



# **Guidance for Fire Safety in Tourist Accommodation**

## **Introduction**

The purpose of this guidance is to provide in simple terms an understanding of what the fire safety requirements are in different types of tourist accommodation. The standards within this guidance are either requirements under the Fire Precautions Act 1975 or an agreed standard between the Fire Safety Department (FSD) and the Department for Enterprise (DfE).

## **Definitions**

Under the Tourist Act 1975 there are different definitions of uses for tourist accommodation, and depending on the type, the fire safety requirements will differ. However, whatever standard is asked for the purpose is always the same; to safe guard the life of the occupants by minimising the risk of fire, and in the worst-case scenario, provide a safe and protected way out. Different uses currently outlined by the DfE legislation are:

1. Any premises used for the lodging for reward of tourists or visitors
2. Residential hotels
3. Holiday hotels
4. Private hotels
5. Tourist inns
6. Motor inns
7. Road houses

8. Guest houses
9. Boarding houses
10. Lodging houses
11. Flats, flatlets or other rented accommodation used or intended to be used for accommodating tourists
12. Holiday hostels
13. Holiday camps
14. Holiday villages
15. Camping sites
16. Caravan sites

### **Hotels & Boarding Houses (Hotel & Boarding House Order 1997)**

The Fire Precautions Act 1975 (FP Act 1975) encompasses various different types of properties. Each different type has a Designating Order in place which simply means that a Fire Certificate is required.

The "Hotel & Boarding House Order 1997" covers the two tourist uses which require a Fire Certificate. The Fire Certificate is made up of several sections including:

- The Fire Certificate – This is a page which outlines the use to which the premises is being put, i.e. a Hotel or a Boarding House. This page will need to be displayed in a public area.
- A section which defines the "Occupier". This is important as the Occupier is taking responsibility for the Fire Certificate and the fire safety within the premises. It is important that the Occupier understands this, as it will sit with them to resolve any problems, and also to ensure that the fire safety standards are maintained to a high standard. Contraventions of the FP Act 1975 can result in a substantial fine or possibly a jail sentence, which is obviously something that no one wants. ***The Fire Safety Department is here to help you*** and hopefully resolve any problems long before they get to a legal stage.
- Schedule 2 of the Fire Certificate outlines your responsibilities, so look on this section as a manual to manage your fire safety. It will outline what is expected of you as the Occupier. This is also the part of the Fire Certificate where maximum numbers are set for areas such as bars and function rooms.

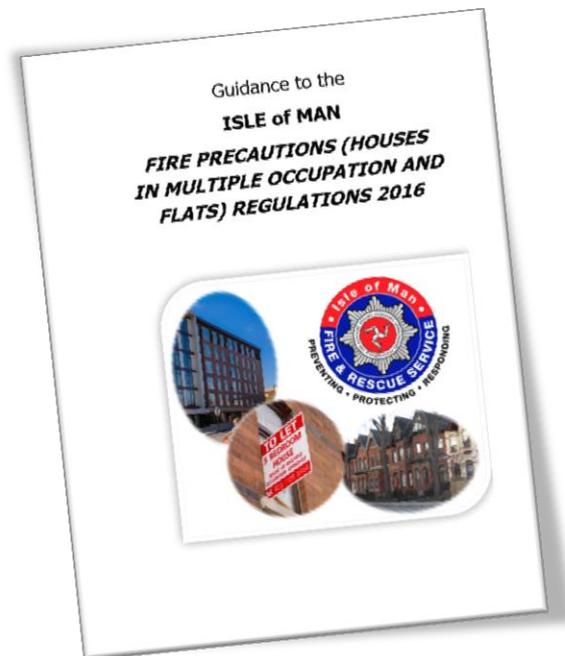


The process of applying for a Fire Certificate is straight forward. You can either download an application form from our website ***iomfire.com*** or call into the FSD and ask for an application form. Once your application is submitted a Fire Safety Officer will be in touch and will help guide you through the rest of the process. As the FP Act 1975 is prescriptive legislation, an Officer will attend your premises to carry out an inspection and tell you what steps are required to comply.

