

FIRE SAFETY GUIDANCE WEBINAR COMPILED Q&A

The following questions were asked during VisitEngland's Fire Safety webinars, held on Monday 18 and Thursday 21 September 2023. A recording of the webinar can be viewed [here](#) using the password FireWebinar23!

The questions have been divided into categories:

1. [General questions](#)
2. [Technical questions](#)
 - a. [Locks](#)
 - b. [Doors](#)
 - c. [Alarms & Detectors](#)
 - d. [Fire extinguishers](#)
 - e. [Exit plan, ignition source & others](#)
3. [Specific accommodation type questions](#)
 - a. [Open plan](#)
 - b. [Others](#)

Disclaimer

As a business owner or responsible person, you have a duty to comply with the requirements of the Regulatory Reform (Fire Safety) Order 2005 (As amended) (the FSO). The information contained in these FAQs is based on the author's interpretation of '[A guide to making your small paying-guest-accommodation safe from fire](#)' and '[Fire Safety Risk Assessment for Sleeping Accommodation](#)' (the Guides) and how they can be applied to holiday or short term let accommodation.

This is for general information purposes only and does not constitute legal advice. Nothing within these answers should be deemed to overrule the Guides or requirements of the FSO, and the author accepts no responsibility or liability for actions taken against businesses or responsible persons by reliance on the information in these FAQs. This includes whether or not advice has been sought from the relevant authorities, such as local Fire and Rescue Services, Building Control Bodies and Planning Authorities.

Responsible persons are therefore recommended to refer to the Guides and seek consent from relevant authorities before embarking on any project to start or extend a holiday let business. The author of this document reserves the right to change or update the information in this document at any time without notice.

By using this document, you agree to the terms of this disclaimer.

GENERAL QUESTIONS:

1. What is the main regulation change?

You need to record your Fire Risk Assessment (FRA), including your actions, plans and timeline, irrespective of the number of persons employed to work.

2. Can we do our fire risk assessment, or must someone with specific training do it?

You need to know where you need expert advice and when to assess yourself. For example, the guidance for small premises is relatively straightforward, while larger premises and more complex buildings might need more competent assessors.

If you choose to carry out the fire risk assessment yourself, it is important that you feel able to interpret and apply the guidance and recommendations to your property. However, if you do not feel confident to do so, you should engage the services of a competent fire risk assessor. Always carry out reasonable checks that the fire risk assessor employed is suitably competent.

3. Along with 4 other landlords, I'm updating my properties in line with previous regulations following a risk assessment previously carried out by a Fire Risk Assessor. Is that RA now obsolete?

If a competent Fire Risk Assessor assesses you, it should be aligned. You need to record your FRA. Previous FRAs should be kept as a record, but the 'current' or most recent FRA is the one that is the relevant document – think of it as an MOT certificate.

4. I had a very proportionate response from a fire expert for our thatched property. I was advised to inform the Fire Rescue service, but they were not interested and just gave me a leaflet. Who will be inspecting our FRA, etc.?

Contact your local fire station. They will most likely want to visit your premises for operation risk purposes. They won't be able to inspect your FRA, but if they think it appropriate, they may ask an inspecting officer to attend to give you advice.

5. I have two open-plan properties. Do I wait for the guidance to be updated from the Home Office? Or do I go ahead and get a risk assessment?

Do not wait for guidance. Any fire risk assessor is already suitable to assess according to your circumstances.

6. We have a commercial property where we are renting offices which are no longer needed. We have a Fire Risk Assessment in place for the whole building, but do our "tenants" renting individual offices (single office or company with 4 employees) require their own fire risk assessment under the new regulations, or are they covered under our one?

Each independent occupancy will require its own FRA, and there must be an FRA to cover any communal areas. The FRA for the communal areas will be the responsibility of the owner, landlord or

managing agents. All occupants must share their findings (co-ordinate and co-operate) with the other occupants.

From 1 October 2023, a FRA is required for any premises to which the Fire Safety Order applies, irrespective of the number of persons employed to work.

7. [Do fire alarms have to be serviced every six months now, or is that not a legal requirement? I get mine serviced every 12 months currently.](#)

- The [small paying guest accommodation guide](#) says, 'Any fire detection and alarm systems should be serviced by a competent contractor every six months.' This is onerous for domestic systems and is more applicable to commercial systems in hotels, etc. Still, it would be considered best practice to ensure fire alarms are subject to suitable maintenance regimes in addition to the weekly or changeover tests.
- The fire safety order (Article 17) requires a suitable testing and maintenance regime for fire safety equipment. A period in excess of 12 months for basic tests would be difficult to justify.
- The British Standard for domestic fire alarms (BS 5839 part 6) does not specifically recommend that Grade C, Grade D and Grade F systems are maintained by a competent person unless identified in the manufacturer's instructions. This says a visual inspection, cleaning, and functional testing should be done. This should be done as part of a regular maintenance regime.

8. [In some properties, it is simple enough for the responsible person to identify risks, but the solutions may need expert input \(and take more time\). Do the specifics of the mitigations need to be recorded in the FRA document?](#)

Yes. Keep the actions recorded. This should be under the heading of 'relevant information'.

9. [I'm a bungalow 3-bed B&B. Is there anywhere I would have to register my risk assessment, or do I need to show it if I ever asked?](#)

You need to keep a record and show when you are asked.

10. [Why, when building regs call for a smoke alarm on each floor, are new regulations asking for a smoke alarm in every bedroom?](#)

Yes, every rented room needs a smoke alarm. The system will need to be compliant with BS 5839:part 6, 2019, Grade D1 LD1.

On completion of the installation, contractors should provide a written statement that they have installed the system to the necessary standard. Any variations should be included.

11. [I have a small, 2-storey, 3-bed B&B and I already complete the Fire Risk Assessment via the VisitEngland website each year, has anything changed?](#)

The only change is you need to record it.

12. I have engaged a fire safety assessor with MIFireE and Tech IOSH qualifications. Are those qualifications sufficient?

Ask for references that align with your businesses, including accreditation, training courses and relevant experiences have been taken.

13. I'm from the British Holiday and Home Parks Association, and we represent caravan/holiday park owners UK-wide. A Visit England inspector has told several of our members in Cumbria that they need to install interlinked smoke and heat detector alarms in every room of rental static caravans - to be clear as a direct result of this new guidance. They would like clarification on this - is this the case?

Yes, that is correct.

14. Do I need a fire risk assessor now or when new regulations are published?

If you are a small premises, you can do it on your own. If the premises are relatively more complex, you need an assessor to ensure you comply with the regulations. However, you don't need to wait to be published.

15. If you have a few identical holiday units on one site, could you have 1 fire risk assessment to cover all, or would you duplicate a copy for each unit?

Although the results might be similar, each unit should have an individual fire risk assessment.

16. How often do we need to review our FRA?

There is no specific timescale, but you should record a review date on your FRA. FRAs should be reviewed at regular intervals (this could be annually, but not necessarily), but FRAs must be reviewed if there has been a change or reason to believe the FRA is no longer suitable. This may be following an incident or near miss.

17. Right now, how do you know whether an Assessor is competent? They all say they are, and they are members of a variety of bodies. How do we know what is of substance and the sales pattern?

Ask for references that align with your businesses, including accreditation, training courses and relevant experiences have been taken. There are Fire Risk Assessor's registers. Here is an example - <https://www.ife.org.uk/fire-risk-assessors-register>.

18. I see that finding a suitable fire risk assessor is really complicated. Is there an interactive site where one can search for assessors and check out their qualifications and past client experiences? Is there a standard form of accreditation for Assessors who can undertake Fire Risk Assessments for larger, more complex accommodation?

Yes – there are courses, and the Institute of Fire Safety Managers have a 'tier' system. There are Fire Risk Assessor's registers. Here is an example - <https://www.ife.org.uk/fire-risk-assessors-register>

19. We simply list properties. If one of our properties doesn't comply, who is liable? Us or the owner? Do you have any advice on getting owners to engage?

The owner, if they have control of the property, but letting or management agencies may have a duty dependant on their level of control. The Fire Safety Order refers to someone taking a 'rackrent'.

Saying this, *'the "owner" means the person for the time being receiving the rackrent of the premises in connection with which the word is used, whether on his own account or as agent or trustee for another person, or who would so receive the rackrent if the premises were let at a rackrent.'* (Article 2 FSO)

20. Do Airbnb properties have to have a Fire Risk Assessment?

Yes, Airbnb properties do need a Fire Risk Assessment.

