RED TAG PERMIT POLICY

PURPOSE:

The purpose of this Red Tag Permit Policy is to establish a consistent process for identifying, controlling, communicating, and documenting the impairment or removal from service of fire protection systems, life safety systems, equipment, or building infrastructure that may affect the safety of patients, residents, staff, visitors, or property.

This policy ensures that all impairments are properly assessed, appropriate temporary risk-reduction measures are implemented, responsible parties are notified, and affected systems are restored to normal operation as quickly and safely as possible in accordance with applicable codes, standards, FM Global recommendations, and HIROC risk management practices.

POLICY STATEMENT:

When fire protection equipment or systems, including automatic sprinklers, standpipe systems, fire pumps, fire alarm systems, special hazard suppression systems, or related life safety infrastructure, must be removed from service, isolated, disabled, or otherwise impaired to facilitate maintenance, repair, testing, renovation, or construction activities, BCHS shall implement the Red Tag Permit System to formally manage the impairment.

No fire protection system impairment shall occur without appropriate authorization, risk assessment, notification, monitoring, and documentation.

A designated Impairment Coordinator shall be assigned for each impairment and shall be responsible for overseeing authorization, notifications, implementation of temporary fire protection measures, monitoring, restoration verification, and permit closure.

The Red Tag Permit shall remain active until:

- The impairment has been resolved.
- Required testing has been completed.
- All notifications have been made.
- Normal fire protection capabilities have been restored.

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INCLUSION CRITERIA

This policy applies to:

- All BCHS-owned, leased, or operated facilities.
- All fire protection, fire alarm, suppression, and life safety systems.
- BCHS employees.
- Physicians.
- Contractors.
- Volunteers.
- Students.
- Service providers performing work that may affect fire protection systems.

This policy applies to:

- Planned impairments.
- Emergency impairments.
- Construction activities.
- Renovation projects.
- Testing and maintenance activities.
- Equipment failures impacting fire protection systems.

This policy does not apply to:

- Routine inspections that do not require taking a system out of service.
- Activities that do not impair fire protection or life safety systems.

DEFINITION(S):

Fire Watch: A continuous patrol of an affected area conducted by trained personnel to identify fire hazards, detect signs of fire, and initiate emergency response activities.

Impairment: Any condition that renders a fire protection or life safety system partially or completely ineffective.

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Impairment Coordinator: The individual designated to oversee the impairment process, including authorization, notifications, implementation of controls, monitoring, testing, restoration, and permit closure.

Red Tag Permit: The formal document issued to authorize and document a fire protection system impairment and associated risk controls.

Temporary Fire Protection Measures: Interim controls implemented to reduce fire risk while a fire protection system is out of service. Examples include fire watches, charged hose lines, additional portable extinguishers, and temporary detection or suppression systems.

Hot Work: Any operation involving open flames or producing heat or sparks, including welding, cutting, brazing, soldering, torching, and grinding.

Emergency Impairment: An unplanned event that results in the immediate loss or degradation of a fire protection system.

PROCEDURE:

PRE-IMPAIRMENT REQUIREMENTS

Before any fire protection system is removed from service:

- Complete a Pre-Impairment Risk Assessment.
- Define the scope and expected duration of the impairment.
- Assess impacts on patient care, resident care, clinical operations, and building occupants.
- Obtain approval from the designated manager, maintenance lead, Fire Safety Officer, or Impairment Coordinator.
- Ensure required personnel, materials, equipment, and replacement parts are available.
- Develop a temporary fire protection plan.
- Notify affected departments and stakeholders.
- Notify the fire department, monitoring company, and insurer as required.
- Complete and issue a Red Tag Permit.
- Display the permit at the affected system control point.

DURING THE IMPAIRMENT

During the impairment:

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- Minimize outage duration.
- Implement all identified compensatory measures.
- Maintain fire watch requirements where required.
- Suspend hazardous operations where practical.
- Prohibit unauthorized hot work.
- Maintain emergency access and exit routes.
- Update the Red Tag Permit as conditions change.

SYSTEM RESTORATION

Following completion of work:

- Verify repairs have been completed.
- Return systems to normal operating mode.
- Conduct required testing and inspections.
- Verify alarm monitoring functionality.
- Remove temporary protection measures only after successful restoration.
- Notify all affected stakeholders.
- Close the Red Tag Permit.
- Retain documentation according to records retention requirements.

EMERGENCY IMPAIRMENTS

In the event of an emergency impairment:

- Implement immediate life safety precautions.
- Notify appropriate personnel and authorities.
- Initiate temporary fire protection measures.
- Issue a Red Tag Permit as soon as practicable.
- Follow the same monitoring and restoration requirements as planned impairments.

UNAUTHORIZED IMPAIRMENTS

Where a fire protection system is discovered impaired without authorization:

- Notify Facilities, Security, and Fire Safety immediately.
- Implement temporary fire protection measures.
- Initiate an incident investigation.
- Complete an incident report.
- Implement corrective actions and monitoring.

