

Smoke and Carbon Monoxide (CO) Policy

Document Owner	Head of Property Safety
Prepared by	Lysa Nicely
Approved by	Directors Group
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Date of next review	February 2028
Monitoring, Auditing and Reporting	<ol style="list-style-type: none"> 1. Performance Indicators are included within the KPI suite relating to Smoke and CO detectors. 2. ISO 9001 certification (when achieved) by the Property Safety Team 3. Internal Audit of the gas service and CO data

1. Scope and Aims

1.1. This policy outlines how Hexagon Housing Association (Hexagon) will approach the management of smoke detection and carbon monoxide (CO) detectors within their homes. Through the implementation of this policy, we will ensure we:

- Comply with our legal duties relating to smoke and carbon monoxide alarm safety, including under the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, the Housing Act 2004, the Fire Safety Act 2021, and the Building Safety Act 2022.
- Take reasonably practicable steps to protect residents, employees, contractors, and others affected by our work activities, from the hazards of smoke and carbon monoxide.
- Demonstrate the ongoing safety of our homes is being managed effectively.

1.2. The aim of the policy is to ensure a programme of inspection is in place which ensures that Hexagon meets its regulatory requirements under the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022.

1.3. This document covers how Hexagon will manage its smoke and carbon monoxide alarm responsibilities in tenant's homes. These regulations do not apply to owner occupiers living in shared-ownership homes.

2. Equality and Diversity

2.1. Following a personalised fire risk assessment residents with disabilities, especially those with sensory impairments, cognitive disabilities, or mobility issues, the installation of customized smoke and CO detectors is essential. Tailoring detection systems to meet their specific needs can significantly reduce the overall risk during emergencies, providing an effective solution to mitigate potential hazards.

2.2. Hexagon will identify those residents who need adaptive equipment through varying channels such as tenancy sign-ups and audits, we will ask residents about their needs and install specialist alarms where needed, such as vibration or flashing lights (as opposed to by sound alerts). We will also identify residents through self-referral and external agency referral. This will be recorded in a Person-Centred Fire Risk Assessment (PCFRA).

2.3. Hexagon aims to understand the diverse needs of residents and deliver fair and equitable outcomes under this policy. We commit to considering reasonable adjustments in the delivery of our services to accommodate the diverse needs of residents and their household members.

2.4. An equality and diversity impact assessment has been carried out and is attached as an appendix to this Policy.

3. Resident Consultation

3.1. The Resident repairs group will be consulted on this policy on the 24 February and their feedback will be incorporated into this policy.

4. Policy Statement

4.1. Smoke and Carbon Monoxide alarm installation is an important obligation for all Landlords.

4.2. We fulfil our obligations by being committed to taking all reasonable steps to manage installations, repairs or replacements of alarms when informed or found faulty or expired in accordance with the relevant legislation and guidance.

4.3. We will install CO detectors in the room of every room with a gas boiler or a solid fuel burning appliance. Through our annual gas check (LGSR) we will check functionality and record on the annual gas check certificate. In addition, we will also check on our five yearly electrical inspection programme and ensure that all detection is hardwired by 2030

4.4. We will ensure a smoke alarm is installed on every storey within our residents' homes and through our electrical inspection programme we will ensure these are hard wired by 2030.

4.5. We will implement arrangements for the management of smoke and carbon monoxide alarm safety that complies with our statutory duties. Where reasonably practicable, we will meet any good practice recommendations.

4.6. We are committed to engaging with residents and stakeholders and will use a range of communication methods to consult with, listen to and promote awareness to ensure they are safe, and feel safe in their homes.

4.7. We will Install mains powered alarms ('hard-wired') or provide battery powered on a temporary basis. All alarms will be installed based on the needs of the building, the Residents and will be compliant with British Standards BS 5839-6 and BS 50291.

4.8. All contractors procured and appointed to install hard wired smoke and CO alarms are registered with an approved contractor scheme. Our preferred scheme is the National Inspection Council for Electrical Installation Contracting (NICEIC). Only people with the relevant knowledge, skills, experience, and training will carry out work on the Smoke and CO installations that we are responsible for.

5. Monitoring and Review

5.1. We will:

- 5.1.1. Undertake active monitoring tasks to ensure the integrity of data held in our compliance system and to ensure compliance with the standards set out in the policy.
- 5.1.2. Report and monitor monthly performance related to smoke and CO data through key performance indicators as determined by our Executive Team and the Board.
- 5.1.3. Report or escalate incidents of non-compliance to the Executive Team as appropriate.
- 5.1.4. Undertake periodic third-party quality checks on smoke and CO alarm installations carried out on programmes of work. Any issues found will be monitored by Hexagon until they are completed. Any issues not completed will be escalated accordingly.

5.2. KPIs will be reported to the Hexagon Directors Group monthly for learning and oversight, and performance against targets will be benchmarked against other organisations within the sector.

6. Data Protection

- 6.1. This Policy will be enacted in line with our Data Protection framework, and in line with the UK GDPR and Data Protection Act 2018.
- 6.2. Under this policy, personal data may be shared with our Gas and Electrical Servicing Contractors for delivering the obligations set out in this policy. A Data Protection Impact Assessment has been completed, and approved by the Data Protection Officer, and a Data Sharing Agreement is in place with the two above contractors.
- 6.3. Under this policy, personal data including contact details may be collected for gaining access to tenant's properties to meet our obligations set out in this policy. This data will be subject to a retention period of; the duration of the tenancy – plus any time when former tenant arrears is owed, and this has been logged on Hexagon's Record of Processing Activities.
- 6.4. The Data Process Owner of the personal data processed under this policy is the Head of Property Safety. The Data Process Owner is responsible for ensuring that the personal data is processed in line with Hexagon's Data Protection Framework.

6.5. If you want more information about how your personal data is processed under this policy, please contact our data protection team at dprotection@hexagon.org.uk or call our office.

7. Legal Framework

- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Building Safety Act 2022
- Fire Safety Act 2021
- BS 5839-6 2019+A1:2020
- Electricity at Work Regulations 1989
- BS 7671 – 18th Edition Wiring Regulations
- Housing Act 1998
- Management of Health and Safety at Work Regulations 1999
- Defective Premises Act 1972
- Landlord and Tenant Act 1985
- Housing Health and Safety Rating System – Housing Act 2004
- Homes (Fitness for Human Habitation) Act 2018

8. Related Hexagon policies

- Vulnerable Residents and Reasonable Adjustments Policy
- Gas Safety Procedure
- Electrical Safety Policy and procedure

Appendix 1: Equality Impact Assessment

Hexagon's Vulnerable Residents and Reasonable Adjustments Policy commits the organisation to understanding the diverse needs of residents and, where there are any barriers to accessing the service or any disproportionate negative impact, considering reasonable adjustments to ensure a fair and equitable outcome for all residents.

Hexagon recognises that responding and reacting to the changing needs of residents requires a willingness to do things differently and find individual solutions to ensure equitable access to our services for all. The following table will propose how we will adjust the service to account for possible requirements of different groups, to help us to prepare for these expected needs. However, we recognise that we cannot anticipate every need and that there is not a one-size-fits-all solution to all needs, so we will continue to be responsive and flexible in adapting to the diverse needs of residents in enacting this policy.

See the Vulnerable Residents and Reasonable Adjustments Policy for examples of Reasonable Adjustments we will consider. When considering what is reasonable, we will take into account: The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the person with a disability; The practicality of us making the adjustments; The availability of our resources, including external assistance and finance; Any disruption to the service that making the adjustment may cause.

Characteristic	Impact	Explanation of Impact	Reasonable Adjustments Considered	Consideration of effectiveness, practicality, cost/availability of resources and any disruption to service	Decision on whether to implement the Reasonable Adjustment
Age	Positive	Where we have been made aware that standard alarms are not suitable for the household due to additional needs, including due to age related concerns, Hexagon will install specialist alarms.	Where relevant, we will install customised smoke and CO detectors tailored to meet the specific needs of tenants.		
Pregnancy/ Maternity	None	No impact identified			
Disability: Physical	Positive	For tenants with disabilities, especially those with sensory	Where we have been made aware, we will install	Whilst this may be an additional cost, the	Agreed

