What You'll Learn

This guide is designed for **hotel operations directors** and **multi-site hospitality operators** who need to understand what a **hotel fire risk assessment** actually requires and why a generic premises assessment doesn't meet the standard when people sleepon site.

Key Takeaways

- Hotels face a categorically different fire risk because guests are asleep and unfamiliar with the layout.
- A generic FRA that doesn't address sleeping accommodation risk gives false confidence
- The out-of-hours gap — between tested conditions and real conditions — is where exposure concentrates.
- Pre-acquisition and pre-opening FRAs are due diligence tools, not just compliance exercises
- Consistent methodology across a hotel portfolio makes risk comparable and capital allocation defensible

A **firerisk assessment for a hotel** is not the same exercise as one for an office block or a warehouse. The moment you add sleeping accommodation, the regulatory expectations change, the liability exposure increases, and the consequences of getting it wrong become fundamentally different. Most hotel operations directors know they need one. Fewer know what a genuinely thorough one looks like when applied to a building where hundreds of people sleep.

Why Hotels Are in a Different Fire Risk Category

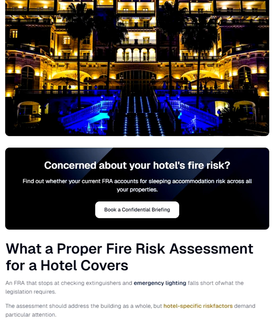
The **Regulatory Reform (Fire Safety) Order 2005** applies to all commercial premises. Buthotels sit in a category of their own because of one factor: people sleepthere.

Sleeping occupants change every assumption in the fire safety model. An office building empties in minutes during daytime evacuation. A hotel evacuation at peak periodis awakeare, alert, and familiar with the layout. A hotel at 2am contains guests whoare asleep, disoriented, and navigating corridors they walked once on the way from check-in. Some have consumed alcohol. Some have mobility issues they didn't declare at check-in. Children are present. The **evacuation dynamic** is nothing like a daytime commercial premises.

This is why a **fire risk assessment for a hotel** carries a different weight. The **responsible person**, typically the hotel operator, holds a legal duty to ensure the safety of everyone on the premises. In a hotel, that includes guests who may not encounter fire safety measures and no knowledge of the evacuation plan. They can't influence the maintenance standard on the **fire doors** betweentheir room and the nearest stairwell. They've entirely dependent on the decisions getting it right.

The **liability framework** reflects this. Enforcement action following a fire in a hotelwith sleeping accommodation is more severe than in premises where occupants are awake. **Prohibition notices**, prosecution, and custodial sentences are alon the table when an inadequate assessment contributes to harm. The Grenfell Tower Inquiry has sharpened regulatory attention on fire safety in allbuildings with **sleeping risk**. Hotels are firmly in that spotlight.

For operations directors managing hotel portfolios, this creates a clear obligation. Every property needs an FRA that accounts for sleeping risk specifically. A generic assessment that treats the hotel like any other commercial building misses the point entirely.



Concerned about your hotel's fire risk?

Find out whether your current FRA accounts for sleeping accommodation risk across all your properties.

Book a Confidential Briefing

What a Proper Fire Risk Assessment for a Hotel Covers

An FRA that stops at checking extinguishers and **emergency lighting** falls short ofwhat the legislation requires.

The assessment should address the building as a whole, but **hotel-specific riskfactors** demand particular attention.

Commercial Kitchens

Commercial kitchens carry the highest ignition risk in most hotel properties. Extract systems, **grease buildup** in ductwork, deep fat fryers, and the proximity of high-heat cooking to combustible materials all require specific evaluation. A kitchen fire in a hotel doesn't just threaten the kitchen. Smoke travels through **service corridors**, guest floors, and ventilation systems in waysthat an assessor needs to trace and account for.

Guest Corridors and Bedroom Floors

Guest corridors and bedroom floors present the **sleeping accommodation risk** directly. **Fire doors** on every guest room must be self-closing andproperly maintained. Corridor widths, **travel distances to protected stairwells**, and the condition of **fire-stopping between rooms** all factor into the assessment. In older or heritage buildings, the original construction may not meet current **compartmentation standards**. Theassessor needs to identify where remedial works are required, not just note that the building is old.

Back-of-House Areas

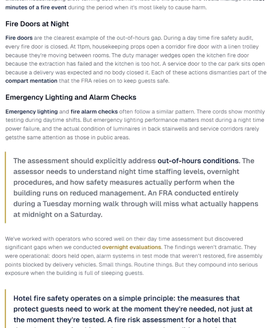
Back-of-house areas carry risks that are easy to overlook because guests never see them. Staff changing rooms, **linen stores**, maintenance workshops, and plantrooms all have their own fire risk profiles. Linen stores in particular represent a significant **fire load**. We've assessed hotel properties where the linen store sat directly below guest bedrooms with inadequate compartmentation between the two. That's a finding that changes the **risk rating** of the entire building.

High-Occupancy Event Spaces

High-occupancyevent spaces add complexity. A hotel with a 500-person ballroom, a conferencesuite, and multiple restaurant covers creates **variable occupancy patterns** that the FRA must account for. The **means of escape** that works for 30 diners at breakfast may not work for 400 conference delegates and 200 wedding guests at the same time.

