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STATEMENT OF ASSURANCE

We have completed the internal audit of the Fire and Emergency Program. The overall objective of the audit was to review and assess the framework within which the Fire and Emergency Program is managed and to recommend improvements.

The internal audit was conducted in accordance with the Treasury Board Secretariat (TBS) Policy on Internal Audit and the Institute of Internal Auditors Standards for the Professional Practice of Internal Auditing

The audit team assessed the management control framework against criteria derived from the Treasury Board Secretariat (TBS) 2003 Management Accountability Framework as well as TBS audit guides.

In our professional judgment, sufficient and appropriate audit procedures have been conducted and evidence gathered to support the accuracy of the conclusions reached and contained in this report. The conclusions were based on a comparison of the situations as they existed at the time of the audit and against the audit criteria. It should be noted that the conclusions are only applicable for the areas examined.

ABBREVIATIONS

Acronym	Explanation
AO	Administrative Officer
CCMD	Contraventions and Contracts Management Division
CFEW	Chief Fire Emergency Warden
D/CFEW	Deputy Chief Fire Emergency Warden
DSO	Departmental Security Officer
EMB	East Memorial Building
FE	Fire (and) Emergency
FEO	Fire Emergency Organization
FFEW	Floor Fire Emergency Warden
FTE	Full-time equivalent
GSP	Government Security Policy
HQ	Headquarters
IT	Information Technology
NAOHS	National Accommodations & Occupational Health & Safety Division
NCR	National Capital Region
OH&S	Occupational Health & Safety
PWGSC	Public Works and Government Services Canada
SOTAD	Security Operations, Telecommunications and Accommodations Division
TBS	Treasury Board of Canada Secretariat

EXECUTIVE SUMMARY

Introduction

We have completed the internal audit of the Fire and Emergency (FE) Program at the Department of Justice Headquarters (HQ). Our objective was to review and assess the framework within which the FE Program operates, to assess compliance with standards, and to recommend improvements.

The audit was guided by policies and guidelines applicable to the Department's FE Program, including Treasury Board of Canada Secretariat (TBS) Fire Protective Standards that relate to the Canada Occupational Health and Safety Regulations of the *Canada Labour Code*.

The Fire Emergency Organization (FEO) delivers the Fire and Emergency Program in the Department of Justice. In accordance with TBS standards, the Deputy Minister (DM), as the senior officer for the HQ complex, is responsible for the FEO and has duly appointed the Chief Fire Emergency Warden (CFEW) to oversee the FE Program and put in place the appropriate tools and mechanisms. The CFEW role is assumed by the Manager, National Emergency Preparedness and Departmental Special Programs under the direction of the Director, National Accommodations and Occupational Health and Safety (NAOHS) Division, Administration Directorate, Corporate Sector. The CFEW role also includes providing functional direction nationally to regional fire and emergency coordinators. In the regional offices responsibility for fire and emergency rests with the regional Finance and Administration sections.

The scope of the audit included the organization and administration of the fire and emergency function in Headquarters as well as a sample of regional practices through telephone interviews with regional staff and management.

Findings

The FE Program at the Department of Justice is a well-established, ongoing program operating under TBS standards and statutory requirements. The audit team found that efforts towards fire safety compliance have generally resulted in positive results with only a few examples of non-

compliance, as noted below. In our view the integration of the FE Program within the Occupational Health and Safety (OH&S) environment has aided the achievement of compliance efforts.

Due to the potential impact on the safety and security of employees, commitment from the Deputy Minister and senior management is essential for the success of the program. The scope and reach of the FE program necessitates the support and sponsorship of senior management, particularly to clarify the roles and responsibilities of the various key participants. We found that the sufficiency of staff resources, the delineation and clarification of key roles and responsibilities, and tangible senior management advocacy for the program need attention.

The future effectiveness of the FE Program depends on the competency, motivation, and presence of adequate numbers of Floor Fire Emergency Wardens. We found that, at present, plans and strategies to address staff capacity, recruitment, retention, training, and supervisory oversight are not evident for this important program. As a result, not only the program, but also occupant safety may be at risk.

Furthermore, improvements are needed to reflect and promote consistent and current best practices for the FE Program. Evacuation plans must be kept up-to-date and procedures for administrative and management reporting purposes should be appropriately documented. Documented policies, plans, and procedures on the Fire and Emergency Program describe important elements of the program and its administrative framework, and serve to protect the safety of all occupants.

The audit team found that there was a lack of a rigorous process for management and performance reporting for the FE Program. This is primarily due to insufficient documented practices to allow for the monitoring of the FE Program and to provide for timely corrective measures.

Lastly, the capability to provide a nationally effective communications approach is essential to providing Department-wide leadership for the FE Program. Although the current CFEW has developed strong rapport through frequent contact with employees and FEO members within the HQ complex (which enhances communications locally), we found that a more effective communications approach for the FE Program is needed. This would include improved communications with the regions and more clearly defined collaboration with key groups, such as the Departmental Security Officer's staff.

The management response to the recommendations contained in this report was provided by the Director General, Administration.

1. INTRODUCTION

1.1 Background

Government departments are responsible under the *Canada Labour Code*, Part II and under the Treasury Board Secretariat (TBS) Policy on Fire Protection Investigation and Reporting for the health and safety of employees at work. In the Department of Justice a Fire Emergency Organization (FEO) operates the Fire and Emergency (FE) Program. The TBS Operating Standard, which supplements the above TBS policy, defines the FEO as “a formal organization of designated staff to perform specified duties in the event of a fire emergency.” These “designated staff” are essentially volunteers recruited from supervisory and staff ranks. The FEO accomplishes its tasks through training, safety, prevention, and inspection programs.

The Manager, National Emergency Preparedness and Departmental Special Programs has been appointed Chief Fire Emergency Warden (CFEW) by the Deputy Minister, in accordance with the TBS Operating Standard. The CFEW develops and maintains FE Program services for all employees, occupants, and visitors to Department of Justice headquarters (HQ) and satellite offices in the National Capital Region (NCR), and provides functional direction to regional offices nationally. In cooperation with Security, building management, private sector consultants, and Occupational Health & Safety (OH&S) committees, the CFEW develops emergency plans that detail evacuation and other procedures in place for dealing with fires, earthquakes, bomb threats, searches, and building evacuations.

