

Introduction

In 2017 FPC the Fresh Produce Consortium published the first edition of 'FPC Guidance on provision of caravan accommodation for temporary workers in the UK', having recognised the need to provide guidance for members and others. Since then, this guidance has been reviewed and updated. This is the fifth edition of the guidance and is published following an appraisal carried out by the Accommodation Review Group and issue to a wider stakeholder group for final commentary. A list of Review Group Members and the wider stakeholder group is provided in Appendix 6.

The Review Group recognises that there is a range of accommodation available in the UK and the scope of this guidance covers not just caravans but also on other types of temporary accommodation units, such as portacabins, bunkabins and pods. Much of the guidance is generic and relevant to all types of units, and any specific differences will be highlighted in the guidance and its checklist where appropriate.

Whilst some aspects of temporary worker accommodation may be covered adequately by legislative requirements, there are significant elements which are not. Where this is the case, the industry benefits from sharing good practice to ensure that workers employed in our industry live not only in a safe environment that complies with regulatory requirements, but one which is also acceptable in terms of comfort, security, and personal safety.

This guidance is intended to cover England, Northern Ireland, Scotland, and Wales. Any legislation specific to the devolved administrations is included and should be taken account of where appropriate.

This guidance is not intended to be interpreted as being an industry standard for temporary accommodation units and we welcome comments from FPC members and other organisations on developing this guidance further on behalf of the UK fresh produce industry. Our intention is that this guidance should set out what is legally required, what makes good practice and identify aspects where the industry can work together to improve conditions for temporary workers.

The guidance includes a self-assessment checklist (available as a pdf and electronically through a QRCode provided) which is intended to be used by growers to assess the status of their accommodation against the benchmark indicators which include regulatory requirements and recommendations of good practice.

If you would like to provide feedback, please email: kshields@freshproduce.org.uk.

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Summary of Changes from 4th to 5th Edition

There has been a significant restructuring of the Guidance document from the previous Edition with many of the legislative references updated. As so much of the content and structure has been revised, the details of individual changes have not been listed specifically.

The main changes include the Fire Safety guidance which has been expanded in line with updated legislative requirements. There has also been additional guidance on personal safety and Equality considerations. All existing Accommodation guidance from other sources have been referenced in the Appendices.

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The information contained in this publication is given by way of comment and general guidance and does not constitute legal advice. Circumstances may differ and detailed legal advice should be obtained before acting upon it. The Fresh Produce Consortium cannot accept responsibility for any errors or omissions or for any loss occasioned to any person or body acting or refraining from acting on the basis of any material contained in this publication. © Fresh Produce Consortium 2023.

Scope of the Guidance

This guidance focuses on the provision of temporary accommodation for seasonal workers, including **caravans, bunkabins, pods and portacabins**. These accommodation units may be self-contained with sleeping, sanitary and cooking facilities, or there may be separate communal facilities provided such as a kitchen or toilet block.

A caravan is defined under legislation as "*any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted*".

A three-part test has been developed by the courts to determine what is a caravan for planning purposes: construction, mobility, and size. **Therefore, for the purposes of planning, the definition includes other types of temporary accommodation units such as bunkabins, pods and portacabins.**



Bunkabin Type accommodation



Caravan and portacabin type accommodation

FPC Guidance on provision of temporary accommodation units for workers in the UK

There are no comprehensive national or international regulations relating specifically to workers' temporary accommodation or for units used as temporary accommodation. However, regulatory requirements covering health and safety, water supply, environment, personal and fire safety must be met for all types of accommodation.

General legislative requirements are covered in Section 1 under the following:

- Planning, Licencing and Caravan Specific legislation
- Accommodation provider/ Rental legislation
- Employment and Accommodation
- General Considerations – Equality Act

Specific legislative requirements are covered in Section 2 when accommodation is considered in further detail:

- Public and Private Water Supplies
- Fire Safety
- Gas and Electrical Installation Safety
- First Aid and Health and Safety
- Environmental Protection
- Specific considerations – Equality Act

Section 1 – Accommodation Planning and Licence Agreements

1.1 Planning Permission and Site Licensing Requirements

There should be a member of staff designated as responsible for ensuring that the necessary planning permission and licensing requirements are met. **Site owners MUST check with their local authority whether they require any planning permission and whether they must obtain a caravan site licence.**

Caravan sites are required by law to obtain a licence from local authorities and in some cases, planning permission before they can operate. Guidance can be found in Appendix 1.

It is important to note that Planning Permission and licensing regulation varies according to the country of implementation as devolved nations may have different requirements. In addition, additional local authority by laws may apply to specific caravan sites.

England Guidance

[Caravan site licence - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Scotland Guidance

[Chapter 11 - Exemptions - Licensing system for mobile home sites with permanent workers: guidance for local authorities - gov.scot \(www.gov.scot\)](http://www.gov.scot)

The Caravan Sites and Control of Development Act 1960 in the UK:

- Makes it an offence to operate a caravan site without a license or breach license conditions.
- Gives local authorities the ability to revoke or refuse renewal of licenses if conditions are not met.
- Allow authorities to charge fees for license applications and annual fees based on site sizes.
- Gives local authorities enforcement and prosecution powers for offenses under the Act.
- Make it an offense for utilities like electricity and water suppliers to connect to unlicensed sites.
- Requires sites to keep a register of occupants and give inspection access to authorities.

There are some exemptions:

- Exempts from land occupiers from needing a licence e.g., for up to 3 caravans occupied by them or their workers.
- Prohibits caravan parking on common land without consent from authorities.

As part of [The Town and Country Planning \(General Permitted Development etc.\) \(England\) \(Amendment\) Order 2023 \(legislation.gov.uk\)](http://legislation.gov.uk) – there is Seasonal Worker Exemption for planning permission which exempts the developer / accommodation provider from licence requirements and planning permission if caravans are provided on a temporary basis for the duration of the season. However, units must be removed at the end of the season and there can be no hard standing.

Accommodation providers should be aware of the requirements of licensing for Housing of Multiple Occupancy - [The Licensing and Management of Houses in Multiple Occupation and Other Houses \(Miscellaneous Provisions\) \(England\) Regulations 2006 \(legislation.gov.uk\)](http://legislation.gov.uk) – as this may be of relevance for certain accommodation facilities.

FPC Guidance on provision of temporary accommodation units for workers in the UK

Planning permission may depend on the type of site and duration of use – for example, there may be exemptions based on the number of units and type of workers or type of business and removal of units. However, in practice, it is more likely that planning permission will be required.

Site owners should take account of any alterations made to their site, for example, changing the type of units and their locations, and where units such as pods are clipped together. This can also impact potentially on planning restrictions as well as health & safety and environmental protections. Supporting facilities, such as communal rooms, separate kitchen, shower, and toilet blocks may also require an application for planning permission.

Individual local authorities may attach conditions regarding their interpretation of requirements on the following:

- Density and space between caravans and other types of temporary accommodation units.
- Roads, footpaths, and hard standings
- Drainage, sanitation and washing facilities.
- Water supply.
- Refuse disposal.
- Firefighting appliances: fire points; firefighting equipment; fire warning; maintenance; fire notices; fire hazards; note on fire hydrant; telephones.
- Storage of liquefied petroleum gas.
- Electric installations.
- Storage space.
- Car parking.
- Recreation space.

Whilst this guidance provides advice and recommendations on the above elements in the following section, you must always ensure you meet the requirements of your local planning authority. The legal requirements may differ case by case, depending on the source country, the characteristics of use, the site's planning history and the law.

1.2 Accommodation Licence and Occupancy Agreements

Accommodation Licence or Letting Agreements are commonly used for facilities provided with employment rather than traditional tenant / landlord agreements . A licence agreement provides a person the right to use or occupy a property without acquiring the rights of a tenant and this may be more appropriate for short term or temporary occupancy. There may be varying requirements according to the source country.

There should be a member of staff designated as responsible for ensuring that all workers are aware of their rights and responsibilities with regards to accommodation provision. This should be communicated in a language that can be understood and there is written evidence of the agreement signed by both parties.

All workers must be provided with a legal, clear, and fair agreement from the organisation responsible for providing the accommodation. An example of a Model Licence Agreement for Shared Accommodation is provided to Association of Labour Providers members in ALP Brief 172 - [Association of Labour Providers - Model Licence](#)

Any agreement should include:

- the names of all people involved.
- the property address.
- the rental price and how it's paid – considering any deductions and clear calculations.
- what is included in the rental price?
- if deposits are required (although this is generally not considered appropriate)
- details of action that will be taken in the event of accidental or wilful damage.
- the start and end date of the occupancy
- any occupant or accommodation provider obligations – such as the requirement for accommodation inspections
- an outline of bills the occupier will be responsible for
- whether the agreement can be ended early, or extended, and how this can be done.

The [Homes \(Fitness for Human Habitation\) Act 2018](#) ('the Act') came into force on 20 March 2019. It is designed to ensure that all rented accommodation is fit for human habitation and to strengthen tenants' means of redress against the minority of landlords who do not fulfil their legal obligations to keep their properties safe. However, this Act is intended to cover 'tenants' and does not cover people who have 'licences to occupy'. This also only applies to businesses in England and Wales.

It should be considered how long the occupant may remain in the accommodation after the period of employment has ended. This should be agreed in advance and written clearly into any agreement or contract. This period of occupation may vary dependent upon the reasons for the employment terminating – e.g., if end of season compared to the occupant being dismissed or choosing to leave. This may also be relevant for periods of occupation prior to any employment period starting.

Legislative and reference links and guidance can be found in Appendix 1.

1.3 Accommodation and utilities – charges to workers

Employers and landlords should be aware of their responsibilities relating to how pay and accommodation may be linked.

Accommodation provided by an employer can be taken into account when calculating the National Minimum Wage or National Living Wage. Accommodation costs count towards the National Minimum Wage or National Living Wage, even if the worker does not have to use the accommodation to do the job. If the accommodation is optional, it only counts as a cost if the worker uses it.

No other kind of company benefit (such as food, a car, childcare vouchers) counts towards the minimum wage.

Accommodation offset rates are set by the Government in April each year and may be daily or weekly. There is guidance that should be followed to ensure that wages are calculated correctly

when provided accommodation. The National Minimum Wage Offset Guidance can be found here along with example calculations : [National Minimum Wage and Living Wage: accommodation](#)

1.4 Equality Legislation

When planning and providing accommodation, it is important that accommodation providers are aware of their responsibilities and respect the rights of their occupants.

The Equality Act 2010 is a law that protects people against discrimination, harassment, or victimisation in employment, and as users of private and public services based on nine protected characteristics. These characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Useful guidance on general principles of rights in relation to equality is outlined in the [Equality Act 2010 \(legislation.gov.uk\)](#). A more easily interpreted guidance is issued by ACAS - [Discrimination and the Equality Act 2010 - Discrimination at work - Acas](#)

Section 2 – Specific Site Requirements

2.1 Site Management

2.1.1 Rights and Responsibilities

A written management plan should be in place including management policies or plans on health and safety, security, living conditions, workers' rights and representation, relationships with the local community and grievance processes.

There is a combination of responsibilities held between the company, site manager, any contractor, and the workers.

The site manager will be responsible for overseeing workers, ensuring the implementation of accommodation standards and for the implementation of the management plan. It is important that the manager is suitably experienced and competent, with the corresponding authority, to carry out his/her role.

If the facility is being managed by a contractor, the standards should be specified in the contract and mechanisms put in place to ensure that they are implemented. There should be clear contractual management responsibilities, monitoring, and reporting requirements. It is the responsibility of the business/grower who is working with the contractor to ensure that all conditions of accommodation are being monitored and meet the necessary requirements.

The company in charge of managing the accommodation should have the prime responsibility for ensuring the workers' physical well-being and safety. This involves making sure that facilities are kept in good condition (e.g., respecting sanitary standards and fire regulations), as outlined in this guidance, and that adequate health and safety plans and standards are designed and implemented. A pest control plan should be in place with regular inspection of the site and units and any follow up steps taken to eradicate pests by a suitably qualified person.

