

# Fire Safety Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	February 2024
Review date:	February 2027

1	Introduction
1.1	One Vision Housing (OVH) treats the health and safety of its tenants, staff, contractors and other users of its buildings of paramount importance. The Policy covers OVH’s responsibilities to comply with the relevant legislation in managing fire safety in properties it owns and manages.
1.2	<p>In meeting its health and safety responsibilities, OVH will ensure it complies with the relevant legislation in promoting fire safety and risk assessment in the following areas:</p> <ul style="list-style-type: none"> <li>• Office and business premises owned and / or managed by OVH</li> <li>• Community premises owned and / or managed by OVH</li> <li>• Communal areas of buildings containing flats and maisonettes, including independent living stock owned and / or managed by OVH</li> <li>• Exposure of uncontrolled fire and associated smoke at dwellings owned and / or managed by OVH</li> </ul>
1.3	<p>The relevant legislation includes:</p> <ul style="list-style-type: none"> <li>• Regulatory Reform (Fire Safety) Order 2005 (RRO)</li> <li>• Housing Act 2004 – Housing Health and Safety Rating System</li> <li>• Fire Safety Act 2021</li> <li>• Building Safety Act 2022</li> <li>• Fire Safety (England) Regulations 2022</li> <li>• Building Regulations 2010 -Approved Document B (Fire Safety) Volume 1: Dwellings 2020 Edition</li> <li>• Building Regulations 2010 -Approved Document B (Fire Safety) Volume 2: Buildings other than Dwellings 2020 Edition</li> <li>• Health and Safety (Safety Signs and Signals) Regulations,1996</li> <li>• Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022</li> <li>• Furniture and Furnishings (Fire Safety) Regulations 1988 (amended 1989.1993 and 2010)</li> </ul>
1.4	<p>Operation of this Policy also assists OVH to comply with the Regulatory Framework for Social Housing as adopted by the Regulator for Social Housing (RSH) as follows:</p> <ul style="list-style-type: none"> <li>• Meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes</li> </ul>