The policies and guidelines that apply to the Fire and Emergency Program include: the TBS Fire Protective Standards – a suite of standards that cover: Fire Protection Services – General (3-00); Fire Safety Planning and Fire Emergency Organization (3-01); Fire Protection Design and Construction (3-02); Fire Protection Electronic Data Processing Equipment (3-03); Fire Alarm Systems (3-04); Fire Inspections (3-05); and Fire Protection Correctional Institutions (3-06). These standards implement the intent of the Canada Occupational Health and Safety Regulations of the *Canada Labour Code*.

Some of the key risks identified in selecting the Fire and Emergency Program for audit were unclear rules of engagement affecting collaboration, ineffective planning for staff and volunteer resources, insufficient documentation and non-compliance with government standards, inadequate communications, and inadequate management and performance reporting.

1.2 Audit Objectives and Scope

The objectives of this audit were to review and assess:

- the management control framework (policies, practices, and procedures relating to planning, organizing, controlling, leading, and communicating; and the management of financial, human, and materiel resources);
- the extent of compliance with the relevant provisions of Part XVII of the Canada Occupational Safety and Health Regulations - (Safe Occupancy of the Work Place); and Treasury Board Standards 3-1 - Fire Safety Planning and Fire Emergency, 3-3 - Fire Protection for Data Processing Equipment, and 3-5 - Fire Inspections;
- the adequacy of the monitoring procedures implemented for fire prevention and emergency planning and evacuation;
- the reliability of information systems for decision-making and accountability purposes;
- the level of functional direction provided to regional offices;
- the appropriateness of program interfaces with the local fire department, the Canadian Corps of Commissionaires, facility management services, departmental employees, and private company employees who occupy the buildings;
- the adequacy of information and training provided to building occupants and persons having official duties in the fire and emergency organization.

The scope of the audit included the organization and administration of the fire and emergency function in Headquarters offices as well as a sample of regional practices (i.e. Ontario, Atlantic and Prairie) through telephone interviews with regional staff and management.

An audit planning phase in October 2006 preceded the audit on-site examination phase, which extended from November 2006 to January 2007.

2. OBSERVATIONS - MANAGEMENT FRAMEWORK

To assess the adequacy and appropriateness of the management framework of the Fire and Emergency Program, the auditors examined: staff roles and responsibilities; human resources planning; the placement of the FE Program within the organizational structure; policies, plans, and procedures; communications; and performance management.

2.1 Roles and Responsibilities

The roles and responsibilities of participants in the FE Program require clarification.

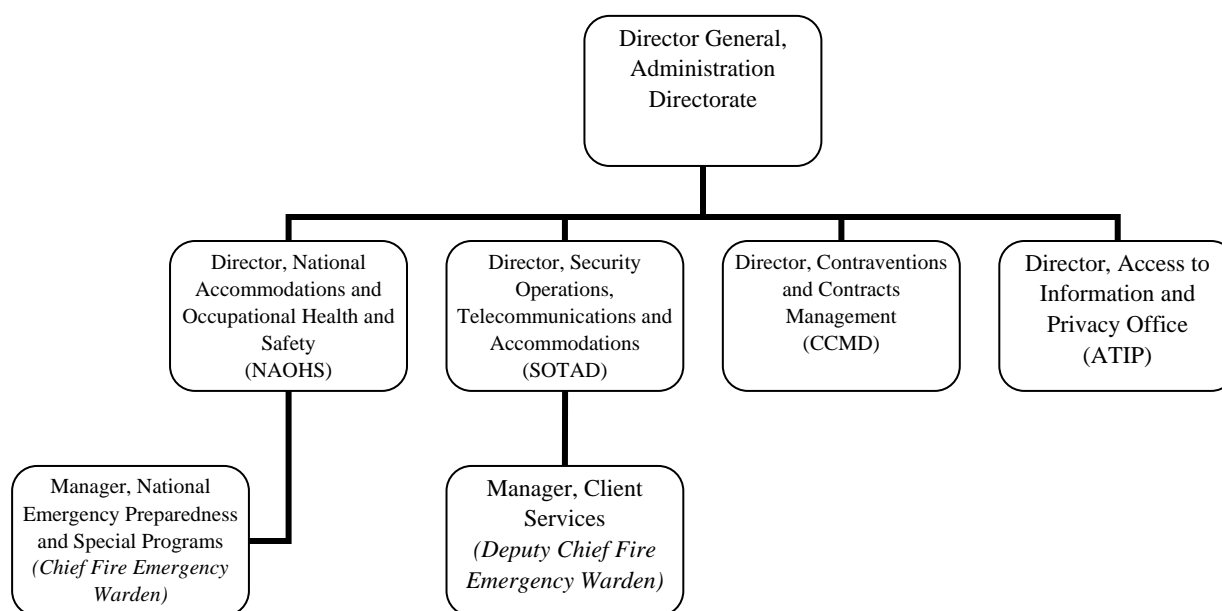
The FE Program is a well-entrenched, ongoing risk mitigation strategy formed out of the principle of due diligence and anchored by government regulations (TBS OH&S Regulations) and statutory requirements (*Canada Labour Code*). Commitment from the Deputy Minister and senior management is essential for the success of the program. Active senior management support in the recruitment, retention, and training of Fire Emergency Organization (FEO) members is required.

During the course of the audit we found a lack of senior management support for the FE Program. We found that sufficient staff resources have not been designated, and roles and responsibilities associated with the FEO have not been clearly defined. For example, during the audit we found that a Floor Fire Emergency Warden (FFEW) had not been identified for the East Memorial Building's first floor, leaving the floor at risk in the event of an emergency. In another case, the Department of Justice official who is the Responsible Building Authority in a National Capital Region (NCR) building declined to meet with the audit team because the individual did not have full knowledge of the responsibilities associated with the role. Additionally, as addressed later in this report, senior management has not instituted a program to recognize the contribution of FEO volunteers.

