

SCOTTISH EXECUTIVE

Building Standards (Scotland) Regulations 1990 (As Amended) Locks on Exit Doors

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Covering Letter

[Distribution List enclosed](#)

Our ref: QTD 1/5

October 2000

Dear Sir or Madam

Enclosed for your information is a copy of Building Regulation Note 8/2000.

This Note provides guidance and advice on issues to be considered when relaxations are requested for locks on exit doors; and is intended to assist local authorities by identifying some of the factors that they may wish to bear in mind when determining an application for a relaxation.

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Yours faithfully



J A CARTER

Head of Building Control Policy Branch

1. INTRODUCTION

1.1 This note provides guidance and advice on issues to be considered when relaxations are requested for locks on exit doors. Technical Standard E5.4a states:

"where a door across an exit route has to be secured against entry when the building is occupied it must be fitted only with a lock or fastening which is readily operated, without a key, from the side approached by people making an escape".

The only exception to this is in the case of a place of lawful detention. However, local authorities are receiving many applications for relaxation of this standard. Applicants wish to fit varying types of electrically powered automatic locks, ordinary locks, shutters, or other devices. The decision on whether or not to grant such a relaxation lies with the local authority, because it will depend on the precise circumstances of the case. A local authority must also consult the fire authority before making a decision.

1.2 This note is intended to assist local authorities by identifying some of the factors that they may wish to bear in mind when determining an application for a relaxation. This note is not intended to interfere in any way with the powers given to individual local authorities to grant or refuse individual relaxations. Each application must be considered on its merits and it is impossible and undesirable to attempt to generalise.

2. PRINCIPLE

2.1 The intention of the Technical Standard is to ensure that exit doors are always available for use by those within a building, and the safe and rapid egress of all occupants must be the first factor under consideration. However it is recognised that in many buildings the occupiers may wish to limit access or egress through certain doors. How they do this should be a management issue, and must not jeopardise the means of escape required under the building regulations.

2.2 An additional factor to be considered in regard to relaxation applications for locking systems is the ease with which the fire brigade would be able to effect entry from the outside if there is a need for rescue. This may be a particular problem with controlled doors dividing a building into secure areas. In such situations it may not be so easy to bring into action the equipment necessary to force entry. Consultation with the fire authority can resolve these problems.

3. ELECTRONICALLY POWERED LOCKS

3.1 When considering the acceptability of electronically powered locks on exit doors, a local authority may wish to ensure they meet all the following requirements:

- they "fail safe" so that the door is unlocked in the event of power failure, system error or failure of the alarm system; and
- they are unlocked automatically on the activation of the fire alarm; and

- there is an easily operated override at the door.

3.2 The first of these points requires some clarification as it has come to our attention that some installations have been considered to "fail safe" when they failed to the locked condition for security reasons. Clearly in the case of fire exits this is never appropriate and "fail safe" must always mean failing to the unlocked position.

3.3 The third of these points also requires some elaboration, the standard requires them to be fitted only with a lock or fastening which is readily operated, without a key. This means the operating devices must be useable by anyone in the building and so would normally prevent the use of card operated locks, unless there was an emergency override.

4 CARE PROPERTIES

4.1 In the case of residential care properties which are home to people who might put themselves at risk by going through certain doors, there is a further problem. This might be the case in a two-storey residential home for the elderly mentally infirm where there is concern about individuals falling down stairs. Alternatively it might be a mental health unit providing refuge for severely disturbed people who unintentionally put themselves at risk by leaving the building. The problem could also occur in buildings that are only occupied for part of the day, such as a nursery where there is concern about young children leaving the building unsupervised, or of outsiders gaining unauthorised access to the building.

4.2 If there is a danger of people putting themselves at risk through leaving a safe environment, it may be possible to consider a secure site boundary. If the site is enclosed it would not constitute a "place of safety" as required by the Technical Standards, but it may well be acceptable to permit the locking of boundary or garden gates, provided they are far enough away from the building for those escaping to be out of danger from a fire.

4.3 If there is a risk of the occupants of a building falling down stairs and coming to serious injury, the question has to be asked as to why they were on the upper levels in the first place. However if there is no alternative to an upper level location then it might be reasonable to permit doors to stairways to be locked provided it is clearly apparent that the risk of death or injury from falls is greater than the risk of death or injury from being trapped by a fire.

5. SCHOOLS

5.1 There is a particular concern about the security of schools, especially primary schools and nurseries. However this concern is mainly about unauthorised access and not about unauthorised egress. Means of escape must be available at all times and measures taken to prevent entry must not be allowed to hinder such exits. For example if an electronic locking system is to be installed then it must be capable of being easily overridden at every exit door.

6. SHUTTERS

6.1 Shutters are prohibited across exit doors by Technical Standard E3.4d. The only instance where a shutter is permitted is one installed for security purposes across a shop front that does not close automatically in the event of fire. Therefore they should never be accepted in other situations over fire escape doors.

7. WORK AFTER A COMPLETION CERTIFICATE HAS BEEN ISSUED

6.1 One frequent problem is the desire of the owner to add additional devices once the building is occupied. Where a building owner wishes to alter the exit doors or add additional locks, shutters or other security devices after a completion certificate has been issued then it will be necessary to seek a building warrant for such work. The normal warrant process, with relaxations if thought appropriate, will apply.

7.2 It is therefore essential that where an owner asks a fire authority about the acceptability of additional locking devices or shutters, there is full consultation between the building control and the fire authority before any decision is given.

8. FURTHER INFORMATION

For further information contact:

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