

Making your holiday caravan park accommodation safe from fire



A Guide to compliance with Fire Safety Law for those responsible for safety in holiday caravans

Contents

Foreword

1. Introduction
2. Scope of this Guide
3. Responsibilities
4. Fire risk assessment
5. Fire hazards
6. Fire protection measures
7. Examples of common caravan layouts and recommendations on fire protection measures
8. Generic fire risk assessment template for caravans
9. Typical checklist for routine checking, testing and maintenance
10. Further information

Foreword

Information about this Guide

This Guide is published by the Resort Leisure Safety Group, which comprises the following holiday park operators:

- Away Resorts Limited
- Butlins Skyline Limited
- Cove UK
- Haven Leisure Limited
- Parkdean Resorts UK Limited

The Guide was drafted for this Group by C.S. Todd & Associates Ltd and has been published after engagement with key stakeholders in the holiday park and fire sectors, the latter including the National Fire Chiefs Council (NFCC), the Scottish Fire and Rescue Service and Scottish Government.

The Guide is based on government guidance in England on fire safety for those responsible for safety in small paying-guest-accommodation¹, but comprises bespoke guidance more specifically for holiday caravan accommodation on commercially operated holiday parks.

For the purposes of this guidance, “caravan” has the meaning as set out in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968 (as may be amended from time to time). In summary, a caravan is any structure designed or adapted for human habitation which is capable of being - transported on a motor vehicle or trailer by design and includes twin-units and lodges which meet the criteria as set out in the legislation. For the avoidance of doubt, this guidance does not apply to touring caravans, motorhomes and tents.

Status of this Guide

This Guide is intended to support the application of the Regulatory Reform (Fire Safety) Order 2005 (as amended) (in England and Wales) and the Fire (Scotland) Act 2005 (as amended) (in Scotland). It has been produced with the support and encouragement of the Home Office².

¹ A Guide to making your small paying-guest-accommodation safe from fire. Home Office. 2024.

² From 1 April 2025, responsibility for fire safety policy, legislation and guidance has been transferred from the Home Office to the Ministry for Housing, Communities and Local Government.

In England and Wales, this Guide is intended to assist “responsible persons” to satisfy their duties under fire safety legislation. Equally, it is intended that the Guide should assist “dutyholders” to comply with relevant legislation for caravans (as relevant premises) in Scotland.

It is not intended that the technical aspects of this Guide need necessarily be prescriptively applied in all caravans to which the Guide applies. The Guide provides recommendations and practical examples of potential precautions that may assist you in satisfying the requirements of fire safety legislation in your holiday park caravans. However, there is a legal requirement to undertake an appropriate fire risk assessment, which will determine the exact precautions that need to be taken in the caravans at your holiday park³.

Some caravans might have features that necessitate fire precautions that are not covered by this Guide. It is your responsibility to ensure that you are compliant with the requirements of fire safety legislation and to seek independent professional advice if necessary.

Attention is drawn to BS EN 1647, which provides a minimum specification for the design and construction of holiday caravans.

Acknowledgements

The assistance of the following in the production of this guidance is gratefully acknowledged:

- Members of the Resort Leisure Safety Group.
- Kevin Parsons of Know Fire Ltd.
- C.S. Todd & Associates Ltd.
- National Fire Chiefs Council (NFCC).
- Scottish Fire and Rescue Service.
- Scottish Government Fire and Rescue Unit.

Photographs in this document are reproduced with the kind permission of the Resort Leisure Safety Group and should not be reproduced without permission.

³ Caravans used permanently as private dwellings do not need a fire risk assessment (see Section 1).

1. Introduction

This Guide has been published to provide simple and practical advice to assist persons who let out holiday caravans on holiday parks to comply with fire safety legislation and make their caravans safe from fire.

Fire safety legislation

In England and Wales, the Regulatory Reform (Fire Safety) Order 2005 (“the Fire Safety Order”) is the main legislation that regulates fire safety in all premises that provide accommodation for paying guests. In Scotland, very similar regulation is applied by the Fire (Scotland) Act 2005. In this Guide, the term “fire safety legislation” is used to apply to both the Fire Safety Order and the Fire (Scotland) Act.

This guidance applies to you if you are charging someone to stay in a holiday caravan as a guest and it is not being occupied as a permanent residence of the occupants. Caravans permanently used as private dwellings fall outside of the scope of the fire safety legislation discussed in this Guide.

Fire safety legislation imposes a general duty of fire safety care to ensure that anyone staying in your caravan is safe from fire. This includes taking steps to reduce the likelihood of a fire starting and making sure that, in the event of fire, people can evacuate to a place of safety.

In this Guide, the term “dutyholders”⁴ is used to define the person or persons responsible for complying with fire safety legislation. This is likely to be the owner or letting agents with whom there is an arrangement to let a caravan during the letting agreement.

Dutyholders are required to appoint or nominate a competent person to assist the dutyholder in compliance with fire safety legislation. This person provides “high level” advice to top management on the managerial structure, and relevant associated actions by the dutyholder, for this purpose.

A person is competent for this purpose if they have sufficient training, experience, knowledge, and other qualities to properly assist with fire safety measures. This person is not necessarily the person who carries out a fire risk assessment (see below), but this person may make arrangements for suitable persons to carry out fire risk assessments.

Fire safety legislation requires that you undertake a fire risk assessment for your caravan to identify fire risks and take reasonable measures to ensure that people are safe from fire. In England and Wales, this fire risk assessment must

⁴ Under the Fire Safety Order, the “Responsible Person” and other persons having control of the caravans (as defined in the Order) are dutyholders for the purpose of this Guide.

be “suitable and sufficient”. The fire safety arrangements should be reasonably practicable, noting the size and simplicity of a caravan accommodation unit.

The fire and rescue service within your local area is responsible for the enforcement of fire safety legislation. Although fire and rescue services cannot undertake a fire risk assessment for you, many services do provide advice and support for small operators. Additional information can be found online at your local fire and rescue service website.

This Guide is not intended to provide a detailed interpretation of fire safety legislation. For the exact requirements imposed by the legislation, legal terminology and its definitions, reference should be made to the legislation itself. This Guide largely avoids the use of legal terminology, but provides practical guidance on actions that must be taken to comply with fire safety legislation and relevant recommendations that assist with compliance.

Fire risk in holiday caravans

Statistically, the risk to guests in holiday caravans from fire is very low. Table 1⁵ shows that, in England, the incidence of fire in holiday caravans and camper vans⁶ is very low, with fatalities and casualties occurring only infrequently over the past decade. While the statistical likelihood of such incidents is minimal, the potential consequences remain severe, and continued vigilance is therefore essential.

Table 1: Fires, fatalities and casualties from fire in caravans/camper vans (England)

Financial year	Number of fires	Fatalities	Casualties
2010/11	118	0	4
2011/12	118	0	3
2012/13	46	1	1
2013/14	48	0	3
2014/15	44	0	1
2015/16	61	0	1
2016/17	47	0	1
2017/18	73	0	7
2018/19	49	0	0
2019/20	44	0	7
2020/21	42	0	1
2021/22	35	1	8
2022/23	38	1	4
2023/24	42	1	1

⁵ Source: MHCLG Incident Recording System.

⁶ It is not possible to distinguish between caravan and camper van fires, as these fall within the same category in the fire and rescue service recording system.