In the spring of 1999, responsibility for the fire and emergency function was transferred from the Administration and Security Division (ASD) to the Facilities Management Division (FMD). The Fire and Emergency Program internal audit of May 2000 recommended that the appropriateness

of the transfer of the fire and emergency function from ASD to FMD be reassessed. However, management responded that the transfer of duties had been in place for one year prior to the audit and in their view was working well. It was decided therefore that the FE Program function should remain under the direction of FMD. In order to conform to the requirements of the *Canada Labour Code* and Treasury Board standards, the Deputy Minister (the most senior officer of the Department) was required to appoint a Chief Fire Emergency Warden (CFEW) and a Deputy Chief Fire Emergency Warden (D/CFEW) for headquarters. This was done in 2001, thereby allowing for the safe and lawful functioning of the fire and emergency function. Since then, organizational changes have separated the reporting lines (see figure 1), placing the CFEW in the National Accommodations and Occupational Health and Safety (NAOHS) Division and the D/CFEW in the Security Operations, Telecommunications and Accommodations Division (SOTAD).

Figure 1 – Current Organizational Lines



While the responsibilities of the CFEW are clearly outlined by the requirements of TBS policy, guidelines, and standards, this is not the case for D/CFEW responsibilities. The standards do, however, state that the D/CFEW is to be drawn from supervisory staff, should possess or acquire the skills and knowledge necessary to fulfill the duties of the D/CFEW role, and should be available to cover CFEW absences. The Department of Justice does not have explicit terms of reference outlining the responsibilities of the D/CFEW. Therefore, the D/CFEW acts solely as a

“stand-in” during those rare times that a fire evacuation is called and the CFEW is absent. The D/CFEW is not actively engaged in the FE Program as a Floor Fire Emergency Warden, nor does he participate in routine fire inspections or in administrative duties for the program. Also, the regular job functions of the incumbent D/CFEW are not in the same organization as the CFEW (NAOHS). As a result, there is a loss of skill and knowledge that would permit the D/CFEW to properly fulfill the deputised role of the CFEW. In the opinion of the auditors, for the D/CFEW to fully possess the skills and knowledge of the CFEW, the D/CFEW should provide ongoing support to the CFEW (e.g. in inspections), provide continuity during the CFEW’s absence, and offer his/her candidacy in succession planning. This would be more readily achievable if the D/CFEW incumbent’s regular job position were in the same work unit as the CFEW.

Additional sources of confusion with respect to roles arise with the job title and job description of the head of the FEO as well as with the title of the program. The CFEW heads the FEO and in that delegated role is responsible for leading the FE Program. The CFEW’s job title in his substantive position is “Manager, National Emergency Preparedness and Departmental Special Programs”. While the responsibilities of the position include fire evacuation drills, suspicious package search, and the First Aid program, functional direction for emergency preparedness as a security risk management measure is the responsibility of the Departmental Security Officer (DSO) according to the Government Security Policy. The job description of the Manager, National Emergency Preparedness and Departmental Special Programs does not identify a functional reporting relationship to the DSO for emergency preparedness. Moreover, the program has long been referred to in the Department as “Fire and Emergency”, whereas the TBS Policy refers to it as “Fire Emergency.” There would be less confusion if the departmental title of the program reflected that of the TBS Policy.

Also, we found that a lack of agreement between the FEO and the DSO on shared and lead roles and responsibilities during evacuation exercises is an issue. The Government Security Policy (GSP) ascribes the delegated functional responsibility for “protection of employees” to the Departmental Security Officer; whereas the CFEW is responsible for the building evacuation in a fire emergency. TBS standards mandate the CFEW during a fire emergency “to assume full authority for and control of the fire emergency organization, including the evacuation of building occupants in a fire emergency or drill.” The CFEW is also responsible for signalling the end of the evacuation. In practice the DSO effectively, although not formally, delegates the functional responsibility for the protection of employees during evacuation exercises to the FEO. We were told that DSO security staff and commissionaires consider their role during evacuations to be to assume responsibilities for access control (i.e. manning doors and securing the perimeter) and provide support to the FEO on an informal or “as required” basis.

The CFEW has made several attempts to describe and define roles and responsibilities of DSO staff in the HQ complex Building Evacuation Procedures. Examples of these responsibilities include taking up assigned positions at one of the emergency exits, taking floor status reports from the Floor Fire Emergency Wardens exiting the building, ensuring that no one re-enters until such time as the order to re-enter is given, and dispatching commissionaires to take up positions at pre-determined locations. However, these responsibilities have not been formalized. Officially, only FEO members are authorized to remain in the building to perform evacuation duties, while all others, regardless of rank or function, must expeditiously evacuate the premises. The DSO, however, has not agreed to pre-defined roles and responsibilities for its staff and commissionaires within the FEO. In the audit team's view the definition of DSO staff roles and responsibilities within the FEO is an important element that needs to be discussed and agreed upon.

Furthermore, there is no direct organizational linkage between security operations and the CFEW, other than through the DM's office. In the absence of a clearly defined, current organizational structure for the FEO, the audit team has constructed the chart shown in Appendix A. This chart, while not exhaustive, presents a synthesis and summary of existing and expected roles, relationships, and responsibilities as described in the TBS standards and Department of Justice practices. For example, the audit team proposes a formal incorporation of the security operations role and pre-specified duties within the FEO under the authority and control of the CFEW during the active evacuation. (Note in Appendix A the proposed linkage between the CFEW and the Other Fire Wardens.) While not presently in place, such an agreement on responsibilities and lines of authority is crucial to prevent misunderstandings or miscommunication during a real emergency.

The Fire and Emergency Program requires participation from a wide variety of individuals and functions to ensure that it continues to work successfully. Without clearly specified roles and responsibilities, this collaborative process may be at risk, possibly impacting the safety and security of staff during an evacuation.

