
STANDATA interpretation 23-BCI-002/23-FCI-009

Building/Fire

Overnight child care

Date Issued: April 2024

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Purpose

To clarify applicable requirements of the National Building Code - 2023 Alberta Edition (NBC(AE)) and the National Fire Code - 2023 Alberta Edition (NFC(AE)) for occupancies licensed to provide overnight child care services.

Discussion

Child care services are classified as Group C residential occupancies for dayhomes or as Group A, Division 2 assembly occupancies for daycares. Changes in the [Early Learning and Child Care Act](#) (ELCCA) regulations and policies in early 2021 resulted in the expansion of accommodations for overnight child care services. This interpretation has been developed to provide guidance on the correct application of the [Safety Codes Act](#) for these accommodations as regulated under the ELCCA.

For the purposes of this interpretation, Children and Family Services refer to services provided by an organization that is responsible for a child for a period not exceeding 24 consecutive hours.

Free copies of the NBC(AE) and the NFC(AE) are available for download at the following links:

- [National Building Code – 2023 Alberta Edition](#)
- [National Fire Code - 2023 Alberta Edition](#)

Code References

Division A, Article 1.4.1.2.

1.4.1.2. Defined Terms

Smoke alarm means a combined *smoke detector* and audible alarm device designed to sound an alarm within the room or *suite* in which it is located upon the detection of smoke within that room or *suite*.

Smoke detector means a *fire detector* designed to operate when the concentration of airborne combustion products exceeds a predetermined level.

Sentences 3.2.4.20.(1) and (2)

3.2.4.20. Smoke Alarms

- 1) Except as provided in Article 3.2.4.21., *smoke alarms* shall be installed in accordance with this Article.
- 2) Except as required by Sentence (5) and permitted by Sentence (10), *smoke alarms* conforming to CAN/ULC-S531, "Standard for Smoke Alarms," shall be installed in each *dwelling unit* and, except for *care, treatment or detention occupancies* required to have a fire alarm system, in each sleeping room not within a *dwelling unit* or *suite* of *care occupancy*.

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Sentence 3.2.4.21.(1)

3.2.4.21. Residential Fire Warning Systems

- 1) Except where a fire alarm system is installed or required in a *building*, *smoke detectors* forming part of a residential fire warning system installed in conformance with CAN/ULC-S540, “Standard for Residential Fire and Life Safety Warning Systems: Installation, Inspection, Testing and Maintenance,” are permitted to be installed in lieu of all *smoke alarms* required by Article 3.2.4.20., provided the system
- a) is capable of sounding audible signals in accordance with Articles 9.10.19.2. and 9.10.19.5.,
 - b) is powered in accordance with Article 9.10.19.4., and
 - c) is provided with a silencing device in accordance with Article 9.10.19.6.

Clause 3.2.4.1.(4)(f)

3.2.4.1. Determination of Requirement for a Fire Alarm System

- 4) Except as permitted by Sentence (5), (6) and Sentence 3.2.4.2.(4), a fire alarm system shall be installed in a *building* that is not *sprinklered* throughout and that contains
- f) a school, college, or child care facility, including a daycare facility, with an *occupant load* more than 40,

Sentences 9.10.18.2.(1),(2) and (5)

9.10.18.2. Fire Alarm System Required

- 1) Except as permitted in Sentences (3) and (4), a fire alarm system shall be installed in *buildings* in which a sprinkler system is installed.
- 2) Except as provided in Sentence (5), a fire alarm system shall be installed
- a) in every *building* that contains more than 3 *storeys*, including *storeys* below the *first storey*,
 - b) where the total *occupant load* exceeds 300, or
 - c) when the *occupant load* for any *major occupancy* in Table 9.10.18.2. is exceeded.
- 5) A fire alarm system is not required in a *residential occupancy* where an *exit* or *public corridor* serves not more than 4 *suites* or where each *suite* has direct access to an exterior *exit* facility leading to ground level.

