



CNC SPACE APPROVAL AND SPACE SAFETY REVIEW

WHAT IS DIFFERENT?

Approval of Space

Before any space is used for CNC, it must now be approved in a three-step process that is different from approval under the NLCR. (The NLCR focused only on approval from your fire department.)

Under the CNCR, you are required to seek approval from the fire department and other local authorities (as necessary) before using space in a facility for CNC. You are also required to conduct a space approval check prior to use by children, and when there are changes to the space, or at least annually. A space safety check must ALSO be completed before use, and on an ongoing basis.

These approvals are essential to ensure that your program meets local standards and that you manage the risks in the CNC space.

The requirements no longer set out the floor level on which care can be provided. That will be determined by the local fire department when they approve your fire safety plan.

Summary of Space Approvals under the CNCR

1. Approval by Local Authorities (the fire department and other authorities, as necessary)
 - Prior to using the space for CNC.
 - When there is a change to the space (such as a renovation).
2. Space Approval Form: Approval by the ISO
 - Prior to using the space for CNC.
 - When there is a change to the space (such as a renovation).

DECEMBER 2012

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Funded by: Citizenship and Immigration Canada / Financé par: Citoyenneté et Immigration Canada

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- At least once a year after the most recent approval.
3. Space Safety Check
- On a regular basis, when space is dedicated to CNC and used exclusively for CNC.
 - Immediately before a CNC session, when the space has been used by others.

WHY IS IT IMPORTANT?

Approval by Local Authorities

The National Fire Code addresses fire protection and fire prevention in the ongoing operation of buildings and facilities. The local fire department is responsible for ensuring that the facilities meet the standards. Approval by the Fire Department and other authorities such as the planning department and public health will ensure that your CNC space meets all local standards and provide a safe environment for the care of the children.

Space Approval Form: Approval by the ISO

Space used for children has to be looked at closely and reviewed for safety “through the eyes of a child”. It is the responsibility of adults to find and remove any hazards that might pose a risk to a child in the space before it is used for CNC. Reviewing the space before you use it for CNC will help you manage risks associated with the space by finding potential causes of harm and identifying appropriate uses for the space.

For example, some spaces may be suitable for older children but might not be appropriate for the care of infants, or a space review might show that the space cannot be used for CNC and, therefore, cannot be approved. Also, the space may be too far away from parents for caring for young children or it may be too close, where CNC would disrupt the adult program. This review may occur several weeks or months before space is actually used for children.

Steps in the space approval process will be set out in your CNC Space Approval Form which will include not only a CNC Space Approval Checklist with items identified in Appendix 1 of the CNCR, but also a plan for changes, if the review shows that changes must be made before the space can be used safely for children, emergency information related to the space (e.g. evacuation routes), and contact information for the person carrying out the review.

An annual review of the space using the CNC Space Approval Form will allow you to identify and address any new space-related risks. These risks may mean that the space can no longer be used for



children, or more likely, that you will need to develop a plan to address them. For example, during a renovation or other changes to the space, something that might cause harm to a child might have been overlooked and, following a review, can be safely eliminated before any harm occurs.

Space Safety Check

The initial space approval process determines some time in advance whether it is likely the space can be used safely for children. It will not let you know if the space is safe immediately before the children arrive. To confirm safety at the time space will be used, it is necessary to check it again using a CNC Space Safety Checklist.

Space Dedicated to CNC

If your space is in a permanent location and is dedicated to CNC (no one else uses it for any other purpose), you should conduct a safety check before the space is used for CNC, and at regular intervals. It is easy for busy staff working with the children to overlook or miss a hazard caused by use of the space, toys or other equipment.

When CNC Staff take the time to check the space using the Space Safety Checklist on a regular basis, they will be able to identify and eliminate some of the risks they may have overlooked.

Space Used by Others

On the other hand, if your CNC space is used by others before you use it for CNC, you could be unaware of potential hazards (e.g. if it was used for a meeting, someone might have dropped a paper clip that a child might swallow). When using space that is not dedicated to CNC and is used by others, it is necessary to complete the CNC Space Safety Checklist before a child is present, every time you provide CNC, and to address any issues of concerns before a child arrives.

If you find any hazards that cannot be reduced before a child arrives, you may have to find other space. This safety check is especially important before you offer mobile care at a location away from your site.