Recommendations and Management Response

1. It is recommended that the Director, NAOHS seek senior management support to:

a) Appoint a D/CFEW within the NAOHS Division.

Agree. The Deputy CFEW position is currently held by the Manager, Clients Services for the NCR. The Security and NAOHSD organizations are both being reviewed which

could result in the re-alignment functions and increased efficiencies. (Target date: January 2008)

b) Establish formal terms of reference for the D/CFEW.

Agree. The Building Emergency Organization Committee needs to be formally established with Terms of Reference. One of the key deliverables of this committee will be to obtain agreement on the roles and responsibilities of the Chief and Deputy Chief positions. (Target date: February 2008)

c) Change the title of the Manager, National Emergency Preparedness and Departmental Special Programs to reflect a “Fire Emergency” role.

Agree. The Title of the position responsible for the National Fire and Emergencies organization could be changed to Manager, National Fire Emergency Programs to reflect the scope of fire and other emergency duties required. (Target date: December 2007)

2. It is recommended that the Director, NAOHS obtain agreement with the Departmental Security Officer on shared and lead roles in evacuations.

Agree. The Director of SOTAD and the Director of NAOSHD will work together with the Director General, Administration Directorate to ensure that the roles and responsibilities are clearly articulated. Re-alignment of functions may expedite this requirement. (Target date: February 2008)

2.2 Organizational Placement

The integration of the FE Program and procedures within the Occupational Health and Safety (OH&S) environment increases the effectiveness of compliance efforts.

Overall we found that the Fire and Emergency Program at the Department of Justice operates in compliance with the TBS standards and applicable regulations with only those exceptions noted in the report.

OH&S committees within the NCR and OH&S coordinators in the regions we contacted are actively engaged in ensuring that national standards for employee safety required by the OH&S regulations and the respective procedures and plans are being met. We were told that conducting

formal, annual OH&S inspections is an important management priority and that these inspections are completed.

As noted above, the organizational placement of the Fire and Emergency Program was moved from the Administration and Security Division in the late 1990s to the Facilities Management Division and then to the NAOHS Division, where it currently resides. Occupational Health and Safety processes and procedures deal directly with the protection of employees' health and safety in the workplace and are governed by rigorous statutory requirements. The FE Program has a similar mandate for the protection of building occupants and is closely aligned to OH&S processes. In our view, therefore, the integration of the FE Program within a national OH&S framework has assisted the FEO in achieving fire safety compliance.

2.3 Human Resources Planning

Planning strategies to address issues with respect to staff capacity, recruitment and retention, and training are not evident.

The Fire and Emergency Program is one of many ongoing, government-mandated administrative programs that the Department operates. Significant shifts in employee demographics, organizational changes, and resource allocations pose particular risks to these programs.

Staff capacity to administer the program is limited and no clear plans to address capacity challenges are evident. The Manager, National Emergency Preparedness and Departmental Special Programs is the sole full-time resource dedicated to the FE Program through his main role as CFEW. The CFEW is responsible for the Department's national Fire and Emergency Program, covering 4,200 full-time equivalents (FTEs). A summer student may be hired to assist the CFEW on a casual basis, but there are no other full-time or part-time staff dedicated to the FE Program. As noted earlier, the Deputy CFEW and the CFEW are not located in the same division. As a result the D/CFEW is not available to provide adequate support or back-up to the CFEW. This poses a problem for succession planning if the current CFEW leaves. Also, complete coverage of HQ and satellite offices in the NCR during core working hours¹ is impossible for a single resource, the CFEW, as is the adequate provision of support and guidance to regional offices with time zone differences.

The Fire Emergency Organization (FEO) is described in TBS Standards for Fire Safety as comprising "employees who are normally employed in the building and shall be recruited on an

¹ HQ core hours are from 8:30 a.m. to 5:00 p.m.

equitable basis from staff of all occupying departments.” The FEO is staffed by “appointed” persons. In reality, the FEO comprises volunteers, drawn from managerial, supervisory, and staff ranks, who have a desire to serve and assist fellow employees and to maintain a safe work environment. The one exception is the CFEW who, as noted above, is a full-time managerial-level employee whose responsibilities include the Fire and Emergency Program. Furthermore, the standards state that “the fire emergency organization shall be established and administered by the senior officer.” The senior officer is the highest ranking official in the building. For the Department of Justice Headquarters, the senior officer is the Deputy Minister.

Key roles in the Department of Justice Headquarters FEO include:

- Deputy Minister – senior officer, responsible for establishing and administering the FEO;
- Chief Fire Emergency Warden (CFEW) – responsible for the Fire and Emergency Program for all NCR buildings and for providing guidance to the regions;
- Deputy Chief Fire Emergency Warden (D/CFEW) – provides back-up in the absence of the CFEW;
- Chief Floor Fire Emergency Wardens (CFFEW) – responsible for an assigned floor area;
- Deputy Chief Floor Fire Emergency Wardens (D/CFFEW) – assists CFFEW;
- Floor Fire Emergency Wardens (FFEW) – conduct checks and evacuation procedures for a floor;
- Monitors (or “buddies”) – assigned to assist self-identified, mobility-impaired persons in evacuations.

We found that plans and strategies to shore up recruitment, retention, and participation of volunteers are lacking. Headquarters comprises two buildings (St. Andrew’s Tower (SAT) and East Memorial Building (EMB)) with 23 floors in total. At the time of the audit, the Fire Emergency Organization consisted of 78 named FFEWs (based on the number of listed contacts on the Department of Justice Intranet site) for the HQ complex. SAT has two exit stairwells (F and J) and 43 FEO members listed for 15 floors, or an average of 2.8 members per floor. EMB has four exit stairwells (A, B, C, and D) and 35 FEO members for eight floors, or an average of 4.4 members per floor. Although a FEO of 78 members represents a drop of 25% from the 2000 figure of 104 volunteers, the audit team is of the view that, given the size of the HQ complex and the number of exits, 78 is an appropriate number of FEO members to provide adequate coverage during an evacuation.

