# Joint Working Protocol Birmingham City Council and West Midlands Fire Service to Improve Fire Safety in Houses in Multiple Occupation **Birmingham City Council** WEST MIDLANDS FIRE SERVICE

A report recommending that the national protocol between local housing authorities and fire and rescue authorities to improve fire safety be formally adopted by Birmingham City Council and West Midlands Fire Service subject to certain local amendments and agreements.

- 1. Summary of the respective roles of local housing authorities (LHAs) and fire and rescue authorities (FRAS) with respect to fire safety in houses in multiple occupation
- 1.1 The Housing Act 2004 introduced the Housing Health and Safety Rating System (HHSRS) and licensing of houses in multiple occupations (HMOs). The HHSRS is the principal tool for assessing fire safety risk and regulating standards in all types and tenures of residential accommodation. HMO licensing conditions can also be applied for the regulation of fire safety standards in licensable HMOs. These duties are enforced by local housing authorities.

  Guidance under this legislation for housing providers and local housing authorities is contained in the HHSRS operating guidance and secondary legislation.
- 1.2 The Regulatory Reform (Fire Safety) Order 2005 places duties on housing providers to risk assess fire safety in their properties and to take adequate precautions to reduce that risk. The duties apply throughout a range of property types but in HMOs, flats and maisonettes and sheltered accommodation in which care is not provided, they apply only within the common areas. These duties are enforced by fire and rescue authorities. Guidance for housing providers and fire and rescue authorities is contained in HM Government Fire Safety Risk Assessment Sleeping Accommodation Guide.
- 1.3 Communities and Local Government (CLG)
  has, however, commissioned Local Authority
  Coordinators of Regulatory Services to produce
  new national guidance on fire safety measures
  specific to residential premises and in particular
  HMOs. The new guidance has been published
  and is currently under review.
- 1.4 In respect of HMOs, flats, maisonettes and sheltered accommodation in which care is not provided, the new regulatory framework provides for dual enforcement between local housing authorities under the Housing Act 2004 and Fire and Rescue Authorities under the Regulatory Reform (Fire Safety) Order 2005. Both authorities have powers to close all, or parts of a premises through the serving of a prohibition order or notice where there is an imminent and serious risk of harm to the occupiers through fire. Both authorities have powers to serve a notice requiring specific works to be carried out within a specified period of time and both authorities have powers of prosecution for non-compliance with the legislation under their remit.

- 2. Protocol between local housing authorities and fire and rescue authorities to improve fire safety
- 2.1 In recognition of these dual enforcement roles, a consortium of organisations concerned with fire safety in residential premises, known as the Fire Safety and Housing Working Group, was commissioned by Communities and Local Government. The intention was to develop a protocol aimed at:
  - clarifying the legal framework under which both enforcement authorities operate
  - ensuring consistency of standards
  - · improving data sharing arrangements
  - improving joint training and awareness opportunities
  - improving communication.
- 2.2 The protocol was given ministerial approval and published in May 2007. It is an expectation of the Government that both enforcing authorities, should formally adopt the principles set out in the Protocol and ensure that clear local arrangements are agreed and put into operation.
- 2.3 Birmingham City Council (the LHA) recognises the authority of the Protocol and will work in partnership with West Midlands Fire Service (the FRA) to adopt the principles contained therein. Certain aspects of the Protocol, however, are in need of further development in line with local circumstances in order to achieve the following:
  - an agreement as to which enforcing authority will take the leading role in which type of premises
  - an agreed course of emergency action to deal with high-risk situations
  - · an agreed prosecution policy
  - agreement as to required standards in different types of HMO and timescales for compliance
  - agreement as to consultation procedures and the exchange of information.

# 3. Which authority should take the leading enforcement role in which types of premises

- 3.1 The Protocol contains tables listing the types of premises that each enforcing authority should regard as being their primary responsibility for enforcement of fire safety standards.
- 3.2 It is considered necessary to expand upon the property descriptions as given in the Protocol to take in to account the types of property and situations likely to be encountered.

