



Property and Housing Services

**Fire Safety policy  
(2025)**

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# **1. Introduction**

## **1.1 Purpose of this policy**

The London Borough of Havering considers the safety of its residents to be of paramount importance.

Whilst fire safety has always been considered as a core part of our approach to safety, the terrible events at the Grenfell Tower has refocussed attention on fire safety in and around our resident homes and will lead to additional obligations for landlords and tenants.

This fire safety policy intends to provide a structured approach, which identifies the key points required to achieve suitable arrangements for managing fire safety in properties owned and managed by the London Borough of Havering.

The Building Safety Act (2022) brings a clear approach to sanctions including defining non-compliance with the Act and making non-compliance a criminal offence.

## **1.2 Aims of this policy**

This policy is supported by the Housing Fire Safety Management plan which sets out the key processes in managing fire risk, including providing an appropriate matrix to assess risk, relevant processes to manage surveys, resurveys and incidents and details our core standards.

This policy sets out our core corporate principles which should be adopted over the longer term, whereas the management plan is the operational document which supports staff in complying with this policy and is therefore subject to more regular change. We will keep our buildings safe throughout their lifecycle, from design through to maintenance in-use.

We will also address legacy deficiencies in a reasonably practicable timescale through strategic upgrade and refurbishment, prioritising works according to the level of risk they pose, and the Council's ability to address them. As part of this commitment, we will ensure that our staff have the necessary competence, systems and support to facilitate management of fire-safe buildings.

We will implement systems for managing all aspects of fire safety and will keep all our systems and processes under review to ensure that they remain fit-for-purpose and are dynamic and adaptive to change where needed.

We will co-operate, co-ordinate and actively collaborate with all third-parties and enforcing authorities, fostering a culture of trust and transparency.

### 1.3 Scope of this policy

This policy relates to all domestic properties in the HRA, all communal areas linked to those properties, all garage and garage sites in the HRA, all land within the HRA, all Hostels and domestic houses of multiple occupation (HMOs) and Private Sector Leased Properties which are managed by LBH Housing department and in which we place residents.

This policy also relates to all new build properties or newly acquired homes to be owned and managed by the HRA.

It sits alongside and supports the Housing Asset Management Strategy and where this policy is silent on any principles then relevant legislations is applied.

This policy sets out LBH core principles in regards to;

- Ensuring stakeholders at all levels within the organisation understand their roles and responsibilities in regards to fire safety.
- Ensure a clear operational management plan is in place which set out our operational approach to fire safety.
- Ensure that as a minimum we meet all of the requirements of the Building Regulations and Fire Safety Act.
- Making sure adequate resources are provided to provide guidance and other fire safety measures required by the Fire Safety Order 2005 and the Housing Act 2004, relating to fire safety, including Building Regulations, and support with help from specialists, where necessary.
- Ensure coordination and cooperating with other occupiers, for example leaseholders, PSL landlords, commercial property leaseholders (shops below flats), TMO and other stakeholders on issue of fire safety.
- Engaging with residents to communicate vital fire safety messages, including fire safety inspections within dwellings using a variety of media such as residents' handbooks, websites and other social media platforms.
- Providing suitable training to ensure all relevant staff and others visiting residential properties have sufficient fire safety awareness.
- Ensuring that residents and staff remain aware of the relevant fire procedures, and ensure that they are implemented.
- Ensuring the best decisions are taken for residents, including considering the sustainability and lifecycles of our homes.
- Have a clear approach to charging leaseholder for fire safety related works in their properties.
- Approaches to liaising with regulatory bodies including the new Building Safety Regulator, the London Fire Brigade (LFB) and other local government departments to ensure a uniform approach to fire safety is adapted.
- Ensuring third parties working in and around our properties take full consideration of fire safety and adhere to all relevant legislation.
- Ensure all new build homes, or newly acquired homes owned or managed by LBH conform to all relevant legislation, LBH policy and management plan.

- Ensure our policy and management plan is reviewed at appropriate intervals.

## 1.4 Legal context of this policy

This policy operates in the context of the following legislation and Codes of Practice:

- Regulatory Reform (Fire Safety) Order 2005
- Building Safety Act (2022) - applicable to buildings of five stories or 11 metres, as well as six stories or 18 metres and above
- Building Regulations and approved documents
- Housing Act
- Defective premise Act
- Local Authorities Coordinators of Regulatory Services
- Housing Health and Safety Rating System

This policy should be read in conjunction with your tenancy agreement which is the core document which sets out the obligations and duties of both Havering Council and its tenants.

