

SCOTTISH GAS

WRITTEN SUBMISSION

Summary

Scottish Gas supports the Scottish Government in bringing forward legislation to improve standards in the private rented sector in Scotland through the introduction of its Housing Bill. We entirely support the aim of the Bill “to support improved quality across all rented housing sectors, but with a particular emphasis on the private rented sector.”

In particular we welcome the provision in the Bill to create a new specialist Private Rented Sector tribunal. We believe that this will provide better, quicker and more expert dispute resolution across all housing and landlord/tenant issues. We also welcome the proposed new and enhanced Local Authority powers to intervene to improve standards in the private rented sector. It is the view of Scottish Gas that these provisions, if passed, will make a considerable contribution to improving standards in this sector, and to begin to address the problems which exist within it.

However, as set out below, Scottish Gas also considers that the Scottish Government might have gone further to improve safety and energy efficiency.

Introduction

1. Scottish Gas is one of the leading energy and home service suppliers in the country with over 1.5 million residential customer accounts across Scotland. As part of British Gas our engineers visit 50,000 homes each day across the UK. We supply gas and electricity to more than one million homes in Scotland, and we employ around 900 engineers to carry out service and repair work.
2. In October 2012, Scottish Gas and Shelter Scotland joined forces to help tackle the problem of poor quality private rented homes. As part of a broader partnership with Shelter and as part of British Gas we aim to improve the conditions of one million privately rented homes across the UK over the five years of the partnership. Key themes of this

partnership are to improve the safety and warmth of tenants in the private sector as well as providing help and advice to landlords and tenants

3. We believe the problem of poor standards in the private rented sector is made more acute by the fact that the PRS is an important source of housing for many vulnerable groups and also households with children make up an ever increasing proportion of its residents.
4. We support action to reduce the number of homes which fail to meet the repairing standard as set out in the Housing (Scotland) Act of 2006
5. On safety, carbon monoxide (CO) gas is known as the 'silent killer' because it is invisible and has no smell. CO can be emitted by any faulty appliance which burns a carbon based fuel such as gas, petrol, oil, coal and wood, and as little as 2% in the air can kill within one to three minutes. Children, elderly people, pregnant women and people with respiratory problems are particularly at risk from carbon monoxide poisoning.
6. 69% of all accidental fires in Scottish homes are caused by electrical problems – amounting to 3,400 incidents annually Scottish Gas supports the Electrical Safety Council's call for mandatory 5 yearly checks of electrical installations and appliances; and the introduction of RCD protection in all properties

Improving safety, warmth and well-being

Scottish Gas believes that safety and well-being in the PRS could be improved through simple steps and would recommend:

- Requiring the presence of an audible carbon monoxide alarm mandatory in all private rented properties that have gas appliances.
- Introducing into regulation that a landlords' accreditation scheme should require landlords to not only have an Energy Performance Certificate, a gas safety certificate and electrical safety checks - but that certified copies should be provided to the tenant at the beginning of the tenancy and every 12 months during the life of the tenancy.

- A five yearly electrical safety check which would provide significant additional protection for tenants and is a relatively low-cost way for the Scottish Government and the rented sector in Scotland to demonstrate leadership and best practice.
- Ensuring that Local Authorities have the resources to carry out regular, proactive checking of PRS properties, in accordance with their proposed enhanced powers. Scottish Gas believes this will be particularly important with regards to enforcement under the definition of the repairing standard as introduced by the Housing (Scotland) Act 2006, and the investigation of tenant complaints. It will also be invaluable in ensuring enforcement action can be pursued where necessary.
- Reducing the number of tenants in cold and damp accommodation by promoting measures to increase energy efficiency and reduce fuel poverty such as:
 - encouraging landlords to commission improvements and take advantage of funding that is currently available through the Energy Company Obligation to do so
 - ensuring that greater numbers of landlords adhere to their statutory duty to provide an Energy Performance Certificate to their tenants by requiring that copies are made available to tenants and accrediting bodies responsible for compliance.
- Requiring the inclusion of an obligation for landlords on repairs within the rental contract and the proposed Codes of Practice would be enhanced by adding a Service Level Agreement. This would require a landlord to make provision for repairs within an agreed specified timetable.
- Providing education programmes for tenants and landlords to ensure both understand their rights and responsibilities in this area.
- .Consider the early implementation of Section 55(6) of the Energy Act (2011) which states that “Scottish domestic energy efficiency regulations may come into force no earlier than 1 April 2015.”

- Scottish Gas believes that this would deliver significant and lasting positive impacts for the health, financial and social wellbeing of tenants across Scotland. It will also have a number of secondary effects, including contributing to the aims of the Scottish Government to eradicate fuel poverty by 2016.

Scottish Gas

27 February 2014