## **Flats**

The FP Act 1975 gives the powers for the Fire Authority to make Regulations, and one set of Regulations relate to the use of Flats, namely ***The Houses in Multiple Occupation & Flats Regulations 2016*** (HMO & Flat Regulations).

For accommodation which falls within the scope of these Regulations, a letter of compliance is issued by the FSD following an inspection. This compliance letter will be required prior to registration by DfE. This must include the compliance of the entire property which contains the flat to be registered. There are a separate set of guidance for Flats and HMO's, once again available on our website ***iomfire.com***.



## **Fire Risk Assessments**

In the UK the Regulatory Reform (Fire Safety) Order 2005 (FSO) has made it mandatory that places of work must carry out a Fire Risk Assessment (FRA). This is reflected in the Isle of Man under the H&S Management Regulations 2003. A format for a FRA for tourist accommodation has been agreed between the FSD & DfE.

The purpose of the FRA is to identify the key measures needed to safeguard the safety of employees, guests and other persons who may be affected in case of fire.

The assessment identifies potential fire hazards and risks as well as activities that may cause fires at the property. It also includes details on evacuation procedures and firefighting equipment. It is suitable for **all types of tourism provider**. The assessment should be undertaken by the owner or employer in most cases.

The requirement to carry out a Fire Risk Assessment comes under the H&S Management Regulations 2003. Isle of Man Tourism requires all new tourism providers to complete a Fire

Risk Assessment upon registration with the Department. It is encouraged for a Fire Risk Assessment to be completed on a regular basis to ensure visitor safety. A copy of the FRA can be downloaded at <https://www.visitisleofman.com/dbimgs/Accommodation-Fire-risk-assessment.pdf>



***The 5 steps to carry out a risk assessment***

**Tourist uses which fall outside the Fire Precautions Act 1975**

For properties which fall outside the scope of the FP Act 1975 the FSD offer good will advice at the request of the DfE. A property may not be registered with DfE if the advice is not acted upon or agreed. For example, if escape in case of fire cannot be achieved without passing through habitable rooms, or escape is via a window and not a door then the Fire and Rescue Service will recommend to DfE that the property should not be registered until a satisfactory alternative has been agreed.

**The areas of Fire Safety that will be considered are;**

**Internal layout**

Every person using the proposed property should be able to safely walk away from any fire situation. This will include the safe evacuation to a place of safety away from the property. Evacuation will need to be possible without the need to pass through habitable rooms, or escape through windows or have to use ladders. If this is not possible, early consultation should take place with the Fire Safety Department to discuss viable options such as alternative escapes options, for example external stairs or the provision of a domestic fire sprinkler suppression system.

The level of fire safety will depend on a number of different factors. Listed below are some of those factors which would increase the level of risk and therefore the level of fire safety requirements:

- Sleeping more than 6 guests **(Fire Certificate may be required)**
- If anyone is sleeping above the 1st floor **(Fire Certificate may be required)**
- If anyone is sleeping below the ground floor **(Fire Certificate may be required)**
- A convoluted or unusual layout
- The location of the property (i.e. if it is remote or the water supplies are poor)
- The design of the building and the level of separation or compartment. The general level of fire resistance of a compartment required by the FSD is a minimum of 30 minutes. In certain instances, the Building Control Authority can ask for 60 minutes. Before undertaking any works you should consult your local Building Authority as planning permission may also be required.

Sleeping accommodation should be separated from other habitable rooms, especially kitchens, by a minimum of 30 minutes fire resistance. Where this can't be achieved there may well be alternative solutions which may be agreeable with the Fire Safety Department.

### **Warning in case of Fire**

It is essential that occupants have the earliest possible warning in case of fire. Dependant on the property design, and the layout, adequate fire detection will be required to ensure a fire is detected in its early stages and occupants can evacuate safely. The use of hardwired interlinked domestic detection may be suitable in most cases, but we would always strongly advise that you contact the FSD prior to any works being carried out to ensure that the proposed system is adequate in regards to the risk.



