

Community  
Living  
Toronto



# Fire Safety Issues



Fortunately, this is one issue we have NOT encountered!

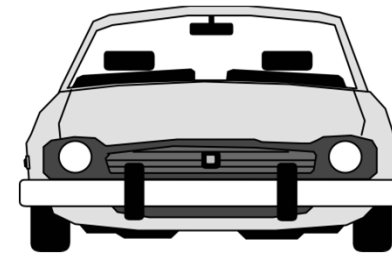
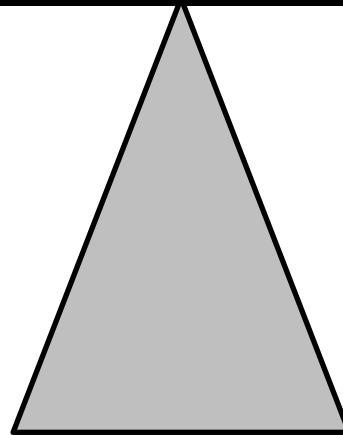
# 1. Door Locks



# THE DILEMMA

Escape From Danger  
**INSIDE**

Protection From Danger  
**OUTSIDE**



Fire inspectors insist that all occupants of the house must be able to have unrestricted access to exit doors in case of fire – 24/7 staffing notwithstanding. Their argument is “what if the staff are incapacitated?” At the same time, there is a much more imminent risk of injury or death should a resident run out into traffic or wander away and get lost.

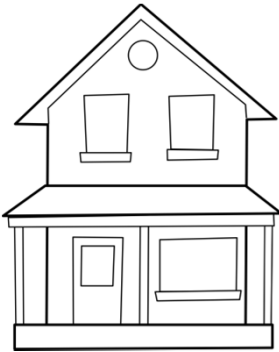


Permissible in a “dwelling unit” but not a care occupancy

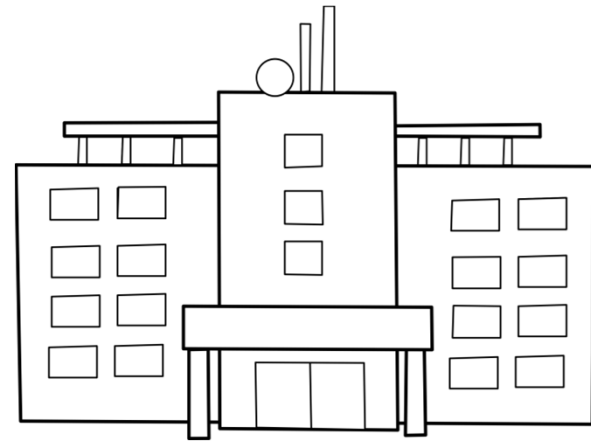


# Fire Code Definitions

Dwelling Unit



Care Occupancy



Under the most recent fire code amendments most of our group homes fall under the definition of a "Care Occupancy" (O.B.C. class B-3)

# Locking Devices

## *Requirements for locking, latching and fastening devices*

2.7.2.2. (1) Subject to Sentences (2) and (3), locking, latching and other fastening devices shall be such that a door can be readily opened from the inside with **no more than one releasing operation and without requiring keys, special devices or specialized knowledge** of the door opening mechanism ...





...Another effective option that would not be allowed!





## IMPEDED EGRESS

The only allowance in the fire code for detaining individuals

- (2) A door in an **access to exit** or an **exit** door may be equipped with an **electromagnetic locking** device that is **approved** or complies with the **Building Code**, unless the door is located in an elementary or secondary school or is an egress or **exit** door that serves a **high hazard industrial occupancy**.
- (3) An egress door that serves a **contained use area** or **impeded egress zone** may be equipped with a locking device that can be released either **locally** or **remotely** in accordance with Sentences (4) to (6).
- (4) A locking device with a local release permitted by Sentence (3) shall be capable of being unlocked with a key from both sides of the door.
- (5) The controls for the remote release of a locking device permitted by Sentence (3) shall be in an area that is readily accessible to **supervisory staff**.
- (6) A locking device permitted by Sentence (3) that is electrically operated shall be
  - (a) designed to operate on emergency power, and
  - (b) capable of being manually unlocked by **supervisory staff**.

# MAG-LOCK REQUIREMENTS

- Full Alarm System
- Non-combustible environment
- Engineering/permits
- Service/testing

Installing/maintaining the necessary alarm system and magnetic locks would be expensive, but the non-combustible requirement makes it impossible.

# ALTERNATE SOLUTIONS

Until such time as the code makes allowances for small scale care occupancies we are left with finding other ways to confine residents who are at risk. Some inspectors have been lenient and allowed a simple chain lock because they recognize the obvious risks. But there is no guarantee that the next inspector to come along will not follow the code strictly and order that they be removed.