## 2. Roles and Responsibilities

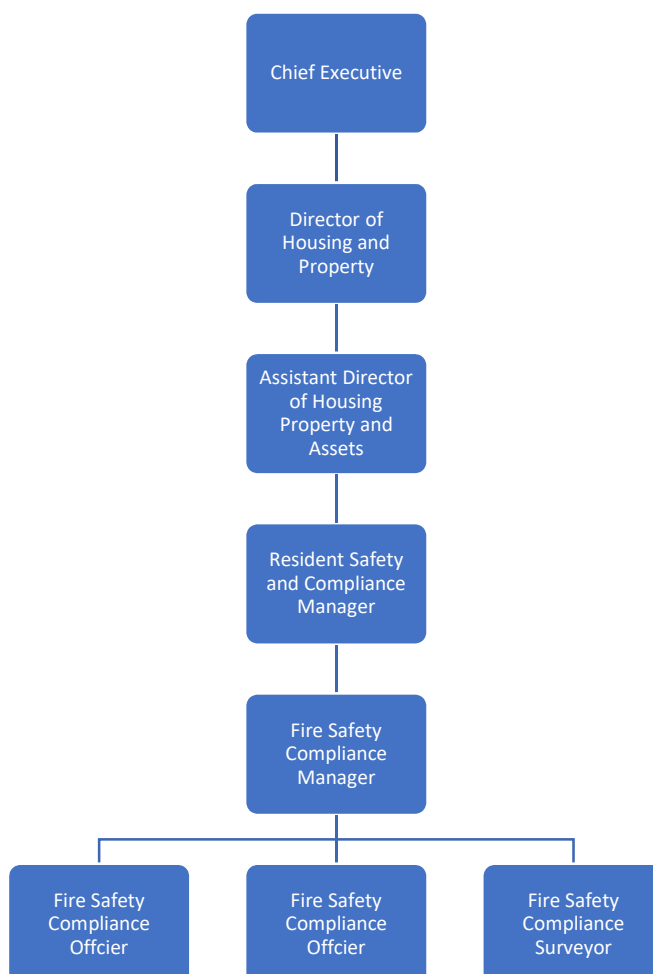
|                               |   |
|-------------------------------|---|
| Accountable Person:           | Chief Executive, Havering Council               |
| Duty Holder:                  | Director of Housing and Property                |
| Assistant Duty Holder:        | Assistant Director of Housing Property & Assets |
| Responsible Person:           | Resident Safety & Compliance Manager            |
| Assistant Responsible Person: | Fire Safety Compliance Manager                  |

### 2.1 Explicit Duties

| Stakeholder        | Duty   |
|--------------------|--|
| Accountable Person | Legally responsible for ensuring the structural and fire risk are understood for each building and ensuring those risk are adequately managed so the building can be safely occupied.<br>They can delegate duties  |
| Duty Holder        | Undertake all functions delegated by the accountable person.<br>Oversee all fire safety activity and put in place a rigorous assurance approach.<br>Ensure adequate resource (Staff and financial) to deliver the FSMP.<br>Approve changes to the FSMPs.<br>Determined the appropriate resident engagement strategy. |

|                       |  |
|-----------------------|--|
|                       | Oversee reporting to regulatory bodies, the Building Safety Regulator and London Fire Brigade.   |
| Assistant Duty Holder | Support and deputise for the Duty holder as required.  |
| Responsible Person    | Manage day to day operation FRA programme and associated works.<br>Ensure policy and FSMP are adhered to.<br>Determine relevant training programmes for stakeholder and ensure they are implemented.<br>Update Duty holder on relevant changes to legislation.<br>Manages contractors and surveyors undertaking fire safety works.<br>Provide expert advice to other teams undertaking works.<br>Report any non-compliance to the duty holder. |
| All Housing Staff     | To ensure the FSMP is enforced.<br>To ensure fire safety is considered as part of any projects.  |
| All Staff             | To report any areas of concern within an appropriate timescale.  |

## 2.2 Structure Chart



The accountable person can be an individual or organisation whose principal role is to support the Compliance team in the day-to-day management of fire and structural safety in the building.

