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Fire Risk Assessments for churches and charities

A Church Growth Trust Practical Guide
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1.0 Introduction

The Regulatory Reform (Fire Safety) Order 2005 (FSO) is the main piece of legislation governing fire safety in buildings in England and Wales.

The Order applies to all non-domestic properties, including church properties, and places duties on anyone in control of these premises (the Responsible Person) to undertake and record a Fire Risk Assessment (FRA) and to put in place and maintain general fire precautions.

The Responsible Person is the person responsible for the building and in the case of tenanted non-domestic properties accessed by the public, the Responsible Person is the occupier, not the building owner or trust.

Amendments to the FSO were made by Section 156 of the Building Safety Act 2022, which came into force on 1 October 2023. These amendments placed new responsibilities on the Responsible Person and below is a summary of the amendments which would apply to churches:

- The Responsible Person must record the completed FRA in full (where previously only specific information was required to be recorded). This means making available as much information as possible about fire safety at your premises.
- All Responsible Persons must record the identity of the person (and organisation if applicable) who has been engaged by them to undertake or review the FRA.
- All Responsible Persons must record their fire safety arrangements, demonstrating how fire safety is managed in the premises.
- All Responsible Persons must record and, as necessary, update their contact information including a UK-based address and share this along with other relevant fire safety information with other Responsible Persons of the premises.
- Any departing Responsible Persons must share all relevant fire safety information with incoming Responsible Persons.
- The Responsible Person has a duty to make sure that a suitable and sufficient FRA is completed, with a legislative requirement (to come into force at a later date) that where the Responsible Person appoints a person to make or review the FRA, that person must be competent to do so. This means that they must have the sufficient training, knowledge and experience.

2.0 What is a Fire Risk Assessment (FRA)?

An FRA looks at a building and assesses the risks of a fire starting, the risks to the building and, more importantly, people in the event that a fire were to start and considers the measures to reduce or eliminate the risk of fire.

3.0 Who is responsible for making sure an FRA has been done?

As noted in the introduction section, the FSO places a duty on the Responsible Person to undertake and record an FRA for non-domestic properties, including church buildings. In the example where there is a tenant church occupying a building owned by another organisation (as with churches occupying Church Growth Trust's properties), the Responsible Person would from be the tenant church occupying the building.

4.0 Do I, as the responsible person, have to produce the FRA or can I get someone else to do it for me?

The Responsible Person does not have to produce the FRA themselves. As noted within the introduction section amendments made to the FSO through Section 156 of the Building Safety Act 2022 placed new responsibilities on the Responsible Person, including ensuring that a suitable FRA has been completed and a legislative requirement that where the Responsible Person appoints a person to make or review the FRA that person must be competent to do so.

The changes emphasise that the person carrying out the FRA must have sufficient training, knowledge and expertise to do so. Therefore, it is most likely that within a church setting, the Responsible Person will have to engage a third party to carry out the FRA, except in the circumstances where there is somebody within the church who has the competence to carry out the FRA. In engaging a third party the Responsible Person should satisfy themselves of the competence of the assessor appointed by reviewing the certifications and credentials of their company or them as an individual.

5.0 What do we do with the FRA?

The FRA will usually result in your identifying fire safety measures and actions required to minimise the risk to life from fire, and these need to be implemented as soon as possible. The FRA will also likely stipulate ongoing actions that need to occur, such as regular testing of fire detection equipment to ensure that it is in good working order.

6.0 Is this a “one off” report?

No, the FRA must be kept up to date through regular review. CGT recommends that your FRA is reviewed at least every six months. This is because it will keep it in the forefront of everyone’s mind and any building layout alterations or use pattern changes of the building that may impact on the FRA can be identified and responded to quickly.

7.0 Is there anything else we need to do?

Yes, users of buildings, whether they do so frequently or as a one-off event, need to know what they should do if there is a fire. For this reason, measures need to be put in place to ensure that this happens, particularly if the building is hired out to third parties. The measures will be proportionate to the size of the building and the numbers of people likely to be in the building at various times. The FRA helps you to make sure you think about and address these issues. Some of the measures to be put in place include:

- Appointing fire officers from amongst the congregation or the other users of the church building.
- Making sure through signage and regular safety briefings that users know where the exits and assembly areas are and that they have identified their fire officers.

