



Fire Doors in Residential buildings (over 11 metres in height)

This is an abridged version of Fire Safety (England) Regulations 2022, fire door guidance published on the 19th January 2023 by H M Government, for the full version of these documents please go to the H M Government web site or RES web site www.extinguishers.co.uk and look on our Fire door services and or Free downloads pages.

For a fire door inspection and maintenance service quotation, please call 0800 731 0727 or email sales@extinguishers.co.uk

What has changed?

The Fire Safety (England) Regulations 2022 were placed on the statute book on 18 May 2022, and it came into force on 23 January 2023.

For “Fire Doors” this is “Regulation 10”

What the law requires

The Regulatory Reform (Fire Safety) Order 2005 (as amended) (‘the FSO’) requires that, in a block of flats, there are suitable fire precautions in place to make sure that the common parts are safe to use as a means of escape in the event of fire. The appropriate fire precautions are determined by carrying out a fire risk assessment.

The Fire Risk Assessment

Your fire risk assessment should already have identified the doors in question and determined whether the doors are adequate to resist the spread of fire and smoke into, or within, the common parts.

This is about making sure that the fire doors remain suitable thereafter and match those that were taken into account in the fire risk assessment.

NB: *“The government is committed to ensuring that undue burdens are not created for freeholders and, through service charges, for leaseholders. Accordingly, for the purpose of the fire door checks required by the Fire Safety (England) Regulations, it can be assumed that the Responsible Person has evidence that the design, specification and installation of the door is adequate for its location or is taking separate measures to deal with any inadequacies in inherent fire performance; identification of issues in relation to the type of door and its intended resistance to fire and smoke is a matter for your fire risk assessment.”*

(Important note from Regulation 10)

The checks required under the regulation do not replace the existing duty under the Fire Safety Order for the responsible person to put in place general fire precautions and their

duties under Article 17 of the Fire Safety Order in all buildings which are in scope of the Fire Safety Order, regardless of height.

Who is responsible?

The “Responsible Person” this could be the building owners, for example the freeholder, and any other persons having control of the premises, the managing agents for example. Any breach of the regulations is a criminal offence if the breach places one or more relevant persons (for example residents, staff or visitors) at risk of death or serious injury in the event of fire.

What is classed as a residential building?

To all blocks of flats or parts of such blocks/buildings, that contain two or more domestic premises and that contain common parts, through which residents would need to evacuate in a fire. Regardless of whether the block is purpose-built or is a conversion.

Height of the building covered by “Regulation 10”

Blocks of flats in which the top storey is more than 11m above ground level, typically, a building of more than four storeys.

What does “Regulation 10” require?

1. Routine checks to be undertaken on fire doors, that the Responsible Person must ensure are carried out.
2. Provide information about flat entrance doors that the Responsible Person must give to all residents, whether tenants or leaseholders.

What fire doors are included?

- flat entrance doors
- doors to stairways and lobbies (between corridors and stairways)
- doors that sub-divide corridors
- doors to plant rooms, cupboards and to service risers shafts

What fire doors are not included?

- The landing doors of lifts

What is the aim of Regulation 10?

As with all fire safety measures, fire doors need to be kept in good working order and in good repair. Wear and tear, for example, can result in defects. The objective of regulation 10 is to ensure that such defects do not materially undermine the ability of the doors adequately to prevent fire and smoke spread, whether to the extent originally designed or as verified as adequate in the most recent fire risk assessment.

What are “routine checks” on the fire doors?

1. Carry out checks of any fire doors in communal areas at least every 3 months.
2. Use best endeavours to check all flat entrance fire doors at least every 12 months.

Item 6.3 of Regulation 10

The checks under regulation 10 should be simple and basic. You should not need to engage a specialist to carry these out. With appropriate instruction, caretakers, managing agents, housing officers and maintenance personnel should be able to do the, for

example in the course of other routine checks and visits to the building, as the checks are only visual and do not involve, for example, use of tools.

