

WYRE FOREST DISTRICT COUNCIL
HOUSES IN MULTIPLE OCCUPATION POLICY

1.0 BACKGROUND

- 1.1 This Policy responds to the new legislation on Houses in Multiple Occupation (HMO) and sets the policy for licensing under the Housing Act 2004. Further this Policy and HMO Licensing replaces the existing registration scheme.
- 1.2 House in Multiple Occupation is defined as *'a house which is occupied by persons who do not form a single household and who share one or more facilities'*, typical dwellings include shared houses, bedsits and hostels. The exact definition is described by standard tests detailed in S.254 Housing Act 2004.
- 1.3 The risk to health and risk of death and injury from fire is greatly increased in this type of dwelling and persons who live in such properties tend to be more vulnerable than persons in other types of accommodation. The Government has therefore introduced a mandatory licensing scheme for certain types of HMO and has also introduced standards specific to these properties over and above those expected of normal rented dwellings.
- 1.4 We aim to ensure that the occupiers of Houses in Multiple Occupation live in safe and healthy homes by providing advice, education and where appropriate enforcing the relevant provisions of the Housing Acts. We are taking a proactive approach by actively identifying and inspecting HMO's in the district.
- 1.5 We recognise that good quality, well managed HMO's provide a valuable source of accommodation for many single people some of whom are unable to access any other type of housing.
- 1.6 A recent office based survey of potential HMO's revealed that Wyre Forest has at least 20 licensable properties and approximately 50 other HMO's that are of note. There are other properties that fall under the definition of HMO but are covered by other legislative provisions, for example care homes.

- 1.7 The survey also indicates that most of the HMO stock already has fire precautions in place and have had advice and information on relevant standards from the Council and the Fire Service.
- 1.8 The Government's decent homes targets places a responsibility on Local Authorities to ensure that 70% of private sector homes occupied by vulnerable residents meet the Decent Homes Standard. It is therefore essential that the vulnerable residents of HMO's are actively supported by the Council using the powers made available through the legislation and through discretionary financial assistance to improve standards where appropriate.
- 1.9 This policy works alongside the Housing Enforcement Policy and the Private Sector Housing Assistance Policy. This is in recognition that there is a balance between assistance and enforcement that needs to be considered in the methods used to improve or maintain standards.
- 1.10 The use of specific provisions relating to HMO's, for example licensing, is in addition to the enforcement powers under the Housing Act 2004, Housing, Health and Safety Rating System (HHSRS). This system for assessing properties identifies significant hazards, considers the risks associated with them and guides towards appropriate potential actions, including the use of formal notices to improve conditions or prohibit circumstances. Further details are contained in the Housing Enforcement Policy.
- 1.11 The Council actively liaises with the Hereford and Worcester Fire Service in considering appropriate fire precautions to require in particular properties. The Council also uses relevant British Standards and other guidance as models for standards where appropriate, for example British Standard 5839 Part 1 and Part 6, Fire Detection and Alarm Systems.

Related Policies:

- 1.12 This policy works alongside the Wyre Forest District Council Private Sector Housing Assistance Policy and the Housing Enforcement Policy.

Relevant Legislation and Regulations:

- 1.13 The Housing Act 2004
The Housing Act 1985
The Management of Houses in Multiple Occupation (England) Regulations 2006.
The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006.
The Selective Licensing of Houses (Specified Exemptions) (England) Order 2006.

The Licensing of Houses in Multiple Occupation (Prescribed Descriptions) (England) Order 2006.

2.0 IDENTIFICATION AND INSPECTION

- 2.1 Potential HMO premises are identified through Council records, housing surveys and from local information. The details of these properties are added to a premises database. Local Housing Authorities have powers to obtain information from benefit and tax records to assist with the functions under the Housing Act 2004.
- 2.2 Licensed HMOs will have certain details regarding the property and licence holder held on a public register, available upon request to the public and the Government who monitor the Council's activities in relation to HMOs through the Office of the Deputy Prime Minister (ODPM).
- 2.3 Details of the legislation regarding HMOs, the licensing scheme and landlord and tenant advice can be found on the ODPM website, www.odpm.gov.uk
- 2.4 Following identification or as part of the scheduled routine inspection under the licensing system, HMOs shall be inspected in accordance with the Health and Housing Safety Rating System set out in the Housing Act 2004 and assessed for compliance with standards set out in regulations made under the Act. Notification of any required improvements will be issued to the owner or person responsible.
- 2.5 Lower risk properties based upon an assessment of fire risk and occupation, will not be subject to routine inspection if they meet the required standards. Other inspections shall be considered and planned on a risk based approach.