***As a minimum standard in properties being used on a regular basis as tourist accommodation the detection should be hardwired into the properties' mains and interlinked where there is more than one detector. This work should be undertaken by a suitably qualified person. Detectors can be linked physically by wires or wirelessly (Wi-Fi, bluetooth etc).***

## Emergency Lighting

Emergency lighting ensures that escape routes from properties are useable in darkness if the main power has failed or been involved in fire.



### *Conventional emergency lighting*



***There are products on the market which are conventional lighting units with emergency lighting incorporated into them. Regardless of the type of lighting it must meet with the relevant standards to be accepted.***

#### IN CASE OF FIRE

- 1 **If you discover a fire**
  - (1) If you discover a fire, sound the alarm and call 999 for the Fire & Rescue Service.
  - (2) Leave your accommodation promptly along with any guests, closing your doors, but not locking them, as you leave.
  - (3) Report to the assembly point at – *[specify location]*
  - (4) Account for other residents if possible.
  - (5) Wait for the Fire & Rescue Service to arrive and tell them any information that you feel may be useful (for example; the location of the fire, any persons unaccounted for).
- 2 **If you hear the fire alarm**
  - (1) Unless a pre-arranged test, treat all fire alarms as an indication of fire in the building.
  - (2) On hearing the alarm, leave your accommodation promptly along with any guests, closing your doors, but not locking them, as you leave.
  - (3) Report to the assembly point at – *[specify location]*
  - (4) DO NOT run.
  - (5) DO NOT stop to collect your belongings.
  - (6) DO NOT use the lifts (if your building has one).
  - (7) DO NOT enter the building again until authorised by a Fire Officer.

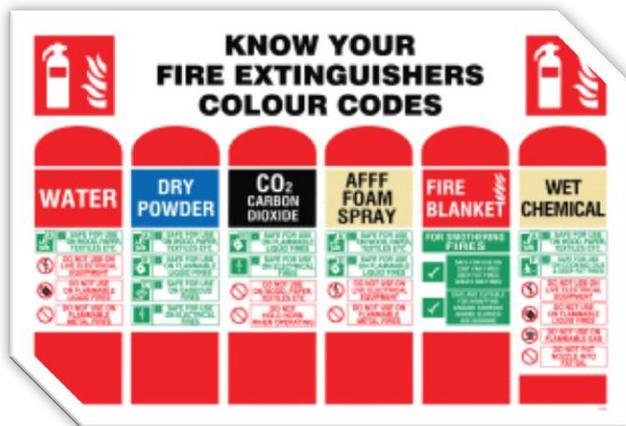
### Signs and notices

There should be suitable and sufficient signs and notices telling occupiers what to do in case of fire. Information should include all relevant points to ensure a safe evacuation such as closing doors at night and directions to properties particularly in rural or remote locations. For example, a postcode, fixed line telephone number, and directions should be available to pass to the Emergency Services Joint Control Room should they be required. Once again if you are unsure please contact the FSD for more advice.

***Examples of what to do if you discover a fire or hear the fire alarm operating***

## Fire Fighting Equipment

The priority in case of fire should be to safely evacuate all persons from the property, close the door to the fire if safe to do so and then call the Fire Service. Do not re-enter the property until safe to do so as instructed by the Fire Service. People who have not had accredited training in the use of portable firefighting equipment should not use them in case of fire. However it is advised that suitable portable firefighting equipment should be available in case of fire such as a fire blanket in the kitchen. Once again we would advise that you contact the FSD for advice if you have any queries regarding the type of extinguishers required. Although the FSD no longer offer training in regards to extinguishers, other local organisations do.



## Fire Doors

Fire doors may not always be necessary in all tourist uses; that determination would be made on an individual basis. However if a Fire Certificate is required then the standards would also require fire doors to be fitted. Fire doors play an integral part in the protection of escape routes and the compartmenting of buildings. Consequently it is important that your fire doors are maintained correctly.

