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2007-717

Final Report

Follow-up Audit of PWGSC Compliance to Departmental Policy 078 on Workplace Emergency Evacuation Plans

Audit and Evaluation Branch

2007-11-01



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MAIN POINTS

What was examined

The auditors examined the same five buildings that were audited as part of the 2005 audit- buildings in the National Capital Area where the Deputy Minister of PWGSC has accountability for fire emergency evacuation plans covered by both the Treasury Board of Canada Standard 3-1 and PWGSC Departmental Policy (DP) 078.

As was the case in the 2005 audit, the audit objective did not include an examination of the impacts of utilizing Alternate Forms of Delivery service providers.

An examination was done of:

- compliance with DP 078- Workplace Emergency Evacuation Plans;
- fire emergency evacuation plans and procedures;
- evacuation drills;
- training for emergency preparedness; and
- corporate oversight and monitoring.

This follow-up audit was conducted from June to August 2007, and included an examination of management practices since the previous audit ended in August 2005 to March 31, 2007.

Why it is important

Fire emergency preparedness is an established policy and system to deal with potential dangerous incidents and accidents that occur in government buildings. Effective emergency plans offset panic and indecision, and replace it with purposeful action during an emergency.

Fire emergency preparedness is a complex health and safety issue. Ensuring compliance with Departmental Policy 078 –Workplace Emergency and Evacuation Plans is a shared responsibility among a large number of individual players. The complexity and shared responsibility among so many individuals increases the level of difficulty of managing this area and ensuring compliance.

Previous work undertaken by the Audit and Evaluation Branch on the department's compliance with Departmental Policy 078 identified compliance and control weaknesses with requirements for workplace emergency evacuation plans in the buildings selected for audit.

What was found

PWGSC has made limited progress in implementing the recommendations from the 2005 internal audit to meet the requirements of government and departmental policies. Specifically:

- Fire emergency evacuation plans contained most, but still did not contain all, of the required information specified in Departmental Policy 078;
- Only three of the five buildings are holding fire drills once a year, as required by [Canada Occupational Health and Safety Regulations](#), Part XVII Safe Occupancy of the Work Place, Section 17.10.1 (b);
- Fire safety plans were not always current and were not prepared in cooperation with the local fire department as required by Treasury Board Standard 3-1.
- Training is not delivered consistently to all those who need it;
- The policy discrepancy between PWGSC's Departmental Policy 078 and Treasury Board Standard 3-1 still exists without resolution; and
- No formal action has taken place concerning governance.

Due to the lack of progress in implementing management actions, it is not possible to conclude that the desired result is in place to deal with potential emergencies.

The auditors recommend that the Assistant Deputy Minister, Corporate Services, Policy and Communications Branch, undertake immediate steps to address all remaining deficiencies and implement fully all 2005 internal audit recommendations related to the following areas:

- Revise Departmental Policy 078 - Workplace Emergency Evacuation Plans (April 2000), in accordance with the Treasury Board Secretariat Standard 3-1, [Standard for Fire Safety Planning and Fire Emergency Organizations](#), so that it is compatible with government policy;
- Identify and implement requirements for corporate oversight and monitoring to ensure compliance with central agency and departmental requirements;
- Ensure that fire emergency evacuation plans, including building schematics and floor diagrams, contain all of the required information specified in Departmental Policy 078;
- Ensure that building fire safety plans are maintained up-to-date and prepared in cooperation with local fire departments as required by Treasury Board Standard 3-1;
- Ensure that yearly evacuation or emergency drills are conducted and are adequately documented and reported; and
- In consultation with the Associate Deputy Minister, Real Property Branch, ensure that specific mandatory training for fire emergency evacuation planning and fire drills is undertaken as prescribed.

Management Response

I agree with the findings and six recommendations outlined in the Follow-up Audit of PWGSC Compliance to Departmental Policy 078 on Workplace Emergency Evacuation Plans. We have produced, in collaboration with our colleagues in RPB, a management action plan that includes the review of Departmental Policy 078, development of a governance profile, joint Corporate Services, Policy and Communications Branch and Real Property Branch monitoring of the program, a more formalized process for conducting fire drills and reporting on them, as well as more training for building emergency organizations.