### Table one: Birmingham City Council

Description of the type of premises for which the local housing authority (Birmingham City Council) will normally take the lead for inspection and enforcement action with respect to fire safety

Description as given in the national protocol	Supporting notes and local agreements
Single dwellings including shared housing.	This includes all privately rented houses shared by groups of students, professionals and so on.  Support aimed at raising standards of fire safety in such premises may be provided by the fire and rescue authority through the Home Fire Safety Risk Assessment Programme.
All HMOs whether or not subject to mandatory, selective or additional licensing.	HMOs will be regarded as defined in Sections 254 to 260 of the Housing Act 2004.  Most private sector hostels also fall within the definition of HMO, however, such hostel accommodation is later specified as falling to the fire and rescue authority as having the lead enforcing role. It has been agreed that those hostels accommodating up to and including seven people, where the characteristics of the building remain essentially that of a shared house shall remain with the LHA.
All self-contained flats, whether purpose built or converted.	Houses converted into self-contained flats which fall within the definition of HMO in accordance with Section 257 of the Housing Act 2004, shall fall to the local housing authority as the lead enforcing role. This also includes individual flats within houses converted into self-contained flats that do not fall within the definition of HMO, and individual flats within purpose built blocks.  The communal areas of purpose built blocks of flats (including city centre apartment blocks) plus communal areas of houses converted into self contained flats, which do not fall within the HMO definition, shall fall to the fire and rescue authority as the lead enforcement role.

# Table two: West Midlands Fire Service

Description of the type of premises for which the fire and rescue authority (West Midlands Fire Service) will normally take the lead for inspection and enforcement action with respect to fire safety

Description as given in the national protocol	Supporting notes and local agreements
Premises with mixed commercial and associated residential accommodation and sheltered housing.	<ol> <li>This is to include:</li> <li>Accommodation occupied by staff in connection with their employment within the same premises (for example staff accommodation above or below restaurants, public houses and shops).</li> <li>Flats (whether or not in multiple occupation) located above commercial premises that were previously subject to action under Section 72 of the Building Act 1984 where the floor level is 4.5 metres or more above the adjoining ground level. (Section 72 has since been repealed by the Housing Act 2004).</li> <li>Sheltered housing schemes regardless of tenure (local housing authority, registered social landlord, privately rented or owner occupied).</li> </ol>
Hostels, bed and breakfast and hotels.	1. As pointed out in table one, certain smaller hostels (those with seven or less occupiers) should fall to the local housing authority as the lead enforcing role.  All other hostels regardless of tenure will fall to the fire and rescue authority. The definition of hostel is given in section 3.3.  Hotels and bed and breakfast establishments where there is a mixture of paying guests and persons who would otherwise be homeless may be declared as HMOs under Section 255 of the Housing Act 2004, where the use by those persons as their only or main residence becomes significant.  Such use shall be regarded as being significant when 25 per cent or more of the available bed spaces are regularly occupied by people as their only or main residence.  Hotels and bed and breakfast establishments which are declared to be HMOs shall remain with the fire and rescue authority as lead enforcers.

# Table two: West Midlands Fire Service

Description of the type of premises for which the fire and rescue authority (West Midlands Fire Service) will normally take the lead for inspection and enforcement action with respect to fire safety

Description as given in the national protocol	Supporting notes and local agreements
	2. Other types of premises which have similar characteristics to hostels but which may not technically meet the hostel criteria should fall to the fire and rescue authority. These include:
	<ul> <li>Student halls of residence whether owned or managed by a university or college of higher or further education or by a private landlord.</li> </ul>
	<ul> <li>Nurses or doctors accommodation managed by a NHS Trust or similar.</li> </ul>
	Police and fire service accommodation.
	<ul> <li>Religious establishments where accommodation is provided (such as priories, convents, training colleges and so on).</li> </ul>
	<ul> <li>Hostels for travellers, backpackers, scouts and the like, which provide short stay accommodation for people who would not otherwise be homeless.</li> </ul>
All multiple-occupied accommodation that is owned or managed by the local housing authority.	This would include all hostels operated by Birmingham City Council.
	Although not technically classified as being multiple- occupied, it has been agreed that all high-rise accommodation (tower blocks) owned or managed by the local housing authority should also fall to the fire and rescue authority.

#### 3.3 Definition of a hostel

There appears to be no overall legal definition of a hostel. A note appears next to the table in section two of the National Protocol which describes hostels as generally having a requirement for residents to have a particular need or dependency, and they do not provide permanent accommodation.