8.0 Are there things we have to do with the assembly/congregation?

Yes, for example there is a need to carry out regular fire drills. This will be at your main church meetings (usually on Sunday morning). In the event of a real fire some people will panic, people with accessibility issues will not be able to move fluently, and many people will not know what to do or where to go. Practising when there is not a fire will help people react calmly and correctly if there is a fire.

9.0 Is there a quick way of doing an FRA?

No, there is no shortcut document or method to an FRA. Each area of a building must be fully assessed, and any mitigating measures evaluated. It is key to ensure that the FRA is bespoke to the building in question rather than being generic in order for it to be most effective, and that is why it is vital for a competent and qualified person to carry out the FRA holistically.

10.0 Where do I start?

As mentioned in the previous sections it is unlikely that it will be the church itself who will be completing the FRA, unless there is someone within the church who has the expertise to do so. It is more likely that the Responsible Person will be engaging a third party to come to the building and conduct the FRA, so the first thing to do in this respect will be to source a person or company who can carry out the FRA and check that they have appropriate qualifications and certification to do so.

The National Fire Chiefs Council (NFCC) produce a range of guidance which includes guidance on finding a competent Fire Risk Assessor, and a web-link and QR code for this guidance is below:



[NFCC - Finding a fire risk assessor](#)

Ahead of your Fire Risk Assessor attending the building to conduct the FRA it would be worthwhile to review some of the guidance information published on the UK Government website in relation to checklists for the completion of FRAs, as this will allow for a useful and informed discussion with your Fire Risk Assessor when they are undertaking the assessment. Below are links for the '5-step fire safety risk assessment', which has been compiled as a checklist for small simple properties, and there is also a link for 'Fire safety risk assessment: small and medium places of assembly'.



[Five step fire safety risk assessment checklist](#)



[Fire safety risk assessments - small and medium places of assembly](#)

The following sections of this paper provide some general background information relating to the steps which are considered as part of the process of a FRA being undertaken. It would be helpful to be familiar with this information ahead of any discussion with the person carrying out a FRA for your church building. The steps focus on the identification of possible dangers and risks (fire hazards), the people at risk, the means of mitigating or removing any risks identified, and the recording and periodical review of information.

11.0 Identifying any possible dangers and risks

11.1 A source of ignition:

Examples of sources of ignition are as follows:

- cooking equipment, hot ducting, flues and filters;
- smokers' material (e.g. cigarettes, matches and lighters);
- electrical, gas or oil-fired heaters (fixed or portable), room heaters;
- hot processes (e.g. welding by contractors);
- faulty or misused electrical equipment;
- light fittings and lighting equipment (e.g. halogen lamps or display lighting);
- hot surfaces and obstruction of equipment ventilation;
- central heating boilers;
- naked flames (e.g. candles or gas or liquid-fuelled open-flame equipment);
- flares, fireworks and pyrotechnics and
- arson.

Further Guidance on regular testing of electrical and gas installations, together with maintenance and testing of portable electrical equipment is given in the Church Growth Trust Practical Guide: 'Electrical Tests and Gas Safety Checks for Church Buildings'.

11.2 Fuel

Examples of fuel are as follows:

- flammable liquid-based products, such as paints, varnishes, thinners and adhesives;
- flammable liquids and solvents, such as alcohol (spirits), white spirit, methylated spirit, cooking oils and disposable cigarette lighters;
- flammable chemicals, such as certain cleaning products and photocopier chemicals;
- flammable gases such as liquefied petroleum gas (LPG) and acetylene;
- displays and stands;
- costumes, drapes and hangings, scenery and banners;
- packaged foodstuffs;
- packaging materials, stationery, advertising material and decorations;
- plastics and rubber, such as video tapes, polyurethane foam-filled furniture, polystyrene-based display materials and rubber or foam exercise mats;
- upholstered seating, cushions, textiles, soft furnishings and clothing displays;
- litter and waste products, particularly finely divided items such as shredded paper and wood shavings, offcuts and dust accumulation near lubricated areas and
- fireworks and pyrotechnics.

11.3 Oxygen

The main source of oxygen for a fire is in the air. In an enclosed building this is provided by the ventilation system in use. This generally falls into one of two categories: natural airflow through doors, windows and other openings; or mechanical air conditioning systems and air

handling systems. In many buildings there will be a combination of systems, which will be capable of introducing/ extracting air to and from the building. Additional sources of oxygen can sometimes be found in materials used or stored at premises.