These numbers need to be considered in the context of the number of caravans that exist. According to the National Caravan Council (NCC), in 2018, there were approximately 555,000 touring caravans, 225,000 motorhomes and in excess of 365,000 caravan holiday homes. This totals over 1.14 million units of accommodation.

The very low risk reflects the significant number of caravans that are under the direct control of the site operators, and the professional management standards adopted in such cases in respect of routine checks of fire safety measures, such as smoke alarms (e.g. at changeover).

Nevertheless, the presence of sleeping occupants, who are inherently vulnerable to the risk of a fire that occurs during the night, warrants stringent fire precautions and high standards of fire safety management. Moreover, notwithstanding the very low risk, tragic circumstances can arise, in which loss of life has been known to occur.

Case studies

In 2021, a two-year old child died in a caravan fire at a holiday park, a parent and 3 siblings escaped

A family of 5 were involved in a caravan fire. The parent had reported issues with the boiler that had to be lit manually by a staff member. Whilst in the shower, a fire started within the boiler cupboard. Reports indicate that no smoke alarms were fitted, therefore no early warning of the fire was automatically provided. When the parent was made aware of the fire she was able to escape with 3 of her children via the caravan windows. The youngest child was reported as being in the lounge. The mother re-entered the caravan in an effort to rescue her daughter, however was unable to do so.

The fire started in the caravan's boiler cupboard, but the cause of fire was undetermined. An inquest into the death heard that the Gas Safety Certificate for the boiler expired five months before the fire, though the coroner ruled that the boiler could not be specifically blamed for the fire.

For compliance with legislation, annual gas safety certification is required.

In August 2023, a family of five, comprising two parents and three children, survived a caravan fire with no significant injuries.

The family residing in the caravan had a barbecue at some point in the early evening. Believing that the ash / coals were adequately cooled some time after the barbecue, they were placed in a plastic bag and left on the timber decking overnight, ready for disposal the following day.

At some point during the night, the ash/unburned coals ignited and fire spread from the external decking to the external envelope of the caravan. As the fire developed, it breached the external envelope and entered the caravan. At the point at which the fire presented a material risk to occupants, the smoke alarms activated, raising the alarm and waking the family from sleep.

The fire is estimated to have breached the envelope of the caravan at 01:50, at which time occupants were reported to be asleep. The family congregated and exited the front door with no reported issues. The front door was provided with a simple downward operating handle and a simple 'thumb-turn' lock, not requiring a key.

At some point shortly after the initial escape, the father re-entered the caravan to retrieve the family car keys from the master bedroom. As the fire had developed, the father opted to escape via the bedroom window when making his second escape.

A 999 call was made to the fire and rescue service, who attended and extinguished the fire. The family were provided with a medical assessment at the scene by the ambulance service. Hospitalisation was not deemed to be necessary, and no significant injuries were reported.

This scenario demonstrates the core fire safety features operating appropriately. A review of information indicated that the statutory requirements were in place (e.g. gas and electrical safety certification). Additionally, site staff had confirmed that the smoke detectors were operational prior to occupation (changeover), and records were available to confirm compliance.

Site rules prohibited portable barbecues on decking, although this activity was undertaken by guests.

While the father decided to re-enter the caravan and this action is against standard advice, his second escape via the bedroom window did indicate an intuitive knowledge of the alternative escape route and an ability to operate the simple window handles.

The occupants reported to staff that they prioritised escape over undertaking any first aid firefighting themselves.

2. Scope of this guide

This Guide is intended for use in traditionally designed caravans⁷ with simple layouts, limited fire risks and a small number of bedrooms designated as guest sleeping accommodation for short term, self-catering holiday lets.

The guidance is limited to caravans in which all accommodation is on the same level, and in which sleeping accommodation is provided for a maximum of 10 persons.

The fire risk associated with this type of accommodation is generally very low, so the fire risk assessment and fire precautions that are needed are, in most cases, likely to be basic. However, fire risks are not negligible, and appropriate, proportionate consideration of fire safety issues is essential.

This Guide is not appropriate if your caravans fall outside the scope described above or are of an unusual design that materially increases the risk to people and would be detrimental to their means of escape from fire. In these circumstances, more stringent measures might be required and reference should be made to the broader government guidance on the measures required for fire safety in sleeping accommodation⁸.

The Guide applies to:

- Hire fleet units, which are owned by a Park Operator and let;
- Sub-let units, which are owned privately, but let by a Park Operator;
- Privately owned units, which are let privately by an individual or via an agent.

This Guide does not apply to units that are owned privately, and are not let to paying guests. These are, in effect, no different from private owner-occupied dwellings.

The Guide only applies to the caravan units themselves (and any decking), but not to the caravan park or to buildings on the Park, the latter of which fall within

⁷ For the purpose of this Guide, the term “caravan” has the meaning as set out in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968 (as may be amended from time to time). In summary, a caravan is any structure designed or adapted for human habitation which is capable of being transported on a motor vehicle or trailer by design and includes twin-units and lodges which meet the criteria as set out in the legislation. For the avoidance of doubt, this guidance does not apply to touring caravans, motorhomes and tents.

⁸ In England and Wales, Fire safety risk assessment. Sleeping accommodation. (www.gov.uk/government/publications/fire-safety-risk-assessment-sleeping-accommodation). In Scotland, Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation. (www.gov.scot/publications/practical-fire-safety-guidance-existing-premises-sleeping-accommodation)

the scope of government guidance for the types of building in question (e.g. offices, shops, entertainment premises, etc.).

The Guide excludes fire safety measures for any sleeping accommodation that is not incorporated within a traditional caravan, such as lodges that take the form of a fixed building, other buildings, yurts, glamping, etc.

The Guide excludes any matters that will be imposed by local authority site licensing requirements. **However, Park Operators should be aware of relevant conditions within licences, such as minimum spacing between caravans and restrictions on vehicle parking.**

The fire safety measures recommended within this Guide are intended to protect life, rather than property or business continuity. However, some of the measures recommended may contribute to protection of assets.

The Guide does not include fire safety matters that will be included within the Park-wide fire risk assessment.

3. Responsibilities

If you let or sub-let a caravan, under fire safety legislation you must:

- carry out a fire risk assessment for the caravans and record your findings⁹;
- ensure that steps are taken to prevent fire from occurring;
- ensure that adequate fire safety measures, such as escape windows are kept available, and that smoke alarms and fire extinguishing equipment are provided;
- maintain these fire safety measures in good condition and in effective working order;
- provide guests with adequate fire procedures to ensure that they are aware of what to do in the event of fire and that they understand the fire safety measures within their caravan;
- give suitable instruction and training to staff who are involved in checking fire safety measures;
- co-operate with any other party who has duties under fire safety legislation to co-ordinate, as necessary, measures for compliance with fire safety legislation;
- keep your fire risk assessment and fire safety measures under regular review.

Fire safety legislation requires that you must review the fire risk assessment regularly, and when there are significant changes to a caravan that could affect fire safety, and make sure that the fire safety measures in place are maintained in good working order.

As discussed in Section 4, it may be sufficient for a single, generic fire risk assessment to address all caravans on the same Park, under the same management, and of the same typology, provided this is supported by adequate records of routine checks for each and every caravan.

The measures required in the caravans need only be proportionate to the risk. Fire safety legislation does not prescribe the specific measures required, as these should be identified in your fire risk assessment.

⁹ In Scotland, the requirement to record the findings of a fire risk assessment relates only to significant findings, and recording of these is only necessary if you employ five or more persons, or if licensing applies or if (very unusually) an alterations notice issued by the Scottish Fire and Rescue Service requires this.

