

Fire Door Policy

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1. Introduction

- 1.1. Poplar HARCA has a responsibility to ensure that our buildings are safe and that, in the event of an emergency, escape routes are clear.
- 1.2. Fire doors play a crucial role in fire safety. They can delay the spread of fire, prevent smoke escaping and enable fire and rescue services to gain access to fight fire.
- 1.3. Poplar HARCA is committed to safeguarding the health, safety and wellbeing of everybody living, working or visiting our buildings, and to protecting our property.
- 1.4. This policy sets out the inspection and maintenance standards for fire doors in residential buildings for which Poplar HARCA has responsibility (as defined by the lease).
- 1.5. Throughout, where this policy refers to a leaseholder it includes shared owners.

2. Regulatory standards, legislation and guidance

2.1. Front doors in relevant Poplar HARCA buildings must comply with:

Regulator	 Regulatory framework and consumer standards (Home Standard) set out by the Regulator for Social Housing Building Safety Regulator (Health & Safety Executive) for buildings in scope of Building Safety Act
Legislation	 Building Safety Act 2022 Fire Safety Act 2021 Fire Safety (England) Regulations 2022 Regulatory Reform (Fire Safety) Order 2005 (FSO)
This policy also operates in the context of:	 Tenancy agreements and leases Building Regulations Housing Acts 1988and 2004 Landlord and Tenant Act 1985 Homes Act 2018 Defective Premises Act 1972 Health & Safety at Work Act 1974 The Management of Health & Safety at Work Regulations 1999 The Workplace (Health Safety & Welfare) Regulations 1992 Construction, Design and Management Regulations 2015 RIDDOR 2013

2.2. Sanctions

Failure to discharge these responsibilities in full could result in prosecution, unlimited fines, and/or regulatory downgrade.

3. Requirements

- 3.1. For all residential buildings over 11 metres in height, Poplar HARCA is required to:
 - Inform residents of the importance of front doors and reissue information annually

- Inform new residents of the importance of front doors at sign up
- Check all fire doors in common parts quarterly
- Check all dwelling front doors that lead to a building's common parts annually
- 3.2. Poplar HARCA must ensure that doors in its relevant buildings are of an appropriate specification, functional and maintained to a good standard.

4. Door specifications

4.1. A compliant fire door is one that is risk assessed to be suitable for the building, taking building height and means of escape into account.

Communal doors	Dwelling front entrance doors
 certified FD 30S or FD60S door set (as required by Building Regulations) or original door with door closer 	 certified FD30S or FD60S door set (as required by Building Regulations)or original door with door closer (notional FD30/FD60)

and, all doors must meet the following criteria:

- door closes correctly around the whole frame
- door closer is correctly fitted and fully functional
- seals and hinges are correctly fitted and fully functional
- gap between door and frame does not exceed 4mm
- gap between door and floor is as small as practicable while not resulting in snagging on the floor (3mm is the target)
- no visible damage to the door, door closer, letter plate, glazing or air transfer grille

In addition doors, especially those in higher risk buildings, should have:

- intumescent strips (plastic strips around the door that swell up when exposed to heat)
- cold smoke seals to the top and bottom edges of the door, these often look like brushes
- 4.2. uPVC front doors are not compliant.
- 4.3. **Internal fire doors:** Where it becomes apparent, e.g., during a property inspection, that a fire door such as a kitchen door is damaged or has been removed, Poplar HARCA will repair/replace this in tenanted properties in line with its Repair Policy. Internal doors are demised in the lease so it is the leaseholder's responsibility for repair/replacement.
- 4.4. **Security gates and grills:** Poplar HARCA does not normally authorise the installation of security gates and grills to dwelling front doors. Residents who already have security gates and grills installed are advised to remove them. If they do not then gates and grilles must be unlocked while homes are occupied.

5. Delivery

- 5.1. In order to meet requirements and ensure safety, Poplar HARCA will:
 - provide fire door information including the importance of keeping doors closed, not tampering with doors and self-closing devices, and the need to act on faults or damage immediately - when a resident signs up for a new property, and annually

- inspect communal fire doors in multi-occupied residential buildings quarterly to ensure it meets requirements
- inspect dwelling front doors (tenant and leasehold) in multi-occupied residential buildings 11m and over annually on a "best endeavours" basis. Three documented attempts will be made to carry out the inspection
- For buildings under 11m, doors to tenanted and leasehold properties will be inspected externally as part of the fire risk assessment process.
- repair and maintain fire doors for which it is responsible
- replace or upgrade tenant front doors and communal front doors in line with risk-based planned maintenance programmes
- ensure that staff and contractors responsible for door inspections, maintenance and replacement have the required competence
- manage access to residents' homes in accordance with Poplar HARCA's Access Procedure
- recharge residents for deliberate, negligent or accidental damage in line with Poplar HARCA's Repair Policy
- regularly review procurement approach and retender in line with the organisation's policies
- on request, provide door specifications and assistance regarding contractor competence to leaseholders

5.2. Poplar HARCA will not:

- repair or replace leaseholder front doors
- accept responsibility for the testing or maintenance of tenants' own installations or appliances

6. Follow on action

6.1. Poplar HARCA will ensure that there is a robust process in place for managing any follow on actions arising from door inspection programmes.