12.0 Who is at Risk?

You should consider who would be specially at risk. Examples of people who may be especially at risk are as follows:

- employees who work alone and/or in isolated areas (e.g. cleaners and caretakers);
- unaccompanied children;
- people who are unfamiliar with the premises (e.g. visitors and customers);
- people with disabilities, including mobility impairment, or hearing or vision impairment;
- people who may have some reason for not being able to leave the premises quickly;
- other people in the immediate vicinity of the premises.

13.0 Remove or reduce risks

You should consider what reasonable action can be taken to remove or reduce risks from fire.

13.1 Remove or reduce sources of ignition

Some examples of removing or reducing the sources of ignition are as follows:

- Wherever possible replace a potential source by a safer alternative (e.g. using an induction hob rather than a gas hob).
- Restrict and control the use of naked flames (e.g. candles).
- Ensure that sources of heat are kept away from flammable materials such as curtains, scenery and displays.
- Ensure electrical, mechanical and gas equipment is installed, used, maintained and protected in accordance with the manufacturer's instructions.
- Ensure cooking and catering equipment is installed, used, maintained and protected in accordance with the manufacturer's instructions.
- Take precautions to avoid arson (e.g. with security lights or an alarm).

13.2 Remove or reduce sources of fuel

Some examples of how to remove or reduce sources of fuel are as follows:

- Ensure that all upholstered furniture, curtains, drapes, other soft furnishings, display materials (including artificial and dried foliage), scenery and stands are fire-retardant, or have been treated with a proprietary fire-retardant treatment, designed to enhance their fire performance.
- Ensure flammable materials, liquids and gases are kept to a minimum and are stored properly with adequate separation distances between them.
- Remove, cover or treat large areas of highly combustible wall and ceiling linings (e.g. polystyrene or carpet tiles), to reduce the rate of flame spread across the surface.

13.3 Remove or reduce sources of oxygen

Examples of how to remove or reduce sources of oxygen are as follows:

- Closing all doors, windows and other openings not required for ventilation, particularly at times when the building is not being used.
- Not storing oxidising materials (including pyrotechnics and fireworks) near or with any heat source or flammable materials.

14.0 Provide fire precautions

Where there are still risks you should consider additional fire precautions. The minimum you should consider will include the following:

14.1 A fire detection and warning system

You must have a suitable fire-detection and warning system. This can range from a shouted warning to an electrical detection and warning system. Whatever system you have will depend on the scale, complexity and use of the building but it must be able to warn people in all circumstances. Should you wish to discuss the type of fire detection and warning system that you need to install to your premises, it is recommended that you speak with your Local Authority Building Control Department who should offer a Duty Surveyor service that will be able to assist with this query. Your Fire Risk Assessor should also be able to advise upon the type of fire detection and warning system needed, including any upgrades required to existing systems.

14.2 A way of fighting a small fire

It is a requirement of the FSO to have firefighting equipment in the form of extinguishers to be provided in non-domestic buildings. The requirement is to have a minimum of two 'Class A' fire extinguishers on every storey of the building. An example of a Class A extinguisher would be a 9-litre water extinguisher. In addition, there is a requirement for all premises which have electrical equipment to have a carbon dioxide extinguisher also, which is usually paired with the other Class A water or foam extinguisher present. It is typical for the extinguishers to be located by exits and fire alarm call-points.

Whilst you can purchase fire extinguishers directly online rather than through a fire protection company, they must be commissioned on site-by a competent person, meaning in this case someone who has passed the BAFE fire extinguisher exam or has a relevant qualification. There is also a requirement for all extinguishers to be checked/serviced annually and refilled or replaced every 5 years for water and 10 years for carbon dioxide extinguishers.

Given these factors, and that it is the duty of the Responsible Person under the FSO to ensure that a competent person has commissioned the fire extinguishers, the simplest approach to ensure full compliance is to engage a reputable fire protection company to supply, install and commission the extinguishers along with regularly servicing and replacing them as required. In many cases fire protection companies who carry out this work can also offer the service of completing a FRA for the church, which can further simplify things from the perspective of the church.

For further information more detailed guidance on the types of extinguishers and the type of fires for which they are suitable is given in the government publication 'Fire Risk Assessments: Small and Medium Places of Assembly', details of which are given in Additional Information below.

