![NFCC National Fire Chiefs Council — The professional voice of the UK Fire & Rescue Service]

COVID-19 – Protection – Advice for Student Accommodation

6th April 2021 – Issue 3

1. Introduction

1.1.   This advice note is to provide consistency for Fire and Rescue Services (FRSs), when issuing guidance regarding student accommodation regulated under the Regulatory Reform (Fire Safety) Order 2005 (FSO) during the COVID-19 pandemic. It is applicable to premises where student accommodation is wholly or partly provided. While it is provided to assist FRS, the guidance contained therein may also be of use to providers and landlords of student accommodation and other interested parties.

1.2.   This guidance is valid for the duration of any restrictions introduced to manage the spread of COVID-19, after which it should be disregarded. It contains specific messages and areas for consideration that can be used to augment the work being carried out across the UK FRS[1].

1.3.   On 22nd February 2021, HM Government published their 'COVID-19 Response – Spring 2021' document. This contained an overview of the current national picture with regard to COVID infections, hospitalisations, deaths, economic impact, vaccine response and other elements. It also contains a roadmap which outlines the staged approach to coming out of the current lockdown.

1.4.   This roadmap outlines a 4-step approach to relaxing the current national lockdown restrictions. This roadmap will be applied in a uniform way across England. The devolved administrations are setting out separate plans for Scotland, Wales and Northern Ireland. While the general approach in this document will still be relevant, specific elements such as timescales will depend on the specific plans set by those administrations.

1.5.   The reopening of education as part of the recovery roadmap means that student accommodation is now being used in the intended way. Communication with the RP to determine current occupancy levels will assist FRS to target their resources effectively.

1.6.   This guidance is reviewed and amended where necessary by the NFCC Protection Policy and Reform Unit. Please ensure that you have the most up to date version- all NFCC COVID-19 guidance can be found here. The government has also provided

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[1] *The purpose of this non-statutory guidance is to provide fire and rescue services with general advice to assist with a consistent, standardised approach across all services. The guidance does not constitute legal advice. Fire and rescue services' legal duties will remain those specified by law, in particular article 26 of the Regulatory Reform (Fire Safety) Order 2005, during the COVID-19 pandemic, but if any fire and rescue services consider that difficulties arise in relation to compliance with those duties, they should take legal advice.*

advice and guidance on a range of premise types regarding COVID-19 which can be accessed via the GOV.UK website.

1.7.   NFCC have produced COVID-19 - Protection - Advice to Premises, Issue 7, which contains advice and guidance regarding fire safety and COVID-19 that will be applicable to student accommodation that will answer many enquiries. There is also a frequently asked questions section that will address many specific queries.

1.8.   The subjects below cover the most common questions to date. This is not an exhaustive list and will be updated as more information and common enquiries become apparent.

2.   The need to review Fire Risk Assessments

2.1.   The FSO is the current fire safety legislation in England and Wales, throughout the COVID-19 pandemic there has been no relaxation in this law. This legislation places the responsibility of ensuring there are adequate fire safety measures in place in the event of fire on the Responsible Person as defined in the legislation. The Responsible Person has a duty to make a fire risk assessment which is suitable and sufficient in identifying the required fire safety measures, and where deficiencies are identified, suitable temporary mitigation measures until the deficiencies are addressed.

2.2.   The fire risk assessment should be reviewed in relation to any changes emerging from enacting any specific COVID-19 procedures that may affect fire safety. The fire risk assessment is specific to a premises and should assess the balance between the risk from fire and risk from COVID-19, whilst maintaining suitable and sufficient fire safety measures. Assistance is available from the Health and Safety Executive on carrying out a COVID-19 risk assessment which some Responsible Persons may find helpful.

2.3.   Reviews should be recorded in the premises fire risk assessment, where doubt exists, advice should be sought from a competent fire risk assessor and advice on finding one can be located here.

3.   COVID-19 measures adversely affecting fire safety

3.1.   All premises being used must do so within the government guidelines, premises following this guidance are deemed COVID Secure. This means the risk from COVID-19 should be reduced to a tolerable level making the premises safe to use for its intended purpose. Fire safety must be considered alongside the need to make a premises COVID Secure as some control measures which reduce the risk from COVID-19 may have an adverse effect on fire safety.

3.2.   It will be necessary to review and update the premises fire risk assessment to ensure it is current and reflects the way the premises is operating, with the risk from fire assessed against the risk from COVID-19.

3.3.   Points to be considered may include but are not limited to:

- Where occupant levels have changed this may affect evacuation arrangements in event of fire.
- Where parts of the premises are not being used or are being used differently this may impact the means of escape.

