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Report of the  
**Auditor General  
of Canada**  
to the House of Commons

SPRING

**Chapter 3**  
Health and Safety in Federal Office Buildings



Office of the Auditor General of Canada

*The Spring 2009 Report of the Auditor General of Canada comprises a Message from the Auditor General of Canada and seven chapters. The main table of contents for the Report is found at the end of this publication.*

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Chapter

# 3

Health and Safety in Federal Office  
Buildings



# Table of Contents

<b>Main Points</b>	<b>1</b>
<b>Introduction</b>	<b>5</b>
Roles and responsibilities for health and safety	5
Building operation and maintenance	5
Fire safety planning	8
Fire safety administration and enforcement	8
Focus of the audit	9
<b>Observations and Recommendations</b>	<b>10</b>
<b>Building operation and maintenance</b>	<b>10</b>
The policy framework for managing federal real property is clear	10
Public Works and Government Services Canada’s policies are clear	11
Annual building management plans may not include all high-priority deficiencies	11
Not all identified high-priority deficiencies are corrected on a timely basis	14
PWGSC could not consistently demonstrate that it properly maintains fire safety equipment	16
PWGSC does not consistently follow its own policies for leased buildings	17
<b>Fire safety planning and fire emergency organization</b>	<b>18</b>
Roles and responsibilities for fire safety planning are not well understood	18
Fire safety plans do not meet review and acceptance requirements	21
Not all required fire evacuation drills are taking place	24
Fire emergency organizations are not meeting to discuss their roles and responsibilities	25
<b>Fire safety administration and enforcement</b>	<b>26</b>
Human Resources and Skills Development Canada does not fully administer and enforce the Treasury Board Standard	26
<b>Conclusion</b>	<b>29</b>
<b>Responses to Recommendations</b>	<b>31</b>
<b>About the Audit</b>	<b>48</b>





# Health and Safety in Federal Office Buildings

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## Main Points

### What we examined

Responsibility for ensuring the health and safety of federal employees working in a federally administered office building is shared among many parties. Public Works and Government Services Canada (PWGSC) is responsible for ensuring that federally occupied buildings, their operating systems, and equipment remain safe in accordance with applicable laws and regulations. Human Resources and Skills Development Canada (HRSDC), through its Labour Program, is responsible for administering and enforcing fire protection policy and standards in federally occupied buildings. In addition, individual departments have a responsibility for the health and safety of their employees working in those buildings.

We examined whether PWGSC manages the operation and maintenance of buildings under its administration in a way that effectively minimizes risks to the health and safety of building occupants.

We also assessed whether departments were planning for fire emergencies in compliance with key requirements of the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (the Standard), including conducting required fire drills. In addition, we looked at the activities of Fire Protection Services (formerly called the Fire Commissioner of Canada), the division within HRSDC's Labour Program responsible for administering and enforcing this Standard. We also looked at the role of the Labour Program's regional and district offices in reviewing fire safety plans for buildings occupied by the federal government.

We looked at buildings administered by PWGSC to see whether the departments had adhered to the applicable policies and standards. Our audit focused on general-purpose office buildings administered by PWGSC and did not consider special-purpose buildings, the Parliamentary Precinct, or buildings administered by other government departments or agencies. We did not look at occupational health and safety programs of government departments. Our audit was not designed to assess the health and safety of a building, but rather to

examine the practices departments have in place to manage and mitigate risks to the health and safety of building occupants.

### Why it's important

The federal government employs about 230,000 people in all regions of Canada who work in more than 1,400 buildings administered by PWGSC. In an organization of such magnitude, with high-rise buildings accommodating often thousands of workers, it is important that all established policies and standards are consistently adhered to. An overall culture of safety, promoted by management and including good building evacuation plans, fire evacuation drills, and properly maintained facilities, could greatly reduce the risks to the health and safety of employees. A sound framework for the maintenance and operation of buildings is critical to the health and safety of federal employees.

### What we found

- Although departments are required to hold annual fire evacuation drills in order to train employees and test evacuation procedures, in 33 percent of the 54 buildings we looked at, departments could not demonstrate that they were doing so. Furthermore, the departments occupying almost all of the high buildings we reviewed are not carrying out the additional drills required. Departments do not comply with key requirements of the Standard for Fire Safety Planning and Fire Emergency Organization. For example, fire safety plans for the majority of buildings in our audit have not been submitted to HRSDC's Labour Program—the federal government's technical authority on fire safety—for review and acceptance. In response to concerns we raised during our audit about the lack of reviewed and approved fire safety plans and to letters we sent to departments drawing particular attention to non-compliance with fire drill requirements, departments began to take corrective action in order to address those deficiencies.
- HRSDC's Labour Program does not fully administer and enforce the Standard for Fire Safety Planning and Fire Emergency Organization. There is no government-wide monitoring of participation in fire evacuation drills. In addition, the Labour Program does not have adequate management systems in place to ensure that it reviews fire safety plans for all government buildings to determine whether they are adequate to evacuate employees in an emergency. The Labour Program had reviewed the plans for only 19 of the 54 buildings included in our audit (35 percent) and only 10 of these plans met the requirements of the Standard and were accepted.

- PWGSC has established clear internal policies and guidance for managing the condition and operation of office buildings under its administration. However, the Department could not demonstrate that established practices were followed consistently. We noted, for example, that in leased properties, PWGSC staff were not carrying out required building performance reviews in accordance with the Department's guidance.
- While PWGSC has a list of repairs and maintenance projects that it has identified to correct high-priority deficiencies, including those related to health and safety, it cannot demonstrate that the list is complete and accurate. Of the 280 projects on the list related to the 23 Crown-owned buildings we examined, 59 percent had been completed or substantially completed within the time frame required. Of the remaining projects, the Department deferred 12 percent and cancelled 4 percent; it was unable to provide sufficient documentation to demonstrate that another 4 percent had been completed or substantially completed. In addition, the Department has told us that, after further investigation during our audit, the remaining 21 percent of projects had been misclassified as high priority or included in the Building Management Plan in error. As a result, PWGSC cannot demonstrate that it is meeting its policy requirements to correct all high-priority deficiencies within the next fiscal year.

**The departments and agencies have responded.** All departments and agencies agree with our recommendations and have committed to implementing corrective action. In some cases, this action has already begun. Detailed responses can be found in the **Responses to Recommendations** section, starting on page 31.



## Introduction

### Roles and responsibilities for health and safety

**3.1** Many parties share the responsibility for ensuring the health and safety of federal employees working in a federally administered office building. Operating and maintaining the buildings, their systems and equipment, and planning for fire safety and fire emergencies within the buildings are two critical government activities intended to reduce the risks to the health and safety of federal employees.

**3.2** As an employer, each federal department or agency is responsible for the health and safety of its employees. Exhibit 3.1 summarizes the allocation within the Government of Canada of the primary roles and responsibilities for building operation and maintenance, and for fire safety, in federal office buildings.

### Building operation and maintenance

**3.3** As the designated federal custodian for general-purpose office facilities, Public Works and Government Services Canada (PWGSC) is responsible for ensuring a safe and healthy working environment for the tenants of its federal buildings. In addition, individual departments have a responsibility for the health and safety of their employees working in these buildings. PWGSC fulfills its responsibilities by ensuring that office buildings and their major systems and related equipment are properly operated and maintained. The condition of these buildings bears directly on the health and safety of the more than 230,000 federal employees who work in them. Proper management of a building's condition and operation reduces risks to the health and safety of its occupants.

**3.4** As of 31 January 2008, PWGSC, through its Real Property Branch, administered more than 1,400 office buildings. The Crown owned approximately 20 percent of them, and leased the remaining 80 percent. In Crown-owned office buildings, PWGSC fulfills its responsibility to ensure a safe and healthy working environment by operating and maintaining buildings in adherence with applicable health and safety authorities and standards. In the case of many Crown-owned buildings, the Department discharges its responsibilities through contractual arrangements with third-party service providers. In leased buildings, the Department monitors building performance and ensures that landlords operate and maintain the buildings in

**Exhibit 3.1 Shared responsibilities for building operation and maintenance and for fire safety**

Entity	Roles and Responsibilities
<b>Public Works and Government Services Canada (PWGSC)</b>	Provides office and common use accommodations for federal departments and agencies.  Ensures, as the federal custodian for general-purpose office facilities, that buildings, their systems, and equipment adhere to applicable laws, regulations, policies, and standards, including those concerning health and safety.
<b>Property Manager</b>	Ensures that buildings under the custody of PWGSC are operated properly and maintained so they provide a safe and healthy work facility.
<b>Employer (Government Entities)</b>	Complies with prescribed policy and standards for fire safety, including the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization, the <i>Canada Labour Code</i> , Part II, and the <i>Canada Occupational Health and Safety Regulations</i> , Part XVII.
<b>Major Occupying Department</b>	As the department with the largest number of employees in a building, prepares and administers the building's fire safety plan, and establishes and administers the building's fire emergency organization, on behalf of all federal entities in the building.
<b>Other Occupying Departments</b>	Cooperate in creating and implementing the building's fire safety plan and the fire emergency organization (including providing necessary fire wardens).
<b>Human Resources and Skills Development Canada (HRSDC) (Fire Protection Services)</b>	Administers and enforces the Treasury Board Policy on Fire Protection, Investigation and Reporting and its related standards.  Advises Treasury Board and government entities on fire protection policies (among various other fire protection services).
<b>HRSDC (Labour Program Regional and District Offices)</b>	Reviews and accepts fire safety plans departments provide under the requirements of the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization.
<b>Treasury Board of Canada Secretariat</b>	Provides strategic direction, leadership, advice, and assistance on issues related to the management of real property and fire safety planning.  Develops and updates relevant policies and standards for the management of real property and for fire safety planning.  Provides policy guidance and interpretation to departments on how to implement relevant policies and standards.  Monitors how relevant policies are implemented and whether policy objectives are achieved.

Sources: Treasury Board Policy Suite for the Management of Assets and Acquired Services; Treasury Board Policy on Fire Protection, Investigation and Reporting; Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization.

accordance with lease agreements that require adherence to these same authorities and standards.

**3.5** PWGSC's budget for operating and maintaining the portfolio of assets its Real Property Branch manages is \$1.9 billion for the 2008–09 fiscal year (\$2.3 billion in the 2007–08 fiscal year).

**3.6** Both the Treasury Board Policy on the Management of Real Property and the Common Services Policy clearly identify PWGSC as the department responsible for the administration of federal office facilities. To carry out its work, the Department developed a Facility Maintenance Policy and an Asset Performance Monitoring Policy. These policies serve as the basis for the Department's operation and maintenance practices related to office buildings.

**3.7** PWGSC gathers information from many sources to help manage health and safety risks due to building condition, operation, and maintenance. Included in these sources is a series of reports that are used to provide up-to-date information on, among other things, a building's compliance with health and safety requirements:

- Building Condition Report,
- Building Performance Review, and
- Building Management Plan.

**3.8 The Building Condition Report.** PWGSC is required to prepare a Building Condition Report for Crown-owned buildings every five years, in accordance with departmental guidance. A report is not required for leased buildings. The report contains descriptions and assessments of the physical condition of each building component, as well as any recommended repairs or work projects. The Department uses building condition reports to develop its annual work plan.

**3.9 The Building Performance Review.** PWGSC is required to prepare a Building Performance Review every year for all Crown-owned buildings and once every two years for all leased buildings, in accordance with departmental guidance. The review focuses on the operating performance of building components, as opposed to their condition. The Department uses information from the review to develop the Building Management Plan.

**3.10 The Building Management Plan.** PWGSC develops a financial and operational work plan, known as the Building Management Plan, for each building. The Department prepares the plan annually for Crown-owned buildings, based on information from the Building Condition Report, the Building Performance Review, maintenance

records, and various other sources. The plan lists all scheduled projects, including building health and safety projects, for the planning year and beyond. The Department also develops a Building Management Plan for leased buildings every two years, which focuses on the funding needed for leased buildings for the coming years.