INTRODUCTION

The follow-up audit was undertaken to provide assurance that PWGSC management actions in response to the 2005 internal audit (Audit of PWGSC Compliance to Departmental Policy 078 - Workplace Emergency Evacuation Plans) have been effectively implemented and are achieving the desired result.

BACKGROUND

Departmental Policy 078 outlines the requirements for workplace emergency evacuation plans, including fire evacuations. As the employer, the Deputy Minister is responsible for all activities to effect compliance with regulations governing emergency evacuation plans for PWGSC employees. As a custodian the Deputy Minister is responsible for the protection of real property in Crown-owned building under the control and administration of PWGSC.

The audit completed in 2005 assessed the extent to which PWGSC complied with workplace emergency evacuation plans in Crown-owned buildings under departmental administration. As a result of audit recommendations made at that time, senior management developed a management action plan that was approved by the Audit and Evaluation Committee in September 2006. The Corporate Services, Policy and Communications Branch has reported on the status of implementation of management actions on a quarterly basis.

The Health, Safety, Security, Emergencies and Administration Sector of the Corporate Services, Policy and Communications Branch is responsible for services related to accommodation, emergency preparedness, environment, health and safety, security, information management, investigations, and materiel management. The Sector also informs employees about their role to ensure workplace health, safety and security as well as sound information management.

The accountability for the management of the day-to-day operation, maintenance and repair of federal office buildings and specialized facilities for PWGSC and other government custodial departments (when agreements are in place) is undertaken by asset and facilities management staff within Real Property Branch. In 1997, RPB outsourced some of its property management services within part of its portfolio of Crown-Owned buildings to Alternative Forms of Delivery Providers. PWGSC retained all custodial and employer accountabilities for the Alternative Forms of Delivery managed buildings within its portfolio.

Appendix 1 illustrates the complexity of emergency preparedness among a large number of active participants and stakeholders.

PWGSC is expected to comply with the following regulations and standards: (i) Canada Labour Code - Part II; (ii) Regulations Respecting Occupational Safety and Health Made

Under Part II of the Canada Labour Code (CLC Regulations); (iii) Treasury Board of Canada Standard 3-1, [Standard for Fire Safety Planning and Fire Emergency Organizations](#); and (iv) PWGSC Departmental Policy 078, Workplace Emergency Evacuation Plans.

FOCUS OF THE AUDIT

The follow-up audit focused on the management actions taken to address the recommendations from the 2005 Audit of PWGSC Compliance to Departmental Policy 078 Workplace Emergency Evacuation Plans and included an examination of management practices since the previous audit ended in August 2005 to March 31, 2007.

OBSERVATIONS

1. Fire emergency evacuation plans contained most, but not all of the required information specified in Departmental Policy 078.

A fire emergency evacuation plan contains evacuation procedures. The evacuation plan provides instructions for building occupants, including visitors, to enable them to take appropriate measures to safely leave the building in the event of an emergency. These plans help ensure all the building's occupants can safely evacuate buildings in the event of a fire.

We expected to find that departmental officials had reviewed the facility plans where PWGSC is the owner/custodian and primary tenant to ensure that all emergency evacuation plans are up-to-date and contain all required information specified in Departmental Policy 078 (Annex A, Section 1 Emergency Evacuation Plans, and Section 2 Emergency Procedures for Fire) by the end of fiscal year 2006/2007 as indicated in the management action plan.

In 2005, we found that four of the five facilities had readily accessible fire emergency evacuation plans that complied with 46 percent of the required information outlined in Annex A, Sections 1.3, of Departmental Policy 078. The identification and management control of fire hazards was a particular area of concern.

In 2007, we found that all five facilities now have fire emergency evacuation plans and that these plans complied with 63 percent of all current requirements. The increase in compliance is mainly due to updated emergency evacuation plans in four of the five buildings. We also found that:

- Four out of five of the emergency evacuation plans were readily accessible on-site.
- One building had a fire emergency evacuation plan that was majority compliant with Departmental Policy 078.

- Four buildings had a fire emergency evacuation plan that partially complied with Departmental Policy 078.
- Plans still did not have sufficient information on the identification and management control of fire hazards in the building.