The Housing Benefit Regulations 2006 include the following phrases in the definition of a hostel (although these regulations only apply to hostels managed or owned by registered housing associations or hostels operated other than on a commercial basis and funded wholly or partly by local authorities or other government department or agency):

hostel means a building in which there is provided for persons generally or for a class of persons, domestic accommodation, otherwise than in separate and self-contained premises, and either board or facilities for the preparation of food adequate to the needs of those persons.

a building managed by a voluntary organisation or charity which provides care, support or supervision with a view to assisting those persons to be rehabilitated or resettled within the community.

The above definitions give some indication as to what a hostel is, however, for the purposes of this Protocol it is considered that the following factors are of further assistance in deciding whether or not a premises should be classified as a hostel:

- The premises will be a HMO (as defined in the Housing Act 2004).
- The premises will be occupied wholly or partly by people who would otherwise be homeless.
- The premises will be occupied by people, some or all of whom are in receipt of state benefits, (this will normally be Housing Benefit or Local Housing Allowance).
- The accommodation will not be self-contained (that is, there will be sharing of amenities and/ or other living space).
- The premises will be occupied by persons with a particular need or dependency requiring some degree of support or assistance (as opposed to personal care which would then make the premises registerable as a care home under the Care Homes Act 2000).
- The accommodation will generally be provided on a temporary basis for occupiers awaiting more settled long-term housing. It should be noted, however, that some residents may have resided at a particular hostel for many years and are unlikely to ever access long-term housing.

• There will generally be some form of additional services provided, such as meals, cleaning and laundry. It is likely that staff will be employed at the hostel and there will be some degree of management on site (whether part or whole day) to supervise the needs and safety or behaviour of the occupiers. It is likely that there will be a responsible person on site.

#### Emergency action to deal with high risk situations

- From time to time, premises are identified either as a result of a fire related incident, complaint or programmed inspection which present a serious and imminent risk to the health and safety of the occupiers through fire. Examples of this would include a three or more storey HMO:
  - lacking a working fire detection and warning system
  - lacking structural fire protection
  - lacking a safe means of escape from fire
  - where there are large amounts of stored flammable materials.

In such circumstances, the delay involved in following the statutory process to bring about an improvement in the situation by the serving of an Enforcement Notice under the Fire Safety Order or an Improvement Notice under the Housing Act 2004 may not be acceptable.

- 4.2 Both enforcing authorities have powers of emergency closure of all or part of a premises in such circumstances which can result in all or some of the occupiers having to vacate the premises immediately.
- The emergency closure of a premises can be very traumatic for the displaced occupiers because they are faced with urgently having to find alternative accommodation. The occupiers of HMOs, particularly those in hostel type accommodation, are often vulnerable and find the trauma of finding such alternative accommodation very problematic. Rather than seek help from the council, they may seek accommodation with friends, relatives or other acquaintances and may sleep on floors, or in overcrowded bedrooms, perhaps in a more hazardous situation than that from which they have been displaced. At worst they might find themselves homeless.
- It is therefore important for both authorities to carefully consider the effect that taking emergency closure action will have and should be seen as a last resort when other courses of action are unlikely to achieve a satisfactory outcome.
- There are occasions however, when it will quickly become apparent that emergency closure is the best course of action. Where the premises concerned has been badly damaged by fire or

is generally unsuitable for occupation (such as a poorly converted commercial building) or severely overcrowded then closure is appropriate. Also, inner room situations may necessitate closure only of the rooms affected if an alternative means of escape cannot readily be achieved.

- Where emergency closure action is taken, the occupiers affected will be provided with assistance by the council on how to seek alternative accommodation. It is proposed that an advice leaflet will shortly be available in a range of languages which will explain the effect of the closure action, where to go to seek alternative accommodation and the range of housing options available according to the varying circumstances of the occupiers affected. The leaflet could then be handed out to the people concerned and also affixed to a communal part of the house so that occupiers who are away when the action is initially taken are made aware upon their return.
- Where the premises concerned is otherwise satisfactory apart from the imminent risk of harm through fire, other courses of action should be explored before proceeding with emergency closure.
- Local housing authorities have powers to carry out emergency remedial action to remove any immediate and serious hazard without having to serve notice upon the landlord before taking such action. Notice is served post - action and costs are then recoverable from the landlord. Similarly, the fire and rescue authority is able to provide interim assistance, for example, the fitting of battery operated smoke alarms to reduce an imminent risk to an acceptable level as a temporary measure, although the costs incurred are not recoverable.
- If the immediate hazard can be reduced to an acceptable level through taking emergency remedial action or interim assistance, then it may be possible for the occupiers to remain in residence until more long-term work can be carried out to bring the premises up to required standards.
- 4.10 The type of work which could be done by the local housing authority under emergency remedial action powers is likely to include:
  - repairing faulty or inoperative existing fire detection and warning systems
  - installing temporary battery operated smoke alarms
  - repairing damaged fire doors
  - providing fire doors to rooms of higher fire risk, such as kitchens
  - removing obstructions or flammable materials from escape routes
  - repairing dangerous electrical installations.