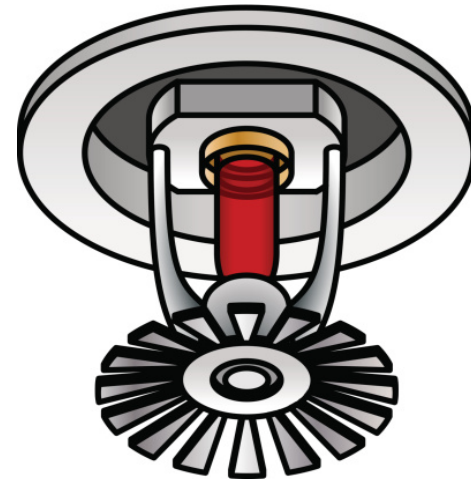
- Fencing - Detainment on the outside
- Alarms - Alert/deterrent
- Diversion - Reduce ease of access to exit
- Hybrid Mag-locks? - Delayed release
- Fire code amendment???

## 2. Sprinklers





Saves Lives



Saves Buildings

**Sprinklers also buy time.** Allowable time to evacuate a room with a sprinkler is approx. 4.5 minutes (compared to less than 2 min. without). Fire is contained, extending estimated time to evacuate house to 60 minutes.

**Override other requirements.** In some situations, a sprinkler system creates an exception to other requirements. (i.e. exits, stairs, doors)

**Legislation** Sprinklers required in all **Care Occupancies** by Jan. 1, 2019

# 3. Evacuation Drills



# Annual Fire Drill

(6) In addition to the requirements of Sentence (2), in a **care occupancy**, a **care and treatment occupancy** or a **retirement home**, a fire drill for **supervisory staff** shall be carried out at least once during each 12-month period for an **approved** scenario representing the **lowest staffing level complement in the occupancy** in order to confirm that the requirements of Sentence 2.8.2.2.(1) have been met.

## *Notification of Chief Fire Official*

2.8.3.3. The **Chief Fire Official** shall be notified within an **approved** time period before every fire drill carried out under Sentence 2.8.3.2.(6)

**Once a year, with a fire inspector present, an evacuation must be carried out simulating a worst case scenario:**

- **late at night**
- **all residents in bed**
- **minimal staffing**
- **fire originating in an occupied bedroom.**

## Results:

- Improved ability to respond appropriately
- Clear time frames for evacuation
- Increased awareness of risks
- Assessment of ability
- Reveals deficiencies
- Working relationship with fire officials





# 4. Training



## Staff Training and Records

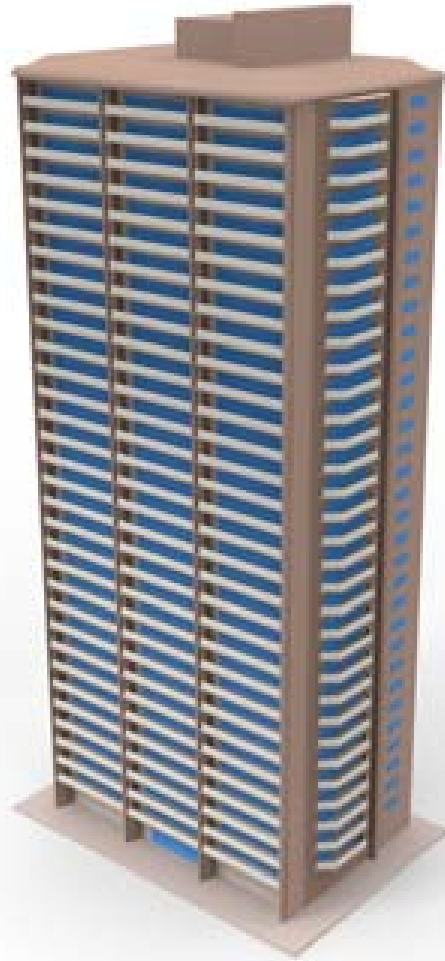
(7) In the case of a **care occupancy, care and treatment occupancy and retirement home, any training of supervisory staff carried out under a fire safety plan shall be recorded.**

(8) The original or a copy of at least the most recent and the immediately preceding record referred to in Sentence (7) shall be **retained in the building for a period of at least two years** after being prepared and shall be made available to the **Chief Fire Official** for examination on request.

## Current Issues

- Inclusion of overnight staff in monthly fire drills. Fire inspectors have recently indicated that the annual worst-case minimum staff drills will eventually have to be carried out by actual overnight staff. (Currently any staff can perform the evacuation)
- Make fire drills more realistic and dynamic.
- Standard fire plan training guide.
- Techniques for transferring immobile residents into wheel chair without Hoyer lift.

# 5. High Rise Fire Drills



There are a few locations where a number of apartments in a high rise are licensed as a group home. As such they are required to carry out monthly fire drills. However the standard protocol for residential high rises is to remain in one's unit until instructed to leave the building. And even leaving voluntarily would involve the use of stairs, which residents with mobility issues cannot do. So the question that arises is: What does the monthly fire drill consist of? Or can monthly drills be omitted?

This unique situation has been presented to the Ontario Fire Marshal's office (who has responded) and we are awaiting their advice. We are also consulting MCSS for their view on the issue.