An induction should be provided for workers regarding health and safety requirements, fire safety and hygiene standards. Names of contacts as well as emergency contact numbers must be provided and kept up to date. A register of workers should be maintained by the site manager, with information on next of kin and emergency contacts and any relevant medical information (e.g., allergies).

2.1.2 Workers' rights and information

Terms and conditions of employment will be set by the contract between the employer and worker. Any rules relating to accommodation should be reasonable and non-discriminatory, respecting workers' gender and religious, cultural, and social backgrounds. Wherever possible workers should be given a choice about with whom they share any facilities, considering differences in cultural and social backgrounds and offering single sex accommodation. If workers are experiencing any issues regarding discrimination for whatever reason, then they should have the means to report this in confidence directly to the site manager.

It is good practice to provide some information on support networks as well as other organisations which could provide help to workers, for example, website addresses and contacts for organisations which support issues in discrimination, mental health, nutrition, and skills development. This information should be displayed in common areas and be available from the site manager on request. See Appendix 2 for examples of national support networks.

Site managers should take into consideration the need to respect workers' privacy and balance this alongside the need to maintain health and safety requirements, fire safety and hygiene standards.

2.1.3 Reporting issues

It is important that workers know that they can raise issues regarding their accommodation. Processes and mechanisms for workers to report any issues should be well publicised and communicated in, e.g., in a prominent place on notice boards in communal areas, to workers in their first language and English. It is considered good practice to involve workers in establishing such a mechanism. The mechanism in place should not only provide a direct link to the site/farm manager, but also a clear feedback loop to ensure that workers are kept informed. The chosen process could be shared with workers, for example on notice boards or leaflets. This information should be communicated clearly to all workers as part of their induction.

Workers should have access to a procedure for handling grievances which is communicated as part of their induction.

2.1.4 Carrying out a specific site risk assessment

It is vital that a risk assessment is carried out prior to the accommodation being provided and then on an ongoing (annual) basis, or in the event of issues occurring.

This risk assessment will need to consider the specific features of your site and all temporary accommodation units provided within it. This protects your occupants from harm if control measures are identified for hazards, implemented, maintained, and checked and may also protect your business in the event of any recourse.

Where accommodation is located within or next to local communities it is good practice to design a community relations management plan to manage any potential impacts. This plan could consider: impact on local employment; infrastructures e.g., roads, transport, telecommunications, water sanitisation, health care; social and cultural cohesion.

The following hazards may be applicable for both the external site and within the accommodation:

- Overhead risks, e.g., Trees, overhead cables
- Traffic / personnel movement around site
- Access for emergency vehicles
- Access in and out for personnel
- Contact with hazardous chemicals - vicinity to pesticides including spray drift, fuel tanks etc
- Noxious gases

- Composting leachate
- Flood / sewage overflow risk
- Personal safety / safeguarding
- Noise / Light pollution
- Slips / trips / falls - areas around accommodation
- Ponds / Water courses
- Fire and smoke risk
- Water quality
- Legionella risk
- Electrical safety
- Gas safety
- Food waste / rubbish build up
- Pest ingress
- Mould risks
- Hygienic provision of food storage (fridge / freezers)
- First aid - access to first aid / first aiders

Risk assessments can be site wide and cover a range of hazards, or there can be separate specific ones for detailed requirements such as fire, legionella, movement around site, flood etc. It is possible to enlist health and safety or specialist consultants to support you. The Health and Safety Executive have generic risk assessment templates that can be used: [Risk assessment: Template and examples - HSE](#)

There is also a risk-based evaluation tool - [Housing Health & Safety Tool](#) - to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It was introduced under the Housing Act 2004 and applies to properties in England and Wales. Whilst this does not apply specifically to temporary accommodation, it can be used as a guidance to identify hazards.

More information relating to risk assessment can be found in Appendix 3.

2.1.5 Site and Facility Checks

Once a robust risk assessment is in place, it is the responsibility of the provider of the accommodation to ensure the site and all units, sanitary, cooking, and communal facilities are in good condition (internally and structurally), meet all legislative requirements and facility checks are scheduled.

The schedule must be realistic to ensure a satisfactory check of number of units (i.e., sites with 20+ units may schedule checks in groups across a week)

As a minimum, it is recommended that a representative sample of accommodation units (based on risk assessment) has a fortnightly check.

It is recommended that checks are performed at different times of working and non-working days to ensure that the checks reflect the varying demands of the site.

If access is required to workers accommodation, good practice is to seek agreement with the worker. Worker privacy must be respected and permission for access sought, however, if there is

reason to believe that there are issues, or if access is consistently denied, then it may be necessary to access the property without permission. It is recommended that all workers are made aware of the need for inspections to take place within their accommodation within any employment or accommodation contracts.

Checks should also include accommodation that is not currently in use to ensure that mould formation or pest ingress has not become a problem whilst unoccupied.

Findings and any actions as a result of the checks should be logged:

- Actions for occupants: to be notified through payslips, direct communication, e.g., text and confirmed as received. Timescales for improvement should be provided and actions followed up by re-inspection.
- Actions for maintenance: to be logged, target date, commentary, and completion date by the accommodation providers.

An example of site and facility check can be found in Appendix 4

2.2 External Site Standards

2.2.1 Location

Accommodation location should avoid health and safety hazards such as:-

- Road accessed by heavy vehicles such as HGV / Tractors (noise abatement & risk of injury)
- Electrical substations / control panels (Fire / Electrocutation)
- Proximity of farmyard / packhouse (pesticide use and storage / noise / light abatement / especially if situated in or near a business that runs throughout the night)
- Flood / accumulation of stagnant water - The [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/flood-map-for-planning.service.gov.uk) will indicate if the site is in an area for potential flooding (disease control)
- Wastewater & drainage should be compliant with relevant building regulations and where appropriate approved by local authorities (disease control)
- Activities of surrounding businesses if applicable (pesticide application / noise)
- Ease of access for workers to be able to walk to their place of work, if transport required to and from place of work (risk of Road Traffic Accident involving a pedestrian)
- Proximity to food waste and rubbish (pest ingress)
- Location of ponds or reservoirs near accommodation or routes of pedestrian travel.

2.2.2 Access

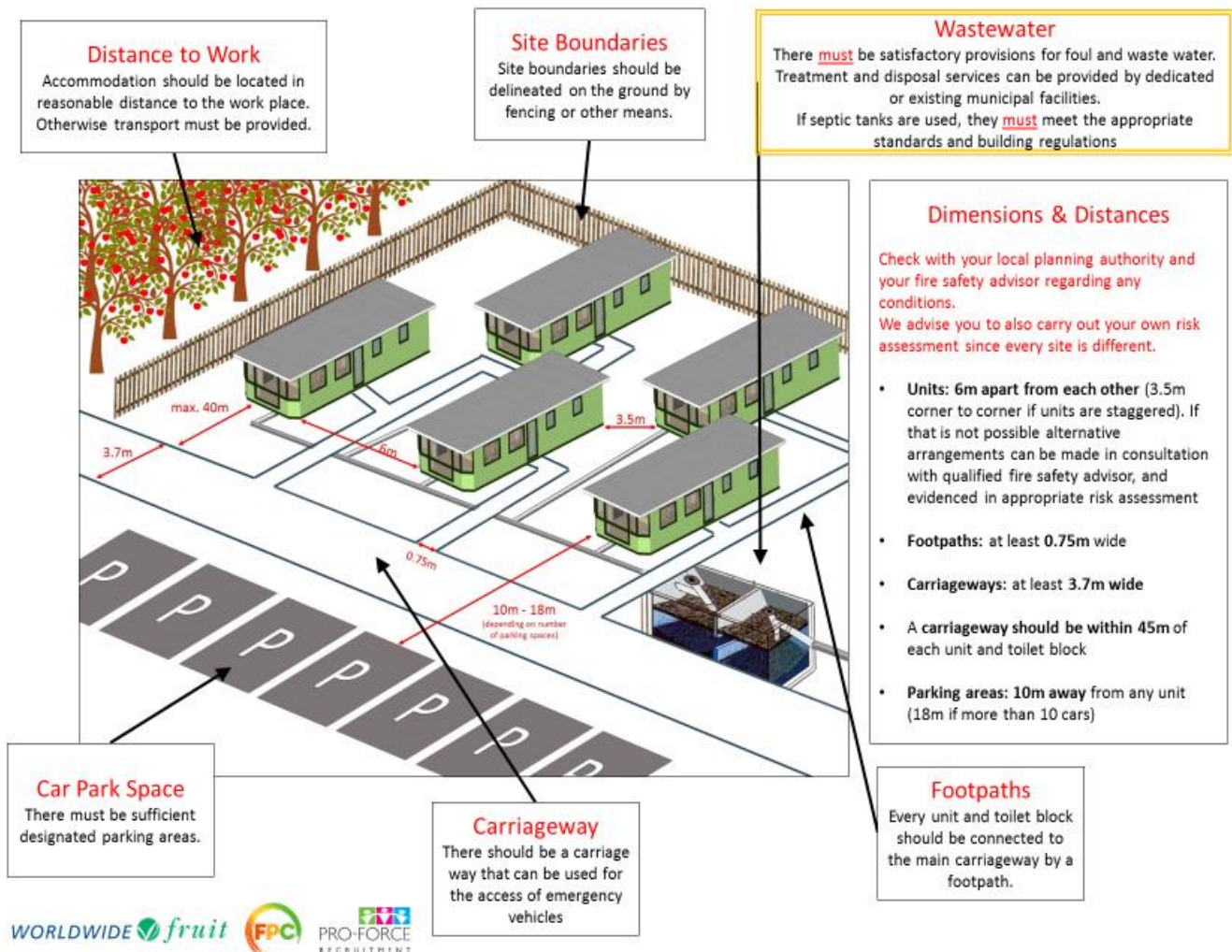
- Pathways around the site should be clearly lit and well maintained to avoid injury.
- Emergency vehicle routes should be well defined and clear of obstruction.
- Gateways to site should have a minimum of 3.2 metres* wide with a 3.7-metre-high clearance*
- Carriageway should be at least 3.7 metres wide* and be within 45* metres of all unit toilet blocks.

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- No unit shall be stationed within 6 metres of any public road or within 6 metres of another unit (3.5 metres corner to corner* if units are staggered). If this is not possible, alternative arrangements can be made in consultation with qualified fire safety advisor and evidenced in an appropriate risk assessment.
- Toilet blocks should be connected to the main carriageway by a footpath at least 0.75 metres wider* and surfaced with a suitable material.
- Pedestrian & traffic routes should be marked to ensure the safety of workers.
- Overhead cables across roads should be at least 5.8 metres high.
 - Warning notices should be displayed if overhead electrical lines are a risk, there should be notices at the main entrance and on any line supports.

*This follows advice provided by the British Holiday & Home Parks Association and the Caravan and Motorhome Club.

Figure: 1 – Site Schematic showing recommended measurements



2.2.3 Boundaries

- Site boundaries should be delineated on the ground by fences or by other means.

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- Where trees are present on site there should be maintained, particularly where trees are close to units and branches could overhang units.
- The position of the units in relation to any public road and spacing between the units should be based upon consultation with a qualified fire safety professional and evidence with the appropriate risk assessment.

2.2.4 Parking

- Good practice is NOT to park next to the unit:-
 - Designated parking areas should be sufficient (<11 cars minimum 10 metres away from units or > 10 cars minimum of 18 metres away)
 - Consider locating appropriate fire extinguisher and oil spillage kit next to car parking area.
- Parking may be permitted next to a unit, but consideration should be given to the proximity to other units and to gas supply (where applicable)

2.3 Internal Accommodation Standards

Accommodation must allow the well-being and safety of an individual. As a minimum, a worker should be provided with an area to sleep, to wash and shower, to cook and eat, to rest and relax – such as a communal area. Accommodation must be provided to an individual in a clean, weather and pest-proofed condition with appropriate safety considerations.

There should be a member of staff designated as responsible for all accommodation areas with a nominated deputy. These areas should be included in risk assessments and facility checks.

There are a range of existing guidance documents that are in place for seasonal worker or agricultural accommodation standards – below reflects these requirements as well as going into further detail of what can be done in relation to best practice. For a summary of the existing guidance, see Appendix 5.