In most cases it should be possible for emergency remedial action to start on the same day that

- the officer visits. Work would be carried out by contractors selected from the local housing authority's approved list.
- 4.11 Where a high risk situation is identified by the fire and rescue authority outside normal office hours (usually this will be as a result of attending a fire related incident) it may not always be possible for an officer from the local housing authority to visit immediately to assess the hazard and arrange for emergency remedial action to be taken.

In such circumstances, it may be more appropriate for the fire and rescue authority to provide interim assistance (such as fitting temporary battery operated smoke detectors). This should only be done if it is considered to provide adequate protection until an officer from the local housing authority is able to visit either the next day or the first working day after a weekend or bank holiday.

Where the fire and rescue authority considers that the provision of interim assistance will not provide an adequate level of temporary protection, then emergency closure of all or part of the premises in question may be more appropriate.

The council will endeavour to ensure that an officer visits such situations jointly with the West Midlands Fire Service without delay on the day of receipt of the notification. It is however, unlikely at this stage to be able to provide 24 hour out of hours cover (other than the emergency homeless contact service). The situation will be kept under review to assess whether the number of cases arising out of normal office hours would justify the provision of an enhanced service.

4.12 Furthermore, local housing authorities have powers in certain circumstances to take over control of premises through the making of an Interim Management Order. Where the premises concerned is a licensable HMO that is not licensed and there are concerns over the ability of the current landlord to properly manage the property, it is possible to make such a management order relatively quickly (perhaps within two to three days). This may be a preferable solution to resolve a high-risk situation depending on the circumstances.

> Where the HMO concerned is not licensable then a management order can only be made with prior approval of the Residential Property Tribunal (RPT). The timescale involved in obtaining such approval from the RPT is not currently known and the council will make further enquiries to establish whether any potential delays can be overcome. If the procedure proves to be too lengthy (more than seven days) then the making of a management order with respect to a nonlicensable HMO may not be appropriate to resolve a high-risk situation.

#### 5. Prosecution procedure

- 5.1 Both enforcing authorities have powers to prosecute where a breach of legislation under their remit is identified. Where there is an overlap of these powers, there will be an expectation that the authority taking the lead role in bringing a prosecution will be in accordance with the type of premises concerned as identified in tables one and two (unless death or serious injury has occurred as a result of a fire incident, in which case the powers of prosecution under the Fire Safety Order may be more appropriate see paragraphs 5.6 and 5.7 below).
- 5.2 Prosecutions will not be brought in all cases and enforcement policies of the council and the West Midlands Fire Service will be taken into account as well as the Regulators' Compliance Code which came into operation on 1 April 2008 under The Legislative and Regulatory Reform Act 2006. The code places the five principles of good regulation on a statutory footing, stating that regulators should be proportionate, accountable, consistent, transparent and targeted in carrying out their regulatory activities.
- 5.3 Circumstances where a prosecution is likely to be instigated

A prosecution will normally be undertaken when:

- an individual or company has deliberately, negligently or persistently breached legal obligations
- an individual or company has deliberately or persistently ignored written warnings or formal notices or orders
- an individual or company has endangered, to a serious degree, the health, safety or wellbeing of occupiers, visitors or the public
- an individual has assaulted or obstructed an officer in the course of their duties.
- 5.4 Where a fire or other incident has occurred in a HMO requiring the attendance of West Midlands Fire Service, this will always be treated as a potential case for prosecution where a breach of legislation can be identified.
- will, where necessary, carry out a joint inspection of the premises concerned with officers of West Midlands Fire Service as soon as possible to reduce the likelihood of evidence being lost. Ideally, this should be within 24 hours of the incident or on the first available working day following a weekend or bank holiday. Initially, evidence of any potential breaches of legislation should be gathered by West Midlands Fire Service officers attending a fire incident (such as an inoperative fire alarm system, damaged or ineffective fire doors, or obstructed escape routes and so on).