It should be noted that, simply because there is a reference to the provision of a specific fire safety measure, such as emergency lighting, within fire safety legislation, this does not imply that the measure is always required; fire safety legislation contains a caveat in respect of most fire safety measures, namely that these must only be provided “*where necessary*”.

Again, the “*necessity*” of any measure is determined in the fire risk assessment, which may determine that the measure is not necessary. The reasonable practicability of each measure should also be duly considered.

In this connection, a clear distinction must be made between fire precautions required in workplaces and those required in holiday caravans. For example, in a workplace, staff are instructed in the use of fire extinguishing appliances. There would be no expectation that such instruction would be given to guests in a holiday caravan.

4. Fire risk assessment

Fire risk comprises a combination of two components, namely the likelihood that fire will occur and the likely consequences of a fire if it does occur.

The assessment of fire risk is a requirement of fire safety legislation. For the purpose of fire safety legislation, the consequences of fire relate only to the consequences to people, but not to property or business continuity.

Given the definition of fire risk, a fire risk assessment involves:

- identification of *fire hazards* that could result in the outbreak of fire, and the appropriate measures to prevent fire occurring;
- the measures to protect people if a fire does occur.

When carrying out a fire risk assessment, you will need to consider the people who are likely to use the caravans, including older people, very young children and disabled people, and how they will escape from their caravan in the event of a fire. There is a need to identify any group of people especially at risk from fire. For some people, window escape might not be suitable.

In the case of caravans, preparation of a fire risk assessment can be completed, in most cases, without specialist knowledge, by following the simple steps in this Guide. However, if you do not feel comfortable to carry out a fire risk assessment, you should engage the services of a competent fire risk assessor.

In the sections that follow, there is guidance on the typical fire hazards that should be considered and the measures necessary to protect the people from a fire.

To help you ensure that you do not overlook significant fire hazards and fire protection measures, Section 8 contains a suggested template for undertaking and recording the findings of a fire risk assessment for the caravans on your Park.

This template is generic, such that, provided you are satisfied that the design of every caravan does not vary in a way that is materially different with regard to fire safety, a single fire risk assessment can be recorded for all such caravans on the same Park; it is not considered practicable to document a separate fire risk assessment for each and every similarly designed caravan.

However, a separate fire risk assessment should be carried out and documented for any caravan(s) that varies materially in fire safety measures from this standard design. Material variations would comprise, for example:

- a difference in the size, layout and/or number of bedrooms;

- a difference in the number or design and opening method of windows, which may be necessary as means of escape from fire;
- a difference in the extent of automatic fire detection.

Accordingly, where, for example, there are three designs of caravan on the same Park and these are significantly different (in respects relevant to fire safety), three generic fire risk assessments may be appropriate.

You may choose to carry out the fire risk assessment yourself, but it is important that you feel able to interpret and apply the guidance and recommendations in this Guide to the caravan for which you are responsible.

If you do not feel competent to do so, you should engage the services of a competent fire risk assessor¹⁰, in which case the identity of the fire risk assessor should be recorded on any documented fire risk assessment. Always carry out reasonable checks that the fire risk assessor employed is suitably competent and has relevant experience to enable a fire risk assessment for caravans to be carried out by interpretation and application of this Guide.

It should be stressed that, if you obtain help from someone else to complete your fire risk assessment, you remain legally responsible for the adequacy of the fire risk assessment, and you should act on the outcome of the assessment and its recommendations.

You should make sure that, in assessing the caravans, there are no conflicts with the Park fire risk assessment. There will be a need for co-operation between different dutyholders in this respect.

Fire risk assessments should be reviewed regularly to ensure that they are kept up to date. Typically, the fire risk assessment should be reviewed annually. Some operators carry out a full new fire risk assessment on an annual basis.

However, a review of a fire risk assessment need not involve a full repeat of the original assessment; the review is primarily concerned with identification of any material changes since the time of the original fire risk assessment.

The fire risk assessment should also be reviewed when there are significant changes to the matters addressed in the assessment or when there is a reason to suspect that the original fire risk assessment is no longer valid. For example, after any fire in a caravan, the generic fire risk assessment should be reviewed to ensure that the fire has not brought to light any issues that would warrant a change(s) to the fire risk assessment.

¹⁰ Advice on identifying competent fire risk assessors can be found in “*A Guide to Choosing a Competent Fire Risk Assessor*.” Published by the Fire Sector Federation. (firesectorfederation.co.uk/wp-content/uploads/2020/10/FSF_Guide_V2.pdf)

The fire risk assessments need to be supported by a checklist similar to the one in Section 9 of this Guide. An individual checklist, which confirms that fire safety measures required by fire safety legislation remain in an efficient state, efficient working order and good repair, should be completed for each individual caravan on every changeover of occupants, or on a monthly basis, whichever comes first. It should be noted that compliance checks within caravans will not be required when caravans are not in use, for example, out of season/during the winter months. This guide is only applicable when a unit is let.

As discussed later in this Guide, the checklist does not require the services of specialists, but can be carried out by staff who have been given simple instruction.

5. Fire hazards

A fire hazard is any source, situation or human act with the potential to result in a fire (e.g. ignition sources, accumulation of waste that could be subject to ignition, disposal of a lit cigarette close to combustible materials, etc.).

In your fire risk assessment, you should consider all relevant fire hazards and either remove the hazards, reduce the likelihood of a fire that results from the hazards, or, if this is not feasible, take measures to reduce the likelihood of harm to people from such a fire (see Section 6).

To assist you in considering relevant fire hazards, Figure 1 provides information on the prevalence of fire hazards in caravans (and camper vans). Because of the way fire statistics are recorded, these statistics (and those in Figure 2) include residential caravans, and not solely holiday caravans.

Subsequent sub-sections discuss the fire hazards that are commonly found within caravans, and they provide examples of control measures that could be used to eliminate, or reduce, the likelihood of fire.

