to their application to hospital premises and considers all of the options proposed will increase the level of fire risk. The objections made by the Chief Executive generally raise concerns with regards to the vulnerability of patients, the complex nature of hospital buildings the evacuation procedures adopted within hospital premises and the need for an immediate and automatic operational response to hospitals to ensure a rapid intervention by Operational Crews should a fire incident occur. The objections raised by the Chief Executive are similar to those raised by all NHSS Boards.

The impact of the implementation of a new mobilising criterion for automatic fire alarm activations by SFRS will be considerable for NHSL. Division Management Teams will require to review and revise procedures for the management of fire alarm activations and how staff respond to a fire incident.

### 13 Annual Fire Safety Work Plan 2021/22

Fire Safety Annual Fire Safety Work Plan 2021/22		
Number	Item	Target Completion Date
1	Provide CMT with quarterly Fire Safety Performance Report	Ongoing
2	Provide NHSL's Fire Safety Group with update reports on Fire Risk Management and compliance progress.	Ongoing
3	Investment needs to address building and fire safety deficiencies throughout the NHSL Estate continue to be developed and record on a prioritised risk register, reviewed by NHSL's Fire Safety Group.	31 <sup>st</sup> March 2022
4	Carry forward continued improvement to the level of Fire Warning and Detection and Fire Alarm Cause and Effect provided across UH Monklands. Overseen by UH Monklands Business Continuity Group	31 <sup>st</sup> March 2022
5	Continue improvements to Fire Compartmentation in the Ground and Lower Ground Floors UH Monklands. Overseen by UH Monklands Business Continuity Group	31 <sup>st</sup> March 2022
6	Complete Fire Risk Assessment review programme, with a target of 100 reviews	31 <sup>st</sup> March 2022
7	Complete programme of Fire Safety Control Book sample audits (minimum sample of 25% of Fire Safety Control Books)	31 <sup>st</sup> March 2022
8	Continue to deliver a programme of additional fire safety training to Monklands Hospital on behalf of the Director Hospital Services (UH Monklands) focused on the specific challenges of conducting an Emergency Fire Evacuation within the Medical and Surgical Towers.	31 <sup>st</sup> March 2022
9	Support the programme of fire evacuation drills within the three acute hospital sites, North and South Health and Social Care Partnerships areas and Corporate Services, implemented by the Site Responsible Senior Managers to enable each member of staff to participate in a minimum of one drill within the new reporting period 2021/22.	31 <sup>st</sup> March 2022
10	Carry forward the review of NHSL Fire Safety Policy and revise accordingly	31 <sup>st</sup> March 2022
11	Continue to develop partnership working with SFRS North and South Lanarkshire in accordance with the national concordat developed between NHS Scotland and SFRS.	31 <sup>st</sup> March 2022

12	Continue to review, develop and improve the existing programme for Fire Awareness Training for the Acute Hospital Sites and North and South Health and Social Care Partnerships areas. Present conclusions to NHSL Fire Safety Group for Approval.	31 <sup>st</sup> October 2021
13	Continue to develop the NHSL/ SFRS, Acute Sites Joint UFAS Reduction Groups	31 <sup>st</sup> March 2022
14	Conduct a review of selected sections of the Fire Safety Control Book to assess its effectiveness and maintain a process of continual improvement. The intended sections for review (Section 6 Workplace Fire Safety Induction, Section 8 Personal Emergency Evacuation Plans, Section 10 Evacuation Drills.)	31 <sup>st</sup> March 2022
15	Review and revise current fire response procedures to take account of SFRS revised mobilisation criterion for Operational Predetermined Attendance to NHSL premises	31 <sup>st</sup> March 2022
16	Develop a Fire Safety Awareness Programme aimed at all members of staff to be ready for implementation in new reporting period	28 <sup>th</sup> February 2022

## 14 Summary

This report is presented to NHSL Board to provide key information and give assurance that the management of fire risk across NHSL estate is being carried out in a planned and structured manner, with the required reporting arrangements in place via NHSL's Corporate Management Team.

The report identifies those areas where positive improvements have been made in this reporting period 2020/21 and details a number of additional activities planned for 2021/22.

## 15 Recommendations

NHSL Board are requested to:

- Note continued progress in fire safety management during reporting period 2020/21
- Note and approve the content of the Annual Fire Safety Report 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021 including activities planned for reporting period 2021/22.