2.3.1 Living Arrangements

The site must have a register of which worker occupies each accommodation unit and be updated regularly.

Men and women must not be required to share sleeping accommodation areas unless they are a couple. Best practice would be to have single sex accommodation where possible for personal safety protections.

The number of occupants must not exceed the number of beds provided. Workers must not be expected to sleep on settees or floors.

Where it is not possible to provide a separate bedroom for occupants, they must be informed prior to committing to the job that they may be required to share a room via a farm recruitment pack or as part of a licence agreement.

The site must consider nationality and religion when planning unit occupancy – keeping together those of the same nationality can help new starters to settle in. Cultural awareness should be taken into consideration where there may be reasons for conflict.

2.3.2 Bedrooms

A separate bed for each worker must provide and ‘hot bedding’ (staff moving between beds or sharing beds at differing times) is not permitted. Bunk beds are not encouraged due to access issues and the risk of increasing occupancy numbers beyond the capacity of the accommodation.

Bedroom sizes must be assessed to determine suitable occupancy numbers e.g., twin room sizes **may not** prove suitable for two adults - the space between the beds must be sufficient to access each bed position comfortably.

Each worker must be provided with a mattress and bed frame as a minimum. Workers must be advised in the recruitment pack or occupancy agreement whether they should bring their own pillow, cover, and bedding or if the employer can provide (e.g., at a cost).

Single beds shall be a minimum of 1800mm long x 600mm wide x 150mm deep and beds provided should be large enough for a member of staff to sleep comfortably. Beds with dimensions smaller than above are usually intended for use by a child and are not suitable for adults. Double beds, where provided for couples, must be large enough to comfortably sleep two adults.

Mattresses and bedding (if provided) must be appropriately clean for each worker at the start of their occupancy. Mattress protectors should be provided if mattresses cannot be adequately cleaned for hygiene reasons.

There should be the facility to be able to wash and dry bedding as required.

There must be mobile partitions or curtains to ensure privacy at windows. The condition of these should be checked before occupancy and cleaned / replaced where dirty / holes in material.

Facilities for the storage of personal belongings for workers should be provided. There should be space to store a suitcase (typically under the bed or in a central store) and to store clothes in an easily accessible location, preferably close to the sleeping areas.

Staff may feel more secure with a lock on their bedroom door and this request should be considered and granted accordingly. Due regard should be given in the site risk assessment to consider both personal safety but also evacuation issues in the event of a fire if locks are provided.

Bedrooms should have a plug socket, light source, and a heating source (all of which do not pose a risk to fire or electrical safety).

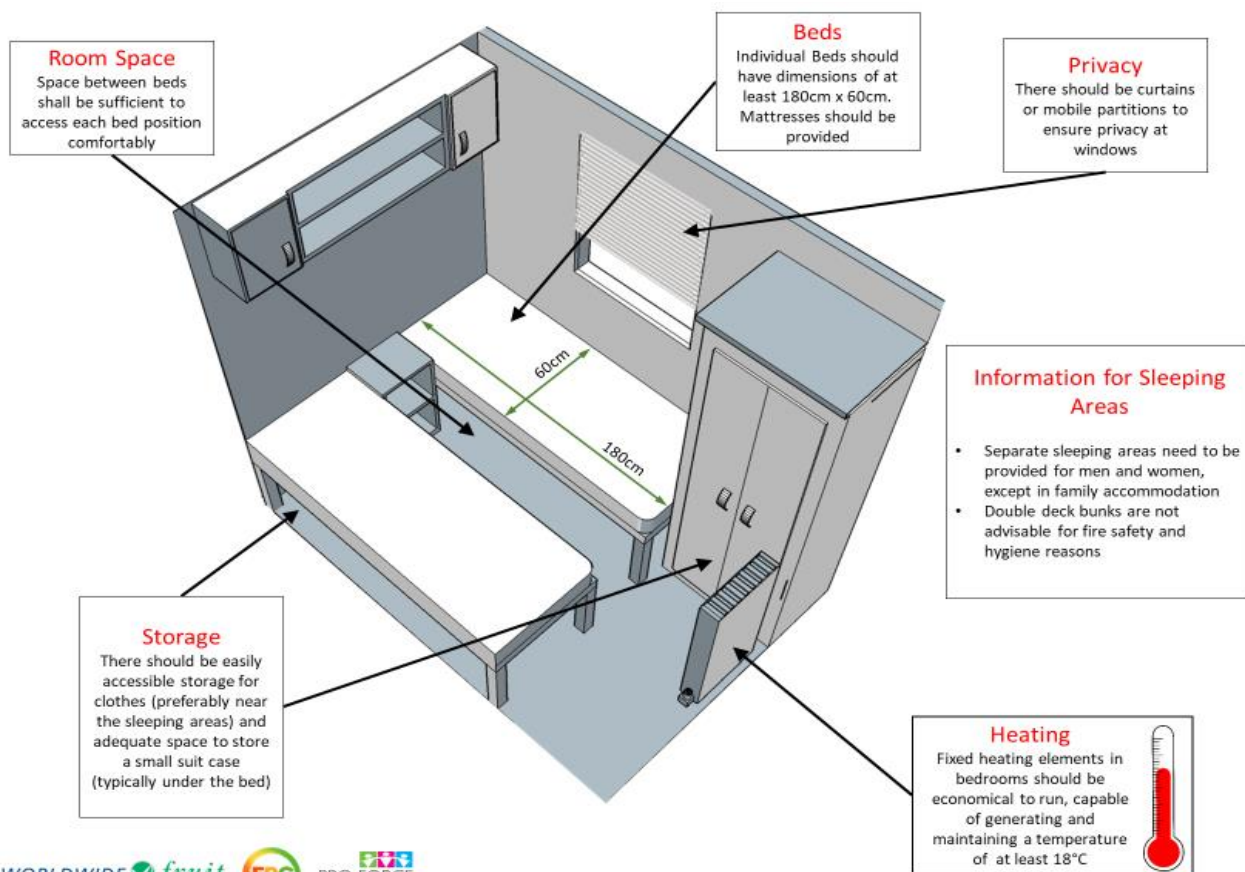


Figure: 2 – Schematic plan for sleeping area

2.3.3 Heating, lighting, and ventilation

The accommodation must be kept wind and watertight and be in good repair. Precautions should be in place to protect against frost in the winter months to ensure that the unit is comfortable and that sanitary and toilet facilities function correctly.

Heating and ventilation should be appropriate for the climatic conditions and time of year of occupancy. Units which are occupied for a few weeks in the summer will not have the same heating and ventilation requirements as units occupied during winter months for example.

Accommodation providers must ensure that the accommodation they provide is free from serious hazards, including damp and mould, and that homes are fit for habitation. Cases of damp and mould must be treated with the utmost seriousness as damp and mould primarily affect the airways and lungs, but they can also affect the eyes and skin. The respiratory effects of damp and mould can cause serious illness and, in the most severe cases, death.

The following areas are particularly prone to condensation:

- cold surfaces such as mirrors, windows, and window frames

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- kitchens and bathrooms where a lot of steam is created.
- external walls, walls of unheated rooms and cold corners of rooms
- wardrobes/cupboards and behind furniture against an external wall and a lack of ventilation

Guidance can be found here: [Can damp and mould affect my health? - NHS \(www.nhs.uk\)](https://www.nhs.uk) and [Repairs - damp - Citizens Advice.](#)

[Understanding and addressing the health risks of damp and mould in the home - GOV.UK \(www.gov.uk\)](https://www.gov.uk) (applies to England only)

Useful guidance for workers to avoid the formation of mould can be found in the leaflet: [Dealing with damp and condensation - National Energy Action leaflet - National Energy Action \(NEA\)](#)

Heating must be adequate and economical to run. As a recommendation, appliances should be designed to be capable of raising and maintaining the temperature in areas when occupied by workers to the indoor temperature of at least 18°C (recommended by Public Health England 'The Cold Weather Plan for England: Protecting health and reducing harm from cold weather' October 2018).

Guidance can also be found relating to signs of cold stress which can apply to accommodation provision. [HSE advice on working in cold and signs of cold stress](#)

It is possible that workers may be working at times when summer temperatures are very high. They may then be in accommodation which can be difficult to cool quickly and easily. Risk assessments should consider both cold and heat stress hazards of caravan accommodation. Guidance can be found relating to signs of heat stress : [HSE advice on working in heat and signs of heat stress](#) and [Heat Stress Check List \(hse.gov.uk\)](#)

Adequate ventilation should be provided for all rooms by a window or mechanical ventilation. Permanent ventilation should be provided in rooms with gas heating appliances.

Both natural and artificial lighting should be provided and maintained. It is best practice that the window area represents not less than 5% to 10% of the floor area.

Lighting in bedroom areas should be 100 lux as a minimum.

2.3.4 Sanitary and toilet facilities

Sanitary facilities include toilets, urinals, washbasins, and showers. These may be within the caravan unit or as a separate facility. Suitable lighting must be provided – as a guide 100lux in changing rooms and toilets.

All facilities must be kept clean and in fully working condition. Facilities should be easily cleanable, and provision made for these to be cleaned on a regular, specified basis – either by the workers themselves or by designated cleaning staff. Standards and provision of cleaning materials should be checked during facility checks.

Showers

- Shower/bathroom facilities must be provided with a constant supply of cold and hot running water.
- Adequate privacy should be ensured, including lockable doors.
- Adequate drying/changing space should be available.
- Shower facilities and related plumbing must be designed, installed, cleaned, disinfected, and managed. A testing regime should include flushing prior to the start of the season and during the season.
- Any non-mains stored water (non-potable) facility should be tested in accordance with the [Health and Safety Commission's Approved Code of Practice 'Legionnaires disease: the control of legionella bacteria in water systems' ISBN 978 0717 617722](#). The management system and risk assessment should include obtaining satisfactory sample results from a UKAS accredited laboratory before the showers are first used or at the start of each season and thereafter in accordance with the requirements of the site risk assessment.
- An adequate number of shower/bathroom facilities should be provided to cover times of peak demand based on a risk assessment. In practice one shower to 10 persons is recommended by BHHPA.
- In communal areas there should be segregation of male/female showers.
- There should be lockable doors on individual shower cubicles, as opposed to curtains, in communal areas to ensure personal safety.
- Flooring for showers should be of an anti-slip hard washable material.
- Unless adequate natural ventilation is provided, shower/bathrooms must be ventilated to prevent build-up of condensation and mould, in accordance with Building Regulations. Mould can be hazardous to health and therefore instructions must be provided to occupants to ensure that condensation does not build up. This may include the opening of windows if extraction or ventilation is insufficient.

Toilets

- An adequate number of toilets should be provided for workers to provide privacy based on a risk assessment. Six berth caravans may have only one toilet which is acceptable but if toilets are shared by more than 6 people, then separate male and female facilities should be provided.
- Toilet facilities should be conveniently located and easily accessible. A recommendation is for the location of toilet facilities to be less than 90 metres* from accommodation units where separate communal facilities are provided, and from 30 to 60 metres* from rooms.
- Toilets must be ventilated by natural or mechanical means and be accessible without any individual having to pass through any sleeping room in a unit.
- Women's facilities should have provision for hygienic disposal of sanitary dressings and there should be a contract or management system to empty and clean disposal units.
- **This follows advice provided by [the British Holiday & Home Parks Association](#) and the [Caravan and Motorhome Club](#). If this is not achievable, then other arrangements may be made, in consultation with a qualified fire safety professional and evidenced with the appropriate risk assessment.*

Handwash Facilities

- An adequate number of hand wash facilities should be provided based on a risk assessment. The British Holiday & Home Parks Association (BHHPA) advises one unit to each 10 persons.
- Hand wash facilities should consist of a tap providing hot water, a basin, soap (in communal areas) and a hygienic means of drying hands.