3.0 HMO LICENSING

- 3.1 HMO dwellings that comprise three or more storeys with five or more occupants and where one or more facility is shared will be subject to mandatory licensing. Persons who fail to licence premises or fail to comply with licence conditions commit an offence. Licences will be valid for five years, providing all the relevant conditions are met. The licence may not be transferred to another person.
- 3.2 The legal description of what constitutes a licensable House in Multiple Occupation is detailed in an order made under the Housing Act 2004 entitled: *The Licensing of Houses in Multiple Occupation (Prescribed Descriptions) (England) Order 2006*.

- 3.3 Offences and appeals under these provisions will be heard by a Residential Property Tribunal (RPT) who can judge cases relating to offences make fines and order the repayment of up to twelve months rent back to tenants and in the case of Housing Benefit back to the Council.
- 3.4 Applications for a HMO Licence must be made to Wyre Forest District Council in writing on the requisite form. The Council may vary or revoke a licence in accordance with the Housing Act 2004 S.69.
- 3.5 Licenses may be granted when the Council is satisfied that the house:
- i) is reasonably suitable for occupation,
 - ii) has adequate management arrangements,
 - iii) the proposed licence holder and/or manager is a fit and proper person.
- 3.6 In deciding if the house is reasonably suitable for occupation the Council shall have regard for the number of persons occupying the dwelling and whether the property complies with statutory and local prescribed standards for fire safety, overcrowding and the provision of amenities.
- 3.7 In deciding if the house has adequate management arrangements the Council shall have regard for the system in place for collecting rents, undertaking repairs, and controlling anti-social behaviour.
- 3.8 In deciding that the licence holder and/or manager is a fit and proper person the Council shall in particular have regard to whether that person:
- i) is appropriate and competent to carry out that function.
 - ii) has committed any offence involving fraud or other dishonesty, or violence or drugs, or any offence listed in Schedule 3 to the Sexual Offences Act 2003.
 - iii) has practised unlawful discrimination on grounds of sex, colour, race, ethnic or national origins or disability in, or in connection with, the carrying on of any business.
 - iv) has contravened any provision of the law relating to housing or of landlord and tenant law;
 - v) has acted otherwise than in accordance with any applicable code of practice approved under section 233 Housing Act 2004.
- 3.9 Applicants are required to provide a criminal records bureau disclosure or other form of personal check together with their application.

Licence Fee

- 3.10 The Council is able to charge a reasonable fee to cover costs associated with the licensing scheme. The fee has therefore been determined taking into account the various administrative, inspection, assessment and liaison costs involved over the 5 year period. The fee is £500. There will however be a reduction to only £300 if the application provided is full and satisfactory given that this will reduce costs for the authority.

Enforcement Charges

- 3.11 Distinct from the licensing fee, should separate enforcement action be needed, a charge of £50 will be incurred for an inspection and report where contraventions are identified. In addition any investigation costs will also be charged, for example specialist contractors used for gas and electric assessment. The Licence fee includes for one inspection and report in the 5 year licence period.
- 3.12 The above fees and charges will apply from April 2006 and be reviewed annually.

Temporary Exemption

- 3.13 An owner or manager of a HMO may apply to the Authority for a Temporary Exemption Notice (TEN). If a TEN is granted the HMO is exempt from licensing and accordingly the owner or manager does not commit the offence of operating an HMO without a licence. A TEN can only be granted for a maximum period of three months, but in exceptional circumstances the Authority may issue a second TEN. Temporary exemption from licensing may be granted to landlords that wish to change the use of a dwelling to that other than a HMO.

Selective/Additional Licensing

- 3.14 The Housing Act 2004 and regulations made thereunder make provision for additional or selective licensing. This means that other HMOs and rented accommodation can be brought into a licensing scheme. However this can only be done in certain very limited circumstances through the approval of the Secretary of State and when demonstrated that a significant impact would be made upon anti-social behaviour for example. The current circumstances in the District do not warrant and would not therefore be successful in an application for selective/additional licensing. This situation will be kept under review. It is anticipated that the

Government may extend the scope of licensing in due course following a review of the scheme. Any further developments will be reported upon and this Policy considered for amendment.