(Please see the HM Government check list in Appendix A)

(Please see “what to check for” in Appendix B, this is item 6.7 of Regulation 10)

Item 6.4 of Regulation 10

Issues identified. *The extent to which the individual appointed to carry out the checks will also be able to address the issues or complete any repairs will be determined by their skills, knowledge and experience of fire doors. Where inspections identify the need for repair or replacement of any fire door, for example communal or flat entrance door, this work must be undertaken by a competent contractor as soon as reasonably practicable.*

Item 6.8 of Regulation 10

*While the Fire Safety (England) Regulations require that they are checked every three months, **it is a simple matter** for them to be monitored on an ongoing basis when any other checks in the common parts are carried out or the building is visited.*

The difference between communal fire doors etc and flat entrance doors

As flat entrance doors will need to be checked on both faces/sides, access to flats will be required. Ultimately, you might need to consider legal action if a resident persistently refuses to cooperate with these checks.

In any cases when access to a flat was not granted, the responsible person should gather evidence of the steps they have taken to discharge this duty. This could include correspondence between the responsible person and resident seeking permission to gain access.

Changing flat front doors

Where a resident wants to alter or change their front door, this should be done with the knowledge and agreement of the Responsible Person to ensure that it does not negatively impact upon the overarching fire risk assessment for the premises.

What does “best endeavours” mean? (From Regulation 10)

It will be for responsible persons to determine the best approach to engage with residents in order to get access to undertake the annual checks of flat entrance doors. This could include the responsible person agreeing with residents a date, so access can be granted.

Why does information need to be provided to residents?

Residents have an important role to play in ensuring that, if there is a fire in their flat, the flat entrance door is an effective barrier to the spread of fire and smoke into the common parts.

What information needs to be provided to residents?

Fire doors should be kept shut when not in use;

Residents or their guests should not tamper with self-closing devices;

Residents should report any fault or damage immediately to the Responsible Person.

When does the information need to be provided?

1. The above information must be provided by the Responsible Person to any new resident as soon as reasonably practicable after the resident moves into their flat.
2. The Responsible Person must also remind all residents about this information at periods not exceeding 12 months starting from when the regulations come into force.

Checks of fire doors in residential buildings below 11 metres

The regulations do not replace the existing duty for a responsible person to put in place general fire precautions in any premises covered by the Fire Safety Order, regardless of the building's height.

The Fire Safety Act 2021 has clarified that in any residential building which contains two or more sets of domestic premises are within the scope of the Fire Safety Order.

Responsible persons for residential buildings below 11 metres in height have a duty to put in place general fire precautions in these buildings, this duty includes making sure that all fire doors – including flat entrance doors – are capable of providing adequate protection.

Responsible persons will also be required to provide residents in all residential buildings with two or more sets of domestic premises with information on fire doors.

Fire doors checks are vital in making sure your block of flats is safe for residents. The checks are not a substitute for periodic assessment of fire doors by fire safety specialists (for example on a sampling basis during fire risk assessments). BS 9999 also requires that fire doors are inspected on a 6 monthly basis.

However, the simple fire door checks described in this guide will enable you to discover, and put right, most of the rudimentary defects that prevent a fire door from doing its job.

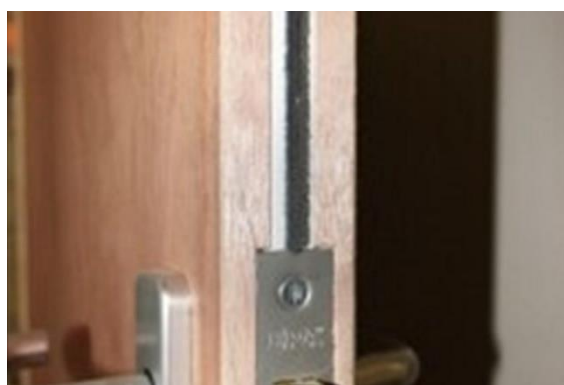
What to check on fire doors

Flat entrance doors (Annual check)

1. The resident has **not replaced** a fire-resisting flat entrance door with a new, non-fire-resisting door; this may be obvious if the door is of a different design from all other doors in the building but may not be where flat entrance doors are all of a different design. Where any doubt exists, the resident will need to confirm that the new door is fire-resisting, has been installed by a competent person, and they will be required to provide the technical information relating to the door to the Responsible Person. Modern fire doors should display a visible fire resistance rating.



