

A close-up photograph of a metal key with a house-shaped keychain hanging from it. The key is inserted into a door lock on a wooden door. The background is a blurred image of a person, suggesting a residential setting. The text is overlaid on the right side of the image.

FIRE SAFETY FOR YOUR BUILDING

FRONT DOORS - YOUR LEGAL DUTIES

Front Doors - Your Legal Duties Explained

This circular aims to inform you of the laws relating to flat front doors and what the new legislation means for you.

The details of this circular are important and will take 5-10 minutes to read the contents which comprise details on the current law and a Q&A of the commonly asked questions.

The Law

There are now 5 pieces of primary legislation which apply to fire safety in residential buildings, these are:

The Building Regulations 2010

Homeowners are required to comply with the regulations when undertaking any alterations to their property.

The Regulatory (Reform Fire) Safety Order 2005

Homeowners are required to co-operate with a Landlord / Building owner or their appointed agent to ensure the fire risk is reduced as far as possible.

The Housing Act 2004

Homeowners are required to reduce the risk of fire within their home – especially when the property is sub let.

The Fire Safety Act 2021

Reinforces the legal requirement for building fabric, and fire doors to comply with the Regulatory (Reform Fire) Safety Order 2005 and creates sometimes multiple responsible persons for fire safety in a residential building from building owners to homeowners.

The Building Safety Act 2022.

Introduces a new regulatory framework to improve fire safety and security in high-rise buildings.

Fire Safety (England) Regulations 2022

Refers to duties for both landlords and leaseholders, and includes flat entrance doors (FED's).

Flat entrance doors and communal fire doors - why are they so important?

Fire doors (apartment front doors and common part doors) must provide adequate protection and a barrier from smoke and fire, in the event of a fire in a residential building. Correctly working fire doors keep fire and smoke contained in a small area. This allows the building to be evacuated or a stay put policy operating effectively until fire and rescue services are able to control the situation.

How does this affect me?

Flat entrance doors and communal fire doors form a critical part of the features of the firefighting regime in a block of flats. Their maintenance saves lives in the event of a fire.

Their performance serves 2 purposes:

- To stop a fire and fire spreading outside of an apartment into the communal areas preventing an escape through the common areas.
- To stop a fire spreading through the common areas of a block of apartments or into an apartment where residents may be sheltering until the fire and rescue service arrives.

More often than not, your flat entrance door belongs to you and it is your responsibility to maintain it in keeping with the new required standards. Please check your lease for these details or speak to MLM for confirmation.

MLM will ensure that for buildings above 11m in height or are demised to your Landlord, common part doors are now inspected quarterly as per the regulation and flat entrance door are inspected at reasonable intervals for you. This is likely to be done on an annual basis and it is critical that access is provided for this purpose. Arrangements are being made for all doors to be inspected, primarily on buildings above 11m, but all buildings will be inspected in time. If you have not been contacted, you will be contacted soon to arrange an appointment to inspect the front door.

Any non-conformance against the regulations will be provided to you in a report that we will arrange via an independent specialist. You will need to have a suitably qualified person repair any non-conformances and evidence this to us as we are required to keep these detailed records on file for inspection by the Building Safety Regulator (BSR), and the Fire and rescue services if required. We would require evidence of repairs / conformance with the recommendations of the report within a reasonable time frame, but not more than 3 months, or sooner where practically possible.

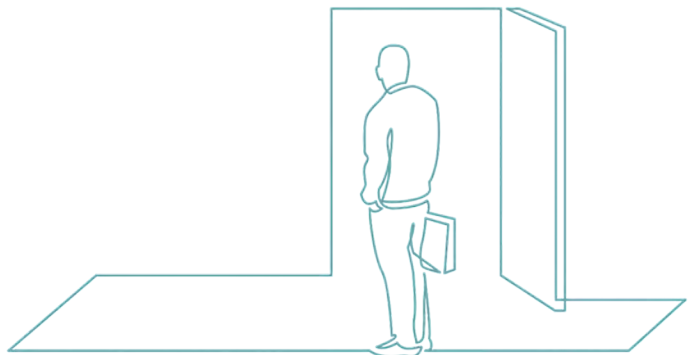
What are the standards for a front door and its' frame?

A fire door is a combination of components including door leaf, door frame, hinges, self-closer, fire and smoke seals and possibly a lock or latch all designed to provide fire resistance. It may have a glazed vision panel or other type of aperture cut-out, including a spy hole or letter box. Expert help may be required to assess a door's suitability.

All flat entrance doors, door sets, and all parts are now required to conform to a set standard under strict fire conditions. Older developments may not be able to evidence that the flat entrance door complies with these regulations. Annual testing will highlight any non-conformance and rectification or improvement works that are required for compliance under fire conditions in the event of a fire.