## 16 References

- Fire (Scotland) Act 2005.
- The Fire Safety (Scotland) Regulations 2006.
- Scottish Government Fire Safety Policy for NHS Scotland CEL 11(2011).
- NHS Scotland Firecode Suite of Documents.
- NHSL Fire Safety Policy V10 – June 2018.

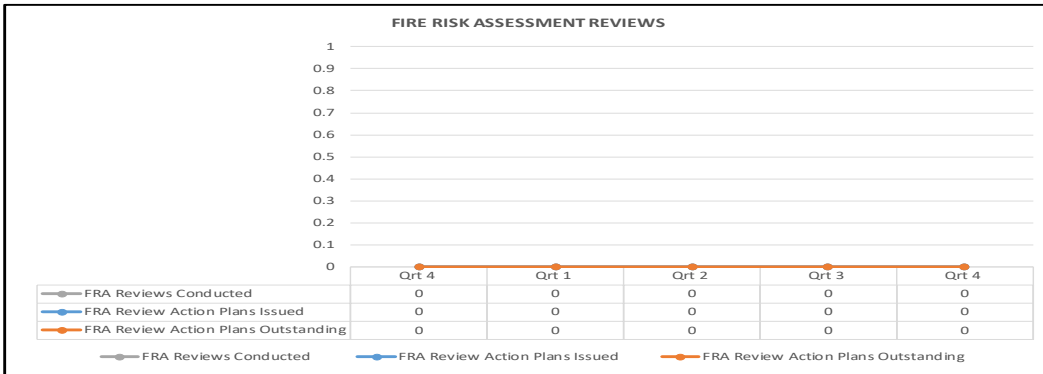
CORPORATE MANAGEMENT TEAM  
FIRE SAFETY PERFORMANCE  
REPORT

EXAMPLE

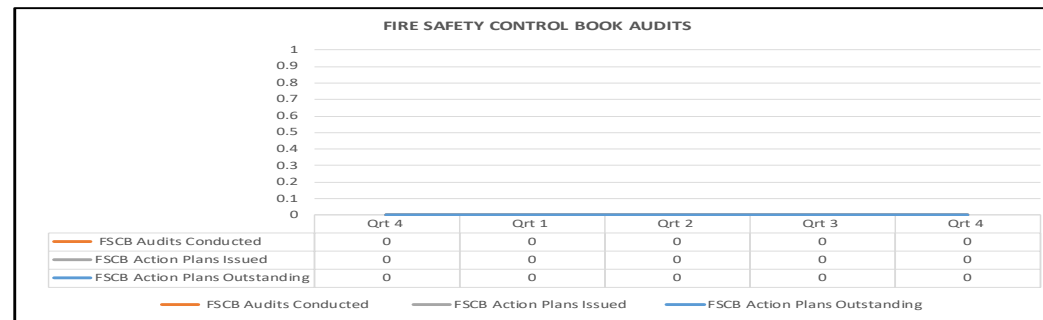
**FIRE SAFETY REPORT**  
**FIRE SAFETY CONTROL BOOK AUDITS, FIRE RISK ASSESSMENT REVIEWS, FIRE SAFETY ENFORCEMENT AUDITS**

**REPORTING PERIOD**  
**1st April xxxx to 31st March xxxxx**  
**Quarter xxxxx to xxxxx**

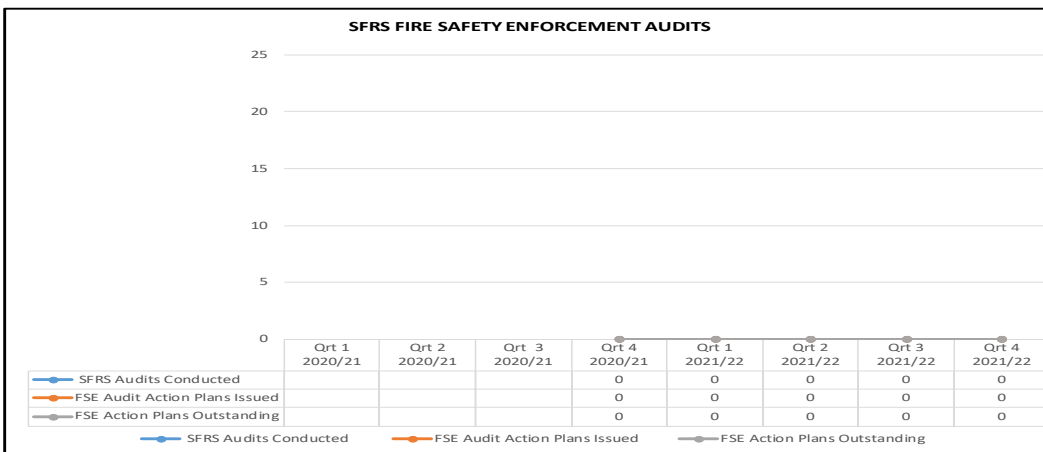
FIRE SAFETY RISK ASSESSMENT REVIEWS									
	Qrt 1	Qrt 2	Qrt 3	Qrt 4	Qrt 1	Qrt 2	Qrt 3	Qrt 4	
FRA Reviews Conducted					0	0	0	0	0
FRA Review Action Plans Issued					0	0	0	0	0
FRA Review Action Plans Outstanding					0	0	0	0	0



