

No. B26-03

February 25, 2026

Before and After School Programs

This bulletin provides information on programs often offered in schools before and after instructional times, and how the British Columbia Building Code (Building Code) and British Columbia Fire Code (Fire Code) apply when those programs are added and/or revised. This bulletin does not discuss before and after school programs offered in buildings other than schools and does not discuss existing programs in existing schools.

When this bulletin refers to schools, the assumption is that the school is an existing building that is classified by the Building Code as an assembly occupancy.¹ This bulletin recognizes that schools typically consist of multiple spaces, each with specific and/or dedicated activities as their intended uses, as well as possibly being available for temporary and/or subsidiary uses that may differ from their primary intentions.

When considering adding or revising programs outside instructional times in schools, it is necessary to consider the spaces that will be occupied so that those attending and administering the programs will be in a safe and healthy environment. Programs, as well as the schools they operate in, are unique and the appropriate application, or non-application, of the Building Code and Fire Code is best determined through discussions with the parties involved such as the building owners, design teams, program operators, local officials and fire services. This bulletin is intended to inform those discussions.

The before and after school programs discussed in this bulletin are those for school-age children. These programs should not be confused with daycare programs for children under 30 months of age which have building requirements specific to the level of safety necessary of facilities providing daycare programs for younger children.²

The Building Code applies to the activities of design and construction (including alteration and deconstruction), and it ceases to apply once the activities of design and construction (and deconstruction) of a building are complete. The Fire Code applies throughout the life of the building to ensure fire safety measures are maintained.

¹ The Building Code permits small assembly occupancies to instead be classified as business and personal services occupancies. Should an existing school be classified as a business and personal services occupancy based on this permission, it is reasonable to continue considering it as such provided activities remain similar and the conditions of the permission are maintained.

² See Article 3.3.2.18. of Division B of the Building Code.

Program operators should also become familiar with the [Director of Licensing Standard of Practice – School Age Care on School Grounds](#). This Standard of Practice is not a building or fire code but does inform use of buildings for compliance with the [Community Care and Assisted Living Act](#) and the [Child Care Licensing Regulation](#).

Terms

The Building Code and Fire Code define certain terms so that code users have clarity and consistent understanding when applying the codes. It is important to recognize that those definitions are only applicable within the context of the code they are used in. Those same terms get used in other contexts, and in the case of other enactments (legislation, regulation, bylaws, etc.), the meanings and context assigned in those enactments should not be assumed or replaced with the meanings and context assigned within the codes.

Definitions for some Building and Fire Code terms used in this bulletin are reproduced in Appendix A of this bulletin for reference. It is worth noting that the [Community Care and Assisted Living Act](#) has its own definition of ‘care’ which differs from the Building Code and Fire Code’s definition reproduced in Appendix A. When applying the Community Care and Assisted Living Act, apply its definition of ‘care’ and when applying the Building Code and Fire Codes, apply their definition of ‘care’.

Fire Safety Plan

The fire safety plan must be reviewed whenever there are changes of use or other characteristics of a building. Adding and/or changing programs in schools may require updates to the fire safety plan to ensure the school building is sufficiently equipped to provide notification and facilitate evacuation in a fire event and that the necessary personnel are able to respond appropriately to the fire event. Examples of updates include training and fire safety duties of supervisory staff and the holding of fire drills. **The fire safety plan and any updates need to be prepared in cooperation with the fire department and any other applicable regulatory authority.**³ Fire safety plans, and emergency planning generally, are described in Section 2.8. of Division B of the Fire Code.

It is recommended that one of the first activities when planning before and after school programs in schools is to review the fire safety plan and update it to address new circumstances related to the use of the space. In most cases, a well-developed fire safety plan and trained supervisory staff will be able to manage risks without requiring changes to the existing school building. Where changes to the building occur, such as for operational

³ It is the responsibility of the building owner and/or the owner’s authorized agent to determine the applicable authorities that are to be consulted, recognizing that third-party operators may be tenants.

reasons, the alterations to the existing school would have to be done in accordance with the Building Code.

Information on responsibilities and requirements for fire safety plans can be found in Appendix B of this bulletin.

Occupancy

In many cases, before and after school programs designed for school-age children are an extension of the education, social, recreational, and similar purposes schools were designed and built for. In those cases, the addition of, or change to, before and after school programs would be unlikely to meet the Building Code criteria of a 'change of occupancy,' even though they may extend the times the schools are occupied.