Figure: 3 – Schematic plan for communal toilet facilities

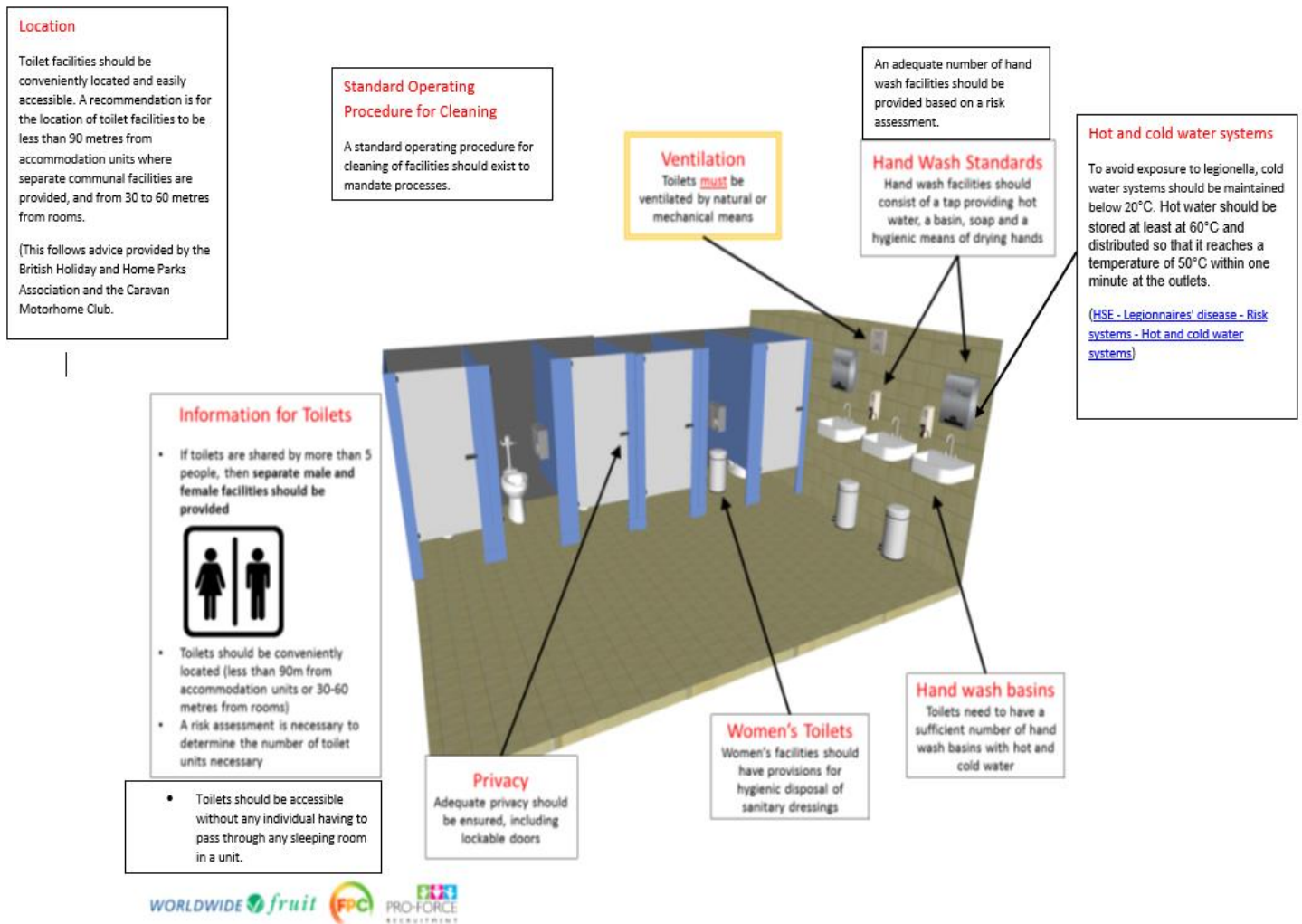



Figure: 4 – Example of Shower Block



Privacy

- In communal facilities, male and female showers should be segregated
- Shower facilities must have adequate privacy through either doors or curtain
- Adequate drying/changing space should be available

Ventilation

Unless adequate natural ventilation is provided, shower/bathrooms must be ventilated to prevent build-up of condensation and mould, in accordance with Building Regulations

Standard Operating Procedure for Cleaning

A standard operating procedure for cleaning of facilities should exist to mandate processes.

This should include a testing routine to flush prior to the start of the season and during the season.

Hot and cold water systems

Shower facilities should be provided with a constant supply of hot and cold running water.

To avoid exposure to legionella, cold water systems should be maintained below 20°C. Hot water should be stored at least at 60°C and distributed so that it reaches a temperature of 50°C within one minute at the outlets.

[\(HSE - Legionnaires' disease - Risk systems - Hot and cold water systems\)](#)

The management system and risk assessment should include obtaining satisfactory sample results from a UKAS accredited laboratory before the showers are first used or at the start of each season and thereafter in accordance with requirements of the site risk assessment.

Information for Showers

An adequate number of shower/bathroom facilities should be provided to cover times of peak demand based on a risk assessment. In practice, one unit to 10 persons is recommended by British Holiday and Home Parks Association.

Design

Shower facilities and related plumbing must be designed, installed, cleaned, disinfected and managed.

Flooring for showers should be on an anti-slip, hard, washable material.

2.3.5 Laundry Facilities

If a launderette is further than one mile away from the site, adequate facilities for washing and drying clothes should be provided (based on a risk assessment) or alternatively a laundry service may be provided.

Adequate drying facilities will vary depending on the geographical location of the site and the time of year of occupancy.

Facilities will need to be able to cope with demand at peak times, e.g., return of workers following completion of shifts.

Facilities can range from providing sinks or tubs with hot and cold water, cleaning soap and drying rooms to providing washing machines (domestic or industrial) and dryers.

If you provide washing machines and dryers, one washing machine and one tumble dryer per 12 people is good practice. However, it is recognised that this may not be achievable currently and it is recognised that the present ratio is on average one washing machine/tumble dryer per 20 people.

Ventilation in washing and drying areas is important to consider avoiding the formation of mould and the subsequent risks to health.

2.3.6 Cooking facilities

It should be considered that cooking in caravans can create condensation during winter months when the outside temperature can be cold, and the inside temperature is warm. This poses a particular risk of mould formation which can be hazardous to health.

Occupants have a duty to ensure that they follow all instructions provided to ensure that mould formation is minimised. This may include opening windows when cooking or keeping temperatures at an appropriate level in the caravan to avoid fluctuation and condensation build up.

- Wall surfaces adjacent to cooking areas are made of fire-resistant materials.
- There should be adequate natural or mechanical ventilation.
- Adequate facilities for cleaning and storage of cooking utensils and equipment are provided.
- Sealable containers should be provided for kitchen/general waste and checks should be made to ensure that waste is not accumulating.
- Sufficient space for the preparation of food and eating should be provided, and should conform to hygiene and safety requirements, including protection against contamination between and during food preparation.
- There must be sufficient space for dry storage of food based on a risk assessment.
- There must be sufficient refrigerated space for food based on a risk assessment, with a maximum temperature of 5°C.

In the cooking unit:

- Based on a risk assessment, adequate cooking facilities should be provided. This should ideally be a cooker and a microwave. The cooker should have a minimum of 2 burners/hobs and be located in a safe position away from doorways.

For a single unit, a sink with hot and cold potable water, connected to a suitable drainage system, should be provided, with materials for hygienic drying.

In a communal kitchen:

- The cooking area for workers should be separate from sleeping areas. Toilets and bathrooms should not be accessed directly from a kitchen.

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- In communal kitchens an appropriate combination of oven, grill, and microwave) should be provided for up to 5 people, with double bowled sink and drainer, or single sink and drainer (up to 10 people).
- In communal areas a heat detector should be located in the cooking area.
- A fire blanket and fire door should be installed based on professional advice from Fire Service or advisor.
- Lighting should be of sufficient intensity to enable effective cleaning and safe practices. As a guide, this should be 500 lux in food preparation and cooking areas.
- There should be sufficient 13-amp electrical sockets above the work surface for appliances, with dedicated sockets for fridge/microwave/oven.
- Food preparation tables are equipped with a smooth durable non-corrosive washable surface made of non-toxic materials.
- To facilitate easy cleaning, it is good practice that stoves are not sealed against a wall, benches and fixtures are not built into the floor.
- Floor, ceilings and walls, cupboards and other fixtures should be made of easily cleanable materials e.g., laminated board. Provision of adequate freezer space should be considered.
- Where fridges and freezers are provided, they must be capable of achieving and maintain the appropriate food safety limits. Fridges should run consistently at 8C and below (ideally 5C) and freezers at -18C. Checks should be made on fridges and freezers during routine checks to ensure that they are operating effectively. Small thermometers placed in fridges and freezers can allow temperatures to be checked by both workers and providers.

2.4 Services

2.4.1 Potable water

Workers should always have easy access to an adequate, constant supply of potable water.

All water supplies must meet the standards set under the [Water Supply \(Water Quality\) Regulations 2000](#) (for England); or [The Water Supply \(Water Quality\) Regulations 2018](#) (for Wales); or [The Water Supply \(Water Quality\) Regulations \(Northern Ireland\) 2017](#); and [The Public Water Supplies \(Scotland\) Amendment Regulations 2017 \(legislation.gov.uk\)](#)

Where water is supplied by private water supply, e.g. borehole, and is to be used for drinking or any other domestic purpose, the water supply must comply with relevant legislation ([Private Water Supplies Regulations 2016](#) – England); [The Private Water Supplies \(Wales\) Regulations 2017](#); [The Private Water Supplies Regulations \(Northern Ireland\) 2017](#) and [The Water Intended for Human Consumption \(Private Supplies\) \(Scotland\) Regulations 2017](#).

Drinking water must meet UK drinking water standards and be monitored regularly.

Tanks used for the storage of drinking water must be constructed and covered to prevent water becoming polluted or contaminated.

Legionella risks must be considered, and a documented assessment made. [Health and Safety Commission's Approved Code of Practice 'Legionnaires disease: the control of legionella bacteria in water systems' ISBN 978 0717 617722](#).

All appliances conveying water for domestic uses should be of an appropriate standard (British Standards) and comply with the [Water Quality \(Water Fittings\) Regulations 1999](#) (England and Wales); [The Water Supply \(Water Fittings\) \(Scotland\) Byelaws 2014](#); [The Water Supply \(Water Fittings\) Regulations \(Northern Ireland\) 2009](#). Where such systems are connected to private water supplies the Water Quality (Water Fittings) Regulations should be used as a source of good practice.

A water safety plan with a distribution diagram is recommended to identify any risks to the supply and contingency measures to maintain a supply to workers.

2.4.2 Wastewater, Drainage and Solid Waste

Wastewater treatment and effluent discharge as well as solid waste treatment and disposal must comply with local effluent discharge standards and be adequately designed to prevent contamination of any water body, and without causing any significant impacts on site workers, the environment, or local communities.

Treatment and disposal services can be either provided by dedicated or existing municipal facilities.

[The Association of Labour Providers](#) recommends that units with their own plumbing system should be connected to the foul drainage system. The connection should be sealable when not in use.

There must be satisfactory provision for foul and wastewater drainage from each caravan, either by connection to a public foul water sewer, where available, or sewage treatment works or by discharge to a properly constructed and installed septic tank or cesspool, approved by the local authority. Systems must comply with the [Small sewage discharges in England: the general binding rules - GOV.UK \(www.gov.uk\)](#) and [Septic tanks and sewage treatment plants: what you need to do: Overview - GOV.UK \(www.gov.uk\)](#) must be obtained where appropriate.

Sewage systems including associated pipework and other appliances should be installed by a competent installer. All sewage treatment and containment units must meet approved standards of construction.

The foul water treatment or containment facility must be of sufficient capacity for the number of persons living in the units and for the type of effluent that it is intended to receive.

Septic tanks and cesspools must be emptied/de-sludged and maintained as often as necessary to prevent the blockage of below ground drainage fields or the uncontrolled release of sewage. [EA Guidance on Septic Tanks](#)

At no time must the foul and wastewater systems pollute any land or watercourse or pose a risk to public health or cause a nuisance.

Where units are occupied temporarily the sewage system must be sufficient to cope with the periodic loading of wastewater/material.

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An adequate number of specific containers for solid waste / rubbish collection should be provided and emptied regularly. Where possible, containers should be fire resistant and lidded to prevent pest ingress.