However, the actual number of volunteers at any given time may be considerably lower than the 78 counted. For example, four out of eight cold calls by the audit team to contacts listed on the EMB FEO list resulted in an invalid contact (e.g. different person, number out of service). Not surprisingly then, at an evacuation drill debriefing session on November 15, 2006, only 30 FEO

members were present (an estimated 38% of strength). Based on its discussions with Department personnel, the audit team is of the opinion that this number (30) is a reasonable proxy of the active volunteers in the HQ FEO. As a result, the HQ FEO is short approximately 48 (78-30) active members to achieve baseline strength for evacuation purposes.

Fire and Emergency Program training (provided by the CFEW) yielded attendance of merely 33% of available volunteers, according to the trainer. Interviewees who had taken the training were generally satisfied with the four-hour session. However, in a walkabout by the auditor during the November 15, 2006 evacuation drill, only 14 identifiable wardens (wearing program-supplied helmets and vests) were noted attending to crowd control, others having left the site or having removed their FFEW helmets and vests. This points to much needed changes in both the provision of training and overall supervision.

There is no volunteer recognition initiative in place in the Department to recognize or thank members of the FEO. Management acknowledged this fact and it was confirmed by a number of FFEWs. Volunteer recognition has long been held to be an effective way of encouraging recruitment, enhancing participation, and improving effectiveness. Recognition programs can be as simple and inexpensive as a personalized memo from the Deputy Minister, to more elaborate schemes of awards and rewards (e.g. for long-service, exemplary participation).

The future effectiveness of the FE Program is dependent on a trained and motivated cadre of Floor Fire Emergency Wardens. There is a risk that the Department may not be able to sustain an adequate level of staff and volunteer resources. The impact is that without detailed plans to ensure the ongoing effectiveness of FE through appropriate staff capacity and volunteer recruitment and retention, the safety of employees may be compromised.

Recommendations and Management Response

3. It is recommended that the Director, NAOHS develop a detailed human resources plan to address:

a) Resource capacity issues with respect to the FE Program.

Agree. The HR plan will identify alternates to the key roles of Chief and Deputy positions. (Target date: December 2008)

b) Recruitment and retention strategies (including volunteer recognition initiatives) for the FEO.

Agree. Recruitment and retention strategies in other departments need to be analysed and a best practice adopted to ensure that the organization is stable and the results will be reflected in the HR plan. Target date: December 2008 An annual appreciation ceremony will be arranged to acknowledge the good work and dedication of this volunteer organization. (Target date: March 2008)

c) Training of FEO volunteers to encourage greater participation in evacuation drills.

Agree. The FEO training session that is provided to the FEO volunteers will continue to be opened to all employees to seek increased participation, raise awareness and establish a broader pool of candidates for the BEO (Building Emergency Organization). (Target date: Annually)

4. It is recommended that the Director, NAOHS consider options for providing supervisory oversight during evacuation drills.

Agree. Management Sector will seek a senior officer(s) to oversee the evacuation drills of buildings in the NCR and attend the post mortems. Regional Senior Officers will be asked to endorse the same oversight practice. (Target date: February 2008)

2.4 Policies, Plans, and Procedures

Comprehensive and clearly documented policies, plans, and procedures that describe critical elements of the program are needed to ensure the efficiency and effectiveness of the FE program.

Documented policies, plans, and procedures on the Fire and Emergency Program provide information for building occupants to assist in staff awareness and training about safe evacuation procedures. In addition, clearly documented policies, plans, and procedures outline key roles and responsibilities as well as strategies and approaches for protecting employees. They also provide management with up-to-date information on the administration of the program. Detailed fire emergency plans give emergency responders (e.g. firefighters) critical, summarized information to successfully combat an active fire emergency or similar threat.

Evacuation plans and procedures are not finalized or kept current. The draft HQ Evacuation Plan requires finalization and management attention, particularly, as noted earlier, in regard to key roles and responsibilities. Fire evacuation plans do not define target times for building evacuation drills, thereby limiting assessment of evacuation effectiveness. The firefighters' copy of the Building Fire Evacuation Plan for HQ has not been updated in three years and requires immediate revision. Likewise, the adequacy of a fire safety plan for Information Technology (IT) computer rooms needs attention. For example, an emergency contact list, which is part of a fire safety plan, is tacked to the wall in the IT Production Server room and does not meet the minimum requirements of TBS standards. These state that "a fire safety plan for the computer room shall be prepared and posted."

Procedures are lacking to ensure that administrative documentation is completed and management reporting is formally undertaken. Visual inspections are a key part of the FE Program and are generally performed as required by the regulations. The auditors noted, however, a lack of formality in the recording of inspection details by the FEO. At the HQ complex, for example, visual inspections are evidenced through daily walkabouts by the CFEW. However, the audit team found that any observed issues are not well documented for follow-up. We found no formal activity reports or monthly summaries of this effort to provide input to management reporting. Procedures are required for the maintenance of Floor Fire Emergency Warden contact lists, as the listings are not current. In addition, fire inspections of IT areas cannot be effectively performed against minimum TBS standards, since required documents are not available. The relevant TBS standard regarding fire protection of computer equipment requires that the equipment be classified as either "essential to the operation of Government of Canada departments and agencies" or be deemed "not essential but of a value that warrants protection from the effect of fire". However, there was no listing of IT computer equipment appropriately classified into essential and non-essential items for fire protection purposes.

Furthermore, procedures for maintaining floor plans vary. NAOHS maintains plans on the Archibus System (a facilities management system), but the facilities management group in SOTAD uses its own record-keeping system. The NAOHS floor plans are not always synchronised with those of the facilities management group. Procedures are needed to standardize and keep any NAOHS floor plans up-to-date to ensure that fire emergency plans are consistent with facilities management plans.

Plans and procedures that are comprehensive and clearly documented, and that describe critical elements of the program and its administrative framework are essential to protect the safety of building occupants by describing critical elements of the program and its administrative framework. Without such plans and procedures, the effectiveness and efficiency of the program is in jeopardy.