- Social distancing control measures should not adversely affect fire safety measures e.g. obstructing means of escape, fire escape signage, fire detection and alarm systems, sprinkler or suppressions systems.
- If one-way systems or processes are introduced to control the flow of occupants, its impact on the means of escape must be assessed to ensure occupants have a suitable means of escape in event of fire, specifically if they do have to travel excessive distances.
- Ensuring any changes impacting the exterior of any premises e.g. temporary structures or queuing systems, do not obstruct means of escape or compromise assembly points. If the existing means of escape or assembly point is compromised, alternative suitable arrangements should be in place in accordance with the revised fire risk assessment. If unsure, seek advice from your competent fire risk assessor.
- Where external access is altered, changing car parking areas into queuing zones for example, this must not compromise access for firefighting appliances or interfere with firefighting activities.
- Ensuring means of escape are easily available as they may not have been used for some time or where an escape route is shared, and other premises remain closed.
- Reviewing measures implemented to increase security/reduce the risk of arson whilst the premises have not been used, as these may have adversely affected fire safety measures.
- Reviewing storage and stock levels e.g. the amount and positioning of stock.
- Where fire safety measures have not been maintained e.g. automatic fire alarm and detection systems or automatic fire suppression systems and have not received their routine servicing or testing.

4. Evacuation arrangements and safety drills

4.1. The practising of evacuation procedures for fire is an integral part of managing fire safety and ensuring that the required procedures in event of fire / emergency are suitable. Not only do they establish suitability and effectiveness, but they also highlight any deficiencies that need to be addressed to ensure all are aware of what to do in an emergency and any specific responsibilities that any individual(s) may have, with further practice confirming the issues have been addressed, if required.

4.2. The Responsible Person should ensure there are suitable and sufficient emergency procedures which should be reviewed in relation to any changes emerging from enacting any specific COVID-19 procedures. These are specific to a premises and should assess the balance between the risk from fire and risk from COVID-19 whilst maintaining suitable fire safety measures in event of fire, accounting for all occupants and especially those that require assistance to evacuate and where a personal emergency evacuation plan (PEEP) is required.

4.3. It is essential all occupants leave a premises in event of fire (specific evacuation strategies not withstanding) to ensure their safety and go to the pre-determined Assembly Point. Whilst social distancing may be impacted during evacuation, the duration of any impact is minimal and the need to evacuate from a potential fire represents a higher priority. Appropriate distancing can still be managed and by following government guidelines on maintaining hygiene at the Assembly Point.

4.4.   The practising of emergency procedures can take multiple forms from full evacuation, partial / targeted evacuation, desktop exercises etc., or a combination of methods to assess suitability depending on the premises and occupants. In all instances these should be recorded in the premises fire risk assessment.

5. Fire doors

5.1.   Fire doors are an integral part of the fire safety measures which assist in providing a protected means of escape in event of fire, especially in premises where people sleep, and fire doors should not be wedged open. Fire doors can only be held open by automatic releasing hold-open devices in conjunction with a comprehensive automatic fire detection and alarm system specifically designed and installed for this purpose.

6. Information to students / residents

6.1.   It is essential all students / residents and others in the premises are kept fully informed of the current procedures to be taken in event of fire and what is expected of them, this should be provided as soon as it has been reviewed / updated. Information should be provided in a format that all can understand, ideally with validation it has been understood, and everyone should have access to the information should they need to familiarise themselves with it.

6.2.   Information may include (not exhaustive):

- The procedures to be taken on discovery of fire.
- The procedures to be taken in event of fire / alarm sounding.
- Expectations and practices e.g. not placing items in corridors / means of escape.

7. Training

7.1.   If staff training and training for others who have responsibilities in event of fire, has not been undertaken for some time or new staff have started or fire safety measures have been reviewed / updated, then they should be provided with appropriate fire safety training.

7.2.   It is important all staff and those with responsibilities in event of fire receive fire safety training relevant to their role and responsibilities. The Responsible Person should review the current level of training against each individual and update where required, this is essential for any occupants who may not be familiar with your premises.

7.3.   Training may include (not exhaustive):

- Actions to be taken on discovery of fire.
- Actions to be taken in event of fire.
- The use of fire extinguishers.
- The use of evacuation aids to assist those who require assistance to evacuate.
- Liaison with emergency services.

8. Testing and maintenance

8.1. It is imperative students and those residing / working in student accommodation are kept safe, regardless of the requirements of the current national lockdown measures. With no relaxation of fire safety legislation, it is the responsibility of the Responsible Person and / or duty holder to ensure they are testing and maintaining all fire safety measures to maintain a safe premises.

8.2. The Government's view is that workers in the fire safety industry provide vital support to critical functions and should be considered key workers within the provisions of HM Government guidelines. This means any impact from lockdown restrictions should be limited.

8.3. Fire safety systems requiring testing and maintenance may include (not exhaustive):

- Fire detection and alarm systems.
- Emergency escape lighting.
- Fire extinguishers.
- Smoke control systems e.g. automatic opening vents, fans etc.
- Automatic fire suppression systems e.g. sprinklers.
- Measures provided for the FRS e.g. firefighting lifts, dry risers, access for fire appliances.

8.4. It is essential that where fire safety industry workers attend premises to undertake activity, they work within a COVID Secure environment within the requirements of the national lockdown measures. This is a responsibility of both the Responsible Person and the worker in question.