The Compliance team will manage the following actions:

- Complying with their own statutory duties as set out in the Act;
- Managing the building in accordance with the Safety Case Report for the building and ensuring that the requirements of the Building Assurance Certificate are complied with;
- Keeping informed and co-operating with the managing agents (if any) of the building (if different) about safety measures and works;
- Complying with all directions given and statutory notices issued by the Building Safety Regulator;
- Co-operating with other occupiers or owners of the building, including any other person acting as the Responsible Person under the Fire Safety Order, to secure an integrated approach to managing building safety risks.
- Maintain the Building Safety Case File
- Engage with residents on all fire related matters and implement a resident engagement strategy
- Ensure competence to those involved in the maintenance of the building

### **3. Resource**

LBH will ensure that it continues to engage a dedicated Fire Safety team to manage all aspect of surveying and works. As a minimum, this will consist of an experienced fire safety manager and may include the use of external consultants.

### **4. Surveys and Works**

We will ensure all multiple occupancy properties will have an up to date fire risk assessment undertaken by a suitably qualified assessor.

All FRAs will include an assessment of the external elements of each building, including but not limited to, cladding, balconies and windows.

All actions from the FRA's will be given the same timescales as the recommendations/requirement that have been given on the reports.

Each FRA will provide an overall risk for each block and this will determine the frequency of undertaking new FRAs. These will be programmed to ensure all blocks have a current FRA.

The risk for all properties will not simply reflect on the buildings height but will include a risk assessment of occupancy types, building use, associated or attached building and their use and structural assessments of the building. The FSMP details the agreed methodology for this assessment and the timescales for reassessment.

In addition to formal FRAs, we will also carry out Fire Safety Inspections to BIS, sheltered and hostels. Checks are made by estate officers and compliance (clutter) teams.

We will ensure we have sufficient resource to remove items of combustible materials and hazards which may impede safe evacuation or fire brigade access from communal areas.

We will undertake annual checks of all flat, front entrance doors (both sides of the door) for all buildings in scope, and quarterly checks of all associated communal fire doors.

We will only use construction products defined as Designated Products or Safety Critical Products where applicable.

## **5. Stock Sustainability**

Providing high quality, safe home to our residents is a core driver for housing.

We have a significant number of homes over 50 years old and undertaking significant fire stopping programmes is extremely challenging. This needs to be considered to ensure the best use of funds which can deliver our statutory obligations around repairs and maintenance, Decent Homes and housing management and continue to meet our growth objectives.

Where FRAs highlight significant programmes of planned works being required we will review the long term sustainability of a block and whether alternative options should be considered in line with our Housing Asset Management Strategy.

## **6. Engagement with Stakeholders**

### **6.1 Residents and Leaseholders**

The Hackett review highlighted the need to engage residents in the fire safety of buildings and treat them as partners, both to seek their views and opinions but also to ensure they understand their duties.

We will therefore:

- Make FRAs available to residents on request
- Ensure engagement is embedded in our core service offer both during works programmes and under normal circumstances



- Ensure residents are involved in decisions around health and safety works to their homes
- Ensure complaints are dealt with fairly and transparently
- Ensure all residents are made aware of relevant fire strategies, LBH responsibilities and residents responsibilities at the time of sign up
- Ensure residents are aware of how to raise concerns or issue with fire safety and health and safety within their buildings

For buildings over five stories or 11 meters, as well as buildings over 6 stories or 18 metres high, the Compliance team will be principally tasked with ensuring engagement. For lower rise buildings, this will be through both the fire safety teams and tenancy teams

We will:

- ensure a resident engagement strategy is produced for all properties clearly defining this approach and ensuring residents have clarity over the complaints process.
- publish guidance on fire safety on our website and include clear guidance of how to contact us with concerns.
- attend at least annually a residents meeting to discuss fire related issues and upcoming works.
- publish annual guidance and reminders in our magazine provided to residents.
- run targeted campaigns when there are significant changes in legislation.

All resident engagement approaches will be approved by the Director of Housing.

## **6.2 Regulator of Social Housing**

As a provider of Social Housing LBH is accountable to the regulator for Social Housing who take a co-regulation approach to ensuring providers meet economic and consumer standards, explicitly that contained in the home standard:

*“Registered providers shall meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.”*

The Director of Housing will be responsible for managing a proactive relationship with the Regulator and to ensure all standards are met.