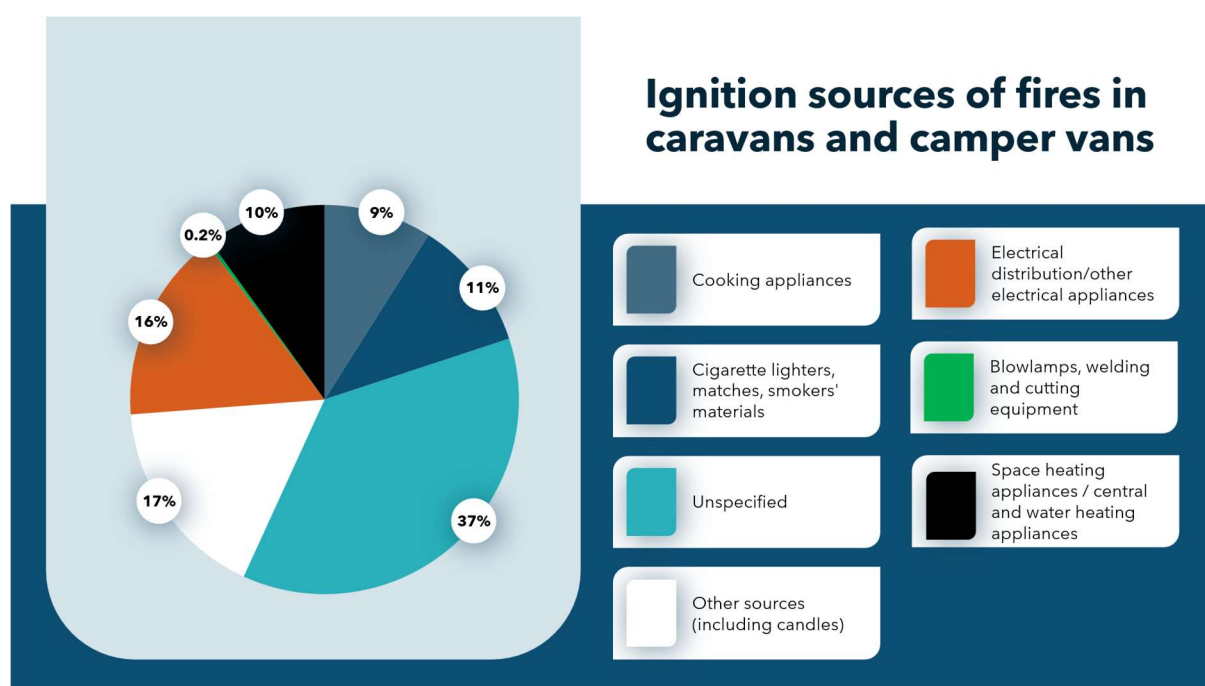


Figure 1: Ignition sources of fires in caravans and camper vans (2010 – 2024)¹¹

¹¹ Source: Home Office

Many of these fires are the result of human acts and carelessness, rather than defective equipment.

In this connection, Figure 2 shows the causes of fire, as opposed to merely the ignition sources.

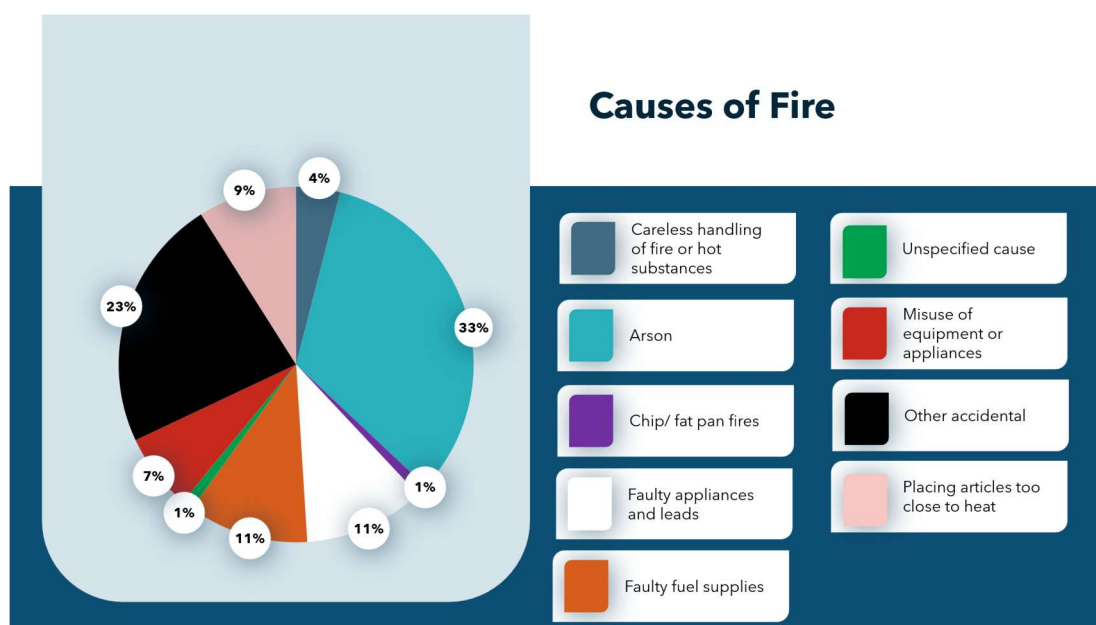


Figure 2: Causes of fires in caravans and camper vans (2010- 2024)¹²

It will be noted, from Figure 1, that electrical sources of ignition, heating systems and equipment and cooking account for the ignition of the majority of fires in which a specific cause is known.

However, Figure 2 shows that the majority of fire incidents are caused by carelessness, misuse of appliances, accidents and arson, with arson forming approximately one third of all causes of fire, highlighting the importance of security measures.

Electrical installations and equipment

Electrical equipment and wiring are common causes of fire, so you should take suitable measures to reduce the likelihood of such fires.

The electrical installation in each caravan must be subject to inspection and testing by a competent person¹³ at least every three years. In addition,

¹² Source: Home Office

¹³ For example, a contractor certificated by the National Inspection Council for Electrical Installation Contracting (NICEIC) or a member company of the Electrical Contractors Association (in England and Wales) or SELECT (in Scotland).

installations should be re-tested and certificated when re-sited from one pitch to another. As good practice, records of these inspections and tests should be kept. Matters identified in the inspection and test report as dangerous, or potentially dangerous, should be subject to urgent remedial action.

Electrical appliances should be subject to regular checks to ensure that they remain in safe working condition in accordance with the manufacturer's instructions. This work should be carried out by a competent person in accordance with the relevant IET guidance¹⁴.

Those responsible for housekeeping in the caravans should be given simple instruction to check plugs to make sure they are not damaged and that cables are not frayed. It should also be checked that any washing machines, tumble dryers and white goods are kept clean. Any lint filters should be cleaned regularly.

The use of extension cables, trailing leads and adapters should be avoided wherever practicable.

Smoking

Smoking is a common cause of fire in conventional dwellings, in which these fires result in more fatalities than any other cause of fire. Accordingly, smoking should be regarded as a potential fire hazard in caravans.

In most cases, smoking is prohibited within caravans; this commonly also applies to vaping and e-cigarettes. Such restrictions should be clearly specified to guests, and any specific areas in which smoking may be carried out should be identified.

This guide recommends that smoking is prohibited within caravans. If, nevertheless, guests are permitted to smoke within the caravans, suitable provisions, such as safety ashtrays and bins should be provided for the safe disposal of cigarettes and other smokers' materials.

Cooking

As in dwellings, carelessness in cooking is a significant fire hazard. General fire precautions adopted in kitchens at home are equally important in holiday caravans.

See also sections on barbecues and fire extinguishing appliances.

¹⁴ IET Code of Practice for In-service Inspection and Testing of Electrical Equipment.

Heating appliances

Guests should be prohibited from bringing electric fires, fan heaters or LPG heaters into their caravan. This should be made clear to guests.

Suitable supplementary heaters, or temporary heating appliances (e.g. during breakdown of normal heating) may be provided. If these are used, you should follow the manufacturer's guidance on their safe use and, ideally, only use heaters fitted with automatic cutoff switches, such as electric oil-filled radiators.

The provision of a wood burning stove would need a separate, additional fire risk assessment.

Gas Safety

Owners of caravans that are let are required by law to have an annual gas safety inspection carried out by a Gas Safe registered engineer.

Candles and tea lights

The use of candles and tea lights within caravans should be discouraged; battery operated candles are preferable if the ambience of candles is considered appropriate.

Barbecues

Use of barbecues within caravans should never be permitted. Guests must be made aware of the controls in relation to using barbecues and fire pits on decking and surrounding areas.

Deliberate ignition

In practice, there are no measures that can be taken to prevent an ill-intentioned person from wilfully starting a fire within a caravan. However, see comments below regarding external housekeeping.