FIRE SAFETY CONTROL BOOK AUDITS									
	Qrt 1	Qrt 2	Qrt 3	Qrt 4	Qrt 1	Qrt 2	Qrt 3	Qrt 4	
FSCB Audits Conducted					0	0	0	0	0
FSCB Action Plans Issued					0	0	0	0	0
FSCB Action Plans Outstanding					0	0	0	0	0



SFRS FIRE SAFETY ENFORCEMENT AUDITS									
	Qrt 1	Qrt 2	Qrt 3	Qrt 4	Qrt 1	Qrt 2	Qrt 3	Qrt 4	
SFRS Audits Conducted					0	0	0	0	0
FSE Audit Action Plans Issued					0	0	0	0	0
FSE Action Plans Outstanding					0	0	0	0	0



ACTION PLANS ISSUED BY PREMISES					
Premise	FRA Action Plans Issued	FRA Action Plans Outstanding	FSCB Action Plans Issued	FSE Audit Action Plans Issued	FSE Action Plans Outstanding
UH Hairmyres	0	0	0	0	0
UH Wishaw	0	0	0	0	0
UH Monklands	0	0	0	0	0

## FIRE SAFETY REPORT

### ACUTE HOSPITAL

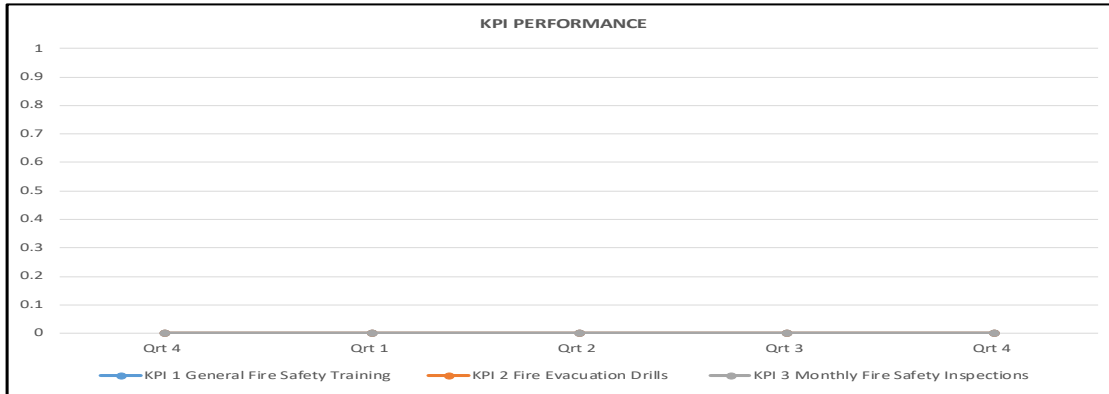
#### KPI COMPLIANCE %

**GENERAL FIRE AWARENESS TRAINING, FIRE EVACUATION DRILLS, MONTHLY FIRE SAFETY INSPECTIONS**

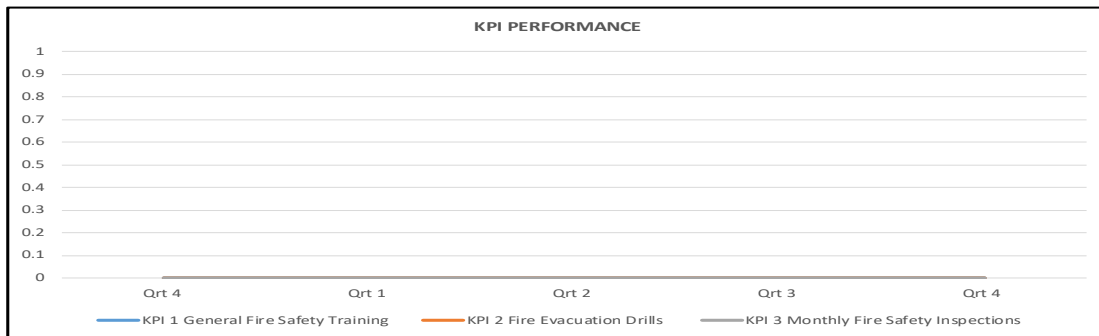
REPORTING PERIOD: 1st April XXXX to 31st March XXXX