Rubbish containers should be located at a distance away from each accommodation unit in accordance with Building Regulations or advice from your Environmental Health Officer on a wooden, metal, or concrete stand.

Recycling of waste should be encouraged and provision for this available.

2.4.3 Pest Management

The site should be managed in such a way that pest ingress is prevented. This should be through management of waste (lidded or covered bins), management of water sources, harbourage sites and proofing.

A qualified contractor may be used or trained members of staff.

Pest extermination, pest control and disinfection should be carried out throughout the accommodation and site in compliance with any relevant risk assessment. Rodenticides may only be used by trained members of staff and located in such a way that they do not pose a hazard to occupants.

Pest monitoring should be performed on a regular basis to prevent any infestation.

Workers should be asked to notify any pest sightings to a member of management or site supervisors to allow the issue to be addressed in a timely and appropriate manner.

2.4.4 Security of Accommodation

Adequate security should be in place on site to protect workers' property against theft and any procedures for lost property or suspected theft should be communicated to occupants.

Provision of security for valuable personal items such as passports should be considered but care must be taken to ensure that staff have access to their own belongings at all times.

Locks on any doors and areas should be quick release and not pose any risk to means of escape in the event of an emergency. Personal safety concerns should be considered and acknowledged during worker representation meetings.

Security cameras may be considered if there is a particular risk of theft or personal safety, but privacy should be respected and location of cameras carefully considered, e.g., not in private accommodation, or communal toilet or shower areas.

2.5 Fire Safety

Fire is a considerable and significant risk in all areas and is covered by a number of pieces of legislation which can be found in Appendix 1.

There should be a member of staff (and deputy) designated as responsible for fire prevention and management.

Advice should be sought from a suitably qualified and experienced fire consultant/practitioner regarding a specific site assessment. A number of bodies including the Institution of Fire Engineers and Fire Industry Association maintain a [register of persons and companies who are competent to carry out fire risk assessments](#).

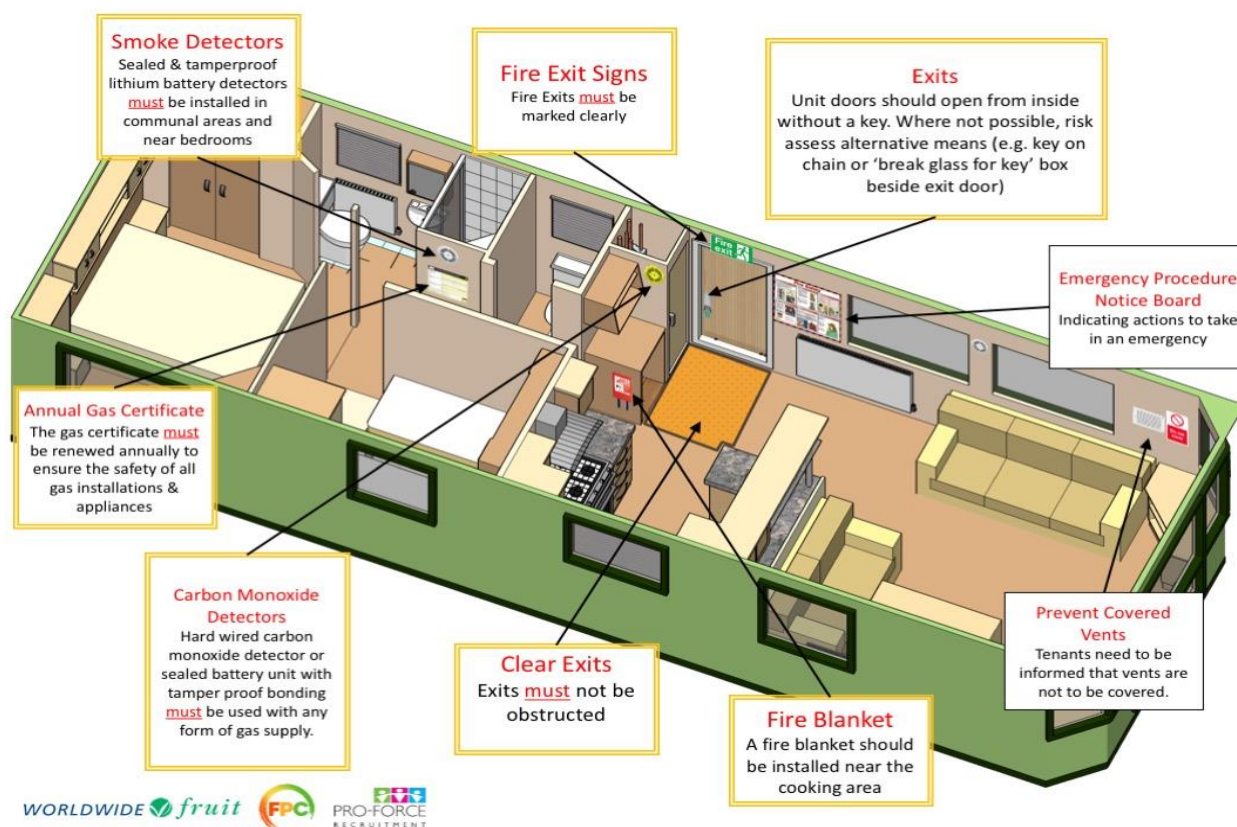


Figure: 6 Schematic plan of fire risk considerations in a caravan unit

2.5.1 Fire Risk Assessment

It is a legal requirement that employers must conduct a fire risk assessment of the accommodation, facilities, and surrounding sites they provide to identify potential fire hazards and assess the risk to the safety of occupants. Guidance can be found here:

[Fire safety in the workplace: Fire risk assessments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/fire-safety-in-the-workplace-fire-risk-assessments)

The assessment should consider fire prevention measures, means of escape, fire detection and warning systems, firefighting equipment, and emergency procedures. This should be reviewed yearly or in the event of any changes to occupancy numbers, facilities and / or accommodation layout for example.

2.5.2 Fire Safety Measures

Based on the fire risk assessment, employers must implement appropriate fire safety measures to reduce or eliminate the identified risks. This may include installing and maintaining fire alarms, fire extinguishers, emergency lighting, and fire doors.

There is valuable advice provided by the [Fire Safety Advice \(fia.uk.com\)](http://fia.uk.com) which outlines the specific requirements for caravans in relation to fire safety.

2.5.3 Fire Detection

In each unit either hard wired or, as a minimum, tamper proof lithium battery smoke detectors should be fixed securely in position to prevent unauthorised removal.

Smoke detectors should be fitted near sleeping areas (and away from cooking areas where heat alarms should be fitted to avoid false alarms leading to complacency). According to risk assessment, it may be necessary to put in more than one detector in larger units.

Fire alarms on site should be heard within accommodation units and any fire drills practiced should include workers in accommodation as well as in production areas.

2.5.4 Fire Extinguishers

Advice should be sought from fire safety professionals on the appropriate number, siting, and type of fire tackling equipment available in and around site accommodation facilities. This may be provided in the form of fire blankets or extinguishers but must be based on risk assessment and / or professional advice.

It should be established for all occupants what they should do if a fire is detected. This may be to immediately evacuate or to attempt to tackle a small blaze.

The Caravan Safety and Security Group recommends: “all caravans and motor homes carry an easily accessible multi-purpose fire extinguisher and a fire blanket.”

The Caravan Club’s advice states: “Although dry powder fire extinguishers are very effective in extinguishing all fires, they are not recommended for use in confined spaces, e.g., buildings, especially caravans. The Club has decided that AFFF [Aqueous Film Forming Foam] is the most effective for use on a caravan site and would recommend its use.”



There should be designated trained personnel able to use a fire extinguisher should the need arise.

2.5.5 Means of Escape

Employers must ensure that there are adequate and unobstructed means of escape from the accommodation in the event of a fire. Escape routes should be clearly marked, and occupants should be familiar with them. They should be lit and clearly identified.

In communal areas fire exits and routes should be clearly defined and free of obstacles and be able to be opened without the use of a key. Quick release locks and exits should be considered.

In units, any secondary exit via a window should be risk assessed to include the drop from the window and exterior surface.

Fire assembly points should be positioned safely away from carriageways and clearly marked.

Weather-proof, easily accessible Fire Points should be provided such that no caravan or site building is more than 30 metres away from it. They should be conspicuously marked 'FIRE POINT' with translations as appropriate.

All windows which can be opened should not fitted with bars or grills so that they can be used in the event of an emergency.

It is good practice that unit locks should be opened from the inside without a key. Many units still have key locks and therefore a fire safety risk assessment will determine suitable alternative measures, for example, having a key on a chain, or a break glass for key box located by the exit door.

Notices should be displayed in each unit and any communal areas, ideally in the workers' first language or using pictograms indicating: action to take in the event of an emergency; emergency numbers; site manager contact details; full address of the premises and OS map reference. The TUC provides advice on the [use of pictograms for health and safety information](#).

2.5.6 Fire Safety Training

Employers should provide fire safety training to occupants of the accommodation. This training should cover how to raise the alarm, how to use firefighting equipment, and the evacuation procedures.

A safety assessment and emergency action plan must be prepared, be communicated to, and made available to workers. The plan should include training of fire wardens, periodic testing and monitoring of fire safety equipment and periodic drills. The action plan must be communicated as part of a worker's induction.

2.5.7 Fire Evacuation Drills

Regular fire evacuation drills should be conducted to ensure that occupants know what to do in case of a fire emergency. The frequency should be determined by risk but as a minimum, performed annually.

2.5.8 Maintenance and Testing

All fire safety equipment and systems in the accommodation must be maintained in good working order. Regular testing and servicing of fire alarms, extinguishers, and emergency lighting are essential.

Alarms and detectors should be tested weekly. Battery operated alarms should be in place but tested to ensure battery life is sufficient.

2.5.9 Fire Safety Information:

Employers should provide occupants with information about the fire safety measures in place, the fire evacuation procedures, and any other relevant fire safety information.

2.5.10 Special Arrangements for Vulnerable Occupants:

If the accommodation houses vulnerable occupants (e.g., elderly, or disabled individuals), special arrangements should be made to ensure their safety in case of a fire.

2.5.11 Record Keeping:

Employers should keep records of the fire risk assessment, fire safety measures implemented, maintenance and testing records, and fire safety training provided.

2.6 Furnishings and Fire Safety

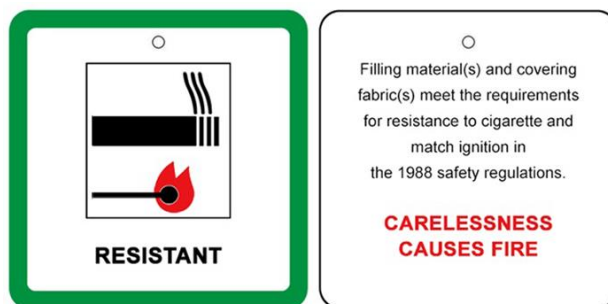
[Furniture and Furnishing \(Fire\) \(Safety\) Regulations 1988 \(as amended\)](#) sets levels of fire resistance for domestic upholstered furniture, furnishings and other products containing upholstery and responsibilities which apply to the supplier of the furniture, including an accommodation provider letting property as a source of income.

Under the Furniture and Furnishing (Fire) (Safety) Regulations 1988 (as amended), employers who provide accommodation to their workers have specific obligations to ensure that the furniture and furnishings in the accommodation meet fire safety standards. These regulations are designed to reduce the risk of fire spread and enhance the safety of occupants. The key obligations of employers under the Furniture and Furnishing (Fire) (Safety) Regulations 1988 (as amended) include:

Fire Resistance Standards: The regulations require that certain types of furniture and furnishings provided in the accommodation meet specific fire resistance standards. These standards aim to ensure that the furniture and furnishings will not ignite easily and will not contribute to the rapid spread of fire.

The use of flame-retardant chemical treatments on fabrics may be considered if in accordance with professional advice and usage instructions.

Furniture Labelling: Furniture and furnishings that are covered by the regulations must bear a permanent label indicating that they comply with the relevant fire safety standards. The label helps occupants and users identify furniture that meets the required fire resistance standards.



