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Behavioural Principles When Developing, Reviewing and Auditing Fire Risk Assessments and Fire Risk Appraisals of External Walls

This note is presented as industry guidance. It does not constitute statutory guidance, government guidance or an interpretation of PAS 9980:2026.

1. Introduction

- 1.1. Fire risk assessments (FRA) and fire risk appraisals of external walls (FRAEW) are primarily carried out for the purpose of meeting legal duties such as compliance with the [Regulatory Reform \(Fire Safety\) Order 2005](#), however they may also be completed for various other purposes including in relation to remediation funding. FRAs and FRAEWs should not be treated as separate standalone documents. Rather, they must align and complement one another, with findings from the FRAEW informing the overall fire risk assessment and wider fire risk management strategy for the building. Whatever their purpose, they should be undertaken by suitably competent persons who are able to consistently demonstrate that they possess the appropriate skill, knowledge, experience and behaviours.
- 1.2. Recent observations on behavioural approaches informing the completion and quality of these types of assessments have been identified as disparate and inconsistent; with authors, reviewers and auditors sometimes applying bias and preconception to their analyses. Where this occurs, it creates a risk of disproportionate recommendations being made.
- 1.3. It is therefore appropriate to remind practitioners of the fundamental principles that should be applied when undertaking and auditing FRA and FRAEW, enabling the production of consistent, proportional, technically proficient assessments underpinned by a robust evidence base.
- 1.4. In the longer term, the Government has committed to delivering the Grenfell Tower Inquiry recommendations for fire engineers and fire risk assessors, including the recognition and protection of the fire engineer profession by law, including defined standards for

membership of the profession, and introduction of a system of mandatory accreditation to certify the competence of fire risk assessors.

2. Industry Context

- 2.1. Fire risk assessments are often completed using the recommendations made in [PAS 79-1](#) and [BS 9792](#).
- 2.2. [PAS 9980](#) is used by practitioners to undertake the completion of FRAEW. The updated PAS 9980:2026 was published 30 September 2026.
- 2.3. Industry guidance is typically developed to demonstrate what 'good looks like' and provides practical recommendations that support the consistent application of that guidance, with the purpose to encourage standardised practices across industry.
- 2.4. However, for such guidance to be effective, it needs to be understood and applied by competent and conscientious professionals. Efforts should be made by those directly and indirectly affected by the application of such guidance, ensuring the right behavioural approaches are being demonstrated by those completing these types of assessments.

3. Scope

- 3.1. This guidance note provides information for those directly and indirectly impacted by the undertaking of fire risk assessments (FRA) and fire risk appraisals of external walls (FRAEW). This includes, but is not limited to:
 1. Authors
 2. Reviewers
 3. Auditors
 4. Commissioning parties
 5. Regulatory bodies
 6. Lenders, valuers and other parties relying upon the outputs
 7. Any identified stakeholder of the bodies listed above.

- 3.2. This note is designed to encourage a consistent behavioural approach for the completion, assessment, review and auditing of any such assessment and/or appraisal.

4. Application of Relevant Industry Guidance

- 4.1. PAS 9980, PAS 79-1 and BS 9792 provide consensus developed recommendations for the undertaking of FRA and FRAEW. As with all standards, these have no legal weight in and of themselves; users are free to use them as they see fit.
- 4.2. Users of these standards should apply their recommendations in the development of their assessments, reviews or audits, depending upon the task they have been asked to complete. This includes demonstrating that the competency requirements in the standards have been met, as appropriate for the tasks being undertaken, and providing evidence of this as required. When assessing whether practitioners are competent, those commissioning FRA and FRAEW should satisfy themselves that the users they have appointed are suitably competent for the specific task they are to undertake.
- 4.3. There are a range of professional backgrounds which create competent users of these standards; those commissioning FRAs and FRAEWs should consider the competence criteria in their full context, rather than limiting themselves to any predefined qualifications, credentials or memberships.
- 4.4. Parties commissioning or relying upon an FRA, FRAEW or EWS1 may choose to apply acceptance criteria in addition to those set by legislation, relevant standards or the EWS1 process. Where they do so, those criteria should be identified transparently as the requirements of that party and should not be represented as requirements of the underlying technical standard or process. Professional registration, title or membership can provide relevant evidence of competence, but does not of itself demonstrate competence for the specific task.

- 4.5. Whether undertaking, reviewing or auditing an FRA or FRAEW, the practitioner is encouraged to clearly demonstrate how they have:
1. Applied the guidance;
 2. Cited specific clauses of the guidance during the application of the guidance; and
 3. Reached conclusions and recommendations which are dispassionate, proportional and evidence based.
- 4.6. Some practitioners will go beyond this and produce reports which self-identify as being fully in accordance with a relevant standard (this is particularly common with FRAEWs to PAS 9980). Where such a declaration is made, it is particularly important that the relevant standard has truly been adhered to; if not, reports risk being misleading.

5. Expectations of Users of the Standards

- 5.1. Individuals and organisations will inevitably have differing attitudes to risk. Professional assessments, however, should not be driven by the personal risk appetite of the practitioner. Relevant standards provide consensus-developed methodologies and benchmarks intended to support consistent and proportionate assessment of risk.
- 5.2. It is not possible to entirely eliminate risk, however a suitable and sufficient risk assessment/appraisal which concludes that risk is low, tolerable or in some other way acceptable, should make clear to the reader why significant harm is only a remote possibility, and how lesser harms have been adequately addressed. Effective communication of these concepts is key to enabling readers of FRAs and FRAEWs to have confidence in the work being carried out, while maintaining realism about their ongoing duties to manage and mitigate risk. Effective communication will also assist professionals and enforcing authorities to understand each other's thinking in respect of any one building so that differences of opinion can be explained in the hope of reaching consensus.