Licence Procedures and Appeals (Schedule 5 Housing Act 2004)

- 3.15 The applicant or any relevant person may appeal to a Residential Property Tribunal against a decision made by the Local Housing Authority to refuse to grant the licence, or to grant the licence, (in relation to licence conditions) to vary or revoke a licence, or to refuse to vary or revoke a licence.
- 3.16 Appeals must usually be made within 28 days from the notification of decision. The Residential Property Tribunal may allow a late appeal if it is satisfied that there is good reason for the failure to appeal before the end of that period.

Licence Conditions

- 3.17 A licence may include such conditions, as the Council considers appropriate for management use and occupation of the house. Any required improvement, alteration or repairs to the house such as structural works or installation of fire detection system will be enforced separately but must be satisfactorily completed within the first licence period.
- 3.18 All licences will require at least the national minimum standards set out in regulations under the Housing Act 2004. These regulations are:
1. The Management of Houses in Multiple Occupation (England) Regulations 2006.
 2. The Licensing and Management of Houses in Multiple Occupation and other Houses (Miscellaneous Provisions) (England) Regulations 2006.

Additional Licence Conditions

- 3.19 In addition to the standards set out in the above regulations, the Council also specifically requires the annual submission of the following:
1. Copies of safety certificates, details of occupation, works carried out in the past 12 months and works planned for the coming 12 months.
 2. A copy of the building insurance certificate.
 3. Copies of the fire precautions maintenance records and safety certificate.

4. Copies of any new tenancy agreements
5. Any amended or new details for the landlord, manager, emergency contact, key competent contractors used.

4.0 **STANDARD FIRE PRECAUTION REQUIREMENTS FOR HOUSES IN MULTIPLE OCCUPATION**

Fire Detection and Warning System

- 4.1 The purpose of the alarm system is to alert occupants and enable them to move to a place of safety whilst the escape routes are clear of smoke. An assessment of the fire risks must be undertaken to identify the precautions required at the property. In buildings that are considered high risk or those that have a complicated layout consultation with the fire officer may be required.

Standard Installations

- 4.2 Two storey dwellings - interlinked domestic type smoke and heat detection, incorporating battery back up, hush buttons and hardwired in the 240volt mains electrical supply all in accordance with BS5446 and BS 5839 part 6 grade D.
- 4.3 Three and four storey dwellings with half-hour resistant construction - fire detection and alarm system incorporating call points, sounders, smoke and heat detection. The design of the system to be in accordance with current British Standard 5839: Part 1 Type L2 and should include a two stage pre-alarm.
- 4.4 Three and four storey dwellings with one hour resistant construction (purpose built flats and flats converted with benefit of Building Regulation approval after 1992) - fire detection and alarm system incorporating call points, sounders, smoke and heat detection to escape routes and lobby of each dwelling British Standard 5839: Part 1 Type L2/L3. Together with an interlinked domestic type system within all flats to BS 5839 part 6 grade D.
- 4.5 Mixed occupation dwellings may require a variation to the British Standard whereby all the rented accommodation is protected by an L2 system and the owner occupied areas are protected by a domestic type system. Owners should be made aware of the benefits of being included on a whole property system.

System Requirements

- 4.6 Should at any time the alarm system be inoperable a temporary warning system such as battery operated alarms must be provided. The Landlord or responsible person should have in place a maintenance system to resolve alarm system faults within 8 hours from discovery.
- 4.7 The alarm should be loud enough to wake everyone in the dwelling, a minimum sound level of 75dB(A) should be achieved at the bed head and 65dB(A) in all other areas. Occupiers with hearing difficulties should be provided with a proprietary warning device.
- 4.8 The use of radio transmitter type systems will only be accepted following a manufacturers site survey to establish suitability and submission of an agreed maintenance program.
- 4.9 Following installation Landlords, responsible tenants and agents must be trained in the use and testing of the system and a log of system maintenance must be kept.

