

# Scottish Building Regulations – fire safety and compliance: call for evidence

## Scottish Government Consultation

To: All Chief Executives, Main Contacts and APSE Contacts in Scotland. For information only England, Northern Ireland and Wales.

### 1. Executive Summary

The Scottish Government are consulting on a review of building standards and guidance relating to fire safety. This consultation will help to shape and inform the review into the standards and processes set within [The Building \(Scotland\) Regulations 2004](#) and other published guidance documents to improve the provisions addressing fire safety.

Local authorities play a central role as verifiers within the building standards system and are therefore key stakeholders in this review. Any proposed changes are likely to have implications for local authority responsibilities, resourcing and workforce capacity.

Responses are due by **Friday 10<sup>th</sup> April 2026**.

[Click here](#) for further information and to submit your response.

### 2. Overview

The Scottish Government's call for evidence seeks to gather information and stakeholder views on how the current system is operating and where improvements may be required.

The consultation covers three main areas:

1. The [Grenfell Tower Inquiry Phase 2 Report](#) recommendations on fire safety, including a fundamental review of Section 2 (Fire) of the [Technical Handbooks](#)
2. The compliance plan manager
3. The compliance plan approach

The proposed review and changes aim to improve safety for the design and construction of all domestic and non-domestic buildings, making them safer for those in and around buildings, particularly relating to fire safety and in the event of an outbreak of a building fire when considering the Grenfell Tower Inquiry Phase 2 Report recommendations.

This work builds on lessons learned from the Grenfell Tower fire and aligns with wider developments across the UK, while recognising Scotland's distinct building standards system.

## Policy context and rationale

This call for evidence from the Scottish Government sits within a broader programme of building and fire safety reform following the Grenfell Tower fire, which highlighted significant weaknesses in building safety systems across the UK.

In Scotland, the review reflects a commitment to:

- Strengthen fire safety within building regulations
- Improve compliance and enforcement systems
- Enhance accountability across the building lifecycle, from design to occupation
- Ensure greater transparency and accessibility of safety information

The consultation also considers how to respond to recommendations from the [Grenfell Tower Inquiry Phase 2](#), alongside ongoing work to modernise Scotland's building standards system.

Overall, the aim is to improve safety for the design and construction of all domestic and non-domestic buildings, making them safer for those in and around buildings, particularly relating to fire safety in the event of an outbreak of a building fire when considering the Grenfell Tower Inquiry Phase 2 Report recommendations.

## Why local authorities should engage

Local authorities have a central role within Scotland's building standards system as verifiers responsible for ensuring compliance with building regulations. This consultation directly relates to how those responsibilities are exercised and may shape future expectations of local authority services.

Engagement is important because:

- Operational insight – Local authorities can provide practical evidence on how the current system works in practice, including challenges around compliance, inspection and enforcement.
- Resource implications – Proposed changes may affect staffing, skills and funding requirements within building standards teams.
- Regulatory role – Councils are key to delivering and strengthened compliance or enforcement policies.
- Cross-service impact – Fire safety intersects with housing, community safety and fire and rescue services, making this a wider issue for service delivery.

Early engagement at the consultation stage will help ensure that any reforms are realistic, deliverable and informed by frontline experience.

### 3. Consultation Questions

The consultation questions are categorised as follows:

Topic	Questions
A general call for evidence on any aspects of fire safety guidance that requires new guidance and/or clarification	2
Legal status of the technical handbooks (guidance)	3
Compartmentation, external fire spread and the “Stay Put” strategy	3
Rate of fire spread and means of escape for vulnerable and disabled people	3
Fire Strategy/Fire Safety Design Summary	2
Membership of the expert review group	2
Regulating the profession of fire engineering	1
Simple omissions and issues for example outdated references that could maybe be resolved with early revisions	1
The role of the Compliance Plan Manager in legislation	2
Procedural Principles of the Compliance Plan Approach	3
Compliance Plan: Pre-warrant Stage	2
Compliance Plan: Re-inspection of non-compliant work	1

The consultation questions are available in full below:

#### **A general call for evidence on any aspects of fire safety guidance that requires new guidance and/or clarification**

1(a) Are there existing fire safety topics and guidance within the technical handbooks that should be reviewed?

1(b) What new fire safety topics should be included in the Technical Handbooks?

#### **Legal status of the technical handbooks (guidance)**

2(a) Are the current mandatory standards and supporting guidance robust, effective and clearly understood to deliver the intended safety outcomes?

2(b) Are the mandatory standards and supporting guidance consistently applied to deliver the intended safety outcomes?

2(c) Where should improvements be focussed when reviewing the mandatory standards and supporting guidance?

### **Compartmentation, external fire spread and the “Stay Put” strategy**

3(a) Provide comments on risks with compartmentation in retrofit work (conversions) and the mitigation of these which may impact a Stay Put approach.

3(b) Provide comments on risks with vertical fire spread on external walls breaching compartmentation which may impact a Stay Put approach.

4 Do you consider current guidance on ‘evacuation on alert’ and evacuation alert systems to be effective and up to date?

### **Rate of fire spread and means of escape for vulnerable and disabled people**

5(a) Do you consider current guidance on escape for vulnerable and disabled people to be effective and up to date?

5(b) Is the current guidance easy to understand and consistently applied?

5(c) What improvements or changes are needed in this area?