Flat entrance doors must comply with the following basic requirements to ensure that they hold back smoke and fire for at least 30 minutes:

- They must be a FD30s door which can be evidenced. Modern doors will have a plate located on the door to advise the door type which will set the minimum identifiable standard. Whereby, the 'S' denotes smoke protection.
- Your door must have a self-closer to ensure that it closes in the event of an escape to prevent smoke and fire from filling a common area escape route.
- Your door must have appropriate smoke and heat seals around the door and frame.
- Any furniture inside or on the door must have a suitable heat seal to prevent smoke escaping from spy holes, letter boxes, hinges, locks etc.
- Locks must be fire compliant along with fire rated hinges.
- There must be no more than 4mm gaps around doors and frames to provide a tight smoke seal and the door must close correctly around the whole frame.
- Annual inspections of doors will allow for a review of all these items and anything that is worn or not compliant can be advised to homeowners for remedial repairs to take place.



Government Guidance entitled 'Check your fire safety responsibilities under the Fire Safety (England) Regulations 2022- updated 25.10.2023 p.10/18 notes:

The Fire Safety Regulations 2022 do not specify requirements for the fire resistance of the doors. The Regulations make no change to the required fire performance of the flat entrance doors; this continues to be a matter for the fire risk assessment carried out for compliance with Article 9 of the Fire Safety order and applicable guidance.

It is stressed that the purpose of the fire door checks under Regulations 10 (4) and (6) is primarily to ensure that self-closing devices are working, and the flat entrance doors are in good working order from a fire safety point of view, while also checking that there are no visually obvious faults, signs of tampering, defects or changes to the doors provided.

What if I have an older door and can't find information on my apartment door?

If you can't find any information on your flat entrance door, the below information is a good starting point to assist. You should also take professional advice from an authorised and competent professional installer or fire engineer (Figure 1 at document rear, provides a suitable diagram of current approved door specifications).

Is your door made of solid wood?

Your door should be a solid door to allow for a minimum of 30-minute fire protection. Tap / Knock on your door, does it sound hollow? Look inside the letterbox, is your door made of solid wood?

A more modern door, will contain a coloured lug in the door advising that it conforms to the required fire Integrity. There are also likely to be a plate with markings advising the door type and security / fire rating. These can sometimes be located on the top of the door leaf.

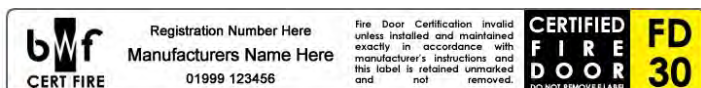


Not sure about your front door? Speak to a suitably qualified professional.

What do the fire door labels look like?

Look for an identifying sticker on the door or frame giving the door a unique identifying number to advise that it has been inspected by a qualified TRADA's Q mark scheme or BWF's Certifire scheme.

Illustrative examples of common colour coded door lugs and fire door markings:



Fire Resistant Ratings	Intumescent Necessary	Intumescent Not Necessary Green Core
30/20 (White background)		
30/30 (Yellow background)		
60/60 (Blue background)		



Measure the width of the door (the thin edge).

Fire doors must be a minimum of 44mm in thickness. Many doors can have panelled sections and the thickness of these panels can fall below 44mm effecting the fire integrity of the door. It is unlikely in these circumstances that your door will meet the necessary fire resistance under the regulations.

What hinges hold up your door?

Metal hinges on a wooden door hold up differently under the heat of a fire. Therefore, there is a requirement to have 3 hinges which display the necessary CE marks to show that they conform to the requirements. All holes in the hinges also need to have the correct screws applied correctly with no edges showing. The London Fire Brigade (LFB) recommend that "all fire doors have at least 3 hinges with a melting point of above 800 degrees centigrade. <https://www.london-fire.gov.uk/safety/property-management/fire-doors/>

Is there a beading strip inside the door frame?

Is there a door stop fitted around the door frame measuring at least 25mm which the door closes into? This is also a requirement for the door and frame set to be compliant.

Is there a smoke and or heat seal either inside the frame or fitted to the door?

Doors and or frames are required to have a smoke and or heat seals around them. This should be unbroken, undamaged and never painted over as this will allow the spread of fire and smoke.

Is there a self-closer either inside the door or overhead door closer?

Properly functioning fire doors are required to have a self-closer fitted. This will allow the flat entrance door to shut into the frame if you let it go. This is essential to stop fire and smoke spread into the common areas in the event of a fire inside an apartment. All doors with a self-closing devices and should close in less than 25 seconds from 120 degrees, as recommended in BS 1154.

I have a UPVC door, will this be covered under the regulations?

Currently, UPVC doors are unlikely to be accepted as a compliant fire door. Normally UPVC covered and/or UPVC coated doors have no markings on the door to indicate that it is a fire door. However, when the door was purchased and/or installer documentation should have been provided by the contractor/merchant and this would have stated if the door was a fire rated door. Having the relevant British Standards (BS) numbers BS 476 part 22 or BS8214 will assist to make a formal identification of the fire safety of these types of doors.

