

Government consultation on Fire Safety Design for Schools – Building Bulletin 100

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation.

B. Key points

3. There are three key elements that ASCL members would like to see with regard to building design and fire safety. Firstly, equality and equity of provision wherever schools and colleges are located in the UK and whatever the context of their site(s). Secondly, sufficient funding to implement appropriate safety measures to keep, pupils, staff and resources safe. Thirdly, clear guidance on the requirements on school and college leaders.
4. Improvements to fire safety in schools and colleges have included general public awareness campaigns on fire safety, improved site security, development of design principles with a safety-first approach, and a better understanding of the use of materials in school design, including those that are potentially combustible.
5. However, despite these developments, England has not seen a marked reduction in the number of school fires. Education commercial insurance provider, Zurich [reported](#) that fire crews have been called on to respond to 2,300 incidents in schools in England (of which 47 schools were destroyed, and 230 were seriously damaged). Between April 2015 and April 2020 1,467 primary schools and 834 secondary schools were victims of fire incidents. Just 2% of these were fitted with sprinklers.
6. The total number of school fires in the UK includes fires of varying degrees, from small fires that are caught early and extinguished, to large fires that destroy whole schools. Larger and older school buildings, including those with onsite preparation kitchen facilities and those which have more electrical equipment (including equipment in specialist learning spaces) are likely to be at higher risk.

7. It is possible to calculate the direct financial cost of a fire, but there are other impacts on children and young people's education and wellbeing which are equally, if not more, important.
8. A fire's devastating effects spread much further than a school's budget. It disrupts the lives of pupils and school staff. The aftermath of a fire can lead to a requirement for temporary classrooms for considerable periods of time, whilst everything from examination papers, school records, student submissions, coursework, university applications, teaching notes, resources and learning aids can be lost forever.
9. NFER's 2007 report '[The impact of school fires](#)', commissioned on behalf of the Local Government Association and British Automatic Sprinkler Association (BAFSA), reported that an estimated 90,000 children are disrupted by school fires each year, and that those from the most disadvantaged backgrounds are more likely to be affected. The review also found that fires have large direct and indirect costs. The cost of school fires has risen from £49 million in 1995 to £67 million in 2005. Damage can affect exam results, require the provision of temporary accommodation, and result in disruption as a result of rebuilding, and insurance cannot replace lost school work and lost school days.
10. Children and young people's education has already been severely impacted by the COVID-19 pandemic. Implementing robust fire safety standards will help to minimise further disruption.
11. The Prime Minister has pledged £1.5 billion to fund a decade-long school rebuilding and repair programme. Based on the impact of large fires alone, commercial education insurance provider Zurich estimates that the repair for school fires could hit £320 million over 10 years – a significant portion of the government's planned investment.
12. The government's Risk Protection Arrangement (RPA) is marketed as an alternative to commercial insurance for academy and Local Authority schools. It is therefore in the government's own interest to improve the resilience and the risk profile of the UK education systems estate, fabric, and infrastructure.
13. As building methodologies and systems continue to shift further away from traditional, largely non-combustible, structures towards lighter-weight structures, many of which are evidenced to be less resilient to the effects of fire, there is a need to consider appropriate protection systems.
14. Safety should be an absolute priority, with regulations defining the legal levels of minimum protection required. It is deeply concerning that England's minimum protection standards for schools fall far below those of Scotland and Wales where, for example, sprinklers are already mandatory in schools.
15. We know that some Local Authorities have made clear commitments to ensuring the highest levels of safety. Derby City Council and Derbyshire County Council have signed a statement of intent regarding mandatory sprinklers in new-build schools and those undergoing renovation. Suffolk County Council has similarly committed to ensuring that all SEN schools have sprinkler systems fitted. While this is welcome, these levels of protection should be mandated at a national level.
16. ASCL was recently a signatory, alongside a cross-section of unions, businesses, professional bodies, trade bodies and specialist organisation in the UK with an interest in fire safety and protection in schools, to a letter to the Secretary of State for Education on fire safety. In this letter, we set out our concerns about some of the proposals in Building Bulletin 100: Fire Safety Design for Schools. We strongly urge the government

to reconsider and expand their proposals to mandate sprinklers in all new build and major refurbishment projects.

17. Consideration should also be given to the sites of new build schools and monitoring of air quality near existing schools. It is unacceptable that new schools have recently been built in areas of very poor air quality and are not able to have opening windows as a result.
18. It is important that fire safety measures and technical details keep people as safe as possible and consider potential vulnerabilities of individuals, especially those who would have an increased risk of not being able to evacuate by themselves. Conditions of work must be safe.
19. Any new or revised requirements which will incur material capital expenditure must be funded and not come from existing budgets.

C. Answers to specific questions

Fire Suppression Systems

Question 1: BB 100 recommends that automatic fire suppression systems should be installed in all new school buildings that have a storey with a finished floor level over 11m above ground level. Do you agree with this recommendation? If not, please explain why.

