



## Department for Education consultation on Fire Safety Design for Schools – Building Bulletin (BB) 100 Revised

### Response from the Association of British Insurers

The ABI is the voice of insurance, representing the general insurance, protection, investment and long-term savings industry. It was formed in 1985 to represent the whole of the industry and today has over 300 members, accounting for some 90% of premiums in the UK.

The ABI's role is to:

- Be the voice of the UK insurance industry, leading debate and speaking up for insurers.
- Represent the UK insurance industry to government, regulators and policy makers in the UK, EU and internationally, driving effective public policy and regulation.
- Advocate high standards of customer service within the industry and provide useful information to the public about insurance.
- Promote the benefits of insurance to the government, regulators, policy makers and the public.

This is the ABI's response to the Department for Education's consultation on revision to Building Bulletin 100 – Fire Safety Design for Schools.

### Executive Summary

In order to effectively protect new build schools from fire, the ABI recommends that the Government consider the following:

#### *Review of BB 100*

- Re-evaluate the suggested weakening of the expectation of installing risk mitigation measures such as sprinklers in new build schools to protect lives and reduce property damage.
- Improve the protection of schools from fire risk, by mandating the installation of sprinklers in all new build schools.

#### *Data on school fires*

- Publish up to date and robust statistical data on school fires in the UK, including the number of schools that have been protected by sprinklers controlling a fire, the reduction in damage of schools buildings protected by sprinklers, and the indirect costs associated with the continued use of the school building.

#### *Benefits of fire risk mitigation*

- Issue clear advice on the benefits of risk mitigation measures such as sprinklers, and clear guidance on protection against deliberate fire setting.

## **Review of BB 100**

The ABI welcomes the Department for Education's Consultation on the review of BB 100 and the opportunity to comment. The ABI and our members have serious concerns over what appears to be a weakening of advice on the installation of automatic fire sprinklers in new build schools. We believe that this will significantly reduce the number of schools installing vital risk mitigation measures and potentially means an increase in the number of fires in school buildings, putting at greater risk the safety of pupils and staff. It potentially also means an increase in the level of significant property damage to schools, leading to adverse economic and social impacts on local communities.

Automatic fire sprinklers in school buildings significantly mitigate the threat of fire to death, injury and property damage. The ABI strongly believes there is no justification or compelling evidence to support weakening the existing guidance on installing fire sprinkler systems in all new build schools. To do so directly contradicts the very intention of BB 100 i.e. to advise how to design school buildings so that they satisfy Building Regulation Approved Document B and are adequately protected from the risk of fire.

The intention of reviewing BB 100 was to update out of date content, as well as to shorten and simplify the document, and that this was to be completed without diminishing or compromising the overriding importance of ensuring the safety of pupils, staff and visitors if a fire occurs in a school. The ABI does not feel that the suggested changes from the 2007 document meet this objective. In our submission, the revised document should not be published in its current state as it undermines adequate protection from fire. Rather than weakening current guidance and disguising this as simplification of the document, Government should be making changes to improve the protection of schools, and those who work or are educated within them, from fire by mandating the installation of sprinklers in all new build schools.

The 2007 guidance clearly acknowledges the importance of sprinklers and expressly makes this a significant expectation for all new school buildings. This expectation was strongly supported by the ABI and its members, along with various other stakeholders with detailed understanding of fire protection, all of whom continue to recognise the substantial benefit that these risk mitigation measures can bring. We have not been made aware of any reason or justification for the removal of this expectation and the decision process that sits behind this change.

### **The impact of school fires**

School fires, in particular arson, can have a devastating impact on both a school and the community it is a part of. The 'Impact of school fires' by the National Foundation for Educational Research (NFER) <sup>1</sup> highlights the direct and indirect costs associated with school fires, including economic but also educational, social, and emotional effects to the local community. The destruction of property results in not only a financial impact on the school and the Local Education Authority, but disruption of education, loss of coursework, loss of teaching aids, disruption of staff jobs and loss of facilities or resources in the community. An ABI member, Zurich Municipal, estimates that school fires disrupt the

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<sup>1</sup> <https://www.nfer.ac.uk/publications/LFW01/LFW01.pdf>

education of up to 90,000 pupils per year. This clearly emphasises the value of effective measures that protect schools against fire.

### **Data on school fires**

According to Local Government Association figures, 'on average, each year in the UK there are over 1,500 fires in schools and other educational establishments'<sup>2</sup>. DCLG estimates the average cost of school fires between 2000 and 2004 was £58 million per year. Central Government appears reluctant to release more up to date figures in the public domain, despite our understanding that this information is received from local fire authorities and was clearly available up until 2004. Although Government statistics suggest that the number of school fires has decreased in recent years, removing the expectation of installing risk mitigation measures such as for sprinklers in new build schools, may only cause these figures to increase in the coming years, putting both lives, property, and the future generation's education at risk unnecessarily. The ABI would encourage Government to publish up-to-date and robust statistical data on school fires in the UK. The data currently available does not reference the benefits that sprinklers can provide, such as how many school fires have been controlled by fire sprinklers, the reduction in damage of school buildings that have been protected by sprinklers when a fire has occurred, as well as the provision to continue using the building.