Housekeeping

It should be ensured that combustible materials, refuse and recycling bins are kept clear of each caravan, (particularly any windows) to reduce the risk that an external fire will spread into the caravan through windows and other openings. Combustible storage under the caravan must not be permitted. A check of these matters should be undertaken on a regular basis.

Any vegetation surrounding the caravan should be kept trimmed to prevent any fire development. Where vegetation that is the responsibility of the Park Operator needs to be trimmed for this purpose, this should be drawn to the attention of the Park Operator.

Furniture and furnishings

Furniture and furnishings for each caravan should comply with the Furniture and Furnishings (Fire) (Safety) Regulations 1988 (as amended).

6. Fire protection measures

Having identified any potential fire hazards and assessed whether or not the existing control measures are adequate to stop fires from happening, the next step is to consider what would happen if a fire did start. Fire safety measures that are designed to keep people safe when a fire occurs are usually described as “*fire protection measures*”.

The fire risk, as determined by your fire risk assessment, will determine the level of general fire protection measures required in your caravans to ensure the safety of people. Factors to consider include:

- The number and location of doors and escape windows.
- The number, location and any interlinking of smoke alarms.
- The possible need for signs and notices.
- The provision of fire extinguishing appliances.

Example drawings of some common caravan layouts and typical fire protection measures can be found in Section 7 of this Guide.

Some fire safety measures recommended in this Guide may not be present in older caravans. In these cases, the fire risk assessment must determine whether there is a need to upgrade the fire safety measures and, if so, the priority for this.

In this connection, unlike holiday cottages and similar accommodation, holiday caravans are a depreciating asset. This does not mean that it is acceptable under fire safety legislation for occupants of an old caravan to be exposed to significantly greater risk from fire than occupants of a modern caravan. Fire safety measures in all holiday caravans that are let should follow the recommendations of this Guide, regardless of their age.

However, it does mean that consideration needs to be given to the reasonable practicability of measures specified in a fire risk assessment to ensure that the cost and effort of the recommended measures are proportionate to the risk.

This may require the advice of specialists.

Means of escape

Fire safety legislation requires that occupants of a holiday caravan are able to evacuate the caravan as quickly and as safely as possible in the event of a fire.

Caravans designed and constructed in accordance with BS EN 1647 should have adequate means of escape built into the unit. The means of escape

features detailed below should be industry standard. Any deviations from this will require specific consideration.

The normal means of escape from caravans are simply the entrance doors. In most caravans, there is only a single door. However, larger caravans may have two doors, both typically opening into the lounge/kitchen area.

The living area and every bedroom should be provided with an alternative to the main access door as means of escape to open air. The alternative means of escape normally comprises an escape window (but may comprise a door or a panel), which should have been incorporated in the manufacturer's design of the caravan.

Toilet and shower enclosures should be provided with an escape window unless the door to the enclosure is less than approximately 2 m from the means of escape to open air. As en-suite toilets and showers do not open into a space that has naked flame appliances (bedrooms), escape via the bedroom window is acceptable. These features should be incorporated into the manufacturer's design.

It should be confirmed (e.g. in fire risk assessments and routine checks) that these alternative means of escape remain accessible and operable.

It should be possible to reach each alternative means of escape by means of an unobstructed escape path. Objects such as drawers, furniture doors, bunk ladders, oven doors, etc. that can be moved quickly and easily, by the anticipated occupants, with a single operation need not be considered as an obstruction.

If beds, bunks, fixed furniture, worktops, etc are located permanently under an escape window, they may be considered as an access step to the escape window. The escape window must not be more than 1100 mm above the floor level of the caravan holiday home.

Doors that form part of the means of escape to open air must have simple fastenings, capable of being easily opened, even if locked from the outside, by not more than two operations.

Industry standard caravans typically utilise simple 'thumb-turn' locks and standard downward operating handles, or sliding doors, the use of which is intuitive. The doors will also be used by occupants throughout their occupation which will aid familiarity. In other circumstances, there should be a sign to indicate the method of operation of the door.

Similarly, unless the method of opening an escape window is obvious and intuitive, there should be a sign adjacent to the window to indicate the method of opening it. Escape windows must not be locked by means of a removable key.

There is no expectation that internal or external doors of the caravan will afford any defined period of fire resistance.

Emergency escape lighting

Because the means of escape from holiday caravans are simple and normally involve short distances of travel, there is normally no need for emergency escape lighting in the caravans.

If torches are provided within caravans, these are not normally part of the fire safety measures required by fire safety legislation.

Site lighting beyond the caravan is a matter for the Park Operator to consider.

Fire escape signs

Escape routes within caravans are normally simple and obvious; in most cases, exit doors are in normal daily use. Accordingly, there will normally be no requirement to provide fire exit signs.

In the case of windows, it is generally intuitive to the public that, if the normal exit door from any space is inaccessible because of a fire, windows provide an alternative means of escape. For this reason, fire exit signs for escape windows are normally unnecessary.

As previously covered, if any method of opening an exit door or escape window is not obvious and intuitive (e.g. a door handle that requires upward movement to release the door), there should be a suitable white symbol on a green background to indicate the method of opening the door or window. Alternatively, the method of operation could be altered to a simpler form described above.

Firefighting equipment

In the event of a fire, evacuating the caravan is the safest thing to do and guests should not be expected to use firefighting equipment, (other than to assist their escape and that of others, or to extinguish a fire involving a person's clothing); nor need they be given training on the use of any firefighting equipment provided.

However, you should provide firefighting equipment. This can comprise one dry powder fire extinguisher of at least 1 kg capacity (or equivalent multi-purpose fire extinguisher) and/or a fire blanket, located near to the cooker. The appliance(s) provided should be accessible in the event of a fire on a cooker.

Smoke alarms

At least one smoke alarm must be provided in every caravan.

One smoke alarm should be sited in the living/circulation space(s) of the caravan. Where the lounge is open plan to the kitchen, and covered by a heat alarm, the heat alarm may be used instead of a smoke alarm; If a kitchen is located within a separate enclosure to the lounge, a heat alarm should be installed within the kitchen.

The maximum distance between every bedroom door and the nearest smoke alarm should be no more than 3 m; if a hallway is created by the provision of a door between the bedroom area and the living area, a smoke alarm should be provided in that hallway.

If bedrooms are located at each end of the caravan, with a central lounge, smoke alarms should also be installed in the bedrooms. This is likely to be the case in caravans built after 2022, but not in older caravans. In the latter case, an acceptable alternative to smoke alarms within bedrooms would be a smoke alarm in close proximity to the doors to the bedrooms (i.e. one smoke alarm immediately outside the bedroom doors at each end of the caravan).

If there are more than four bedrooms, a smoke alarm should be installed in every bedroom.

In any case in which there are smoke alarms in every bedroom, there is no need to ensure that any other smoke alarms are located within 3 m of all bedroom doors.

All smoke alarms should be of the optical or multi-sensor type.

All smoke (and heat) alarms should be interlinked, so that, when one alarm device detects a fire, all alarms should sound. Interlinking may be by wiring or radio interconnection.

All smoke and heat alarms should preferably be mains-powered (with a standby battery). This is the expectation in the case of all caravans manufactured after 2022.