IMPLEMENTATION

- Review and familiarize yourself with Part 2 of the CNCR - The Facility.
- Approval by Local Authorities
- If you are using a space for the first time (e.g. when opening a new program) or renovating an existing space, contact your local authorities in advance to determine what approvals you will



need.

- Find out who has responsibility for the fire safety plan for your building. That fire safety plan will relate to all uses of the building, and if the building is shared by others, the fire safety plan may not be the sole responsibility of the ISO.
- Identify whether the existing fire safety plan provides for “occupancy” by children and whether the areas used for CNC are identified in the plan. If they are identified, the plan will provide information about emergency evacuation routes and procedures, including when fire drills are necessary. (You will need this information for compliance with 4-8 of the CNCR.)
- If you are using building space for the first time, you will need to make sure that use for children is added to the building’s fire safety plan. If you are caring for infants, it is especially important to ensure that the plan provides for occupancy by very young children who may not be walking. If you are in doubt about how to proceed and would like further information, many fire departments have posted a template of their fire safety plan on the web along with information about how to get it approved. Given that the fire safety plan relates to the entire building, you will need to coordinate efforts to get fire approval with others. Since it may take some time to carry out all steps to approval, you will need to begin the process well before you open your program.

Note: If you are using a school or a building owned by a municipality, the fire safety plan may already be approved. Check with the building manager. If you are offering infant care, make sure you advise the manager and ask if the building has been approved for occupancy by infants.

- Be sure that the approval has been given prior to offering care. You should never operate a CNC program without the appropriate approvals by local authorities.

Approval of Space

- Develop a CNC Space Approval Form that will include all items in 2-2.b.
- Develop a CNC Space Approval Checklist to include with your form. When developing your checklist, consult Appendix 1 to the CNCR. The items identified in Appendix 1 are mandatory and MUST be included in your checklist. You can also include additional items relevant to your space.
- Develop any associated procedures that you may wish to have to meet the CNCR (e.g. identify when the annual review will take place, who will be responsible for addressing any issues and so on).
- Determine who will be responsible for initially approving the space and completing the document



on a yearly basis.

PROCEDURES FOR COMPLETING A CNC SPACE APPROVAL FORM

- Examine all of the spaces at a location where you hope to offer CNC.
 - Complete a CNC Space Approval Checklist for each of the spaces you want to use to determine if each is appropriate for CNC.
 - If changes need to be made before space approval can be given, give information about the changes to the person responsible for ensuring the changes are completed. Confirm that all changes are made before space is used for CNC.
 - Using the approved Fire Safety Plan for the building, identify the necessary evacuation information that is relevant to the space, and ensure that it is available to CNC staff who will be providing care in the space.
 - Identify and communicate any additional information about the space that will be helpful to CNC staff.
 - Ensure that the space approval form includes the name, title and signature of the ISO staff member completing the space assessment and the date on which the approval decision was made.

Space Safety Check

- Develop a Space Safety Checklist that includes at least the items from the CNC requirements Appendix 2. The items identified in Appendix 2 are mandatory and **MUST** be included in your checklist. You can also include additional items relevant to your space.
- Develop procedures for conducting the space safety check including procedures to identify who is responsible for completing the checklist, when the checklist is to be completed, and what steps are to be taken if any hazards are found.

Note: When making a plan to eliminate hazards, it is important to include steps to take to ensure children are safe while issues are being addressed.

- Train CNC Staff so that they know how to conduct a safety check and are aware of procedures to take if hazards are identified.
- Review the results of the space safety check and ensure that the identified issues are permanently



addressed.

Special Information for Long Term and Combined Care

- Determine how often CNC Staff will complete the CNC Space Safety Checklist. Depending on your program, it may be completed daily, weekly or monthly. It is recommended that the checklist be completed at least once a month.

Special Information for Short Term Care

- CNC Staff must complete a CNC Space Safety Checklist prior to the operation of each CNC session if the space is used for purposes other than CNC.

Special Information for Mobile CNC

- When providing mobile CNC, it is important to provide CNC staff at the temporary location with relevant information from the CNC Space Approval Form so they have the information they need about the space when they are at the site. This information will become part of the CNC Session Record as required in 1-4.d.1.
- Take special care when completing a CNC Space Safety Checklist at a mobile location. Space there may not have been used recently for the care of children and changes may have occurred since the space was approved for use. CNC Staff will need procedures to follow when the space includes hazards.