- 5.3. Similar to above, it is not possible or desirable for any one feature of a building to entirely solve the question of fire safety. For example, while FRAEWs need to consider the wider fire safety context of the buildings they address, they should not attempt to solve all of a building's fire safety issues. Conversely, an FRA cannot be suitable and sufficient where a material risk associated with the external walls, falling within the scope of the assessment, has not been properly considered. All of a building's fire safety features (e.g. fire detection and alarm, means of escape, compartmentation, facilities for the fire service) are intended to work together to provide multiple layers of safety for occupants.
- 5.4. Residents having a voice in the fire safety of their home must continue to be a priority. Residents need to be afforded the opportunity to understand the issues identified by fire risk assessors and appraisers of external walls. They can only do so when users, and in turn those procuring FRA and FRAEW, communicate effectively. The importance of success in this regard cannot be overstated because it will mean that when residents are provided the findings of FRA and FRAEW, they can understand these in their full context.

6. Risk Versus Compliance

- 6.1. Risk assessment and appraisal of existing buildings will necessarily be informed by current expectations of fire safety but should not be couched in [Building Regulations](#) (which apply to defined work to existing buildings, alterations and material changes of use). [Approved Document B](#) provides statutory guidance on meeting Building Regulations requirements and is not, in itself, a risk assessment methodology.
- 6.2. Similarly, reliance on previous editions of Approved Document B will be relevant to questions of whether a building was constructed in accordance with expectations at the time of construction, but these expectations are necessarily not informed by the extensive work which has been undertaken in the aftermath of the fire at Grenfell Tower, to better understand external wall fire spread and other issues, and the steps needed to keep people safe.
- 6.3. Proportionality should be at the heart of both FRA and FRAEW; this is expected to occur in two ways:

- The process to complete these needs to be proportionate, adapting to the specific circumstances of each building on its merits. FRA and FRAEW which can be properly concluded quickly, typically with a clear conclusion that the risk is either high or low, should be concluded quickly and efficiently.
- Where the risk falls between high and low, risk assessors and appraisers are expected to consider the specific causes of the elevated risk and the various steps which might be taken to address or mitigate against those causes. Proportionality, which is the corollary of the principle of reducing risks to as low as reasonably practicable, requires consideration to be given to the time, disruption and cost which would be associated with these steps, versus the benefit they would actually achieve.

7. Review and Auditing

- 7.1. It has become common practice for independent parties to be commissioned to review the findings of either an FRA or FRAEW, or both, when initially undertaken by a separate independent party.
- 7.2. Attention is drawn to the potential for professional bias and preconceived views that each party being requested to undertake a review or audit may bring into the review or auditing process. An instruction to undertake a review or audit should be conducted by the appointed party on the basis that adherence to the requirements of the standard are the primary subject of the review and or audit. This contrasts with current and observed industry practice where a professional, yet subjective assessment of the recommendations and conclusions of a report are, in many cases, the only focus.
- 7.3. Reviewers and auditors are encouraged to consider if and how the original author of an FRA or FRAEW have applied the relevant guidance, to determine if the conclusions and recommendations are commensurate to the identified risk, not whether they would have reached the same conclusion if they had done the work themselves. The process of peer review challenge is one which should be welcomed as a means of ensuring that conclusions are readily understandable, robust and supported by evidence, which will help drive towards a narrower range of outcomes on any one building.

8. Signatories

- 8.1. In many instances, multiple individuals may play an active part in the authoring, reviewing and approving of an FRAEW or FRA. Where any individual has undertaken a task in the development, review or approval of such reports, these reports should clearly identify:
1. **Who** each contributing party is;
 2. **What** role each has played in the publishing of the report;
 3. **What** their parties' relationship is to the publishing body of the report; and
 4. **How** the basis upon which their competence for the specific task has been demonstrated.

9. Summary

- 9.1. The risk of disproportionate and unevidenced recommendations from FRA and FRAEW may have unintended consequences on the primary objective - to keep people safe from the effects of fire.
- 9.2. Practitioners and auditors should focus upon the life safety objectives of their assessments and should also consider the consequential impacts placed upon residents from disproportionate recommendations leading to remediation, including the wider financial burden placed upon society. If practitioners or auditors are tasked with meeting a different objective, such as property protection, then this needs to be clearly stated.
- 9.3. Those who are appointed to complete, review or audit FRA and or FRAEW are strongly encouraged to consider the scope and application of the guidance they are using to inform their reports. There should be a clear demonstration of where the relevant processes and recommendations from the guidance have been applied, and how and why the conclusions that have been drawn are founded from a technical basis; and are evidence based, consistent and proportional to the identified risk. Departures from standards need to be clearly set out so as not to mislead, especially where compliance with a standard is being declared.

This advisory note has been published by the Construction Leadership Council (CLC) and was authored by Aman Sharma MBE, Chairman of BSI Fire & Built Environment Sector Policy and Strategy Committee (FSH/0) and Dr. David Crowder, Lead Technical Author of PAS 9980. It has been reviewed by Jon Vanstone, Chair of the Industry Competence Committee (ICC).

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