### **6.3 Building Safety Regulator**

The Building Safety Regulator has a significantly greater scrutiny and oversight role, coupled with the ability to impose sanctions for breaches that will need to be taken into account and followed through by LBH”

The duty holder and deputy duty holder will be responsible for managing a proactive relationship with the regulator (or HSE as appropriate).

All structural or fire safety occurrences which could cause significant risk to life will be reported to the Building Safety Regulator by the duty holder.

### **6.4 London Fire Brigade**

The LFB are able to provide considerable support and local level scrutiny over LBH approaches and are therefore an essential partner. The Fire Safety Manager will be responsible for ensuring a good working relationship is established through open dialogue and regular meetings.

### **6.5 Councillors**

The Regulator for Social Housing stated in its review of the consumer standards in 2019 that;

*“Boards and Councillors are responsible for ensuring register providers meet the consumer standards, this is a fundamental part of the registered provider’s commitment to co-regulation. Registered providers should have the systems and processes in place to provide assurance to their Boards and Councillors that the standards are being met.”*

We will ensure that Compliance is reported monthly to Councillors via the Theme Board and all exceptions are highlighted. Action plans for achieving compliance will be shared with Councillors.

We will provide an annual Compliance Statement at the end of each financial year detailing our position and remedial actions required.

### **6.6 Compliance Board**

The Compliance Board will provide first line governance on all fire risk related activities and will consist of (as a minimum) senior housing staff, officers from corporate H&S and audit as detailed in the Terms of reference.

This meeting will be chaired by the duty holder or assistant duty holder and minutes made available to the accountable person.

All performance and relevant matters will be reported to this group as will all engagement strategies.

The Compliance board will ensure policies and management plans are adhered to report any non-compliance to the accountable person.

The Responsible person will be expected to keep a watching brief on changing legislation and update the compliance board accordingly.

## **6.7 Housing Staff**

Staff will be provided with relevant training subject to their roles and will be communicated to via updates from the Fire Safety Manager on any relevant changes in legislation or approach (please refer to section 16 of this policy).

## **6.8 Other Relevant Council Teams**

Where works or surveys are happening which may impact on other teams within the Council the project team will need to demonstrate that they have engaged relevant teams including the fire safety team.

This will be captured at project team meeting and minutes kept of the engagement and outcomes.

# **7. Resident Responsibilities**

The Building Safety Act (2022) has increased duties on landlords and building owner but it has also highlighted increased duties on tenants, leaseholders and occupiers.

We will take appropriate action where;

- Tenants or leaseholders making structural alterations to their flats, such as removing supporting walls, that undermine the structural integrity or compartmentation of the building, or failing to put right dangerous alterations that they are liable for;
- Tenants or leaseholders remove and replace compliant fire doors or windows;
- Tenants or leaseholders damage or remove fire safety features in the common parts of a building, such as fire extinguishers, sprinklers or alarm systems; or
- Tenants or leaseholders hinder or frustrate officers in the performance of their duty to maintain the fire and structural integrity of the building and keep residents safe

For all elements related to residents undertaking works to their homes we will ensure our Landlords Consent process is robust to deal with tenants who undertake non-compliant work.

The Act will provide the ability for authorities to take civil action against tenants and leaseholders who put the health and safety of a building at risk. This will be the last option for LBH and will only be used when all other routes have been exhausted.

Where residents breach any duties in the tenancy agreement or lease related to health and safety, access or undertaking works in their properties LBH will take relevant enforcement action.

We will adopt a zero tolerance approach to ensuring sterile communal environments and work with resident to ensure all communal areas are kept clear of all combustible items.

## **8. TMOs**

A Tenant Management Organisation (TMO) is an organisation set up by tenants and/or leaseholders to manage their estate/block,

LBH will undertake all relevant duties under the Building Safety Act (2022) (2022) and in this policy on properties managed by TMOs.

Where TMOs are responsible for maintenance of buildings and/or blocks in which LBH has designated that the Compliance team is required, TMOs will be required to fully engage with the team and support their responsibilities.

In all cases, the Compliance team will have overarching authority in regards to authorising and control of works to the relevant building and will have the ability to veto works organised by the TMOs if they believe it will compromise the fire strategy or integrity of the building.

This veto will not be used in a vexatious manner.