Type	Alarm Type	Emergency Lighting	Call Points	Fire Doors
Two storey 5 or less occupants (none vulnerable)	BS5839 part 6 LD2 grade D system with BS5446 interlinked detectors, smoke to escape routes and heat in kitchens.	No	No	Kitchen
Two storey 6 or more occupants	BS5839 part 6 LD2 grade D system with BS5446 interlinked detectors, smoke to escape routes and heat in kitchens, additional smoke detection in bedrooms may be required.	No	No	Kitchen and bedrooms

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Three and four storey with shared facilities	BS 5839: Part 1 Type L2 (or Part 6 LD1/2 grade A system) to escape route common areas kitchens and bedrooms.	Yes	Yes	Above plus all doors to risk rooms on escape routes.
Three and four storey self contained flats (poorly converted)	BS 5839: Part 1 Type L2 to escape route common areas kitchens and bedrooms. (BS 5839 part 6 grade D interlinked detectors within some flats may be used).	Yes	Yes	All main entrance doors plus all doors to risk rooms on escape routes.
Purpose built flats with one hour fire resistant construction. Flat in multi occupation.	BS 5839: Part 1 Type L3 to escape route and lobbies. Within flats system designed to BS 5839 part 6 grade D.	Yes	Yes	All main entrance doors plus all doors to risk rooms on escape routes.

Emergency and Escape Lighting

- 4.10 Escape lighting is the normal natural or artificial lighting normally used to aid safe escape. The normal lighting should provide suitable levels of light together with accessible switches with sufficient time delay to allow safe egress.
- 4.11 Emergency lighting operates automatically when the normal lighting fails in order to aid safe escape. Luminaries to be minimum 1 hour maintained (on all the time) or non-maintained (activate on failure of normal lighting) units and conform to BS 5266: Part 1. Units can be standalone or be incorporated into normal light fittings, units to be mains charged with integral battery.
- 4.12 The requirements for emergency lighting should take into consideration the complexity of escape route, the size of the dwelling and the risk to occupiers. Other issues such as borrowed light have a bearing on the siting and number of emergency lights.

- 4.13 The emergency lighting system should be designed to cover escape routes, exits, corridors, stairway enclosures and changes in floor level and direction. One or two units may be sufficient for small dwellings with a straightforward escape route larger dwellings will require the input of a design engineer and the Fire Officer.

Fire Doors

- 4.14 Fire door assemblies are required in doorway openings in fire resisting construction and for the protection escape of routes.
- 4.15 Doors on escape routes and to risk rooms to be certified 1/2 hour fire resisting (FD30s/E30/BWF) and hung with three 1/2 hour fire rated hinges with a maximum gap of 4mm between the door and frame. The doorframe must be either certified 1/2 hour fire resisting or of substantial construction fitted tight and securely to supporting walls.
- 4.16 All fire doors must incorporate intumescent heat and smoke seals to jambs and door head, seals to comply with BS EN 1634, BS 476-22 or BWF certified. All fire doors (except those to lockable cupboards and voids) to be maintained effectively self closing by a certified 1/2 hour fire rated self-closing device that will effectively fully close the door from any angle, closing devices to comply with BS EN 1154 or BS EN 1634-2.
- 4.17 Doors to be installed so that they are close fitting all round but remain readily operable by the occupants. Door locks must be readily operable from inside rooms without the use of a key. Fire door letterbox openings to be lined with proprietary intumescent seal. Specialist and electrical door closing systems to be approved by the local Fire Authority.

Fire Fighting Equipment

- 4.18 In kitchens provide a 1m x 1m, BS EN 1869 1997 compliant, fire blanket and a suitably located 1kg ABC, BS EN 3:1996 compliant, type dry powder extinguisher.
- 4.19 In circulation areas provide a 13A rated 9ltr pressure water extinguisher, BS EN 3:1996 compliant, for each 200m² floor area or 1 extinguisher on each floor.
- 4.20 Site fire fighting equipment close to fire risks in a conspicuous position but without causing an obstruction, heavy extinguishers to be hung 1 metre from floor level and lighter extinguishers 1.5metres from floor level, or at a level to suit the occupant.

- 4.21 Fire fighting equipment should be visually checked weekly for correct siting and faults, a full engineer service to be undertaken annually and recorded on maintenance tags.