Compliance with Safety Standards: Employers are responsible for ensuring that the furniture and furnishings they provide in the accommodation meet the required fire safety standards. This includes complying with the specific fire resistance tests applicable to different types of furniture.

Maintenance and Replacement: Employers should ensure that the furniture and furnishings remain in a safe condition throughout their use in the accommodation. If any furniture becomes damaged or non-compliant with fire safety standards, it should be repaired or replaced promptly.

Fire Safety Information: Employers should inform occupants of the accommodation about the fire safety features of the furniture and furnishings provided. This can include providing information on the fire resistance standards and the significance of the labelling on the furniture.

Records and Traceability: Employers should keep records of the furniture and furnishings provided in the accommodation, including information on their compliance with fire safety standards. Having such records ensures traceability and accountability for fire safety measures.

Failure to comply with the fire safety regulations can result in deaths, injury, or legal consequences, including fines or imprisonment. Employers must take their fire safety obligations seriously and ensure that the accommodation is adequately protected from fire risks, and occupants are well-informed about fire safety measures and evacuation procedures. Additionally, employers should consult relevant government guidance and seek professional advice to ensure full compliance with the specific fire safety regulations in their respective jurisdictions (England and Wales, Northern Ireland, or Scotland)

2.7 Gas Safety

Where gas is supplied, a carbon monoxide detector must be fixed securely to prevent unauthorised removal.

Landlords and accommodation providers must comply with the Gas Safety (Installation and Use) Regulations 1998. Gas installations must be maintained at least annually by a suitably qualified person registered with the [Gas Safe Register](#) and records kept for at least two years.

Occupiers should be provided with a copy of the gas safety certificate within 28 days of the check being completed or displayed on the wall in the unit. It is recommended that originals be kept in the office.

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- Always store and use gas bottles in an upright position, on a hard standing and secured to prevent theft and tampering.
- Store gas bottles in a well-ventilated place
- Ensure gas bottles are stored away from sources of heat and ignition.
- Make sure gas bottles are stored outside, away from building entry/exit points and drains.
- Replacement must be carried out by a site manager or designated person only.

- Do not store or use gas bottles below ground level.
- Do not store or use gas bottles lying down.
- Do not keep gas bottles near corrosive, toxic, or oxidant material.

LPG cylinders should be stored in accordance with [UKLPG Code of Practice No. 7 'Storage of Full and Empty LPG Cylinders and Cartridges'](#). Separation distances vary depending on the quantities of LPG being stored.

2.8 Electrical Safety

Poorly maintained electrical systems and appliances may cause a risk of fire or electrocution for occupants. The HSE has published guidance - [Electricity and the law - Electrical safety \(hse.gov.uk\)](#) – which outlines useful information.

Within domestic (household) premises, consumer units / fuse boxes and similar switchgear assemblies shall comply with BS EN 61439-3 and shall:

- (i) have their enclosure manufactured from non-combustible material, or
- (ii) be enclosed in a cabinet or enclosure constructed of non-combustible material and complying with Regulation 132.12.

Ferrous metal, e.g., steel, is deemed to be an example of a non-combustible material. The implementation date for this regulation was 1st January 2016.

Approved electrical outlets should be installed in accordance with [Requirements for Electrical Installations. IET Wiring Regulations](#).

Electrical installations should have a routine annual visual check every 12 months, and this should be documented. This should be completed by a qualified electrician.

Electrical Installation Condition Reports (EICR) are required by law on all domestic rental properties as of 1st April 2021. This is an in-depth check of all the electrical circuits in a property and highlights any potential dangers such as deterioration, defects, damage, or non-compliances with present day safety standards.

[Guide for landlords: electrical safety standards in the private rented sector - GOV.UK \(www.gov.uk\)](#)

Generally, for domestic installations in good condition, an EICR is recommended at least **once every ten years for homeowners and is mandatory at least once every 5 years for private rentals**. Electrical appliances supplied should have a CE or UKCA manufacturers' (European law compliance) marking.

PAT Requirements

The Electricity at Work Regulations 1989 require that any electrical equipment that has the potential to cause injury is maintained in a safe condition. Although the Regulations do not specify what needs to be done, by whom or how frequently, the recommended way to achieve and demonstrate this is to undertake Portable Appliance Testing (PAT) on items on an annual basis.

Accommodation providers should take a risk-based approach to PAT testing based on the type of appliance, the location, use and age. It is recommended that appliances that are tested are stickered with a date of testing and a record is kept of the test. This may be done by an independent electrician or a trained member of staff with a certificate of competence.

Personal electrical items that are brought into accommodation (such as hairdryers, chargers etc) should be known and considered as part of any fire or electrical risk assessment, inspection and / or testing requirements.

An adequate number of electrical sockets should be provided in each unit to discourage the inappropriate use of multi-adaptors which can pose a fire risk.

Extension leads may be provided but not where a risk to electrical or personal safety may be an issue.

Workers should be advised whether they need to bring adapters with them and of the appropriate UK plug type.

2.9 Provision of First Aid and Medical Facilities

The Health and Safety (First-Aid) Regulations 1981 [The Health and Safety \(First-Aid\) Regulations 1981 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukreg/1981/1111/1) require employers to provide adequate and appropriate first-aid equipment, facilities and people so your workers can be given immediate help if they are injured or taken ill at work. (*HSE First Aid at Work*)

What is 'adequate and appropriate' will depend on the circumstances in your workplace and you should assess what your first-aid needs are. As a guidance, you should provide the following:

- First aid kits sufficient for the number of workers should be available in a communal area.
- First aid kits must be adequately stocked.
- There should be a defibrillator located in central communal area with staff training provided as appropriate. If there is a defibrillator located in the local community, the location should be made known to workers.
- A 24/7 first aid service/facility should be available, including local NHS provision. There should be a means for staff to access emergency medical care.

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- Staff who are unwell and unable to work should be known and care provided. There should be procedures in place to ensure that staff are checked upon whilst unwell to ensure they receive the care they need, and any worsening health is identified.
- Inform all workers what the first aid arrangements are, this can include posters, signs and during induction training.

Accident record book

An accident record book is a legal requirement on a site to record and report details of specified work-related injuries and incidents. This applies throughout the site and covers accidents, incidents and near misses that take place in accommodation as well as in the workplace.

Signposting workers to support services in discreet areas without fear of reprisal is recommended. A list of National Support Networks is provided in Appendix 2.

2.10 Worker Leisure Facilities

It is recommended that adequate leisure facilities are provided for workers to rest and socialise in their free time, particularly where workers accommodation is in a remote area away from communities.

There should be a member of staff designated as responsible for any social areas. These areas should be included in risk assessments and facility checks.

There should be a provision of both indoor and outdoor facilities.

These facilities may include:-

Wi-Fi

- This should be free and accessible to all workers as best practice.
- If there are limits on use, then these need to be made clear to the worker on induction as to terms of use.

BBQ

- Provide a suitable platform to place any BBQ facilities and prevent fire.
- Brick built units should be checked regularly for cracks or damage that may cause it to collapse, cans or metal units should be checked regularly for corrosion.
- Consider placing appropriate fire extinguishers next to BBQ area in the event of a fire.
- Consider if specific BBQ areas are required to observe cultural or religious differences.
- Fire risks from BBQ's must be considered within any risk assessment.

Social Club / Community Lounge

- Seating provided should be of sufficient number for the number of workers who may use the facility and maintained to an acceptable standard.
- Room/s should be included on a cleaning schedule to ensure that good housekeeping is maintained.

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- Waste bins should be appropriate for the types of waste and consider recycling of metal / glass / paper where possible.
- Where communal toilets are provided these should also be included on the cleaning schedule but may be subject to more frequent checks to ensure cleanliness

Gym Facilities

- Where appropriate provide training and / or pictorial instructions for use of equipment where possible and there should be clear guidance that equipment is used at the person's own risk.
- Ensure equipment is checked on a scheduled basis for damage or wear & tear.
- Ensure carpets and mats are checked and maintained to prevent any trip hazards.

Access to shops and local services

- Where workers cannot walk within a reasonable distance (30 minutes) then transport should be provided on a scheduled basis.

On Site Shop

- If you are providing a staff shop, whether that be operated by yourself or a 3rd party there should be the relevant Food Hygiene approvals in place as determined by the local County Council.
- It should be considered whether segregation of products is required to observe cultural or religious differences.
- Prices of goods must be comparable and consistent with pricing in other local shops.

Culture & Religion

- Where possible and appropriate you may wish to consider providing facilities for prayer or observe religious celebrations

There may be other facilities provided such as dart boards, pool / snooker tables or volleyball courts etc. in all instances any facilities provided should be in good repair and well maintained.

Appendix 1 Useful Legislation and References

Planning and Caravan Specific Legislation

England

[The Town and Country Planning \(General Permitted Development etc.\) \(England\) \(Amendment\) Order 2023 \(legislation.gov.uk\)](#)

[Caravan Sites Act 1968 \(legislation.gov.uk\)](#)

[Caravan Sites and Control of Development Act 1960 \(legislation.gov.uk\)](#)

Scotland

[The Town and Country Planning \(Development Planning\) \(Scotland\) Regulations 2023 \(legislation.gov.uk\)](#)

[The Caravan Sites Act 1968 \(Amendment of Definition of Caravan\) \(Scotland\) Order 2019 \(legislation.gov.uk\)](#)

Northern Ireland

[The Planning \(General Permitted Development\) \(Amendment\) Order \(Northern Ireland\) 2023 \(legislation.gov.uk\)](#)

[Caravans Act \(Northern Ireland\) 2011 \(legislation.gov.uk\)](#)

Wales

[The Town and Country Planning \(General Permitted Development\) \(Amendment\) \(Wales\) Order 2021 \(legislation.gov.uk\)](#)

[The Caravan Sites Act 1968 \(Amendment\) \(Wales\) Order 2007 \(legislation.gov.uk\)](#)

Find your local authority: <http://local.direct.gov.uk/LDGRedirect/Start.do?mode=1>

Accommodation provider and Rental Legislation and Guidance

[How to let - GOV.UK \(www.gov.uk\)](#)

[Tenant Fees Act 2019: guidance - GOV.UK \(www.gov.uk\)](#)

[Accommodation provider and tenant rights and responsibilities in the private rented sector - GOV.UK \(www.gov.uk\)](#)

[Homes \(Fitness for Human Habitation\) Act 2018 - GOV.UK \(www.gov.uk\)](#)

[The Housing Act 2004](#)

[The Licensing and Management of Houses in Multiple Occupation and Other Houses \(Miscellaneous Provisions\) \(England\) Regulations 2006 \(legislation.gov.uk\)](#)

Employment and Accommodation

TUC pictogram information: Working in the UK: A guide to your rights:

<https://www.tuc.org.uk/workingintheuk>

National Minimum Wage Offset Guidance: <https://www.gov.uk/national-minimum-wage-accommodation>

[Just Good Work](#)

Health & Safety and First Aid

[The Health and Safety \(First-Aid\) Regulations 1981 \(legislation.gov.uk\)](#)

[The Health and Safety \(First-Aid\) \(Amendment\) Regulations \(Northern Ireland\) 2017 \(legislation.gov.uk\)](#)

HSE first aid needs assessment: <http://www.hse.gov.uk/firstaid/needs-assessment.htm>

St John Ambulance - First Aid Calculator: <https://www.sja.org.uk/course-information/guidance-and-help/working-out-what-you-need> and courses: <https://www.sja.org.uk/courses/>

HSE First Aid Guidance: <https://www.hse.gov.uk/simple-health-safety/firstaid/index.htm>

HSE leaflets: <https://www.hse.gov.uk/pubns/firindex.htm>

Health and Safety at Work: RIDDOR reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013: <http://www.hse.gov.uk/riddor/index.htm>

Health and Safety Executive – risk assessments: <http://www.hse.gov.uk/risk/controlling-risks.htm>

Specific Living Condition Considerations

[Public Health England 'The Cold Weather Plan for England: Protecting health and reducing harm from cold weather' October 2018](#)

[HSE advice on working in cold and signs of cold stress](#)

[HSE advice on working in heat and signs of heat stress](#)