The auditors found the same deficiencies in fire emergency plans, as in the 2005 audit:

- Three of the five buildings had no list of personnel requiring special assistance;
- Control of fire hazards, including hazardous materials, was not always clearly identified (i.e., type of hazard, location, quantity, and containment method(s));
- Schematic diagrams for the floors at four of the five buildings were up-to-date and showed the type and location of all fire protection equipment in the building. One building we examined had not posted schematic diagrams in the elevator lobby or adjacent to any exit stairwell. Since the examination phase of the current audit, Health Canada has become the major occupant of this building. Responsibility for Fire Emergency and Evacuation Plans rests with Health Canada as per Treasury Board Standard 3-1; however, departmental policy assigns responsibility to PWGSC, regardless of occupancy; and
- The content of the plans had not been regularly reviewed to ensure their accuracy, continued relevance, and completeness. For example, 79 of 223 floor wardens listed in the emergency evacuation plan at Place du Portage Phase III have identified themselves as being inactive. PWGSC officials indicated that one reason for this is the high rate of employee relocation in the building (30 to 40 percent churn rate).

Some progress has been made with regards to ensuring that fire emergency evacuation plans, including building schematics and floor diagrams, contain all of the required information specified in Departmental Policy 078. However, further effort is required to address remaining areas of non-compliance.

2. Yearly evacuation or emergency drills were not always conducted, adequately documented and reported.

Yearly evacuation or emergency drills provide an opportunity to practise the evacuation of a building for fire or other emergency. It is important to perform these drills as though a real emergency has occurred to measure the time it takes occupants to evacuate a building to ensure that the evacuation is completed within a reasonable length of time.

We expected to find that evacuation or emergency drills were conducted, adequately documented and reported in all facilities where PWGSC is the primary tenant as required by Departmental Policy 078 (Annex A, Section 3 Building Emergency Organizations (BEO), Part 3 Evacuation Drills). The management action plan approved by the Audit and Evaluation Committee indicated that evacuation or emergency drills would be complete for all buildings by end of fiscal year 2006/2007.

In 2005, we found that of the three buildings that held fire drills, none had documented the length of time required to evacuate the building. Two of the three buildings had not produced drill reports containing base information required by [Canada Occupational Health and Safety Regulations](#), Part XVII Safe Occupancy of the Work Place, Section 17.10.1 (b).

In 2007, we found that three of the five buildings are holding fire drills once a year, as required by [Canada Occupational Health and Safety Regulations](#). Of the two buildings that did not conduct evacuation or emergency drills, one had not had a fire drill since May 2003, while the other is a conference centre where occupant may not be prepared for potential evacuation. This finding has remained unchanged since the 2005 audit.

We also found that of the three buildings that held fire drills, all three drill reports contained base information required by [Canada Occupational Health and Safety Regulations](#) (i.e. the date and time of the drill; and where applicable, the length of time taken to evacuate the building). However, the extent of drill report documentation continues to vary greatly building to building. Some reports consisted of short hand written notes, while others prepared elaborate detailed reports. A reporting template to be used by all PWGSC buildings where PWGSC employees are the primary tenants, would improve the consistency and quality of drill reports.

While progress has been made with regards to adequately documenting and reporting on drills, two out of five buildings still have not complied with the [Canada Occupational Health and Safety Regulations](#) to conduct an evacuation drill once a year.

3. Building fire safety plans were not always current as required by Treasury Board Standard 3-1.

A building safety plan/fire emergency evacuation plan provides instructions to building occupants, including visitors, to enable them to take appropriate measures to safely leave the building before the situation becomes dangerous. These plans help ensure all the building's occupants can safely escape the dangers of a fire. Plans should be prepared in cooperation with local fire departments and maintained up-to-date to ensure that the personnel responding to an emergency situation are familiar with the established procedures in order to provide a timely and efficient response.

We expected to find building fire safety plans prepared in cooperation with the local fire department. While not required by Departmental Policy 078, this is a requirement of Treasury Board Standard 3-1, and a management action was developed in 2005 to address this issue.

In 2005, we observed that building fire safety plans were often not prepared in cooperation with the fire department and as prescribed by the Canada Labour Code, Part II. In addition, these plans were often not reviewed, signed by the senior officer

responsible for the building, nor up-to-date. As a result, these plans did not accurately reflect the current state of the buildings' fire emergency preparedness.

