



Bristol City Council Housing and Landlord Services

Fire and Carbon Monoxide Detection Policy

Version 3.0

Approved by: DMT

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Date approved: 9/9/26

Date for Review: 3 years (2029) or less depending on legislation

Service Area: Housing Repairs and Maintenance

Classification: Compliance / Operational

History of most recent policy changes			
Date	Page	Change	Origin of change (e.g. legislation)
2014/2017	All	Policy Created 2014/Reviewed 2017	Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022: guidance for landlords and tenants - GOV.UK (www.gov.uk)
2024	All	More information on Carbon Monoxide responsibilities	

Contents

Definitions	2
1. Purpose	3
2. Scope.....	3
3. Aims and objectives	3
4. Roles and Responsibilities and Authority	4
5. The Policy	4
5.1 Legal and Regulatory Requirements	4
5.2 Supply	5
5.3 Testing	6
5.4 Void Properties.....	7
5.5 Records.....	7
5.6 Communication	7
5.7 Legal Context and Consumer Standards.....	7
5.8 Equality and Diversity.....	8
6. Quality Assurance	8
6.1 Publishing.....	8
6.2 Review	8
6.3 Monitoring and Reporting Requirements.....	8
7. Appendices	9
Appendix A – Roles and Responsibilities.....	9
Appendix B – Legal and Policy Context.....	10

Definitions

BCC	Bristol City Council.
D1, D2	The D category refers to how a fire alarm system is powered and its backup capabilities. There are two sub-categories D1 and D2. D1 systems have: • Mains-powered alarms with a tamper-proof / sealed long-life backup battery • Battery is typically 10-year sealed lithium • Cannot be removed by the tenant • Meets current best practice for rented housing D2 systems have: • At least one mains-powered alarm with back-up battery • Batteries (9 volt) need to be periodically removed and replaced by tenant
Detectors	Used on its own refers to both smoke and carbon monoxide detectors. Also known as alarms.
EICR	Electrical Installation Condition Report - a formal safety assessment of a property's fixed electrical system, checking for damage, wear and tear, and compliance with UK safety standards (BS 7671).
HHSRS	Housing Health and Safety Rating System - a risk-based tool used by local authorities in England and Wales to assess health and safety hazards in residential properties.
LD1, LD2, LD3	The LD category defines the extent of coverage a fire alarm system has within a home/property. There are three categories: LD1 - Highest level of protection • Detectors installed in all circulation spaces (hallways/landings) and • All rooms where a fire could start, except bathrooms. • This is the most comprehensive level. LD2 – Intermediate/standard level of protection • Detectors in circulation spaces (hallways, landings) • Plus high-risk rooms such as: ○ Kitchen ○ Lounge/living room ○ Any room with a fuel-burning appliance LD3 – Basic Protection • Covers circulation spaces (hallways, landings), alerting residents to fires which may block their exits
LGSR	Landlord Gas Safety Responsibilities - often called a CP12 certificate or gas safety certificate— proves that a Gas Safe registered engineer has checked the gas appliances, pipework, and flues in a rental property and found them safe.

SHOP	Supported Housing for Older People - housing specifically designed for older people who want to live independently.
Void	A home or building that is completely empty because no tenant is currently living in it.

1. Purpose

The purpose of this policy is to outline BCC's Housing Directorate's responsibility to fit, repair, maintain and replace smoke, heat and carbon monoxide detectors in BCC owned residential properties. BCC Housing Directorate will ensure that:

- there is a proactive approach to the free installation and replacement of smoke, heat, and carbon monoxide detectors for residents and;
- fulfil our obligations to keep residents informed about their responsibilities to test and maintain smoke, heat, and carbon monoxide detectors and;
- facilitate our programmes of installation, testing and maintenance.

2. Scope

This policy applies to the internal areas of all BCC Housing Directorate socially rented residential properties. This policy **does not** apply to:

- leaseholders or homeowners. Gas installations within leaseholder properties must be maintained in line with [the Gas Safety \(Installation and use\) Regulations 1998](#) – duties of Landlords (See [Gas Safety Policy](#))
- common or communal areas of blocks of flats, such as corridors or community rooms.
- plant room or lift motor rooms.
- communal Fire Alarm systems.

Alarms fitted in the communal areas of blocks of flats or plant/lift motor rooms etc are maintained separately in accordance with the [Regulatory Reform \(Fire Safety\) Order 2005 \(as amended\)](#) and the [Fire Safety \(England\) Regulations 2022](#) [See [Fire Safety Policy](#)]

3. Aims and objectives

The main aims of this policy are to:

- Ensure that resident's homes have compliant smoke, heat and carbon monoxide detectors in place.
- That appropriately qualified operatives fit and maintain the detectors.
- Certificates are generated and stored appropriately.

- That there is adequate information provided to the residents relating to their responsibilities to test detectors and BCC's legal responsibilities to fit, test and replace them, requiring access to the property.
- That specialist information and equipment is available to those who require it.
- That detectors are fitted and in working order at the start of every tenancy, are tested according to our programmes of work, and replaced at appropriate intervals depending on the model of detector.
- There are clear and easy instructions on how to report an issue regarding detectors and BCC respond in a timely manner.
- Comply with the Safety and Quality Consumer Standard to ensure we meet all regulatory requirements that relate to the health and safety of our residents in their homes and in communal areas.

4. Roles and Responsibilities and Authority

The Director of Housing and Landlord Services and the Head of Housing Repairs and Maintenance are responsible for the implementation of this policy. All staff and/or contractors involved in installing, testing, and maintaining smoke, heat or carbon monoxide detectors has responsibility for delivering this policy.

All housing staff are responsible for signposting tenants to relevant information and/or supporting tenants to report an issue with a heat or carbon monoxide detector. All housing staff are also responsible for referring any tenant with a hearing impairment or who are hard of hearing to Care Direct for specific smoke, heat, and carbon monoxide detectors to be installed.

A more detailed breakdown of roles and responsibilities is included as Appendix A.

5. The Policy

5.1 Legal and Regulatory Requirements

BCC Housing Directorate will take all practicable steps to ensure that smoke, heat and carbon monoxide alarms are installed, maintained, and remain in safe working order at all times. We will comply with all relevant legislation, regulations, and guidance.

Where a smoke, heat or carbon monoxide alarm is missing, defective, repeatedly failing, or otherwise presents a risk to health or safety this will be treated as a potential hazard under the [Housing Health and Safety Rating System \(HHSRS\)](#), as introduced by the [Housing Act 2004](#).

The [Smoke and Carbon Monoxide Alarm \(Amendment\) Regulations 2022](#) states that, as a landlord, BCC Housing Directorate must:

- Ensure at least one smoke alarm is equipped on each storey of their homes where there is a room used as living accommodation.
- Ensure a carbon monoxide alarm is equipped in any room used as living accommodation which contains a fixed combustion appliance (excluding gas cookers).

- Ensure smoke alarms and carbon monoxide alarms are repaired or replaced once informed and found that they are faulty.

However, BCC is committed to upgrading every property to meet the LD2 Standard or LD1 Standard for SHOP schemes (see Definitions section for details) in accordance with the British Standard – BS5839 which exceeds the minimum set out in regulation.

This means BCC will:

- ensure that all properties covered by this policy have smoke or heat detectors in all circulation areas that form part of the escape routes from the premises, and in all specified rooms or areas that present a high fire risk to occupants, including any kitchen and the principal habitable room. (LD2)
- or,
- A system installed throughout the premises, incorporating detectors in all circulation areas that form part of the escape routes from the premises, and in all rooms and areas, other than those with negligible sources of ignition, such as toilets, bathrooms and shower rooms (LD1).
 - ensure a 'a carbon monoxide alarm is equipped in **any room** of the premises that contains a fixed combustion appliance' (which includes any fuel burning appliance) (excludes gas cookers).
 - ensure that each prescribed alarm is equipped, therefore in proper working order on the day the tenancy begins if it is a new tenancy.

Smoke, heat and carbon monoxide alarm failures will be treated as emergency hazards. In line with the [Hazards in Social Housing \(Prescribed Requirements\) \(England\) Regulations 2025](#), BCC Housing Directorate will address requests for the repair or replacement of smoke, heat or carbon monoxide detectors within 24 hours.

5.2 Supply

BCC Housing Directorate will provide smoke, heat and carbon monoxide detectors free of charge to every property within its ownership and replace units wherever necessary.

Installation of smoke/heat detectors will comply with [Part P Building Regulations, IEE Regulations \(BS7671\) current amendment](#) issued by the Institute of Electrical Engineers and as per current social housing regulations.

Carbon monoxide detectors will be fitted by a qualified Gas Safe Registered engineer (See [Gas Safety Policy](#)) or will be upgraded to mains powered Carbon Monoxide alarms as part of electrical work where rewires are completed or smoke detection upgrades to LD2 or LD1 are undertaken.

BCC smoke/heat detector units are fitted by a 'competent person' as set out in [Part P Building Regulations](#). (See also [Electrical Safety Policy](#)).

As part of BCC work towards good practice, during an Electrical Installation Condition Report (EICR) inspection, if a smoke or heat detector is found to be faulty or out of date, a ten-year battery detector will be fitted as a minimum.

The ten-year smoke detector units do not have the facility to change batteries; therefore the resident does not have this responsibility. BCC will replace units before they expire in accordance with our Electrical Policy and procedures.

Where possible, smoke or heat detector would be upgraded from a ten-year battery device to a hard-wired unit in the following circumstances (not an exhaustive list):

- When a property is rewired.
- Major works that require an installation certificate for example, a new consumer unit.
- At void.
- Capital upgrade programmes agreed with Asset Management.

BCC install [Ei170RF RadioLINK](#) devices for residents who are hard of hearing/hearing impaired. These are compatible for all smoke, heat and carbon detection.

5.3 Testing

BCC is responsible for testing smoke, heat and carbon monoxide detectors. Smoke/heat detectors will be tested as part of the electrical testing programme - EICR.

Carbon monoxide detectors will be tested during annual gas servicing visits within properties that qualify / have gas installed.

Where detectors are found to be out of date or defective, they will be replaced. The presence and condition of detectors will be included in the Stock Condition Survey programme carried out by Asset Management team and a record kept. If the detector needs to be repaired or replaced, then a report will be made to the relevant department to address.

Where a detector of any kind is found to require repair or replacement by any BCC officer when present at the property, this is reported and actioned according to our processes.

If a detector is damaged and no longer working, residents are required to report this to BCC so a replacement or repair can be arranged. Replacements are made free of charge. How to report is set out on the [BCC website](#).

Residents are responsible for testing their smoke, heat and carbon monoxide detectors and replace batteries where possible. The expectation is that testing should be done monthly. If the resident has replaced the batteries and the detector does not work or they are unable to replace the batteries, a report to BCC must be made. BCC will provide and replace batteries or raise a repair or replace depending on the circumstances.

BCC will provide residents with information about their responsibilities to test, and the legal requirements of the council to maintain the detectors, requiring access to properties.

For a small number of properties that do not have a gas supply but do have a carbon monoxide detector (because of the presence of a fixed combustion device/ solid fuel burning device) BCC will keep a register of such properties and carry out annual checks.

5.4 Void Properties

When a property becomes void it is made ready for the next re-let. Part of this process includes ensuring that existing detectors are operational.

All void properties will be upgraded to LD2 or LD1 if a SHOP scheme and therefore hard-wired smoke/heat detector units will be installed. If there is a requirement for a Carbon Monoxide detector a hard-wired version will be supplied and replace the battery operated version to meet HHSRS guidance.

For properties that have gas supply, a gas safety check is carried out at all properties when they become void. A Pre and Post Gas Safety check will be carried out, to ensure that there is a safe working environment for the voids team and that following the void work the home is safe for the incoming tenant to move in. Carbon monoxide detectors are checked once a year in accordance with our annual gas safety programme.

For properties that do not have gas, but do have a fuel burning device, this will be reported by the surveyor and a request made for a qualified operative attend to test, install or replace a carbon monoxide detector.

5.5 Records

Records of EICRs, rewires, relets, containing fire detection information and smoke/ fire alarm installation certificates will be held against the individual asset in our compliance reporting software system – C365.

BCC retains all records of the annual LGSRs for a minimum of two years from the date of the certificate to ensure hard copies can be produced when required. These records contain locations of the CO detectors, as well as CO detector information being stored in the cloud storage system.

5.6 Communication

BCC will provide information relating to this policy on its Fire Safety web pages and in a leaflet. Residents will be issued with the Smoke Detector Leaflet at the commencement of their tenancy or when smoke detectors are changed/installed.

As noted, reports of need for repair or replacements of smoke, heat or carbon monoxide detectors will be classified as an Emergency Repair and addressed within 24 hours.

5.7 Legal Context and Consumer Standards

BCC's Housing Directorate will comply with the requirements of all relevant legislation. This includes:

- The Health and Safety at Work etc. Act 1974;
- The Regulatory Reform (Fire Safety) Order 2005;
- The Smoke and Carbon Monoxide Alarm (England) Regulations 2015;
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022; and

- The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (commonly referred to as Awaab's Law)

A more detailed list of legislation relevant to this policy is included as Appendix B.

This policy contributes to the [Social Housing \(Regulation\) Act 2023](#) and the associated [Regulatory Standards](#) by addressing the following requirements:

- **Safety and Quality Standard:** When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas.
- **Competence and Conduct Standard (forthcoming 2026):** which will set clear expectations for the qualifications, behaviours, and organizational culture among those working in social housing.

5.8 Equality and Diversity

BCC Housing Directorate recognises that some residents may be at increased risk of fire or carbon monoxide exposure due to vulnerability. Vulnerability may include, but is not limited to:

- Physical or sensory impairments.
- Mental health needs.
- Older age.
- Hoarding or self-neglect concerns.
- Language or communication barriers.

Where vulnerability is identified, BCC Housing Directorate will:

- Prioritise attendance and completion of works.
- Provide appropriate specialist equipment, such as [Ei170RF RadioLINK](#) devices, where required.
- Ensure any interim safety measures are proportionate and documented.
- Work collaboratively with Tenancy Management teams and other support services to gain access to hard to access properties.

6. Quality Assurance

6.1 Publishing

This policy will be published on the BCC Website and communicated to relevant operational teams via policy briefings and other appropriate communications.

6.2 Review

This policy will be reviewed in three years or sooner if there is a change to legal or regulatory requirements, in accordance with our procedures.

6.3 Monitoring and Reporting Requirements

Service delivery and performance is measured against the Housing and Landlord Services Performance Framework. This policy supports improved service standards

and therefore enhances compliance and performance metrics across the Housing and Landlord Services Performance Framework.

7. Appendices

Appendix A – Roles and Responsibilities

Job/Team Name	Description of responsibilities
Director of Housing and Landlord Services	Responsible for: Ensuring adequate resources and funding for the installation and replacement of smoke, heat, and carbon monoxide detectors
Head of Repairs and Maintenance and Head of Capital and Special Projects	Responsible for: Ensuring compliance with statutory requirements
Mechanical and Electrical (M&E) Compliance Lead	Responsible for: - Ensuring competent contractors are appointed. - Monitoring compliance and reporting findings.
Maintenance and Repairs - Maintenance contractor.	Responsible for: - Domestic electrical testing - Fitting 10-year battery life detectors - Only fitting detectors if found that there is no smoke detector or existing detector is out of date, damaged etc.
Response repairs	
Planned Programme contractor.	Responsible for: - Installing hard-wired smoke detector units - Any Planned Programmes - Kitchens and Rewires - Works that require an installation certificate. - Every void (as requires an installation certificate)
Response repairs Contractor (may also include direct labour ie. BCC staff)	
House Condition Inspectors (within Asset Management and Review)	As part of House Condition Inspection/Electrical Testing Programme, responsible for: - Inspecting the presence and condition of smoke detectors. - Ordering the replacement of a smoke detectors.
M&E Planned electrical testing.	
Response Gas and Domestic Heating Team	As part of gas servicing and domestic gas installation works/annual gas servicing, responsible for: Fitting, inspecting and/or replacing CO detectors.
Policy and Engagement Team	Responsible for: - Reviewing and updating policies and procedures - Monitoring and reporting on performance

Housing
Management and
Estates

Responsible for:

- Supporting delivery of programmes e.g., gain access to hard to access properties.

All BCC Housing staff Responsible for:

- Signposting tenants to relevant information and/or supporting tenants to report an issue with a smoke, heat or carbon monoxide detector.
- Referring tenants with hearing impairments to Care Direct for specific smoke, heat, and carbon monoxide detectors to be installed.

Appendix B – Legal and Policy Context

The following is not an exhaustive list, but legislation, regulations and standards relevant to this policy include:

External

- BS 5839-6: 2019+A1 2020
- BS 7671 – 18th Edition Wiring Regulations
- Building Regulations Part P (Electrical Safety)
- Building Safety Act 2022
- Combustion appliances and fuel storage systems: Approved Document J
- Data Protection Act 2018
- Defective Premises Act 1972
- Electricity at Work Regulations 1989
- Environmental Protection Act 1990
- Equality Act 2010
- Fire Safety (England) Regulations 2022
- Fire Safety: Approved Document B
- Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (Awaabs Law)
- Health and Safety at Work etc Act 1974
- Homes (Fitness for Human Habitation) Act 2018
- Housing Act 1988
- Housing Act 1998
- Housing Health and Safety Rating System – Housing Act 2004
- Management of Health and Safety at Work Regulations 1999
- Provisions and Use of Work Equipment Regulations 1998
- Regulatory Reform (Fire Safety) Order 2005 (the RRFSO)
- Social Housing (Regulation) Act 2023
- The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- The Smoke and Carbon Monoxide Alarm (England) Regulations 2015;
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

- Workplace (Health, Safety and Welfare) Regulations 1992

Internal

- Electrical Safety Policy
- Gas Safety and Service Policy
- Fire Safety Policy