Subsequent to the publication of this Guide, if mains-powered devices are not in place at the time of the next fire risk assessment, long-life, tamper-proof, battery-operated alarms may be acceptable as a medium-term measure (e.g. for around six years) until mains-powered alarms are installed. This is subject to the following conditions:

- Testing of smoke alarms (and any heat alarms) complies with the recommendations of this Guide; and
- Arrangements are in place for guests to be able to report a low battery warning on a 24-hour basis (e.g. to site security personnel/representative); and

- Arrangements are in place such that, following the above report, an alarm device with a low battery can be replaced as soon as possible and within 12 hours if the unit remains occupied.

Additional equipment can be provided to give a warning to Deaf or hard of hearing people in the event of fire. This comprises vibrating devices (for installation under pillows or mattresses) and/or flashing beacons.

Smoke alarms that incorporate carbon monoxide sensors (to detect hazardous levels of carbon monoxide from fuel-burning appliances) are available.

Whilst it is noted that this guidance relates to fire safety matters, a carbon monoxide detector must be fitted in all caravans with fixed combustion appliances.

Fire procedures

Action to take in the event of a fire in a caravan is very simple. Guests should ensure that all occupants evacuate immediately and that the fire and rescue service are summoned, without delay.

These measures take precedence over any attempts to extinguish the fire, which should only be made if the fire is small and its location does not impede safe escape.

Fire safety information for guests

Guests should be provided with fire safety information prior to/on their arrival. This information could be provided in a variety of forms, hard copy or digital.

This information should include:

- The procedures to follow in the event of fire
- The fire safety measures provided within the caravan, including alternative means of escape (generally escape windows)
- Park fire safety information including that intended to prevent the occurrence of fire (e.g. in relation to smoking, use of barbecues, candles etc.).
- Emergency contact numbers for a Park representative.

Other than on very small sites, there is normally no welcome procedure for guests, in which there is a verbal introduction to the caravan by staff. However, where there is such a procedure, it provides an additional opportunity to present fire safety information verbally.

Fire action notices

Fire action notices, setting out information on fire procedures are not generally required within individual caravans as the information is normally provided at key locations, such as fire points, on the Park. This may be also incorporated within information, such as park maps, to which guests will refer. Fire procedure information should include the national emergency telephone number (999 or 112).

In the case of large Parks, the name of the park is likely to be identifiable in the fire and rescue service command and control software, which can then generally determine the appropriate fire and rescue crews to mobilise.

However, this may not be true in the case of smaller Parks, where, to ensure effective summoning and attendance of the fire and rescue service, a fire action notice should be provided in each caravan. These notices should state the correct address, including postcode, to give the fire and rescue service in an emergency call.

Maintenance and testing

Fire safety legislation requires that all fire safety equipment is subject to a suitable system of maintenance, and is maintained in an efficient state, efficient working order and good repair.

Regular testing and maintenance procedures should be put in place. You may be able to carry out some of this work yourself, but other work might need to be carried out by a competent person.

It is important that you ensure that such persons are competent to carry out the work for which they are engaged, as the ultimate responsibility for compliance of their work with fire safety legislation rests with you. Use of contractors that are certificated under relevant industry approval or certification schemes assists in verification of competence.

Although not a requirement of fire safety legislation, good practice is for a record of testing and maintenance to be kept; this could be in hard copy or in a digital format. A simple maintenance and testing checklist can be used to make sure that items and equipment are checked and tested in accordance with current best practice.

It is important to note that smoke and heat alarms will need to be replaced periodically. The lifespan will depend on the model, but, for smoke alarms, it is typically regarded as around 10 years.

The following checks and tests should be carried out as specified below.

Change of Occupancy Checks (see also Section 9)

- Make sure that any exit door that is not in regular use, and all escape windows, can be easily opened.
- Check all smoke (and heat) alarms by use of the test button. Where the alarm devices are interlinked, ensure that, when one alarm device operates, all other alarm devices operate.
- Check that fire extinguishing appliances are in place and appear undamaged.
- Check that fire action notices (if any) are in place, undamaged and legible.

The interval between the above changeover checks should not exceed one month (in the event of guests letting accommodation for a period greater than one month).

It should be noted that compliance checks relate to the periods when the accommodation is let. Holiday parks commonly operate on a seasonal basis. These checks are not required when units of accommodation are vacant. Checks will be required prior to reoccupation.

Annual checks

- Fire extinguishing appliances should be serviced by a competent person.
- Arrange for gas safety certificate

Periodically

- Arrange for inspecting and testing of the fixed electrical installation (three yearly).
- Arrange for testing of electrical appliances as specified in Institution of Engineering and Technology (IET) guidance.

7. Examples of common caravan layouts and recommendations on fire protection measures

Examples of common caravan layouts are shown below and indicate various fire protection measures incorporated within each caravan.

The purpose of these drawings is simply to amplify the recommendations contained in this Guide. There may be some variations in layout in the various caravans that can be found on holiday parks. Accordingly, these drawings are intended to be indicative only in relation to fire protection measures.

Specific measures in relation to any particular caravan should be based on the text of the recommendations in this Guide and the legislatively required fire risk assessment.

Where reference to smoke alarms is made, this includes any multi-sensor device that meets the European standard for smoke alarms.

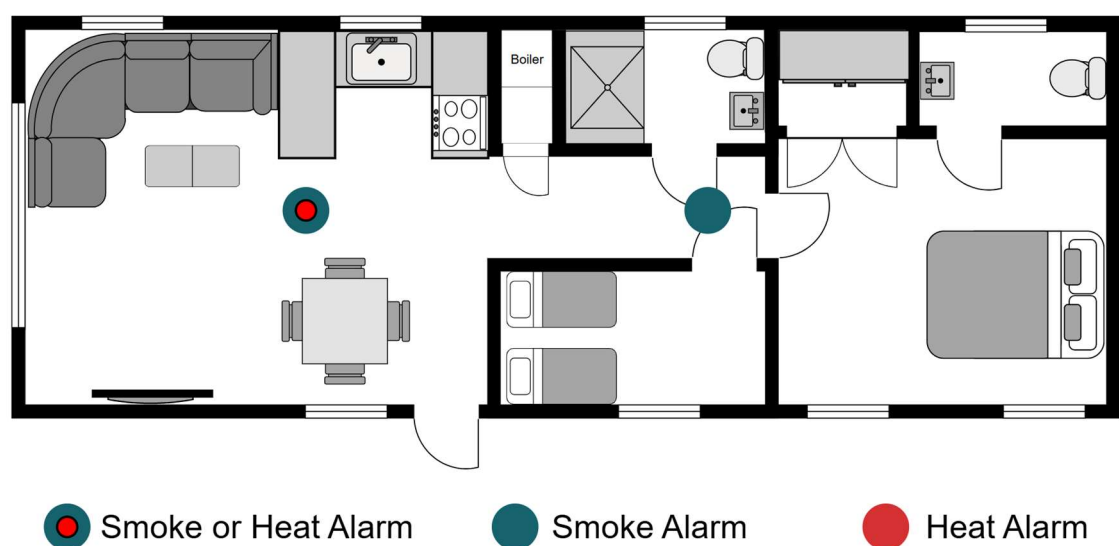


Figure 1 – Smoke or heat detection provided to the kitchen/lounge, smoke detection provided within 3m of bedroom doors. Alarms interlinked.