[Heat Stress Check List \(hse.gov.uk\)](#)

[Can damp and mould affect my health? - NHS \(www.nhs.uk\)](#)

[Repairs - damp - Citizens Advice](#)

[Equality Act guidance | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

[Separate and single-sex service providers: a guide on the Equality Act sex and gender reassignment provisions | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

[Domestic Abuse Bill 2020: factsheets - GOV.UK \(www.gov.uk\)](#)

FPC Guidance on provision of temporary accommodation units for workers in the UK

[The five steps | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

[How prayer rooms improve wellbeing and how best to design them \(interaction.uk.com\)](#)

Public and Private Water Supplies

[HSE advice on legionella disease and link to Health and Safety Commission Approved Code of Practice 'Legionnaires disease: the control of legionella bacteria in water systems ISBN 978 0717 617722](#)

[The Water Supply \(Water Quality\) Regulations 2018 \(legislation.gov.uk\)](#)

[The Public Water Supplies \(Scotland\) Amendment Regulations 2022 \(legislation.gov.uk\)](#)

[The Water Supply \(Water Quality\) Regulations \(Northern Ireland\) 2017 \(legislation.gov.uk\)](#)

[EU Drinking Water Directive 2020](#)

[The Private Water Supplies \(England\) Regulations 2016 \(legislation.gov.uk\)](#)

[The Private Water Supplies \(England\) \(Amendment\) Regulations 2018 \(legislation.gov.uk\)](#)

[The Private Water Supplies \(Wales\) Regulations 2017 \(legislation.gov.uk\)](#)

[The Private Water Supplies Regulations \(Northern Ireland\) 2017 \(legislation.gov.uk\)](#)

Gas And Electrical Safety

[BSI Standard for Gas Safety in Domestic Installations](#)

Gas Safe Register: www.gassaferegister.co.uk and
<https://www.gassaferegister.co.uk/media/1443/short-term-lets.pdf>

Storing gas bottles: <https://www.calor.co.uk/gas-bottles/gas-cylinder-safety/storing-gas-bottles>

UKLPG Code of Practice No. 7 'Storage of Full and Empty LPG Cylinders and Cartridges':
<https://www.calor.co.uk/gas-bottles/gas-cylinder-safety/storing-gas-bottles>

[Electrical safety standards in the private rented sector: guidance for landlords, tenants and local authorities - GOV.UK \(www.gov.uk\)](#)

[Electrical standards and approved codes of practice - Electrical safety \(hse.gov.uk\)](#)

[Maintaining portable electrical equipment in low-risk environments \(INDG236\(rev2\)\) \(hse.gov.uk\)](#)

[Guide for landlords: electrical safety standards in the private rented sector - GOV.UK \(www.gov.uk\)](#)

Fire Regulations and Fire Safety Advice

[The Fire Safety \(England\) Regulations 2022 \(legislation.gov.uk\)](#)

FPC Guidance on provision of temporary accommodation units for workers in the UK

[Fire Safety Act 2021 \(legislation.gov.uk\)](#)

[Domestic Fire Safety \(Wales\) Measure 2011 \(legislation.gov.uk\)](#)

[The Fire \(Scotland\) Act 2005 \(Relevant Premises\) Regulations 2012 \(legislation.gov.uk\)](#)

[The Fire Safety \(Scotland\) Amendment Regulations 2010 \(legislation.gov.uk\)](#)

[The Fire Safety Regulations \(Northern Ireland\) 2010 \(legislation.gov.uk\)](#)

[The Furniture and Furnishings \(Fire\) \(Safety\) \(Amendment\) Regulations 2010 \(legislation.gov.uk\)](#)

Institution of Fire Engineers and Fire Industry Association register of persons and companies who are competent to carry out fire risk assessments: <https://www.ife.org.uk/Fire-Risk-Assessors-Register>

and: <https://www.fia.uk.com/membership/member-directory.html>

Guidance Document on Caravan and Camping Sites Fire Safety Equipment Requirements – Fire Industry Association: <https://www.fia.uk.com/resources/fire-safety-advice.html>

[Fire Kills Lets Prevent It: Fire Safety in Shared or Rented Accommodation \(publishing.service.gov.uk\)](#)

[The British Holiday & Home Parks Association: http://www.bhhpa.org.uk/](#)

Caravan and Motorhome Club: <https://www.caravanclub.co.uk/>

Environmental Protections

[Environmental Protection Act 1990](#)

[Environment \(Wales\) Act 2016](#)

[Waste Management \(Scotland\) Regulations 2011](#)

[Northern Ireland Waste and Contaminated Land Order 1997](#)

[Environment Agency Flood Risk Map](#)

[EA Guidance on Septic Tanks](#)

[Noise management - GOV.UK \(www.gov.uk\)](#)

[Light pollution - GOV.UK \(www.gov.uk\)](#)

Appendix 2: Information on National Support Networks and Ethical Organisations

Helplines and Support for Modern slavery and Exploitation

Modern Slavery Network - [Labour exploitation | Modern Slavery Intelligence Network \(msin.org.uk\)](#) If you suspect modern slavery, report it to the [Modern Slavery Helpline](#) on 08000 121 700 or the police on 101. In an emergency always call 999.

Gangmasters and Labour Abuse Authority: www.gla.gov.uk tel: **0800 432 0804**. You can report exploitation concerns here: [Labour abuse - Report form - Exploitation - GLAA](#)

RSABI – Supporting People in Scottish Agriculture: <https://rsabi.org.uk/Home-Page>. The Seasonal Workers helpline is open weekdays from 5 to 8pm, weekends 10:30am to 2pm on 0300 111 4160 with translation services available. [Scotland Seasonal Workers Guidance](#)

The Worker Support Centre Scotland - [Worker Support Centre Scotland |](#) - supports migrants in Scotland who are on the Seasonal Worker visa (Temporary work) to access free, impartial & confidential information about their workplace rights, support and advice.

Unseen – [About Us - Unseen \(unseenuk.org\)](#) Unseen is a UK charity who provide safehouses and support in the community for survivors of trafficking and modern slavery. Unseen run the UK **Modern Slavery & Exploitation Helpline** - 08000 121 700 and have a reporting function [File a report \(modernslaveryhelpline.org\)](#)

Trade Associations and Non-Governmental Organisations

Fresh Produce Consortium: www.freshproduce.org.uk tel: 01733 237117

National Farmers Union CallFirst: <https://www.nfuonline.com/membership/your-nfu-services/nfu-callfirst/>

Ethical Trading Initiative: <http://www.ethicaltrade.org/>

International Labour Organisation : <http://www.ilo.org/global/lang--en/index.htm>

Food Network for Ethical Trade - [About FNET - FNET \(foodnetworkforethicaltrade.com\)](#)

Sedex - [Sustainable Supply Chain Solutions - Sedex](#)

Stronger Together - [Stronger Together, tackling modern slavery in supply chains \(stronger2gether.org\)](#)

The Association of Labour Providers: <http://labourproviders.org.uk/>

SMETA (Sedex) Audit - [SMETA Audit, the world's leading audit - Sedex](#)

FLEX: [FLEX – Focus on Labour Exploitation](#)

Just Good Worker - [Just Good Work](#) - Just Good Work is a free interactive mobile app, giving job-seekers and workers critical information and advice for everything needed on the journey to work, from recruitment, to employment and life in a new destination, to moving on or returning home.

General Helplines

National Health Service

NHS (with translation services) Scotland - [Contact us | NHS inform](#)

[NHS England » Contact NHS England](#)

Alcoholics Anonymous: www.alcoholics-anonymous.org.uk tel: 0800 9177 650

Citizen's Advice Bureau: To find your local office visit: <https://www.citizensadvice.org.uk/>

Equality Advisory and Support Service: <https://www.gov.uk/equality-advisory-support-service> tel: 0808 800 0082

Mind – Mental Health charity: <http://www.mind.org.uk/> ; tel: 0300 123 3393

Samaritans : <https://www.samaritans.org/> tel: 116 123

GamCare – national gambling helpline: www.gamcare.org.uk tel: 0808 8020 133

Appendix 3: Housing Act 2004 and Housing Health & Safety Tool

Some growers are using The Housing Act as a reference to develop their own risk assessment.

The [Housing Act 2004](#) and associated statutory instruments apply to permanent dwellings and not to moveable dwellings used as temporary accommodation. However, the Act provides guidance on identifying common health and safety hazards in the home.

[Housing Health and Safety Rating System](#)

This is a risk-based evaluation tool - [Housing Health & Safety Tool](#) - to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It was introduced under the Housing Act 2004 and applies to properties in England and Wales.

There are 29 hazards under the Housing Health and Safety Rating System which are:

- | | |
|--------------------------------------------|----------------------------------------------|
| Damp and mould growth | Excess cold |
| Excess heat | Asbestos and manufactured mineral fibres. |
| Biocides | Carbon monoxide and fuel combustion products |
| Lead | Radiation |
| Uncombusted fuel gas | Volatile Organic Compounds |
| Crowding and space | Entry by intruders |
| Lighting | Noise |
| Domestic hygiene, pests and refuse | Food safety. |
| Personal hygiene, sanitation, and drainage | Water supply for domestic purposes |
| Falls associated with baths etc. | Falls on level surfaces. |
| Falls associated with stairs and steps | Falling between levels. |
| Electrical hazards | Fire |
| Flames, hot surfaces etc. | Collisions and entrapment |
| Explosions | Position and operability of amenities |
| Structural collapse and falling elements. | |

For more advice see the [Department for Communities and Local Government's 'Housing Health and Safety Rating System: Guidance for Landlords and Property Related Professionals'](#).

Appendix 4 – Example Site Facility Check

WEEKLY ACCOMMODATION CHECK		Present & Working Correctly? Y / N	Is there a H&S risk? Y/N	Is an improvement required? Y/N	What action is required?			Is the Action Complete?
					What action is required?	By Whom?	By When?	
DATE:	CARAVAN NO:							
Kitchen & Hall								
Are there any dripping taps in the kitchen?								
Is there any damp, mould, holes in the floor or concerns about the floor structure?								
Can you feel any give or holes in the floor structure?								
Safety Notices & Equipment - are the following present, clean, readable and damage free?								
Fire Blanket								
CO Detector								
Smoke Alarm								
Fire Exit clear and signed								
Fire Action Notice								
No Smoking Sign								
Equipment List								
Is the Kitchen area clean, tidy and free from damage, damp and mould?								
Is the fridge clean, unfrosted and free from damage?								
Is the cooker clean and free from damage?								
Are there any dripping taps in the kitchen?								
Are all the lights working and free from damage?								
Lounge/Living Room								
Is the living room clean, tidy and free from damage, damp and mould?								
Is the furniture clean and free from damage?								
Is the second door, clear of obstruction and does it open and close correctly?								
Are all the lights working and free from damage?								
Bedrooms								
Are the bedrooms clean, tidy and free from damage, damp and mould?								
Are the beds in good condition?								
Are the employees using bedlinen?								
Are all the lights working and free from damage?								
Bathroom								
Is the bathroom / toilet clean and tidy?								
Is there mould on the walls, ceiling, curtains, windows, fittings?								
Is the shower curtain / door clean and functioning?								
Are there any dripping taps in the bathroom?								
Are all the lights working and free from damage?								
Is the ventilation working correctly?								
Floors								
Is there any damp, mould, holes in the floor or concerns about the floor structure?								
Are the floors free from hazards which could cause a trip or fall?								
Is the carpet throughout the caravan, clean, flat and free from damage?								
Is the Lino throughout the the caravan clean, flat and free from damage?								
Can you feel any give or holes in the floor structure?								
Caravan Equipment & General Checks								
Does the caravan have 1 medium and 1 large heater?								
Is there any unauthorised electrical equipment in the caravan? remove								
Are the curtains and net curtains hung, working and clean?								
Are all the vents open and uncovered?								
Are all the sky lights, working and free from damage?								
Are all the electrical sockets secure, safe and free from damage?								
Are all ceilings in good condition and not misshaped?								
What is the general condition of the caravan?								
External Checks								
Is the outside area clean, tidy and no items stored under the caravan?								
Are the ramp and handrail, free from trip hazards, safe and secure?								
Is the picnic bench away from the second door?								
Is the gas bottle secured to the caravan and on a concrete pad?								
Any other comments or pictures								

Appendix 5: Existing Accommodation Standards and Assurance Schemes

There are a number of different assurance schemes and standards which are used in the UK fresh produce industry. These standards will usually require legislative standards to be met but may also go beyond these requirements and include 'best practice' guidance. These standards include:

[Dept for Communities and Local Govt: Decent Home Definitions and Guidance 2006](#) – applicable to the social sector but currently under consultation for the private sector.