QUARTER X ACCUMULATIVE : XXXX to XXXXX

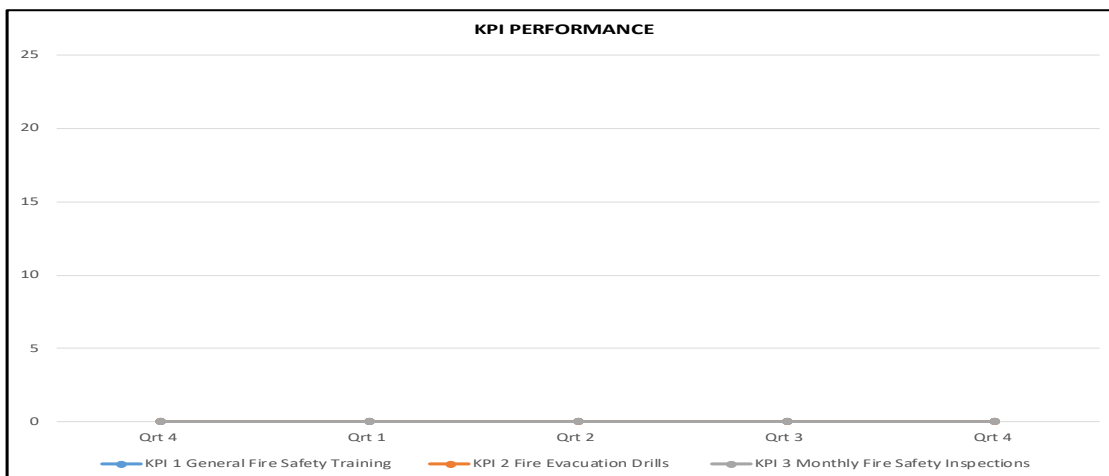
UNIVERSITY HOSPITAL MONKLANDS								
	Qrt 1	Qrt 2	Qrt 3	Qrt 4	Qrt 1	Qrt 2	Qrt 3	Qrt 4
KPI 1 General Fire Safety Training				0	0	0	0	0
KPI 2 Fire Evacuation Drills				0	0	0	0	0
KPI 3 Monthly Fire Safety Inspections				0	0	0	0	0



UNIVERSITY HOSPITAL WISHAW								
	Qrt 1	Qrt 2	Qrt 3	Qrt 4	Qrt 1	Qrt 2	Qrt 3	Qrt 4
KPI 1 General Fire Safety Training				0	0	0	0	0
KPI 2 Fire Evacuation Drills				0	0	0	0	0
KPI 3 Monthly Fire Safety Inspections				0	0	0	0	0



UNIVERSITY HOSPITAL HAIRMYRES								
	Qrt 1	Qrt 2	Qrt 3	Qrt 4	Qrt 1	Qrt 2	Qrt 3	Qrt 4
KPI 1 General Fire Safety Training				0	0	0	0	0
KPI 2 Fire Evacuation Drills				0	0	0	0	0
KPI 3 Monthly Fire Safety Inspections				0	0	0	0	0