The term FD30 or FD30S are terms commonly used within fire safety to describe a fire resistant door. The letters "FD" simply mean Fire Door. The number relates to the time the door is designed to resist fire, 30 equates to a minimum of 30 minutes. All fire doors should have an intumescent strip in either the door or frame. The "S" relates to a cold smoke seal being incorporated within the intumescent seal.

If you are installing a new fire door, you should aim to install a complete door assembly which comprises of doorframe, door leaf, other panels, hardware, seals and any glazing, so that when the door is closed it is intended to resist the passage of fire and smoke in accordance with specified performance criteria. A fire door in essence equals a complete installed assembly.

If you have existing fire doors, providing they are fitted correctly and close fully into their rebate, they may well be acceptable. Once again, contact the Fire Safety Department for further advice or a visit.

## ***Intumescent Seals***

It is generally accepted that the weak point of any fire door is around its edges. This issue has been addressed by the incorporation of an intumescent seal. An intumescent seal can be around either the fire door or in the frame. The seal is affected by heat and will expand when subjected to a fire. There are two different types of seals as shown in the following two diagrams. If you have doors which have a historical value or form part of a protected building once again contact the FSD for advice.

*Intumescent Seal (a)*



*Intumescent strip with a cold smoke seal (b)*



### **Intumescent Seal (a) Intumescent strip with a cold smoke seal (b)**

The purpose of a cold smoke seal, as its names suggests, is to hold back the smoke in the early stages of a fire. Most fire fatalities are caused by the smoke and not the fire itself.

## **Developing Technology**

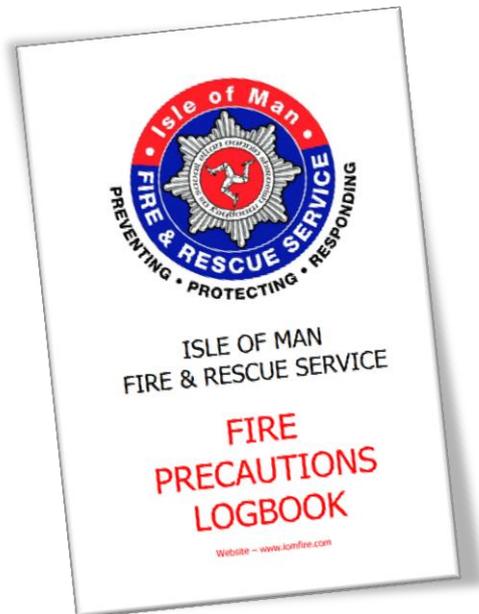
We only have to look at our smart phones and televisions to see how quickly technology moves forward. This is also true of the Fire Industry. For example, you can remotely be informed by your smart phone if the detection in your home is operating, and also have a visual link via a Wi-Fi camera. There are various solutions offered in this guidance to fire safety concerns and with the advancement of technology there may well be some

additional solutions moving forward. Whilst we cannot promise that we would accept an alternative solution, we will look at any solution you bring to us.



## Testing and maintenance

Any systems which have been installed for fire safety purposes must be tested and maintained in accordance with the relevant standards to which they were installed. The results of the tests, and any works on the systems should be recorded in a Fire Precautions Log Book which can be downloaded from [iomfire.com](http://iomfire.com).



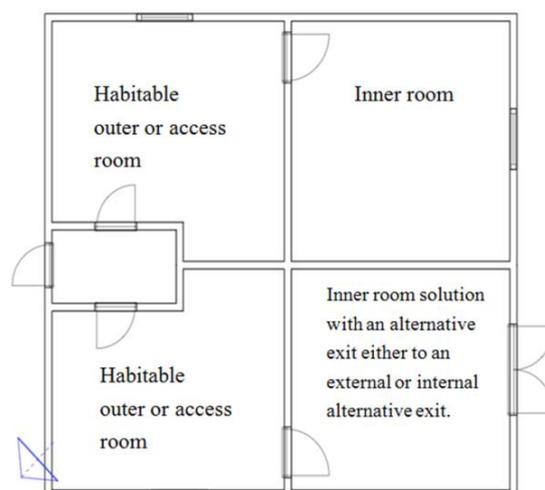
Systems such as domestic sprinkler installations which have been fitted as an alternative to a satisfactory internal layout must be serviced in accordance with the relevant standards to ensure that they will operate in the event of a fire. You will be provided with copies of service certificates, which you should forward to DfE. If you fail to do so it may result in registration being withdrawn.