health and mobility		impairments, cognitive disabilities, or mobility issues, the installation of customized smoke and CO detectors is essential. Tailoring detection systems to meet their specific needs can significantly reduce the overall risk during emergencies, providing an effective solution to mitigate potential hazards.	customised smoke and CO detectors tailored to meet the specific needs of disabled tenants.	adjustment is effective and practical and will not disrupt the overall delivery of the service.	
Disability: Learning and neurodiversity	Positive	Standard alarms may not be suitable for neurodiverse tenants; tenants may need the alarm system to be explained in a way that is clear to them.	Where we have been made aware that the resident requires this, we will take extra time where required to explain the alarm system to tenants with additional needs; we will install customised smoke and CO detectors where needed.	This will require additional training for relevant contractors and staff and additional time. Whilst this may be an additional cost, the adjustment is effective and practical and will not disrupt the overall delivery of the service.	Agreed
Disability: Vision and hearing	Positive	Standard alarms may not be suitable for tenants who are deaf or hard of hearing.	Where we have been made aware that this is relevant, we will install customised smoke and CO detectors tailored to meet the specific needs of disabled tenants, such as alarms that alert by vibration or flashing lights rather than sound.	Whilst this may be an additional cost, the adjustment is effective and practical and will not disrupt the overall delivery of the service.	Agreed
Disability: Mental health	Positive	Standard alarms may not be suitable for tenants with certain mental health conditions who	Where we have been made aware that there is an impact on the tenant's mental health, we will		

		may require a tailored alarm system.	consider installing customised smoke and CO detectors.		
Sex	None	No impact identified			
Gender reassignment / Transgender / Non-binary	None	No impact identified			
Race or nationality.	None	No impact identified			
Religion or belief	Negative	When there is a religious requirement to refrain from using electricity on a day of rest, it is necessary to provide education and make individual arrangements with the affected tenant regarding smoke and CO detectors.	Considered	Due to the nature of life safety equipment, no physical modifications, or changes to working practices are possible. If religious beliefs are identified, residents will be informed of the safety requirements. They can make alternative arrangements if the alarms sound on their rest days.	None to be implemented
Sexual orientation	None	No impact identified			
Language	Positive	Where we have been made aware that the tenant has low or no English language proficiency and we need to communicate important information about smoke and	Translation of important communications regarding smoke and CO alarms upon request into any requested language	There will be a cost involved for the translation service, as well as staff time, however it is expected that this will be manageable	Agreed

		CO alarms, we will translate the information into their required language upon request.			
Literacy	Positive	Where important information about smoke or CO alarms is shared with tenants in writing and they let us know they have low or no literacy, we will explain the information verbally or in their requested format	If we have sent a paper letter and the tenant usually uses a screen reader, we will resend the information digitally (email/text/etc) or communicate the information verbally (phone call/in person/etc), upon request	We will choose the most practical and cost-efficient method to communicate that meets the tenant's needs; for example, a phone call or email may be more efficient than an in person visit	Agreed

Outcome

Where any negative impact is identified, have changes to the policy or sufficient reasonable adjustments been proposed to mitigate the impact?	
Yes, the only adjustment not agreed is in relation to any religious requirement to refrain from using electricity, as the safety implications to the residents and neighbours (and our legal duties) override this consideration.	
How will the reasonable adjustments be facilitated and communicated to residents?	
We will where possible identify tenants' needs through varying channels including reports from our contractors who frequently visit our Residents homes. We will also ensure we communicate with our Residents annually to ask they contact us if they have any additional support requirements.	
We will communicate through our website as well as Resident Newsletters	
What are the arrangements for monitoring and reporting on the impact on residents, the diverse needs of residents using the service, and the implementation of reasonable adjustments?	
The identification of the need for a Person-Centred Fire Risk Assessment (PCFRA) and the completion of the assessment and any required actions will be monitored and reported.	
A diversity impact assessment will be included in the Property Safety annual report.	
Are you satisfied that we have met our duties under the Equality Act 2010 and the Consumer Regulations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Name and Job Role:	Lysa Nicely Head of Property Safety