20. ASCL agrees in part with this recommendation. However, our members would prefer to see the requirement extended to all new school buildings, whether or not they are above 11m. This requirement is already in place in Wales and Scotland.

Question 2: BB 100 recommends that automatic fire suppression systems should be installed in all new special school buildings. Do you agree with this recommendation? If not, please explain why.

21. Yes, ASCL agrees with this recommendation.

Question 3: BB 100 recommends that automatic fire suppression systems should be installed in all new boarding accommodation. Do you agree with this recommendation? If not, please explain why.

22. Yes, ASCL agrees with this recommendation.

Question 4: BB 100 offers some relaxations of requirements in school buildings fitted with automatic fire suppression systems, such as larger fire compartment sizes. Is there scope for easing requirements further in such buildings, or are the current relaxations sufficient?

23. ASCL does not support the relaxation of requirements. We recognise that this consultation focuses on new build schools, but we would urge the government to fit fire suppression systems in all education buildings, including retro-fitting systems in the existing school estate. Prioritisation should be given to buildings where, due to lack of capital funding, the fabric or design is higher risk from fire.
24. According to Department for Education FoI data, 248 new schools were constructed since 2015, of which only 21 had sprinklers installed. There were 468 major school

refurbishments since 2015, of which 69 had sprinklers installed. Just 8.5% of new schools built since 2015 are sprinklered and 14.7% of majorly refurbished schools since 2015 are sprinklered.

25. NFER's [‘The impact of school fires’](#) report, commissioned on behalf of the Local Government Association and British Automatic Sprinkler Association (BAFSA), reported that while the measurable cost of arson attacks on schools in 2001 stood at £65 million, the real cost of fires was nearer to £115 million. A 2006 survey of 938 schools by the Arson Control Forum found that 43% had suffered at least one fire in the last three years. Metropolitan areas experience higher frequencies of school fires and correspondingly suffering the greatest total cost.
26. A [report](#) from the London Fire Brigade (LFB) in August 2018 stated that school fires in London had increased by 34% in one year. The LFB has been campaigning for a number of years to make sprinklers mandatory in new schools and during major refurbishments. It is their expert view that sprinklers are especially important during the summer holidays when buildings are empty and fires can smoulder undetected, causing extensive and expensive damage.
27. The LFB reported a total of 90 fires in preschools, nurseries, primary schools, and secondary schools in 2017, up from 67 in 2016. Fires at colleges and universities also increased from 20 to 28 in the same period.

Fire Detection and Alarm Systems

Question 5: Do you agree that this minimum level of provision is right for these types of schools? If not, please explain why.

28. No. ASCL's view is that all education spaces should have fire detection and alarm systems fitted.
29. The Home Office National Statistics report [‘Detailed analysis of fires attended by fire and rescue services’](#) in England for April 2019 to March 2020 states that “Fires where a smoke alarm was not present accounted for 46 per cent of all primary other building fires in 2019/20. This has been relatively stable since 2012/13.” Clearly there is a correlation between the lack of a fire detection system and the need for fire services to attend. The same report stated the peak time for calls was between 4pm and 10pm. These are times that most school buildings are unoccupied, reinforcing the need for fire detection and suppression systems.

Vertical Means of Escape

Question 6: The new version of BB 100 says “new, multi-storey school buildings must have at least two staircases and single escape stairs are not acceptable”. Do you agree with this recommendation? If not, please explain why.

30. Yes, ASCL agrees with this recommendation. Given that we do not know for how long we may need to retain or reinstate COVID-19 safety measures in schools and colleges, this requirement could also be useful for deploying one-way systems.

Question 7: Do you agree that evacuation lifts should be provided in new multi-storey schools, rather than standard passenger lifts and that the level of provision recommended is reasonable? If not, please explain why.

31. Yes, ASCL agrees that evacuation lifts should be provided in multi-storey schools. This would seem a more inclusive and equitable standard and provide an evacuation option for those who are unable to use stairway access.

32. ASCL does not have the expertise to comment on the appropriate technical standard for lifts.

Compartmentation

Question 8: Do you agree that the recommended compartment sizes in BB 100 should be increased to match the recommendations in AD B for educational buildings? If not, please explain why.

33. ASCL does not have the expertise to comment on the recommended compartment sizes.

Boarding accommodation

Question 10: Do you consider this guidance is detailed enough? If not, please explain why.

34. ASCL does not have the expertise to comment on whether fire safety guidance for boarding schools is sufficiently detailed.

Cladding

Question 11: Do you agree with these requirements? If not, please explain why.

35. ASCL does not have the expertise to comment on the minimum technical standards for cladding.

Fire safety management

Question 12: Do you agree with this approach and do you think the guidance is sufficient? If not, please explain why.

36. ASCL does not have the expertise to comment on whether fire safety guidance is sufficient.

D. Conclusion

37. I hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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