

**PARLIAMENTARY STATEMENT - FIRE ALARMS STANDARDS
CABINET SECRETARY FOR SOCIAL JUSTICE HOUSING AND LOCAL GOVERNMENT**

	<p>Commencement of Strengthened Fire Alarms Standard to Protect Life</p> <p>Wednesday 19 January, in person</p>
<p>ATTENDEES</p>	<p>Statement to Parliament, in person</p> <p><u>Official Support (virtual)</u></p> <p>Simon Roberts, Housing Quality & Standards team Catriona MacKean, Deputy Director - Better Homes</p>
<p>AGENDA</p>	<p>You are making a statement on the new Fire Alarms Standard</p>
<p>YOUR MAIN OBJECTIVE</p>	<p>Confirm the new regulations will come into force from 1 February, following a 1 year delay due to Covid-19, as an essential change required to improve fire safety and protect life</p> <p>Explain decision making behind the change to these regulations to apply to all tenures and why these changes are necessary</p>
<p>PRACTICAL ARRANGEMENTS</p>	<p>You will provide a 10-12 minute statement. This will be followed by approx. 15-20 minutes of questions from the Chamber.</p>

CONTENTS

SECTION	TOPIC	PAGE NUMBER
ITEM 1	Top Lines	3
ITEM 2	Approach to enforcement	4
ITEM 3	Supply of alarms	5
ITEM 4	Awareness Raising	6
ITEM 5	Support available	7
ITEM 6	Insurance	8
ITEM 7	Information for home owners	9
ANNEX A	Q&A for likely questions	10

ITEM 1	Top Lines
ISSUE/ BACKGROUND	<p data-bbox="488 259 1390 367"><u>Fire safety remains a key priority for Scottish Government. These regulations were introduced to protect lives and property following the tragic Grenfell Tower fire.</u></p> <ul data-bbox="488 412 1390 1738" style="list-style-type: none"> <li data-bbox="488 412 1390 479">• We are committed to achieving improved fire safety and one death from fire in Scotland’s homes is one too many. <li data-bbox="488 524 1390 631">• The presence of working fire alarms is proven to save lives and is one of the most important investments you can make to protect life and property. <li data-bbox="488 676 1390 815">• We estimate that the average cost of an alarm that would meet the new standard will be in the region of £220 based on the type of alarms (tamper proof long-life lithium battery alarms) a householder can install themselves. <li data-bbox="488 860 1390 967">• New builds and properties in the Private Rented Sector must already meet this standard, in place for them since 2013. <li data-bbox="488 1012 1390 1191">• Landlords have made good progress in the Social Rented Sector through the support of £15m loan funding from the Scottish Government and had well developed plans for installing to the new standard by February 2021 which are now even further on. <li data-bbox="488 1236 1390 1442">• In light of the challenges posed by the coronavirus (COVID-19) pandemic, we recognised that some homeowners will have faced additional difficulty this year in making the required changes; that is why we already delayed implementation by an additional year allowing people more time <li data-bbox="488 1487 1390 1738">• This delay has also allowed us to undertake further significant awareness raising activity and to provide funding to Care and Repair to support older and disabled home owners alongside the £1m funding already provided to the Scottish Fire and Rescue Service to install alarms during their Home Fire Safety Visits to owner occupied properties assessed to be at high risk from fire <p data-bbox="488 1783 1390 1850"><u>Scottish Legislation is ahead of the provisions in England and Wales.</u></p> <ul data-bbox="488 1872 1390 2002" style="list-style-type: none"> <li data-bbox="488 1872 1390 2002">• England and Wales have similar standards for new build housing, but not for rented or owner occupied housing. The UK Government is also considering new minimum standards for rented housing.

ITEM 2	Approach to enforcement
ISSUE/ BACKGROUND	<p>The legislation provides flexibility for people to fit the necessary alarms in due course if they are unable to do so by the February 2022 deadline.</p> <ul style="list-style-type: none"> • Local authorities will be taking a proportionate and measured approach to compliance taking individual circumstances into account as well as reflecting the evolving situation with the Covid 19 pandemic. • No one will be criminalised if they need more time and there are no penalties for non-compliance. However, we would encourage everyone to install these alarms, which can help save lives. • The aim of housing standards is to improve houses, not to criminalise home owners. It is right that the new standard for fire alarms should be built into the tolerable standard as improvement to fire safety should be part of the basic requirements on all tenures to improve fire safety. • A statutory minimum standard for fire alarms through the tolerable standard defines what is expected for all homes. <p>The legislation does not put the duty directly on an owner-occupier, so they are not breaking the law if they don't comply.</p> <ul style="list-style-type: none"> • The duty rests with the local authority to ensure that homes in their area are up to standard. • However, owners should ensure their home meets minimum standards. If the owner has difficulty complying, that is a trigger for intervention by the local authority. Often it's also a threshold for help and assistance. • But even with more serious failures of standards, intervention should be proportionate and the legislation allows a reasonable time to bring homes up to standard. • A key aim of our awareness raising campaign has been to encourage people to act and play their part because it will greatly reduce the risk of death from fire in their home. • Whilst the legislation does not create a direct duty on home owners, in practice it will be the responsibility of the homeowner to meet the new standard.