The Fire Protection Association (FPA) collates large loss statistics on behalf of UK insurers, (clearly not all schools are insured, but the statistics give an indication of trend). Between 2009 and 2014, the 119 large loss school fires recorded by FPA cost in excess of £150 million with an average cost of £1.3 million. More worrying is that the average cost is increasing, in 2009 it was approximately £330,000 but in 2014 it was £2.8 million; the impact of these fires is clearly becoming more costly and devastating. Given the increasing impact of large loss school fires in recent years, it is counter-intuitive and completely illogical for the Government to take any steps that would further weaken guidance on risk mitigation measures in schools.

### **The benefit of sprinklers**

Sprinklers help to enable the quick and safe evacuation of those affected, limit any damage to a localised area and control the fire, enabling the fire and rescue services to extinguish it. This means that the likelihood of a total loss of property and school resources is low, and therefore will mean that there is significantly less impact on the community utilising the school facilities. According to the National Fire Sprinkler Network, between 2010 and 2015 17 schools have benefited from having sprinklers which have reduced property damage, enabling the fire service to extinguish the fire with little disruption to the education of those attending the school. Sprinklers undoubtedly reduce the damage that can be caused to a property on fire, and reduce the risk to life and therefore should be a mandatory requirement to all new build schools.

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<sup>2</sup> [http://www.local.gov.uk/web/guest/fire-and-rescue-services/-/journal\\_content/56/10180/3794888/ARTICLE](http://www.local.gov.uk/web/guest/fire-and-rescue-services/-/journal_content/56/10180/3794888/ARTICLE)

## **Arson prevention**

Arson continues to be a significant issue in schools, with approximately 40% of major school fires being deliberately set<sup>3</sup>. 20 schools a week suffer an arson attack in the UK, with a third of these occurring during normal school hours.<sup>4</sup> This clearly highlights how arson continues to be a major issue in relation to school fires, yet the updated guidance in BB 100 again has weakened advice on building in the appropriate mitigation measures to reduce the damage to both life and property, which may be caused by arson. The insurance industry provides clear guidance and advice for the design of schools, and security measures that those responsible can take to reduce the risk of arson setting on school premises. Clear advice on arson prevention should be included within BB 100 to look to target and reduce the significant issue of deliberately set fires in schools.

## **Insured losses from sprinklered buildings**

Managing the risks associated with fire in schools is the best way of making them more appealing for insurers to provide cover at an affordable rate. Cross-sector improvement would also increase confidence within the insurance industry that the right steps are being taken to reduce and effectively manage potentially costly risks.

Insured losses from sprinklered buildings are estimated to be approximately one tenth of those in unprotected buildings. The fitting of sprinklers in new school designs would cost approximately 1-2% of the total construction cost<sup>5</sup>. However, the benefit of installation can be seen through both insurance premiums (where costs can be recovered in 7-10 years<sup>6</sup>)

## **Increasing the cost to the public purse**

School buildings are largely funded by the taxpayer, with, in most cases, the Government owning the property. Total capital spending by the Department of Education was expected to be £4.6 billion in 2015-16. The recent increase in the number of new Academy schools, which are directly funded by the Department of Education (DfE), means that the Government has even more of a vested interest in managing fire risk within the school setting. The DfE's Risk Protection Arrangements (RPA) mean that the Government, and ultimately the taxpayer, will bear the cost of damage to many academy schools. Schools that have opted in to the RPA no longer purchase insurance cover in the commercial market and in the event of a costly fire, they will claim directly from Government funds for the damage under the terms of these arrangements.

As described in the RPA's procedures, the reinstatement value of the property will be covered by the public purse including *'loss or damage to buildings, contents, computers and stock owned by or the*

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<sup>3</sup> Fire Protection Association large loss statistics

<sup>4</sup> <http://www.stoparsonuk.org/viewPage/?pageId=9>

<sup>5</sup> CFOA Business Case for Sprinklers 2013

<sup>6</sup> <http://www.cheshirefire.gov.uk/Assets/business%20safety/toolkitforschools-sprinklers.pdf>

*responsibility of the academy*'. The guidance states that schools *'shall maintain a minimum standard of Risk Management which include taking all reasonable precautions for the safety of property; and taking all reasonable precautions to prevent loss, destruction, damages; and 'setting and maintaining systems for the protection of property'*. Not only does the RPA guidance seem at odds with the direction the Government is suggesting in its draft revision of BB 100, it also means that the implications of weaker guidance will, in many cases, impact on Government funds and, ultimately the taxpayer. A significant number of costly school fires in academy schools could ultimately undermine the viability of the RPA as a sustainable model for reimbursing the costs of damage.

## **Conclusion**

The draft revised version of BB 100 has downgraded the importance of property protection and fails to recognise the significant impacts that fires in schools have on the local community and disruption to children's education. There is a lack of data and evidence from Government to explain the reasoning for the proposed weakening of existing guidance on installing fire sprinklers in all new schools, which is why the ABI is calling on Government to mandate the installation of fire sprinklers in all new schools. It is clearly evident from the information and data available that the installation of risk mitigation measures such as fire sprinklers in schools improves the life safety of the pupils, staff and visitors, reduces the amount of damage done to the property and school resources, enables schools to be back up and running following a fire much more quickly, and will reduce the cost, both economically and socially, to the public.

**ABI, August 2016**