Note: If it has been some time since a space was approved for CNC, it may be necessary to re-visit the space a few days ahead of time to confirm that the information on the CNC Space Approval Form remains current.

- A completed CNC Space Safety Checklist must be included in the CNC Session Record as required in 1-4.d.2.

SUPPORTING DOCUMENTS

- Sample CNC Space Approval Checklist – (CNCR Appendix 1)
- Sample CNC Space Safety Checklist – (CNCR Appendix 2)



REQUIREMENTS

PART 2: THE FACILITY

The ISO shall ensure that

APPROVAL FOR USE

2-1 LOCAL APPROVAL

General

- a. Before a facility is used for CNC, proof is on file that the building and the space to be used for CNC meet the requirements of relevant local authorities.
- b. When the ISO has responsibility for a facility, relevant local authorities are informed when changes are made to the building or its usage.

Fire

- c. Before a facility is used for CNC, there is on file a fire safety plan for the building and all of its usages including the care of children. The fire safety plan is approved by the municipal fire department and implemented as required under the National Fire Code.
- d. When the ISO has responsibility for a facility, the municipal fire department is informed when changes are made to the building or its usage that may affect the fire safety plan.

2-2. APPROVAL BY THE ISO IN ADVANCE OF USE

CNC Space Approval Form

- a. A CNC Space Approval Form is used to assess and approve space at the following times:
 2. Prior to use for CNC; and
 3. When there are changes to the space or at least annually, thereafter.
- b. A CNC Space Approval Form includes the following:
 3. A CNC Space Approval Checklist that addresses the relevant safety requirements in Part 2 of these CNC Requirements, including the mandatory items identified in Appendix 1 as



they apply to the type of CNC being provided, the ages of the participating children, and the location of the program.

4. A Plan for Changes required following assessment of the space.
 5. Emergency information relevant to the space from the building's fire safety plan, including information required in section 2-4.d of these CNC Requirements.
 6. The name, title and signature of the ISO staff member responsible for the assessment and the date on which the approval decision was made.
- c. When findings show that the space can be used for CNC if specific changes are made, an indication that all changes are complete before a child is present in the space.

2-3 CNC STAFF CONFIRMATION OF SPACE SAFETY AT THE TIME OF USE

CNC Space Safety Checklist

- a. CNC staff complete a CNC Space Safety Checklist to confirm space safety at the following times:
 2. On a regular basis, when space in a permanent location is dedicated to CNC and used exclusively for CNC; and
 3. Immediately before providing CNC, including mobile CNC, in space that has been used by others.
- b. The CNC Space Safety Checklist addresses the relevant safety requirements in Part 2 of these CNC Requirements, including the mandatory items identified in Appendix 2 as they apply to the type of CNC being provided, the ages of the participating children, and the location of the program.
- c. A completed CNC Space Safety Checklist includes the name and signature of the CNC staff member who completed the checklist and the date and time when it was completed.
- d. A CNC staff member who finds that any aspect of the space may pose a hazard to a child takes steps to ensure that the potential hazard has been eliminated or an alternate space found before a child is present in the space.

ELEMENTS OF THE SPACE

2-4 EMERGENCY PROVISIONS



Exits and Evacuation

- a. Any space used for CNC has clearly marked pathways, free of obstruction, to all emergency exits.

Emergency Contact

- b. Wherever a group of children is receiving care, CNC staff have direct access to reliable communications equipment.
- c. Where possible, at each site where children are receiving CNC, the communications equipment required in section 2-4.b includes an operable, direct-line, hard-wired telephone.
- d. Wherever a group of children is receiving care, CNC staff have immediate access to the following information:
 - 1. Contact information for
 - B. Fire, ambulance and police, in addition to 911.
 - C. Poison control.
 - D. Children's Aid Society.
 - E. Building Emergency contact.
 - F. An ISO representative.
 - 2. Information about the building location and evacuation routes, including:
 - C. The building street address.
 - D. The main evacuation route from the space.
 - E. An alternate evacuation route.
 - F. Route from the space to the location of the parent activity.
- g. Information required in section 2-4.d is located as close as possible to the communications equipment.



2-5 LOCATION

- a. The space to be used for a group of children receiving CNC is located in a separate CNC room that is as close as possible to the room where the parents are located while avoiding disruptions to the adult program.