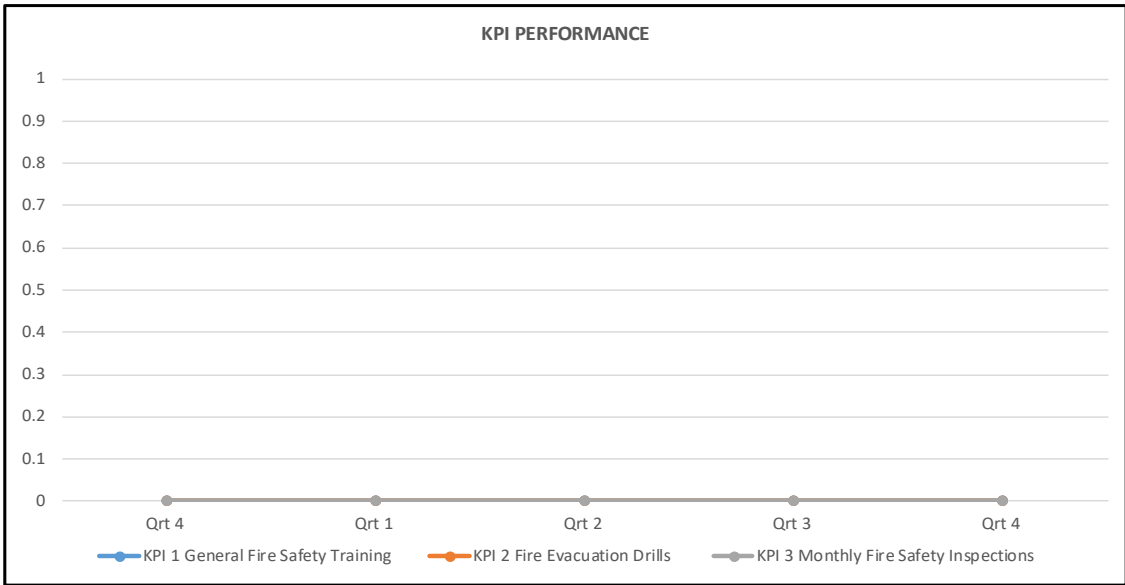


**FIRE SAFETY REPORT  
NORTH & SOUTH HEALTH & SOCIAL CARE PARTNERSHIPS**

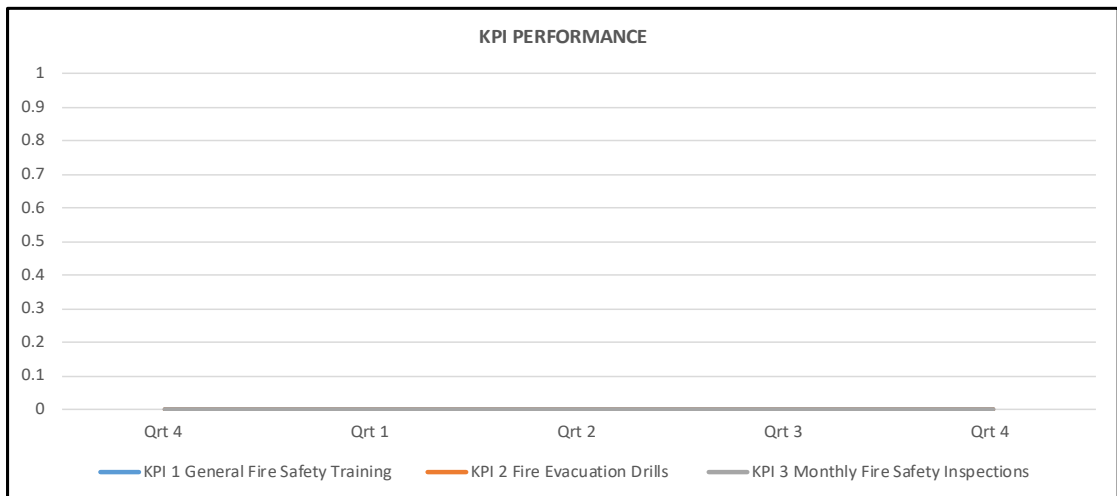
**KPI COMPLIANCE %  
GENERAL FIRE AWARENESS TRAINING, FIRE EVACUTATION DRILLS, MONTHLY FIRE SAFETY INSPECTIONS**

**REPORTING PERIOD: 1st April xxxx to 31st March xxxx  
QUARTER X ACCUMULATIVE : xxxx to xxxx**

NORTH PARTNERSHIP								
	Qrt 1	Qrt 2	Qrt 3	Qrt 4	Qrt 1	Qrt 2	Qrt 3	Qrt 4
KPI 1 General Fire Safety Training				0	0	0	0	0
KPI 2 Fire Evacuation Drills				0	0	0	0	0
KPI 3 Monthly Fire Safety Inspections				0	0	0	0	0



SOUTH PARTNERSHIP								
	Qrt 1	Qrt 2	Qrt 3	Qrt 4	Qrt 1	Qrt 2	Qrt 3	Qrt 4
KPI 1 General Fire Safety Training				0	0	0	0	0
KPI 2 Fire Evacuation Drills				0	0	0	0	0
KPI 3 Monthly Fire Safety Inspections				0	0	0	0	0





## NARRATIVE