<p>1.5</p> <p>1.5.1</p> <p>1.6</p> <p>1.6.1</p> <p>1.6.2</p> <p>1.6.3</p> <p>1.7</p>	<p><b>Access and Communication</b></p> <p>OVH is committed to ensuring that the services it provides are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.</p> <p><b>Equality, Diversity and Human Rights</b></p> <p>OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Religion and /or Belief, Civil Partnership and Marriage, Pregnancy and Maternity.</p> <p>OVH also recognises that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p>OVH will endeavour to ensure that all services and actions are delivered within the context of current Human Rights legislation and will make every effort to ensure staff and others with whom OVH works, will adhere to the central principles of the Human Rights Act (1998).</p> <p>This Policy should be read in conjunction with all relevant legislation including the following:</p> <ul style="list-style-type: none"> <li>• OVH Health and Safety Policy</li> <li>• Sovini Fire Safety Management Plan</li> <li>• OVH Communal Areas Policy</li> <li>• OVH Mobility Scooters in Communal Areas Policy</li> <li>• OVH Periodical Electrical Testing Policy</li> <li>• OVH Access to Properties Policy</li> <li>• OVH Hoarding Management Policy</li> <li>• OVH Gas Safety Policy</li> <li>• OVH Repairs, Maintenance and Planned Works Policy</li> </ul>
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<p><b>2</b></p>	<p><b>Statement of Intent</b></p>
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<p>2.1</p> <p>2.2</p>	<p>OVH will comply with all relevant legislation in regard to fire safety and risk assessment.</p> <p>OVH recognise the legal duty of care towards protecting the health and safety of its employees and others who may be affected by its activities. In discharging its responsibilities and in pursuing continual improvement in regard to fire safety, OVH will:</p> <ul style="list-style-type: none"> <li>• Provide an organisational structure that defines responsibilities for health and safety including a responsible person (Defined throughout the rest of this Policy as ,’the most senior person within OVH, with assistance of the Health and Safety Team’) under the RRO defined as: <ul style="list-style-type: none"> <li>○ in relation to a workplace, the employer, if the workplace is to any extent under his control</li> </ul> </li> </ul>
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	<ul style="list-style-type: none"> <li>○ in relation to any premises not falling within paragraph (a) – <ul style="list-style-type: none"> <li>(i)The person who has control of the premises (as occupier or otherwise) in connection with the carrying on by him of a trade, business or other undertaking(for profit or not); or</li> <li>(ii) the owner, where the person in control of the premises does not have control in connection with the carrying on by that person of a trade, business or other undertaking</li> </ul> </li> </ul> <ul style="list-style-type: none"> <li>● Provide adequate resources to control health and safety risks</li> <li>● Encourage staff to identify and report potential fire hazards</li> <li>● Communicate and consult with all employees on matters affecting health and safety</li> <li>● Maintain our premises and provide safe plant and equipment</li> <li>● Provide information, instruction and supervision for employees in fire safety</li> <li>● Provide adequate training and ensure that all employees are competent to do their tasks</li> <li>● Carry out and regularly review risk assessments to identify proportionate and pragmatic solutions to reducing risk</li> <li>● Eliminate risk through selection and design of buildings, facilities, equipment and processes. Where risks cannot be eliminated they will be minimised by the use of physical controls or as a last resort, through systems of work and personal protection</li> <li>● Only engage contractors who are able to demonstrate due regard to health and safety matters</li> </ul> <p>2.3 OVH will ensure that the Policy in its most current form is available to all staff via an internal document control system. All new staff joining the organisation will be made aware of the Policy via the induction process and all other interested parties will be able to access the Policy via the OVH website.</p> <p>2.4 Any changes to the Policy will be recorded in the amendment log and the latest version of the Policy, once approved by the formal scheme of delegation, will be updated in the document control system and on the website. OVH staff will be made aware of changes to the Policy via regular staff updates.</p> <p>2.5 OVH expect tenants and leaseholders to be aware of possible fire hazards around the home and to take steps to protect themselves from fire and to make themselves and others living in their homes aware of the fire guidance included in Home Safety leaflets and bespoke Fire Safety leaflets (available via OVH website).</p> <p>2.6 OVH will work in partnership with the Local Fire Service and the Local Authorities in the areas in which it operates, to safeguard the interest of its staff, tenants and leaseholders.</p>
<b>3</b>	<b>Policy</b>
3.1	<p><b>Hazard Identification, risk assessment and risk control</b></p> <p>OVH will proactively manage fire safety and ensure compliance with legal duties by carrying out the following:-</p> <ul style="list-style-type: none"> <li>○ Identifying and assessing sources of risk in relation to fire safety and undertaking suitable and sufficient fire risk assessments and inspections of all premises and activities within premises required under the RRO</li> </ul>

- Identifying and implementing reasonably practicable control measures to control risk of fire and monitor all fire related incidents and / or near misses
- The responsible person will make a suitable and sufficient assessment of the risk to which relevant persons are exposed for the purpose of identifying the general fire precautions he / she needs to take to comply with the requirements of the RRO
- Establishing procedures for the on-going identification of hazards, the assessment of risk and the implementation of necessary control measures, which will be reviewed in line with any changes to OVH working practices or changes to the Policy
- Consideration will be given to normal and abnormal operations within the organisation and inclusive of potential emergency conditions
- Risk assessments and evaluation of feedback from the investigation of previous fire related incidents, accidents and emergencies will be undertaken
- Measures for managing risk will reflect the principles of the hierarchy of risk control
- Competencies and training requirements will be established as part of the control measures

3.2

### OVH Commitments

3.2.1

As part of a commitment to continually improve fire safety provision, OVH will:

- Ensure all properties and commercial units have working smoke detectors before being let, where required
- Prohibit the use of temporary gas heaters in OVH owned multi occupancy buildings
- Engage suitably qualified and competent contractors to carry out the maintenance and regular inspections of its Fire Detection and Warning Systems, Emergency Lighting, Portable and Fixed Fire Fighting equipment
- Provide instruction and training to all relevant staff so that they know what to do in the event of a fire and have arrangements in place to safely evacuate any premises that are deemed to require fire evacuation plans
- Implement a programme of fire risk assessments and monitoring of fire control measures in all premises owned and managed by OVH (including commercial units)
- Ensure that all premises (including commercial units and leased units) are adequately insured against fire, including protecting the structure of residential properties. OVH will encourage its tenants and leaseholders to purchase their own home contents insurance to protect their own personal belongings through promotion of the partnership insurance schemes via the website and regular publications
- Take reasonable steps to check all properties, which will include testing and servicing of smoke detectors present to ensure they are in full working order (See Gas Safety Policy)
- Provide the Fire Service with up-to-date electronic building floor plans for high rise buildings and place a hard copy of these plans in a secure information box on site
- Provide the Fire Service information about the design and materials of a high-rise building's external wall system and inform them of any material changes
- Undertake monthly checks on the operation of lifts intended for use by the Fire Service and report any defective lifts or equipment if the fault cannot be fixed within 24 hours
- Install and maintain a secure information box in high rise buildings. Ensure boxes contain the name and contact details of the Responsible Person and hard copies of floor plans
- Install and maintain wayfinding signage in high rise buildings, ensuring it is visible in low light or smoky conditions and that it identifies flat and floor numbers in the stairwells

### 3.2.2

- For all residential buildings with storeys over 11 metres in height, OVH will undertake annual checks of flat entrance doors and quarterly checks of all fire doors in the common parts
- For all multi-occupied residential buildings with two or more sets of domestic premises, OVH will provide relevant fire safety instructions to tenants, including how to report a fire and what occupants should do in the event of an evacuation. In addition, OVH will provide information relating to the importance of fire doors in fire safety

For higher-risk residential buildings (HRRB), as defined in the Building Safety Act, OVH will:

- Register HRRBs and display the building assessment certificate
- Develop a safety case report to confirm how building safety risks are assessed and managed
- Retain and provide information and documents to the new regulator, other accountable persons, residents, and others
- Ensure a system is in place for building information to be created, stored, and updated throughout the building's lifecycle
- Provide mandatory reporting to the new Regulator of any fire and structural safety occurrences which could cause a significant risk to life safety
- Engage with residents, including the development and provision of a residents' engagement strategy and a complaints system
- Make provision for the enforcement of any duties placed on residents from new legislation
- Ensure those appointed to work on a higher-risk projects have the relevant skills, knowledge, experience, and behaviours necessary to undertake the role

### 3.3

#### Customer Responsibilities

#### 3.3.1

To reduce the risks of fire customers should:

- Regularly test smoke alarms to make sure they are working properly and not disconnect or remove batteries from smoke alarms
- Give OVH staff and / or its contractors access to carry out fire related maintenance (i.e. periodic electrical testing, sprinkler maintenance, fire door checks)
- Not tamper with 'fire safety' measures and / or fittings and report to OVH any associated problems or damage (e.g. never disconnect fire door closures, interfere with signage, smoke / heat detectors, lighting etc.)
- Always use electrical appliances and chargers marked with British or European safety mark and ensure they are purchased from a reputable sources
- At all times switch off appliances at the socket when not in use unless they are designed to be left on
- Not to smoke in communal areas and in general taking care when smoking i.e. avoid smoking in bed and never leave a lit cigarette unattended
- Keep escape routes and communal areas clear and free from obstacles to ensure people can get out of the building quickly
- Not use or store compressed gas within their home or any communal areas. If a customer is required to use or store compressed gas for medical reasons (i.e. oxygen), they must contact OVH immediately
- All shop Leaseholders must comply with requirements of legislation as per lease agreements and corresponding safety advice

### 3.4

<p>3.4.1</p> <p>3.4.2</p> <p>3.5</p> <p>3.5.1</p>	<p><b>Fire Safety Management Plan</b></p> <p>As a partner of the Sovini Group, OVH will deliver this Policy and the above commitments in accordance with the Fire Safety Management Plan developed for all companies in the Group.</p> <p>The Building Safety &amp; Compliance Manager will have responsibility for monitoring the Group Fire Safety Management Plan and effectiveness of its implementation.</p> <p><b>Building Design</b></p> <p>OVH will ensure that designs for new build and any refurbishment or alteration of properties it controls and manages meets all current legislative and regulatory requirements in fire safety.</p>
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**4 Implementation**