### Fire safety planning

**3.11** The *Canada Labour Code*, Part II, and the *Canada Occupational Health and Safety Regulations*, Part XVII, require that employers provide safety measures, including an emergency evacuation plan, for emergency situations in which employees might need to evacuate a workplace. Departments or agencies that occupy space in a building are therefore responsible for ensuring that their employees can safely evacuate a building in the event of a fire or other emergency.

**3.12** The Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (the Standard) guides departments and agencies on planning and organizing for fire emergencies. It requires that all departments occupying the same building work together to ensure that the required fire emergency measures are established and implemented.

**3.13** The **senior officer** of the **major occupying department** in each building has critical responsibilities under the Standard, including

- preparing and administering the building fire safety plan; and
- establishing and administering the building Fire Emergency Organization, on behalf of all federal entities in the building.

**3.14** National Defence is not subject to the Standard, but is required to adhere to the provisions of the *Canada Labour Code*, Part II, and the *Canada Occupational Health and Safety Regulations*, Part XVII. National Defence's fire protection services are provided by the Canadian Forces Fire Marshall, who has the authority to issue orders, directives, and instructions to implement the Department's fire protection services policies.

### Fire safety administration and enforcement

**3.15** Human Resources and Skills Development Canada's (HRSDC's) Labour Program, through its Fire Protection Services Division and through its regional and district offices, is responsible for administering and enforcing fire protection policy and standards for all real or personal property under the administration and control of federal government departments and agencies, other than National Defence.

**Senior officer**—the highest-ranking official of the major occupying department or agency in a building.

**Major occupying department**—the federal department or agency with the greatest number of employees within a building.

**3.16** The Fire Protection Services Division (formerly called the Fire Commissioner of Canada) is the federal government's technical authority on fire safety. It provides advice and direction to departments and agencies to assist them in complying with the fire safety requirements of various policies and laws, including the *Canada Labour Code*, Part II, the *Canada Occupational Health and Safety Regulations*, Part XVII, the *National Fire Code of Canada*, the fire protection requirements of the *National Building Code of Canada*, and the requirements of the Treasury Board Policy on Fire Protection, Investigation and Reporting and its related standards.

**3.17** The Labour Program's regional and district offices review and accept fire safety plans from federal departments or agencies, to make sure that the plans comply with the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization. They also provide technical advice on the development and content of fire safety plans.

#### **Focus of the audit**

**3.18** Our audit focused on two major activities of the federal government that exist to reduce the risks to the health and safety of federal employees working in office buildings administered by Public Works and Government Services Canada:

- the operation and maintenance of the buildings, their systems, and equipment; and
- the planning for fire safety and fire emergencies within these buildings.

**3.19** We looked at the systems and procedures related to operating and maintaining office buildings (both Crown-owned and leased) that PWGSC has put in place to reduce the risks to the health and safety of building occupants. We then looked at a sample of buildings to test whether the Department was adhering to key elements of these procedures.

**3.20** We examined documentation provided by each of the major occupying departments in the sampled buildings, to determine whether they could demonstrate compliance with critical requirements of the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization.

**3.21** Finally, we looked at the roles, responsibilities, and procedures of Fire Protection Services (a division within Human Resources and Skills Development Canada's Labour Program), which is charged with administering and enforcing the Treasury Board Standard for Fire

Safety Planning and Fire Emergency Organization. We also examined the systems and practices the Labour Program's regional and district offices had established to review and accept fire safety plans.

**3.22** Our audit was not designed to assess the health and safety of a building but rather to examine the processes departments have in place to manage and mitigate risks to the health and safety of building occupants.

**3.23** More details about the audit objectives, scope, approach, and criteria are in **About the Audit** at the end of this chapter.

## Observations and Recommendations

Detailed responses to the recommendations can be found in the **Responses to Recommendations** section, starting on page 31.

### Building operation and maintenance

#### The policy framework for managing federal real property is clear

**3.24** The Treasury Board and the Treasury Board of Canada Secretariat are responsible for establishing a government-wide policy framework for the management and control of federal assets. We expected that the policy framework would establish clear roles, responsibilities, and accountabilities for operating and maintaining federally administered office buildings. We also expected that the policies would establish clear roles, responsibilities, and accountabilities for adhering to applicable health and safety authorities and standards.

**3.25** Both the Treasury Board Policy on Management of Real Property and the Common Services Policy identify Public Works and Government Services Canada (PWGSC) as the designated custodian of general-purpose office facilities. The policy expectations of PWGSC are clearly outlined in these policies and in the Policy Framework for the Management of Assets and Acquired Services. This includes, for example, a requirement that decisions concerning the management of assets and acquired services address critical risks; comply with legislation, regulations, and policies; and rigorously assess the risks to health and safety.

**3.26** We concluded that the policy framework that the Treasury Board established for the management of real property outlines clear accountabilities requiring that PWGSC provide a safe, healthy, and comfortable working environment for clients and tenants of the office buildings it administers. In Crown-owned buildings, the Department is

responsible for operating and maintaining all building systems properly. In leased buildings, PWGSC is responsible for ensuring that the landlord operates the building in accordance with lease covenants, and that tenants are satisfied with the services provided. Lease covenants require the building owner to adhere to all applicable health and safety requirements.

### **Public Works and Government Services Canada's policies are clear**

**3.27** A clearly established policy framework provides high-level direction and guidance to departments. We expected that Public Works and Government Services Canada would have established clear departmental policies and procedures for the day-to-day operation and maintenance of office buildings it administers, and that the guidance would adhere to Treasury Board policy requirements. Specifically, we expected that the departmental policies would include the required level of due diligence with respect to the health and safety of building occupants.

**3.28** We looked at departmental policies designed to ensure that office buildings under PWGSC's administration are properly operated and maintained. These policies include the Asset Performance Monitoring Policy, as well as the Facility Maintenance Policy and accompanying guidelines.

**3.29** We found that these policies are clear and provide appropriate guidance to staff. The policies provide the basis for operation and maintenance practices related to office buildings under PWGSC's administration. For example, the Facility Maintenance Policy requires the Department's Real Property Branch to meet the minimum requirements of all applicable mandated inspections and to provide funding for **mandated maintenance**, without exception. These policies are designed to ensure that the Department maintains all the buildings it administers with due diligence. Effectively managing mandated maintenance will protect the health and safety of building occupants and the investment in the facility.

**Mandated maintenance**—the minimum level of service activities that must be conducted on a routine basis for any federal government facility to comply with health, safety, and environmental standards mandated by applicable laws, codes, and regulations.

### **Annual building management plans may not include all high-priority deficiencies**

**3.30** As part of our audit, we wanted to determine if Public Works and Government Services Canada follows the practices and procedures that it has established. These policies are designed to ensure that buildings are operated and maintained in a manner that minimizes risks to the health and safety of government employees. Regular and systematic monitoring and assessment of building condition and

operation also reduce the risk that buildings and their related systems and equipment are in poor condition or do not function properly.

**3.31** We expected that for Crown-owned office buildings it administers, PWGSC would be able to demonstrate that it regularly and systematically assessed and monitored building condition and operating performance. Such an approach is important in ensuring that the Department identifies necessary repairs as a basis for taking corrective action. These assessments should identify risks to the health and safety of building occupants.

**3.32** We tested whether PWGSC was applying key elements of the process for assessing and monitoring building condition and operating performance, for a sample of 48 office buildings under the Department's administration. In selecting our sample, we chose all buildings (eight) that provided office accommodation to 3,000 or more federal employees. In addition, we chose a random sample of 40 buildings from the 110 buildings that accommodated between 500 and 3,000 federal employees. Of the office buildings included in our sample, the Crown owned (or had the option to purchase at the end of its lease) 23. The Department manages the condition and operating performance of the buildings it may purchase as if they were already owned by the Crown. The Crown leased the other 25.

**3.33** We found that the main tools the Department used to assess the condition and operating performance of a building—the Building Condition Report, the Building Performance Review, and the Building Management Plan—are being completed as required in the majority of cases.

**3.34 Building Condition Report.** PWGSC uses the Building Condition Report to assess the condition of a building. Departmental guidance requires that it be completed at least once every five years, unless the building is undergoing major renovations or is to be sold. In such circumstances, the Department may delay completion of a report, or in the case of buildings scheduled for disposal, a report is not required. Of the 23 Crown-owned office buildings in our sample, three were undergoing major renovations during the period covered by our audit and one was scheduled for disposal. No reports were prepared for those four buildings.

**3.35** We found that a report had been completed in 16 (84 percent) of the remaining 19 Crown-owned buildings within the last five years, as the Department's guidance requires. The Department had completed

building condition reports for the remaining three buildings, but not within the required time frame.

**3.36 Building Performance Review.** PWGSC uses the Building Performance Review to assess the operating performance of a building. Departmental guidance requires that it be completed annually. We found that a review was completed annually during the two-year period under audit for 20 of the 23 Crown-owned buildings (87 percent) in our sample. In the remaining 3 buildings (13 percent), a review was completed for only one of the two years.

**3.37 Building Management Plan.** The Department carries out building condition and operating performance reviews to assess a building's compliance with, among other things, health and safety requirements, and to determine appropriate action when required. The Department identifies and prioritizes deficiencies in the building that require repairs or upgrades. These priorities form the basis from which the Department develops the annual Building Management Plan that lists, at the time it is prepared, the schedule of projects the Department will conduct in the building during the next fiscal year. Deficiencies that constitute a regulatory violation, or that, if not corrected within the year, will pose a risk to health, safety, or the environment, are classified as high priority in the plan.

**3.38** These high-priority deficiencies differ from emergency deficiencies that may occur during a fiscal year. Emergency deficiencies require immediate action and are by their nature not incorporated in the Building Management Plan.

**3.39** As part of our audit, we reviewed the steps PWGSC took to prepare the annual Building Management Plan. We wanted to determine if health and safety deficiencies identified in the Building Condition Report or Building Performance Review were included in the Building Management Plan. We expected that a plan would contain a comprehensive list of projects to correct identified health and safety deficiencies.

**3.40** We noted a number of weaknesses in the processes PWGSC used to incorporate health and safety deficiencies into projects in the annual Building Management Plan. We are concerned that as a result of these weaknesses, the list of required repairs and upgrades related to identified health and safety deficiencies may not be accurate and complete.

**3.41** In particular, we noted that the method the Department uses to prioritize deficiencies in building condition reports and building

performance reviews is not the same as the method the Department uses to develop its building management plans. As a result, there is no clear link between the deficiencies PWGSC identifies through the reports and the reviews and those work items listed in the plans. Without a clear link, it is difficult to ensure that all deficiencies, including those related to health and safety, have been scheduled for remedy in the annual building management plans. We also noted that PWGSC cannot demonstrate that it has an appropriate review and approval process in place to ensure that high-priority projects, including those related to health and safety, are consistently identified, challenged, and prioritized in the building management plans.

**3.42** As a result of these weaknesses, we are unable to conclude whether all identified health and safety deficiencies have been scheduled for remedy in the annual building management plans.

**3.43 Recommendation.** Public Works and Government Services Canada should ensure that all high-priority deficiencies, including those related to health and safety, identified by its reviews and assessments of building condition and operating performance are included in its annual Building Management Plans.

**The Department's response.** The Department has responded and agrees with the recommendation. The Department's detailed response to recommendation 3.43 can be found in the **Responses to Recommendations** section, starting on page 31.

#### **Not all identified high-priority deficiencies are corrected on a timely basis**

**3.44** Despite the weaknesses noted in the previous section, we wanted to determine whether the high-priority projects identified in the Building Management Plan, including those related to health and safety deficiencies, were completed in a timely manner. We expected that these projects would be completed, or substantially completed, within the next fiscal year.

**3.45** We reviewed the Building Management Plan project listings associated with the 23 Crown-owned buildings in our sample. These listings included 280 projects needed to correct high-priority deficiencies. A high-priority deficiency is one that constitutes a regulatory violation or a risk to health, safety, or the environment if not corrected in the next fiscal year.

**3.46** Of these 280 projects, we found that PWGSC was able to demonstrate that 166 (59 percent) were completed, or substantially completed, within the time frame required. Of the remaining projects,

the Department deferred 33 (12 percent) and cancelled 12 (4 percent) identified as high-priority regulatory violations or health, safety, and environmental projects. The Department was unable to provide sufficient evidence to demonstrate that 10 projects (4 percent) had been completed or substantially completed. In addition, the Department has told us that, after further investigation during our audit, the remaining 59 projects (21 percent) were misclassified as high priority or were included in the Building Management Plan in error. The high number of misclassifications supports our finding that PWGSC's business processes lack the appropriate review and approval to ensure that high-priority projects, including those related to health and safety, are consistently identified, challenged, and prioritized.

**3.47** While the Department has told us that, during the course of a year, other health and safety deficiencies might arise and need to be corrected before those listed in the annual Building Management Plan, PWGSC does not document the rationale for such decisions. An up-to-date and comprehensive listing of high-priority projects, including those related to health and safety, is not maintained throughout the year. As such, the Department cannot demonstrate that it is meeting its policy requirement to correct all high-priority deficiencies within the next fiscal year.

**3.48** Our audit was not designed to assess the health and safety of buildings, but rather to examine the practices and processes PWGSC has in place to manage and mitigate risks to the health and safety of building occupants. We are concerned that PWGSC is not exercising appropriate oversight and control over its practices and processes concerning the identification, prioritization, and correction of high-priority deficiencies, including those related to health and safety, in Crown-owned buildings it administers.

**3.49 Recommendation.** Public Works and Government Services Canada should ensure that it implements mechanisms to consistently identify, challenge, and prioritize high-priority deficiencies, including those related to health and safety, and that it corrects these deficiencies within the time frame it has established.

**The Department's response.** The Department has responded and agrees with the recommendation. The Department's detailed response to recommendation 3.49 can be found in the **Responses to Recommendations** section, starting on page 31.

**PWGSC could not consistently demonstrate that it properly maintains fire safety equipment**

**3.50** PWGSC is responsible for ensuring that Crown-owned buildings under its administration are properly maintained in accordance with applicable health and safety legislation, codes, and regulations. We looked at whether the Department was conducting the mandated maintenance for certain fire safety equipment and systems on a routine basis. Maintenance of fire safety equipment is considered mandatory.

**3.51** We expected that the Department would be able to demonstrate that it performed mandated maintenance for selected fire safety equipment in the 2007–08 fiscal year. We focused on fire safety equipment that has a direct link to the health and safety of building occupants, including

- fire alarm and voice communication systems (if applicable),
- sprinklers,
- emergency exit doors, and
- fire separation doors.

**3.52** For 16 of the 23 Crown-owned buildings we looked at (70 percent), PWGSC was able to demonstrate that it had tested or inspected all selected fire safety equipment, as required, in the 2007–08 fiscal year. For the remaining 7 buildings (30 percent), while there was evidence of some maintenance activities, the Department was unable to demonstrate that it had completed all the required work, because departmental records were either insufficient or missing.

**3.53** The Department was unable to consistently demonstrate that it is discharging its responsibilities for maintaining Crown-owned buildings. Keeping complete records demonstrates due diligence is being exercised in the maintenance of buildings and equipment in a manner that mitigates the risks to the health and safety of building occupants.

**3.54 Recommendation.** Public Works and Government Services Canada should strengthen its systems and practices so that it can consistently demonstrate that it is completing mandated maintenance as required.

**The Department's response.** The Department has responded and agrees with the recommendation. The Department's detailed response to recommendation 3.54 can be found in the **Responses to Recommendations** section, starting on page 31.

**PWGSC does not consistently follow its own policies for leased buildings**

**3.55** PWGSC is required to ensure that the property managers and owners of the leased office buildings it administers operate and maintain the buildings in accordance with the terms and conditions of the leases. These terms and conditions include requirements for the safe and healthy operation and maintenance of the building, its systems, and its equipment.

**3.56** We expected that the Department would have processes in place to monitor whether property owners were complying with lease requirements. We looked at the mechanisms in place in the Department to monitor whether leased buildings were being operated and maintained in accordance with the lease terms and conditions. We noted that departmental guidance requires that a Building Performance Review be carried out every two years in leased facilities. We also noted that the Department's Asset Performance Monitoring Policy requires a similar level of due diligence when assessing the performance of leased facilities as it does for the Crown-owned buildings it administers.

**3.57** We found that the Department is not applying its policy with the same rigour for leased buildings as for Crown-owned buildings. Although PWGSC had conducted a Building Performance Review for all of the 25 leased buildings included in our sample in either the 2006–07 or 2007–08 fiscal year, it did not carry out these reviews in accordance with departmental policy. In 11 of the 25 cases (44 percent), many sections were left blank. In some cases, based on our review of departmental records, little if any assurance was obtained from building owners to support the Building Performance Review. The reviews do not adhere to the Department's own guidance, thus increasing the risk that health and safety issues in leased buildings will not be identified.

**3.58** The Department states that property and facility managers also use a series of reactive processes in order to assess building operating performance in leased facilities. These processes include, to varying degrees,

- participation on tenant committees in buildings,
- review and follow-up of service calls to the National Service Call Centre,
- results of optional tenant satisfaction surveys, and
- informal building inspections.

**3.59** We found that property and facility managers do not use these processes consistently. For leased buildings in our sample, we are unable to determine whether PWGSC is monitoring whether building owners are identifying and addressing health and safety issues in a timely manner. The Department is unable to demonstrate that it is administering leased office space in a manner that minimizes the risks to the health and safety of federal government employees working in these buildings. The practices it uses to oversee leased buildings do not adhere to its own guidance.

**3.60 Recommendation.** Public Works and Government Services Canada should carry out its responsibilities for leased buildings, as required by departmental policies.

**The Department's response.** The Department has responded and agrees with the recommendation. The Department's detailed response to recommendation 3.60 can be found in the **Responses to Recommendations** section, starting on page 31.

## Fire safety planning and fire emergency organization

### Roles and responsibilities for fire safety planning are not well understood

**3.61** To minimize the risks to federal employees in the event of a fire, roles and responsibilities for fire safety planning must be clear and well understood. A lack of understanding and accountability increases the risk that fire safety planning measures will not be carried out. The health and safety of building occupants may be affected.

**3.62** We expected that the roles and responsibilities for fire safety outlined in the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (the Standard) would be clear and well understood. We reviewed the Standard intended to guide departments and agencies on establishing and implementing fire safety measures. We reviewed the fire safety documentation each major occupying department provided relating to the building fire safety plan, fire emergency organization, and fire evacuation drills. We also communicated with officials from the major occupying department for each of the buildings in our sample.

**3.63** We found that not all departments and agencies understood their fire safety planning roles and responsibilities outlined in the Standard. In many cases, the major occupying department did not carry out key requirements of fire safety planning, such as preparing and administering the fire safety plan, because either it was not aware of its responsibilities, or it believed that the building custodian or owner was responsible for these duties.

**3.64** In many Crown-owned buildings, Public Works and Government Services Canada (PWGSC), the building custodian, appeared to have taken on the responsibility for the fire safety plan, with the major occupying department having little or no involvement. We noted that PWGSC has a departmental policy assuming responsibility for establishing an emergency evacuation plan in all Crown-owned properties that it administers. Taking on this responsibility contradicts the requirements of the Standard. In our opinion, this has contributed to the major occupying departments' confusion about roles and responsibilities for the fire safety plan. In February 2009, PWGSC revised its departmental policy. While we did not review it in detail, the new policy appears to be in line with the requirements of the Standard.

**3.65** We also found a lack of awareness among major occupying departments in leased buildings concerning their roles and responsibilities, not only for preparing and administering the fire safety plan but also for developing the building fire emergency organization and maintaining fire drill records. Major occupying departments told us that it was difficult to apply the Standard in buildings where the federal government occupied only a small portion of leased space. We found that in these cases the major occupying department did not take a lead role for fire safety planning. Instead, the building custodian or owner appeared to handle these responsibilities. As some of these departments did not maintain their own fire safety records and could not obtain appropriate records from the building owner, they were unable to demonstrate that annual fire evacuation drills had taken place, as the Standard requires.

**3.66** All federal departments have obligations as building occupants and as employers, as set out in the Standard and the *Canada Labour Code*, Part II. In circumstances where the federal employer department represents a small number of total occupants in a building, we expected that in order to discharge its duties, the department would have obtained a copy of the fire safety plan from the building owner and assured itself of the plan's completeness. We also expected that the department would have ensured that required fire drills and fire emergency organization meetings took place, and that complete records of such events were maintained to demonstrate that the department had discharged its duties as an employer.

**3.67** Departments and agencies need to be aware of their responsibilities for fire safety planning under the Standard, in order to exercise due diligence in ensuring that either they meet those responsibilities or ensure that a third party, such as the building

custodian, meets them. Confusion about roles and responsibilities for fire safety planning can lead to situations where no department takes them on. As a result, the health and safety of building occupants is at risk in the event of an emergency that requires an evacuation. Our case study about 66 Slater Street illustrates the importance of clarifying roles and responsibilities.

#### Case Study—66 Slater Street

##### Confusion in determining the major occupying department resulted in fire safety responsibilities not being discharged

According to Public Works and Government Services Canada's (PWGSC's) database of real property, as at 31 January 2008, the office building located at 66 Slater Street in downtown Ottawa housed approximately 800 federal employees from a number of departments. They included National Defence, the Privy Council Office, and Veterans Affairs Canada.

We expected that the major occupying department in the building would be able to demonstrate that it complied with the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (the Standard) for the period under audit, 1 April 2006 to 31 March 2008.

Both the Privy Council Office and Veterans Affairs Canada told us about discussions held in October 2006 to determine which entity was the major occupying department and thus responsible for the building's fire safety planning. We found disagreement among the departments concerning which of them had the most employees in the building. The Privy Council Office informed us that it had no reasonable grounds to assume, and never considered itself to be, the major occupying department during any portion of the period under audit. Veterans Affairs Canada confirmed to us that at no time did it assume or acknowledge responsibility for fire safety planning in the building. We noted that the Standard does not guide departments on how and when to calculate which entity is the major occupying department in a building, and this may have contributed to the confusion.

During the period under audit, no planned annual fire evacuation drills occurred in the building. A building fire emergency organization was not established and an approved fire safety plan was not in place for the building. The confusion among the departments resulted in no department assuming the fire safety planning responsibilities of the major occupying department. As such, fire safety planning risks were not addressed for the building for almost a three-year period, thereby endangering the health and safety of the federal employees located at 66 Slater Street.

National Defence has confirmed that since February 2008, it is the major occupying department and it has taken responsibility for the fire safety duties in the building. We noted that since taking on the responsibility, National Defence has demonstrated that it is working toward establishing an up-to-date and approved fire safety plan. A full building fire evacuation drill took place in December 2008.

**3.68** The Treasury Board of Canada Secretariat has acknowledged that the language in the Standard may lead to uncertainty or ambiguity about roles and responsibilities. Over the past few years, the Secretariat has been updating the current Standard for Fire Safety

Planning and Fire Emergency Organization and plans to issue a new suite of fire-related policy instruments that should clarify employer, custodian, and tenant responsibilities.

**3.69 Recommendation.** The Treasury Board of Canada Secretariat should complete its updates to the Standard for Fire Safety Planning and Fire Emergency Organization to clarify roles and responsibilities of the building custodian and tenant departments or agencies for fire safety planning.

**The Secretariat's response.** The Secretariat has responded and agrees with the recommendation. The Secretariat's detailed response to recommendation 3.69 can be found in the **Responses to Recommendations** section, starting on page 31.

**3.70 Recommendation.** Public Works and Government Services Canada (PWGSC) should work with other government departments to determine the appropriate clarification to be included in lease agreements to facilitate cooperation between building owners and federal tenants regarding fire safety planning and fire emergency organizations. For facilities under existing lease agreements, PWGSC should work with building owners to ensure that tenant departments are provided the information needed to meet their obligations under the Standard for Fire Safety Planning and Fire Emergency Organization.

**The Department's response.** The Department has responded and agrees with the recommendation. The Department's detailed response to recommendation 3.70 can be found in the **Responses to Recommendations** section, starting on page 31.

### **Fire safety plans do not meet review and acceptance requirements**

**3.71** A fire safety plan that outlines, among other things, the procedures employees should follow in case of an evacuation, is an essential tool to ensure a safe and healthy workplace. In the event of an emergency that requires evacuation or intervention by rescuers, a complete and accurate fire safety plan is essential to ensure the safe and timely evacuation of a building. The *Canada Labour Code*, Part II, and the *Canada Occupational Health and Safety Regulations*, Part XVII, also require employers to prepare an emergency evacuation plan.

**3.72** According to the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization, the senior officer shall prepare a fire safety plan for all **Government of Canada properties**. In buildings occupied by a number of departments, the senior officer of

**Government of Canada property**—Real or personal property under the administration and control of a federal government department or agency, including property leased to the government.

the major occupying department is responsible for preparing and administering the fire safety plan.

**3.73** As part of our audit, we reviewed the fire safety plans for each of the buildings included in our sample to ensure that the plans were prepared and reviewed according to the Standard. In 3 of the buildings we looked at, each consisting of 3 office towers, each tower is treated separately for fire safety planning. As a result, the 48 buildings included in our audit were treated as 54 buildings when determining compliance with the Standard's requirements. We found that a plan existed for 53 of the 54 buildings in our audit. No fire safety plan existed for the remaining building.

**3.74** In order to ensure the completeness and accuracy of fire safety plans, the Standard requires that

- the senior officer of the major occupying department review and approve the plan,
- the plan be prepared in cooperation with the local fire department, and
- the plan be submitted to a regional or district office of Human Resources and Skills Development Canada's Labour Program for review and acceptance.

**3.75** National Defence is the only occupant in two of the buildings we examined. Although National Defence is not subject to these requirements, it is required by the *Canada Labour Code*, Part II, and the *Canada Occupational Health and Safety Regulations*, Part XVII, to prepare an emergency evacuation plan.

**3.76** We noted that for 42 of 54 buildings included in our audit (78 percent), no evidence was provided that the senior officer had reviewed and approved the fire safety plan by the end of the period under audit. In 10 of the 54 buildings (19 percent), evidence was provided that the senior officer reviewed and approved the plan. The remaining 2 buildings are fully occupied by National Defence, which is not subject to this requirement. We also noted that 8 fire safety plans were subsequently reviewed and approved by the senior officer during the course of our audit.

**3.77** We found that for 35 of 54 buildings (65 percent), no fire safety plan had been submitted by the end of the period under audit to the Labour Program for its review and acceptance that the content of the plan was in accordance with the Standard. In 17 of the 54 buildings (31 percent), evidence was provided that the fire safety plan was sent

to the Labour Program. National Defence, which is not subject to this requirement, stated that its Chief Fire Inspector had reviewed the fire safety plans for the 2 buildings it fully occupies. However, National Defence was unable to demonstrate that this review occurred. In addition, we noted that 8 fire safety plans were submitted to the Labour Program during the course of our audit.

**3.78** The Standard requires cooperation with the local fire department. The purpose of this is to ensure that the fire safety plan includes the necessary information used by the fire department in the event of a fire emergency. We found that in 17 out of 54 cases (31 percent), there was no evidence that the fire safety plan had been prepared in cooperation with the local fire department by the end of the period under audit. In 35 of the 54 buildings (65 percent), evidence was provided to demonstrate that the fire safety plan was prepared in cooperation with the local fire department. Although National Defence is not subject to this requirement, it stated that the local fire department had approved the fire safety plan template used in the 2 buildings it fully occupies, but it was unable to provide evidence of this approval. In addition, we noted that 3 fire safety plans were prepared in cooperation with the local fire department during the course of our audit.

**3.79** In the majority of cases, the senior officers of the major occupying departments have not complied with the requirements for review and acceptance of fire safety plans. As such, they have not exercised the necessary duty of care in discharging their responsibilities under the Standard. In the absence of obtaining the necessary reviews and approvals, the fire safety plans may not be accurate or complete.

**3.80 Recommendation.** Departments should ensure that fire safety plans are prepared and administered in accordance with established federal legislation and Treasury Board policies and standards.

**The departments' response.** All entities identified as a major occupying department in our audit agreed with the recommendation and agreed to ensure that fire safety plans are prepared and administered in accordance with established federal legislation and Treasury Board policies and standards. See individual entity responses to recommendation 3.80 in the **Responses to Recommendations** section, starting on page 31.

**Not all required fire evacuation drills are taking place**

**3.81** Regular fire evacuation drills are a critical aspect of fire safety planning. A fire evacuation drill trains building occupants about the procedures they should follow in an emergency and tests the adequacy of the fire safety plan.

**3.82** The Standard for Fire Safety Planning and Fire Emergency Organization (the Standard) requires departments to conduct at least one fire evacuation drill each year, involving all occupants in all federally occupied areas of buildings. The *Canada Labour Code*, Part II, and the *Canada Occupational Health and Safety Regulations*, Part XVII, also require employers to hold at least one evacuation drill every year for its employees in the building.

**3.83** To determine whether the necessary fire evacuation drills were taking place, we examined the fire evacuation drill records the major occupying department provided for each of the buildings included in our audit. We expected that the major occupying department would be able to demonstrate that the required fire evacuation drills had taken place, and that it maintained records of such fire evacuation drills, as the Standard prescribes.

**3.84** We found that, in 18 of the 54 buildings (33 percent), the major occupying department could not demonstrate that a fire evacuation drill involving all occupants took place each year during the period 1 April 2006 to 31 March 2008. In 9 of these buildings, a fire evacuation drill did not take place each year. In the remaining 9 cases, the major occupying department told us that a fire evacuation drill occurred; however, it could not provide sufficient records to demonstrate that such a drill took place each year as the Standard requires. We noted that during our audit, 15 of these 18 buildings provided sufficient records to demonstrate that a fire evacuation drill took place after 31 March 2008.

**3.85** The Standard also requires additional drills for large buildings with higher occupancy. These buildings, called high buildings, are defined in the *National Building Code of Canada*. There were 31 high buildings among the 54 buildings we examined. National Defence, which is not subject to this requirement, fully occupies one of these buildings. We found that, in the remaining 30 high buildings, the additional required drills were not taking place.

**3.86** Due to the serious nature of our findings in this area, we sent letters to the Deputy Minister of the major occupying department in each of the buildings that could not demonstrate that an annual fire

evacuation drill had occurred in the period under audit and had not carried out a drill during the course of our audit. We also sent letters for each of the high buildings owned by the Crown or in which the federal government occupied the majority of leased space, and in which the additional high-building drills were not taking place. The letters concerned 26 of the 31 high buildings. All entities have responded, acknowledging the importance of the situation, and outlining actions already taken or planned in the near future to correct the deficiencies found. The major occupying department in three of the high buildings told us that it was unable to perform some of the additional high-building drills due to the limited capabilities of the building's **single-stage fire alarm system**.

**Single-stage fire alarm system**—a system that transmits an alarm signal throughout the building to warn the building occupants that a fire emergency exists and that all occupants should evacuate the building. A single-stage system does not have the capability of transmitting the alarm signal only to selected floors or zones within a building as does a two-stage alarm.

**3.87** Failure to conduct the required evacuation drills increases the risk that occupants will not be able to evacuate the building safely in an emergency. This failure is putting employees' safety at risk.

**3.88 Recommendation.** Departments should ensure that all evacuation drills are held as required by federal legislation and Treasury Board policies and standards.

**The departments' response.** All entities identified as a major occupying department in our audit agreed with the recommendation and agreed to ensure that all evacuation drills are held as required by federal legislation and Treasury Board policies and standards. See individual entity responses to recommendation 3.88 in the **Responses to Recommendations** section, starting on page 31.

### **Fire emergency organizations are not meeting to discuss their roles and responsibilities**

**3.89** The Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization requires that a fire emergency organization be established and administered by the senior officer in each building. The *Canada Labour Code*, Part II, and the *Canada Occupational Health and Safety Regulations*, Part XVII, also require the establishment of such an organization to plan for emergencies, including fire. A fire emergency organization comprises volunteer members located in the building and is responsible for fire safety planning activities.

**3.90** We looked at documentation provided by the major occupying department related to these fire emergency organizations in the buildings included in our audit. We expected that an organization would exist and that there would be evidence that annual meetings took place to discuss the members' roles and responsibilities under the fire safety plan, as the Standard requires.

**3.91** We found that a fire emergency organization existed in 51 of the 54 buildings we examined (94 percent). In 3 buildings, the major occupying department could not provide sufficient evidence that such an organization existed. In only 10 of 54 buildings (19 percent), evidence of an annual meeting including all members of the organization was provided. In the remaining buildings, many major occupying departments told us that an annual meeting took place; however, they could not provide sufficient records to demonstrate that such meetings took place, as the Standard requires.

**3.92** Ensuring that all members of the fire emergency organization clearly understand their roles and responsibilities in the event of an emergency is critical. A well-informed fire emergency organization is better prepared to ensure the safe and timely evacuation of building occupants. Maintaining complete records of meetings provides evidence of due diligence exercised on the part of the senior officer and the fire emergency organization.

**3.93 Recommendation.** Departments should ensure that building fire emergency organizations are established and administered as required by federal legislation and Treasury Board policies and standards.

**The departments' response.** All entities identified as a major occupying department in our audit agreed with the recommendation and agreed to ensure that building fire emergency organizations are established and administered as required by federal legislation and Treasury Board policies and standards. See individual entity responses to recommendation 3.93 in the **Responses to Recommendations** section, starting on page 31.

## Fire safety administration and enforcement

### Human Resources and Skills Development Canada does not fully administer and enforce the Treasury Board Standard

**3.94** Human Resources and Skills Development Canada's (HRSDC's) Labour Program plays a key role in fire safety administration and enforcement. The Treasury Board of Canada Secretariat has delegated responsibility for administering and enforcing the Standard for Fire Safety Planning and Fire Emergency Organization (the Standard) to Fire Protection Services, a division within the Labour Program. The Labour Program's regional and district offices are responsible for reviewing and accepting building fire safety plans to make sure they comply with the Standard.

**3.95** We expected that Fire Protection Services would have systems and practices in place that would allow it to determine, government-

wide, whether departments and agencies were carrying out their obligations under the Standard. We also expected that the regional and district offices would have systems and practices in place to review and accept the fire safety plans.

**3.96** We reviewed the practices and procedures that Fire Protection Services and the regional and district offices established to discharge their obligations under the Standard. We also examined the files related to the 54 buildings included in our audit, to determine whether the regional and district offices had reviewed and accepted the fire safety plans for these buildings, as the Standard requires.

**3.97** We found that Fire Protection Services, which is tasked with administering and enforcing the Standard, does not directly oversee the regional and district offices that review and accept fire safety plans. In addition, Fire Protection Services does not obtain information from departments on their compliance with the requirements for fire evacuation drills. Accordingly, it is not possible for Fire Protection Services to determine if departments and agencies are meeting the requirements of the Standard.

**3.98** We also found that the regional and district offices inadequately monitor the review and acceptance of fire safety plans. Systems and practices have not been put into place to provide accurate information concerning which buildings satisfy the Standard's requirements. No evidence was provided of a systematic process to track buildings that have or have not submitted plans or to follow up when plans were considered inadequate.

**3.99** Labour Program officials told us that they receive a fire safety plan from a department as a result of a fire inspection conducted by the regional or district offices or when the department submits one. Since 2004, a fire inspection was completed in 32 of the 54 buildings (59 percent) in our audit. We noted that 18 of these inspections contained no observations about the existence of a fire safety plan, while 14 of these inspections resulted in a request that the building fire safety plan be submitted to a regional or district office for review and acceptance. In 7 of these 14 cases, departments and agencies have not yet submitted a fire safety plan. The Labour Program did not seek further compliance with the Standard nor did it escalate the issue, as its own departmental policies require. At the time of our audit, it had been, on average, a year and half since the Labour Program requested submission of these fire safety plans.

**3.100** We noted that the regional and district offices were able to provide evidence that the fire safety plan had been reviewed in only 19 of 54 of the buildings (35 percent) that we examined (15 plans were reviewed by 31 March 2008 and an additional 4 plans were reviewed during the course of our audit). The offices have accepted the fire safety plans for only 10 of these buildings. Deficiencies were identified in the plans of the remaining 9 buildings. The offices provided no evidence of any follow-up with the federal departments or agencies asking them to resubmit deficient fire safety plans, in order to ensure that corrective action had been taken. At the time of our audit, it had been, on average, two years since deficiencies were identified in these plans.

**3.101** In addition to a lack of monitoring and tracking concerning the completeness of fire safety plan reviews, we found little or no evidence that Fire Protection Services enforced the Standard. Labour Program officials told us that the Department seeks voluntary compliance with the Standard. The Department takes a reactive approach concerning the review and acceptance of fire safety plans and there is no oversight of fire evacuation drills. In our view, this is not sufficient to administer and enforce the Standard.

**3.102** HRSDC's Labour Program is not fully discharging its responsibilities under the Standard for Fire Safety Planning and Fire Emergency Organization (the Standard). The Department does not follow up, in a timely manner, in situations of non-compliance, and it does not obtain the information it needs to administer and enforce the Standard. The Labour Program has not reported to the Treasury Board of Canada Secretariat concerning whether departments and agencies are complying with the Standard.

**3.103 Recommendation.** Human Resources and Skills Development Canada should establish the systems and practices it needs to administer and enforce the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization.

**The Department's response.** The Department has responded and agrees with the recommendation. The Department's detailed response to recommendation 3.103 can be found in the **Responses to Recommendations** section, starting on page 31.

**3.104 Recommendation.** The Treasury Board of Canada Secretariat should ensure that the government's policy objectives are being met, by obtaining timely and sufficient information from Human Resources and Skills Development Canada to ensure that it administers and

enforces the Fire Protection, Investigation and Reporting Policy and its related standards.

**The Secretariat's response.** The Secretariat has responded and agrees with the recommendation. The Secretariat's detailed response to recommendation 3.104 can be found in the **Responses to Recommendations** section, starting on page 31.

## Conclusion

**3.105** Our audit noted that Public Works and Government Services Canada (PWGSC) has established clear direction and guidance for conducting inspections of building condition and performance. However, we noted that the Department does not consistently follow these required practices. As a result, PWGSC is not able to consistently demonstrate, for the office buildings it administers, that the Department has effectively managed the risks related to the health and safety of building occupants.

**3.106** PWGSC is not consistently carrying out repairs and upgrades it identified to correct high-priority deficiencies so as to reduce risks to the health and safety of building occupants. Of the 280 projects identified by the Department to correct high-priority deficiencies in the 23 Crown-owned buildings we examined, 59 percent were completed or substantially completed within the time frame required. The Department deferred 12 percent to future years and cancelled 4 percent, despite these projects having been identified by PWGSC as high priority. The Department was unable to provide sufficient documentation to demonstrate that 4 percent of projects had been completed or substantially completed. In addition, the Department told us that, after further investigation during our audit, the remaining 21 percent of projects were misclassified as high priority or were included in the Building Management Plan in error. As a result of the lack of review and approval of these projects, PWGSC cannot demonstrate that it is meeting its policy requirements of correcting all high-priority deficiencies within the next fiscal year.

**3.107** Departments were not able to demonstrate that they are complying with key requirements of the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (the Standard). The majority of fire safety plans for buildings in our audit have not been reviewed and approved, as required. Further, for 33 percent of the 54 buildings included in our audit, departments were unable to demonstrate that they performed fire evacuation drills annually, as the

Standard and federal legislation require. In addition, we noted that in almost all cases we reviewed, departments that occupy high buildings are not carrying out the additional drills required by the Standard. Failure to conduct the required fire drills increases the risk that occupants will not be able to evacuate the building safely in an emergency.

**3.108** We noted that in response to fire safety planning concerns we raised during our audit, and in response to letters we sent to departments drawing particular attention to deficiencies in conducting fire drills, departments began to take corrective action to address the deficiencies related to fire evacuation drills and the review and approval of fire safety plans.

**3.109** Human Resources and Skills Development Canada's Labour Program cannot demonstrate that it administers and enforces the Standard for Fire Safety Planning and Fire Emergency Organization effectively. Specifically, we noted management systems have not been established to ensure that fire safety plans are reviewed and accepted for all federally occupied buildings. The fire safety plans for only 35 percent of buildings included in our audit had been reviewed. We further noted that the Labour Program does not have the information it needs to report to the Treasury Board of Canada Secretariat on government-wide compliance with the Standard.

## Responses to Recommendations

The following is a list of detailed responses to the recommendations found in Chapter 3. The number in front of the recommendation indicates the paragraph where it appears in the chapter. The numbers in parentheses indicate the paragraphs where the topic is discussed.

Recommendation	Response
<b>Building operation and maintenance</b>	
<p><b>3.43</b> Public Works and Government Services Canada should ensure that all high-priority deficiencies, including those related to health and safety, identified by its reviews and assessments of building condition and operating performance are included in its annual Building Management Plans. (3.30–3.42)</p>	<p><b>Public Works and Government Services Canada’s response.</b> Agreed. The Department recognizes that its processes for ensuring inclusion of high-priority deficiencies, including those related to health and safety issues, in its building management plans could be more robust. Improvements to the processes will include a requirement to document the source of identification of high-priority deficiencies added to the annual Building Management Plan, as well as a requirement to document the evidence to support the removal of a high-priority deficiency from the Plan. This will ensure that clear linkages will exist between the building condition and operating performance reviews and the Building Management Plan. These actions will be completed by 31 August 2009.</p>
<p><b>3.49</b> Public Works and Government Services Canada should ensure that it implements mechanisms to consistently identify, challenge, and prioritize high-priority deficiencies, including those related to health and safety, and that it corrects these deficiencies within the time frame it has established. (3.44–3.48)</p>	<p><b>Public Works and Government Services Canada’s response.</b> Agreed. The Department recognizes that it must strengthen its quality assurance process to ensure that projects classified as high priority are consistently identified, challenged, and prioritized. Steps have been taken to provide clarification to operational staff on the classification of high-priority deficiencies, including those related to health and safety issues. Further, a process to ensure a more robust challenge and review of deficiencies classified as high priority will be implemented. This will ensure that high-priority deficiencies are included in the annual building management plans.</p> <p>The Department uses the Building Management Plan as a planning tool. Once finalized, some projects require further investigation to confirm the extent of the deficiency and the time frame for completion. We will introduce a requirement for any changes to projects included in the Building Management Plan as a result of further investigation, to be documented.</p>

Recommendation	Response
<p><b>3.49</b> (continued)</p>	<p>We will also introduce a requirement for the correction of deficiencies to be documented, including any risk mitigation measures taken or projects completed. Finally, action will be taken to monitor the correction of identified deficiencies within the established time frames. This will ensure that we can demonstrate that corrective action has been taken within the established time frames. These actions will be completed by 31 March 2010.</p>
<p><b>3.54</b> Public Works and Government Services Canada should strengthen its systems and practices so that it can consistently demonstrate that it is completing mandated maintenance as required. (3.50–3.53)</p>	<p><b>Public Works and Government Services Canada’s response.</b> Agreed. The Department recognizes that through its record-keeping processes it is not always able to provide sufficient evidence that mandated maintenance has been completed. Processes and procedures to ensure the documentation of the completion of mandated maintenance for Crown-owned and Alternate Form of Delivery managed buildings will be modified accordingly. This will ensure that we can demonstrate that mandated maintenance is being completed as required. These actions will be completed by 31 October 2009, with ongoing monitoring conducted on a semi-annual basis thereafter.</p>
<p><b>3.60</b> Public Works and Government Services Canada should carry out its responsibilities for leased buildings, as required by departmental policies. (3.55–3.59)</p>	<p><b>Public Works and Government Services Canada’s response.</b> Agreed. At the present time, the Asset Performance Monitoring Policy governs the management of both Crown-owned and leased buildings and requires the same approach to be applied for managing these two types of assets. The Department applies the same rigour to the management of leased buildings as to Crown-owned buildings; however, the approach applied is different due to the roles and responsibilities outlined in the contractual agreement between the lessor and the lessee (i.e., the lease agreement). The Department acknowledges that its Asset Performance Monitoring Policy is no longer current and does not reflect the roles and responsibilities outlined in the contractual agreements. The Asset Performance Monitoring Policy will be revised to require an approach to managing leased buildings that reflects current best practices. This will ensure that our approach will be consistent with our Policy. This action will be completed by 31 December 2009.</p>

Recommendation	Response
<b>Fire safety planning and fire emergency organization</b>	
<p><b>3.69</b> The Treasury Board of Canada Secretariat should complete its updates to the Standard for Fire Safety Planning and Fire Emergency Organization to clarify roles and responsibilities of the building custodian and tenant departments or agencies for fire safety planning. (3.61–3.68)</p>	<p><b>Treasury Board of Canada Secretariat’s response.</b> Agreed. The Treasury Board of Canada Secretariat is completing work on the new Standard on Building Emergency Response Organizations, which will clarify roles and responsibilities of the building custodian and tenant departments or agencies for the establishment and implementation of fire emergency organizations. The new Standard will take effect on the same date as the new Treasury Board Occupational Health and Safety Policy, which is expected to come into effect in fall 2009.</p>
<p><b>3.70</b> Public Works and Government Services Canada (PWGSC) should work with other government departments to determine the appropriate clarification to be included in lease agreements to facilitate cooperation between building owners and federal tenants regarding fire safety planning and fire emergency organizations. For facilities under existing lease agreements, PWGSC should work with building owners to ensure that tenant departments are provided the information needed to meet their obligations under the Standard for Fire Safety Planning and Fire Emergency Organization. (3.61–3.68)</p>	<p><b>Public Works and Government Services Canada’s response.</b> Agreed. The Department will work with Justice Canada, the Treasury Board of Canada Secretariat, and the Human Resources and Skills Development Canada Labour Program to determine the appropriateness of amending its leasing documents to include a requirement to facilitate cooperation between building owners and federal tenants regarding fire safety planning and emergency organizations. This collaborative approach will include a possible means to provide clarification for existing leases related to fire emergency planning and fire emergency organization. These actions will be completed by 31 March 2010.</p>
<p><b>3.80</b> Departments should ensure that fire safety plans are prepared and administered in accordance with established federal legislation and Treasury Board policies and standards. (3.71–3.79)</p>	<p><b>Canada Border Services Agency’s response.</b> The Agency agrees with the recommendation. The Agency is reviewing roles and responsibilities to ensure that all fire safety plans are current and conform to policies and standards.</p> <p><b>Canada Revenue Agency’s response.</b> Agreed. The Agency already has safety plans in place and is committed to administering these plans as required by federal legislation and Treasury Board policies and standards.</p>