6.2. **Communal fire doors**

- 6.2.1. Remedial works will be actioned in line with Poplar HARCA's Repairs Policy.
- 6.2.2. If replacement is required, the new door will be a FD60S certified door set.

6.3. **Dwelling front doors**

6.4. Remedial works will be managed in accordance with tenancy agreements and leases.

	Poplar HARCA and Poplar HARCA Projects' Tenants	Leaseholders
Door owner	Poplar HARCA	Leaseholder
Post-inspection	Poplar HARCA will liaise with the tenant if follow on actions are needed.	Poplar HARCA will inform the leaseholder of the results of the fire door inspection and any action required.

Repair	Poplar HARCA to arrange for a competent contractor to carry out repairs.	Leaseholder to arrange repair works at their own cost.
Replacement Poplar HARCA will instruct a competent contractor to install a certified FD30S door set that meets British Standards BS476-22 - 31.1 or BS EN1634 parts 1, 2 and 3.	Poplar HARCA will provide the leaseholder with a specification for works and how to identify a competent contractor. Leaseholder are responsible for	
		arranging contractors and paying for works.
		Leaseholders may be required to carry out additional works as an interim measure while arranging the door replacement.
Enforcement	In line with Poplar HARCA's Access Procedure	Poplar HARCA has no right to take action against a leaseholder for failing to repair or replace their door unless enforcement action demonstrates breach of lease.
		Enforcement action can be taken by London Fire Brigade.
		The London Borough of Tower Hamlets may also take enforcement action against leaseholders who let their property in some circumstances.

7. Record keeping

- 7.1. Poplar HARCA will establish and maintain accurate asset registers for all domestic and non-domestic properties
- 7.2. Door inspection records will be stored in Poplar HARCA's central document repository in a standardised format.

8. Performance monitoring and reporting

- 8.1. There is a robust procedure in place for monitoring compliance and validating asset lists.
- 8.2. Key performance indicator (KPI) measures are in place, regularly reviewed and reported to senior management, other relevant staff, and the Board.

9. Roles and responsibilities

Poplar Board	Overall governance responsibility for ensuring that the
	organisation is compliant with regulatory standards,
	legislation and codes of practice.

Chief Executive	Strategic responsibility for ensuring that compliance is achieved and maintained.
Director of Technical Resources	Accountable for the strategic implementation of the fire door policy.
Deputy Director of Technical Resources	Responsible for the strategic implementation of the fire door policy.
Head of Asset Compliance	Accountable for day-to-day delivery of inspection programmes.
Compliance Co-ordinator (Building Safety)	Responsible for managing the delivery of fire door inspection programmes including record keeping, monitoring and quality control.
Contractor	Responsible for the operational delivery of fire door inspection programmes as directed by the Head of Asset Compliance.
Estate Services Team Leader	Responsible for the operational delivery of fire door inspection programmes as directed by the Head of Asset Compliance.

10. Policy review

10.1. Policies are reviewed every 5 years or sooner if they no longer reflect best practice.

11. Appendix 1: Impact assessment

How does the policy/procedure/strategy contribute to Poplar HARCA's aims? Which group(s) of people benefit from the policy/procedure/strategy? If any group could be disadvantaged, what is the mitigation or justification?	The policy is a statement of our intention to meet all statutory obligations associated with fire doors. All groups benefit from this policy in terms of Health & Safety. It is also beneficial for residents, staff and the Board to be aware of Poplar HARCA's statutory obligations.
How have residents been involved in developing the policy/procedure/strategy? If they have not been involved, why not?	The policy is a statement of our intention to meet all statutory obligations associated with fire door safety. There is no scope for resident involvement other than Board approval.
How will the policy/procedure/strategy be monitored and measured? (e.g. performance indicators?)	A requirement to monitor has been included in this policy document. Means of monitoring have been built into the Association's procedures.
If any, what are the Value for Money implications?	The policy is a statement of our intention to meet all statutory obligations. Value for Money is not a consideration for this policy.
Will personal data be collected, stored, used or shared? If yes, a privacy impact assessment must be carried out.	Yes, personal information may be shared with contractors (e.g. name, address, contact details) in order to allow them to carry out required works.