21. Is there guidance on the level of training an organisation should provide to internally responsible persons in order to meet the forthcoming standard?

Not at this time, but many training providers could provide training based on the organisation's needs – an internet search using the phrase 'fire safety training' should assist in finding suitable providers.

22. Are the October legislation changes only relevant to accommodation provisions - any changes relevant to Visitor Centres, with cafes and shops?

The legislation applies to all premises where the Regulatory Reform (Fire Safety) Order 2005 (As amended) applies – so yes.

23. My property is in Northumberland, just 2 miles from the Scottish Border. Will I be able to select a Fire Risk Assessor based in Scotland?

The laws in Scotland are different. They would need to apply the English guide standards.

24. Does the guidance on fee-paying accommodation apply to facilities which accommodate people but not fee-paying?

If the venue operates as a business, and some may define this as the ability to stay at the premises by booking or knocking on the door, then yes, the guide is likely to apply. Other standards may apply if the premises are operating as a shelter or charity, but they are likely to be very similar.

The key point to consider is whether the person or persons staying on the premises are considered a relevant person and whether the fire safety order applies. The FSO applies to any premises which is not a single private dwelling (house or private flat). A relevant person is anyone who is legally on or in the vicinity of the premises.

25. Where to get a decent assessment template? I have a five-bedroom guesthouse over three floors.

<https://www.gov.uk/government/collections/fire-safety-legislation-guidance-for-those-with-legal-duties>

26. I had a local fire safety company come into my property to advise earlier this year. They put extinguishers and blankets in. They said these were required on escape routes. How do I choose an appropriate company to offer up-to-date advice?

Have a background check to determine whether the company has experience with similar premises.

27. Our holiday apartment is in a block of flats. Are we only responsible for fire safety in the flat itself, as the communal areas are the responsibility of the Freeholder/Managing Agent?

The building owner/management should be responsible for communal areas, and the fire strategy should be communicated to the flats. Flat owners are responsible for FRA within their premises.

28. Do we need to document weekly fire tests?

Yes

29. Do the various weekly checks (fire alarms, torches, etc.) need to be completed when properties are unoccupied (e.g., wintertime)?

It is unnecessary to complete checks when the property is not in use, though this may make some small faults worse and more expensive to rectify. However, checks must be completed before re-occupation, which may require re-certification and re-commissioning.

If you decide to omit checks during the closed season, this should be detailed in your FRA.

30. A fire risk assessment happened last year at our property, and the fire brigade team did it. The property is an 11-bedroom B&B. Do we need to do it again this year? Do we need to do it yearly or only when we update something structurally in the building?

It is very unlikely that the fire brigade team did a FRA. This would have been a fire safety audit, which is entirely different. If this is the case, you will need to complete your own FRA.

An update only needs to be completed when there is a significant change in the exterior and function of the building, assuming the current assessment had been carried out correctly and actions were taken.

31. We have a three-storey property and had a professional Fire Risk Assessment produced in 2016. We worked through the action plan and formally reviewed the FRA each year. At what point would we need a completely new FRA done?

When a change on the building or function of the property is taken.

32. I've been informed that it's possible to paint our doors with fire retardant paint instead of replacing them with certified fire doors. Is this correct? Does such a paint exist?

Yes – please complete a search on the internet using the phrase – ‘intumescent coating for fire doors.’

33. Are there any changes in emergency lighting regulations? We have monthly and annual testing completed, and failure changed for new. Is there anything else to consider?

No – this is an appropriate testing regime.

34. It raises the question of differences of opinion in interpreting the guidance from registered Fire Risk Assessors - where does that leave an owner if the Fire Service visits and then disagrees?

Competent Fire Risk Assessors should give advice or solutions which will be accepted by the Fire Service by complying with the guides/standards. Where the advice deviates from standards, this needs to be made clear in the FRA, and the assessor should advise you to seek approval from the relevant authorities. Fire Risk Assessors have a duty to provide competent advice and can be prosecuted if the FRA is not suitable and sufficient.

It is mandatory to record your FRA moving forward, including plans and actions taken.

35. When does a B&B become a hotel in fire legislation?

The legislation is the same for both – the fire safety order. The guides for each depend on the property size but are most likely to be the Sleeping Risk guide if there are more than 4 bedrooms.

36. Are there any grants for this?

There are no grants for this, as the regulation has been in place for almost 20 years. The only change is to record the FRA.

37. Would you advise similar regulations on Shepherd's Huts as bell tents/caravans?

Yes. The regulation applies. If you rent out the tent, you still need to complete a fire risk assessment, but it should be very simple, ensure you can raise the alarm in case of fire so that all persons can get out safely. For a bell tent or similar, you are unlikely to be able to provide mains wired fire alarms. In this case, a battery-operated smoke alarm will be acceptable. You will need to consider emergency lighting; this could be a torch fixed in a suitable location.

38. In standard building regs, all fire escape routes are related to the escape distance. Why is that not taken into account here?

The travel distances are covered in both guides.

39. This is referred to as 'guidance', which to me indicates it is voluntary, as opposed to regulations which are mandatory.

This is a statutory guidance. Not complying can be a breach of the order.

40. How do we find a competent, legitimate fire expert to conduct an FRA who won't rip us off?

Do the background and sense checking and price comparison on the services.

41. A competent person should undertake FRAs. How can individual owners and managers determine this without experience in this field?

The guidance for small premises is straightforward. However, you may need a competent Fire Risk Assessor for more complex premises.

42. Can we see any examples of completed VisitEngland fire risk assessment templates? I cannot find any cottages with completed FRA online.

We do not provide completed FRA due to the different circumstances of each premise.

43. What do you expect the cost of small premises, e.g., 2 bed flat to 3-bedroom house, to become compliant?

It can range between £250-£300. However, price comparison and checking should be taken individually.

44. Are you going to offer advice on 3-storey cottages? The 'sleeping accommodation' guide seems more geared towards hotels and HMOs.

Depending on the building, 3-storey cottages can be as complex as HMOs or hotels or closer to small premises.

45. Can a fire risk assessor give you a fail if your doors are historic and not fire doors, and if so, do you have to close your business?

The Fire Risk Assessor evaluates and gives feedback on how your premises can comply with the fire safety regulations.

46. Should an incident occur, who would be liable for prosecution should the FRA be considered inadequate?

It depends on how the FRA was taken, by whom, and the measure the premises' owner took.

47. Why do we need a smoke alarm in a bedroom in a small cottage where it is just outside the door in the access corridor outside the door? It is so loud you would easily hear it.

The principle is to prevent any specific circumstances that may jeopardise the safety of the person staying.

48. When / how will the inspections be rolled out?

The inspections are already part of the Fire and Rescue Services tasks. The regulation has been established for almost 20 years.

49. Are there any changes to the training requirements for hotel staff?

The training requirements have not changed.

50. We have houseboats (floating) and land-based glamping pods. Presumably, this guidance will apply to us too.

Yes, it will.

51. When will the updated guide on larger accommodation and properties that do not fit the Small Accommodation Guide be available?

There is a guidance for sleeping accommodation that is already established.

52. Is there a legal requirement on how it is recorded?

It should be in a format that is accessible and available for inspection when requested by an authorised inspector (normally from the fire and rescue service – they should carry identification and a fire safety inspector's authorisation card).

53. To what extent do regulations apply to the main house if it is a self-contained (but adjoined) annexe being let out?

The regulations would not normally apply, but if a fire in the main house was likely to affect the self-contained unit, this must be considered regarding fire separation – fire doors and raising the alarm in case of fire – sounders in both areas or one fire alarm system.

54. I visit my property once a month and check my alarm system then. Should I be employing someone to do it weekly?

To comply with the guidance – yes. Who cleans your property, and what changeover checks are completed?

55. Is PAT testing mandatory every year?

Not necessarily yearly. Make sure to manage any potential ignition sources. Insurance cover is to be factored in, for example, a maximum every two years.

56. What is an acceptable timescale to have all requirements completed?

There is no strict timeline. Only mandatory records for FRA have been taken, plans in place, actions taken, timescale, and follow-through, with a proportionate approach.

The answer would be as soon as reasonably practicable. This does not specify a time but ensures that weak or lame excuses for not doing the work are not used.

All fire risk assessments give a schedule for when works need to be completed, starting from immediate to 3 months, 6 months, 9 months, 12 months and as part of a programme of works. Assuming the works are required because of fire safety deficiencies, the fire risk assessor should consider the impact of fire when making recommendations. If works are unnecessarily delayed, then the fire service will take action.

The fire service can also require works to be done. When the fire service requires works to be done, they give timescales (in Enforcement Notices), which consider how long it would take to complete the work, considering the planning, procurement, installation and commissioning times. This will be similar to the schedule fire risk assessors use. However, the fire service can restrict or prohibit the use of the premises until works are completed if they think someone is at risk of harm in the event of a fire.

If so, the business may use interim measures to lift the restriction/prohibition notice. An example could be restricting the use of bedrooms because of inadequate fire alarms (smoke detectors). The fire service may require a mains wired system to be installed in 3 months, but then accept a battery-operated system to allow the bedrooms to be used while waiting for the mains wired system to be installed.

It is up to the business owner to introduce interim measures. Still, they would not be able to use the prohibited area until the matters identified (as deficiencies) have been remedied.

57. Is the local fire brigade obligated to assess if asked?

No

58. Is there an app or a tool available that we can use to complete the initial assessment?

You could try 'iAuditor'.

59. If new guidance is being published early next year, including 3-storey properties, will a fire risk assessor I'm employing now to ensure I'm compliant know what that guidance is? I don't want to change all my fire regs and then need to change again in 2024.

Competent Fire Risk Assessors are capable of conducting a FRA.

60. I work in a grade 2 listed castle, which is very different from regular premises. Where can I find guidance relevant to fire safety?

For owners of heritage buildings wishing to see what is possible, the '[Fire Safety Management in Traditional Buildings](#)' guide published by Historic Scotland is a very helpful reference source.

61. If you wish to complete your own assessment, is there any way to validate this?

Not really. You could ask someone to check thoroughly to see if they agree with your findings, but without experience, this is not recommended and is subjective.

62. Do we need a formal electrical certificate, or is it enough for an annual check by an electrician?

Electrical installations should be checked every 5 years, but other electrical equipment may be subject to more frequent checks depending on the manufacturer's recommendations and the use of the equipment. All checks should be completed by a competent person, and records of checks should be maintained.

63. I'm in the process of buying a property for FHL and wonder at what point to get the assessment done as I want to make some changes and will also need to for the fire regs. Do I have to pay for an assessment twice?

Your solicitor should request information from the seller or agent on compliance with fire safety regulations based on the current use. You should complete the FRA immediately after the purchase or before occupation.

64. The FRA has to be displayed on the property. Presumably, we keep a copy, but if a fire occurred, the original could be lost in that fire. Who's to say it hasn't been done?

The FRA is to be recorded, which means it is written down so that when an inspection occurs, there are records of FRA taken, plans in place, action taken, timescale and follow-through.

TECHNICAL QUESTIONS:

LOCKS

1. I'm worried that thumb-turn locks aren't safe for young children, who could easily open them without adults being aware. Is it possible to instead have a spare key next to the door in a 'break glass in case of emergency' box?

The locks on exits must comply with the fire safety requirements, and if there are concerns for the safety of children, then a suitable approach which doesn't compromise the exit and requires a key to exit may be all that should be said. Break glass key boxes are not appropriate.

If more is needed, then [some alarms](#) can fitted to the exit doors.

2. The thumb latch exits with a lockable door. How does this work?

[Here](#) is a link to information about thumb-turn locks.

[Here](#) is a link to the different types of thumb-turn locks.

These links are provided for information only and do not indicate a recommendation.

3. Thumb-turn locks are new to me - how do they link with the standard Yale/mortice locks we have for security and insurance purposes?

Thumb-turns for different types of locks are available - they can be found online. Search 'thumb-turn for exit doors.'

4. Will the use of thumb-turn locks meet the insurance requirements for 5-lever locking on exit doors?

You can get thumb-turns which comply – see the link in a previous response.

5. Are thumb-turn locks needed for external doors? Does this include a door that is a French door?

Any door that is designated to be used as a fire exit door will need a suitable opening mechanism. Thumb-turn locks are recommended for FHLs.

6. Adults may also be wheelchair users, so height is important for them - too high thumb-turns may not be suitable.

Any door-opening device would need to be reachable and useable by anyone likely to use it. If persons with disabilities are guests, their needs will need to be included in part of the [DDA risk assessment](#).

7. One of our doors is a full-glass pane, and I don't want to fit a thumb lock because of the security risk. The main exit from upstairs doesn't run through this door, so can I get away with a break-glass key box in that case?

This question cannot be answered without seeing the means of escape for the whole building, but there are two points to make about these questions.

1 – you are not trying to 'get away' with something. You are seeking to comply with relevant fire safety legislation, there are no short cuts, but there are proportionate and practical solutions.

2 – security need only be an issue when the premises are unoccupied, requiring guests to lock them securely whenever they leave. Thumb-turns are as secure as any lock. Accessing the inside of the door would require another access point or physically breaking into the premises.

8. We have a 400-year-old historic front door on our listed property. A thumb-turn latch is not feasible. We do chain a key to this door. Is that OK?

This is not an acceptable approach, but thumb-turn locks are not the only available solution. For situations of this nature, it is advisable to contact [Historic England](#) for advice.

9. The easy route out is via the main patio sliding doors. How do you fit the turn lock to these?

Most modern locks can be adapted to have a thumb-turn or lever to unlock without using a key. These are usually quite simple to install. However, if you are not confident, you should contact a specialist locksmith or lock provider to explain your requirements. If you know the make and model of your current lock, you could research the internet to find a replacement. The staff at DIY stores are usually very helpful.

10. If the key is left in the lock and guests are told to leave it in the lock, does that negate the need for doors with thumb-turn locks?

No, this does not negate the need for a thumb-turn lock (or other suitable opening mechanism). Keys can be removed and lost, so it cannot be guaranteed that the door will be openable at all required times.

11. Thumb-turns are on the upper part of stable doors (exit doors) on two of our cottages. Is it acceptable to advise guests not to lock (Yale) the bottom part of the door during their stay?

Yes, the Yale lock should be held in the open position when the guests are on the premises.

12. We cater for care groups with adults and children with special needs, and thumb-turns on doors have in the past led to them leaving their small holiday let overnight and causing a security concern. Is it suitable to lock these premises with a key left at the carer's discretion instead of a thumb-turn?

This has been covered in an earlier answer – consider installing [alarms](#) on exit doors.

13. Small premises PVC patio doors have a keylock, so please advise what lock would need to be fitted to make this fire safe.

These doors are generally very easy to change to a thumb-turn lock. Check out 'euro key and turn cylinder' via an internet search.

DOORS

14. Please could you clarify the situation about the fire doors? How do I know if I need to replace this?

This is a complex area. Please see the [PASC fire safety paper](#). Start from page 9.

15. The Home Office guide refers to 44mm solid doors. Our solid doors (as much as you buy) are 35mm - is that OK?

The fire doors can be 35mm doors. They are made. [Here's](#) an example.

If new fire doors are provided, ensure they are fitted per the specifications on the certificate that comes with the door (it may need to be downloaded). The fire strips may not come fitted to the door, so they will need to be fitted into the frame.

Check the certificates and inform them to the door installer.

16. Is a fire door between the bedroom and the open plan living space necessary? Would a surface treatment be sufficient?

Open arrangements are not compliant, and if the exit from the bedroom cannot be made without passing through the living area (access room), then alternative arrangements will be required. These cannot be specified here but suggested mitigations are outlined in the [PASC fire safety paper](#). See '*The use of compensatory measures when traditional fire safety solutions cannot be applied*' from page 8 onwards.

17. Guidelines on self-closing doors. Are they necessary?

Not necessarily for small premises, but they are advised.

18. Is it essential that escape doors/exits open in the direction of travel, i.e., on exiting the building? The current door opens inwards.

No, exit doors can open inwards, though note that they need to open outwards when more than 60 persons are in the building.

19. What are the rules concerning interior doors in a small single-storey and also a 2-storey holiday let, and exterior doors?

Single-storey buildings are not covered in the guide, but the standard should be the same as for a flat.

- Notional 30-minute fire-protected entrance hall, but with no requirement for them to be self-closing.
- Doors to bathrooms, toilets or cupboards are not required to be fire doors.
- Guests should be instructed to close the doors when sleeping.

If the single-storey building is open plan, then any cooking facilities should be located remote from (and not immediately adjacent to) the entrance door so as not to prejudice the escape from sleeping areas in the event of a fire, the distance to escape from the furthest point in the bedroom should not exceed 9m.

For a two storey house:

- The entrance hall and stairs should be a notional 30-minute fire-protected escape route.
- Doors opening onto the protected route should be notional fire doors but do not need to be self-closing.
- However, doors to bathrooms, toilets or cupboards are not required to be fire doors.
- Guests should be instructed to close the doors when sleeping.

20. We have lots of listed properties in Bath. Can we use intumescent paints on listed doors and add intumescent seals - are door restrictions with shallow panels?

There are some limitations on what can be done to any door to upgrade it to a fire door.

You should not carry out any works on listed buildings without consent. For information about upgrading heritage doors, please see the [guidance provided by Historic England](#).

21. How do we stand with door chains?

It is not acceptable as a means of escape when the premises are occupied by staff or guests.

22. Should all internal doors be fitted with door closures to protect escape routes?

This is unnecessary for premises coming within the scope of the small paying guest guide.

23. Should all fire doors and windows open outwards? Must fire exits have panic bolts fitted?

No – see the previous answer on this. Panic bolts are not required. Panic bolts would not normally be fitted to exit doors in self-catering premises. They could prove difficult to maintain and be opened in error.

24. What is a nominal or notional fire door? Presumably, in a historic building, it is impossible to put in fire doors where the openings are very unsquared?

There are confusing definitions, but [this link](#) covers it well. In brief, a 'notional' fire door, according to advice by the UK Government, is a fire door that satisfied the standard applicable to fire-resisting doors at the time of the building's construction. This door type may not have been fitted with intumescent strips and smoke seals.

According to the same UK Government advice, an 'upgraded' fire door is a notional door that has been upgraded by fitting, for example, intumescent strips, smoke seals and a protected letter box.

A nominal fire door has no evidence of fire resistance performance, so we rely on the opinion of the inspector or assessor in terms of its likely performance.

Fitting doors in unsquared openings will be a matter for a competent carpenter and door installer. Following an agreed process, this would result in a 'nominal fire door'.

25. Can a sliding bedroom door meet the regulations? There isn't room to have an opening door.

Yes, so long as the opening process is clear (signed), it is only going to be used by the persons in the room to leave, and the door meets the fire-resistant requirements where required. It should be noted sliding doors are generally not accepted on escape routes because they can confuse persons who are unfamiliar with the door. In a fire situation, they will try to push or pull the door rather than slide. For this reason, it was appropriate to ensure the door was well-lit and provided with emergency escape lighting.

26. Do all doors have to be fire doors? Do we need thumb locks on the doors?

Doors on escape routes need to be fire doors or notional fire doors. See earlier answers.

Thumb-turn or opening systems that do not require a key and are simple in operation must be fitted to all doors on escape routes. This will include bedrooms, where they can be locked.

27. We have Victorian decorative internal doors - do we need to replace all of these with modern solid doors that will detract from the character?

There are procedures for upgrading doors. Please see the previous answer for more information.

28. My local fire service told me that paint can be placed on historic doors to make them fireproof. Is this true? Does this work well enough for a fire door, for example, on a bedroom door?

Some intumescent paints and systems can be applied to existing doors. This is covered in a previous answer.

29. Do fire doors need to be self-closing? Thumb-turn locks worry me due to small kids opening and leaving the premises.

No – this is covered in an earlier answer. For thumb locks – security has been covered in a previous answer.

30. We have a solid oak brace and ledge doors in our old historic properties. Handmade and beautiful. We do not want to replace these. Do we have to?

Guidance on these doors is provided on page 5 of [this document](#).

31. Can you have glazing on any internal doors?

Yes, but you would need to comply with health and safety (to prevent injury from someone falling through it) and fire safety for fire spread and protection of means of escape, so make sure the person supplying the glass knows where and why you fit it.

32. Our doors are solid framed 6-panel doors - are these acceptable?

They will need to be assessed – see page 9 of [this document from PASC](#).

33. In a small cottage with short travel distances (down the stairs and then about 4m through the living room to the exit door), do the doors to the two bedrooms on the first floor need to be replaced with FD30s?

That depends – they be classed as notional doors but they will need to be assessed. See page 9 of [this document from PASC](#).

34. Back to Fire Doors - you mentioned reading the existing papers for advice. There are so many on the PASC site. Can you point to the relevant one, please?

Start from page 9 of [this document from PASC](#).

35. Do external doors need to be fire doors if they are 44mm thick? As our doors are heavy wooden or uPVC doors.

External doors exit doors rarely need to be fire doors, so it is very unlikely you need to do anything to the doors other than provide a suitable opening mechanism – thumb-turn, for example.

36. If a house has a lower ground floor (not a basement) and therefore has street entrances on two different floors (built into a hill), does the guide apply?

The [small paying guest guide](#) applies to buildings up to 2 storeys, so if the building is no higher than this, then yes, your description would indicate the guide does apply.

37. The guide says notional fire doors are acceptable. I understand notional doors to satisfy the standard applicable to fire-resisting doors at the time of the building construction. Does this mean that in a cottage that is 200 years old, the original doors are acceptable?

The doors would need to be assessed. See page 9 of [this document from PASC](#).

For very detailed information on upgrading historical doors, the '[Guide to the fire resistance of Historic timber panel doors](#)' should be referenced.

38. Is using a bolt that can be pulled back for an external door, OK?

This should not be the default solution, but it could be acceptable if there were no alternatives. The bolt would need to be easy to use and at a suitable height.

39. Are there door levers that can be fitted over a key inside an exterior door?

There are options available for 'keyless exit door locks', but because of the varying situations, this would need to be researched by contacting specialist locksmith or lock providers to explain your requirements.

40. Do all doors in the property have to be fire doors?

No – this depends on the location and the risk of fire starting behind it. The [small paying guest guide](#) says this in relation to a two-storey house:

'The entrance hall and stairs should be a notional 30-minute fire protected escape route. Doors opening onto the protected route should be notional fire doors but do not need to be self-closing. However, doors to bathrooms, toilets or cupboards are not required to be fire doors.'

ALARMS AND DETECTORS

41. Do fire alarms have to be mains wired (or will they need to be in the not-too-distant future)?

Fire alarms have to be mains wired—the battery-powered is only applicable in specific circumstances. Please see the previous answer to this.

42. Are 10-year non-replaceable battery-operated radio-linked smoke & heat detectors suitable for installations complying with BS5839-6 Grade F1 acceptable under the regs rather than hard-wired?

Preferably, all smoke and heat alarms should be mains powered with a tamper-proof standby power supply consisting of a battery. These are technically known as Grade D1 alarms. However, long-life, sealed battery alarms (known as Grade F1 alarms) may be acceptable as a short-term measure for around 2-3 years.

This is a false economy, so it is not advisable unless the installation is required urgently.

43. How can smoke detectors be provided with no mains electricity in the unit?

This is where an exception can be made, and Grade F battery-operated detectors can be provided. If more than one is required (i.e. there is more than one habitable room), they must be wirelessly interlinked.

44. Should smoke alarms be linked so that if one is triggered, all sound the alarm?

Yes – absolutely.

45. Utility room - heat detector, or heat and smoke detector?

A smoke detector, or multi-sensor, which is a combined heat and smoke detector designed to reduce false alarms using algorithms.

46. If there are existing smoke alarms on the landing outside the bedroom doors, do we need to install additional alarms inside the bedrooms as well?

Yes – they must all be interlinked, so if your existing detectors are not compatible with the new detectors, they will need to be replaced. The system should meet the requirements of BS 5839-part 6 Grade D1 LD1.

47. We have 3 small one-bedroom cottages. Do all alarms need to be main supply and interlinked, or can 1 be hard-wired, and the remaining be radio interlinked, or can they all be radio interlinked?

They all need to be hard-wired – see earlier answers.

48. If I have a boiler in a bathroom, do I need any fire or carbon monoxide detection?

Carbon monoxide might be needed, depending on the circumstances.

49. Regarding testing of smoke alarms, the new guidance says they should be checked on the day of every guest's arrival. Doesn't this seem excessive? How would this work for key-pad entry?

The guide says they should be checked at 'changeover'. This is understood to be when the premises are cleaned and prepared for the new arrivals. This may not necessarily be the day the guests arrive. If you employ someone to clean your premises, you could ask them to do the basic fire safety checks if you cannot do them yourself. PASC have provided an [example of a checklist](#) you could use.

There is also [a short guide on the checks and routine testing](#).

Note: The advice for checking is 'at changeover, once a week, whichever is sooner'.

50. We are fitting interlinked smoke, heat and CO detectors. Do they have to be 10-year lithium battery backups, or are the 9v battery backups sufficient under the guidance?

The smoke alarms should be mains wired and interlinked to each other; this could be wireless/radio linked. Battery back-ups are only acceptable for a short-term solution (2-3 years), so it would be a false economy. The standard required is Grade D1 LD1. This is discussed in previous answers.

51. We have mains wired smoke alarms in all living spaces, hall/landing, and battery-operated alarms in all bedrooms. Is that adequate, or do bedroom ones also need to be mains wired?

All the smoke alarms should be mains wired and interlinked to each other; this could be wireless/radio linked. If the battery-operated alarms in the bedrooms aren't linked to your other alarms, this needs to be remedied.

Battery backups are only acceptable for a short-term solution (2-3 years), so it would be a false economy. The standard required is Grade D1 LD1. This is discussed in previous answers.

52. I read the guidance but didn't see that a smoke alarm is required in every bedroom. I thought it was just areas where a fire risk was identified, plus I planned to put one outside the rooms, not one in each room (3 small single bedrooms opening to the tiny hall where the smoke alarm is located). Do I need to put in 4 in total? They will all be within 2-3m of each other.

The standard required is Grade D1 LD1. This is discussed in previous answers. Examples of common layouts and recommendations on fire protection measures are provided on page 23 of the [small paying guests guide](#). Your premises will probably need to reflect example 3.

FIRE EXTINGUISHERS

53. Are there any thoughts or experience on the fire extinguishers currently on the market covering all fires?

There are fire extinguishers which are general purpose, but unless staff stay on the premises, you probably don't need fire extinguishers. If you still want to provide them, consider [these](#).

54. Is it foam fire extinguishers we need?

You do not need to provide a fire extinguisher if staff are not staying on the premises. However, if you want to provide a fire extinguisher, a foam fire extinguisher is considered a good multi-purpose one.

For more guidance, see [this guide](#).

55. Please can you advise on the best fire extinguisher for a small self-catering property - I have had conflicting advice that powder, although multipurpose so ideal, should not be used indoors as it may trigger asthma, or should we advise caution re its use inside our property is a small 1-bed cottage.

See previous answers on fire extinguishers.

56. I thought we had to have fire extinguishers on every floor, but I've just had a fire assessor who says I don't need to provide these. Please can you confirm?

You won't need to provide fire extinguishers. In England you are advised to provide a fire blanket. In Wales this is not expected. The best advice is to instruct everyone to leave the premises in the event of a fire and not to attempt to put the fire out. If you have a fire or log burner, you need to consider the fire risk and include a carbon monoxide detector.

57. We had a visit from a fire safety officer who advised us to approach fire safety companies to obtain extinguishers. Each fire safety company we have approached for advice had given us completely different information regarding the number of extinguishers required and which types of extinguishers we should have. How do we know which information is correct? The building is fitted with sprinkler systems on all floors, but the fire safety officer advised we need extinguishers throughout, too.

To answer accurately I would need to know more about this building. You do not need fire extinguishers if your premises are self-catering and no staff are there. You may want to provide a fire extinguisher in the kitchen, but it is not recommended (by this fire safety consultant) and not required in Wales.

The small premises guide says this:

Firefighting equipment

In the event of a fire, evacuating the premises is the safest thing to do and guests should not be expected to use firefighting equipment. If you have staff on the premises, or if they regularly visit the premises, firefighting equipment should be provided, and staff should be trained on how to use the equipment.

You will need to make sure that the instructions on how to use any firefighting equipment are clear, that there is a warning that evacuation is preferable, and that staff should not put themselves at risk or tackle anything other than a very small fire. In self-catering accommodation, although guests are not expected to use fire-fighting equipment, you may wish to provide a small multi-purpose fire extinguisher and/or fire blanket in the kitchen area.

58. What is your opinion on P50s and potentially replacing existing extinguishers?

Make sure to visually check that there is no damage, record and maintain, as the equipment is not a fix-and-forget.

59. Please can you clarify the powder/dry powder regulations? Are dry powders no longer allowed?

Dry powder is not allowed indoors.

60. Insurance says a water extinguisher is provided when you have a log-burning stove. Is that correct?

Not known

EXIT PLAN, IGNITION SOURCE, AND OTHERS

61. My staircase comes down into the lounge, with a front door immediately at its foot. I have a wood burner in the lounge.

Open fires and log burners are a factor, but there are others, such as electrical appliances and soft furnishings, so when there is any ignition source.

Reducing ignition sources is a suitable measure in overcoming the issues for the living room, but it is essential the kitchen is remote or separated from the exit route.

62. I understand the open plan headache for means of escape and how this also applies to staircases into just a kitchen or living area. May I check the key element making a living room an issue? Is it an open fire / combustible appliance in the room or something else?

Open fires and log burners are a factor, but there are others, such as electrical appliances and soft furnishings, so when there is any ignition source.

Reducing ignition sources is a suitable measure in overcoming the issue in the living room, but it is essential the kitchen is remote or separated from the exit route.

63. What about an exit through an open plan with a log-burning stove?

Open arrangements are not compliant, and if the exit from the bedroom cannot be made without passing through the living area (access room), then alternative arrangements will be required. These cannot be specified here, but suggested mitigations are outlined in [the PASC fire safety paper](#).

See – ‘The use of compensatory measures when traditional fire safety solutions cannot be applied’ from page 8 onwards.

64. Some of our power sockets are behind furniture, so we have extension leads available for guests - is this no longer allowable?

Ensure there is no overloading (more than 13amp of load) on the same extension lead and the lead is in a safe condition. Do not allow the leads to be covered or for objects to rest on the cables. This can result in localised overheating and fires. They should be subject to regular checks and maintenance. Cable reels should be avoided.

65. Do we need escape instructions for guests displayed in a ground-floor single-bedroom cottage?

It is good practice to reinforce the emergency procedures outlined in your information for guests by having a sign posted in a prominent position. PASC provide examples suitable for different situations on [their website](#).

66. What is the stance on window locks on the ground floor of self-catering accommodation? If unlocked, the windows can be a safety and security concern; however, they can be used as a fire escape.

Windows are not recommended as a means of escape, though they are allowed in some circumstances. If this is accepted, you must ensure the escape can be used at all times when guests or staff occupy the premises.

The guide says this about window escape from the ground floor:

‘Escape windows on the ground floor can only be considered acceptable if they are easily accessed and provide a clear opening of sufficient size to allow able-bodied persons to escape in the event of a fire in the access room. Mobility impaired people should not be accommodated in rooms where the means of escape is reliant on escape windows.’

Escape plans need to be appropriate for the whole range of potential guests, taking account of age, mobility and language. This means that allowing for escape through a window, for someone with limited mobility, is unlikely to be suitable. It is not acceptable to rely on the intervention of the fire and rescue service to evacuate guests or staff. The Guide ‘Means of Escape for Disabled People’ will help you consider the needs of disabled people.’

67. What guidance is there on the risk of guests charging electric bike batteries in the property using their own USB-type chargers, which could be dodgy?

Make all communications clear about what is or is not allowed to bring. The London Fire Brigade offer [advice on their website](#).

68. Fire Exit signs - guidance or recommended?

Exit signs are not normally required so long as the exit route is simple. Where there are alternative exit routes, signs may be required, especially if the exit route goes through a bedroom or via a route that is not on the normal route. Exit signs should comply with the Health & Safety (Signs and Signal) Regulations – pictorial running person.

69. We have fire risk assessed our properties and provide candles and nightlights in assessed safe positions and suitable safe holders. Guests are requested not to move them or introduce further candles into the properties. Guests ask for candles and do use them. If we don't provide them safely, they bring them in and stand them on saucers in unsafe positions. We have even had guests put nightlights on wooden surfaces. Hence, our assessment is to supply and be safe. Views?

My personal advice as a fire safety expert is not to provide any naked ignition sources.

70. Guidance says no candles should be provided, but we provide candles in hurricane lamps as safer than guests bringing tea lights (even though T&C restrictions, you can't control their behaviour). Is it a strict no to any candles in any form?

Fire safety regulations do not prevent the use of candles. If candles are used, this will need to be included in the FRA and the control measures detailed to demonstrate that management has considered the potential for fires and taken steps to reduce this.

71. Do I need to remove all linens from my airing cupboard, which has the boiler? Or is it enough to ensure they are not touching the boiler and it is regularly serviced?