Inspection and Testing

- 4.22 All apparatus and devices provided for fire safety must be maintained in working order. The landlord must ensure that they (or a responsible person) undertake regular inspections and servicing is undertaken and any defects rectified immediately.
- 4.23 It is good practice to test the alarm system at the same time each week and to test different detectors or call points each time, merely testing the sounders from the panel is not sufficient. All tests should be recorded in a log for the property, available to residents and enforcement officers.
- 4.24 Daily Checks by Occupiers
- ensure escape route is kept clear
 - check fire alarm panel
 - record any false alarms
 - check log book
- 4.25 Weekly tests by Manager/Landlord
- test fire alarm by operating a manual call point (alternate each week)
 - check sounder audibility
 - check extinguishers and fire blankets
 - log actions
 - check log book
- 4.26 Monthly tests
- energise and test emergency lights
 - visual check of alarm system batteries
 - check all fire doors
- 4.27 Annual test
- undertake full service and test by fire safety engineer, provide test certificate for alarm system including tests of all call points, detector heads and sounders, emergency lighting (discharge test) and fire fighting equipment.

Signage and Notices

- 4.28 A sign with the words *'Fire Door Keep Shut'* should be displayed on any fire doors likely to be left open.
- 4.29 A sign with the words *'Fire Door Keep Locked'* should be displayed on doors to cupboards and meters.
- 4.30 A sign with the words *'Fire escape Keep Clear'* should be displayed on doors on the escape route.
- 4.31 Additional illuminated directional signage should be provided where the escape route is complicated or difficult to locate. In larger HMO premises fire action notices should be displayed on escape routes.

5. HMO AMENITY AND SPACE STANDARDS

- 5.1 These standards are distinct from any overcrowding standard that exists or may be introduced under Housing legislation.

Bedrooms

- 5.2 Floor areas for bedrooms (rooms used for sleeping) are listed below, rooms must have adequate ceiling height of minimum 2.1m and be of adequate size and shape to accommodate necessary furniture and facilities. The minimum size for a bedroom to be let to an adult is 6.5 m² (70 sq. feet) but in all cases rooms must be safe and fit for their purpose.

	Separate kitchen, bathroom and lounge	Separate kitchen bathroom, no lounge	Rooms with kitchen facilities
Single Room	6.5 m ²	8 m ²	11 m ²
Double Room	10 m ²	12 m ²	14 m ²

- 5.3 No two persons of the opposite sex, aged 11 or more, shall share a bedroom unless they are both adults who are married or co-habiting.

- 5.4 All bedrooms must have a glazed window to the open air not less than 10% of the floor area with at least one opening casement. The walls floor and ceiling must be of permanent construction with solid door entrance, occupation of other parts of the house for sleeping purposes is not permitted. Each bedroom to have a minimum of one switched light and two power socket outlets.

Kitchens

- 5.5 One kitchen to be provided per 5 adult occupiers or a separate kitchen within individual units.
- 5.6 Larger communal kitchens must provide equivalent sufficient amenities. Kitchens to be available for the exclusive use of the house occupants and be located no more than two floors distant from users bedrooms.
- 5.7 All surfaces to be readily cleansable with splash back to be provided at sinks. Floor covering to be non-slip and readily cleansable.
- 5.8 A suitable sized sink and drainer supplied with mains pressure cold water and piped hot water. Wash hand basins are not acceptable in place of sinks.
- 5.9 A suitable sized cooking appliance located in such a position so that its use is unobstructed. Bedsit rooms with individual kitchens may be provided with a two-ring hob and oven, for up to two people. A minimum of a four-ring hob, one oven and one grill is considered suitable for up to five persons.
- 5.10 Provide within the kitchen impervious worktop of suitable size for the preparation of food and a suitable number and volume of storage units and a suitably sized fridge and freezer.
- 5.11 Provide within the kitchen a 150mm electrical extractor fan or a glazed window, to the open air, not less than 10% of the floor area with at least one opening casement. In addition permanent ventilation to be provided and connected where a tumble dryer is provided.
- 5.12 Kitchen areas to have a suitable number of lights and power outlets with a minimum of one switched light and three twin power socket outlets.

Bathroom and WC

- 5.13 Bathrooms and WC's to be available for the exclusive use of the house occupants.
- 5.14 Provide one proprietary bath or shower with permanent piped supply of hot and cold water per five occupants, not located more than 20m travel distance, from bedrooms.
- 5.15 Bathrooms to be of adequate size to allow for drying and changing.
- 5.16 Provide within each bathroom a 100mm electrical extractor fan or a glazed window, to the open air, not less than 10% of the floor area with at least one opening casement.
- 5.17 Provide one WC per five occupants, not located more than 20m-travel distance from bedroom, and wash hand basin with permanent piped supply of hot and cold water.
- 5.18 Floor covering to WC's and bathrooms to be non-slip and readily cleansable.
- 5.19 Each bathroom to have one pull cord switched light, power outlets are not permitted.
- 5.20 External WC's and bathrooms are not permitted.
- 5.21 Windows to bathrooms and WC's shall consist of obscure glazing.