ITEM 3	Supply of alarms
ISSUE/ BACKGROUND	<p>I am aware that due to the global supply shortages of component parts, some manufacturers are having ongoing issues with the supply of fire alarms.</p> <p>As of this morning, my officials have and confirmed that fire alarms are currently available for purchase and delivery where the manufacturer has a UK supply chain.</p> <p>Some manufacturers of fire alarms continue to have supply chain issues with imported components, which limits the availability of their alarms for immediate purchase – but as I have said before, the legislation makes allowance for the reasonable additional time needed in this situation.</p> <ul style="list-style-type: none"> • Some manufacturers of fire alarms are facing global shortages of necessary components – this affects those manufacturers who rely on imported components. • Some manufacturers have stock availability and specialist retailers are also able to meet demand, subject to logistical challenges. • We are in discussions with the Fire Industry Association to establish which manufacturers are affected and what the expected timescales are for availability of stock more generally. • The legislation provides flexibility for work to be completed within a reasonable period, taking into account individual circumstances.

ITEM 4	Awareness raising
ISSUE/ BACKGROUND	<ul style="list-style-type: none"> • Since the legislation was delayed from 2021, the Scottish Government has been keeping parliament updated and made material available so that MSPs can inform their constituents about the important changes to fire alarms from Feb 2022. • I wrote to all MSPs in 2021 with further information and FAQs, and an electronic toolkit of resources has been given to key stakeholders • A dedicated Scottish Government website contains full information and advice regarding the new standard. The Scottish Government also ran a highly successful awareness raising campaign in August and September and made additional funding available to support those older or disabled. <p><u>We know the Scottish Government’s fire alarms awareness raising campaign lead to high levels of awareness of the new standard, and there is significant public interest in complying with the new standard for fire alarms.</u></p> <ul style="list-style-type: none"> • The marketing campaign ran from 19 August to 26 September 2021, across media channels including TV, radio and digital advertising, supported by partnerships to extend the reach of the campaign, reaching nearly 4.4 million people (over 95% of adults). • Supporting print materials, posters and 96,000 information leaflets were distributed to all libraries in Scotland. <p><u>The Scottish Government commissioned independent evaluation of the campaign, which found that it had exceeded its targets for increased awareness, understanding and commitment to take action.</u></p> <ul style="list-style-type: none"> • Independent follow-up analysis in December 2021 showed that 88% of the homeowners surveyed were aware of the new legislation • We are now developing a further awareness raising campaign to remind people about the new standard once it is in place and continue to encourage people to improve their fires safety.

ITEM 5	Support available
ISSUE/ BACKGROUND	<p><u>We know that some homeowners may not be able to meet the cost of fitting the necessary alarms which is why we provided £500,000 through Care and Repair Scotland to help the elderly and disabled.</u></p> <ul style="list-style-type: none"> • This was in addition to the £1m funding provided to SFRS for its Home Fire Safety Visit programme to owner occupied properties assessed to be at high risk from fire. • We also provided £15m loan funding to social landlords to support them to fit compliant alarms for all tenants. • Flexibility is built into the existing legislation through a provision setting out that the work should be done “within such period as is reasonable in all the circumstances”, allowing flexibility for home owners unable to install alarms by 1 February 2022. • People are understandably concerned about having the necessary alarms fitted by the new deadline of 1 February 2022, and we are in contact with manufacturers to discuss these supply issues and when they are likely to be resolved. • No home owner will be criminalised if they need more time, and there are no penalties for non-compliance. <p><u>Care and Repair will make full use of their allocation to provide 2,000 households with free alarms, plus additional households with subsidised alarms which are provided at a discount by the manufacturer.</u></p> <ul style="list-style-type: none"> • Since 28 September, Care and Repair services have dealt with 2,328 enquiries about fire alarms. They have completed installation of free alarms to 328 households with a further 183 households supported with subsidised alarms. Most enquiries have been for advice only. • This support is assisting those who are least able to fit alarms for themselves. • The general principle is that owners are responsible for the cost of looking after private property. • Our targeted funding is reaching those most at risk and least able to do the work themselves.

ITEM 6	Insurance
ISSUE/ BACKGROUND	<p><u>It will be for individual insurance providers to decide whether they include the new requirements in their policies. Anyone who is unclear about the terms and conditions of their specific policy in relation to the fire and smoke alarm requirements should get in touch with their home insurer in the first instance.</u></p> <ul style="list-style-type: none"> • Officials have engaged throughout the legislative process with the ABI, who have advised that ABI member firms are aware of the upcoming changes to fire alarms legislation from 2022. • ABI has indicated, and has set out on its website, that insurers may ask a customer questions about whether the property is fitted with working fire alarms, but are not likely to ask questions about specific standards. They advise policyholders to contact their insurance providers directly if they are uncertain about the term and conditions of their policy.

ITEM 7	Information for Home Owners
ISSUE/ BACKGROUND	<p>Preventing scams</p> <p>We have made sure that people can get advice on the type of alarms that will meet the standard (although not recommendations of specific brands), through detailed information on our website and working with the Scottish Fire and Rescue Service.</p> <p>We would always advise people, for any work on their home, to exercise care to ensure they employ reputable tradespeople.</p> <p>I would want to be clear that should we find out that firms are not adhering to consumer protection laws we will work with local authority consumer protection and trading standard teams to ensure appropriate action is taken.</p> <p>Clear information</p> <p>I recognise there are a number of different products, so good information on which ones meet the standard is key.</p> <p>The standard for alarms is clear – one alarm in the principal living room, one in each circulation space and a heat alarm in the kitchen. They must be interlinked, and can either be all mains-powered or sealed life-long battery operated. In addition, where there is a carbon-fuelled appliance (such as boilers, fires (including open fires) and heaters) or a flue, a carbon monoxide detector is also required which does not need to be linked to the fire alarms.</p> <p>Benefits of interlinked alarms</p> <p>Interlinking is crucial to the effectiveness of the system. Alarms are designed to rouse someone who is asleep in their bedroom if placed in a landing or hallway. Having an interlinked system means you will be alerted immediately, regardless of the room in which the alarm is triggered, increasing the chance to escape.</p> <p>In the 4 years from 2014-2018, where fatalities were recorded, on average 30% of fires started in the living room, and 15% in the kitchen. This means that a significant number of fire related deaths occurred from fires starting in these rooms. It is therefore important that the outbreak of fire in living rooms and kitchens is detected quickly and the alarm raised as early as possible during the early stages of fire growth.</p>

Annex A: Q&A likely questions

Constituents who have heard media reports that their home insurance will become invalid if interlinked smoke detectors aren't installed by 1st February 2022 are worried; can the Minister advise on this concerning matter and provide reassurance to citizens who are anxious as they have not as yet been able to have interlinked smoke detectors installed – based on cost, supply issues or lack of awareness of the requirements.