## Potential property layout issues explained

### Inner rooms

The issue with an inner room is that in the event of a fire in the outer room the occupant could find themselves trapped.

This layout shows the issue with an inner room (upper most rooms) and a solution with an alternative escape (bottom two rooms).

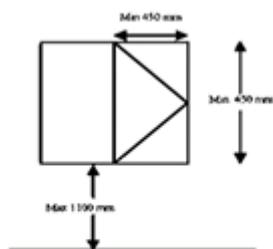


## Escape Windows

Although not accepted by the FSD, you may well have come across escape windows. This section is to explain what an escape window is and why it isn't considered as a means of escape by the FSD.

In the event of a fire when the main access/egress from a property is untenable, the only other viable option can very often be a window. An escape window is a window that an average person would be able to open and use to escape from a property. An escape window will aid the FRS when attempting a rescue from a ladder for example. Consequently and for this reason we support the general installation of escape windows in properties.

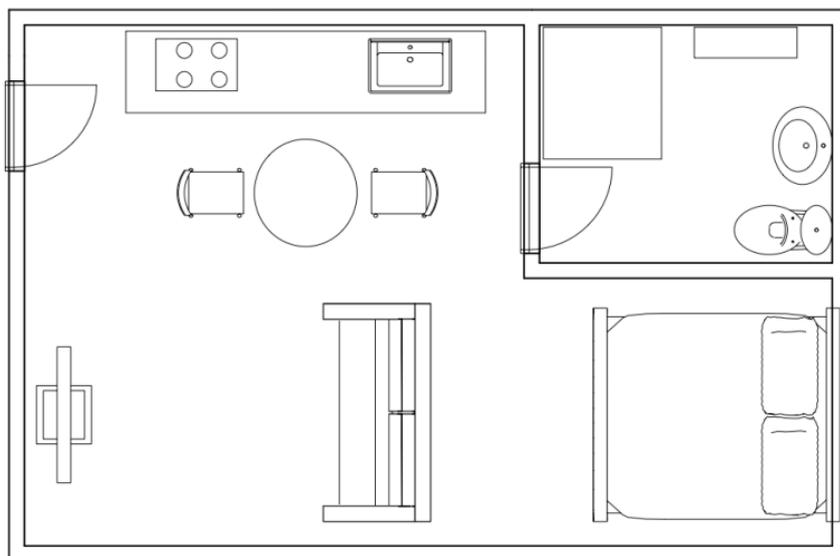
However for the purpose of general fire safety, an escape route should be easily used by anyone without assistance. An escape window on the first or second floor is not a viable escape route for the vast majority of people. Another example would be an elderly occupant on the ground floor trying to use a window as an escape route. As a consequence, an escape window cannot form part of your escape route.



An example of an escape window with its minimum requirements and minimum opening size (450mm x 450mm)

## Multiple uses in one room

We are most vulnerable to fire whilst we are sleeping. Additionally when we look at where a lot of fires start, the kitchen tends to be one such room. So combining sleeping accommodation and a kitchen in one room increases the risks to the occupants accordingly. Below is an example of multiple uses in one room.



***This picture shows a room being used as a kitchen, living room and bedroom. In this particular layout you would also have to pass the kitchen to escape which increases the risk further.***