The Building Code applies when there is a change of occupancy, but adding a program of assembly occupancy in a school that is an assembly occupancy is not a change of occupancy. However, there are other activities that would trigger application of the Building Code. For example, if an alteration is made – such as adding a door to restrict access to a portion of the school – that alteration would need to be done according to the Building Code. (And in this example, the door cannot restrict access to a required egress route from the program area.)

The Building Code does not apply retroactively, meaning existing buildings are not required to renovate each time a new edition of the Building Code gets adopted or revised. Existing buildings may have a different level of performance than what would be required for new buildings. The Building Code accommodates these differences and states that when an existing building is altered, it must maintain the level of life safety and performance that already exists. Because existing buildings are all unique, this requires discretion and good judgement by the parties involved on how existing equipment and construction can be made to accommodate any new building alterations to meet the current Building Code. It isn't acceptable for an alteration to reduce the level of safety or health in a building. Similarly, the Fire Code requires that originally approved fire safety systems installed be maintained and are working as per original approved design. The Fire Code does not require the original systems installed and approved to be upgraded to meet current Code installation requirements each time a new edition of the Building Code and Fire Code get adopted or revised.

For example, if the existing school building's exit signs have the word "EXIT" in red lettering and are not the green pictogram type recognized by the current Building Code, it is not a requirement of the Fire Code that the signs be changed; they are required to be maintained in working condition. In many existing school buildings, the red exit signs would have been

compliant with the applicable edition of the Building Code when they were first installed, and the (current) Fire Code focuses on ensuring they continue to perform their intended safety function of identifying an exit in an emergency.

Care

The term care can cause confusion as it is often associated with before and after school programs – and this is quite reasonable given dictionary definitions for the term. Confusion can exist when the Building Code and Fire Code’s definition of care is used outside the context of those codes. **Daycare is not care.** The Building Code classification of daycares as an assembly (Group A2) occupancy is distinct from a *care* (Group B3) occupancy. (The Building Code also permits small assembly occupancies to be classified as business and personal service (Group D) occupancies.)

The defined term ‘care’ in the codes means something quite specific and describes activities and uses that are different from the activities and uses of typical schools. The codes’ use of the term ‘care’ is to classify a building type where facility management provide services required because of cognitive, physical, or behavioural limitations. Being school-aged and supervised is not itself a limitation that the codes intend to occur in a ‘care’ occupancy. It is reasonable and even expected that schools will have children attending that require extra support, but this doesn’t change that the purpose of occupancy is educational. Whether in school, or in before and after school programs, a supervision plan can effectively support these children. Note A-3.1.2.1.(1) of Division B of the Building Code offers a list of examples of ‘care’ occupancies which helps illustrate the distinction between ‘care’ in the codes and school programs, which are typically considered an assembly occupancy.

The [Community Care and Assisted Living Act](#) also has a definition of the term ‘care’. This definition is to be applied when the Act and its pursuant regulations are applied. The Building Code’s classification of daycare facilities is coordinated with the Community Care and Assisted Living Act.

Programs for school-aged children are distinct from daycare programs for younger children. Before and after school programs for school-aged children can be quite similar to the activities that already happen in schools (education, social, recreational, and similar) whereas daycare programs for younger children can include activities such as sleeping and have a greater reliance on program staff to aid in evacuation in the event of an emergency. The Building Code considers daycare facilities for children to be the same occupancy classification as for schools.⁴

⁴ See Article 3.1.2.8. of Division B.

Assessing Existing Spaces

When planning programs in schools the existing spaces should be assessed to inform the suitability of the spaces for the intended occupants and activities. When schools are designed, they are designed for an intended maximum number of people and anticipated activities. It is not safe or permitted to have more people in the space than the maximum occupant load established by the Fire Code (Article 2.7.1.3. of Division B). The number of occupants must be within the capacity that exit routes can handle in an emergency, and within the capacity to ensure there are adequate washroom facilities available,⁵ as examples. Building facilities and systems, such as illumination, heating, air-conditioning, and ventilation, would need to be able to accommodate extended periods of occupancy. This would typically be managed with reprogramming systems and not considered as an alteration to the systems (triggering the application of the Building Code), but if new systems were to be installed then their installation would need to conform to the Building Code. **Adjusting the program to the limitations of the space could be much easier than renovating the space to accommodate the program.** For example, if only certain portions of the school are going to be used for before and after school programs and the other portions are going to be cordoned off, the spaces in use need to be those that provide the required evacuation routes and accessible path of travel. If a required evacuation route or an accessible path of travel is unavailable during the program times, then a replacement or alternative solution will have to be provided. Many circumstances of existing spaces can be managed by the training of supervisory staff (required by the fire safety plan) so that responsibilities for the fire safety of occupants are clear for those designated individuals.