Recommendations and Management Response

5. It is recommended that the Director, NAOHS, in collaboration with the Director, SOTAD, as required, undertake to:

- a) Revise and finalize evacuation plans and procedures including establishing time targets for building evacuation drills, updating the firefighters' copy of evacuation plans, and preparing and posting fire safety plans for IT computer rooms.**

Agree. The revision and finalization of the Building Emergency Plans (with mandatory evacuation drill timeframes clearly identified including updating the copy for the local fire department) is underway. (Target date: Annually)

IMIT has been asked by the CFEW to prepare and post their fire safety plans for computer rooms as per TBS Policy. (Target date: February 2008)

- b) Develop and implement procedures, where required, for management reporting and administration, including those for recording and reporting of inspection activity, keeping floor plans up-to-date, updating Floor Fire Emergency Warden contact lists, and reviewing IT equipment classification records.**

Agree. A structured recording process to manage all records, including IT equipment classification records will be sought and implemented. (Target date: May 2008)

2.5 Communications

The CFEW communicates actively and frequently with employees and FEO members at the HQ complex.

The current CFEW is well known within the HQ complex and more generally within the NCR.

The CFEW's role requires frequent walkabouts and inspections of potential fire hazards and first aid supplies. Personal contact is maintained whenever possible with FFEWs and Monitors during these tours. Awareness material related to the Fire and Emergency Program is posted to JusNet, supplemented by broadcast e-mails and articles in JustInfo.

In the opinion of the audit team, the CFEW's efforts at communications and contact with HQ staff, building management, and the FEO have been a benefit to the FE Program in the NCR.

An effective communications approach that is national in scope is required.

The Fire Emergency Organization, according to its stated mission, is committed to developing and maintaining a national program of services that is responsive, efficient, and effective for all employees, occupants, and visitors in the Department.

In practice, however, an effective national reach has not been achieved by the FE Program. Whenever possible the CFEW – the sole national contact for the FE Program – offers advice and guidance when requested by the respective OH&S coordinators and FEO members in the NCR and regionally. Reference material is also available on the FEO webpage on JusNet. Nevertheless, communication opportunities with the regions on FE issues are limited (e.g. the CFEW attends the annual Administrative Officers Conference), and when they occur, are generally informal. Managers in some regions (Ontario, Atlantic and Prairie) told us that they would like more procedural material, such as checklists, as well as professional support and expertise in dealing with private sector building owners. There is little formal sharing of FE Program performance or management information between regions and HQ, and hence, no capability to communicate or monitor results Department-wide.

Horizontal communications also require attention, as the FE Program cannot operate without close cooperation with many other groups within the Department. For example, communications with the DSO's security staff and commissionaires are essential before, during, and after evacuation exercises. We were told that Security considers its role during evacuations to be to informally support the FE Program, which includes assisting the FEO during evacuations by assuming responsibilities for access control (i.e. manning doors and securing the perimeter). However, as noted earlier, there is a need to clarify and formalize this role. In addition, the program needs to communicate national standards to the regional offices to ensure that requirements of the National Fire Code of Canada are formally and consistently applied across the country. This requires communication and collaboration with both Contraventions and Contracts Management Division (CCMD) and PWGSC to establish standard clauses on federal fire code requirements in accommodation contracts with building owners.

An effective communications approach that is national in scope is essential for providing Department-wide leadership for the FE Program. Without this, the effectiveness of the FE Program for the Department is at risk.

Recommendations and Management Response

- 6. It is recommended that the Director, NAOHS, implement measures to improve communications in relation to the FE Program to achieve the level of national leadership required and to ensure the program's effectiveness.**

Agree. A briefing note from the ADM, Management Sector will be prepared to ensure that Senior Officers and the FE networks understand their leadership roles and responsibility. (Target date: December 2008)

Annual meeting will be held to bring the FE network up to date and maintain stability and provide any necessary training. The regional security coordinator positions will (July 25) reflect the FE function. (Target date: Spring 2008)

2.6 Performance Management

Plans and procedures for evaluating and reporting on the effectiveness of the FE Program are required.

Written plans and procedures for measuring and evaluating the FE Program provide an objective assessment of the program's contribution to government and departmental goals to ensure the health and safety of employees in a fire emergency.

While formal written reports were submitted at the conclusion of evacuation drills and annual inspections, at the time of the audit the FE Program had not defined, proposed, or implemented formal management reporting requirements. Little ongoing feedback is obtained on program effectiveness, except for what is acquired from evacuation drills, FEO debriefing sessions, and individual communications. For example, as noted earlier, there are no time targets for evacuation drills against which to monitor evacuation success. In addition, although frequent visual inspections are diligently undertaken, the audit team found no formal activity reports or monthly summaries of this effort.

A key part of the FE Program for headquarters—and a key success indicator—is the annual evacuation drill. Every effort is taken to ensure that occupants, stakeholders, and FEO members are aware of the time and date of the impending drill. For example, this exercise is widely pre-announced by successive e-mails, lobby posters, and JusNet postings. Audit staff present during the November 15, 2006 evacuation exercise at HQ observed that some staff exited the floor in a highly leisurely manner. Perhaps this occurred because the evacuation was seen as a drill and not

“real”. Furthermore, FFEWs later reported incidents such as staff waiting for the completion of an incoming fax and others hesitating in the midst of a conference call. FFEWs also noted that employees were exiting down stairwells carrying file folders and beverages, thereby placing themselves and others at risk. The CFEW indicated that these are recurrent events during evacuation drills at HQ. In our view, staff ambivalence or apathy during the evacuation drill is a serious safety awareness issue. The audit team is of the view that the Department should consider the benefits of holding more frequent fire evacuation exercises that have not been pre-announced.

We found no benchmarks to assess the FEO response during evacuations. As mentioned earlier, the audit team observed that too few members of the FEO were physically present at the safety perimeter for crowd management duties during the drill. As a result the 100-metre safety perimeter was not enforced by the FEO, and a loudhailer, available atop the commissionaire’s desk, was not used to advise the evacuees to move back. The ability of the FEO to effectively and efficiently respond to floor evacuations, identify and correct risk behaviours, and provide marshalling measures for evacuees is an important indicator of FE Program performance.