- There is an expectation that officers from either enforcing authority will provide a witness statement in support of any potential prosecution taken by the other authority.
- 5.6 Offences under the Housing Act 2004 are all summary offences punishable by a fine with specified maximum amount whereas offences under the Fire Safety Order can be dealt with either summarily or be indictable on conviction with an unlimited fine and/or prison sentence not exceeding two years.
- 5.7 In cases where death or serious injury has resulted through gross negligence by the person responsible for the premises, then it may be more appropriate for the prosecution to be taken by the fire and rescue authority rather than the local housing authority even in properties for which the local housing authority has the lead enforcement role. In such cases, the advice of legal services representing both authorities should be taken to decide the most appropriate course of action.

#### 6. Agreed standards and timescales for compliance

- 6.1 For most types of HMO the standards specified in the Homestamp guidance document will be accepted by both authorities as being appropriate and neither authority shall seek to impose a different standard without prior consultation and agreement. New national guidance was published on 23 July 2008 by the DCLG through LACORS which alters some of the standards as currently prescribed in the Homestamp document.
- 6.2 The Homestamp document will therefore be subject to some amendment in line with the national guidance. It is proposed that a working party of officers representing the Homestamp consortium will look in to this as a matter of urgency. The new national guidance also contains a section advising landlords and managers on how to carry out a fire risk assessment. It is proposed that this information will be brought to the attention of all HMO licence holders and accredited landlords in due course either through direct mailings, newsletters, landlord forums and the council's web site.
- 6.3 Some concern has been expressed by officers of West Midlands Fire Service that the council may be allowing an excessive period of time for compliance with the requirements of improvement notices and licence conditions that relate to fire protection in HMOs. There is a statutory minimum period for works to commence within 28 days in all cases and a reasonable period must be allowed for completion of the work thereafter. It should however be recognised that if a landlord makes a formal appeal to the Residential Property Tribunal against an improvement notice or licence, then the action is suspended until the matter is determined by the Tribunal.

Although rare, in such cases the premises in question may continue to operate without proper fire protection for an extended period. The opinion of West Midlands Fire Service will be sought regarding the adequacy of the current fire safety provisions in these premises, and whether it may be necessary to consider issuing an Article 31 notice under the RR(FS)O 2005 prohibiting some or all of the premises until the appeal is heard and all fire safety matters are dealt with.

- 6.4 Where the situation calls for the installation of a full automatic fire detection and warning system, emergency escape lighting, the installation of fire doors or the provision of a safe means of escape then the council will seek to impose a maximum time limit for compliance of six weeks from the end of the statutory 28 day commencement period.
- i.5 In cases where existing fire precaution measures require upgrading rather than installation in the first instance, or complete replacement, then an extended period for compliance may be specified, depending upon the assessed risk.

#### Consultation procedures and exchange of information

- 7.1 Consultation must take place wherever possible between the council and West Midlands Fire Service prior to taking action in relation to any fire hazard in a HMO or building containing flats (Section 10 of the Housing Act 2004) and before issuing a HMO licence (Article 42 of the Fire Safety Order).
- 7.2 An arrangement is currently in place where an officer of West Midlands Fire Service visits the Private Rented Services Team on a regular basis (usually weekly) to review and comment on all fire precautions schemes that are proposed in connection with a statutory notice or licence.
- 7.3 Details of the property addresses concerned and ownership details are noted for West Midlands Fire Service records as necessary.
- 7.4 This arrangement works well and it is recommended that this procedure should continue.
- 7.5 Having regard to Article 43 of the Fire Safety
  Order, any term or condition of a HMO licence is
  superseded by any requirement of the Fire Safety
  Order for the purposes of taking emergency
  action. West Midlands Fire Service will wherever
  possible consult with Birmingham City Council
  before taking such action with respect to a
  licensed HMO, in order that the licence holder
  may be informed of the effect of the action on
  the licence conditions.

#### 7.6 Fire incidents

West Midlands Fire Service has agreed to inform Birmingham City Council of any fires in HMOs and arrange joint inspections wherever possible after the incident. Such inspections will be carried out not only to look at fire safety issues, but also other issues relating to the property such as the overall condition of the HMO and suitability for habitation.

#### 7.7 Data exchange

The public register of licensed HMOs will be supplied to West Midlands Fire Service on a regular basis. The database of other non-licensed HMOs will also be made available by Birmingham City Council to West Midlands Fire Service upon request.