In 2007, we found the following with regard to compliance with Treasury Board Standard 3-1:

- Three buildings had fire safety plans dated from 2005 to 2006 that were accepted by the Fire Prevention Office of Ottawa Fire Services. The other two buildings did not prepare a plan in cooperation with the local fire department.
- Only one of the five fire safety plans was reviewed and signed by the responsible senior officer. This plan was signed in December 2003.
- Two buildings submitted their fire safety plans to the Human Resources and Social Development Canada – Labour Program (formerly known as the Office of the Fire Commissioner of Canada) in 2006.

While most fire safety plans have current dates, the plans were not prepared, signed and submitted in accordance with Treasury Board Standard 3-1.

4. Mandatory training for fire emergency evacuation planning and fire drills was not fully undertaken as prescribed.

Mandatory training for fire safety planning and evacuation procedures ensures that the personnel involved in the process are aware of their roles and responsibilities in the event of an emergency situation and that they are prepared to contribute to a timely and effective evacuation that minimizes the risks to life and property.

In the June 2007 Management Action Plan Quarterly Report, Corporate Environment, Health and Safety identified several actions as being “in progress”. As a result, we expected to find that some progress had been made with regards to the following items:

- Real Property, with Health, Safety, Security, Emergencies and Administration Directorate, Corporate Environment, Health and Safety would have provided training to all individuals as identified through their planning process; and
- Real Property, in accordance with Health, Safety, Security, Emergencies and Administration Directorate, Corporate Environment, Health and Safety would have evaluated the current status of training and raised awareness for meeting the requirement with Alternate Forms of Delivery Contract Administration.

In 2005, we found that there were some training weaknesses. Officers responsible for preparing building fire emergency plans were not adequately aware or understood the requirements and their responsibilities. Follow-up work in 2007 found the same weaknesses.

In addition, we examined the extent of three types of mandatory training for emergency preparedness. The follow-up did not assess the quality of the training that is provided.

We found:

- **Floor Warden Training** - 2 of the 5 buildings offer formal floor warden training. At Place du Portage Phase III, 84 percent of the active floor wardens have been trained.
- **EX Level Training** - 1 of the 5 buildings offered formal training for the Executive "EX" group. Of the 337 identified population, only 69 have been trained (68 of these people were trained in the last year).
- **Alternative Forms of Delivery Training** - 4 of the 5 buildings are managed by Alternative Forms of Delivery. There was no formal emergency evacuation training provided to the AFD staff for these buildings.

We found that training is not always delivered consistently to those who need required training.

5. Departmental Policy 078, Workplace Emergency Evacuation Plans has not been amended so that it is compatible with government policy.

As reported in their June 2007 quarterly status of the implementation of management actions, we expected to find that the Corporate Services, Policy and Communications Branch had amended Departmental Policy 078 to be compliant with government policy by the end of fiscal year 2006/2007.

Since 2001, a policy discrepancy has existed between PWGSC's Departmental Policy 078 - Workplace Emergency Evacuation Plans, and Treasury Board's Standard 3-1- Standard for Fire Safety Planning and Fire Emergency Organization. The difference centers around the assignment of responsibility for the preparation and maintenance of emergency evacuation plans.

Treasury Board Standard 3-1 assigns responsibility to prepare and administer a fire safety plan to the senior officer (highest ranking official of any department or agency occupying space in a building). In buildings occupied by a number of departments, the senior officer of the department having the greater number of employees is responsible for the preparation and administration of the fire safety plan. Compliance to this standard means that PWGSC is responsible only for those buildings where the department is the custodian, occupant and primary tenant. However, PWGSC's Departmental Policy 078 states that PWGSC shall develop emergency evacuation plans for all facilities under its control and administration.

In government buildings, Treasury Board Standard 3-1 requires senior managers of major occupying departments to submit signed fire safety plans to the District Office of Labour Canada for review and acceptance prior to implementation. PWGSC's Departmental Policy 078 does not include this requirement.