Make sure the boiler and linen are not in contact and that it is appropriately managed. If the linen cupboard has a boiler or other ignition source and is on the means of escape, it should be a notional fire door. It may also be worth considering installing a smoke detector - especially if the door is not a fire door. If the boiler is a gas boiler, it will require a carbon monoxide detector, which can be in lieu of a smoke detector if it is linked to the fire alarm system.

72. Is there a minimum distance between the end of the stairs and an escape door? I.e., stairs going down to the kitchen but one step to the door to the outside.

The maximum travel distance for premises that come under the scope of the '[small paying guests guide](#)' is 12m, from the furthest point in any room, where there is an escape in one direction only.

The distance from the bottom of the stairs to the exit door is immaterial if the kitchen is at the base of the stairs and open plan. The products of a fire (toxic smoke, heat, and flames) in the kitchen can easily travel up the stairs to the bedrooms, preventing safe escape. If the kitchen cannot be separated from the staircase, compensatory measures are likely to be required. These are discussed in [the PASC publication](#), the information starts from '*The use of compensatory measures when traditional fire safety solutions cannot be applied*' on page 8.

73. Are Balconies with rope ladders a route for escape, accepting that this would affect bookings as described around window exits?

This would not be acceptable.

74. Two-bedroom cottage, what lighting is required on the escape routes?

There is no requirement for emergency escape lighting within the cottage/house, provided that there are torches in each bedroom or plug-in night lights within the stairs and entrance hall.

75. Does a chimney sweep certificate need to be done annually?

The guide says that if you have open fires or log burners on your property, you need to consider the following measures:

- A fire/spark guard should be provided.
- The chimney should be swept at least annually.
- Where necessary, spark arrestors or bird guards should be provided (e.g., properties with a thatched roof)
- The hearth size should be adequate to prevent rugs and fabrics from touching hot surfaces.
- Any dry wood, kindling and firelighters should be stored a safe distance from heat and hot surfaces.
- Metal ashbins should be provided.

Appropriate instructions should be given to all users, and suitable procedures should be put in place.

SPECIFIC ACCOMMODATION-TYPE TECHNICAL QUESTIONS:

OPEN PLAN

1. The main concern is if a cottage has an open plan downstairs and no door at the bottom or top of the stairs (but doors on the bedrooms). Is there any way to mitigate that risk?

If the open plan area cannot be separated from the staircase, compensatory measures are likely to be required. These are discussed in [the PASC publication](#). The information starts from 'The use of compensatory measures when traditional fire safety solutions cannot be applied' on page 8.

2. You mention open-plan properties. Does this include wooden cabins with an open plan living area with separate bedrooms and bathrooms, with only one exit in the living area?

Yes – though it is acknowledged that escape travel distance is short, and early warning in case of fire should result in the occupants being alerted and making steps to evacuate. The kitchen/cooker should not be near the exit door. This is similar to the [guidance for open flats](#) – example 1 on page 23.

Where this is impossible to achieve, compensatory measures could be considered. This may include installing controls on the cookers that turn off the power if left unattended and timers to cut the power between normal sleeping periods – e.g., 23.00 to 7.00 hours.

If window escape is being considered, this needs to be included in the information to guests, and external escape routes suitable. All safety measures must be included in the FRA.

3. We have cabins in the woods, no power, and an open plan downstairs with a mezzanine with double bed only. Do we use the small properties template for fire risk assessment?

Yes – the principles can be applied. This has been covered in a previous answer.

4. In the "open plan" scenario - would this apply to a single-floor glamping pod, for example? The bathroom and bedroom would be towards the back, and the kitchen/living area at the front where the entrance door is. Does this fall into the open-plan scenario?

Yes - This has been covered in an earlier answer.

5. We have a three-bed holiday let property with a smoke alarm (wired in with battery backup) upstairs (open plan living area) and downstairs in the hall. Do we need additional alarms in each bedroom?

Yes – this has been covered in an earlier answer.

6. We have a single-storey villa with an open plan lounge diner, with two bedrooms off a short hallway. Fire detection fitted in open plan lounge diner. I'm under the understanding that bedrooms will require a fire detection system fitted despite being no more than 3-4 metres away from the current detection fitted. Is that correct?

Yes – this has been covered in an earlier answer.

7. We have a 2-bed property, bedrooms on the ground floor within 3m of the front door, open plan upstairs. As part of our FRA, we have decided to install FD30s on the 2-bedroom doors (currently solid but only 36mm wide). Do we need closers on fire doors or not? In our opinion, it detracts from a homely feel and feels like a hotel. Guidance is not clear.

You do not need self-closers. Refer to section 7 of the [small paying guest guide](#), example 4:

- The entrance hall and stairs should be a notional 30-minute fire-protected escape route.
 - Doors opening onto the protected route should be notional fire doors but do not need to be self-closing. However, doors to bathrooms, toilets or cupboards are not required to be fire doors.
 - Guests should be instructed to close the doors when sleeping.
8. While our 3-bed B&B guests exit down the stairs straight at the front door, in the back of the B&B in the owner's accommodation, we have an open plan kitchen, private living area bedroom and bathroom with 5 different exit doors. Can we still do the small guide?

If the kitchen is in the private accommodation and guests don't need to exit via the kitchen, and if the B&B is no more than two storeys, yes.

You will need to take account of how the alarm is raised and ensure everyone is alerted in the event of a fire. This is covered in an earlier response.

9. I have open plan accommodation that is up one set of stairs. The entrance door is directly at the bottom of the stairs, kitchenette to the left of the room entrance, with a shower & toilet room set back from kitchenette area & also to left of the stairs.

You will need to resolve the open-plan escape route. There may be compensatory measures – this has been covered in another answer. See the [PASC paper](#) from page 9 onwards.

10. Stairs in a 2-storey cottage lead to an inner hallway on the ground floor from which there are doors to all rooms, excluding the kitchen, via an archway. If we were to block the archway into the kitchen with double glass fire doors and then make the escape route from the stairway/inner hallway via the lounge, which has a door to the garden/street (so the route would be from the hallway via door into lounge) could this be an answer to the “open plan”? The living room has a gas fire in but could alter to electric.

It is difficult to provide assured advice regarding this, but as described, this could be a solution. It would be advisable to maintain two exits from the ground floor hallway, one through the kitchen with the new fire doors and another through the lounge. This would ensure if there was a fire in either room, persons evacuating could choose to exit via the unaffected room. All doors (from habitable rooms) on the exit route would need to be rated as fire doors (notional or FD30S), and locks on exit doors easily opened.

11. Our lounge has no door but an archway next to the main front door and stairs. Do we need to put a door there?

Probably, but it depends on what fire risks and hazards are in the lounge and whether the lounge is connected to another risk room, such as the kitchen. Check out other answers about open plan lounges and compensatory measures already covered in previous answers.

12. I have a two-storey terraced house. The lounge is open to the stairs and front door, and the kitchen and back door are also accessed through the lounge. Do I need to consider this an open plan, as the lounge cannot be shut off? The front door is open to the lounge, and the back door access requires going through the lounge.

Yes, this is an open plan arrangement. Please refer to the previous answer.

13. So many properties have open-plan kitchen/living areas. My stairs are also open plan - converted granary building. Do these changes mean that open-plan buildings are not now acceptable for letting?

The regulation is about fire safety and applies to any short-term rented accommodation. It means open arrangements are not appropriate for the short-term term let, and appropriate measures are required to resolve this. This has been discussed in previous answers.

OTHERS

14. We run a small 5 bed 11-person 2 storey house B&B. Can we still use the small building guidance?

This is outside the scope of the small sleeping guests guide. So, you should use the larger '[sleeping premises guide](#)'. However, the standards for this type of premises should not be too onerous. In fact, they are very similar. Page 97 of the guide discusses two-storey premises where 'no floor exceeds 200m²'. If your premises fit this description, you could apply the standards detailed here. It should be noted that this guide is being updated, and though the changes may not be too significant, the standard quoted for the fire alarm system in the current larger sleeping risk guide is lower than the standard for self-catering holiday lets. This is because the British Standard for Fire Alarm Systems BS 5839 part 6 was updated in 2019, and the large Sleeping Risk guide was published in 2006.

Therefore, when applying the guide, you should ensure the standard for your fire alarm is Grade 1 LD1 because it is very likely the revised standard will require this. Guidance on this standard has been provided in previous answers.