6. HEATING AND INSULATION

- 6.1 All void roof spaces to be insulated to a minimum of 250mm-thickness mineral wool or equivalent. Cavity walls to be insulated with mineral wool cavity slab, thermal insulation board, blown mineral wool or polystyrene beads. Sloping ceilings to habitable rooms to be insulated with blown mineral wool or thermal insulation board.
- 6.2 A system of suitable and sufficient heating to be provided to all rooms and circulation areas. The system shall be capable of heating rooms to 18 o centigrade when the outside temperature is -1 o centigrade. Heating systems to comprise of either an energy efficient wet system with radiators or energy efficient storage heaters.

- 6.3 Electrical heaters such as fans and convector heaters can be used in small rooms such as WC's but must be splash proof and permanently fixed in a suitable safe location.

7. FURNITURE AND APPLIANCES

- 7.1 All furniture in the house whether supplied by the Landlord or otherwise must be in clean condition and good repair, divan bases and mattresses must comply with BS 7177 and other soft furnishings with Furniture and Furnishing (Fire Safety) Regulations 1988.
- 7.2 All non-fixed electrical appliances in the house must be properly wired with a three-pin plug and routinely inspected for damage or faults.

8. MANAGEMENT

- 8.1 A reliable system of management shall be in place to ensure the repair, cleansing and maintenance of kitchens, bathrooms, WC's, circulation areas, staircases and outbuildings.
- 8.2 All means of escape from fire in the house and all fire safety installations and fire fighting equipment are in and are maintained in good order and repair and are kept free from obstruction at all times.
- 8.3 Commission a competent engineer to undertake an annual service of fire alarm systems, emergency lighting and fire fighting equipment and provide annual safety certificate.

General Requirements

- 8.4 Ensure that services including the supply of hot and cold water, gas, electricity, heating and lighting are maintained in good order and repair.
- 8.5 Keep electrical appliances and furniture in a safe condition. Commission an approved contractor to undertake a fixed electrical safety check every five years.
- 8.6 Commission a competent engineer to undertake an annual service of all oil or gas (if any) appliances in the building. Forward a copy of the annual safety certificate, for each appliance, to the Council. (OFTEC oil) (CORGI gas)

- 8.7 Commission an inspection by NICEIC or other approved engineer on the fixed electrical wiring system every five years, provide a safety test certificate for compliance with wiring regulations BS 7671:2001.
- 8.8 All circulation and common areas including shared amenities, passageways, yards and staircases shall be adequately lit by switched electrical lights.
- 8.9 Provide suitable and adequate refuse receptacles and ensure suitable arrangements are made for proper collection of refuse. The manager shall ensure that refuse and litter from the house are not allowed to accumulate in or around the property.
- 8.10 The manager shall provide a suitable system for occupiers to notify problems, repairs and contact details in case of emergencies.

9.0 ENFORCEMENT AND ADVICE

- 9.1 The main emphasis of our enforcement role will be based on education, and advice. This will be made available through information leaflets, the Council website and direct advice available over the telephone or in person from the Private Sector Housing Team and the local Fire Officer.
- 9.2 We shall also provide financial assistance, through the Private Sector Housing Assistance Policy, for works to bring the property up to the Decent Homes Standard where this is above and beyond statutory legal requirements.
- 9.3 Where Landlords are not co-operative in achieving the statutory standards we shall, where appropriate, take formal action under the relevant provisions contained in the Housing Acts.

10.0 AREAS OF ENFORCEMENT

- 10.1 The Housing Act 2004 provides under the HHSRS facilities for improving fire safety in any domestic dwelling including houses, flats and HMO's.
- 10.2 The Hereford & Worcester Fire and Rescue Service provide consultation and technical support for fire safety in HMO's.
- 10.3 Fire Authorities also have powers under The Regulatory Reform (Fire Safety) Order 2005 and although this does not apply to private dwellings it

can be used for common areas in HMO's, purpose built flats and workplace accommodation.

5.4.06