
Proposed Social Housing (Automatic Fire Suppression Systems) (Scotland) Bill

Shelter Scotland
consultation
response

April 2018

SUMMARY

Shelter Scotland welcome the opportunity to respond to the consultation on the proposal for a Bill to require Scottish Social Housing to be fitted with Fire Suppression Systems.

Shelter Scotland helps over half a million people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no one will have to turn to us for help.

We're here so no one has to fight bad housing or homelessness on their own.

At Shelter Scotland, we believe everyone is entitled to a safe, secure and affordable home, and safety from fires is a crucial part of that. Recent tragic events at Grenfell Tower in London show the devastating consequences that fire can have on lives, families and whole communities. It is paramount that we learn from this, and that all reasonable measures are taken to ensure people are safe in their homes.

We welcome the proposed Bill which gives an opportunity to discuss further safety measures, specifically in the form of sprinklers in social housing. We support efforts to increase tenant safety, whilst questioning the introduction of a new standard specifically for social housing and not other tenures. We believe it is of paramount importance that any decision to require fire suppression systems in new-build social housing should be based on evidence that this is the most effective support and protection for tenants in relation to alternative measures and look forward to the conclusion of the Scottish Government's Building Standards (Fire Safety) Review Panel and the further evidence this will bring to the debate.

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QUESTIONNAIRE RESPONSES

Aims and approach

Question 1: Which of the following best expresses your view of requiring fire suppression systems (i.e. fire sprinklers) to be fitted in new-build social housing?

- Fully supportive
- Partially supportive
- Neutral (neither support nor oppose)
- Partially opposed
- Fully opposed
- Unsure

Please explain the reasons for your response, including what you see as the advantages or disadvantages.

At Shelter Scotland, we believe everyone is entitled to a safe, secure and affordable home, and safety from fires is a crucial part of that. This right should not be dependent on the tenure someone lives in, but should be an achievable standard wherever they live, and our recent response to the consultation on fire and smoke alarms in Scottish housing recommended cross-tenure standards which have now been approved. However we recognise the practical factors in pushing for improved standards in social housing, and particularly new build, where there is a greater element of control and that these can help lay the path for future reforms in other tenures.

Efforts to improve the safety of individuals from fire within their own home are welcome, but there is an opportunity cost where improvements made in one area may result in less resource for other works. As such we believe it is of paramount importance that any decision to require fire suppression systems in new-build social housing should be based on evidence that this is the most effective support and protection for tenants. Further information from the Scottish Government's Building Standards (Fire Safety) Review Panel¹ who are currently reviewing standards including the provision of sprinklers should provide more evidence to help determine the best way forward for tenant safety including looking at the provision of fire suppression systems in comparison with other measures.

Question 2: Which of the following best expresses your view of requiring fire sprinklers to be retrofitted into housing owned by social landlords which is located in high-rise buildings built prior to 2005?

- Fully supportive
- Partially supportive
- Neutral (neither support nor oppose)

¹ Building Standards (Fire Safety) Review Panel, Minutes January 2018, <https://beta.gov.scot/publications/building-standards-fire-safety-review-panel-minutes-january-2018/>

- Partially opposed
- Fully opposed
- Unsure

Please explain the reasons for your response, including what you see as the advantages or disadvantages.

Currently, people living in high rise buildings built before 2005 are not entitled to the same protections from sprinkler systems as those living in high rise buildings built since 2005.

As stated above, Shelter Scotland believe that everyone, no matter their tenure or age of their property should be entitled to the same level of safety from fire in their home however we recognise the practical factors in pushing for higher standards in social housing. We do feel that if the level of risk is considered sufficient enough to enforce this new standard for new social housing then this should also be considered for social housing located in high-rise buildings built prior to 2005.

In addition, we believe any new standard should be considered for housing which is privately owned and rented of the same age. This is particularly important given the relative rise in the private rented sector which has tripled since 1999, with social housing no longer an option for many people. We believe private renters and occupants in owner occupied housing should be entitled to the same level of protection as their social renter counterparts, and a cross-tenure standard would provide this as well as safeguarding neighbours who currently lack control over their own safety if another occupant in the building does not have such protection. Sufficient support would have to be provided to assist compliance in owner occupied and privately rented homes.

Question 3: Do you think that there are other steps which could be taken (either instead of, or in addition to legislation) to achieve the aims of the proposal?

- Yes
- No
- Unsure

Please explain the reasons for your response.

The aim of the Scottish Ministerial Working Group is to oversee a review of building and fire safety regulatory frameworks, and includes a specially formed Building Standards (Fire Safety) Review Team looking at fire safety regime which is due to report back to the group in summer 2018. This review, and other information from this Scottish Ministerial Working Group, will provide up to date information and recommendations which can be used to answer the question above.

In addition, the consultation on fire and smoke alarms has now completed. Shelter Scotland agreed with the proposal for a common new minimum standard for fire and smoke detectors to be implemented in all housing, regardless of

tenure, which has now been approved.^{2 3} This higher standard of alarm for social housing, once rolled out, may impact on some of the modelling evidence used on risk levels in social housing.

Please note: No answers were provided in the consultation response for the sections on financial implications, equalities and sustainability.

Contact:

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² Shelter Scotland, 2018, Consultation on fire and smoke alarms in Scottish homes, https://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/consultation_on_fire_and_smoke_alarms_in_scottish_homes

³ Minister for Local Government and Housing, 4th April 2018, Blog: Fire and smoke alarm regulations, <http://www.scottishhousingnews.com/20704/blog-fire-smoke-alarm-regulations/>

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