An insurance policy is a contract between a home owner and an insurer, and the rights and responsibilities of each depend on the specific terms of the contract.

We have spoken to the Association of British Insurers about this, and they are quite clear that insurers may ask customers questions about whether the property is fitted with working fire alarms, but are not likely to ask questions about specific standards.

Fire alarms give warning in the event of a fire, so that they can escape, but alarms do not stop fires starting or prevent the damage that a fire will cause to property.

I appreciate that people are anxious about this and I am concerned that some of the reports, such as claims that insurance policies will be “worthless”, is causing unnecessary anxiety.

Anyone who is unclear on their policy terms and conditions in relation to the new law in Scotland should speak to their insurer.

Many local authorities including West Lothian Council have removed Care and Repair bodies. Installers are scarce and the cost of living, including energy cost pressures, are causing practical and financial challenges. Are there any other pro-active actions which can help resolve the real challenges facing some, but by no means all, to get private sector dwellings up to the same and important safety standards

All local authorities have broad discretionary powers to provide assistance to home owners where work is needed to look after homes or to meet statutory standards. The local authority is best placed to decide what assistance is provided to meet local priorities using local resources.

The additional support we have provided to Care and Repair services is targeted to assist owners who are least able to fit alarms themselves, it is not intended to be a substitute for local initiatives.

What evidence is there that such protections will protect lives

Alarms are designed to produce a sound output sufficient to rouse someone sleeping in a bedroom if placed in a landing or hallway. Having an interlinked system means you will be alerted immediately, regardless of the room in which the alarm is triggered, increasing the chance to escape. This is particularly important to ensure that you would be woken quickly in the event of a fire during the night.

In 2018/19, there were 44 fire fatalities in Scotland, 19 of these fires started in a living room, and another 4 in a kitchen. From 2014-2015 to 2017-2018 where fatalities were recorded, on average 30% of fires started in the living room, and 15% in the kitchen. This means that a significant number of fire related deaths occurred from fires starting in these rooms. It is therefore important that the outbreak of fire in living rooms and kitchens is detected quickly and the alarm raised as early as possible during the early stages of fire growth.

The standards for these interlinked alarms was set nearly 15 years ago for new build and nearly a decade ago for the private sector, and I agree all houses should have same standards, why did this take longer to introduce?

In 2013, the Scottish Government published a Sustainable Housing Strategy with a commitment to develop a new cross tenure standard for housing. We have engaged with stakeholders since then to develop our proposal for a new Housing Standard for Scotland, based on housing as a human right, and we will be seeking views on that in a public consultation later this year. Following the tragic fire at Grenfell tower in 2016, we made a commitment to accelerate the fire alarm elements of a new standard, and these regulations which were introduced to this Parliament in 2018 will achieve that aim.

What impact does Cab Sec expect these changes to have on fire safety for households?

Interlinked alarms will save lives. Alasdair Perry, Head of Prevention and Protection at the Scottish Fire and Rescue Service, has said, "Having the earliest possible warning of a fire in the home can and has saved lives and property. Having interlinked alarms installed will allow everyone, anywhere in the house to take action as quickly as possible."

How will SG track progress on meeting this standard after it has been implemented?

The Scottish House Condition Survey collects information on homes and minimum standards for housing. This legislation will add adequate provision of fire alarms to that minimum standard. Future iterations of the Survey will collect data on compliance with this element of housing standards.

Care and Repair: Funding Allocation

The Scottish Government has provided a grant of £500,000 to Care and Repair Scotland to support assistance for home owners with the installation of fire alarms and carbon monoxide detectors to meet new Scottish minimum standard.

Care and Repair Scotland advise that the allocation was made as follows -

Office	Payment	Date
Aberdeen City	£25,000	28/09/21
Aberdeenshire	£15,000	07/10/21
Alness (Highlands)	£35,000	11/10/21
Argyll and Bute	£12,000	05/10/21
Ayrshire	£30,000	07/10/21
Dumfries and Galloway	£20,000	06/10/21
Dundee	£30,000	12/10/21
East Lothian	£14,000	06/10/21
Edinburgh	£50,000	30/09/21
Fife	£16,000	08-11/10/21
Glasgow	£50,000	01/10/21
Lochaber (Highlands)	£6,000	28/09/21
Lomond and Clyde (West Dunbartonshire)	£10,000	08/10/21
Moray	£10,000	08/10/21
Orkney	£11,000	29/09/21
Perth and Angus	£15,000	06/10/21
Renfrewshire	£50,000	04/10/21
Scottish Borders	£5,000	28/09/21
Shetland	£5,000	28/09/21
Skye	£5,000	28/09/21
South Lanarkshire	£51,000	29/09/21-5/10/21
South Lanarkshire	£15,000	05/10/21
Stirling	£10,000	12/10/21
Western Isles	£25,000	08/10/21
TOTAL	£500,000	

Care and Repair advise that under their bank's rules for commercial accounts it was not possible to allocate all the funds on the same day (£50k limit on transactions without additional costs). Funds were allocated on the basis of bids from local offices, based on the anticipated demand from their clients, prioritisation of need, and their capacity to provide assistance.

