

FIRE SAFETY IN SHORT TERM LETS

Wednesday, 19th October 2022

Your Questions Answered

Q:	Do I have to pay someone to carry out my fire risk assessment?
A:	Whoever carries out the FRA should be competent. Therefore, owners can carry out the FRA if they understand the process of fire risk assessment and understand the principles of fire safety.
Q:	My open plan property falls out with the scope of the guidance produced by Scottish Government. Is it suitable for short term lets in terms of fire safety?
A:	Premises that fall out with the scope of annex 2 present an increased risk to life in the event of emergency. This does not mean that these premises are automatically unsuitable. Contact your local fire safety office to discuss your particular issues.
Q:	How can I tell what type of doors I have and how can I tell if they are suitable?
A:	Traditional tenement type doors should be easy to spot and as long as they are in good condition may give a suitable level of nominal fire resistance. Where doubt exists obtain the services of a professional.
Q:	Do I need to have detectors in the bedrooms of my 4 bedroom property as my existing detection is within 3m of each bedroom door?
A:	There is a disconnect between the guidance provided by the Scottish Government and that given in BS5839-6. The British Standard states that all bedrooms should be provided with detection whereas the Government guidance states that detection is required in bedrooms once they number over 4. Either way in this example detection is required in bedrooms. As discussed during the presentation SFRS recommend that bedrooms should be covered regardless of the number.
Q:	I have a 4 bedroom, 2 storey, cottage so, as far as the 'standard' guidance is concerned, it should have a separate fire alarm installed in each bedroom. It has linked smoke alarms throughout the property, however, it doesn't have one in each bedroom. It has 2 staircases each of which serves 2 bedrooms and there is a fire alarm at the top of each stair which is well within the required 3m of the doorway to each bedroom. Do I really have to install an extra 4 fire alarms in the property or is it sufficient to be confident that the fire alarms are close enough to the bedroom doors to be effective in waking any occupants?
A:	Detection in the bedrooms is required.

Q:	In 2 cottages I am involved with, the staircase rises directly from the living room which incorporates a wood burning stove. The living rooms are equipped with smoke and CO alarms. Exit to the outside is via a door from the living room to a lobby and then the front door. It is not practical to divide the stairs off from the living room – how should this situation be addressed in a fire risk assessment?
A:	Your fire risk assessor will take into account the risk presented by this layout and will determine whether additional compensatory features are required to reduce the risk to a tolerable level. If doubt remains raise this with your local fire safety officers.
Q:	What if the property doesn't have an outside fire escape from the bedrooms upstairs? Is providing fire extinguishers upstairs & downstairs and having a clear staircase to the outside escape door sufficient?
A:	Each individual premises should be taken holistically which may result in different outcomes specific to each premises. Discuss this with your fire risk assessor and also with local SFRS officers to ascertain the robustness of your fire safety provision.
Q:	How do you risk asses/what to do if the living accommodation of the house is all open plan on the ground floor and all bedrooms on the first floor? Ie no doors between the stairs and fire exits apart from to each individual bedroom
A:	Each individual premises should be taken holistically which may result in different outcomes specific to each premises. Discuss this with your fire risk assessor and also with local SFRS officers to ascertain the robustness of your fire safety provision.
Q:	In the Highland Council area we have a fire safety check list to complete. Much of it is regarding emergency lighting, fire detection systems, glass break alarms and fire escape signage. I let two bedrooms in home on a b& b basic for 6 months of the year - do I have to install all of this in my home?
A:	Each premises will have a specific fire safety provision to address the risks presented. It is unlikely that a commercial detection system will be necessary e.g. break glass call points will not be required. There are different levels of emergency lighting ranging from external borrowed lighting through to dedicated luminaires incorporating battery back-up. Most small lets only require a plug-in type lights incorporating battery back-up in case of loss of power.
Q:	On the fire advice it says fire exit doors must be opened with no key i.e push bar fire door or yale lock. My guests have a normal outside door with a key to access their part of the property. A condition of my b& b insurance is that this door must have a 5 lever notice local with a key. If I go with the fire regulations I won't be covered by my insurance?
A:	Locks are available that will provide 5-lever security and are key operated from the outside but which are hand operated from the inside.