***3 uses in one room, a kitchen, living area and sleeping accommodation***



***Note: Neither of the above layouts comply with the HMO & Flats Regulations 2016***

### **Solutions to multiple room layouts**

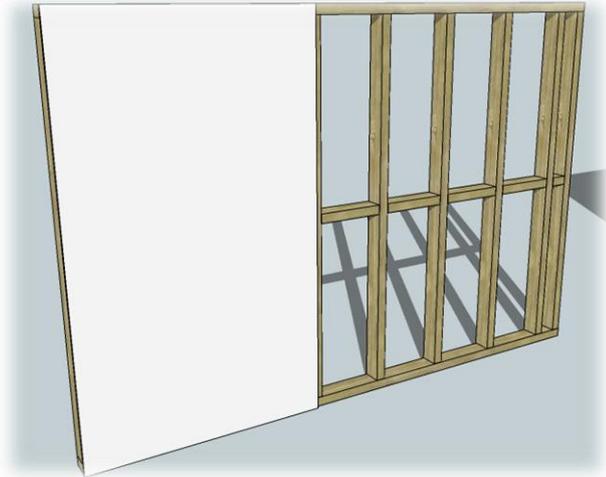
#### **Smoke Detection**

The risk can be reduced by the inclusion of smoke detection. Smoke detectors are one of the most significant fire safety measures to be introduced in recent years, but smoke detection is no guarantee that an occupant will wake and evacuate safely in the event of a fire. For example, the BBC reported in 2017 that researchers at Dundee University and Derbyshire Fire and Rescue had found that of 34 children who took part in a test to see if they responded to a smoke detector whilst asleep found that, 27 repeatedly slept through smoke detector alarms. People can fail to respond to an alarm for lots of reasons, such as being under the influence of alcohol or other substances, or in relation to medical issues.

So whilst we would always ask for smoke and/or heat detection in a given area, on its own in one room containing a kitchen and sleeping accommodation it is not enough, and additional measures have to be considered.

## Seperating the risks

A physical seperation between the kitchen and sleeping area will reduce the level of risk significantly. The seperation would have to provide a minimum of 30 minutes protection. This could be a straight forward partition wall made up of a wooden or metal frame, plasterboarded each side and skimmed with plaster.



Another solution could be a fire curtain which is usually activated by detection.

***Multiple smoke curtains deploying on the opertaion of the fire alarm system.***



***A smoke curtain fitted at the head of a staircase.***

However it is important to remember that if you do introduce an additional wall or fire curtain you don't create an inner room or impede an escape route.

## Active Fire Safety Measures

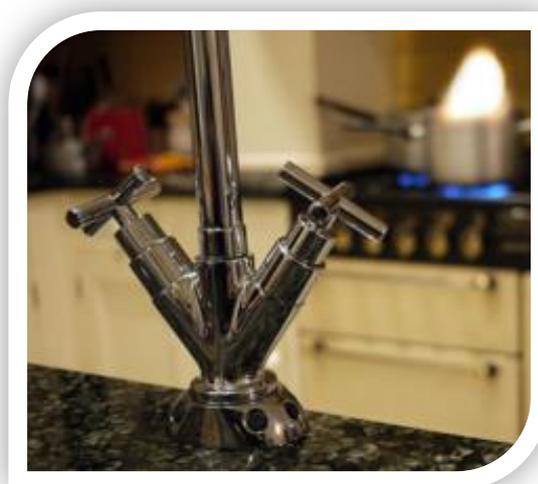
This would be an additional measure that would actively do something to either control the fire or extinguish it. This could be a sprinkler system or misting system. These systems can either be operated by a concealed glass bulb which breaks under heat, or detection which is more often found on misting systems.



*Two sprinkler heads. The one on the left is a conventional head and the one on the right is a concealed head which drops down and activates when it is effected by the heat from a fire.*



*A misting system operating from a specialist head incorporated in a kitchen sink tap.*





***A wall mounted misting head.***

### **Carbon Monoxide**

Carbon monoxide (CO) is a colourless, odourless, tasteless, poisonous gas produced by the incomplete burning of carbon-based fuels, including gas, oil, wood and coal. Carbon based fuels are usually safe to use, however, when the fuel does not burn properly, excess CO is produced, which is poisonous. When CO enters the body, it prevents the blood from bringing oxygen to cells, tissues, the brain and organs.

You cannot see it, taste it or smell it but CO can kill quickly with little warning. Around 50 people die every year from CO poisoning caused by gas, oil and solid fuel appliances and flues that have not been properly installed, maintained or that are poorly ventilated. Lower CO levels that do not kill immediately can cause serious harm to health if breathed in over a long period. In extreme cases paralysis and brain damage can be caused as a result of prolonged exposure to CO. Increasing public understanding of the risks of CO poisoning and taking sensible precautions could dramatically reduce this risk.