## **9. Evacuation Strategy**

There are three strategies used for housing:

- i) Stay put;
- ii) Full evacuation, and
- iii) Mixed Evacuation

as per guidance from LFB, contained in the RRFSO - Regulatory Reform (Fire Safety) Order, 2005.

The strategy for each property will be determined by the FRA assessors and will largely be dependent on the type of building and occupancy type. This will be reviewed at each FRA or in the case of an event or change in regulation.

The strategy will be clearly communicated to all residents and where necessary appropriate mitigating measures will be instigated, and a regime of practice fire

escapes put in place, details of the approach will be held as part of the building case file.

## **10. Leaseholder Costs**

The cost for Fire Risk Assessments (FRAs) to individual leaseholders will form part of the annual Act provided to each leaseholder as part of the management fee.

The cost for works will be determined by the individual fire risk assessment and the details within the individual lease.

Where works are of a planned nature consideration will be given as to whether the cost of these works will be charged to leaseholders and subject to the S20 process. Relevant payment terms will be offered to leaseholders in line with our leasehold policy.

It has been acknowledged that there has been a significant failure in programmes of fitting fire doors to individual flats across the whole country, either due to the quality of the door itself or the quality of installation. Fire doors provide a key piece in the overall strategy around managing fire safety by ensuring adequate compartmentalisation between common parts/escape routes and individual flats.

In order to ensure this compartmentalisation is in place, LBH will not charge leaseholders for replacement fire doors where they are found to be non-compliant on the most recent FRA.

If leaseholders subsequently change the door for non-compliant doors they will be recharged for any subsequent rectification works.

LBH will make reasonable endeavours to provide leaseholders with information which we hold on a building, but we will not obtain additional information required by the leaseholder, and we will not unreasonably refuse leaseholders permission to undertake appropriate surveys to our properties.

## **11. Third Parties**

Third parties undertaking works in our properties represent a significant risk to compromising the overall fire strategy for each building.

As part of any procurement exercise for works which may impact on fire safety we will require a full set of risk assessments and methods statement (RAMS) from contractors. Failure to provide adequate RAMS will preclude contractors from undertaking works to our properties; this will need to be approved by the Fire Safety Manager.

We will only allow fully accredited companies to undertake fire stopping works to our properties and where relevant we will require third party accreditation to validate the quality of install prior to taking handover of works.

All fire related works undertaken will comply with current building regulations, and will be checked by a suitably qualified fire officer or consultant for compliance.

We will ensure all contracts for works include specific clauses to ensure all relevant works are accredited and full liability will remain with contractors if this is not provided.

Where a building has a Building Safety Manager they will be part of the procurement process for any works and will be responsible for monitoring the quality of works, adherence to specifications and site specific RAMS.

## **12. Data Storage & Sharing**

### **12.1 - Building Safety Case File**

The Building Safety Act (2022) will require LBH to hold a Building Safety Case file for each of its relevant properties above five stories and 11 metres, as well as six stories and 18 metres. This must be held where it is available to all relevant stakeholders and can be accessed in an emergency.

Whilst the regulations have identified only buildings above a certain height require a safety case, LBH will provide one for all multi-occupancy buildings. LBH as a minimum will hold details of the most recent FRA, drawings and plans of each property, details of evacuation or stay put plans and relevant details of tenants where applicable (oxygen user, personal evacuation plans, etc).

The Fire Safety Manager and the Compliance team will be responsible for ensuring the building safety case files are present and up to date.

### **12.2 - Safety Case Report**

The Accountable Person will be responsible for producing a Safety Case Report for all buildings which fall under the Building Safety Act (2022) (2022) which will answer the question;

*“Can you identify the building safety risks in your building, and show me how you manage these on an ongoing basis, as far as you can, so that it is safe?”*

This will be reviewed every six months or at any significant event.

This will be delegated to the Compliance team and will summarise all of the key components of the Building Safety Case file and will be submitted to the Building Safety Regulator.

All information will be held in LBHs document management system, Swordfish, and linked to our Housing Asset Management system, Keystone.

We will ensure a mechanism is in place to ensure the London Fire Brigade have access to this information as required.

It is likely that the information required may change over time, our management plan will be updated to reflect these requirements and we will ensure adequate resource is made available to meet any changes. (see management plan).

## **13. New Build Properties**

As a minimum all new build properties will meeting Building Regulations standards and prior to occupation will have been signed off by Building Control or appropriate accredited body.