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In all other jurisdictions (provinces, territories, municipalities), building owners are required to comply with the requirements outlined in section 2.8 of the National Fire Code of Canada. Compliance to this national code provides for a coordinated approach to responding to emergencies in buildings by placing the responsibility for emergency planning on the building owner in consultation with local fire/emergency first responders. In addition, it does not require that building emergency evacuation teams be established and maintained.

Senior Policy Analysts at the Treasury Board Secretariat insist that Treasury Board Standard 3-1 be referenced in PWGSC's Departmental Policy 078 and that the Policy be revised to state that in buildings that are occupied by a number of departments, the senior officer of the department having the largest number of employees shall be responsible for the preparation and administration of the fire safety plan. The policy discrepancy has not been resolved.

This issue has been brought to the attention of the Joint National Health and Safety Policy Committee as well as the then Deputy Minister of PWGSC. [

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]. At the request of the Joint National Health and Safety Policy Committee, an inter-branch and employee representative working group was established in August 2006 to review the findings, conclusions and audit recommendations related to PWGSC's Departmental Policy 078. A consensus could not be reached concerning whether or not PWGSC's Departmental Policy 078 should include reference to Treasury Board Standard 3-1.

In June 2007, the Occupational Health and Safety Group at the Treasury Board Secretariat distributed a draft revised standard on Building Emergency Response Organizations to the principal Occupational Health and Safety Coordinator in departments and agencies. This standard replaces Treasury Board Standard 3-1, however, the revisions suggested to this standard do not change the assignment of responsibility to the building owner/custodian for preparing and maintaining emergency evacuation plans.

As reported in their June 2007 quarterly status of the implementation of management actions, we expected to find that the Corporate Services, Policy and Communications Branch had amended Departmental Policy 078 to be compliant with government policy by the end of fiscal year 2006/2007.

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The policy discrepancy between PWGSC's Departmental Policy 078 and Treasury Board Standard 3-1 is unresolved.

6. Requirements to identify and implement corporate oversight and monitoring to ensure compliance with central agency and departmental requirements have not been established.

Good governance requires that governing bodies and their staff: (i) possess the necessary knowledge, ability, and commitment to fulfill their responsibilities; (ii) understand their purposes and whose interests they represent; (iii) understand the objectives and strategies of the organization they govern; (iv) understand what constitutes reasonable information for good governance and obtain it; (v) once informed, are prepared to ensure that the organization's objectives are met; and (vi) provide credible information against objectives in a timely manner.

Sound governance refers to the process and structure for overseeing the direction and management of an organization or function so that it carries out its mandate and objective effectively.

We expected to find a governance structure with associated performance indicators that had been communicated to all stakeholders. The Management Action Plan approved by the Audit and Evaluation Committee in response to the 2005 audit indicated that a governance structure, with associated performance indicators, would be completed by the end of fiscal year 2006/2007.

During the follow-up examination phase, the auditors could not find evidence that the Health, Safety, Security, Emergencies and Administration Directorate had established a governance structure and performance indicators. Consequently, all other elements were absent. Subsequent to the examination phase, a governance structure was established and provided to the auditors for consideration.

The governance structure contains some initial thoughts on governance arrangements, but most of the items we expected to find were not present.

CONCLUSIONS

PWGSC has made limited progress in implementing the recommendations from the 2005 internal audit to meet the requirements of government and departmental policies related to: fire emergency evacuation plans; fire drills; fire safety plans; training; policy discrepancy; and governance. Therefore, we cannot provide assurance that all necessary and required action has been taken over the past two years.

If the current policy is not revisited, the department will not be in full compliance with required standards and it will be difficult to implement the corrective management actions from the 2005 audit. As a result, PWGSC's risk exposure will continue.

Implementation of attributes such as an approved governance structure, clarity, compliance with regulations, sufficient monitoring and policy revision will go a long way to making such an environment operational.

RECOMMENDATIONS

The follow-up audit makes six recommendations.