### **What preventative measures can I take?**

- Ensure that any work carried out in relation to gas appliances in domestic or commercial premises is to be undertaken by a Gas Safe Registered Engineer, competent in that area of work
- The HSE strongly advises that gas appliances and/or flues are installed and serviced regularly for safety by a Gas Safe Registered Engineer. If you live in tenanted accommodation, your landlord has a legal duty to carry out an annual gas safety check and maintain gas appliances. They must provide you with a copy of the completed gas safety check certificate
- If you have a wood or coal burning stove fitted, make sure it is fitted by a HETAS approved installer. Make sure your chimneys are swept twice a year
- Always make sure there is enough fresh air in the room containing your gas, oil or solid fuel appliance. If you have a chimney or a flue, ensure it is not blocked up and also ensure that vents are not covered
- Do not use appliances like paraffin heaters and cabinet heaters in your house
- Never take a BBQ into a building or tent when it is still warm. When the embers have nearly died down, the BBQ will produce very large amounts of carbon monoxide!

## Does the FRS recommend the use of carbon monoxide alarms?

The FRS strongly recommends the use of audible carbon monoxide (CO) alarms as an important precaution but they must not be regarded as a substitute for proper installation and maintenance of gas appliances by a Gas Safe Registered Engineer.

Before purchasing a CO alarm, always ensure it complies with British Standard EN 50291 and carries a British or European approval mark, such as a Kitemark. CO alarms should be installed, checked and serviced in line with the manufacturer's instructions.



**Please note:** You can be particularly at risk from CO poisoning when you are asleep, because you may not be aware of early CO symptoms until it is too late. Having an audible CO alarm could wake you and save your life.

## What are the symptoms of carbon monoxide poisoning?

Early symptoms of carbon monoxide (CO) poisoning can mimic many common ailments and may easily be confused with food poisoning, viral infections, flu or simple tiredness. Symptoms to look out for include:

- Headaches
- Breathlessness
- Nausea
- Dizziness
- Collapse
- Loss of consciousness
- Tiredness
- Drowsiness
- Vomiting
- Pains in the chest
- Stomach pains
- Erratic behaviour
- Visual problems

***The advice from the FRS & Tourism is that Carbon Monoxide detection is fitted within your property.***

## **Fire Safety in Yurts, Pods and Shepherd Huts**

There is a growing trend in the provision of specialist units being provided for tourist accommodation. Whilst this is a real positive in regards to the diversity of tourist accommodation on the island it is important to remember that they must be safe to occupy. Below are examples of the different types of units and uses which will vary in both design and layout.



***A typical yurt***

### ***Examples of Pods***





*Examples of Shepherd's huts*



Whilst fire safety advice will generally vary depending on the degree of risk, there are some general fire safety requirements which will apply to all types of uses.

1. Fit a smoke detector\* within the unit. The detector type should be one that will minimise any false alarm activations; this will generally be an optical smoke detector as opposed to an ionising smoke detector. Your smoke detector will come with information indicating what method it uses to detect products of combustion.
2. The areas in which the accommodation sits should be well lit and torches should be provided and kept in a prominent position within the unit.
3. Procedures for raising the alarm should be displayed in a prominent position. They should include the address of the accommodation including the post code as visitors may well struggle to direct the emergency services to the location. You should consider the provision of procedures in different languages to reflect the occupation.
4. The advice that should be given to occupants is to evacuate the units and dial 999, and not to tackle a fire themselves.

**\*Dependant on the size of the accommodation it may be difficult to fit detection which does not cause continual false alarms. This therefore can increase the risk to the occupants significantly and alternative ways of reducing the risk would need to be found.**

### **Multiple uses in one room**

The issues of multiple uses in one room covered earlier in this guidance apply here as well and can be more problematic when it comes to a workable solution. Where any of the solutions highlighted on page 9 of this guidance can be applied, then to minimise the risk they should be.

