

LFRS HMO Risk-Based Approach

Resourcing to Risk

- Lancashire has over 68,000 regulated premises.
- Protection Resource of 45 level 3, 4 and 5 green and grey book staff
- Three-year RBIP comprises **5085 high/very high-risk** premises. It is accepted that there is an anomaly rate in the Ordnance Survey data of around 10-15%, therefore it is likely that this figure equates to **c.4500** premises.
- A fully established and qualified (level 4) Protection establishment provides capacity for up to 3000 audits per annum. With a typical intervention frequency of three years the objective is to undertake 1500 high risk audits per annum from the RBIP to ensure the programme is completed in a three-year period.

Lead Authorities and Dual Regulation

Type of premises Shaded section indicates premises covered by the Regulatory Reform (Fire Safety) Order 2005	Lead Authority
Single dwellings	Local Housing Authority
Shared Houses	Local Housing Authority
All House in Multiple Occupation (HMO) whether or not subject to mandatory, selective or additional licensing	Local Housing Authority
All self-contained flats, whether purpose built or converted	Local Housing Authority
Premises with mixed commercial and associated residential accommodation and sheltered housing	Fire Authority
Hostels/B&B/Hotels	Fire Authority
Accommodation owned or managed by the Local Housing Authority	Fire Authority

HMO Definition and Risk

Your home is a house in multiple occupation (HMO) if both of the following apply:

- at least 3 tenants live there, forming more than 1 household
- you share toilet, bathroom or kitchen facilities with other tenants

Your home is a large HMO if both of the following apply:

- at least 5 tenants live there, forming more than 1 household
- you share toilet, bathroom or kitchen facilities with other tenants

LFRS Data on HMOs Approx. Volumes

Fire Safety Area	Below 3 Storey	3 - 6 Storey
Eastern and Pennine	167	4
Northern and Western	247	30
Southern and Central	772	18

This data is based on local authority custodian data sources

LFRS Primary Fires in HMOs 2021-2025

Property type 3	2021	2022	2023	2024	2025	Total	%
Licensed HMO	20	9	17	23	10	79	63.2%
Unknown if licensed HMO	10	5	8	8	10	41	32.8%
Unlicensed HMO	2	2		1		5	4.0%
Total	32	16	25	32	20	125	
	25.6%	12.8%	20.0%	25.6%	16.0%		

Regulatory Action since 2021

Satisfactory Audits	80
Unsatisfactory Audits	1109
Total Audits	1189
Enforcements	103
Prem w/ Enforcements	81
Alterations	46
Prem w/ Alterations	28
Prohibitions	7
Prem w/ Prohibitions	7

'Prem w/' is the number of premises that have had a notice (as we often issue to more than one RP)

HMO Risk Growth

- Housing Authorities experiencing exponential growth in 3-4 person HMOs as they fall outside Licensing scope.
- Many being bought by investors (who live remote) capitalising on relatively low property prices and no permission or need to inform LA before they operate which makes true volume and risk tracking difficult.
- Used as 'supported accommodation' for tenants with a variety of backgrounds (and vulnerabilities/dependencies), as this usage attracts significantly higher rates of payments, so it is an extremely lucrative source of income for the providers and the owners who lease them out.

A Collaborative Approach

- MoU with all LA Housing
- Selective Licensing Initiatives to target HMOs and Rogue Landlords
- Information sharing on risks
- Multi-agency interventions and joint enforcements utilising most effective regulatory powers
- RBIP proactively targeting higher risk HMOs as per MOU (generally 3 storeys plus and more complex layouts)
- LFRS attend pan-Lancashire housing leads forum
- Continual signposting/ safeguarding – HFSC/ BFSC
- LFRS leading nationally on improving premises risk data with local custodians and introduction of digital override table.



Memorandum of Understanding between Lancashire Fire and Rescue Service (LFRS) and Blackburn with Darwen Borough Council, Improving fire safety in residential premises.

Questions