



Guidance on the Provision of Fire Doors within City of Edinburgh Council Licensed HMO Premises

This document has been produced to provide guidance on the provision of fire doors within premises occupied as a HMO within the City of Edinburgh.

The information contained within should be used in conjunction with the premises Fire Safety Risk Assessment, as well as the guidance contained in the Scottish Government document '*Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation*' when assessing the adequacy of fire doors within individual HMOs.

1. New Licence Applications

1.1 Requirement

The requirement for fire doors within HMOs is covered by the guidance contained within *Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation*, which states:

The provision of self-closing fire-resisting doors with smoke seals offers protection to a bedroom corridor escape route from fire and smoke if a fire starts in a room, maintaining the tenability of the escape route to give maximum evacuation time. Some premises will have fire doors fitted to bedrooms to comply with Building Regulations. *Chapter 6, Restricting the Spread of Fire and Smoke, Fire Separation and Compartmentation, Corridors, Section 171.*

1.2 Additional Information

The purpose of fire separation is to provide a physical fire-resisting barrier to restrict fire and smoke spread between different occupancies and between single occupancy parts and communal areas.

A fire door is rated by its fire-resistance performance under test conditions: normally 30 minutes (short duration) or 60 minutes (medium duration). – *Chapter 6, Restricting the Spread of Fire and Smoke, Doors, 174.*

In determining the performance of a door in fire, it is necessary to consider the whole door assembly including the frame, glazing, side-panels, transoms and ironmongery. In the case of a new door assembly, the manufacturer's installation instructions should be followed.

The gap between the door leaf and the frame is normally fitted with intumescent strips and smoke seals in either the door or preferably the frame. The strips expand in response to heat from a fire, to seal the gap between the door leaf and the frame. Smoke seals fitted to the door leaf gap prevent the spread of smoke at ambient temperatures, before an intumescent strip expands.

1.3 Existing Nominal Doors

Some existing doors, although not certified fire doors, may be suitable provided they are of substantial solid construction and close fitting (the British Standard states 3mm at the top and sides). The doors must not be cracked, damaged, warped or contain holes etc. These 'nominal doors' should be upgraded, where necessary, with intumescent strips and smoke seals, intumescent paint etc in order to achieve short duration (30 minutes) of fire resistance.

1.4 Existing Domestic Panel Doors

Existing domestic panel doors may have the potential to be upgraded to an acceptable fire resistance. However, doors which are constructed with thin panels or are warped, split or have substantial gaps may not be suitable for upgrading.

Any upgrade must achieve the minimum of short duration (30 minutes) fire resistance. It is the responsibility of the duty holder to provide evidence to show that the upgrade meets the required standard.

Additionally, these doors should be fitted with intumescent strips and smoke seals where necessary.

1.5 Other Door Types

Lightweight, louvre or hollow doors and doors with thin panels **will not be accepted.**

1.6 Additional Requirements

- The gap between the door leaf and the frame is normally fitted with intumescent strips and smoke seals in either the door or preferably the frame.

- A main entrance door which is accessed via a common stair should also meet this standard, including the appropriate self-closing device, smoke seals and intumescent letter plate.
- Generally, bathrooms and WCs do not require a fire door. However, if the room contains a washing machine, tumble dryer, dishwasher etc. then a fire door may be required due to the increased fire risk.
- Cupboard doors may also be required to offer the same fire resistance if located off the hallway and contain an increased fire risk (Consumer Board, Boiler or White Good). A suitable fire safety risk assessment should be carried out and the outcome used to decide upon the suitability of doors.
- As opposed to the fitting of self-closing devices, small cupboards with low risk can be locked shut when not in use.
- **Box room** doors should meet the same standard as bedroom, kitchen and lounge doors.
- In all cases of upgrade, it is the responsibility of the duty holder to provide evidence to show that the upgrade meets the required standard.

2. Existing Licensed HMOs

2.1 Acceptance

Where a door has been previously accepted (under a new licence application), it will continue to be accepted at renewal stage unless:

- There was a clear omission in the recognition of door type, or
- Damage to the door has been sustained in between renewals/original license approval.

However, in all cases, Intumescent strips and smoke seals should be fitted.

2.2 Domestic Panel Doors

Where panelled doors were previously accepted, they will continue to be accepted provided that:

- They are close fitting
- The door is in a good, solid condition
- **Panels are secure and of a material thicker than 10mm**
- No subsequent damage, shrinking etc. has taken place
- Intumescent strips and smoke seals are fitted.

If the thickness of panel is suspected to be less than 10mm or damage is evident, then upgrading of the door is necessary. A tested and proven proprietary system, which is appropriate for the door, should be selected or the door should be replaced with a certified FD30s door.

It is the duty holder's responsibility to provide evidence to show that the upgrade meets the required standard.

2.3 Other Door Types

Lightweight, louvre or hollow doors and doors with thin panels **will not be accepted**.

3. Upgrading Time scales

3.1 New Applications

Where any door is required to be replaced or upgraded in order to meet the standard as part of the license application process, then this work should be completed prior to the premises being cleared for a license.

3.2 Renewals

Where any door is deemed to require an upgrade following a renewal inspection then, provided the door is not of the lightweight, louvre or hollow door type, or damaged, warped etc, the upgrade work should be completed prior to the next renewal inspection or within one year, which ever is the sooner.

4. Additional Guidance

4.1 Scottish Government Fire Safety Guidance:

<http://www.gov.scot/Topics/Justice/publicsafety/FireRescue/FireLaw/FireLaw/SectorSpecificGuidance>

4.2 Fire Safety Risk Assessment Guidance:

<http://www.gov.scot/Topics/Justice/policies/police-fire-rescue/fire/FireLaw/GeneralGuidance/FireSafetyRiskAssessment>

4.3 Fire Safety Guidance for City of Edinburgh Council Licensed HMO Premises

http://www.edinburgh.gov.uk/downloads/file/9240/hmo_fire_safety_guidance

4.4 Associated British Standards:

BS 476, Part 22.

BS 8214:2008, Code of practice for fire door assemblies.