The lack of a rigorous process for management and performance reporting for the FE Program limits management’s ability to respond to issues in fire safety through the implementation of risk mitigation measures. Furthermore, specific operational adjustments to evacuation exercises are needed. For example, the CFEW could consider declaring an “evacuation failure” when evacuees do not clear the safety perimeter or the target evacuation time is exceeded, and possibly undertake a subsequent, unannounced follow-up drill. Similarly, evacuees leaving with file folders or beverages should be directly reported to the senior officer. Other adjustments would include all FEO members staying “on duty” with FFEWs mustering at a reporting station, until the evacuation has been completed.

Recommendations and Management Response

7. It is recommended that the Director, NAOHS, develop and implement plans and procedures for measuring, evaluating, and reporting on the FE Program.

Agree. Other government departments’ plans and procedures for measuring, evaluating and reporting on the FE program will be analysed and a best practice adopted. (Target date: February 2008)

8. It is recommended that the Director, NAOHS:

- a) require the CFEW to assign specific responsibility for the custody and use of loudhailers/megaphones at evacuations to ensure evacuees adhere to the required safety perimeter;**
- b) in conjunction with the CFEW and senior management, consider the benefits of holding more frequent fire evacuation exercises that are not pre-announced.**

Agree. The Director will ensure that the responsibilities of the FE members reflect the equipment requirements and that evacuation exercises are held according to proper protocols. (Target date: January-February 2008)

3. OBSERVATIONS, RECOMMENDATIONS AND MANAGEMENT RESPONSE

The roles and responsibilities of participants in the FE Program require clarification.

1. It is recommended that the Director, NAOHS seek senior management support to:8

a) Appoint a D/CFEW within the NAOHS Division.

Agree. The Deputy CFEW position is currently held by the Manager, Clients Services for the NCR. The Security and NAOHSD organizations are both being reviewed which could result in the re-alignment functions and increased efficiencies. (Target date: January 2008)

b) Establish formal terms of reference for the D/CFEW.

Agree. The Building Emergency Organization Committee needs to be formally established with Terms of Reference. One of the key deliverables of this committee will be to obtain agreement on the roles and responsibilities of the Chief and Deputy Chief positions. (Target date: February 2008)

c) Change the title of the Manager, National Emergency Preparedness and Departmental Special Programs to reflect a “Fire Emergency” role.

Agree. The Title of the position responsible for the National Fire and Emergencies organization could be changed to Manager, National Fire Emergency Programs to reflect the scope of fire and other emergency duties required. (Target date: December 2007)

2. It is recommended that the Director, NAOHS obtain agreement with the Departmental Security Officer on shared and lead roles in evacuations.9

Agree. The Director of SOTAD and the Director of NAOSHD will work together with the Director General, Administration Directorate to ensure that the roles and responsibilities are clearly articulated. Re-alignment of functions may expedite this requirement. (Target date: February 2008)

The integration of the FE Program and procedures within the Occupational Health and Safety (OH&S) environment increases the effectiveness of compliance efforts.

No recommendation.

Planning strategies to address issues with respect to staff capacity, recruitment and retention, and training are not evident.

3. It is recommended that the Director, NAOHS develop detailed a human resources plan to address:.....12

a) Resource capacity issues with respect to the FE Program.

Agree. The HR plan will identify alternates to the key roles of Chief and Deputy positions. (Target date: December 2008)

b) Recruitment and retention strategies (including volunteer recognition initiatives) for the FEO.

Agree. Recruitment and retention strategies in other departments need to be analysed and a best practice adopted to ensure that the organization is stable and the results will be reflected in the HR plan. Target date: December 2008 An annual appreciation ceremony will be arranged to acknowledge the good work and dedication of this volunteer organization. (Target date: March 2008)

c) Training of FEO volunteers to encourage greater participation in evacuation drills.

Agree. The FEO training session that is provided to the FEO volunteers will continue to be opened to all employees to seek increased participation, raise awareness and establish a broader pool of candidates for the BEO (Building Emergency Organization). (Target date: Annually)

4. It is recommended that the Director, NAOHS consider options for providing supervisory oversight during evacuation drills.....13

Agree. Management Sector will seek a senior officer(s) to oversee the evacuation drills of buildings in the NCR and attend the post mortems. Regional Senior Officers will be asked to endorse the same oversight practice. (Target date: February 2008)

Comprehensive and clearly documented policies, plans, and procedures that describe critical elements of the program are needed to ensure the efficiency and effectiveness of the FE program.

5. It is recommended that the Director, NAOHS, in collaboration with the Director, SOTAD, as required, undertake to:15

- a) Revise and finalize evacuation plans and procedures including establishing time targets for building evacuation drills, updating the firefighters' copy of evacuation plans, and preparing and posting fire safety plans for IT computer rooms.**

Agree. The revision and finalization of the Building Emergency Plans (with mandatory evacuation drill timeframes clearly identified including updating the copy for the local fire department) is underway. (Target date: Annually)

IMIT has been asked by the CFEW to prepare and post their fire safety plans for computer rooms as per TBS Policy. (Target date: February 2008)

- b) Develop and implement procedures, where required, for management reporting and administration, including those for recording and reporting of inspection activity, keeping floor plans up-to-date, updating Floor Fire Emergency Warden contact lists, and reviewing IT equipment classification records.**

Agree. A structured recording process to manage all records, including IT equipment classification records will be sought and implemented. (Target date: May 2008)

The CFEW communicates actively and frequently with employees and FEO members at the HQ complex.

No recommendation

An effective communications approach that is national in scope is required.