<p>4.1</p> <p>4.1.1</p> <p>4.1.2</p> <p>4.1.3</p>	<p><b>Structure and responsibilities</b></p> <p>The Responsible Person for OVH with support from the Building Safety &amp; Compliance Manager will ensure fire safety management system requirements are established, implemented and are performing to requirements.</p> <p>Tasks will be allocated to the OVH personnel who manage, perform and verify activities having an effect on the fire risks of OVH’s activities, facilities and processes.</p> <p>The responsibilities of the OVH personnel, who manage, perform and verify activities having an effect on the fire risks of OVH’s activities, facilities and processes are set out in the tables below:</p> <table border="1" data-bbox="255 1153 1500 1948"> <thead> <tr> <th>Type of Premises</th> <th>Fire Risk Assessment (Full)</th> <th>Fire Risk Assessment (Review)</th> <th>Monitoring of Fire Safety Controls</th> </tr> </thead> <tbody> <tr> <td>High Rise</td> <td>Fire Safety Consultant</td> <td>Fire Safety Consultant</td> <td>Neighbourhood Services Team / Building Safety &amp; Compliance Team</td> </tr> <tr> <td>Low Rise</td> <td>Fire Safety Consultant</td> <td>Fire Safety Consultant</td> <td>Neighbourhood Services Team / Independent Living Team/ Building Safety &amp; Compliance Team</td> </tr> <tr> <td>Independent Living Scheme</td> <td>Fire Safety Consultant</td> <td>Fire Safety Consultant</td> <td>Independent Living Team / Building Safety &amp; Compliance Team</td> </tr> <tr> <td>OVH Offices</td> <td>Fire Safety Consultant</td> <td>Fire Safety Consultant</td> <td>On-Site Manager / Building Safety &amp; Compliance Team</td> </tr> <tr> <td>Void Properties</td> <td>Property Surveyors</td> <td>Property Surveyors</td> <td>Property Surveyors / Building Safety &amp; Compliance Team</td> </tr> <tr> <td>Vacant Commercial Premises</td> <td>Fire Safety Consultant</td> <td>Fire Safety Consultant</td> <td>Building Safety &amp; Compliance Team / Commercial Housing Team</td> </tr> </tbody> </table>	Type of Premises	Fire Risk Assessment (Full)	Fire Risk Assessment (Review)	Monitoring of Fire Safety Controls	High Rise	Fire Safety Consultant	Fire Safety Consultant	Neighbourhood Services Team / Building Safety & Compliance Team	Low Rise	Fire Safety Consultant	Fire Safety Consultant	Neighbourhood Services Team / Independent Living Team/ Building Safety & Compliance Team	Independent Living Scheme	Fire Safety Consultant	Fire Safety Consultant	Independent Living Team / Building Safety & Compliance Team	OVH Offices	Fire Safety Consultant	Fire Safety Consultant	On-Site Manager / Building Safety & Compliance Team	Void Properties	Property Surveyors	Property Surveyors	Property Surveyors / Building Safety & Compliance Team	Vacant Commercial Premises	Fire Safety Consultant	Fire Safety Consultant	Building Safety & Compliance Team / Commercial Housing Team
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Routine auditing & Inspection	Building Safety & Compliance Team, Neighbourhood Services Team, Independent Leaving Team
Management of contractors	Project Managers / Health and Safety Team / Relevant Managers / Building Safety & Compliance Team
Monitoring of contractors during on-site operations	All Staff
Communication, consultation and co-ordination with authorities	Building Safety & Compliance Team
Fire risk assessments	Carried out by a nominated Competent Person(s)

## 4.2 Training, awareness and competence

4.2.1 OVH will implement, manage and monitor adequate fire safety training to all staff to ensure compliance with the RRO. Fire safety training will be provided:

- *(1 a) at the time when they are first employed; and*
- *(1 b) on their being exposed to new or increased risks because of –*
  - *their being transferred or given a change of responsibilities within the responsible person’s undertaking;*
  - *the introduction of new work equipment into, or a change respecting work equipment already in use within, the responsible person’s undertaking;*
  - *the introduction of new technology into the responsible person’s undertaking; or*
  - *the introduction of a new system of work into, or a change respecting a system of work already in use within, the responsible person’s undertaking*
- *(2) The training referred to in paragraph (1) must-*
  - *Include suitable and sufficient instruction and training on the appropriate precautions and actions to be taken by the employee in order to safeguard himself and other relevant persons on the premises*
  - *be repeated periodically where appropriate;*
  - *be adapted to take account of any new or changed risks to the safety of the employees concerned*
  - *be provided in a manner appropriate to the risk identified by the risk assessment ; and*
  - *take place during working hours*

4.2.2 All training that meets the above criteria will be structured in such a way as to assess the resulting levels of competency at the point of delivery.

## 4.3 Communication

4.3.1 OVH will provide employees, visitors and all other interested parties that visit OVH premises with comprehensive and relevant information in regard to fire safety via the display of appropriate fire safety signage and notices.

4.3.2 OVH will promote fire safety awareness to tenants and leaseholders via appropriate communication channels including but not inclusive of OVH website, newsletters and Information leaflets.

4.3.3 For all multi-occupied residential buildings with two or more sets of domestic premises, OVH will provide relevant fire safety instructions to tenants, including how to report a fire and what

occupants should do in the event of an evacuation. In addition, we will provide information relating to the importance of fire doors in fire safety.

#### 4.4 **Documentation**

4.4.1 OVH will ensure that all documentation effecting the fire safety of employees is available in its most current version by the electronic means in the document control system and in accordance with ISO 9001 provisions.

4.4.2 OVH will ensure all fire safety information effecting its activities is available in its most current version via OVH Website.

#### 4.4.3 **Document and data control**

4.4.3.1 OVH will develop written procedures to define the controls for the identification, approval, issue, removal and disposal of fire safety documentation, together with the control of fire safety data in accordance with ISO 9001 provisions and Data Protection Requirements.

#### 4.5 **Operational control**

4.5.1 Through periodic audit and authorised change requests, OVH will constantly monitor and update the procedures relating to fire safety. The procedures will be accessible to all staff via a document control system and to all other interested parties on request.

4.5.6 In addition to the operational procedures for fire safety and risk assessment within OVH premises, provision will be made for:

- Situations where fire risks extend into other external party premises or areas of control

#### 4.6 **Emergency preparedness and response**

4.6.1 OVH will establish and maintain plans as well as procedures to identify the potential for and responses to, incidents including emergency situations in order to prevent or mitigate the likely illness and injury that may be associated with fires. OVH will ensure appropriate provisions are in place for:

- Preparing a fire safety management plan for preventing or controlling the risk of fire within all areas of OVH properties where it has legal responsibilities
- Carrying out all necessary planned and reactive maintenance to building fabric, furniture, fixtures, fittings, equipment, mechanical and electrical systems as may be required for fire prevention or as fire precautions, including but not limited to means of escape, means or warning, fire detection, fire suppression, firefighting and fire containment in accordance with the relevant British Standard / Code of Practice using qualified and competent contractors
- Ensuring emergency equipment is provided in adequate quantities
- Implementing a fire risk assessment-based regime that takes action to prevent future fires and protect against death and injury, ensuring that routes to emergency exits from premises and the exits themselves are kept clear at all times
- Maintaining adequate insurance cover and legal fire safety arrangements in relation to property maintenance, automatic fire detection, firefighting equipment and warning systems