Recommendation	Response
<p><b>3.80</b> (continued)</p>	<p><b>Canadian Food Inspection Agency’s response.</b> The Agency agrees with this recommendation. In accordance with established federal legislation and Treasury Board policies and standards, the Fire Safety Plan has been reviewed by the Executive Director, Assets and Security Management Directorate, and was submitted to Human Resources and Skills Development Canada in July 2008.</p> <p><b>Canadian Heritage’s response.</b> Agreed. In January 2009, Public Works and Government Services Canada received Human Resources and Skills Development Canada (HRSDC) Labour Program approval of the November 2007 Fire Safety Plan for Les Terrasses de la Chaudière, located at 15 and 25 Eddy, 10 Wellington, and 1 Promenade du Portage.</p> <p>Canadian Heritage is presently making improvements on how files are documented and will finalize all future official departmental documents with appropriate approvals and signatures.</p> <p><b>Canadian Institutes of Health Research’s response.</b> The Canadian Institutes of Health Research agrees with the recommendation and will work with its landlord, within the constraints of the terms of its lease, to ensure that the building’s fire safety plans meet these requirements.</p> <p><b>Canadian Radio-television and Telecommunications Commission’s response.</b> The Commission agrees with the recommendation and has already taken or will take corrective action.</p> <p><b>Citizenship and Immigration Canada’s response.</b> Agreed. The Department’s Fire Plan had been reviewed by the City Fire Chief; however, it was not previously reviewed and approved by the senior officer nor was it submitted to Human Resources and Skills Development Canada (HRSDC) for review and acceptance.</p> <p>The senior officer will review and approve the recent modifications made to the existing Fire Safety Plan, which will include the requirement of additional drills for high-rise buildings.</p> <p>Once approved, the plan will be submitted to HRSDC Labour Program for review and acceptance. The target completion date is 31 March 2009.</p>

Recommendation	Response
<p><b>3.80</b> (continued)</p>	<p><b>Department of Justice Canada’s response.</b> Agreed. Both Justice Canada sites included in this audit now meet this requirement. The senior officer of the Exchange Tower has since reviewed and approved the fire safety plan on 16 October 2008, and the plan was submitted to Human Resources and Skills Development Canada on 22 October 2008 and has been reviewed. Evidence was included in our response to the OAG on 21 January 2009.</p> <p><b>Fisheries and Oceans Canada’s response.</b> The Department agrees with this recommendation.</p> <p>We duly noted the audit results and comments previously provided by the OAG concerning the preparation and administration of fire safety plans and we have taken measures to ensure that we comply with all established legislation, policies, and standards by 31 December 2009.</p> <p><b>Foreign Affairs and International Trade Canada’s response.</b> The Department concurs with the recommended action, and agrees to ensure that the administration of the fire safety plans complies with all federal legislation and Treasury Board policies and standards. A senior officer for 111 Sussex has now been appointed and the existing fire safety plans have been reviewed and approved.</p> <p><b>Human Resources and Skills Development Canada’ response.</b> Agreed. We are in the process of collecting information for all Human Resources and Skills Development Canada buildings and locations across the country that require a fire safety plan under the Treasury Board Standard. The review will be completed by the end of April 2009. As part of that review, an assessment will be completed to ensure that all our buildings are compliant and have fire safety plans in place.</p> <p><b>Immigration and Refugee Board of Canada’s response.</b> Agreed. The Board will ensure that its fire plan is signed and approved by the Regional Director.</p> <p>When the fire plan is modified, the Board will ensure that it is resubmitted properly to Human Resources and Skills Development Canada for review and approval.</p> <p><b>Indian and Northern Affairs Canada’s response.</b> The Department agrees with the recommendation. It will ensure, when preparing and administrating fire safety plans, that they comply with established federal legislation and Treasury Board policies and standards.</p>

Recommendation	Response
<p><b>3.80</b> (continued)</p>	<p><b>Industry Canada’s response.</b> Agreed. The Department assumed responsibility as the major occupying department in Heritage Building on 1 February 2007. Since then, first priority was given to transforming a partially staffed Fire and Emergency Organization into a fully revamped and trained unit. The second priority was to improve the existing fire safety plan by reviewing it and making it compliant with the Treasury Board Standard. The fire safety plans for the C.D. Howe Building and Heritage Building were sent to Human Resources and Skills Development Canada in November 2008 for approval.</p> <p>Once the review process is completed, it will be sent to the senior officer for approval.</p> <p><b>Library and Archives Canada’s response.</b> Agreed. The Fire Safety Plan was approved in September 2008 for this facility and it was deemed to meet Treasury Board policies and standards. The entity will continue to administer it in accordance with those policies and standards.</p> <p><b>National Defence’s response.</b> Agreed. The Chief Fire Inspector for the National Capital Region will ensure that all fire safety plans within the portfolio are reviewed and signed by the Chief Fire Inspector and by the Senior Officer responsible for the particular building by October 2009. Additionally, comments will be sought from the local fire departments.</p> <p><b>Natural Resources Canada’s response.</b> We concur with the recommendation. The Department will prepare and administer fire safety plans in accordance with established federal legislation and Treasury Board policies and standards by March 2010.</p> <p><b>Privy Council Office’s response.</b> Agreed. For buildings where the Privy Council Office (PCO) is the majority tenant, PCO will prepare and administer fire safety plans and share the information with the other tenants.</p> <p>For buildings where PCO is not the majority tenant, PCO will obtain a copy of the fire safety plans established and administered by the majority tenant.</p> <p><b>Public Works and Government Services Canada’s response.</b> Agreed. The Department will ensure that fire safety plans are prepared in all buildings for which it has the largest number of employees by 1 June 2009. The Department has implemented a</p>

Recommendation	Response
<p><b>3.80</b> (continued)</p> <p><b>*Note:</b> Effective February 2009, the Treasury Board of Canada Secretariat (TBS) became the major occupying department in one of the buildings included in our audit. As it has assumed responsibility for taking the required corrective action, TBS has responded to the recommendation instead of the Department of Finance Canada.</p>	<p>national tracking system to monitor compliance with Treasury Board Policy to ensure that remedial action is taken in a timely manner. This will ensure that fire safety plans are prepared and administered in accordance with applicable legislation, policies, and standards.</p> <p><b>Royal Canadian Mounted Police’s response.</b> Agreed. The Royal Canadian Mounted Police concur that the Fire Safety Plan should be created by the senior person in the facility in conjunction with Public Works and Government Services Canada, the building owner, and the fire department. Templates of fire safety plans will be made available by the end of the fiscal year 2009–10 on the Infoweb and provided to divisions to assist in the consistency and format of the fire safety plans. Human Resources and Skills Development Canada will review the fire safety plans.</p> <p><b>Transport Canada’s response.</b> We fully agree with this recommendation. We anticipate having our Fire Safety Plan reviewed for acceptance by Human Resources and Skills Development Canada and signed off by the Deputy Minister by the end of May 2009.</p> <p><b>Treasury Board of Canada Secretariat’s response.*</b> Agreed. The Fire Safety Plan for L’Esplanade Laurier has been revised and submitted to Human Resources and Skills Development Canada for approval.</p> <p><b>Veterans Affairs Canada’s response.</b> Agreed. The Department will undertake a comprehensive review of all sites occupied by the Department nationally to ensure that the requirements for the preparation and administration of fire safety plans in accordance with established federal legislation and Treasury Board policies and standards are met.</p>
<p><b>3.88</b> Departments should ensure that all evacuation drills are held as required by federal legislation and Treasury Board policies and standards. (3.81–3.87)</p>	<p><b>Canada Border Services Agency’s response.</b> The Agency agrees with the recommendation. The Agency will ensure that evacuation drills are held regularly as required by policies and standards.</p> <p><b>Canada Revenue Agency’s response.</b> Agreed. The Agency will conduct evacuation drills as required by federal legislation and Treasury Board policies and standards.</p>

Recommendation	Response
<p><b>3.88</b> (continued)</p>	<p><b>Canadian Heritage’s response.</b> Agreed. In April 2009, the Department will consult the Fire Protection Services at Human Resources and Skills Development Canada (HRSDC) to determine how the Department can meet the requirements of the Standard for additional staged evacuations (two-stage alarm drills) with the existing single-stage fire alarm and voice communication systems.</p> <p>The Department will increase the number of building evacuation drills from one to two per year beginning in 2009 and until such time as consultations with HRSDC take place to identify and implement appropriate procedures and training, or until the fire alarm system is upgraded.</p> <p><b>Canadian Institutes of Health Research’s response.</b> The Canadian Institutes of Health Research agrees with the recommendation and will work with its landlord, within the constraints of the terms of its lease, to ensure that drills are held as required.</p> <p><b>Canadian Radio-television and Telecommunications Commission’s response.</b> The Commission agrees with the recommendation and has already taken or will take corrective action.</p> <p><b>Citizenship and Immigration Canada’s response.</b> Agreed. The Department held annual general evacuation drills; however, it did not hold evacuation drills of adjoining floors for a high-rise building.</p> <p>Additional drills every three months consisting of adjoining floors will be conducted.</p> <p>Target date for the first planned adjoining floor drill is 12 March 2009.</p>

Recommendation	Response
<p><b>3.88</b> (continued)</p>	<p><b>Department of Justice Canada’s response.</b> Agreed. Measures have been taken to correct this shortfall. For the East Memorial Building, the Department demonstrated that a fire drill took place in 2006 but not in 2007. Evidence was provided to the OAG that an annual fire drill was conducted in 2008 and that, as a result of measures now in place and the appointment of a new Chief Building Emergency Officer, the expectation is that the Department will remain compliant in future years.</p> <p>As for the Exchange Tower in Toronto, the federal government occupants’ Chief Fire Emergency Officer will now keep his own records of all fire drills.</p> <p><b>Fisheries and Oceans Canada’s response.</b> The Department agrees with this recommendation.</p> <p>We duly noted the audit results and comments previously provided by the OAG concerning the requirement to hold various types of evacuation drills in accordance with the legislation, policies, and standards, and we have taken measures to ensure full compliance by 30 June 2009.</p> <p><b>Human Resources and Skills Development Canada’s response.</b> Agreed. We are in the process of collecting information for all the Department’s buildings and locations across the country that require evacuation drills under the Treasury Board Standard. The review will be completed by the end of April 2009. As part of that review, an assessment will be completed to ensure that all our buildings are compliant and are conducting regular evacuation drills according to the Standard.</p> <p>Regular quarterly evacuations for Phase IV and Place Vanier have been put in place, beginning in the final quarter of 2008. In the current quarter, an evacuation was undertaken on 11 March 2009 for Phase IV, and in the case of Place Vanier an evacuation drill is scheduled for 31 March 2009.</p> <p><b>Immigration and Refugee Board of Canada’s response.</b> Agreed. Although fire drills have taken place in the past, no log was available to substantiate that fact. The Board now has a log to record fire drills that will be available for verification purposes.</p>

Recommendation	Response
<p><b>3.88</b> (continued)</p>	<p><b>Indian and Northern Affairs Canada’s response.</b> The Department agrees with the recommendation. In order to strengthen building occupants’ familiarity with the Fire and Emergency procedures, we will be conducting two total building evacuation drills per year. Once the new fire alarm system is in place at Les Terrasses de la Chaudière, we will be conducting fire evacuation drills as per the current National Building and Fire codes and as per the Treasury Board Standard and the <i>Canada Labour Code</i>.</p> <p><b>Industry Canada’s response.</b> Agreed. Designated staff drills are conducted in the form of classroom training every two months in the C.D. Howe Building in accordance with the Treasury Board Standard. Supporting documentation is available.</p> <p>Drills every three months for adjoining groups of floors have not been conducted in the C.D. Howe Building since October 2000, when Human Resources and Skills Development Canada (HRSDC) placed the C.D. Howe Building on interim emergency procedures due to the lack of a fully functional voice communication system in the building. The direction provided by HRSDC indicated that the evacuation procedures for fire alarms in the building had to be changed from a phased evacuation to a full evacuation. In order to conduct a phased evacuation, the building voice communication must be fully operational and audible on all floors. This allows instructional fire evacuation for adjoining floors. The C.D. Howe building is currently undergoing a retrofit, during which the renewal of the voice communication system will be completed during fiscal year 2012–13.</p> <p>As for the Heritage Building, the designated staff drills and the drills every three months for adjoining groups of floors will be implemented in March 2009.</p> <p><b>Library and Archives Canada’s response.</b> Agreed. Library and Archives Canada will continue to conduct annual evacuation drills as required by federal legislation and Treasury Board policies and standards. The next evacuation drill is planned for fall 2009.</p>

Recommendation	Response
<p><b>3.88</b> (continued)</p>	<p><b>National Defence’s response.</b> The Chief Fire Inspector for the National Capital Region has taken action to ensure that all fire drills within its jurisdiction take place for fiscal year 2009–10. Further, a process is now in place to ensure continued compliance with these regulations within the National Capital Region.</p> <p><b>Natural Resources Canada’s response.</b> We concur with the recommendation. The Department will hold all evacuation drills, as required by federal legislation and Treasury Board policies and standards, by March 2010.</p> <p><b>Privy Council Office’s response.</b> Agreed. The Privy Council Office will hold, or, through the fire emergency organization, participate in, at least one evacuation drill every year for each building it occupies.</p> <p><b>Public Works and Government Services Canada’s response.</b> Agreed. The Department has created a national, three-year advance schedule for workplace evacuation drills in all 45 workplaces where the Department has the largest number of employees.</p> <p>In its role as employer, the Department has initiated a survey of all other workplaces where it is not the major occupying department, but has employees occupying space in the building, to ascertain if the major occupying department, as the responsible lead, has put in place a building emergency organization, and prepared a fire safety plan as required by Treasury Board Standard 3-1. This initial survey will be completed by 31 July 2009, with ongoing monitoring conducted on a semi-annual basis thereafter.</p> <p><b>Royal Canadian Mounted Police’s (RCMP’s) response.</b> Agreed. The RCMP will work with Public Works and Government Services Canada to ensure that evacuation drills are done for the safety of the occupants. The RCMP commits to hold all evacuation drills required by federal legislation and that Treasury Board policy and standards are followed.</p>

Recommendation	Response
<p><b>3.88</b> (continued)</p> <p><b>*Note:</b> Effective February 2009, the Treasury Board of Canada Secretariat (TBS) became the major occupying department in one of the buildings included in our audit. As it has assumed responsibility for taking the required corrective action, TBS has responded to the recommendation instead of the Department of Finance Canada.</p>	<p><b>Statistics Canada’s response.</b> Agreed. Considering that none of the high buildings evaluated for this audit were found to be compliant by the OAG, Statistics Canada believes that the current specific requirements are ambiguous. Furthermore, it is our understanding that Statistics Canada, by conducting two drills per year, a complete building evacuation, and a partial one, conducts more evacuation drills than most other high buildings evaluated by the OAG for this audit. Human Resources and Skills Development Canada and the Treasury Board of Canada Secretariat are responsible for establishing clear guidelines and Statistics Canada will modify its evacuation drills procedures in compliance with the policies and standards.</p> <p><b>Transport Canada’s response.</b> We agree with this recommendation. However, we feel that actual fire alarms that occur during the year can be substituted as having adjoining floor fire drills and meet the spirit of the Standard. Should no fire alarm occur within the adjoining floor drill schedule, then an adjoining floor drill would be held. We will proceed with discussions with Human Resources and Skills Development Canada in order to obtain acceptance of our Fire Safety Plan.</p> <p><b>Treasury Board of Canada Secretariat’s response.*</b> Agreed. Members of the Building Emergency Organization (BEO) have received training in accordance with the revised fire safety plan and a training program has been established for managers, employees, and members of the BEO. A schedule for drill requirements was established on 19 December 2008 with quarterly and bi-monthly drills beginning January 2009. It should be noted that the Treasury Board of Canada Secretariat is currently reviewing the evacuation requirements contained in the Treasury Board Standard for Fire Safety.</p> <p><b>Veterans Affairs Canada’s response.</b> Agreed. The Department will establish compliance monitoring for evacuation drills nationally as required by federal legislation and Treasury Board policies and standards. Follow-up confirmation will be carried out during periodic site reviews conducted by Security Services.</p>

Recommendation	Response
<p><b>3.93</b> Departments should ensure that building fire emergency organizations are established and administered as required by federal legislation and Treasury Board policies and standards. (3.89–3.92)</p>	<p><b>Canada Border Services Agency’s response.</b> The Agency agrees with the recommendation. The Agency will ensure that building fire emergency organizations are established as required by policies and standards.</p> <p><b>Canada Revenue Agency’s response.</b> Agreed. The Agency already has established building fire emergency organizations, and is committed to administering these organizations as required by federal legislation and Treasury Board policies and standards.</p> <p><b>Canadian Food Inspection Agency’s response.</b> The Agency agrees with this recommendation. The Agency provided evidence that an organization existed and that meetings were being held as required by federal legislation and Treasury Board policies and standards. In accordance with Treasury Board policies, the Agency is now assuring that minutes from organization meetings are available.</p> <p><b>Canadian Heritage’s response.</b> Agreed. In addition to the individual, floor-by-floor meetings and training sessions with the floor wardens of the fire emergency organization, the Department will, as of 2009, conduct an annual meeting involving all the floor wardens to discuss fire and emergency procedures, their responsibilities, and the fire safety plan.</p> <p><b>Canadian Institutes of Health Research’s response.</b> Agreed. As the largest federal tenant in its building, the Canadian Institutes of Health Research currently administers the fire emergency organizations for all federal tenants.</p> <p><b>Canadian Radio-television and Telecommunications Commission’s response.</b> The Commission agrees with the recommendation and has already taken or will take corrective action.</p> <p><b>Citizenship and Immigration Canada’s response.</b> Agreed. The Department has been compliant with the conduct of annual meetings; however, it will ensure full compliance by ensuring that sufficient and appropriate records of such meetings are kept in the future.</p>

Recommendation	Response
<p><b>3.93</b> (continued)</p>	<p><b>Department of Justice Canada’s response.</b> Agreed. Evidence of a Building Emergency Organization meeting for 2006 was provided to the OAG in regards to the East Memorial Building. No evidence was provided for 2007. As a result of measures now in place, the Department will remain compliant in future years.</p> <p>Although no evidence of annual Building Emergency Organization meetings was provided to the OAG for 2006 and 2007 for the Exchange Tower in Toronto, measures now in place will ensure that we remain compliant.</p> <p><b>Fisheries and Oceans Canada’s response.</b> The Department agrees with this recommendation.</p> <p>We duly noted the audit results and comments previously provided by the OAG concerning the establishment and administration of building fire emergency organizations, and corrective measures have been implemented to comply with all applicable legislation, policies, and standards as of the first quarter of 2009.</p> <p><b>Foreign Affairs and International Trade Canada’s response.</b> The Department concurs with the recommended action, and agrees to establish and administer building fire emergency organizations as required by federal legislation and Treasury Board policies and standards. The Emergency Response Organization member list for 111 Sussex has been updated and annual meetings with all members will be held and recorded.</p> <p><b>Human Resources and Skills Development Canada’s response.</b> Agreed. Building Emergency Organization (BEO) teams are in place for all buildings in the National Capital Region where the Department is the primary occupant and responsible authority. A review of regional BEOs will ensure BEOs are in place across the country where required.</p> <p><b>Immigration and Refugee Board of Canada’s response.</b> Agreed. Fire emergency organization meetings have been held once a year, but no minutes were taken to substantiate that fact. The Board has already addressed this issue by keeping a log for future meetings.</p> <p><b>Indian and Northern Affairs Canada’s response.</b> The Department agrees with the recommendation and will ensure building fire emergency organizations are established and administered as required by federal legislation and Treasury Board policies and standards.</p>

Recommendation	Response
<p><b>3.93</b> (continued)</p>	<p><b>Industry Canada’s response.</b> Agreed. The Department already establishes and administers building fire emergency organizations for the C.D. Howe Building and the Heritage Building.</p> <p><b>Library and Archives Canada’s response.</b> Agreed. Library and Archives Canada maintains a Fire Emergency Organization (FEO) within the scope of this audit as required by federal legislation and Treasury Board policies and standards. A chief FEO and a deputy FEO were appointed and there are floor emergency wardens for all 10 floors of this entity.</p> <p><b>National Defence’s response.</b> The Chief Fire Inspector for the National Capital Region has ensured that active building emergency organizations are present in all buildings. Further, a letter will be sent to all building senior officers, by the end of April 2009, outlining their responsibility to hold the annual building emergency organization meeting in their respective buildings and to provide a meeting record in the form of official minutes to the Chief Fire Inspector on an annual basis.</p> <p><b>Natural Resources Canada’s response.</b> We concur with the recommendation. The Department will establish and administer building fire emergency organizations, as required by federal legislation and Treasury Board policies and standards, by March 2010.</p> <p><b>Privy Council Office’s (PCO’s) response.</b> Agreed. For buildings where PCO is the majority tenant, PCO will ensure that a fire emergency organization is established and maintained (in collaboration with other departments).</p> <p>For buildings where PCO is not the majority tenant, PCO will be a member of the fire emergency organization established by the majority tenant.</p> <p><b>Public Works and Government Services Canada’s response.</b> Agreed. A tracking system to ensure compliance with Treasury Board Standard 3-1 has been established in all of the Department’s workplaces. For all workplaces where the Department is the major occupying department, full compliance with the Treasury Board standard will be completed by 1 June 2009.</p>

Recommendation	Response
<p><b>3.93</b> (continued)</p> <p><b>*Note:</b> Effective February 2009, the Treasury Board of Canada Secretariat (TBS) became the major occupying department in one of the buildings included in our audit. As it has assumed responsibility for taking the required corrective action, TBS has responded to the recommendation instead of the Department of Finance Canada.</p>	<p>In its role as employer, the Department has initiated a survey of all other workplaces where it is not the major occupying department, but has employees occupying space in the building, to ascertain if the major occupying department, as the responsible lead, has put in place a building emergency organization and prepared a fire safety plan as required by Treasury Board Standard 3-1. This initial survey will be completed by 31 July 2009, with ongoing monitoring conducted on a semi-annual basis thereafter.</p> <p><b>Royal Canadian Mounted Police’s (RCMP’s) response.</b> Agreed. Building Emergency Organization (BEO) members should have periodic meetings to understand their roles and create viable action plans for evacuation. RCMP BEO members will receive a booklet, training, and recognition for being part of the BEO as required by federal legislation and Treasury Board policies and standards. The RCMP endeavours to do this by end of fiscal year 2009–10.</p> <p><b>Statistics Canada’s response.</b> Agreed. Statistics Canada conducts annual meetings with fire emergency officers, separately by floor. In that way, the discussion can focus on specific situations with respect to that floor. It was noted that some individuals have not attended the meetings. In future, we will invite these individuals to attend an alternate meeting, if appropriate, and we will send documentation and minutes from the meetings to those who were absent. Statistics Canada will also ensure that in the future, sufficient records regarding these meetings are maintained.</p> <p><b>Treasury Board of Canada Secretariat’s response.*</b> Agreed. In December 2008, the Building Emergency Organization was restructured. Since then, all members of the Building Emergency Organization have received training on their roles and responsibilities regarding building fire and emergency building evacuations.</p> <p><b>Veterans Affairs Canada’s response.</b> Agreed. The Department already has and will continue to establish and administer building fire emergency organizations as required by federal legislation and Treasury Board policies and standards.</p>