From: [Redacted]

Sent: 21 January 2019 12:03

To: [Redacted]

Subject: Fire and Smoke Alarms in Scottish Homes - Standards

Good morning [Redacted] and [Redacted] - I hope you are well. (apologies, I don't have a contact email for [Redacted])

Please find attached Q and A which we will publish alongside a Blog from the Minister on 1 February 2019.

As you can see, we have made no mention of the actions which may be taken by insurance companies if home owners do not comply with the new standards however, if pressed, we propose the following:

Isn't there a risk of people being refused insurance if their house does not meet the requirements in the guidance?

Scottish Government has engaged with the Association of British Insurers (ABI) In general it will be for individual insurers to decide how they respond to the new standard. Insurers tend to ask whether the property is fitted with working smoke alarms, rather than questions about specific standards.

It's also unlikely there would be significant premium discounts for having different type of smoke alarms. Fire is not a major proportion of premiums compared to other perils and so any reduction would have a limited effect on the overall premium price. However, false information may invalidate cover in the event of a claim, but again that's a decision for individual firms and depends on the circumstances.

I'd be grateful for your thoughts/comments by **midday on Wednesday 23 January**.

Thanks in advance

[Redacted]

From: [Redacted]

Sent: 23 January 2019 11:43

To: [Redacted]

Subject: Fire and Smoke Alarms in Scottish Homes - Standards

[Redacted]

Many thanks for sharing the suggested text related to insurer's approach to changes in fire alarm. I think this is generally on track - i've made some minor suggested ammends below - any questions please let me know.

i've deleted the part about premium reductions as i can imagine it would cause further questions. hope thats ok.

Isn't there a risk of people being refused insurance if their house does not meet the requirements in the guidance?

Scottish Government has engaged with the Association of British Insurers (ABI) In general it will be for individual insurers to decide how they respond to the new standard. Insurers tend to ask whether the property is fitted with working fire alarms, rather than questions about specific standards. However, insurers also expect for homeowners to ensure that their property is in line with the law.

if homeowners are unsure of their insurer's approach we would advise speaking directly to your insurer.

Hope that's ok - come back to me if you have any further questions.

[Redacted]

From: [Redacted]

Sent: 19 October 2020 17:17

To: [Redacted]

Subject: Media inquiries on new fire and smoke alarm standards

Hello both – I just wanted to let you know that we're fielding a few inquiries on the above (as you may be too).

Following on from the story in yesterday's Mail on Sunday on charges for the installation of fire and smoke alarms, we've had a similar inquiry from The Herald which seems to be pushing a line that Scottish Government changes to fire alarms would make thousands of people's home insurance policies invalid and they will struggle to get home insurance if they don't comply.

As we've previously discussed, that's unlikely to be the case but it'd be helpful to compare our respective media statements and how we're handling such inquiries.

I've also had an email from a Highlands and Islands Councillor who has cc'd the Cabinet Secretary for Finance – happy to share details of that too if helpful.

Regards,

[Redacted]

From: [Redacted]

Sent: Tuesday, October 20, 2020 7:28:53 PM

To: [Redacted]

Cc: [Redacted]

Subject: RE: Media inquiries on new fire and smoke alarm standards

Hi **[Redacted]**,

Please accept my apologies for not being able to get back to you today – things have been very fast paced and trying to manage many competing demands. I will give you a call tomorrow.

Thanks

[Redacted]

From: [Redacted]

Sent: 20 October 2020 19:46

To: [Redacted]

Cc: [Redacted]

Subject: Re: Media inquiries on new fire and smoke alarm standards

Not a problem **[Redacted]** - I can imagine it's been a busy day.

For information, here's the ABI statement we gave to The Herald on Monday on the insurance position which we'd previously discussed with **[Redacted]** and **[Redacted]**:

The new regulations and impact will be dependent on the person's policy with their insurer. Insurers underwriting process and policy terms are individual to them. For example, one insurer may set out that the property needs to meet fire safety regulations as a condition to a claim, whereas another may not specifically state this in the policy. An individual's claims will be dependent on if they meet the terms set out in their policy with their insurer. Anyone who is unclear on their policy terms and conditions in relation to the change by the Scottish Government should speak to their insurer.

Happy to speak tomorrow if helpful, although the insurance issue here is not a material one. I'm free from 11.00am until 1.30pm.

Regards,

[Redacted]

From: [Redacted]

Sent: 23 October 2020 17:46

To: [Redacted]

Cc: [Redacted]

Subject: RE: Media inquiries on new fire and smoke alarm standards

[Redacted],

Thank again for your time on Wednesday. It was good to speak with you. As promised here is the Q&A on the insurance point that we discussed which is on our website's Q&A - <https://www.gov.scot/publications/fire-and-smoke-alarms-in-scottish-homes/>

Q: How will the new regulations impact my household insurance policy?

A: Different home insurance policies provided by different insurers will have varying terms and conditions which a homeowner must comply with in order for their home insurance to be valid. Anyone who is unclear about the terms and conditions of their specific policy in relation to the fire and smoke alarm requirements should get in touch with their home insurer in the first instance, to check whether the new requirements will be specifically included in their policy or not.

Thanks

[Redacted]

From: [Redacted]

Sent: 14 December 2020 10:30

To: [Redacted]

Cc: [Redacted]

Subject: RE: Media inquiries on new fire and smoke alarm standards

Hi [Redacted],

As discussed I'd suggest the following points for the Minister's briefing in case any insurance issues are raised during the debate:

- The Association of British Insurers supports measures to reduce the risk of fire to people's safety and their homes. It's important for all Scottish households to make sure they are conforming to the new Scottish Government regulations on fire and smoke detectors ahead of the new deadline, as these alarms could be the difference between getting out of the home safely and a far more serious outcome.
- The questions that insurers may ask to assess fire risk are commercial decisions for individual insurers to take. Any changes to policy wording in response to these new regulations would be a matter for individual insurers. Insurers tend to ask whether the property is fitted with working fire alarms, rather than questions about specific standards.
- However, insurers also expect homeowners to ensure that their properties are maintained in line with the law. If homeowners are unsure of their insurer's approach or whether they are covered then they should speak directly with their insurers.

For your own background, and as discussed with [Redacted] previously, because property insurance (home/contents and buildings cover) relates to property as opposed to people then there is unlikely to be much impact on property insurance premiums when interlinked fire and smoke alarms are installed. The alarms provide a warning but are dependent on people responding to them, and the priority is preserving life i.e. getting everyone out of a building to safety. Alarms themselves will not significantly improve the protection or preservation of the property and contents.

I hope this is helpful and if you need anything else then do let me know.

All the best,
[Redacted]

From: [Redacted]

Sent: 20 December 2021 10:05

To: [Redacted]

Cc: [Redacted]

Subject: RE: Media inquiries on new fire and smoke alarm standards

Hello again [Redacted],

I understand that Mark Griffin MSP has lodged a topical PQ this week on the new fire and smoke alarm standards follow the media coverage in the Sunday Post

yesterday. If you or colleagues are preparing a Ministerial response for that then I thought you'd appreciate sight of what the ABI has been saying to media and various MSPs who have asked about this in recent weeks.

Our media line is:

“Insurers will expect that households and businesses are compliant with any legislation on requirements for the property, such as a requirement to have fire alarms. They may ask customers questions about whether the property is fitted with working fire alarms, but are not likely to ask questions about specific standards. It will be for individual insurers to decide how they respond to the new standard – anyone who is unclear on their policy terms and conditions in relation to the new law in Scotland should speak to their insurer.”

In MSP correspondence we have said:

The ABI supports measures to reduce the risk of fire to people's safety and their homes and so it is important for all Scottish households to make sure they are conforming to the new Scottish Government regulations on fire and smoke detectors ahead of February's deadline. The ABI worked with the Scottish Government officials who drafted these regulations in 2018 and advised them on the insurance perspective on the new fire and smoke alarm requirements. We have briefed our member companies throughout this process so that they are aware of the new regulations coming into force in Scotland from next year.

Insurers will expect that households and businesses are compliant with any legislation on requirements for the property, such as a requirement to have a fire and smoke alarm. However, insurers are not likely to ask questions about specific standards. The questions that insurers may ask to assess fire risk are commercial decisions for individual insurers to take, and many insurers will already ask questions regarding fire and smoke detectors.

While any changes to policy wording in response to these new regulations would be a matter for individual insurers, many policies may be offered on a UK-wide basis, and therefore may not account directly for these new regulations in their policies, or in questions they choose to ask to help them to assess risk. However, I would stress that these commercial decisions have no impact on the status of these regulations in law, and the requirement for households to follow them. Anyone who is unclear on their policy terms and conditions in relation to the change by the Scottish Government should speak to their insurer.

We are also adding the text below to the ABI's home insurance webpage:

In Scotland the law on fire alarms is changing from February 2022 which means all Scottish homes will need to have interlinked alarms – you can read more about this change [here](#). Insurers support measures to improve fire safety, and we support the use of high integrity alarms as per the Fire Protection Association [guidance](#). ABI member firms are aware of these new regulations coming into force. Insurers will expect that households and businesses are compliant with any legislation on requirements for the property, such as a requirement to have fire alarms. They may ask customers questions about whether the property is fitted with working fire alarms, but are not likely to ask questions about specific standards. It will be for individual insurers to decide how they respond to the new standard – anyone who is unclear on their policy terms and conditions in relation to the new law in Scotland should speak to their insurer.

I'm on leave this week but will keep an eye on emails so if you need anything else, or I should be speaking to someone else on this, then please let me know.

Regards,
[Redacted]

From: [Redacted]
Sent: Monday, December 20, 2021 10:54:14 AM
To: [Redacted]
Cc: [Redacted]
Subject: RE: Media inquiries on new fire and smoke alarm standards

Hello [Redacted],

Many thanks for this. You must have been reading my mind as I was going to get in touch with you. Just to note [Redacted] has left my unit and [Redacted] is the new Team Leader so do please update your contact list.

My colleagues have flagged the below article from yesterday's media article: The Sunday Post (English) 4 **Sound the alarm: Insurance firms warn Scots may not be covered if homes don't meet new laws (that no one knows about)** Insurers have warned homes may not be covered if Scots do not fit fire alarms under looming new laws. Ministers have been accused of burying their heads in the sand as critics describe the introduction of the legislation demanding interlinked fire alarms in February as shambolic. Yesterday, charities echoed concern over the legal changes which take effect in less than seven weeks

Is the section in yellow a change in position or are you able to shed any light into that. We have used the lines as agreed with you previously that:

Different home insurance policies provided by different insurers will have varying terms and conditions which a homeowner must comply with in order for their home insurance to be valid. Anyone who is unclear about the terms and conditions of their specific policy in relation to the fire and smoke alarm requirements should get in touch with their home insurer in the first instance, to check whether the new requirements will be specifically included in their policy or not.