15. How do we apply the regs to a bell tent?

If you rent out the tent, you still need to complete a fire risk assessment, but it should be very simple: ensure you can raise the alarm in case of fire so that all persons can get out safely. For a bell tent or similar, you are unlikely to be able to provide mains wired fire alarms. In this case, a battery-operated smoke alarm will be acceptable. You will need to consider emergency lighting; this could be a torch fixed in a suitable location.

16. I have a Victorian cottage FHL with planked and ledged doors to the bedrooms. These give on to the short staircase to the ground floor. I commissioned an FRA, and the assessor indicated I would have to replace these with fire doors - as I would also have the doors to the kitchen (which has a glass panel in the upper half of the door) and the door to the sitting room. This is going to be very expensive! Does this sound correct?

Unfortunately, yes, this is the correct advice. [This guide](#) discusses upgrading existing doors and refers to ledged and braced doors. They are very difficult to upgrade and perform poorly in a fire.

17. Guidance is for 2-storey buildings - our property has 3, but we live on the top floor and only have guest rooms on the second floor. Is the guidance right for us?

This is not a straightforward situation to give an answer. This would be outside the scope of a small paying guest guide based on storeys; however, the large sleeping premises guide does not cover owners living on the top floor, only providing an example of single staircase 3-storey accommodation where guests occupy all floors. The requirements for this are more onerous than would be considered appropriate for your arrangement, so it could be justified to use a blend of the standards to achieve the most suitable outcome. For example, install a Grade D1 LD1 fire alarm system throughout the premises, so in the event of a fire, everyone in the building is alerted, have a simultaneous fire evacuation strategy, provide suitable emergency escape lighting – torches and night lights, ensure fire doors (could be notional fire doors) are provided on all escape routes and have suitable opening mechanisms on all exit doors – thumb-turns for example.

You're advised to seek competent advice and include justification of the approach taken in your FRA.

18. We have a reverse-level barn conversion for 2 adults. There is a small change in the level of 4 steps on the upper floor. Does this make it a 3-storey building or 2?

Not in my opinion – this is a two-storey building.

19. Shepherd hut tiny homes - with kitchens inside?

See the earlier answer. Yes – though it is acknowledged that escape travel distance is short, and early warning in case of fire should result in the occupants being alerted and making steps to evacuate, the kitchen/cooker should not be near the exit door. This is similar to [the guidance](#) for open flats – see example 1 on page 23.

20. Still on doing FRA by oneself, if my facility is complex and I can study the guidance, understand it and apply it to the extent of complying with the law, does that suffice, or do I need to hire a fire safety assessor?

You can complete the FRA yourself, but if you do decide to complete the FRA yourself and do not achieve the necessary standards, you could be liable for enforcement action. Still, more importantly, you could be placing your guests and staff at risk of injury or death in the event of a fire.

“If you choose to carry out the fire risk assessment, it is important that you feel able to interpret and apply the guidance and recommendations to your property. However, if you do not feel confident to do so, you should engage the services of a competent fire risk assessor. Always carry out reasonable checks that the fire risk assessor employed is suitably competent.”

There is guidance on completing a FRA in the [PASC fire safety paper](#) on page 7 onwards.

21. Like many others, we have a 300-year-old stone property, not listed. But every doorway is wonky and non-standard. Briefly looked at the regulations, and there is no way we can afford to replace all the doors with fire doors.

Dealing with heritage doors has been covered in an earlier answer.

22. We have a stone-built, 200-year-old, 2-bedroom cottage. The partition wall in our lounge is made of wood panelling. It's solid wood to the same thickness as our solid wooden doors. However, it is on one side of the stairway on the other side. Do I need to use some intumescent coating on the lounge side? There is a wood-burning stove in the lounge.

This depends. The wall will need to be accessed to confirm that it would be likely to keep a fire from breaking into the escape route for 30 minutes. This is difficult to prove for existing walls, especially in older buildings, so a visual check would need to confirm surfaces are in good condition, with no holes or cracks. Solid timber has good insulation and integrity levels, depending on thickness. The [Historic England guide](#) gives examples of burn times based on thickness. This paper may be useful for assessing the panel's existing fire-resisting capabilities. See tables 2 and 3 starting from page 11. You should always seek competent advice.

23. Should we use Fire Exit signage on all exits from the holiday buildings? Do we need an assembly point? We have a courtyard of farm buildings that are converted into holiday lets.

Signage is not always required where the exit routes are simple and not too long. However, signage should be provided where there is an alternative or lead through another room, for example, a bypass door in a bedroom. This has been covered in another answer.

24. We have a 3-bed 18C cottage. The staircase is open tread to the living room. They have just installed windows that allow escape through them. Otherwise, there is no escape from a fire on the staircase. What options have we?

There may be compensatory measures – this has been covered in another answer. See the [PASC paper](#) from page 9 onwards.

25. I have a small 2-bed cottage. I've had hard-wired alarms installed from day one - one on the upstairs landing, one in the dining room and a heat alarm in the kitchen - all interconnected. Do I need to have them installed in the bedrooms as well?

Yes, to comply with BS5839: Part 6:2019: Grade D1 LD1. This is covered in a previous answer.

26. I have a small two-bedroom property with the bedroom door accessing a 4-foot square landing with a smoke alarm on the ceiling on the landing. Do I really need an alarm in each room? Seems unnecessary to me.

Yes, to comply with BS5839: Part 6:2019: Grade D1 LD1. This is covered in a previous answer.

27. I'm not sure my property is 'small', which is an unexpected surprise as I assumed it was. It is a single premises, 2 storey, 5-bedroom house, 4 bedrooms on the 1st floor but it sleeps up to 12 because 2 of the upstairs bedrooms have small sofa beds intended for 1 or 2 children (but adults sleep on them). So, is the 10-person maximum an absolute? And is this the guidance I should be looking at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/422192/9281_Sleeping_Accommodation_v2.pdf

This has been covered in a previous answer, but in brief – yes. See the section of [the guidance](#) from page 97 onwards, 'Multi-storey buildings with a single stairway'. You will need to install a fire warning system to comply with BS5839: Part 6:2019: Grade D1 LD1.

28. I run 4 glamping pods, sleeping up to 4 people in each one. Do I need to have the fire risk assessments? They are 7x4mtrs with an en-suite shower room.

Yes - you will need an FRA. This has been covered in other answers.

29. So, a back-to-back cottage, with the only door out being the front door. There are open stairs in the lounge (separate kitchen). The stairs are on the opposite wall to the door, and a wood burner is in the lounge. Any advice on how to deal with this?

Without a plan, it is difficult to understand the layout. Controlling ignition sources in the lounge and reducing combustible materials should be considered. What this may involve should be included in the FRA.

30. Our holiday apartment is in a 7-floor building. We have a 'stay put' policy. Does this change anything we have to do?

You are required to provide an FRA for your FHL apartment. The 'stay-put' strategy applies to the apartment block. If the fire were in the apartment, you would not have a 'stay put' strategy for your guests. This sounds like common sense, but it must be made clear to the guests and not taken for granted. The relationship between holiday lets in blocks of flats has been covered in a previous answer.

31. Smoke alarms in a small two-bedroom cottage - if we have one on the landing directly outside the bedrooms, do we also need another one in each bedroom?

Yes, to comply with BS5839: Part 6:2019: Grade D1 LD1 – this has been covered in a previous answer.

32. We are a 2-bed Victorian cottage with a basement/cellar (used as dining space), a ground floor (kitchen, lounge and bathroom) and a first floor (2 bedrooms). An internal door separates the kitchen from the stairs and lounge. Can we use the small accommodation guidelines for the fire risk assessment? If not - what are the guidelines we should be using? Will a fire risk assessment template exist, or should we seek professional guidance?

Buildings with basements require special consideration, such as requiring fire doors protecting the upper floors from a fire in the basement, and there should be a protected escape route, so it would be advisable to consult a professional. Once these matters have been addressed, the principles in the '[sleeping accommodation](#)' guide could be applied.

You will need to install a fire warning system to comply with BS5839: Part 6:2019: Grade D1 LD1.

33. I have a small bungalow with an open-plan living room/kitchen, and the main door comes off the same room. Would I be OK with one central smoke/heat alarm?

No – you are required to install a fire alarm system to comply with BS5839: Part 6:2019: Grade D1 LD1. This has been covered in a previous answer.

34. Do you have any recommendations for manufacturers of the paint and paper for fire doors, please?

There are several providers, and if you search 'intumescent paint for doors' on the internet, you'll find a list of providers. Contact a few to see what they offer - do they give helpful advice and support your specific requirements?

35. We enter the house through a conservatory and then into the kitchen through a fire door. Does the conservatory require a smoke alarm?