DEFRA Guidance for Seasonal Workers

[Seasonal work on farms: guidance for workers - GOV.UK \(www.gov.uk\)](#)

“Farming and growing businesses are required to keep you safe by: ensuring premises are clean, providing safe and clean accommodation if required (usually at a small cost) and ensuring any transport they provide meets safety guidelines”.

Gangmasters and Labour Abuse Authority Standards

[The Gangmasters and Labour Abuse Authority Regulations 2005, Regulations 12 \(1\) and 12 \(2\)](#)

Accommodation may be provided by a licensed GLAA labour provider. Certain Standards of [The Gangmasters and Labour Abuse Authority](#) apply to accommodation and the GLAA provides guidance on when a licence holder is considered as providing accommodation – [Licensing Standards October 2018 \(gla.gov.uk\)](#). pg 17 outlines the requirements for a GLAA licence holder if they provide accommodation to labour. The headline requirements are:

“The accommodation must be maintained in a good state of repair, must contain adequate kitchen, bathroom, and toilet facilities for the number of occupants and must not be overcrowded.

Any category 1 hazards as assessed under the Housing Health and Safety Rating System must be properly resolved.

Furniture and furnishings supplied in the accommodation must comply with all relevant legislation.

Gas installations must be maintained at least annually by a suitably qualified person registered with the Gas Safe Register: www.gassaferegister.co.uk Copies of the annual gas safety check must be given to all occupants or prominently displayed in the property. If such a person has said that remedial actions are needed to make the installation safe, this remedial work must be undertaken as soon as possible by a suitably qualified person.

Electrical equipment, including the fixed wiring and any appliances, must be safe and properly maintained.

The GLAA will take a proportionate view in deciding on whether to fail this standard for minor infringements or easily fixable issues”.

FPC Guidance on provision of temporary accommodation units for workers in the UK

Whilst a company may not be directly providing temporary accommodation to workers, Labour Users also have a responsibility to ensure that temporary workers are housed in suitable accommodation which is safe and comfortable.

Ethical Trading Initiative

The [Ethical Trading Initiative \(ETI\) Base Code](#) is founded on the conventions of the [International Labour Organisation \(ILO\)](#) and is an internationally recognised code of labour practice. Assurance schemes and standards which use the ETI Base Code as a means of auditing or reviewing conditions in place can refer to ETI principle 3: Working conditions are safe and hygienic, which states

'Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers'.

Red Tractor Assurance Standards

The [Red Tractor Fresh Produce Standards](#) include the standard (PL.6 – revised November 2021) that *'Any temporary, on site accommodation provided must be habitable and have basic services'*. This is measured on the following basis:

*Accommodation, as provided, is sanitary and fit for purpose (e.g., sound roof, windows, and doors).
A clean and functioning refrigerator is available for food storage.
Potable water is available for drinking and hot water for washing.
Sanitary washing and toilet facilities are available.
Heating facilities are present if accommodation is used between 1 October and 31 March.
Fire safety precautions are in place (e.g., smoke alarm, fire extinguisher).
Electrical installations are inspected annually (for every 3 years if underground) by a qualified electrician.
Gas installations must be maintained at least annually by a qualified gas engineer.*

Stronger Together

This detailed resource provides guidance and a checklist:

[Accommodation Due Diligence Guide and Checklist - Stronger Together \(stronger2gether.org\)](https://stronger2gether.org)

UK Multiple Retailer Standards

UK retailers may have their own specific codes of practice and requirements that may be included in their conditions of supply. Accommodation providers are encouraged to understand the specific conditions which may be included in such codes of practice and ensure that these are understood and communicated throughout the business.

IFP and EBRD Accommodation Standards

This useful and comprehensive guidance addresses the processes and standards that should be applied to the provision of workers' accommodation in relation to projects funded by the International Finance Corporation and the European Bank for Reconstruction and Development (IFPC/EBRD): [Workers' accommodation: processes and standards \(ifc.org\)](https://ifc.org)

FNET / ALP / BRC / FPC / Stronger Together co-branded Guidance

[UK Grower Best Practice Toolkit - March 2023 - FNET \(foodnetworkforethicaltrade.com\)](#)

Accommodation meets worker's basic needs with safe, hygienic, and appropriate provisions of sanitary and toilet facilities, drinking and general usage water, electrics, power, thermal comfort, and waste disposal.

- 2. Accommodation is managed by a trained competent manager, is well maintained, and repairs are made in a timely manner.*
- 3. Suitable and sufficient risk assessments are carried out with safety measures adequately controlling risks.*
- 4. Adequate accommodation security on site protects workers and there is space for secure storage of workers' belongings.*
- 5. Workers are given clear, complete, accurate and fair information during the recruitment process at pre-acceptance stage. Induction training informs workers of accommodation arrangements & health and safety risks and control measures.*
- 6. Workers are issued with a copy of a fair legal letting agreement. Accommodation rules and any disciplinary action are fair.*
- 7. Each bedroom is a reasonable size, occupancy avoids overcrowding, privacy and personal space is preserved.*
- 8. Workers can raise issues and grievances and access remedy. Accommodation committee of management and worker workers works together to improve accommodation standards.*
- 9. Adequate and safe provisions to buy, store and prepare food (or catering is provided) and eat socially.*
- 10. Workers can access adequate leisure and social facilities and cultural/religious observances are accommodated*

ALP – Association of Labour Providers

ALP is a not-for-profit trade association promoting responsible recruitment so that labour provision in our sectors is recognised as a model of sustainable good practice.

[Association of Labour Providers](#) - ALP Brief 138 – Accommodations Standards Audit Checklist

ESC International

ESC International is an ethical trade consultancy with a focus on modern slavery, labour exploitation, worker rights, and the environment.

[Worker Accommodation Guidance UK - ESC International](#)

International Labour Organisation

Guidance is set out in the following recommendation factsheet.

[International Labour Organisation \(ILO\) ILO Workers' Housing Recommendation 115:](#)

FPC Guidance on provision of temporary accommodation units for workers in the UK

Housing should ensure “structural safety and reasonable levels of decency, hygiene and comfort”.

The undertaking should ensure the following:

- a) a separate bed for each worker;*
- b) adequate headroom, providing full and free movement, of not less than 203 centimetres;*
- c) the minimum inside dimensions of a sleeping space should be at least 198 centimetres by 80 centimetres;*
- d) beds should not be arranged in tiers of more than two;*
- e) bedding materials should be reasonably comfortable;*
- f) bedding and bedframe materials should be designed to deter vermin;*
- g) separate accommodation of the sexes;*
- h) adequate natural light during the daytime and adequate artificial light;*
- i) a reading lamp for each bed;*
- j) adequate ventilation to ensure sufficient movement of air in all conditions of weather and climate;*
- k) heating where appropriate;*
- l) adequate supply of safe potable water;*
- m) adequate sanitary facilities (see below);*
- n) adequate drainage;*
- o) adequate furniture for each worker to secure his or her belongings, such as a ventilated clothes locker which can be locked by the occupant to ensure privacy;*
- p) common dining rooms, canteens, or mess rooms, located away from the sleeping areas;*
- q) appropriately situated and furnished laundry facilities;*
- r) reasonable access to telephone or other modes of communications, with any charges for the use of these services being reasonable in amount; an*
- s) rest and recreation rooms and health facilities, where not otherwise available in the community.*

In workers’ sleeping rooms the floor area should not be less than 7.5 square metres in rooms accommodating two persons; 11.5 square metres in rooms accommodating three persons; or 14.5 square metres in rooms accommodating four persons.

If a room accommodates more than four persons, the floor area should be at least 3.6 square metres per person.

Rooms should indicate the permitted number of occupants. As far as practicable, sleeping rooms should be arranged so that shifts are separated and that no workers working during the day share a room with workers on night shifts.

Adequate sanitary facilities should include a minimum of one toilet, one wash basin and one tub or shower for every six persons.

There should be separate sanitary facilities provided for men and for women.

There are standards and guidance such as the [‘International Labour Organisation \(ILO\)’s Workers’ Housing Recommendations \(1961\)](#) covering certain elements such as minimum space allocated per person; supply of safe water; adequate sewage and waste disposal; appropriate protection against heat, cold, damp, noise, fire etc.

FPC Guidance on provision of temporary accommodation units for workers in the UK

The Business in the Community '*Voluntary Code of Practice on Employing Migrant Workers/Overseas Staff in Great Britain*' advised that workers should not be required to stay in accommodation provided by the employer but should be free to choose their own if they wish to do so.

Withdrawn Standard previously available - BSI Standard: 'Leisure accommodation vehicles – caravan holiday homes – habitation requirements relating to health and safety':

<http://shop.bsigroup.com/ProductDetail/?pid=00000000030237573>

DRAFT

Appendix 6: Methodology for developing this guidance & acknowledgements

The Fresh Produce Consortium was approached in 2016 by a group of members and asked to develop industry guidance on the provision of caravan accommodation for temporary workers in the UK. FPC worked with this group of members and the Ethical Trading Initiative's Retailer Group to develop a draft which was issued for consultation with key stakeholder groups, growers and FPC members.

The consultation aimed to encourage participation and to help growers identify the current status of caravan accommodation and aspects requirement improvement.

Initial Consultation key stakeholder groups:

Association of Labour Providers
Association of Recruitment Consultancies
BEIS
British Growers Association
British Retail Consortium
Chartered Institute for Environmental Health
Chilled Food Association
Concordia
CORE Coalition
English Apples and Pears
Ethical Trading Initiative
Fire services
Food and Drink Federation
GLAA
GMB
Health and Safety Executive
HOPS Labour Solutions
Institute for Human Rights and Business
Institution of Occupational Safety and Health
Local planning authorities
National Farmers Union
Recruitment and Employment Federation
Response Recruitment Ltd
SEDEX
Staffing Group
Staffline Group
TUC
UK Accommodation Working Group
UK Race and Europe Network
Unison
UNITE
Unseen

FPC Guidance on provision of temporary accommodation units for workers in the UK

There have since been revisions every 1-2 years culminating in this 5th Edition. Two in-person workshops were held in 2023 with a Working Review Group and revisions of the draft issued to this Group and then wider stakeholders. The following were part of the initial Working Group:

Catherine Chinn	Cobrey Farms	Grower
Emma Henry	Berry World	Grower / Direct Supplier
Jonathan Mason	Ethical KnowHow	Ethical Consultant
Fiona McKerrow	Dole	Food Service / Direct Supplier
Shayne Tyler	TylerBladon	Ethical Consultant
Sam Zubaidi	Pro-Force	Scheme Operator
Rebecca Fitchett	Angus Soft Fruits	Grower / Direct Supplier
Lydia Tunnard	Fresca Group	Direct Supplier
Sara Gil Bishop	Driscolls	Grower / Direct Supplier
Wayne Raines	Driscolls	Grower / Direct Supplier
Claire Donovan	Worldwide Fruit	Direct Supplier
Tom Price	NFU	Trade Association
Susan Sellar	DPS	Direct Supplier
Gillian Haythornthwaite	ALP	Ethical Organisation
Kelly Shields (Chair)	FPC	Trade Association
Kate Bennett	Concordia	Scheme Operator
Karen Goode	Concordia	Scheme Operator
Naomi Pendleton	AMFresh	Grower / Direct Supplier

The wider stakeholder group include:

Tesco, M&S, Waitrose, Aldi, Lidl, Sainsbury's, Asda, Co-Op, Morrisons

GLAA, DEFRA, Home Office, Worker Support Centre Scotland,

ETI, Sedex, Stronger Together, FLEX, FNET

Legal stakeholders