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**Catalyst Response to the Domestic  
smoke and carbon monoxide alarms:  
proposals to extend regulations  
consultation**

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## 1. Overview

Catalyst is one of the UK's leading housing associations, owning and managing over 34,000 homes housing over 65,000 customers in London and the South East. We are a member of the G15 group of large London housing associations and Build East group of large developing housing associations in the East of England.

Our purpose is to provide homes people love, which includes taking the safety of our customers very seriously. We show this in new homes and our current homes by:

- Installing smoke and carbon monoxide alarms in all our tenants' homes where there is gas or solid fuel in line with industry best practice
- Testing smoke and carbon monoxide alarms before letting homes
- Giving new tenants information about smoke and carbon monoxide alarms to enable them to test them and report failures
- Replacing smoke and carbon monoxide alarms when tenants report failures.

We are delighted to have the opportunity to provide a response to this consultation on extending regulations for domestic smoke and carbon monoxide alarms.

If you have any questions or require further information on this response, please contact David Flindall, Policy Manager at [david.flindall@chg.org.uk](mailto:david.flindall@chg.org.uk).

## 2. General comments about the approach

We feel that all tenants have a right to expect to be safe in their homes. In line with our strategic objectives we only let homes that meet our quality requirements and provide an uncompromising level of safety.

We support the government's proposed approach for domestic smoke and carbon monoxide alarms. We think that it is reasonable to expect all landlords to supply working smoke and carbon monoxide alarms.

We already meet best practice requirements for supplying, fitting and replacing smoke and carbon monoxide alarms. We feel that our tenants have the right to homes that meet the highest safety standards and see no reason why there should be different criteria in different sectors.

We generally think that existing guidance is sufficient but would welcome a review of available products to take advantage of technological advances.

We agree that there should be an expectation that tenants monitor alarms and be expected to report non-working alarms. However, we feel guidance about how our most vulnerable customers, who may not be able to undertake checks, can be catered for would be useful.

## 3. Consultation questions with answers

**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.**

We have already made the decision to abide by these regulations as we feel that they are good practice that all responsible landlords should follow. We fit smoke alarms as standard and test them during gas and electrical safety tests.

We would not support extending these requirements to the homes of residents where we do not have a repairing responsibility, eg leaseholders and shared owners.

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

b. No

**Q4: Please give your reasons.**

We think that the current guidance is good and achieves its purpose in keeping tenants safe in their homes.

**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.**

We already test alarms as part of our annual gas safety check and five yearly electrical checks. However, monthly checks, in line with manufacturers' guidance, should be the tenant's responsibility.

Tenants can easily test smoke alarms as they are designed to be tested by householders. It is resource intensive for the landlord to test alarms in line with manufacturers' guidance, particularly gaining access to tenants' homes.

We would welcome guidance in the regulations to confirm that testing alarms is a tenant's responsibility.

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

Social landlords can support tenants by:

Making clear that testing alarms will keep them safe and that it is their responsibility to do so when starting a new tenancy

Demonstrating how to test alarms at the start of tenancies

Issuing guidance via leaflets, newsletters and the internet

Reminding tenants to test in mail outs, eg rent increases

Making information available on notice boards

Undertaking publicity campaigns to raise awareness of the danger that a faulty smoke alarm represents.

**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.**

Its good practice for a landlord to repair or replace a faulty alarm. Landlords have a duty of care to their tenants which we take very seriously.

We already repair or replace faulty alarms to make sure that our tenants, both in the home in which they are situated and in surrounding homes are able to safely enjoy their homes.

**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.**

Its good practice for a landlord to repair or replace a faulty alarm. Landlords have a duty of care to their tenants and should take that duty seriously.

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

a. Yes

**Q13: Please give your reasons.**

Guidance should reflect the best available products. Technological advances and other improvements mean that the choice of alarms is constantly improving, so guidance should be reviewed to reflect the current market to support landlords to provide the most appropriate alarms to meet the regulation's requirements.

**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.**

We feel that the regulations should be updated, and the extensions should be implemented as soon as possible to make sure that tenants are kept safe.

We are keen to support all practical measures to increase fire safety and make tenants safer.

**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.**

We support this proposal as it is good practice. Because it is good practice, we already do it.

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

b. No

**Q20: Please give your reasons.**

The current guidance does not need updating as it is still relevant.

**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.**

Guidance should reflect the best available products. Technological advances and other improvements mean that the choice of alarms is constantly improving, so guidance should be reviewed to reflect the current market.

**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.**

We think that it is a good idea to extend these regulations as that will make tenants safer. We already 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 because we feel that it is good practice.

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

b. No

**Q26: Please give your reasons.**

The current guidance does not need updating as it is still relevant.

**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.**

We already test alarms as part of our annual gas safety check and five yearly electrical checks. Monthly checks, in line with manufacturers' guidance, should be the tenant's responsibility.

Tenants can easily test smoke alarms as they are designed to be tested by householders. It is resource intensive for the landlord to test alarms on in line with manufacturers' guidance, particularly gaining access to tenants' homes.

We would welcome guidance in the regulations to say that testing alarms is a tenant's responsibility.

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

Social landlords can support tenants by

Making clear that testing alarms will keep them safe and that it is their responsibility to do so when starting a new tenancy

Demonstrating how to test alarms at the start of tenancies

Issuing guidance via leaflets, newsletters and the internet

Reminding tenants to test in mail outs, eg rent increases

Making information available on notice boards

Using operatives undertaking landlord safety checks to remind tenants

Undertaking publicity campaigns to raise awareness of the dangers of carbon monoxide.

**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.**

Its good practice for a landlord to repair or replace a faulty alarm. Landlords have a duty of care to their tenants and should take that duty seriously.

We have already considered our duty to keep tenants safe and decided to repair or replace alarms where we have been informed that they are faulty.

**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.**

Because its safety related, we think it should be done as soon as possible.