We will need to respond to this so I am wondering if we can say something along the lines of:

'Officials have engaged further with the Association of British Insurers (ABI), who have advised that ABI member firms aware of the upcoming changes to fire alarms legislation from 2022. Insurers may ask a customer questions about whether the property is fitted with working fire alarms, but are not likely to ask questions about specific standards. It will be for individual insurers to decide how they respond to the new standard – anyone who is unclear on their policy terms and conditions in relation to the new law in Scotland should speak to their insurer.'

Just another question: how many insurers in Scotland are members of ABI so that I can give overall context.

Appreciate you are on leave and thank you for keeping an eye on your emails. Give me a call if easier to speak.

Thanks
[Redacted]

From: [Redacted]
Sent: 20 December 2021 11:13
To: [Redacted]
Cc: [Redacted]
Subject: Re: Media inquiries on new fire and smoke alarm standards

You're welcome [Redacted]

The Sunday Post report is misleading. As far as I can see they did not speak to any insurers - the suggestion claims may not be paid came from an insurance broker speculating without having checked with any insurers which is neither helpful or particularly responsible.

Insurers' position is as set out in my last email - I'm not aware of any insurers warning homes may not be covered and we did not say that to the Sunday Post. Different insurers will offer different policy terms so we're not able to say definitively on behalf of the entire industry (including insurers that are not ABI members) but your lines look fine to me.

There are no Scotland—specific insurers but the ABI's members account for more than 90% of the U.K. insurance market.

I've cc'd my colleagues [Redacted] and [Redacted] who are working this week and can help if you need anything else.

Regards,
[Redacted]

From: [Redacted]
Sent: 20 December 2021 11:26
To: [Redacted]
Cc: [Redacted]
Subject: RE: Media inquiries on new fire and smoke alarm standards

Thank you [Redacted] and an e-hello to [Redacted] and [Redacted] too,

This is really helpful – thank you. I am being asked about this story in particular by the First Minister's team too and I am expecting Ms Robison's office to get in touch about it. I won't go into the details of the Sunday Post but I might just tweak the line below. Grateful if [Redacted] or [Redacted] can advise if this is acceptable and if

the lines below at end of **[Redacted]**'s email have been added to the ABI website so that I can ask Ministers to refer to that in any answer.

'Officials have engaged further with the Association of British Insurers (ABI), who have advised that ABI member firms **are** aware of the upcoming changes to fire alarms legislation from 2022. **ABI have indicated, and as set out on its website, that** insurers may ask a customer questions about whether the property is fitted with working fire alarms, but are not likely to ask questions about specific standards. It will be for individual insurers to decide how they respond to the new standard – anyone who is unclear on their policy terms and conditions in relation to the new law in Scotland should speak to their insurer.'

[Redacted]: Hope you have a good break over the festive period and best wishes for Christmas and New Year when you get there.

Thanks
[Redacted]

From: **[Redacted]**
Sent: 20 December 2021 11:46
To: **[Redacted]**
Cc: **[Redacted]**
Subject: RE: Media inquiries on new fire and smoke alarm standards

Hi **[Redacted]**,

[Redacted] and I have read your proposed lines below, and we agree it looks good and is acceptable.

Regarding the ABI website, it is in the process of being updated and we will share this with you when it is complete.

Kind regards,
[Redacted]

From: **[Redacted]**
Sent: 20 December 2021 12:05
To: **[Redacted]**
Cc: **[Redacted]**
Subject: RE: Media inquiries on new fire and smoke alarm standards

Hi **[Redacted]**,

I can confirm the ABI webpage has now been updated, and our guidance regarding this matter can be found under the "How do prevent it?" subheading:
<https://www.abi.org.uk/products-and-issues/choosing-the-right-insurance/home-insurance/fire/>

If we can help in any other way, please let us know.

Kind regards,
[Redacted]

From: [Redacted]
Sent: 14 January 2022 11:42
To: [Redacted]
Cc: [Redacted]
Subject: RE: Media inquiries on new fire and smoke alarm standards

Hi [Redacted] – I see Oliver Mundell MSP has lodged a written PQ on interlinked alarms and home insurance (below). Do you or colleagues need any input from the ABI for a response? If so, please let us know.

Question S6W-05665: Oliver Mundell, Dumfriesshire, Scottish Conservative and Unionist Party, Date Lodged: 13/01/2022

To ask the Scottish Government what it anticipates the impact may be on the home insurance policies of households that are unable to install interlinked fire alarms before the February deadline.

Regards,
[Redacted]

From: [Redacted]
Sent: 14 January 2022 13:49
To: [Redacted]
Cc: [Redacted]
Subject: RE: Media inquiries on new fire and smoke alarm standards

Hi [Redacted],

Yes please – if you can add anything further to the lines you have already provided, that would be very helpful as this has become a big topic of discussion following the media pieces recently. I suspect, however, that because you can't speak definitively for all your members due to their different T&Cs, no cast-iron guarantee that insurance won't be affected can be offered, which is what people will be looking for!

Kind regards,

[Redacted]

From: [Redacted]
Sent: 17 January 2022 11:25
To: [Redacted]
Cc: [Redacted]
Subject: RE: Media inquiries on new fire and smoke alarm standards

You're welcome [Redacted],

The main message for householders is that if you are concerned then speak to your insurer about this. You'll have seen the Sunday Mail coverage yesterday which is frustrating as it didn't use the full quote we gave them below, and misinterprets it for the paper's own purposes.

An ABI spokesperson said: "Insurers will expect that households and businesses are compliant with any legislation on requirements for the property, such as a requirement to have fire alarms. They may ask customers questions about whether the property is fitted with working fire alarms, but are not likely to ask questions about specific standards. It will be for individual insurers to decide how they respond to the new standard – anyone who is unclear on their policy terms and conditions in relation to the new law in Scotland should speak to their insurer."