Table 9.10.18.2.

Maximum Occupant Load for Buildings without Fire Alarm Systems Forming Part of Sentence 9.10.18.2.(2)	
<i>Major Occupancy Classification</i>	<i>Occupant Load Above which a Fire Alarm System is Required</i>
<i>Residential</i>	10 (sleeping accommodation)

NFC(AE) Division B, Clauses 2.8.1.1.(1) (a) and (b)

2.8.1.1. Application

- 1) Fire emergency procedures conforming to this Section shall be provided for
- a) every *building* containing a *care, home-type care, treatment* or *detention occupancy*,
 - b) every *building* containing a school, college or university, or a daycare facility,

NFC(AE) Division B, Sentence 2.8.1.3.(1)**2.8.1.3. Keys and Special Devices**

1) Any keys or special devices needed to operate the fire alarm system or provide access to any fire protection systems or equipment shall be readily available to on-duty *supervisory staff*.

Application

The following interpretation applies to dayhomes or daycares providing child care services with overnight sleeping in accordance with the [ELCCA](#).

Interpretation

1. Residential Occupancy Dayhome:
 - Smoke alarm installation in compliance with the NBC(AE) which includes but not limited to:
 - Smoke alarm in every sleeping room or area
 - Smoke alarm on each level of the residence
 - Smoke alarm between the sleeping and living area
 - Smoke alarms interconnected so that if one alarm is activated all alarms will sound
 - In lieu of smoke alarms, the installation of a residential fire warning system installed in conformance to CAN/ULC-S540.
 - Carbon monoxide alarm or alarms installation in compliance with the NBC(AE).
 - Egress window or door to the exterior from sleeping rooms or area (unless sprinklered).
 - It is recommended a minimum of two fire extinguishers, one by each exit, be maintained on site.
 - It is recommended the dayhome have a fire safety plan and conduct regular fire drills.
 - Dayhomes are classified as a Group C residential occupancy and are not required to have a fire inspection. Upon request or complaint, the Authority Having Jurisdiction (AHJ) may conduct and enforce a fire inspection. The AHJ will determine, based on their Quality Management Plan and the *Safety Codes Act*, if they are able to provide and enforce a fire inspection.
2. Assembly Occupancy with total sleeping accommodations of 10 or less:
 - Awake overnight staff.
 - Smoke alarm installation in compliance with the NBC(AE) which includes but not limited to:
 - Smoke alarm in every sleeping room or area
 - Smoke alarm on each level
 - Smoke alarm between the sleeping and living area
 - Smoke alarms interconnected so that if one alarm is activated all alarms will sound
 - Fire alarm system in compliance to interpretation (3) is acceptable in lieu of smoke alarms.
 - Installation of carbon monoxide alarm or alarms.
 - Egress window or door to the exterior from sleeping rooms or area (unless sprinklered).
 - In lieu of egress window or door to the exterior, provide at least two separate means of egress from suite.
 - Requires a minimum of two fire extinguishers, one by each exit (NFPA10).
 - Fire safety plan.
3. Assembly Occupancy with total sleeping accommodations of more than 10:
 - Awake overnight staff.
 - Fire alarm system.
 - Smoke detector in each sleeping room or area.
 - Smoke detector on each storey.
 - Installation of carbon monoxide alarm or alarms.
 - Egress window or door to the exterior from sleeping rooms or area (unless sprinklered).

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- In lieu of egress window or door to the exterior, provide at least two separate means of egress from suite.
- Requires a minimum of two fire extinguishers, one by each exit (NFPA 10).
- Keybox or on-duty supervisor staff.
- Fire safety plan

This INTERPRETATION is applicable throughout the Province of Alberta.

Unless stated otherwise, all Code references in this STANDATA are to Division B of the National Building Code – 2023 Alberta Edition

Issued by the Provincial Building and Fire Administrators

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