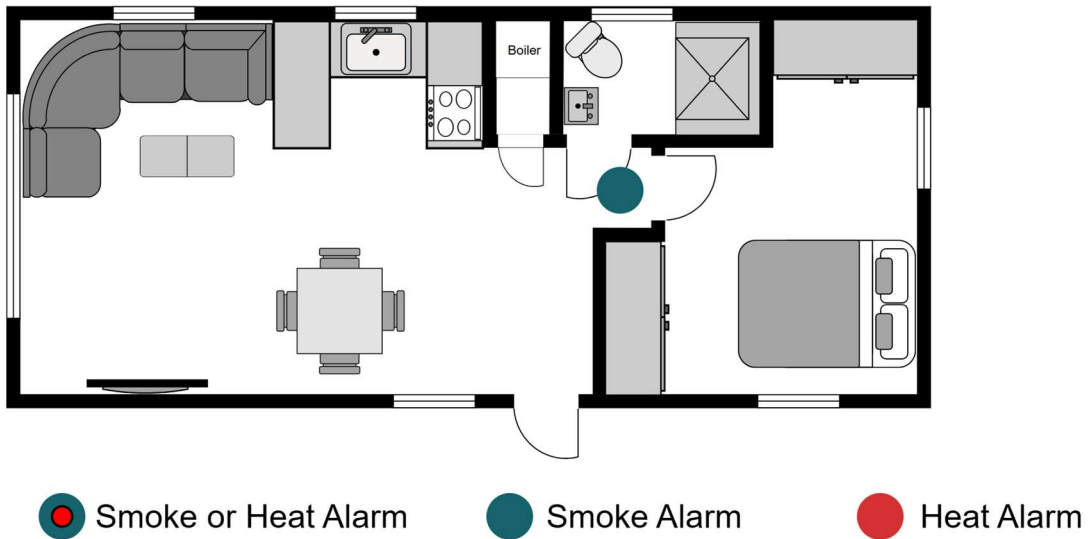


Figure 2 – Smoke detection provided to the kitchen/lounge, smoke detection provided within 3m of bedroom door.

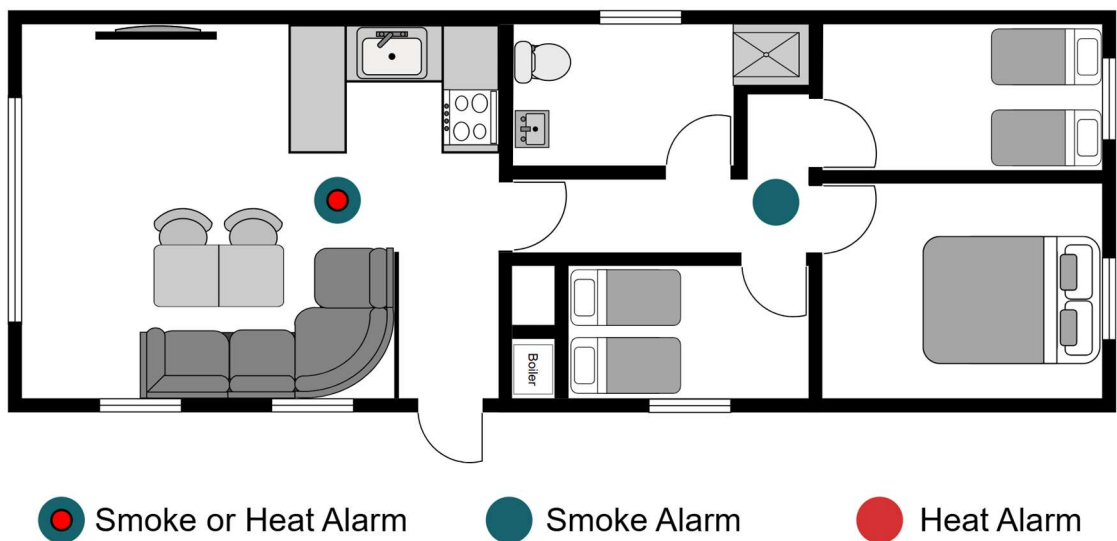


Figure 3 – Smoke or heat detection provided to the kitchen/lounge, smoke detection provided within 3m of bedroom doors (hallway layout). Alarms interlinked.

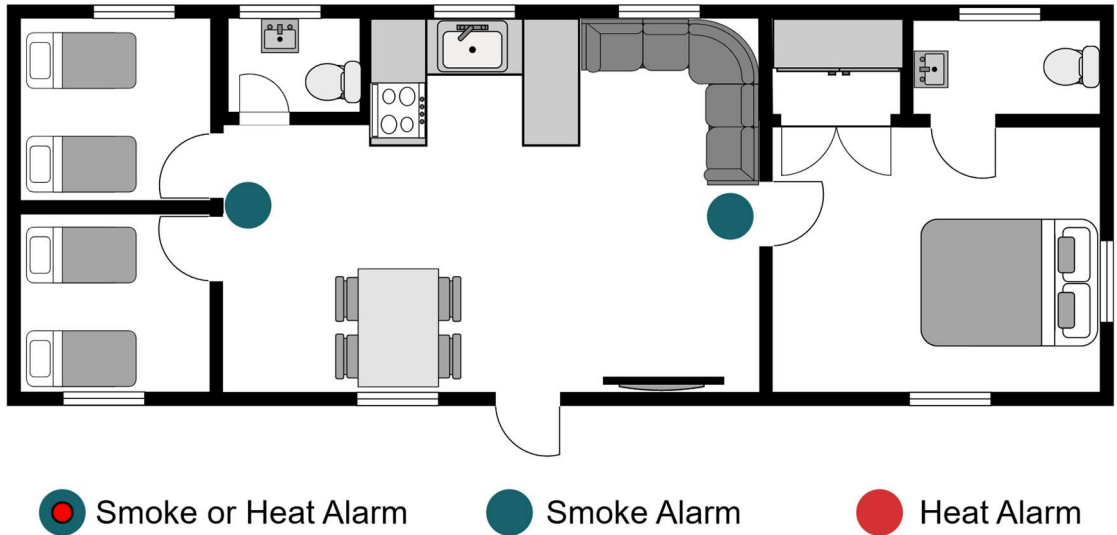


Figure 4 – Smoke detection provided immediately outside the bedrooms based on a central lounge arrangement. Alarms interlinked.

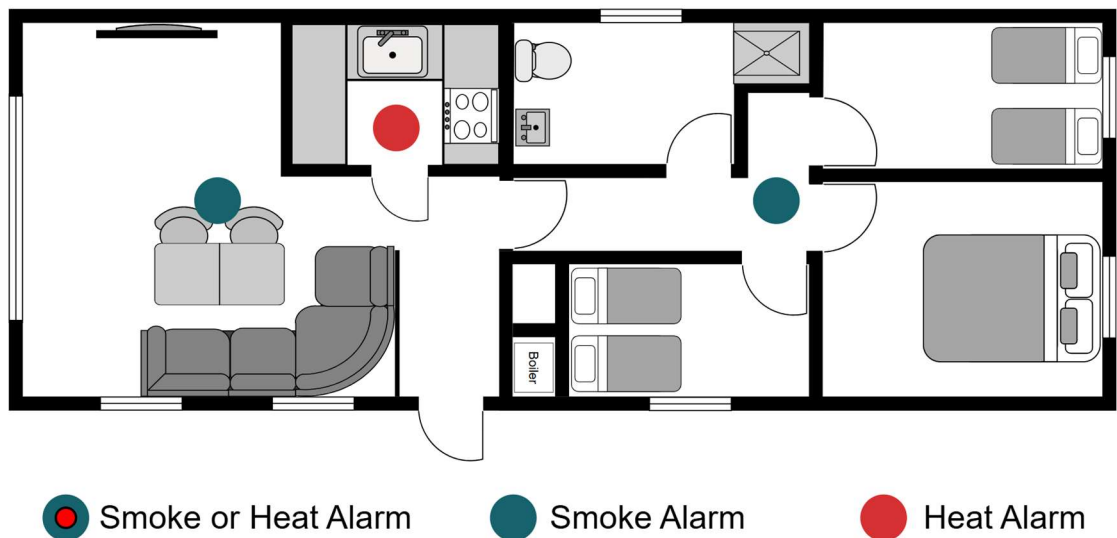


Figure 5 – Heat detection provided to kitchen. Smoke detection provided to lounge and within 3m of bedroom doors (hallway layout). Alarms interlinked.