	<ul style="list-style-type: none"> <li>• Implementing ongoing fire safety training, evacuation procedures and awareness programmes for staff</li> <li>• Ensuring effective liaison with the local fire authority and where practicable involving the emergency services in practice drills</li> </ul>
4.7	<b>Communal Areas Responsibilities</b>
4.7.1	Those living in OVH buildings with shared communal areas, must not store or recharge mobility scooters or any other electrical device in any internal or external communal areas unless they are specifically provided and approved for this use (for more information, please refer to the OVH Mobility Scooters in Communal Areas Policy).
4.7.2	Residents should also ensure communal passageways are free from personal affects and possessions that hinder fire retardation measures and / or present an obstacle in the event of emergency evacuation of buildings (For further information see OVH Communal Areas Policy and Mobility Scooters in Communal Areas Policy).
4.8	<b>Performance measurement and monitoring</b>
4.8.1	OVH will have in place a reactive monitoring system to investigate, analyse and record occupational health and safety management system failures, including accidents, incidents (including near misses), ill health and property damage cases.
4.8.2	OVH will operate a system for recording and reporting of non-conformance including remedial actions.
4.9	<b>Audit</b>
4.9.1	OVH will ensure the regular review and auditing of fire safety management arrangements, with results reported to the Risk Assurance Committee and OVH Board.
<b>5</b>	<b>Performance</b>
5.1	The Building Safety & Compliance Team will report to the relevant fire authorities and internally to OVH Board and Executive Management Team on any significant fire incidents and OVH's response in areas where it has a responsibility.
5.2	PCHA have a target to ensure fire risk assessments are completed/reviewed in line with required frequencies.
<b>6</b>	<b>Consultation</b>
6.1	The Tenant Policy Review Group will be consulted in the development of this Policy. All staff were consulted in the development of this Policy.
<b>7</b>	<b>Review</b>
7.1	The Policy will be reviewed every Three Years (from the date of Executive Management Team's –EMT Approval) to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on the fire safety obligations of OVH, changes to OVH business practices or in the light of management system audits.

<b>8</b>		
<b>Equality Impact Assessment</b>		
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes
8.2	When was EIA conducted and by who?	A full EIA was conducted by the Policy and Strategy Manager and the Buildings and Safety Compliance Manager in January 2024
8.3	Results of EIA	Although the EIA indicated there may be differential impacts for elderly and / or disabled tenants, the system OVH has in place for carrying out risk assessments is designed to ensure all tenants are protected from the dangers and risks of fire regardless of protected characteristics.
<b>9</b>		
<b>Scheme of Delegation</b>		
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	EMT
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Operations Director- Assets and Compliance
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director- Assets and Compliance

Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
9 <sup>th</sup> April 2022	In line with the Review Schedule	See section 6	<ul style="list-style-type: none"> <li>• Change at 1.3- inclusion of the following:               <ul style="list-style-type: none"> <li>○ Health and Safety (Safety Signs and Signals) Regulations,1996</li> <li>○ Furniture and Furnishings (Fire Safety) Regulations 1988 (amended 1989.1993 and 2010)</li> </ul> </li> <li>• Change at 3.3.1- Inclusion that all shop Leaseholders must comply with requirements of legislation as per lease agreement and corresponding safety advice</li> <li>• Change at 4.1.1 – inclusion that the Building and Fire Safety Manager will support the ‘Responsible Person’ to ensure that fire safety management system requirements are established, implemented and are performing to requirements</li> <li>• Change at 4.1.3: -Inclusion of the Building and Fire Safety Team to the list of OVH personnel who monitor fire safety controls</li> <li>• Change at 4.9.1- Reworded that ‘OVH have internal audit process in place for checking fire safety in communal and service areas.’</li> </ul>
17 <sup>th</sup> January 2023	In line with the Review Schedule	See section 6	<ul style="list-style-type: none"> <li>• Change at 3.2- Addition of revised OVH commitments</li> <li>• Change at 4.1.3- Removed the Health and Safety Team form the list of personnel who manage, perform and verify activities which have an effect on the fire risks</li> </ul>

			<ul style="list-style-type: none"> <li>• Change at 4.3.3- Included that OVH will provide relevant fire safety instructions to tenants at all multi-occupied residential buildings with two or more sets of domestic premises</li> </ul>
20 <sup>th</sup> February 2024	In line with the Review Schedule	See section 6	<ul style="list-style-type: none"> <li>• Relevant legislation updated at 1.3</li> <li>• Change of job titles to reflect operational responsibilities updated throughout</li> <li>• Inclusion of new clause at 4.9 re: Audit function</li> <li>• EIA Updated at Section 8</li> <li>• In line with Board approved procedure the review period for this Policy has been extended to every Three Years, rather than annually</li> </ul>