## Kitchen areas

- a. Where possible kitchens should not be included within these units. Don't forget you would not cook inside a tent, but rather a camp fire or area outside. The same rules can be applied in this case. Other possible solutions are:
  - i. To have a separate unit or area fitted with a kitchen that can be used for cooking but is separate to the unit being used as sleeping accommodation.
  - ii. Kitchen facilities are moved outside the unit into a covered area to protect from the elements. They should however not affect the means of escape from the unit.
  - iii. Cooking facilities are provided by the operator of the site potentially in the main building associated with the units.
  
- b. Where a kitchen is fitted:
  - i. It should be fitted professionally by the unit provider.
  - ii. You **must not** have to pass the kitchen in order to evacuate the unit from the area used as sleeping accommodation.
  - iii. The unit should be ventilated to prevent a build-up of cooking fumes or other gases.
  - iv. The facilities for cooking should be minimal, i.e. a single hob unit.
  - v. The occupants should be instructed on its use and it made clear to them that it should not be put to any other use, i.e. drying clothes. **Facilities should be provided for drying clothes elsewhere.**
  - vi. **The above appliances should be serviced on a regular basis, and in line with the manufacturer's recommendations.**

## Wood Burning Stoves

Wherever possible wood burning stoves or similar **should not** be fitted within these units. Enclosed electric or specifically designed gas powered heaters are a much safer option.

If a wood burning stove is fitted:

- It must be fully compliant with the requirements of Part J of the Building Regulations
- It must fully comply with the conditions outlined in the relevant standards and fitted professionally by a competent person. If this is not the manufacturer of the unit, clarification must be sort from them that their unit is suitable for such a heater to be fitted
- A smoke detector **must** be fitted within the unit
- It must be signed off by the relevant department (DEFA)
- It must be adequately ventilated to avoid the build-up of fumes including Carbon Monoxide
- A Carbon Monoxide detector **must** be fitted within the unit

- It must not be used for any other purpose other than heating (not cooking or drying clothes)
- You **must not** have to pass the stove in order to evacuate the unit from the area being used as sleeping accommodation

**Regardless of the use it is important to always consult the Planning Department as you will most likely require Planning and Building Control permission.**

### **Other general points to note:**

Properties which receive a Completion Certificate as a domestic dwelling from The Department of Environment, Food and Agriculture may not be guaranteed registration for Tourist Accommodation with DfE. Early consultation with DfE is strongly advised prior to the commencement of any works.

Properties which comply with the HMO & Flats Regulations may not be deemed suitable as tourist accommodation; it is recommended that you should consult with both the FSD and DfE prior to the commencement of an application.

### **Summary**

The points covered in this guidance are not an exhaustive list and additional measures may be necessary prior to registration. The main advice is early consultation prior to any works to ensure what is planned is satisfactory. Late consultation may result in major works and non-registration with DfE following advice from the FSD.

### **Contacts**

#### **Department for Enterprise**

Tourism Business Development Team 686870 [tourismquality@gov.im](mailto:tourismquality@gov.im)

#### **Isle of Man Fire and Rescue Service Fire Safety Department**

647303 or email [iomfire@gov.im](mailto:iomfire@gov.im)

#### **Department of Environment, Food and Agriculture Planning and Building Control**

General enquiries 685902 or email [buildingcontrol@gov.im](mailto:buildingcontrol@gov.im)

### **Important Note**

***This guidance is generally in relation to fire safety. There are other regulations and legislation with which you may need to comply before developing or operating tourist accommodation such as Planning, the Building Regulations, Environmental Health and Tourism and you are strongly advised to consult these parts of Government before proceeding too far. Contact details are provided below.***

***Planning and Building Control Directorate, Department of Environment, Food and Agriculture, Murray House, Mount Havelock, Douglas IM1 2SF: telephone 685950 or e-mail [northplanning@gov.im](mailto:northplanning@gov.im) or [southplanning@gov.im](mailto:southplanning@gov.im) depending on the location of the site.***