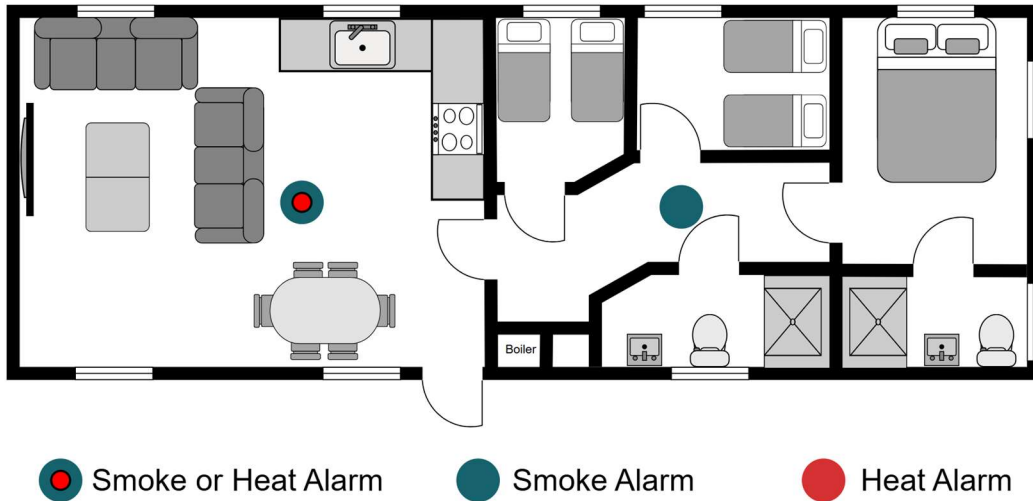


Figure 6 – Smoke or heat detection provided to the kitchen/lounge, smoke detection provided within 3m of bedroom doors (hallway layout). Alarms interlinked.

8. Generic fire risk assessment template for caravans

Address of Site:

Assessor:

Date of assessment:

Dutyholder:

Source of competent assistance (for compliance with fire legislation):

Fire hazards and controls

Has the fixed electrical installation been inspected and tested in the last 3 years? Yes ☐ No ☐

Have the electrical appliances been periodically inspected and tested? N/A ☐ Yes ☐ No ☐

Is the use of trailing leads and adaptors avoided where possible? N/A ☐ Yes ☐ No ☐

Have the gas appliances and the gas installation been inspected and tested within the last 12 months, and are there current certificates? N/A ☐ Yes ☐ No ☐

Is smoking prohibited in the caravans? Yes ☐ No ☐

Are suitable arrangements in place for those who wish to smoke? N/A ☐ Yes ☐ No ☐

Is there an absence of combustible materials, waste and refuse bins in close proximity to, or underneath, the caravans? N/A ☐ Yes ☐ No ☐

Have fixed heating systems been maintained within the last 12 months? N/A ☐ Yes ☐ No ☐

Are adequate measures taken to prevent fires from cooking? N/A ☐ Yes ☐ No ☐

Is it ensured that all persons who undertake work on the caravans are competent and qualified? Yes ☐ No ☐

Are all significant fire hazards adequately controlled? Yes ☐ No ☐

If the answer to any of the above questions is no, please list each hazard and any control measure to reduce the risk of fire, in the box below. If the answer to any question is no, include suitable action within the Action Plan.

Fire protection measures

Are all escape routes (internal and immediately external) clear of obstructions to enable people to escape from the caravans safely?

Yes ☐ No ☐

Are all fire exit doors and escape windows easily and immediately openable?

Yes ☐ No ☐

Where necessary, is a reasonable standard of fire exit and fire safety signs provided?

N/A ☐ Yes ☐ No ☐

Are smoke and/or heat alarms/detectors provided and is the extent and coverage considered adequate?

Yes ☐ No ☐

Are the smoke/heat alarms clearly audible?

Yes ☐ No ☐

Is there a reasonable provision of firefighting equipment (fire extinguishers, fire blanket)?

Yes ☐ No ☐

Record brief details of the above measures in the box below. If the answer to any question is no, include suitable action within the Action Plan.

Management of fire safety

Are procedures in the event of a fire appropriate and documented?

Yes ☐ No ☐

Is the information on fire safety and the action to take in the event of a fire given to guests?

Yes ☐ No ☐

Are any staff members who are involved with the caravans (e.g. housekeeping and maintenance) given regular instruction and training in fire safety?

N/A ☐ Yes ☐ No ☐

At each changeover, is a check carried out to ensure that exit routes are clear, and that fire exits and window escapes remain easily openable?

Yes ☐ No ☐

Are all smoke (and any heat) alarms tested monthly and/or at changeovers?

Yes ☐ No ☐

Are all fire extinguishing appliances subject to annual maintenance?

N/A ☐ Yes ☐ No ☐

Are records of testing and maintenance kept?

Yes ☐ No ☐

Record brief details of the above measures in the box below.

If the answer to any of the above questions is no, include suitable action within the Action Plan.

Action plan

If any of the above boxes are ticked with a 'No', the deficiencies should be described below, along with proposed action for rectification, timescale and person responsible.

Item	Deficiency	Proposed action	Timescale	Person responsible
1.				
2.				
3.				
4.				
5.				
6.				
7.				

Item	Deficiency	Proposed action	Timescale	Person responsible
8.				
9.				
10.				

9. Typical checklist for routine checking, testing and maintenance

This section of the Guide contains a typical checklist that can be used at changeover of guests to ensure that fire precautions in each and every caravan continue to be maintained in a suitable state, efficient working order and good repair. This is to create a record, for each caravan, to verify that the relevant checks described in Section 6 have been carried out.

It is on the basis of stringent checking of the matters described that a generic fire risk assessment is suitable for all caravans of the same typology (see Section 4).

The use of this checklist is not intended to be prescriptive, so checklists may be tailor made for the holiday park operator and the types of caravan present. The checklist may be completed in hard copy or electronically (e.g. on a tablet), and may be incorporated within other checklists adopted by the operator (e.g. part of a broader health and safety checklist).

Check that any exit door that is not in normal use, and all escape windows, are easily openable	
Test smoke/heat alarms and any interlinking	
Check that any fire extinguisher is in place and undamaged	
Check that any fire blanket is in place and undamaged	
Check that any fire action sign is undamaged	
Check that there are no combustible materials in close proximity to caravans. A periodic check underneath the caravan should also be undertaken	

10. Further information

Many fire and rescue services, particularly those in rural areas, include, in their websites, fire safety information for holiday caravan parks and caravans. Accordingly, you may find useful further information from these sources.