14.3 Safe routes to leave the premises

The ideal situation is when there is more than one escape route from all parts of the premises, although this is not always possible. If only one route is available, you may need to make it fire-resisting (protected) or install an automatic fire-detection system. The distance people need to go to escape (the travel distance) should be as short as possible. The travel distance should be measured from the farthest point in a room to the door of a protected stairway or, if there is no protected stairway, to the final exit from the building.

If there is only one escape route, the travel distance should not normally be more than 18 metres. If there is more than one escape route, the travel distance should not normally be more than 45 metres. Where seating is arranged in rows, the travel distances should be reduced to 15 metres if there is only one escape route or 32 metres if there is more than one escape route.

Travel distances are the actual distance along the route which needs to be taken, including any necessary allowance for going around furniture or other obstructions. Where the internal layout of furniture etc is not known or varies for events, a straight-line distance can be measured from the furthest part of each room and this will be assumed to be only two thirds of the actual travel distance.

More detailed guidance on travel distances and escape routes is given in the 'Church Growth Trust Practical Guide: Fire Exits and Escape Routes in Church Buildings'.

Stairways, corridors and areas near the fire exits should be kept clear of obstructions and material which can catch fire. The escape route should lead to a final exit and a safe place. If the stairway is not protected, the travel distance should be in line with those suggested above for single escape routes and the final exit should be easy to see and get to from the stairway at ground-floor level. High-risk rooms should not generally open directly into a fire-protected stairway.

14.4 Suitable fire exit doors

You should be able to use fire exit doors and any doors on the escape routes without a key and without any specialist knowledge. External fire exit doors such as those from a main worship space may feature security locks that are used when the building is empty, but these locks must be subject to a management policy procedure when the building is in use to ensure they are not locked and can be used as a means of escape. A way of ensuring means of escape is to have escape hardware on the inside of the door that can override the lock such as panic push-bar or an internal thumb-turn, and the number of people expected to use the exit would define what type of escape hardware to use.

More detailed guidance on fire exit doors, their ironmongery and locks is given in the Church Growth Trust Practical Guide: 'Fire Exits and Escape Routes in Church Buildings'.

14.5 Other things to consider

There are a number of other matters to consider, including the following:

- Whether you need emergency lighting.
- Suitable fire exit signs in all but the smallest premises.
- Training for your staff or anyone else you may reasonably expect to help in a fire.
- A management system to make sure that you maintain your fire safety systems.

Some very small and simple premises may be able to satisfy all these steps without difficulty. However, you should still be able to show that you have carried out all the steps.

15.0 Take other protection measures

You should consider taking other measures to make sure there is protection if flammable or explosive materials are used or stored.

16.0 Produce a plan for emergencies

You should produce a plan to deal with any emergencies. The plan should outline the necessary action required and who is responsible for the action in the case of fire, including evacuation procedures. All staff or key volunteer workers, such as caretakers or administration staff should be made aware of the plan, together with group leaders of the various church activities, to ensure the key leaders in the building are aware of the agreed action and procedure in the case of fire.

17.0 Is there any other advice CGT thinks important or helpful?

Yes, please refer to the points below:

- Ensure that the church is clear on who has been appointed as the Responsible Person within the church as this person is responsible for ensuring the completion and periodical review of the FRA. Make sure the Responsible Person is well supported by the church and that from the leadership downwards there is a strong and visible commitment to act safely.
- Ensure that if hiring of the building takes place all users of the property are informed about the contents of the FRA and made aware of the fire safety procedures, and that they acknowledge this in writing and that they commit to acting safely. This can often be done with a hiring agreement (CGT have produced a Hiring Agreement Pack that can be purchased from the office – enquiries@churchgrowth.org.uk).
- Ensure that proper funds are made available where necessary for recommended alterations and fire safety measures.

Remember that fire kills and that it is essential for everyone's safety that a Fire Risk Assessment is carried out and kept up to date.

18.0 Additional information

Fire Safety Risk Assessment: 5 Step Checklist.
Available as a download from:



[Five step fire safety risk assessment checklist](#)

Fire Risk Assessment: Small and Medium Places of Assembly.

Available as a download from:



[Fire safety risk assessments - small and medium places of assembly](#)

Church Growth Trust Practical Guide: [Fire Exits and Escape Routes in Church Buildings](#).

Church Growth Trust Practical Guide: [Electrical Tests and Gas Safety Checks for Church Buildings](#).

The Building Regulations: Fire Safety Approved Document B Volume 2: Buildings other than dwellings

Available as a free download from:



[Building regulations - approved document B2](#)