Can I upgrade my front door or do I need to replace it with a door and frame?

This will depend on the construction of the door and frame and whether it will meet the 30-minute resistance test. Especially in older buildings where no markings can identify the design of the door, **professional advice is recommended in all cases.**

If I replace my front door what standard does this new door need to be?

- **Door Type:** All new fire door sets to apartments must be able to be certified as (at minimum) FD30s standard in accordance with BS476: Part 2 1987 or BS EN 1634-1 2000. Ideally, these should also meet "Security by Design" standards.
- **Certificate Required:** A test certificate for all replacement doors to confirm this standard and installation by a qualified engineer must be provided to MLM to maintain records for the building, as now prescribed by law.
- **License:** You always require a license to change your door and you should **ALWAYS** contact MLM before you change your front door.
- **Door Design:** Installation of new front door sets may also require a specified door type, design and colour to ensure that a uniform look is maintained in the building. Please check before you embark on any front door project yourself.
- **Poor Installation:** Installing a new fire door correctly is essential. A poorly installed door will not perform as designed in the unlikely event of a fire, causing more damage to the building.
- **Accredited Installer:** Homeowners are strongly advised to only use the services of a competent professional with a suitably relevant accredited fire door installation company. Do not be tempted to allow the average builder to install your door. They are unlikely to be qualified to provide the relevant paperwork for compliance purposes. Please use an accredited schemes ensuring qualified installers use relevant and compliant parts for installation and certification.

These are listed below:

BM Trada Q Mark: OP37 Fire Door installation scheme

<http://www.bmtrada.co.uk>

FIRAS : Installer certification scheme

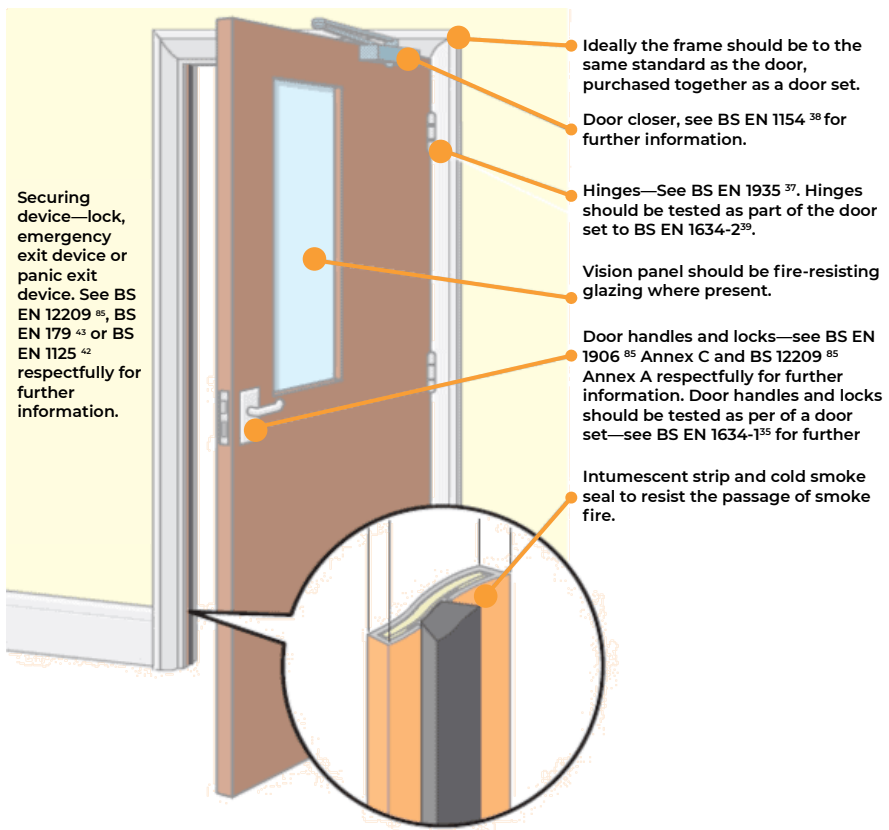
<https://www.warringtonfire.com/certification-services/fire-certification/firas>

The above represents the main points to consider to achieve compliance with the regulations. This is not an exhaustive list. If you are unsure, we recommend that you take independent advice from a specialist and qualified contractor.

Please also note that MLM will attempt to undertake a survey of your door at least annually to assist in compliance with the regulations, but such compliance remains your responsibility.

Generally, if your door is **not** of solid wood or the correct thickness or fitted with the correct glazing, it is **unlikely** that any upgrading will make it comply with the new regulations. In some limited cases, the door itself can be upgraded and additional improvements can make it compliant. A professional assessment by a qualified professional will confirm these points.

Current compliant fire door specification requirements





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Michael Laurie Magar Ltd.

T: 020 8492 9850

W: www.mlmproperty.co.uk