The Assistant Deputy Minister, Corporate Services, Policy and Communications Branch undertake immediate steps to address all remaining deficiencies and fully implement all 2005 internal audit recommendations related to the following areas:

- revise Departmental Policy 078, Workplace Emergency Evacuation Plans (April 2000), in consultation with the Treasury Board Secretariat Standard 3-1- [Standard for Fire Safety Planning and Fire Emergency Organizations](#), and so that it is compatible with government policy;
- identify and implement requirements for corporate oversight and monitoring to ensure compliance with central agency and departmental requirements;
- ensure that fire emergency evacuation plans, including building schematics and floor diagrams, contain all of the required information specified in Departmental Policy 078;
- ensure that building fire safety plans are prepared in cooperation with the local fire department as required by Treasury Board Standard 3-1;
- ensure that yearly evacuation or emergency drills are conducted and are adequately documented and reported; and
- in consultation with the Associate Deputy Minister, Real Property Branch, ensure that specific mandatory training for fire emergency evacuation planning and fire drills are undertaken as prescribed.

ABOUT THE AUDIT

Objectives

The objective of the follow-up audit was to provide assurance that PWGSC management actions in response to the 2005 internal audit (Audit of PWGSC Compliance to Departmental Policy 078 - Workplace Emergency Evacuation Plans) have been effectively implemented and are achieving the desired result.

Scope and Approach

This follow-up audit was conducted from June to August 2007, and included an examination of management practices since the previous audit ended in August 2005 to March 31, 2007.

The auditors examined the same five buildings that were audited as part of the 2005 audit- buildings in the National Capital Area where the Deputy Minister of PWGSC has accountability for fire emergency evacuation plans covered by both the Treasury Board of Canada Standard 3-1 and PWGSC Departmental Policy (DP) 078. In the National Capital Area, PWGSC owned, managed and was the primary tenant of nine buildings. The five largest buildings were selected for audit, representing a total of 4,772 PWGSC employees (528 more than the 2005 audit), or 98.8% of the total number employees occupying those buildings. The buildings examined were:

- Place du Portage, Phase III (4,179 PWGSC employees);
- King Edward Building (379 PWGSC employees);
- Birks Building (119 PWGSC employees);
- Plouffe Park (64 PWGSC employees); and
- Conference Centre (31 PWGSC employees).

As was the case in the 2005 audit, the audit objective did not include an examination of the impacts of utilizing Alternate Forms of Delivery service providers.

This audit was conducted in accordance with the Treasury Board Policy on Internal Audit and the Government of Canada's Standards for Internal Auditing. The auditors prepared audit findings and validated the findings and conclusions with appropriate departmental senior management, prior to preparation of the final report.

Criteria

The following audit criteria were reviewed and accepted by Corporate Services, Policy and Communications Branch, Real Property Branch, and Treasury Board Secretariat prior to the 2005 audit.

Criteria 1: Fire emergency plans and procedures for Crown-owned buildings are compliant with the following elements of Departmental Policy 078.

Sub-Criteria:

- Compliance with Annex A, Section 1 Emergency Evacuation Plans and Section 2 Emergency Procedures for Fire.
- Compliance with Annex A, Section 3 Building Emergency Organizations (BEO), Part 3 Evacuation Drills.

Criteria 2: Fire emergency plans for Crown-owned buildings comply with Treasury Board's Standard 3-1 Section 2.3 which states "Review and acceptance which states (a) The fire safety plan is to be prepared in cooperation with the fire department. (b) The fire safety plan shall be reviewed and signed by the senior officer (☼). (c) The signed fire safety plan shall be forwarded to the District Office of Labour Canada for review and acceptance prior to implementation".

☼ "Senior Officer according to Treasury Board Standard 3-1, Section 1.5 means the highest ranking official of any department or agency occupying space in a building or facility and being responsible for the preparation and administration of the fire safety plan. The person so identified is to be located in that building."

For the 2005 Internal Audit, the audit team developed a Fire Emergency Evacuation Plan Checklist that was reviewed and accepted by Corporate Services, Policy and Communications Branch, Real Property Branch, Treasury Board Secretariat Real Property and Materiel Policy and Safety Directorate, and Treasury Board Secretariat Health & Employee Services Directorate. At the request of Treasury Board Secretariat, the examination was enhanced to include Section 2.3 of Treasury Board's Standard 3-1, even though this is not a requirement in PWGSC's Departmental Policy 078. This same checklist was used for the 2007 Follow-up Audit.