In terms of the PQ you could point out that Scottish Government (your colleagues [Redacted], [Redacted] and [Redacted]) consulted with the insurance industry on the proposed changes in 2018 including the impact they could have on insurance policies, and that the ABI gave its views on this on behalf of its member companies and also contributed to the FAQs document subsequently produced.

As you say for the reasons below, we cannot offer a definitive yes/no answer which is why the advice is for households to check with their insurers. We have briefed our member companies on this so they are aware of the changes in Scotland and we will send a reminder this month that they come into effect from February 1.

Hope this is helpful,
[Redacted]

From: [Redacted]
Sent: 17 January 2022 12:23
To: [Redacted]
Cc: [Redacted]
Subject: RE: Media inquiries on new fire and smoke alarm standards

Thanks [Redacted].

Is there any merit in expanding on the fact that the new legislation is more about saving lives than property? And therefore would be unlikely to change the outcome for a home insurance claim in the event of a fire – would this have any bearing on how insurers view the legislation?

Kind regards,

[Redacted]

From: [Redacted]
Sent: 17 January 2022 12:44
To: [Redacted]
Cc: [Redacted]
Subject: RE: Media inquiries on new fire and smoke alarm standards

You're welcome [Redacted] – that's the point we discussed with your colleagues back in 2018. I'll forward on the correspondence from then with [Redacted].

Fire and smoke alarms alert householders to a fire but do not do anything to prevent the spread of a fire – that's in contrast to other measures such as sprinkler systems which if triggered can stop the spread or extinguish a fire limiting the damage as well as risk to life.

Fire and smoke alarms are dependent on people responding to them, and when they do it's easier (and more important) to move people out of a property at risk than to move the contents of the property.

However, the likelihood of the new legislation changing the outcome of a subsequent insurance claim is as per our statement that insurers expect households are complaint although they are not likely to ask about specific standards.

Regards,
[Redacted]

From: [Redacted]

Sent: 15 February 2022 09:39

To: [Redacted]

Cc: [Redacted]

Subject: RE: Media inquiries on new fire and smoke alarm standards

Hello again [Redacted],

I just wanted to let you know that we have continued to discuss this issue with ABI member firms and they have agreed to update our position below which now confirms that they will not invalidate a fire damage claim for existing customers purely because they have not yet complied with the new regulations. Hopefully this is helpful for you and colleagues to know.

The ABI media lines now are:

- We support any initiative that can help save lives and would encourage people to install interlinked alarms so that they can evacuate their home safely in the event of a fire.
- Our members are aware of the new regulations coming into force and will not invalidate a home insurance fire claim for existing customers purely because they have not yet complied with the new law in Scotland. Anyone who is unclear on their policy terms and conditions should speak to their insurer.

We're still fielding questions from the media and MSPs about deadlines for compliance and we are pointing out that enforcement lies with Scottish Government rather than insurers, so any guidance you can share on enforcement or deadlines for households to comply would be really helpful.

Regards,
[Redacted]

From: [Redacted]

Sent: 28 September 2021 12:15

To: Cabinet Secretary for Social Justice, Housing & Local Government

Cc: [Redacted]

Subject: RE: Request for Factual Briefing - Fire Alarm Installation Costs and Timescales - by midday

Hi [Redacted]

In response to the Cabinet Secretary's request for briefing, we do not have much additional data on the costs of installation of fire alarms. The estimate for the cost of alarms that you can fit yourself, is based on the mid-range Fire Angel Pro 10, which is still retailing at around £50, which with £20 for a CO detector, gives the estimate of £220 for a standard house. We have noted that the price is currently higher on Amazon, and that online retailers are advising people the current stock of some alarms is low, although supplies will be available later in this calendar year – this appears to affect mostly the cheaper end of the market.

For the cost of installation by electricians, we have only what people have mentioned in correspondence, which is usually in the range £400-£800. Some people have paid more for larger homes or more sophisticated systems, and the cheapest we have heard is £300. We have had some correspondents saying that it is difficult to find an electrician in their area.

I hope that is helpful

[Redacted]

Smoke, heat and CO alarm prices as at: 31/01/2022

Supplier	Cheapest	Mid- Range	Expensive	Carbon Monoxide alarm
Safelincs: Battery alarms	Smoke and heat: £129.59 (3 smoke and 1 heat) Radio-Interlinked Sealed Battery 3 Smoke Alarms and 1 Heat Alarm Kit - Hispec RF Pro Range - £129.59 inc VAT (safelincs.co.uk) Expected dispatch: 14 March 2022	Smoke and heat £143.96 (3 smoke and 1 heat) Hispec pro: Radio-Interlinked Sealed Battery Powered Smoke & Heat Alarms - Hispec RF Pro Range - £35.99 inc VAT (safelincs.co.uk) Expected Dispatch: 28 February 2022	Smoke and heat £332.97 (3 smoke and 1 heat) Aico smoke and heat detectors 10 Year Interlinked Smoke & Heat Alarms - Battery Powered (safelincs.co.uk) Expected Dispatch: 16 February 2022	£21.59: 10 Year Life LED Carbon Monoxide Alarm - FireAngel CO-9X-10 (safelincs.co.uk) Expected Dispatch: Today (one day delivery)
Safelincs: Mains alarms (An electrician will incur additional cost)	Smoke and heat: £52.19 (3 smoke and 1 Heat) Mains Powered 3 Smoke Alarms and 1 Heat Alarm Kit with Alkaline Back-up Batteries - Firehawk - £52.19 inc VAT (safelincs.co.uk) Dispatch: Today (One day delivery)	Smoke and heat: £87.59 (3 smoke and 1 heat) Mains Powered 3 Smoke Alarms and 1 Heat Alarm Kit with Alkaline Back-up Battery - Kidde Firex KF Series (safelincs.co.uk) Expected dispatch: Today (one day delivery)	Smoke and heat: £375.51 (3 smoke and 1 heat) Mains Radio-Interlink Smoke Alarms & Heat Alarms with Self-Charging 10 Year Back-up Battery - Aico Ei3000RF Series - £93.58 inc VAT (safelincs.co.uk) Expected Dispatch: 16 February 2022	N/A
B&Q: Battery alarms	Smoke alarm: £50 (£150 for 3 smoke) FireAngel Pro Connected Battery-powered	N/A	Smoke: £84.99 (£254.97 for 3 smoke) Aico EI650RF	£26 Aico Ei208 Carbon monoxide Alarm with