All relevant properties will have a full developed fire strategy which will be approved by an accredited body and will form part of the building safety case file.

All relevant properties will have full operation and maintenance manuals (O&M) which provide full as built details, full mechanical and operational layouts and full details of all maintenance schedules for equipment. This will form part of the building safety case file and will inform the maintenance teams of works schedules.

The new Fire Safety Act will introduce a number of Duty Holders and Gateways for buildings over 6 stories or 18m which clearly set out roles and responsibilities across the development teams, and for recording the steps which have to be taken to ensure the overall fire strategy is adhered to at all stages of the project.

These will be recorded and projects will not be able to move forward until each gateway has been completed.

Prior to occupation a Building Assurance Certificate will be required for all properties over 6 stories or 18m, no occupation will be allowed until this has provided.

Whilst the Fire Safety Act is aimed at building of over 6 stories or 18m, LBH will adopt a similar approach to all multi-occupancy building which its owns or manages.

## **14. Assurance and Review**

In order to provide overview and governance of compliance a Housing Compliance board has been created, chaired by the Director of Housing. All operational matters will be reported to this board and it will be responsible for ensure continued compliance with this policy and management plan.

This group will report upwards to both SLT and corporate H&S performance board.

A full suite of KPIs will be provided to the Compliance board, SLT and Theme Board on a monthly basis which will show our compliance position across all areas, any programmes which are working towards full compliance and action plans which will demonstrate actions being taken to attain and remain fully compliant.

The KPIs will not only provide the compliance position but also actions which flow from risk assessments to ensure no actions go past their due date. Any changes will be approved by Compliance Board

We will undertake bi-annual internal audits to test the systems, processes and data held.

We will undertake internal/external audits in line with the corporate plan.

We will engage an external expert to provide support to the Cabinet which will ensure they are able to understand and fully scrutinise the data being presented to them.

## **15. Staff training**

LBH will ensure all relevant training be provided to staff. This will be dependent on roles and responsibilities. A full training matrix is contained in the Fire Safety Management plan.

## **16. Equal Opportunities Statement**

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:

- i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.



An EqHIA (Equality and Health Impact Assessment) has been carried out and accompanies this policy.

The Council seeks to ensure equality, inclusion, and dignity for all in all situations.

The Council will seek to ensure that this policy is, at all times, implemented in a manner that is fair to all sections of the local community.

All applicants for housing or re-housing will be invited to indicate if they wish to make use of the Council's translation and interpretation services, or if they require additional services to enable them to access and understand the policy to ensure that they are not disadvantaged in any way.

They also will be invited to provide details of ethnic origin, sexuality, disability and other equalities information. Provision of this information is not obligatory or a requirement for acceptance of an application.

However, such information will help monitor the number and types of protected characteristics requiring support, and will help ensure that service improvement evolves in line with any changing local needs.

Equalities records will be kept and monitored to ensure accommodations are offered and allocated fairly. This policy will be regularly reviewed ensure it is not operated in any way that could discriminate or disadvantage against any particular group of people.

All information provided will be kept confidential and treated with respect at all times.

## **17. Data Protection Statement**

Havering Council takes personal privacy matters very seriously and will never share the individual's personal data without their prior knowledge, unless required to do so by law.

For full details about how the Council protects personal data, please visit [Havering Council Data Protection policy](#).

## **18. Dissemination and communication of this policy**

Housing Services will consult with all affected stakeholders, directly or indirectly, to ensure this policy fulfils its purpose to be clear and transparent.

This policy will be made available internally and externally in hard copy and electronic versions, as well as various formats – such as easy read, multi-lingual, braille and audio - upon request.

## **19. Implementation of this policy**

This policy will take effect from September 2025.

Responsibility for the successful implementation of this policy will be with Havering Council's Assistant Director of Property, Housing and Asset Services.

## **20. Monitoring and review of this policy**

This policy will be reviewed annually or at any significant change in relevant legislation.

The Fire Safety Management Plan (FSMP) will be reviewed annually or at any significant change in legislation or best practice.

Bi-annually the policy and management plan will be reviewed by an independent external expert to ensure continued compliance with legislation and best practice.

## **21. Delegated authority to make minor changes to this policy**

The Assistant Director of Housing, Property & Assets in consultation with the Director of Housing, will be able to approve minor amendments; i.e. amendments that do not significantly change this policy or associated procedures.