External Factors

Hotel fire safety also extends to external factors. Car parks beneath the building, neighbouring premises, roof-level plant, and **external cladding** all form part of a thorough assessment. Any assessment that focuses only on the internallayout is incomplete.



Managing multiple sites?

Understanding how EHO inspectors assess your operation is just as critical as your FRA. Read our full guide on preparing for an EHO inspection when you run 50+ sites..

Read the EHO Inspection Guide

The Out-of-Hours Hotel Fire Safety Blind Spot

Fire safety in a hotel doesn't operate on office hours. The **risk profile at 3am** is categorically different from the risk profile at 3pm. Most fire safety audit shapeon during the day. The problems live at night.

Night Teams

Night teams are typically smaller, less experienced, and operating with less supervision than daytime staff. The night porter covering reception, the single security guard walking the floors, the skeleton housekeeping team turning downrooms. These are the people who would manage the **first minutes of a fire event** during the period when it's most likely to cause harm.

Fire Doors at Night

Fire doors are the clearest example of the out-of-hours gap. During a day time fire safety audit, every fire door is closed. At 11pm, housekeeping props open a corridor fire door with a linen trolley because they're moving between rooms. The duty manager wedges open the kitchen fire door because the extraction has failed and the kitchen is too hot. A service door to the car park sits open because a delivery was expected and no body closed it. Each of these actions dismantles part of the **compart mentation** that the FRA relies on to keep guests safe.

Emergency Lighting and Alarm Checks

Emergency lighting and **fire alarm checks** often follow a similar pattern. There cords show monthly testing during daytime shifts. But emergency lighting performance matters most during a night time power failure, and the actual condition of luminaires in back stairwells and service corridors rarely getsthe same attention as those in public areas.

The assessment should explicitly address out-of-hours conditions. The assessor needs to understand night time staffing levels, overnight procedures, and how security measures actually perform when the building runs on reduced management. An FRA conducted entirely during a Tuesday morning walk through will miss what actually happens at midnight on a Saturday.

We've worked with operators who scored well on their day time assessment but discovered significant gaps when we conducted **overnight evaluations**. The findings weren't dramatic. They were operational: doors held open, alarm systems in test mode that weren't restored, fire assembly points blocked by delivery vehicles. Small things. Routine things. But they compound into serious exposure when the building is full of sleeping guests.

Hotel fire safety operates on a simple principle: the measures that protect guests need to work at the moment they're needed, not just at the moment they're tested. A fire risk assessment for a hotel that doesn't account for this gap between tested conditions and real conditions isn't assessing the actual risk. It's assessing a performance.

Fire Risk Assessment for Hotel Acquisitions and New Openings

An FRA takes on a different purpose when you're acquiring a hotel or preparing for a new opening. It stops being a compliance exercise. It becomes a **due diligence tool**.

Pre-Acquisition

Before completing an acquisition, the acquiring operator needs to understand the **fire safety condition** of the building they're buying. The existing FRA, if one exists, reflects the previous operator's standards and may be years out of date. A **pre-acquisition fire safety audit** provides an independent baseline of the property's fire risk, identifies **remediation works** required, and gives the incoming operator a realistic view of **compliance costs** before handover.

There mediation cost question matters commercially. A hotel with ageing fire doors throughout, inadequate emergency lighting in back-of-house areas, and a **compartmentation deficiency** on two guest floors will need significant capital expenditure tobring to standard. Knowing that before exchange, rather than discovering it in the first month of operation, changes how the deal is structured. Operations directors who have been through this process more than once typically insist on an **independent FRA** as part of the transaction, not an optional extra.

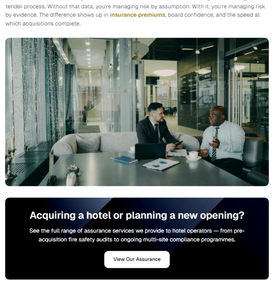
Pre-Opening Compliance

Pre-opening compliance is a related scenario. A hotel undergoing refurbishment or repurposing from another use needs an FRA to reflect the new operational model, not the previous one. The **means of escape** for a building that wasan office is not the means of escape for a building that will house sleeping guests. The assessment must be conducted against the **intended use**, not the historical one, and it must be complete before the first guest checks in.

Multi-Property Portfolio Consistency

For **hotel groups managing multiple properties**, the FRA programme needs a consistent methodology across the estate. A group operating 30 hotels across the UK will deal with different building ages, different construction types, and different local authority focus points. Without a **standardised approach** to **hotel fire safety assessment**, comparing risk across the portfolio becomes impossible. You end up with 30 individual reports that don't talk to each other, making itdifficult to prioritise **capital allocation** or identify systemic issues.

Independent assessment provides consistency that fragmented local approaches cannot. When one body assesses the entire estate to the same standard, the data becomes comparable. You can rank properties by risk. You can prioritise remediation programmes. You can see where the estate sits overall against current **regulatory expectations**. That visibility is what allows an operations director topresent a credible **fire risk position** to the board, to insurers, and toincoming clients during a tender process. Without that data, you're managing risk by assumption. With it, you're managing risk by evidence. The difference shows up in **insurance premiums**, board confidence, and the speed at which acquisitions complete.



Acquiring a hotel or planning a new opening?

See the full range of assurance services we provide to hotel operators — from pre-acquisition fire safety audits to ongoing multi-site compliance programmes.

View Our Assurance