Non-licensable HMOs are unlikely to be inspected by the Private Sector Housing Team within the current programme (although some properties which are in some way funded or supported by the council may be inspected as and when resources permit).

The list of non-licensable HMOs may therefore be of assistance to West Midlands Fire Service as part of the Home Fire Safety Risk inspection programme.

#### 7.8 Joint enforcement activity

Where an improvement notice or informal letter requiring fire safety work has been sent in respect of a HMO, or where licence conditions have been applied in respect of fire safety, West Midlands Fire Service may carry out follow up inspections or arrange joint inspections with the Private Rented Services Team to assess progress with the works. Alternatively, West Midlands Fire Service may inspect the fire safety measures on their behalf. If any work is outstanding, West Midlands Fire Service will report back so that any enforcement sanctions under the Housing Act can be applied as necessary.

Joint inspections by officers of West Midlands Fire Service and Birmingham City Council will also be carried out wherever possible in connection with any programmed visits where this will avoid duplication of effort, For example, joint inspections would be appropriate as part of the hostels inspection programme or as part of an area based initiative.

Such arrangements will be reviewed annually.

#### 7.9 Training

Both authorities will undertake to provide training on their respective roles, legislation and any technical issues from time to time.

#### 8. Contact officers

8.1 Contact officers for consultation on a strategic level (policy and procedural issues)

**West Midlands Fire Service** 

Position of officer: Head of Operational Intelligence and Fire Safety

Name of current post holder(s): Ian Kemp

**Tel:** 0121 380 6400

Email: ian.kemp@wmfs.net

**Birmingham City Council** 

Position of officer: Private Rented Services Business Manager

Name of current post holder(s): Martin Brooks

**Tel:** 0121 303 4009

Email: martin.brooks@birmingham.gov.uk

8.2 Contact officers for consultation on a tactical level (emergency situations)

**West Midlands Fire Service** 

Position of Officer: Birmingham Legislative Fire Safety Manager

Name of Current Post Holder(s): Steve Sharpe

**Tel:** 0121 327 7727

Email: steve.sharpe@wmfs.net

**Birmingham City Council** 

**Position of officer:** HMO Team Leader/Environmental Health Officer **Name of current post holder(s):** Haroon Chaudhry or John Venables

**Tel:** 0121 303 4009 or 303 6849

**Email:** haroon.chaudhry@birmingham.gov.uk john.venables@birmingham.gov.uk

8.3 Contact officers for consultation on a tactical level

(non emergency situations – such as proposals for inspection programmes)

**West Midlands Fire Service** 

Position of officer: Head of HQ Fire Safety Policy Section Name of current post holder(s): Jonathan Herrick

**Tel:** 0121 380 6300

 $\textbf{Email:}\ jonathan.herrick@wmfs.net$ 

**Birmingham City Council** 

Position of Officer: HMO Team Leader or Service Manager

Name of current post holder(s): Haroon Chaudhry or Chas Power

**Tel:** 0121 303 4009

**Email:** haroon.chaudhry@birmingham.gov.uk chas.power@birmingham.gov.uk

Contact officers for individual property consultation

**West Midlands Fire Service** 

**Position of officer:** Fire Safety Inspecting Officer

Name of current post holder(s): Gary Callaghan, Dave Hall

**Tel:** 0121 753 1313

**Email:** gary.callaghan@wmfs.net

dave.hall@wmfs.net

**Birmingham City Council** 

Position of officer: Improvement Officer/Environmental Health Officer

Name of current post holder(s): Nick Beacham or John Venables

 $\textbf{Tel:}\ 0121\ 303\ 2051\ or\ 303\ 6849\ or\ 303\ 4009$ 

**Email:** nick.beacham@birmingham.gov.uk

john.venables@birmingham.gov.uk

#### 9. Recommendation

9.1 That the national joint protocol be formally adopted by West Midlands Fire Service and Birmingham City Council subject to the above local amendments and agreements. There will be an annual review of this protocol to ensure that all contact details are still relevant. This will be the responsibility of the headquarters fire safety policy manager in conjunction with the private rented services business manager.

#### 10.0 Signatories to the protocol

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Name: Douglas Tweddle

**Position:** Director of Operational Support

SIGNATURE:
DATE:

#### 10.2 On behalf of Birmingham City Council

Name: Elaine Elkington

**Position:** Acting Strategic Director for Housing and Constituencies

SIGNATURE:
DATE:

