

Structure and Content of a Fire and Emergency File (FEF)

Guidance Note: 10 / Annex: 10A / Version: 1.0 Date: 04/06/2026

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A.1 Purpose of this Annex

This annex provides practical guidance on the **structure and content** of a Fire and Emergency File (FEF). This guidance should be read in conjunction with the relevant regulatory provisions.

It outlines a structured framework that applicants may use when preparing or reviewing a FEF for Gateway 2 and Gateway 3.

It does not prescribe format. However, it identifies the components and structural features commonly observed in high-quality submissions that:

- support regulatory assessment;
- maintain traceability between design intent and occupation-stage management; and
- enable the FEF to function as authoritative safety information.

A.2 Overarching Principles

A high-quality FEF typically demonstrates the following features:

A.2.1 Clear hierarchy

The document should follow a logical progression (and incorporates the relevant requirements of [Schedule 1 of The Building \(Higher-Risk Buildings Procedures\) \(England\) Regulations 2023](#)):

1. **Purpose and scope**
2. **Description of the building**
3. **Matters considered in assessing building safety risks**
4. **Proposals adopted and compliance strategy**
5. **Operational and management arrangements**
6. **Fire and rescue service provisions**
7. **Compliance demonstration**
8. **Supporting evidence (summarised and referenced)**
9. **Information management and version control**

This hierarchy ensures that the reader moves from *context* to *risk consideration*, to *design response*, to *operation in practice*.

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A.2.2 Structured Approach

A high-quality FEF should be clear and proportionate and is not meant to operate as a repository of documents.

It should:

- summarise technical material;
- explain relevance;
- identify reliance and interdependencies; and
- reference detailed material held elsewhere.

Where detailed reports (e.g. Computational Fluid Dynamics (CFD) and fire modelling, structural design philosophy, fire strategy drawings) exist, the FEF should explain:

- what question the report addresses;
- what conclusion was reached; and
- how that conclusion informs life safety outcomes.

A.2.3 Explanation of safety intent

Early in the document, the FEF should clearly articulate:

- the intended evacuation strategy;
- the structural robustness approach – structure and fire periods;
- the overarching life safety objective; and
- the role of fire and rescue service intervention, including initial attendance and post incident.

This should be framed in outcome-led terms rather than as a list of compliance statements.

A.3 Core Sections of a High-Quality Fire and Emergency File

The following structure of a FEF reflects good practice.

A.3.1 Purpose and scope

This section should:

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- define the purpose of the FEF at the relevant Gateway stage;
- state whether the document is provisional (Gateway 2) or definitive (Gateway 3);
- describe how it relates to the fire safety strategy and structural design intent; and
- confirm its role within the Golden Thread.

At Gateway 2, assumptions and dependencies should be clearly flagged. At Gateway 3, these must be validated or closed out.

A.3.2 Description of the building

A high-quality FEF includes a concise but complete building overview, including:

- height and storey count including basements;
- occupancy types;
- evacuation strategy or strategies depending on use;
- key fire safety systems;
- structural form and robustness class (Part A3 – class 2 or 3 building - tying forces etc and design for appropriate fire periods);
- fire and rescue service access arrangements.

The purpose of this section is not description for its own sake, but to provide context for understanding risk and safety strategy.

A.3.3 Matters considered in assessing building safety risks

A building safety risk is a risk to safety of people in or about the building following spread of fire or structural failure.

This section should explain:

- how building characteristics influence fire and structural risk;
- occupancy assumptions and behavioural considerations;
- foreseeable emergency scenarios;
- dependencies on systems or management intervention; and
- potential consequences of fire or structural failure.

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Good practice includes:

- explicit treatment of stay-put or simultaneous evacuation logic;
- consideration of mobility-impaired occupants;
- articulation of worst credible conditions;
- explanation of structural robustness classification (for prevention of progressive collapse);
- Risk Assessment related to disproportionate collapse as per Section 5 AD A - clause 5.1.e (to inform the In occupation Building Risk Assessment for the Building Assessment Certificate (BAC));
- explanation of compartmentalisation strategy; and
- explanation of safety management strategies.

The section should explain *why risks matter*, not merely list hazards.

A.3.4 Proposals Adopted and Compliance Strategy

This section should:

- explain how relevant functional requirements have been addressed and met;
- describe the relationship between prescriptive guidance and engineered judgement;
- identify where performance-based analysis has been undertaken;
- explain any departures from benchmark guidance, codes and justification; and
- identify system interdependencies.

The emphasis should be on *logic and coordination*, not compliance assertions.

Where multiple standards are referenced, the document should clarify:

- which provisions were relied upon;
- why that approach was selected; and
- how consistency was maintained.

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A.3.5 Operational Management Arrangements

High-quality FEFs commonly include emergency-based scenarios to explain design intent and should be expressed alongside a clear description and understanding of the operational management arrangement that will be, or are required to be, in place

These should:

- describe credible fire origins and structural risks;
- Clearly set out the cause and effect:
- illustrate system activation sequences;
- explain required management response
- explain occupant response;
- describe anticipated fire and rescue service intervention; and
- identify redundancy and arrangements for additional, necessary resilience.

Emergency scenarios should not introduce any new analyses. They should explain how previously described measures operate together in practice.

They are particularly valuable where:

- evacuation relies on a complex system performance;
- structural robustness interacts with fire strategy;
- Structural design solutions are complex; or
- redundancy measures are material to life safety.

A.3.5.1 Management of building safety risks

This section should translate design intent into operational arrangements.

Good practice includes tabulated presentation of:

- each critical fire safety measure;
- its purpose;
- management responsibility;
- maintenance standards (including structure integrity);
- monitoring and fault response arrangements; and
- regulatory notification triggers (where applicable).

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The emphasis should be on:

- clarity of reliance;
- allocation of responsibility; and
- traceability between design assumption and management control.

A.3.5.2 Design resilience and redundancy

High-quality submissions explicitly address system failure scenarios.

This includes:

- consequences of failure;
- layered fallback measures;
- secondary systems and operational reliance;
- alternative evacuation paths; and
- structural robustness.

This section should demonstrate that life safety does not rely on a single point of failure unless clearly justified. It should explain degraded conditions and fallback strategies.

A.3.6 Fire and Rescue Service Access and Facilities

The FEF should:

- clearly describe access routes;
- identify firefighting shafts and lifts;
- explain water supply arrangements;
- summarise tactical firefighting assumptions;
- explain variations from common designs; and
- identify site-specific constraints or dependencies.

Drawings should support, not substitute for, explanation.

A.3.7 Compliance Demonstration

This section should provide a structured explanation of:

- relevant functional requirements;

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- how the design responds to each functional requirement;
- how compliance was verified;
- assumptions affecting compliance and associated mitigations; and
- commissioning and validation processes.

At Gateway 2:

- explain how compliance will be achieved.

At Gateway 3:

- confirm how compliance was achieved.

A.3.8 Supporting Evidence

Supporting documents should be:

- listed clearly;
- categorised by discipline; and
- briefly described as to purpose and relevance.

The FEF should avoid embedding large volumes of drawings or technical detail unless necessary to explain reliance.

A.3.9 Information Management and Version Control

A High-quality FEF should:

- include revision history;
- identify author, checker, and approver;
- describe document governance;
- confirm change management process; and
- demonstrate traceability across Gateways.

Gateway 3 versions should adopt a definitive tone and remove provisional language.

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A.3.10 Presentation Characteristics

A high-quality FEF typically demonstrates:

- clear section numbering;
- consistent terminology;
- avoidance of unexplained acronyms;
- structured tables for system management;
- diagrammatic clarity where beneficial;
- cross-referencing rather than duplication; and
- intelligible narrative rather than technical silos.

The document should be readable by:

- regulators;
- dutyholders;
- asset owners;
- building managers; and
- residents.

It should assume a level of knowledge that could be reasonably known by the above persons.

A.3.11 Indicators of a high quality Fire and Emergency File

A FEF may be considered high quality where it enables a reader to answer appropriate questions clearly. Example questions include but not limited to:

1. What are the principal fire and structural safety objectives?
2. How were building safety risks assessed?
3. How does the design satisfy the functional requirements?
4. What assumptions underpin safety performance?
5. What happens if key systems fail?
6. Who is responsible for maintaining safety measures?
7. How does firefighting intervention integrate with the strategy?
8. What changed between Gateway 2 and Gateway 3?

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9. Can this document be relied upon in occupation?

If these questions cannot be readily answered from the FEF, the document is unlikely to meet the characteristics of a high-quality submission.

NOTE: This guidance note should be read in conjunction with:

[CLC Guidance Note 10 – Fire and Emergency File](#)