



## **Ministry of Housing, Communities and Local Government**

### **Domestic smoke and carbon monoxide alarms: proposals to extend regulations Submission from CIBSE**

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## THE RESPONDENT

### The Chartered Institution of Building Services Engineers (CIBSE)

The Chartered Institution of Building Services Engineers, CIBSE, is the professional engineering institution that exists to 'support the Science, Art and Practice of building services engineering, by providing our members and the public with first class information'

CIBSE members are engineers who design, install, operate, maintain and refurbish life safety and energy using systems installed in buildings. CIBSE is unusual amongst built environment professional bodies because it embraces design professionals and also installers and manufacturers and those who operate and maintain engineering systems in buildings, with an interest throughout the life cycle of buildings.

CIBSE has over 20,000 members, with around 75% operating in the UK and many of the remainder in the Gulf, Hong Kong and Australasia. CIBSE is the sixth largest professional engineering Institution, and along with the Institution of Structural Engineers is the largest dedicated to engineering in the built environment.

CIBSE publishes Guidance and Codes providing best practice advice and internationally recognised as authoritative. The CIBSE Knowledge Portal makes our Guidance available online to all CIBSE members, and is the leading systematic engineering resource for the building services sector. It is used regularly by our members to access the latest guidance material for the profession. Currently we have users in over 170 countries, demonstrating the world leading position of UK engineering expertise in this field.

## CONSULTATION RESPONSE

### Part A: Smoke alarms in rented homes

**Q1: Do you support the proposal to extend the smoke alarm requirements as set out in the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 to the social rented sector?**

a. Yes

**Q2: Please give your reasons.**

A. We support the proposals for their potential to save lives

**Q3: Do you think that the guidance on where smoke alarms should be situated requires updating?**

a. Yes

**Q4: Please give your reasons.**

A. For alarms to be effective they need to be correctly placed and the guidance on how to do this should be up to date and informed by the best available knowledge on alarm placement.

**Q5: Do you agree with the proposal that landlords should not be required to test smoke alarms during the life of the tenancy?**

a. Yes

**Q6: Please give your reasons.**

A. Landlords cannot reasonably be expected to conduct monthly testing and as the consultation suggests it is not unreasonable to expect tenants to do this. There may be scope for annual electrical or gas safety checks to be extended to cover alarm testing, but that would need to be reviewed with the relevant regulatory and trade bodies.

**Q7: Please provide examples of how social landlords could best support residents to test their smoke alarms regularly and safely.**

A. This is not an area of expertise for CIBSE.

**Q8: Do you agree with our proposal that legislation be amended to create an obligation for social landlords to repair or replace smoke alarms, once informed that they are faulty?**

a. Yes

**Q9: Please give your reasons.**

A. This is the only effective way to maintain consistent standards across the stock. Some consideration may need to be given to cases where tenants require multiple repairs and replacements.

**Q10: Do you agree with our proposal that legislation be amended to create an obligation for private landlords to replace alarms once informed that they are faulty?**

a. Yes

**Q11: Please give your reasons.**

A. This is the only effective way to maintain consistent standards across the stock. Some consideration may need to be given to cases where tenants require multiple repairs and replacements.

**Q12: Do you agree with our proposal to update our guidance document to ensure the choice of alarm meets relevant product standards?**

b. No

**Q13: Please give your reasons.**

A guidance document will ensure nothing. If it is appropriate for alarms to meet certain product standards then that requirement should be regulated. Even then there will be a need for compliance to be checked in PRS tenancies.

**Q14: Do you support the proposal to commence the regulations as soon as practicable following the laying of regulations?**

a. Yes

**Q15: Please give your reasons.**

There is no reasonable case for delaying.

**Q16 For local authorities only: What additional operational or financial burdens do you consider would be placed on you by enforcing our proposals on smoke alarms? Please provide any costings to support your answer.**

N/A

**Part B: Carbon monoxide alarms upon installation of combustion appliances**

**Q17: Do you support the proposal to amend the statutory guidance (Approved Document J) supporting Part J of the Building Regulations to require carbon monoxide alarms to be fitted alongside the installation of fixed combustion appliances of any fuel type (excluding gas cookers)?**

a. Yes

**Q18: Please give your reasons.**

A. Because it is a cost effective and simple measure to save lives and reduce hospital admissions.

**Q19: Do you think that the guidance in Approved Document J on where carbon monoxide alarms should be situated requires updating?**

a. Yes

**Q20: Please give your reasons.**

A. It should certainly be reviewed for consistency with the latest standards and good practice guidance.

**Q21: Do you think that the guidance in Approved Document J on what type of carbon monoxide alarm should be installed requires updating?**

a. Yes

**Q22: Please give your reasons.**

A. It should certainly be reviewed for consistency with the latest standards and good practice guidance.

## **Part C: Carbon monoxide alarms in rented homes**

**Q23: Do you support the proposal to amend the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 to require private landlords and social landlords to install a carbon monoxide alarm in any room used as living accommodation where a fixed combustion appliance of any fuel type (excluding gas cookers) is used?**

a. Yes

**Q24: Please give your reasons.**

A. Because it is a cost effective and simple measure to save lives and reduce hospital admissions.

**Q25: Do you think that the guidance on where carbon monoxide alarms should be situated requires updating?**

a. Yes

**Q26: Please give your reasons.**

A. It should certainly be reviewed for consistency with the latest standards and good practice guidance.

**Q27: Do you agree with the proposal that landlords should not be required to test carbon monoxide alarms during the life of the tenancy?**

a. Yes

**Q28: Please give your reasons.**

A. It should certainly be reviewed for consistency with the latest standards and good practice guidance.

**Q29: Please provide examples of how landlords could best support residents to test their carbon monoxide alarms regularly and safely.**

A. This is not an area of primary expertise for the Institution

**Q30: We are proposing that legislation be amended to create an obligation for landlords to repair or replace carbon monoxide alarms, once informed that they are faulty. Do you agree?**

a. Yes

**Q31: Please give your reasons.**

A. This is the only effective way to maintain consistent standards across the stock. Some consideration may need to be given to cases where tenants require multiple repairs and replacements.

**Q32: Do you support the proposal to commence the requirements as soon as possible after laying amended carbon monoxide alarm regulations?**

a. Yes

**Q33: Please give your reasons.**

A. There is no reasonable case for delaying.

**Q34 For local housing authorities only: What additional operational and financial burdens do you consider would be placed on you by enforcing our proposals on carbon monoxide alarms? Please provide any costing to support your answer.**

**END**

Please do not hesitate to contact us for more information on this response.