- 6. It is recommended that the Director, NAOHS, implement measures to improve communications in relation to the FE Program to achieve the level of national leadership required and to ensure the program's effectiveness.17**

Agree. A briefing note from the ADM, Management Sector will be prepared to ensure that Senior Officers and the FE networks understand their leadership roles and responsibility. (Target date: December 2008)

Annual meeting will be held to bring the FE network up to date and maintain stability and provide any necessary training. The regional security coordinator positions will (July 25) reflect the FE function. (Target date: Spring 2008)

Plans and procedures for evaluating and reporting on the effectiveness of the FE Program are required.

- 7. It is recommended that the Director, NAOHS, develop and implement plans and procedures for measuring, evaluating, and reporting on the FE Program.....18**

Agree. Other government departments' plans and procedures for measuring, evaluating and reporting on the FE program will be analysed and a best practice adopted. (Target date: February 2008)

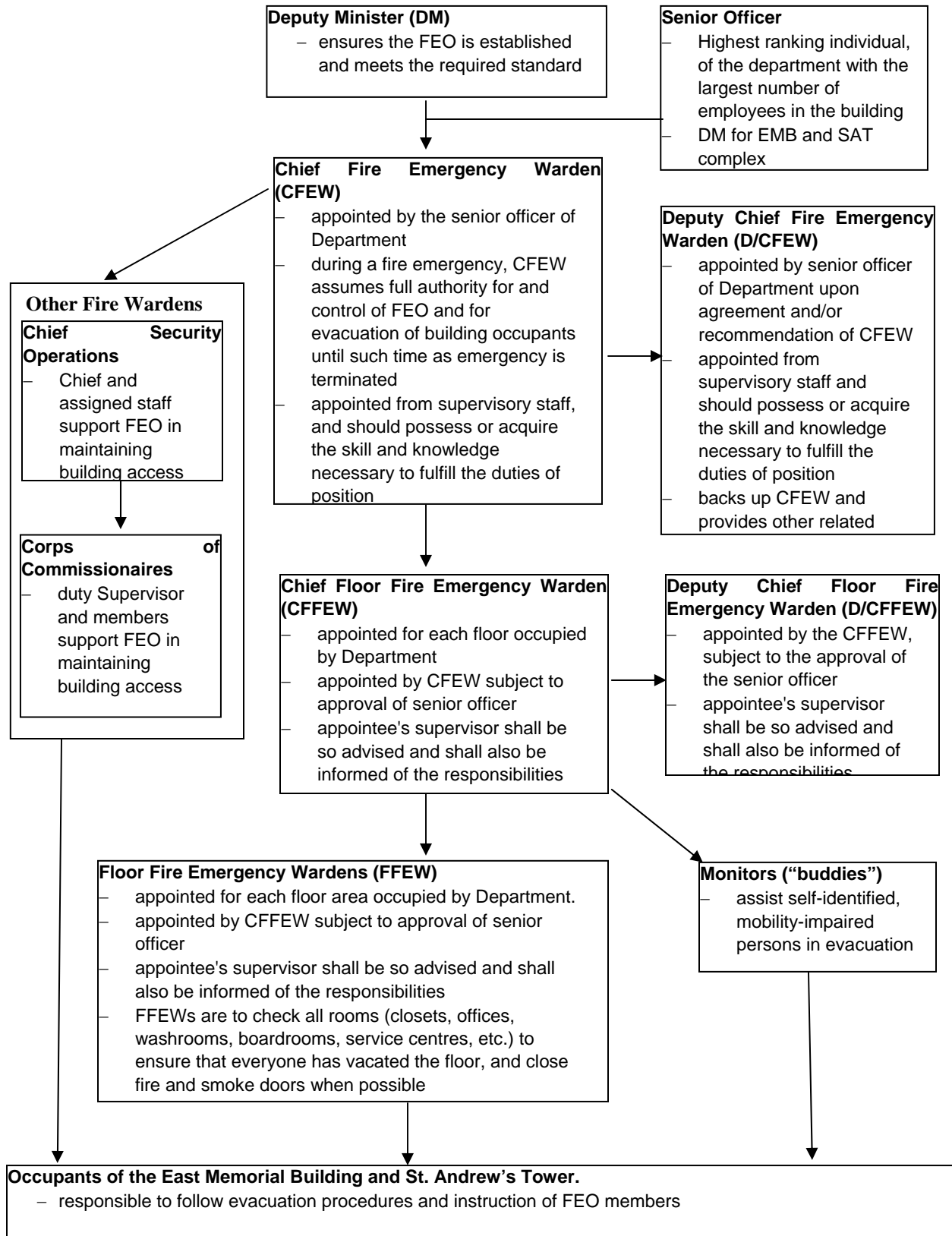
- 8. It is recommended that the Director, NAOHS: 19**

- a) **require the CFEW to assign specific responsibility for the custody and use of loudhailers/megaphones at evacuations to ensure evacuees adhere to the required safety perimeter;**
- b) **in conjunction with the CFEW and senior management, consider the benefits of holding more frequent fire evacuation exercises that are not pre-announced.**

Agree. The Director will ensure that the responsibilities of the FE members reflect the equipment requirements and that evacuation exercises are held according to proper protocols. (Target date: January-February 2008)

APENDIX A – Fire Emergency Organization (FEO)

(Note: This chart illustrates the functions of the component authorities and proposed reporting relationship with other fire wardens.)



APPENDIX B – Audit Methodology

The methodology for the audit consisted of:

- a risk-based analysis of the management control framework;
- a review of relevant policies at the departmental and central agency level;
- interviews with the Director, NAOHS and the Manager, National Emergency Preparedness and Departmental Special Programs (CFEW);
- telephone interviews with supervisory and management staff in Ontario and Atlantic regional offices;
- interview with Regional Head, Administrative Services, Prairie Regional Office;
- interviews with the Director and managers from Security Operations; Telecommunications and Accommodations Division, including the Manager, Client Services (D/CFEW);
- interview with Co-Chair of building Workplace Safety Committee;
- interview with property management company's building manager;
- telephone interviews with a sample of FEO members in Headquarters;
- a review and analysis of approximately 60 pertinent documents and photos;
- a walkabout to observe inspection procedures;
- observation and walkabout during evacuation drill.