This depends on whether there is a fire risk within the conservatory or not. If not, you probably don't need to install a smoke alarm.

36. Can guests get out through windows in a chalet bungalow with ground-floor windows rather than doors?

Escape windows on the ground floor can only be considered acceptable if they are easily accessed and provide a clear opening of sufficient size to allow able-bodied persons to escape in the event of a fire in the access room. Mobility-impaired people should not be accommodated in rooms where the means of escape is reliant on escape windows.

Escape plans need to be appropriate for the whole range of potential guests, taking account of age, mobility and language. This means that allowing for escape through a window is unlikely to be suitable for someone with limited mobility. It is not acceptable to rely on the intervention of the fire and rescue service.

Escape windows will need specific requirements and within exceptional circumstances.

37. We are a 3-bed bungalow. I was told I needed to install fire doors for every internal door and replace all the door frames. Is this correct?

That sounds a little bit over the top. Doors only need to be notional fire doors, so if they are the original and in good condition, they may not need replacing. If they have been replaced with unsuitable doors, glass framed, for example, they will need replacing, but unless there are no suitable fire-certificated doors to fit in the existing frame, there should be no need to install a new frame. A second opinion with an on-site inspection is advised.

38. You say most fires start in the kitchen, and issues happen in sleeping areas. In a small cottage, we have no door between the kitchen and living room and a door into a bedroom. Is there a requirement to have a fire door between the kitchen and living room?

Yes, but if this is a single-storey premises, there may be mitigations, such as discussed for log cabins.

39. We have a 2-bedroom brick and flint cottage built prior to 1800. The emergency first-floor exit window has a 2.5m drop to the ground, a narrow path and a flower bed. Would the panel advise the provision of some form of escape ladder?

This fire safety consultant would not recommend an escape ladder. Escape from the first floor via a window is not accepted guidance.

'The use of escape windows for rooms on the first floor is not considered a safe means of escape for paying guests, as they are likely to be unfamiliar with the layout of the property. If your property has inner rooms on the first floor, used by paying guests, and you cannot reasonably change the use of these rooms, you should seek further advice and guidance from a competent fire safety professional to consider a range of additional fire safety measures that might provide an alternative way of keeping people safe.'

Mitigation is covered in previous answers.

40. Is a door at the bottom of the stairs an issue (small 2-bed cottage) where the door at the bottom of the stairs leads to the hallway but can clash with the exit door?

This is not ideal, but it is preferable to not having a door protecting the escape route. The issue of a person leaving the ground floor to the hallway at the same time someone is coming down the stairs to go out the exit door needs to be carefully managed but in a small cottage with minimal footfall, it is not insurmountable. It may be suggested to have a (fire-rated) vision panel installed into the door to prevent clashes between the two doors, but this is not a simple process in an existing door. However, if the door was ever replaced, a door with a fire-rated vision panel could be installed.

41. Please clarify the smoke detector requirement. I have two bedrooms, ground floor flat with front exit via hallway, rear exit through lounge. I have battery-sealed, interconnected detectors in the lounge, hallway, and bedrooms, and heat detectors in the kitchen.

They should be upgraded to mains-connected devices – the guide says *‘All smoke and heat alarms should be mains powered with a tamper-proof standby power supply consisting of a battery. These are technically known as Grade D1 alarms.’*

The advice in the guide on battery-operated devices is *‘long-life, sealed battery alarms (known as Grade F1 alarms) may be acceptable as a short-term measure (say, around 2-3 years).’*

42. My property has two floors 3 bedrooms on the ground floor and an open living area on the first floor. I assume I will need to install smoke alarms in all bedrooms leading to a central hall. There is an open staircase from the hall to the 1st floor.

Yes – the standard has been provided in earlier answers.

43. In a small cottage with only 2 small bedrooms upstairs, accessed via stairs from the living room (distance from bottom stairs to exit is less than 4m), do you need FD30 for the bedroom doors?

Doors only need to be notional fire doors, so if they are the original and in good condition, they may not need replacing. If they have been replaced with unsuitable doors, glass framed, for example, then they will need replacing, but unless there are no suitable fire-certificated doors to fit in the existing frame, there should be no need to install a new frame.

44. Even though my property is 3-storey, I am assuming it's small (83 sq m). Do I still need to get a risk assessment done by a professional, as we are over 2 stories?

Not necessarily. The requirements for a simple 3-storey FHL are similar to a 2-storey. See [page 90 of the guidance](#).

For small premises, my advice would be that the fire alarm system should comply with BS5839: Part 6:2019: Grade D1 LD1 instead of the L2 system quoted. Any decisions you make regarding fire safety provisions must be recorded in your FRA, and deviations must be justified.

45. Our properties are all lakeside, hence the fear around thumb-turn locks. I'll wait to see the FAQ, but that's why the owners of my rentals and I are so worried about small kids and increasing their ability to leave the premises easily. A few years ago, a young child was airlifted to hospital, having been found in a lake.

The guide says that *'Exit doors, such as the front or back door, should always be easy to unlock and must not need a key to unlock them from the inside. A simple latch or thumb-turn is usually good enough. However, you may need to consider whether all guests are able to open these doors. A simple single action turn handle or lever will often be more appropriate.'*

The primary reason for this is to avoid guests, particularly vulnerable and elderly guests, struggling to exit in the event of an emergency. Smoke travels really fast. In the event of an accident and injuries occurring in a holiday let that did not have keyless exits, it would be difficult for the owners to justify. It will perhaps affect insurance coverage and be liable to prosecution as well as compensating guests.

Where there are concerns about unauthorised exits – [alarms can be fitted](#). The terms and conditions in rental agreements should also cover supervision, for example: *'There must be at least one capable and responsible adult over the age of 18 in every cottage. You are responsible for the full active physical supervision of all members or your party under the age of 18 at all times. This is particularly important around the suggested examples – swimming pool, in the games room, in the surrounding fields which have streams and fences as well as livestock.'*

The risk of children undoing the thumb-turn may also be mitigated by putting it at a sensible height.

46. I find it hard to see where my holiday let that sleeps 10 and has two staircases falls into. It's an old piggery and like a bungalow with four steps going up to one floor then three steps to the next floor. Where does this fall into?

This will fall into the '[small paying guest guide](#)' for the fire safety measures, but if the layout of your premises is not covered, it is advised to check out the examples covered from page 88 of the '[large sleeping accommodation guide](#)'.

47. We have a separate pool building with various-sized barns on site. The pool has patio doors, which are kept locked to retain heat. The keys are in a broken glass box - does this continue to be OK, or do we need thumb-turns?

No – all exits (used by members of the public or staff) need to have suitable open mechanisms. Consider [fitting an alarm](#) to prevent unauthorised use.

48. I have an apartment in a Georgian Building with fire precautions (fire doors for the main stairwell, escape plan, fire system, etc.). Do I need an additional assessment for my apartment?

Yes – each FHL apartment is required to have an FRA. This topic has been covered in a previous answer.

49. I had a professional FRA done about 10 years ago - we have open-plan kitchen dining living areas in 2 of our 3 cottages - can I revisit the original assessment, or do I need to get new assessments done?

Because of the recent changes to the legislation and the time since the last FRA, it is strongly advised that new FRAs be completed. For example, the fire alarm system standard has been increased to include smoke detection in all bedrooms.

50. Our four-bedroom 3 reception room house was virtually completely rebuilt entirely in 2009/10 to current building regulations. We have an interlinked mains smoke alarm system with battery backup with five sensors. These are located within 3 metres of the entrance to every bedroom and reception room. There are four exit doors and two staircases. The new guidance specifies that we need interlinked smoke alarms in every bedroom, reception room, kitchen and hallway. Is this required?

Yes, the standards applied to your property were (most probably) for a private domestic building. As such, the local Fire and Rescue Service were (unlikely) to have been consulted. As a holiday let, your premises come under the Regulatory Reform (Fire Safety) Order 2005 (Amended) (FSO). Premises undergoing Building Regulation works, which come under the FSO, are subject to consultation between the Building Control Body and the local Fire and Rescue Service. If this consultation had occurred, the Fire and Rescue Service would have commented on compliance with the FSO and outlined the standards that would have been required for the occupation. This would have included standards for fire alarms, fire doors, means of escape and exits.

51. We have 6 cottages, 6 wooden glamping lodges, a bar and a pizza kitchen. Do we need to follow separate guidance for each of these?

Yes, as one guidance might not cover all the services provided by the premises.