	<p>Smart smoke alarm DIY at B&Q</p> <p>Heat alarm: £50 FireAngel Pro Connected Battery-powered Heat alarm DIY at B&Q</p> <p>Dispatch, collection only dependent on postcode - but completely out of stock</p>		<p>Battery-powered Smoke alarm DIY at B&Q</p> <p>Heat alarm: £85 Aico Ei603RF Battery-powered Heat alarm DIY at B&Q</p> <p>Dispatch collection only postcode – both in stock in some Edinburgh, Dundee, Glasgow, Inverness stores</p>	<p>10-year sealed battery DIY at B&Q</p> <p>Dispatch available in store and online. 1-3 day delivery.</p>
<p>B&Q: Mains alarms (An electrician will incur additional cost)</p>	<p>Smoke alarm £27 (£81 for 3) Aico Ei146RC Optical Smoke Alarm with Replaceable battery DIY at B&Q</p> <p>Dispatch available in store and online. 1-3 day delivery.</p> <p>Heat alarm: £19 for one FireAngel HW1-R Wired Alarm with Replaceable battery DIY at B&Q</p> <p>RF Base Required as additional cost</p>	<p>*Mid-range smoke alarms not available (assume purchase of £81 for 3 smoke alarms)</p> <p>Heat alarm: £38 Aico Ei144RC Wired Heat Alarm with Replaceable battery DIY at B&Q</p> <p>Dispatch available in store and online. 1-3 day delivery.</p>	<p>Smoke alarm: £80 (£240 for 3 smoke) FireAngel Pro Connected Mains-powered Smart smoke alarm DIY at B&Q</p> <p>Dispatch dependent on postcode – both in stock in some Edinburgh, Glasgow, Elgin stores</p> <p>Heat alarm: £80 FireAngel Pro Connected Mains-powered Heat alarm DIY at B&Q</p> <p>Dispatch available in store and online. 1-3 day delivery.</p>	<p>N/A</p>

<p>Screwfix: Battery alarms</p>	<p>Smoke alarm: £49.99 (£149.97 for 3 smoke) FireAngel Pro Connected FP2620W2-R Battery Interlinked Multi-Sensor Smoke Alarm Smoke Alarms Screwfix.com</p> <p>Heat alarm: £51.99 FireAngel Pro Connected FP1720W2-R Battery Interlinked Thermistek Heat Alarm Heat Alarms Screwfix.com</p> <p>Both are no longer in stock to collect/order online. no alternative is available online or in store</p>	<p>N/A</p>	<p>Smoke alarm:£84.99 (£254.97 for 3 smoke) Aico EI650RF Battery Interlinked RadioLINK+ Smoke Alarm Smoke Alarms Screwfix.com</p> <p>Heat alarm: £84.99 Aico EI603RF Battery Interlinked RadioLINK+ Heat Alarm Heat Alarms Screwfix.com</p> <p>Both are no longer in stock to collect/order online. no alternative is available online or in store</p>	<p>£22.99 FireAngel CO-9D Battery Standalone 7-Year Digital CO Alarm Carbon Monoxide Detectors Screwfix.com</p> <p>no longer in stock to collect/order online.</p> <p>Alternative £49.99 FireAngel Pro Connected FP1820W2-R Battery Interlinked Carbon Monoxide Alarm Carbon Monoxide Detectors Screwfix.com</p> <p>Postcode dependent: Available for same day collection</p>
<p>Screwfix: Mains alarms (An electrician will incur additional cost)</p>	<p>Smoke alarm: £49.99 (£149.97 for 3 smoke) Aico Ei3016 Mains Interlinked Optical Smoke Alarm Smoke Alarms Screwfix.com</p> <p>no longer in stock to collect/order online.</p>	<p>Smoke alarms: £61.99 (£185.97 for 3 smoke) Aico Ei3024 Mains Interlinked Multi-Sensor Fire Alarm Smoke & Heat Detectors Screwfix.com</p> <p>no longer in stock to collect/order online.</p>	<p>Smoke alarm: £79.99 (£239.97 for 3 smoke) FireAngel Pro Connected FP1640W2-R Mains Interlinked Multi-Sensor Smart Smoke Alarm Smoke Alarms Screwfix.com</p> <p>no longer in stock to collect/order online.</p>	<p>N/A</p>

	<p>Heat alarm: £48.99 Aico Ei3014 Mains Interlinked Heat Alarm Heat Alarms Screwfix.com</p> <p>no longer in stock to collect/order online.</p>	<p>Heat alarm: £48.99 Aico Ei3014 Mains Interlinked Heat Alarm Heat Alarms Screwfix.com</p> <p>no longer in stock to collect/order online.</p>	<p>Heat: £79.99 FireAngel Pro Connected FP1740W2-R Mains Interlinked Thermistek Heat Alarm Heat Alarms Screwfix.com</p> <p>Available for next day delivery.</p>	
--	--	--	---	--