Recommendation	Response
<p><b>Fire safety administration and enforcement</b></p> <p><b>3.103</b> Human Resources and Skills Development Canada should establish the systems and practices it needs to administer and enforce the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization. (3.94–3.102)</p> <p><b>3.104</b> The Treasury Board of Canada Secretariat should ensure that the government’s policy objectives are being met, by obtaining timely and sufficient information from Human Resources and Skills Development Canada to ensure that it administers and enforces the Fire Protection, Investigation and Reporting Policy and its related standards. (3.94–3.102)</p>	<p><b>Human Resources and Skills Development Canada’s (HRSDC’s) response.</b> Agreed. HRSDC–Labour will work with Treasury Board of Canada Secretariat (TBS) officials to clarify roles and responsibilities, and to develop appropriate standards for the administration and enforcement of fire safety planning; HRSDC–Labour will also develop improved systems, processes, and procedures to manage the delivery of these services, and will work with custodial departments and TBS officials to develop new tools to track progress, monitor compliance with the Standard, and identify instances of non-compliance for enforcement purposes. Follow-up is in progress with the 7 buildings that had not submitted fire safety plans at the time of the audit. In addition, action has begun to address the issue of deficient fire safety plans as identified in 9 buildings. Finally, we will ensure that follow-up for the remaining buildings in the OAG sample is carried out.</p> <p><b>Treasury Board of Canada Secretariat’s response.</b> Agreed. The Secretariat will seek approval for a new Fire Protection Standard in fall 2009. The new Standard will clarify and strengthen the role of Human Resources and Skills Development Canada and will make it mandatory for departments and agencies to provide the necessary information in a timely way.</p>

## About the Audit

All of the audit work in this chapter was conducted in accordance with the standards for assurance engagements set by The Canadian Institute of Chartered Accountants. While the Office adopts these standards as the minimum requirement for our audits, we also draw upon the standards and practices of other disciplines.

### Objectives

The objectives of the audit were to determine whether

- Public Works and Government Services Canada can demonstrate that office buildings it administers are operated and maintained in a manner that effectively mitigates the risks related to the health and safety of building occupants;
- the federal government can demonstrate that it complies with key requirements of the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization in Public Works and Government Services Canada-administered office buildings; and
- the Labour Program of Human Resources and Skills Development Canada can demonstrate that it administers and enforces the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization in Public Works and Government Services Canada-administered office buildings.

### Scope and approach

We examined the key aspects of the management framework in place at Public Works and Government Services Canada (PWGSC) for operating and maintaining office buildings that it administers (both Crown-owned and leased buildings). Specifically, we focused on systems and procedures to ensure that risks to the health and safety of building occupants due to the condition and operating performance of buildings, their systems, and equipment were being effectively managed. We then tested whether a sample of 48 office buildings that the Department administered were adhering to important elements of the Department's framework. We focused specifically on the maintenance of selected fire safety equipment.

We also used the same sample of 48 office buildings to test whether the federal government complied with key requirements of the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (the Standard). Specifically, we audited compliance with key requirements of the Standard by reviewing evidence that the major occupying department in each building provided. The following 24 entities were identified as the major occupying department in at least one of the buildings in our sample:

- Canada Border Services Agency
- Canada Revenue Agency
- Canadian Food Inspection Agency
- Canadian Heritage
- Canadian Institutes of Health Research

- Canadian Radio-television and Telecommunications Commission
- Citizenship and Immigration Canada
- Department of Finance Canada
- Department of Justice Canada
- Fisheries and Oceans Canada
- Foreign Affairs and International Trade Canada
- Human Resources and Skills Development Canada
- Immigration and Refugee Board of Canada
- Indian and Northern Affairs Canada
- Industry Canada
- Library and Archives Canada
- National Defence
- Natural Resources Canada
- Privy Council Office
- Public Works and Government Services Canada
- Royal Canadian Mounted Police
- Statistics Canada
- Transport Canada
- Veterans Affairs Canada

Finally, the audit focused on the specific activities of Fire Protection Services (formerly called the Fire Commissioner of Canada) within Human Resources and Skills Development Canada's Labour Program. We assessed whether Fire Protection Services could demonstrate that it was administering and enforcing the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization. We interviewed Labour Program officials and reviewed departmental policies, procedures, and guidelines. We also looked at the systems and practices in place related to the review and the acceptance of fire safety plans that departments and agencies provided to the Labour Program's regional and district offices.

We sampled 48 buildings included in the PWGSC inventory of office buildings that it administered as of 31 January 2008. The buildings were selected based on full-time equivalent (FTE) information that PWGSC provided, in order to focus on buildings that house a significant number of federal employees. Of the 1,436 buildings the Department administered, we selected the 8 buildings with the highest FTE count (more than 3,000 FTEs), and we randomly sampled 40 buildings from the 110 buildings with FTEs between 500 and 3,000.

The audit did not examine the following:

- other real property assets that PWGSC or other government departments managed (for example, special-purpose facilities, engineering assets);
- buildings in the Parliamentary Precinct;
- the specific roles and responsibilities of departments and agencies, as employers, for ensuring occupational health and safety under Part II of the *Canada Labour Code* (with the exception of those related to fire safety planning); and
- planning for emergencies other than fires.

Our audit was not designed to assess the health and safety of a building but rather to examine the processes departments have in place to manage and mitigate risks to the health and safety of building occupants.

Our audit covered the period from 1 April 2006 to 31 March 2008.

Management reviewed and accepted the suitability of the criteria used in the audit.

### Criteria

Listed below are the criteria that were used to conduct this audit and their sources.

Criteria	Sources
We expected that the Treasury Board Policy Suite for the Management of Assets and Acquired Services would have established clear roles, responsibilities, and accountabilities for the operation and maintenance of federally administered office buildings, and for adherence to applicable health and safety authorities and standards.	<ul style="list-style-type: none"> <li>• Treasury Board Policy Framework for the Management of Assets and Acquired Services (2006), sections 2, 3.1, and 4</li> <li>• Treasury Board Policy on Management of Real Property (2006), Section 8.12</li> <li>• Treasury Board Common Services Policy (2006), Appendix E, Section 6.1, and Appendix F, Section 5.14</li> </ul>
We expected that Public Works and Government Services Canada's (PWGSC's) departmental policies and procedures to operate and maintain office buildings it administers would have been clear and conformed to Treasury Board policy requirements.	<ul style="list-style-type: none"> <li>• Public Works and Government Services Canada (PWGSC) Facility Maintenance Policy and Guidelines (1997)</li> <li>• PWGSC Asset Performance Monitoring Policy (1995)</li> <li>• PWGSC Building Condition Report Terms of Reference (2002)</li> <li>• PWGSC Building Management Plan National Call Letter (2006–07 and 2007–08)</li> <li>• PWGSC Building Performance Review National Call Letter (2006–07 and 2007–08)</li> <li>• PWGSC Lease Agreements, Schedule C, Part 1, Section 1(1)</li> </ul>

Criteria	Sources
We expected that PWGSC would have demonstrated that it regularly and systematically assessed and monitored the condition and operation of office buildings it administers to ensure compliance with applicable health and safety authorities and standards.	<ul style="list-style-type: none"> <li>• Treasury Board Policy on the Management of Real Property (2006), Section 6.1.3</li> <li>• Treasury Board Common Services Policy (2006), Appendix E, Section 6.1</li> <li>• PWGSC Facility Maintenance Policy and Guidelines (1997)</li> <li>• PWGSC Asset Performance Monitoring Policy (1995)</li> <li>• PWGSC Building Condition Report Terms of Reference (2002)</li> <li>• PWGSC Building Management Plan National Call Letter (2006–07 and 2007–08)</li> <li>• PWGSC Building Performance Review National Call Letter (2006–07 and 2007–08)</li> <li>• PWGSC Lease Agreements, Schedule C, Part 1, Section 1(1)</li> </ul>
We expected that PWGSC could demonstrate that it takes timely action to correct health and safety risks linked to the condition and operation of office buildings it administers.	<ul style="list-style-type: none"> <li>• PWGSC Facility Maintenance Policy and Guidelines (1997)</li> <li>• PWGSC Asset Performance Monitoring Policy (1995)</li> <li>• PWGSC Building Condition Report Terms of Reference (2002)</li> <li>• PWGSC Building Management Plan National Call Letter (2006–07 and 2007–08), Appendix D</li> <li>• PWGSC Building Performance Review National Call Letter (2006–07 and 2007–08)</li> <li>• PWGSC Lease Agreements, Schedule C, Part 1, Section 1(1)</li> </ul>
We expected that the Treasury Board policy framework for fire safety would have established clear roles, responsibilities, and accountabilities for fire safety planning and fire emergency organizations.	<ul style="list-style-type: none"> <li>• Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (1994), sections 1.1, 1.3, 2.1, 2.2, 3.2, and 4.1</li> <li>• Treasury Board Policy on Fire Protection, Investigation and Reporting (chapters 2–5) (1994), Policy Requirements section, Responsibilities section, and Appendix C</li> </ul>
We expected that the federal government, through the major occupying department in each PWGSC-administered office building, could demonstrate that an approved fire safety plan for the building was in place.	Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (1994), sections 2.2 and 2.3
We expected that the federal government, through the major occupying department in each PWGSC-administered office building, could demonstrate that fire evacuation drills had taken place as required.	Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (1994), sections 2.1(a), 2.1(b)(v), 2.2, and 4.1
We expected that the federal government, through the major occupying department in each PWGSC-administered office building, could demonstrate that the required fire emergency organization structure for the building was in place.	Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (1994), sections 3.1, 3.2, 3.4, 3.5, 3.7, and 3.13
We expected that the Labour Program of Human Resources and Skills Development Canada (HRSDC) could demonstrate that it administered the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization to ensure that departments and agencies had carried out their obligations under the Standard.	<ul style="list-style-type: none"> <li>• Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (1994), Section 1.4</li> <li>• Treasury Board Policy on Fire Protection, Investigation and Reporting (chapters 2–5) (1994), Responsibilities section</li> </ul>

Criteria	Sources
We expected that the Labour Program of HRSDC could demonstrate that it reported and followed up on situations of non-compliance with the Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization in PWGSC-administered office buildings.	<ul style="list-style-type: none"> <li>• Treasury Board Standard for Fire Safety Planning and Fire Emergency Organization (1994), Section 1.4</li> <li>• Treasury Board Policy on Fire Protection, Investigation and Reporting (chapters 2–5) (1994), Responsibilities section</li> </ul>

### Audit work completed

Audit work for this chapter was substantially completed on 2 December 2008.

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# Report of the Auditor General of Canada to the House of Commons—Spring 2009

## Main Table of Contents

### **Message from the Auditor General of Canada Main Points—Chapters 1 to 6**

<b>Chapter 1</b>	Gender-Based Analysis
<b>Chapter 2</b>	Intellectual Property
<b>Chapter 3</b>	Health and Safety in Federal Office Buildings
<b>Chapter 4</b>	Interest on Advance Deposits from Corporate Taxpayers—Canada Revenue Agency
<b>Chapter 5</b>	Financial Management and Control—National Defence
<b>Chapter 6</b>	Selected Contribution Agreements—Natural Resources Canada
<b>Chapter 7</b>	Special Examinations of Crown Corporations—2008