Q:	My holiday home has a number of completely reupholstered chairs, new foam and new coverings. I also have an original Ercol chair which its no longer possible to get new foam for (it was originally formed using a mould), the original foam has been dacron wrapped by my upholsterer when the whole chair was redone. I also have a parker knoll statesman chair, again fully new foam and reupholstered, the issue might be that the original carcass/ shape of the chair is polystyrene.
	Would these 2 chairs meet the regulations? My upholsterer says yes but I'm keen to make sure.
A:	Without the presence of a label explicitly stating the chairs are compliant there is no way to know for sure. However, you upholsterer should know if it is compliant and if doubt exists there are fire retardant sprays available.
Q:	We are a bungalow, with 4 bedrooms, all off a main hallway, with hardwired smoke detectors at each end. No bedroom is more than 3 meters away from an alarm (nowhere near 3m)! Do I have to pay out for 4 more alarms, and installation, one for each bedroom, as we're over 3 bedrooms?
A:	Yes
Q:	We have two questions. Firstly what sort of emergency lighting is required in a small detached cottage with 3 upstairs bedrooms and secondly the main door to our cottage requires a key to unlock it on the inside. Will we be require to replace this door as we can't easily change the lock. NB the door is 8 years old and has a locking system which is installed takes up the whole of the length of the door.
A:	1. A plug-in type will normally be sufficient for small premises. 2. There are instances where locks are retained but are only used during times where the premises is not in use. A turnbuckle type lock is used at all other times. Make sure your insurance are aware of the locking system used.
Q:	It regards inner rooms.
A:	Non- domestic premises are not built with inner room sleeping due to the increase risk this presents to occupants of the inner room. However, this is not necessarily the case with domestic type premises. Inner room sleeping should be avoided where possible but this is not normally achievable in open plan premises. Your fire risk assessor should highlight the presence of inner rooms and offer advice regarding appropriate course of action. Fill in your checklist marking "no" against inner room sleeping and once received a member of SFRS staff will contact you to discuss the matter further.
Q:	If you have a small windowless boxroom leading from your living room, but your living room itself has an exit door leading directly outside, is this an inner room? terms of fire safety regulations could this room be used as a sleeping area / study room? Would the legislation change if the door was removed and it became more of a bed recess? Should it have a smoke alarm regardless of what it's being used for?
A:	This would be classed as an inner room. Please see information provided previously. There may be other issues at play that will make this room unsuitable for sleeping accommodation. If it has no windows it may not meet tolerable standards due to lack of ventilation but please take this up with your licencing authority as it is not my area of expertise.

Q:	I didn't get a fairly basic question answered: "is it a REQUIREMENT to replace any hollow doors or glazed doors that may not be fire glass....in 3 bed self-catering bungalow. I got the point that fire doors are not required, but "solid" doors and "fire glass "are mentioned in Annex A guidance (and by James Saunders talk) - this indicates advisable but not clear if it's an actual requirement in order to get licence. Obviously this is very costly and difficult to organise in time for licence. If I can't get an answer I may have to give up! I have hollow doors and 2 glazed doors to living room with open fire. Glazing is probably not fire glazing.
A:	All doors accessed from the escape route (hall), with exception of some WCs & small cupboards, should be of substantial construction and should be capable of protecting the means of escape in the event of fire. Hollow core doors and doors containing non-fire rated glass will not be capable of checking smoke & fire and should be replaced with suitable items. Contact your local office who will be able to discuss the requirements for you particular premises.
Q:	One thing that's been mentioned since, but I can't find info about it is that we may only need fire blankets and not extinguishers in small flats. Could you let me know if that's the case (I notice mine are out of date!)
A:	The Scottish Government guidance states that fire blankets are recommended in kitchens. All other provision, if any, will be highlighted during the fire risk assessment process.
	FIRE DOORS
Q:	Fire Doors- does every bedroom door need to be a self-closing fire door?
A:	<ul style="list-style-type: none"> • Yes. Self closer onto all Means of escape. The Scottish Government guidance does not require fire doors only that the door is substantial & in good condition and will give a nominal level of fire resistance. Self-closers (S/Cs) are not automatically required and their inclusion will be dependent on the layout of the premises e.g. S/Cs are not generally needed in single level premises.
Q:	Every kitchen to have a self-closing fire door?
A:	<ul style="list-style-type: none"> • Yes - see previous answer.
Q:	A self-closing fire door (FD 60?) on the ground floor, if property is more than 1 floor?
A:	<ul style="list-style-type: none"> • YES, 30 min will do As previously stated fire doors are not a prerequisite if current doors offer a nominal standard of fire resistance.
Q:	Inner rooms- is sleeping in ALL inner rooms prohibited, or only ones you travel through to get to an exit door?
A:	<ul style="list-style-type: none"> • Scottish Fire & Rescue would not use an inner room for sleeping. Inner room sleeping presents additional risk to the occupant in the event of emergency but they are not automatically prohibited from use.

Q:	Is a conservatory door, deemed as a Fire Exit? Or would same rules apply as Inner Room sleeping, as a table and chairs in a conservatory, could impair any escape?
A:	<ul style="list-style-type: none"> Has it got a thumb turn fitted, signage, emergency lighting? A conservatory door would not normally be deemed as an emergency exit however it could be required depending on travel distances within the premises. Any concerns regarding travel distances/final exit requirements should be recorded on the Short Term Lets checklist and a member of the local team will be in touch to discuss these. Escape route should be kept free from obstruction.

Scottish Fire & Rescue Service Links:

- [Fire safety: guidance for the hospitality industry - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Fire safety - existing premises with sleeping accommodation: practical guidance - gov.scot \(www.gov.scot\)](http://www.gov.scot)
- [Non-domestic fire safety - Fire and rescue - gov.scot \(www.gov.scot\)](http://www.gov.scot)
- [Scottish Fire & Rescue Service \(firescotland.gov.uk\)](http://firescotland.gov.uk)

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