FIRE SAFETY INFORMATION GUIDE FOR LANDLORDS

INTRODUCTION

Landlords are responsible for the fire safety of their tenants. Whilst this is a clear enough statement, the considerations and precautions to be taken are challenging. The range of rental properties spanning from single household occupancy to large HMOs or combined residential/commercial properties is wide, especially when considering the multitude of occupier profiles (families, disabled or elderly people, drug abuser etc). And equally varied are the steps landlords must take to find a suitable degree of protection for their properties and tenants.

This article describes some of the fire safety considerations for the more common properties and is based on 'normal risk' and able-bodied occupants. Higher risk properties or occupants will require different solutions. The content of this document is intended as a rough guide only and applies only to England, although many parts will apply to Wales as well.

For existing residential premises, the Housing Act 2004 applies: This Act includes Housing Health and Safety Rating System (HHSRS), licencing for HMOs, management regulations for HMOs.

With regards to fire safety, the main legislation is the Regulatory Reform (Fire Safety) Order 2005 (FSO). This Order requires landlords to carry out fire risk assessments in the communal areas of HMOs, flats, maisonettes and sheltered accommodation. A guide is available to help landlords carry out fire risk assessments (Sleeping Accommodation Guide).

The responsibilities have been combined and clarified in the LACoRS Guide 'Guidance on fire safety provisions for certain types of existing housing' which applies to owner-occupied, social housing or private rented sector (single household properties, shared houses, bedsit HMOs, purpose-built flats not in compliance with Building Regulations 1991, sheltered accommodation without care, small hostels).

The LACoRS guide is not relevant to properties constructed in accordance to Building Regulations 1991 (unless changed), guest houses, bed and breakfast, hotels, motels, large hostels, family accommodation centres, student halls of residence, holiday chalets and others, for which the Fire Risk Assessment guide applies.

What is a fire risk assessment? An organised and methodical look at the premises, the activities carried on there and the likelihood that a fire could start and cause harm to those in and around the premises. Most premises covered will be relatively small and little fire safety expertise is required to carry out the fire risk assessment. The solutions suggested in the fire risk assessment guide or in the LACoRS guide are not prescriptive and several solutions to fire safety problems are usually possible.

It is recommended that a fire safety log book is kept and all routine maintenance and servicing activity is recorded in it.

The following chapters are recommendations largely based on the LACoRS guide. These recommendations cannot be blindly applied to properties but require a fire risk assessment to be carried out as well which will determine higher risk areas or higher risk occupants. A fire risk assessment might even identify a lower than normal risk.

Who is responsible for fire risk assessments and the resolution of any problems identified by the assessment? The person who has control of the premises (landlord or managing agent). That person must either carry out the fire risk assessment, pass it on to a suitable employee or must contract out the assessment. Failure to carry out an adequate fire risk assessment or failing to act on its recommendations can result in prison sentences for the fire risk assessor and the responsible person!

ASSESSMENT PROCESS
Identify Fire Hazards
Identify People At Risk
Evaluate, Remove Or Reduce Risk And Protect Against Remaining Risk
Record, Plan And Inform Or Train
Review

EARLY WARNING FIRE DETECTION GUIDLINES

Fire detection is crucial to alert occupiers to the presence of a fire and enables them to evacuate to a place of safety. A fire detection system should be able to wake sleeping people and alert of fires in hidden areas such as boiler rooms. The type of system should be in accordance with BS5839 part 6. Grade A and Grade D are the most commonly used grades within the standard.

FIRE DETECTION GRADING SYSTEMS	
GRADE A	GRADE D
Fire alarm system with detectors and a central control panel. Usually with call-points (break glass units) near exits and on each landing	System of (usually interlinked) mains-powered smoke or heat alarms with backup batteries. The interlink can be achieved with cable or radio-interlink. In low risk properties, the mains power supply for smoke alarms might be replaced with a requirement for ten-year sealed battery supply (usually combined with radio-interlink).

The coverage within the building by the detection system is described with the following codes:		
LD1	LD2	LD3
Covers all circulation spaces that form part of escape routes plus all rooms in which a fire could start	Covers all circulation spaces that form part of escape routes plus all rooms and areas that present a high fire risk	Covers circulation spaces that form part of the escape routes
There is a degree of flexibility depending on the risk determined in the fire risk assessment		

FIRE DETECTION SYSTEMS - INSTALLATION RECOMMENDATIONS

Please note that these recommendations are only applicable for 'normal' risks. Higher risk occupancy or buildings must be identified by a fire risk assessment and will result in a higher standard of protection required.

BEDSIT HMO UP TO TWO STOREYS WITH COOKING:	BEDSIT HMO WITH THREE TO SIX STOREYS WITH COOKING:	TWO STOREY HOUSE CONVERTED TO SELF-CONTAINED FLATS (PRIOR TO 1991 BUILDING REGULATIONS)
Mixed system: Grade D (LD2) in communal areas and heat detectors in bedsits (interlinked). Plus, Grade D in the bedsit itself (non-interlinked) to protect the sleeping occupant.	Mixed system: Grade A (LD2) in communal areas and heat detectors in bedsits (interlinked). Plus, Grade D in the bedsit itself (non-interlinked) to protect the sleeping occupant.	Mixed system: Grade D (LD2) in communal areas and heat detector in each flat (room/lobby opening onto escape route (interlinked) Plus Grade D (LD3) in each flat (non-interlinked) to protect the sleeping occupant.

THREE TO SIX STOREY HOUSE CONVERTED TO SELF-CONTAINED FLATS (PRIOR TO 1991 BUILDING REGULATIONS)	SINGLE HOUSEHOLD UP TO FOUR STOREYS:	SINGLE HOUSEHOLD FIVE OR SIX STOREYS:
Mixed system: Grade A (LD2) in the common areas and a heat detector in each flat (room/lobby opening onto escape route (interlinked) Plus Grade D (LD3) in each flat (non-interlinked) to protect the sleeping occupant.	Grade D, LD3 and cellar	Grade A, LD3 and cellar

COMPARTMENTATION AND FIRE DOORS

Compartmentation serves to stop or slow the spread of fire and to allow safe evacuation of a building. Fire escape routes are usually compartmentalised and there can be compartmentation between the different storeys of a building, between cellars/living accommodations and between risk areas and living accommodation etc.

Compartmentation can for example be achieved by specifying minimum standards of plasterboard thickness, as far as walls and ceilings are concerned and by specifying fire resisting doors (fire doors). The two main levels of compartmentation are 30 and 60-minute protection.

There is usually no requirement for formal compartmentation in single household occupancy and low risk shared houses, as long as the construction is sound throughout the route of escape and the doors are close-fitting and sound. Normal glazed doors, flimsy construction and hollow infill-type doors should not be accepted.

Larger properties, however, will require 30 minutes fire protection including fire doors. Their escape routes must be designed to remain free from smoke and fire for a time adequate to allow occupiers of the building to pass safely along it to a place of safety. Usually 30-minute fire doors and sound construction are required unless higher risks are present, in which case 60-minute doors and solid wall separations from risk areas are required. 30 minutes fire resistance in walls can be achieved with solid walls or 12.5mm plasterboard and skim coat. ceilings must ideally be protected with 12.5mm plasterboard and any ducts must be fire stopped with preferably 60 minutes resistance. See LACORS guide for details.

Floor/ceiling partitions between any basement or cellar and the ground floor escape route should usually provide 60 minutes resistance.

Where residential premises are above commercial premises there is usually a requirement for a 60-minute separation between premises and for an interlinked fire detection system in both premises.

Protected escape routes must have no portable heaters or portable heating sources, no cooking facilities, no furniture or storage.

Fire doors help to partition the building into zones. In areas where fire resisting partitions are required, any doorway must be fitted with fire doors. 30-minute partitions require 30-minute fire resisting doors (FD30), 60-minute partitions require 60-minute fire resisting doors (FD60). The letter ‘S’ after the FD30 or FD60 denotes smoke (cold smoke) seals to be fitted. Most fire doors require intumescent AND smoke seals to be fitted. The exception are fire doors in buildings with smoke detectors only on escape routes, in which case smoke seals should not be fitted so as not to restrict the flow of smoke towards the smoke detectors. It is common to combine intumescent and cold smoke seals into one seal.

Fire doors should mostly be fitted with door closers

Fire door signs are only required on fire doors across escape routes and doors to communal kitchens and other communal rooms. They should be marked ‘Fire door keep shut’

Purpose built blocks of flats usually have at least 60-minute fire resistance between the flat and the means of escape, converted flats can be 30-minute fire resistance or even less. HMOs fall into the second category.

EMERGENCY LIGHTING

When a fire occurs, people escape in haste and distress. They might be disoriented, especially at night. Staircases and escape routes must therefore be adequately lit, even if the mains power supply is failing as a result of a fire.

Emergency lighting, which will illuminate the escape route after a mains power failure, is therefore required for buildings larger than two storeys. Smaller buildings and single households do not require emergency lighting if the escape route is short and 'borrowed' lighting is shining into the building from the outside.

GENERAL RECOMMENDATIONS	
SINGLE HOUSEHOLD OCCUPANCY UP TO SIX STOREYS	SHARED HOUSE HMO UP TO FOUR STOREYS
Emergency lighting may be required if route is complex and there is no effective borrowed light.	Emergency lighting may be appropriate if route is complex and there is no effective borrowed light.

SHARED HOUSE HMO FIVE OR SIX STOREYS	BEDSIT HMO UP TO FOUR STOREYS (INDIVIDUAL COOKING)
Emergency escape lighting required	Emergency escape lighting may be required if building is complex and no effective borrowed lighting available

BEDSIT HMO FIVE OR SIX STOREYS (INDIVIDUAL COOKING)	HOUSES CONVERTED TO SELF-CONTAINED FLATS (UP TO FOUR STOREYS) PRIOR TO 1991 BUILDING REGULATIONS
Emergency escape lighting required	Emergency escape lighting if risk requires

HOUSES CONVERTED TO SELF-CONTAINED FLATS (FIVE OR SIX STOREYS) PRIOR TO 1991 BUILDING REGULATIONS:	FLAT IN MULTIPLE OCCUPATION (FMO):
Emergency escape lighting required	Emergency escape lighting if risk requires, may also be required in the common escape route

Emergency escape lighting systems must comply with BS 5266. Emergency lights are required at stairs and changes in floor level or direction and to identify fire alarm points and fire suppresion equipment. In most cases non-maintained emergency lights providing three-hour light will be adequate. The system must incorporate a suitable means for simulating and mains failure (i.e. a test switch).

FIRE SUPPRESION

The provision of fire blankets and simple fire extinguishers can be useful in restricting the development and spread of small fires in their initial early stages. However, unless a fire is very small, the best advice is to **evacuate the building to a place of safety** and call the fire and rescue service.

In HMOs and buildings containing flats, simple multi-purpose extinguishers are required on each floor in the common parts. It will not usually be practical to train tenants in the use of these, but basic advice should be offered at the start of each new tenancy. Whilst powder extinguishers are excellent multi-purpose extinguishers, an inadvertent discharge or deliberate abuse of powder extinguishers can cause substantial damage. Powder extinguishers also reduce visibility and, for this reason, are no longer recommended by the British Standard for indoors use. Landlords therefore need to consider carefully whether foam or even water extinguishers are a suitable alternative. Water mist fire extinguishers, for example, are an excellent alternative, as they can be applied on most fire types, including fat fire and electric fires and cause almost no damage to the interior.

Fire extinguishers should be maintained annually to BS 5306-3. This needs to be done by fire extinguisher service engineers unless service-free extinguishers are deployed. In this case the landlords or their representatives carry out a visual inspection following the guidance of the manufacturer.

FIRE SAFETY SIGNS

In most residential premises of average size and normal risk, fire safety signs and notices will not be required. However, larger (more than three storeys) and complicated premises are likely to require signage.

TO DECIDE IF SIGANGE IS REQUIRED, CONSIDER THE FOLLOWING QUESTIONS:
Are occupier's familiar with the escape route?
Is one escape route shorter than others?
Are there changes in direction?
Are there any areas where confusion may occur when exiting a building?
Are there external secondary escape routes which should preferably be used?
Is there any firefighting equipment that requires signage?
In general; Fire exit signs with directional arrows should provide clear and unambiguous information about the escape route and the fire exit.