### **Fire Strategy/Fire Safety Design Summary**

6(a) Is the current guidance for fire strategies and fire safety design summaries effective and up to date?

6(b) Is the current guidance easy to understand and consistently applied?

### **Membership of the expert review group**

7(a) Do the fire safety working groups have suitable representation and inclusion from across industry and the wider fire sector?

7(b) Do the fire safety working groups communicate their findings effectively?

### **Regulating the profession of fire engineering**

8 Do you have any views or comments on the regulating of the fire engineering profession?

**Simple omissions and issues for example outdated references that could maybe be resolved with early revisions**

9 Do you think there is a need for any other revisions of the technical handbooks and guidance (Section 2 Fire)?

### **The role of the Compliance Plan Manager in legislation**

10(a) Do you agree that the Compliance Plan Manager role requires duties and that corresponding offences should be set out in legislation?

10(b) Do you agree that local authority verifiers should be notified if the Relevant Person or their delegates do not act in accordance with the Building (Scotland) Act 2003 and the supporting secondary legislation?

### **Procedural Principles of the Compliance Plan Approach**

11 Do you agree that non-domestic buildings with any storey at a height of more than 11 metres above the ground should be defined as a High Risk Building?

12 Do you agree that enclosed shopping centres should be defined as a High Risk Building?

13 Do you agree entertainment venues such as theatres, concert halls and arenas should be defined as a High Risk Building?

### **Compliance Plan: Pre-warrant Stage**

14(a) Do you agree with the proposed minimum 12-week timescale for submission to a verifier of an Application for Compliance Plan in Principle for a High Risk Building?

14(b) Do you agree that a verifier should only register a building warrant for a High Risk Building after a Compliance Plan in Principle has been issued?

### **Compliance Plan: Re-inspection of non-compliant work**

15 Should projects that request a site visit without first ensuring compliance through their own checks pay an extra, reasonable fee for reinspection?

16 Do you agree that legislation is required to give full effect to the Compliance Plan Approach and role of the Compliance Plan Manager for High Risk Buildings?

## 4. APSE Comment

APSE encourages our members in Scotland to engage with this consultation and provide evidence based on their operational experience of building standards, compliance and fire safety.

Fire safety remains a critical issue for local authorities. Following the building fire near Glasgow Central Station in March 2026, [BBC News reported](#) on the concerning frequency of building fires in Scotland. Figures obtained from the Scottish Fire and Rescue Service identified Glasgow City (10,321), Edinburgh (6,319), North Lanarkshire (3,660), Fife (3,371) and Aberdeen City (3,293) as the five council areas with the most building fires between 2016 and 2025.

Furthermore, local authorities verify thousands of building warrant applications each year across a diverse built environment, alongside wider responsibilities for housing and community safety. Ensuring that regulatory systems are effective, proportionate and properly resourced is therefore essential in protecting communities.

Discussions on the way forward with all changes to building maintenance and the sharing of best practice takes place in APSE Scotland's Housing, Construction and Building Maintenance Network. Network meetings are free to attend for APSE members. The Network has continued to discuss and share learnings from the tragedy of the Grenfell fire and heard from the Scottish Fire and Rescue Service regarding [Fire Safety Post Grenfell](#) and Fife Council have also provided a presentation to colleagues in relation to their [fire safety doors](#) and the rigorous testing regime. Previous presentations on the Networks are available online [here](#) and upcoming meetings are listed [here](#).

**David Hinds,**  
**Research and Information Officer**  
[dhinds@apse.org.uk](mailto:dhinds@apse.org.uk)

**Louise Melville,**  
**Principal Advisor (Scotland)**  
[lmelville@apse.org.uk](mailto:lmelville@apse.org.uk)

## Sign up for APSE membership to enjoy a whole range of benefits

APSE member authorities have access to a range of membership resources to assist in delivering council services. This includes our regular networks, specifically designed to bring together elected members, directors, managers and heads of service, together with trade union representatives to discuss service specific issues, innovation and new ways of delivering continuous improvement. The networks are an excellent forum for sharing ideas and discussing topical service issues with colleagues from other councils throughout the UK.

Networks are a free service included as part of your authority's membership of APSE and all end with an informal lunch to facilitate networking with peers in other councils. If you do not currently receive details about APSE network meetings and would like to be added to our list of our contacts for your service area please email [enquiries@apse.org.uk](mailto:enquiries@apse.org.uk)

Our national networks include:

- FM and Building cleaning
- Catering (School Meals)
- Cemeteries and Crematoria
- Local Government Reorganisation Network
- Highways and Street Lighting
- Housing, Construction and Building Maintenance
- Local Authority Social Value, Procurement and Commercialisation
- Parks, Horticulture and Ground Maintenance
- Recovery and Renewal
- Renewables and Climate Change
- Roads, highways and street lighting
- Sports and Leisure Management
- Vehicle Maintenance and Transport
- Waste Management, Refuse Collection and Street Cleansing
- Armed Forces and Veterans Network

Visit [www.apse.org.uk](http://www.apse.org.uk) for more detail



Association for Public Service Excellence  
3rd floor, Trafford House, Chester Road,  
Manchester M32 0RS. telephone: 0161  
772 1810 fax: 0161 772 1811 web:  
[www.apse.org.uk](http://www.apse.org.uk)