

Classification: Public

Key Decision: No

Gravesham Borough Council

Report to: Cabinet

Date: 09 September 2019

Reporting officer: Daniel Killian, Assistant Director (Housing Assets)

Subject: Carbon Monoxide (CO) Dectectors in Council Owned Housing

Purpose and summary of report:

To inform Cabinet of the current legal position of CO detectors in Social Housing and to consider the proposal of installing CO detectors within all Gravesham Borough Council owned housing stock where a fuel burning appliance is installed.

Recommendations:

1. Cabinet approve the installation of CO detectors in all Gravesham Borough Council housing stock where a fuel burning appliance is installed.

1. Background

- 1.1 Gravesham Borough Council has a duty of care to its tenants to ensure that their health and safety is not put at risk through the use of its gas appliances and installations. The Council also has a responsibility under the Gas Safety (Installation and Use) Regulations 1998 which require landlords to adequately and competently install, maintain and service all gas installations, appliances, flues and installation pipe work under their liability, specifically installations within its housing stock.
- 1.2 Under current regulations in Scotland and Northern Ireland it is a requirement that all residential properties whether that be in the private rented sector or social housing sector have CO detectors installed anywhere a combustion appliance is installed. This includes all gas or solid fuel appliances.
- 1.3 However, in England the regulations are different and only apply to the private rented sector and not to social housing. The regulations in England require CO detectors to be installed in privately rented properties where solid fuel appliances are present. As gas is not a solid fuel there is no requirement to fit a CO detector near a gas boiler.
- 1.4 Therefore, although it is a legal requirement in Northern Ireland and Scotland for Social Housing Landlords to install CO detectors, it is not a legal requirement in England but this creates a situation where the authority (GBC) are exempt from

the legislation but can impose a fine of £5,000 where a private landlord fails to comply with the regulation.

2. Current Position

- 2.1 As a landlord, we currently install CO detectors as good practice where appliances are operating on solid fuel, which is a legal requirement in the private rented sector. Solid fuel poses a far greater risk of carbon monoxide poisoning as there is higher chance of incomplete combustion from these types of appliances. CO detectors have also been installed in our Sheltered Accommodation to help protect some of our more vulnerable residents and therefore, we have in the region of 5,000 properties that currently do not have CO detectors, as legally, we are not required to install them.
- 2.2 Gravesham Borough Council, as a landlord is legally responsible for the safety of their tenants in relation to gas safety. The Gas Safety (Installation and Use) Regulation (GSIUR) 1998, regulation 36 states that Landlords are required to:
- Repair and maintain gas pipework, flues and appliances in safe condition
 - Ensure a gas safety check on each appliance and flue is undertaken on intervals of no more than 12 months since it was last checked for safety
 - Keep a record of the safety check until two further checks have been carried out
 - Issue a copy of the latest check record to existing tenants within 28 days of the check been completed, or to any new tenant before they move in
- 2.3 Following approval by Management Team in November 2018, Gravesham has adopted an MOT style for compulsory Gas Servicing. The change gets its name from vehicle MOT servicing whereby the expiry date is fixed each year. This was introduced in April 2019 and by carrying out gas servicing in this way it will result in 855 fewer gas services being completed over a 12 month period which will save in the region of £50,000 per year.
- 2.4 Before the change to MOT style Gas Servicing (pre-April 2019), appointments with tenants were booked in 6-8 weeks before the service was due. This was to give us the best opportunity of ensuring access was obtained before the expiry date. However this meant the service was completed earlier every year and this became the new expiry date for the following year. Therefore, properties were serviced every 10/11 months which resulted in more gas services being carried out compared to the size of the housing stock.
- 2.5 The move to the new MOT style still requires us to arrange appointments 6-8 weeks before service expiry, but the original expiry date will always remain fixed which results in a reduced number of services and the savings identified in 2.3 above.
- 2.6 In addition to this, the Compliance & Projects Manager has been proactively working with Swale Heating to re-profile the gas servicing programme by postcode area. This means that our contractor is able to complete more services each day because of the close proximity of the properties. After the initial set-up cost of £22,000 for re-profiling the gas servicing programme in the first year, the financial saving over the next 9 years of the contract will return a saving of £11,000 per year.

- 2.7 The recent re-procurement of the Gas installations, repairs, and servicing and maintenance contract has seen GBC achieve a more competitive price on boiler replacement against original estimates.
- 2.8 The efficiencies that have been realised through the changes referred to within Section 2 of this report will generate sufficient budgetary savings that would enable the implementation of a CO detector installation programme within existing budgets.

3. Proposal

- 3.1 The specification for the recent Gas contract included a Schedule of Rate (SoR) for the installation of CO detectors. The CO detector that has been recommended by our current contractor, Swale Heating, is a battery operated detector that can be installed for a cost of £35.00 per unit. These units have a 10 year warranty and a 10 year battery life.
- 3.2 To install a CO detector in all applicable council owned housing, approximately 5,000 properties, as per the current schedule of rate referred to in section 3.1 of this report it would cost in the region of £175,000.
- 3.3 Subject to Member approval, Swale Heating have confirmed they could commence installation week commencing 02 October 2019 which would be carried out during the annual gas servicing visit. Once installed they would be checked annually and recorded on the Landlord's Gas Safety Record (LGSR) which would form part of the existing arrangement with Swale Heating with no additional cost.
- 3.4 If the installation programme started on 02 October 2019, 500 properties could be completed during the 2019/2020 Gas Servicing programme at a cost of £17,500. The remaining 4,500 properties would be completed during 2020/2021 at a cost of £157,500
- 3.5 As the installation of the detectors will be linked to, and completed at the same time as the annual gas service, tenants will be informed of the detector installation in writing which will also confirm their appointment. The letter will contain helpful advice on why CO detectors are installed, how they are maintained and what residents should do if the detector is activated. This will be followed up by advice given by the engineer to tenant whilst on-site fitting the device.

4. Budget

- 4.1 As referred to in Section 3 of this report, following the retendering of the Gas Contract a more competitive cost is being achieved on installations.
- 4.2 Against an estimate of £3,500 per property for a gas boiler installation, an average outturn of £2,500 is being achieved. Should this trend continue throughout the remainder of the financial year a potential underspend of £165,000 could be realised.
- 4.3 The reduction in spend on boiler installations, together with the efficiency savings referred to in Section 2 of this report are likely to return an annual saving in the region of £226,000 against original budget.

- 4.4 Therefore, should the proposal as outlined in Section 3 of this report be approved the cost for installing CO detectors could be met from the existing HRA Capital Heating Installation budget estimated underspends for years 2019/20 and 2020/2021.

5. BACKGROUND PAPERS

- 5.1 None.

Anyone wishing to inspect background papers should, in the first place, be directed to Committee & Electoral Services who will make the necessary arrangements.

IMPLICATIONS

APPENDIX 1

Legal	Gravesham Borough Council (GBC) has a duty of care to its tenants to ensure that their health and safety is not put at risk and whilst there are no legal obligations on the Council as a landlord to install CO detectors, it is considered to be best practice.
Finance and Value for Money	Budgets for all proposed works can be met from within the existing HRA accounts due to savings achieved through proactive reprofiling of work programmes and the reprocurement of gas installation and servicing contract.
Risk Assessment	The installation of CO detectors significantly reduces the risk to tenants by detecting and alerting the tenant to the presence of carbon monoxide gas within a property in order to prevent carbon monoxide poisoning.
Equality Impact Assessment	Screening for Equality Impacts
	Question
	a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer. No
	b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer. No
	<i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i>
Corporate Plan	02 Stronger Gravesham Improve the standard and efficiency of our housing stock. 04 - Sound & self-sufficient council - Continuously review and adapt how we deliver our services to achieve financial efficiencies and improved performance.
Crime and Disorder	N/A
Digital and website implications	N/A
Safeguarding children and	N/A

vulnerable adults	
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