Other enactments may be applicable if changes are being made. For example, changes to electrical systems must be done in conformance with the Electrical Safety Regulation⁶.

⁵ Routes between the program spaces and washrooms must also be considered such as for accessibility and appropriate illumination.

⁶ The Electrical Safety Regulation does not apply retroactively, meaning existing buildings are not required to renovate each time a new edition gets adopted or revised. The determination of whether the Electrical Safety Regulation applies should be done by a qualified person. For more information, see the [Technical Safety BC website](#).

Appendix A - Definitions

Some Building Code and Fire Code terms used in this bulletin are reproduced for reference. A complete list of defined terms can be found in Article 1.4.1.2. of Division A of each code. Most terms appear identical in both codes although not every term is used by both codes. Terms specific to one code are identified below.

Assembly occupancy (Group A) means the *occupancy* or the use of a *building* or part thereof by a gathering of persons for civic, political, travel, religious, social, educational, recreational or like purposes, or for the consumption of food or drink.

Business and personal services occupancy (Group D) means the *occupancy* or use of a *building* or part thereof for the transaction of business or the rendering or receiving of professional or personal services.

Care means the provision of services other than *treatment* by or through care facility management to residents who require these services because of cognitive, physical or behavioural limitations.

Care occupancy (Group B, Division 3) means the *occupancy* or use of a *building* or part thereof where *care* is provided to residents. (See Note A-1.4.1.2.(1).) [Building Code definition.]

Care Occupancy [Excerpt from Note A-1.4.1.2.(1)]

Support services rendered by or through care facility management refer to services provided by the organization that is responsible for the care for a period exceeding 24 consecutive hours. They do not refer to services provided by residents of dwelling units or suites, or to services arranged directly by residents of dwelling units or suites with outside agencies.

In the context of care occupancies, these services may include a daily assessment of the resident's functioning, awareness of their whereabouts, the making of appointments for residents and reminding them of those appointments, the ability and readiness to intervene if a crisis arises for a resident, supervision in areas of nutrition or medication, and provision of transient medical services. Services may also include activities of daily living such as bathing, dressing, feeding, and assistance in the use of washroom facilities, etc. No actual treatment is provided by or through care facility management.

Occupancy means the use or intended use of a *building* or part thereof for the shelter or support of persons, animals or property.

Supervisory staff means those occupants of a building who have some delegated responsibility for the fire safety of other occupants under the fire safety plan. [Fire Code definition.]

Appendix B – Fire Safety Planning

Existing schools should already have a fire safety plan in place, which will also include the fire drill procedures required by the Fire Code for the school.

The Fire Code requires that the fire safety plan be reviewed at intervals not greater than 12 months to ensure that it takes account of changes in the use and other characteristics of the building; it is expected that the plan will be updated whenever there are changes to the supervisory staff so that they are aware of the plan, and whenever there are approved site specific changes, such as the means of egress, for example when areas of the school are permitted by the authority having jurisdiction (local fire inspector) to be partitioned off to prevent access to certain parts of the school.

The owner or the owner's authorized agent is responsible for carrying out the provisions of the Fire Code which includes establishing a fire safety plan to ensure that:

- fire hazards will be controlled,
- emergency responders will be notified of a fire emergency,
- emergency responders will not be delayed in carrying out their duties,
- firefighting operations will be managed effectively, without unnecessary delays,
- designated supervisory staff⁷ will be appointed and organized to respond to fire emergencies,
- instructions including schematic diagrams describing the type, location and operation of building fire emergency systems will be established, and
- building facilities, systems, equipment and devices will be properly inspected and maintained.

The fire safety plan not only reflects the unique characteristics of the building but also considers the available firefighting infrastructure. For this reason, the fire safety plan must be prepared by the owner or owner's authorized agent in cooperation with the local fire department and other applicable regulatory authorities.

It is important that the owner or owners authorized agent know they are responsible for:

- ensuring they are also in compliance with laws and regulations applicable within British Columbia and the local jurisdiction and consult the local fire department and other

⁷ Supervisory staff include any occupants with a delegated responsibility for the fire safety of other occupants and would include any third-party operators with a delegated responsibility.

regulatory authorities such as the local health authority, Technical Safety BC and WorkSafeBC, and

- fire safety planning and risk management assessments of the site which are essential to prepare for and manage fire hazards; planning and assessment will identify and lead to methods and processes that will minimize or contain potential fire hazards – all site safety activities should be coordinated through the planning and assessment process.

The Fire Code provisions form part of the fire safety plan and are applied depending on the circumstances at the site, such as the size and use of the building.