Fire door resistance rating signage



Combined intumescent strip/seal

2. **Intumescent strips**, which expand when exposed to fire and seal gaps around the door and smoke seals, which look similar to draught seals, if present, are undamaged, make contact with the door edge or frame, and have not been painted over during decoration activities. (If they were not originally present, this may be acceptable, subject to the findings of the fire risk assessment.) These strips and seals may be fitted to either the door or the frame they are normally combined, as shown in the photograph above.

3. There is **no damage** to, or defects in, the door, frame or the securing wall that might affect the ability to resist the spread of fire or smoke (for example a split in the wood of a timber fire door, damage to any glazing in the door, warping of the door that affects its fit in its frame, a hole where a lock has been removed). Doors should also be checked for any alterations that may affect their fire resisting qualities.

4. The condition of the **fire-resisting glass** and glazing system in the door panels, and any associated side or over panels forming part of the doorset, retains their ability to resist the spread of fire and smoke.

5. There are no obvious defects in the **hinges**, for example missing or loose screws, or any other element of the ironmongery, for example ventilation grilles.

6. **Letterboxes** are firmly closed and not jammed open. Where a letterbox has been fitted to a door that did not previously have one, the resident will need to confirm that the new letterbox is suitable for use in fire-resisting doors and has been fitted by a specialist contractor.

7. The **gap between the door and the frame** is not too large. The industry standard is that the gap size should never be more than 4mm, except at the bottom of the door, where the gap should be as small as practicable, while ensuring that the door is unlikely to snag on the floor even if the door drops slightly on the hinges. Simple “gap tester” cards are available for this purpose.

8. There is an effective **self-closing device** on fire doors of flat entrances and fire doors within common parts. This is very important. A fire door that does not close fully into its frame will not adequately hold back fire and smoke. You should check that the door will close fully into its frame when opened to any angle and allowed to close under the action of the self-closing device. A simple way to check this is to:

- firstly, open the door fully, then let it go
- then open the door to around 15 degrees and let it go

In both cases, the door should fully close into the frame, overcoming the resistance of any latch or friction with the floor.



Overhead door self closer



Concealed door self closer

Flat entrance doors do not need to have “fire door keep shut” signage displayed on them

Communal doors, stairways, lobbies and doors within corridors (3 monthly)

These doors are subject to greater wear and tear, and to greater potential for damage, than flat entrance doors, so they must be examined more regularly. While the Fire Safety (England) Regulations require that they are checked every three months, it is a simple matter for them to be monitored on an ongoing basis when any other checks in the common parts are carried out or the building is visited.

Checking these doors is similar to checking flat entrance doors, so you should check for:

- damage or defects that might affect the door’s ability to resist the spread of fire or smoke
- any damage to intumescent strips or smoke seals, if present
- large gaps
- the presence of an effective self-closing device

In some premises, corridor and lobby doors might be held open on **magnetic door hold-open devices**. For this to be the case, there would be a need for smoke detectors, activation of which would cause the door to close. Care should be taken when checking the self-closing device on these doors. Use the test button, where provided, to close the door, rather than pulling the door from its magnet.

Although unusual, where a **double door** is installed, that requires one leaf to close before the other, a door selector may be fitted to ensure that the doors swing closed in the correct order. Where such a selector is fitted, this should be checked to ensure that it is operating correctly.

These fire doors should have “fire door keep shut” signs displayed on them.



Fire door “keep shut” sign

Doors to plant rooms, service cupboards and service risers (3 monthly)

Again, the checks are similar to those described for other doors. In particular, you should check for:

- damage or defects that might affect the door’s ability to resist the spread of fire or smoke
- any damage to air transfer grilles that may be present in the door
- any damage to intumescent strips or smoke seals, if present
- large gaps

These doors may be either self-closing or kept locked shut. If the doors are self-closing, they should be checked as above, if they are locked shut does the lock work.

These fire doors should have “fire door keep shut” or “fire door keep locked” signage as appropriate displayed on them.

Caution should be exercised to ensure that entry into any of these areas can be carried out safely by those involved, taking into account any findings of the relevant health and safety risk assessment.

Appendix: fire doors checklist

Location			Checks completed									Comments – Issues identified; actions taken etc
Floor	Door	Door type	Door, frame, and securing wall	Letterbox	Glazing	Hinges, locks and other ironmongery	Door gaps	Strips and seals	Self-closer	Alterations	Any other damage	

Address

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Name

Job Title

Signature

Date