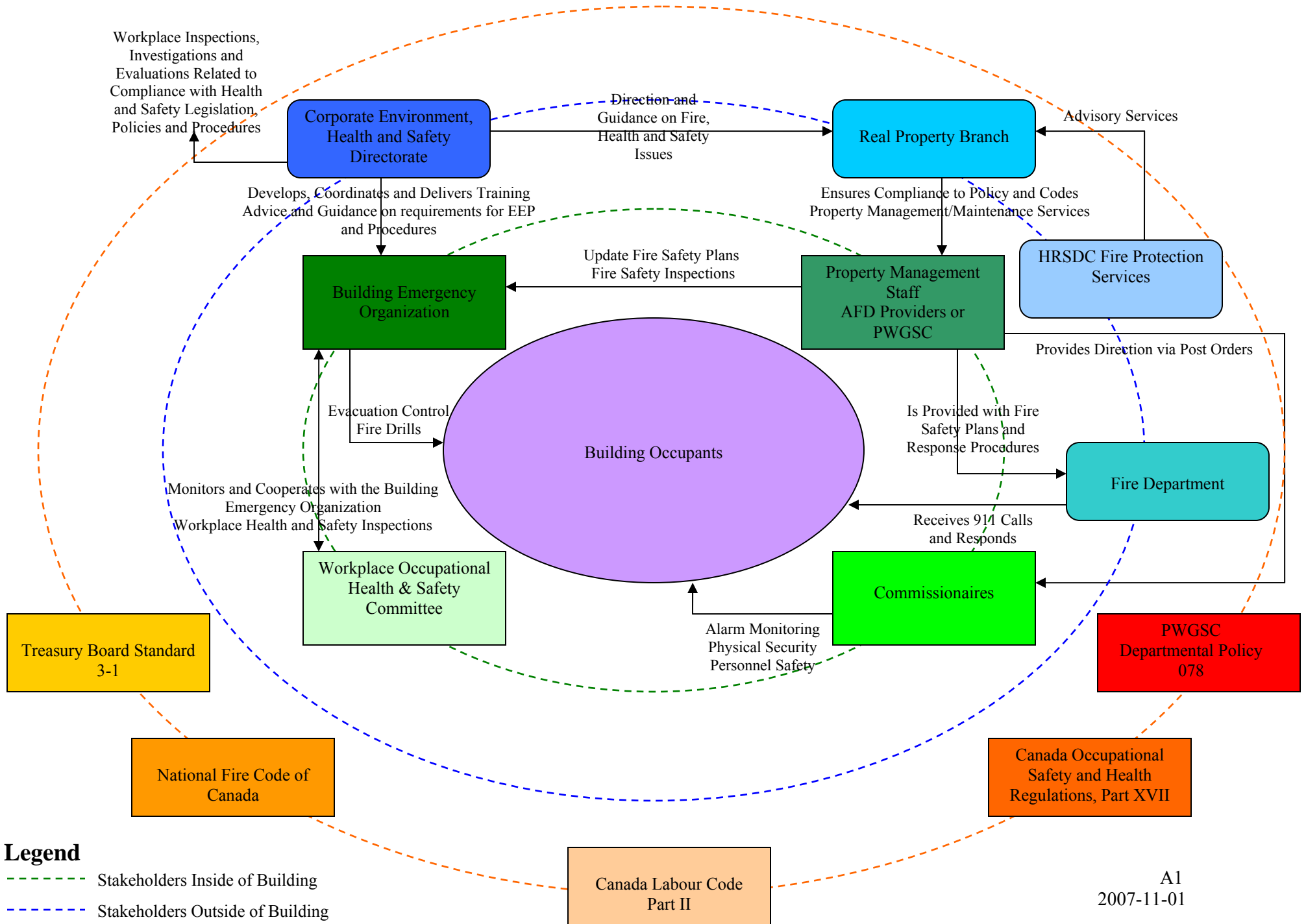
Audit Work Completed

Audit fieldwork for this follow-up audit was substantially completed on August 13, 2007.

Audit Team

The audit was conducted by members of the Audit and Evaluation Branch under the overall direction of the Chief Audit Executive, Audit and Evaluation Branch.

Appendix 1: Workplace Emergency Evacuation Plans Key Stakeholders and Operating Environment



- Legend**
- - - Stakeholders Inside of Building
 - - - Stakeholders Outside of Building
 - - - Regulatory Environment