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ESCALATION REQUIREMENTS

The following escalations shall occur:

Condition	Notification Requirement
Fire pump impairment	Director, Facilities immediately
Impairment exceeding 8 hours	Facilities Manager
Impairment exceeding 24 hours	Senior Leadership
Multiple buildings affected	Emergency Preparedness
Fire during impairment	Executive Leadership and Risk Management

DOCUMENTATION AND /OR COMMUNICATION

The following records shall be maintained:

- Pre-Impairment Risk Assessments.
- Red Tag Permits.
- Fire Watch Logs.
- Notification Records.
- Audit Reports.
- Incident Investigations.
- Restoration Testing Records.

Documentation shall be completed using approved BCHS forms and retained according to organizational records retention requirements.

The following stakeholders shall be notified as appropriate:

- Affected departments.
- Clinical programs.
- Security Services.
- Facilities Management.

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- Fire Department.
- Alarm Monitoring Company.
- Insurer (FM Global/HIROC).
- Executive Leadership for significant impairments.

EDUCATIONAL REQUIREMENTS

Personnel involved in impairment management shall complete training prior to assuming responsibilities.

Training shall include:

- Red Tag Permit procedures.
- Risk assessment requirements.
- Fire watch practices.
- Temporary fire protection measures.
- Notification requirements.
- Restoration and testing procedures.
- Documentation requirements.

Contractors shall receive orientation to BCHS impairment management requirements before undertaking work that may affect fire protection systems.

Training records shall be maintained by BCHS.

REQUIRED SAFETY PRACTICES

During any fire protection system impairment:

- Minimize the duration of outages.
- Implement compensatory fire protection measures.
- Control ignition sources.
- Maintain good housekeeping.
- Restrict hot work unless authorized.
- Provide additional fire extinguishers where required.
- Establish fire watches when required.
- Maintain emergency access and egress routes.
- Restrict access to authorized personnel.

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- Protect system controls from tampering.
- Verify system functionality before returning equipment to service.

Any employee, supervisor, Fire Safety Officer, Security representative, or Facilities representative who identifies an unsafe condition associated with an impairment may stop work until the condition is assessed and appropriate controls are implemented.

QUALITY MONITORING PROCESS

The Facilities Manager, Fire Safety Officer, or designate shall monitor compliance through permit reviews, audits, performance indicators, incident investigations, and annual program evaluations.

Monitoring Activities

Monthly Reviews

Monitor:

- Number of impairments.
- Planned versus emergency impairments.
- Duration of impairments.
- Overdue impairments.
- Fire watch compliance.
- Documentation deficiencies.

Quarterly Audits

Review:

- Risk assessments.
- Notification records.
- Permit completion.
- Fire watch records.
- Testing documentation.
- Contractor compliance.
- Training records.

Annual Program Review

Review:

- Audit findings.
- KPI performance.

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- Fire incidents and near misses.
- Training compliance.
- Contractor performance.
- Opportunities for improvement.

Results shall be reported to the appropriate BCHS leadership committee.

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APPENDICES

Appendix A – Red Tag Permit

https://redetag.fm.com/Pages/CreateNew.aspx

Appendix B – Hot work Tag Permit

https://fmglobalpublic.hartehanks.com/AssetDisplay?acc=11FM&itemCode=F2630

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RELATED PRACTICES AND/OR LEGISLATION:

BCHS RELATED DOCUMENTS

- Fire Safety Plan
- Hot Work Permit Program
- Contractor Management Program
- Emergency Preparedness Program
- Business Continuity Program
- Facilities Preventive Maintenance Program
- Incident Reporting Policy

LEGISLATION AND STANDARDS

- Ontario Fire Code
- Ontario Building Code
- Occupational Health and Safety Act (Ontario)
- National Fire Code of Canada
- NFPA 25
- NFPA 72
- FM Global Property Loss Prevention Standards
- Accreditation Canada Standards
- HIROC Risk Management Guidance

REFERENCES:

FM Global. (2023). *Property Loss Prevention Data Sheet 10-7: Impairment Management*. FM Global. https://www.fmglobal.com

Healthcare Insurance Reciprocal of Canada (HIROC). (2026). *Contractor Management Manual*. https://www.hiroc.com

National Fire Protection Association. (2023). *NFPA 25: Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*. NFPA.

National Fire Protection Association. (2022). *NFPA 72: National Fire Alarm and Signaling Code*. NFPA.

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Ontario Ministry of the Solicitor General. (current edition). *Ontario Fire Code*. Government of Ontario.
Government of Ontario. (current edition). *Occupational Health and Safety Act*. Government of Ontario.
Northwestern University. (n.d.). *Fire Protection System Impairments Red Tag Program*. https://www.northwestern.edu
Emory University. (n.d.). *Red Tag Procedures*. https://campserv.emory.edu

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