



# Gas Servicing and Heating Policy 2024

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## **1. INTRODUCTION**

- 1.1 Granville Community Homes (GCH) is responsible for the maintenance and repairs to its homes, offices and other buildings, many of which will contain gas installations and appliances. The Gas (Installation and Use) (Amendment) Regulations 2018 specifically deal with the installation, maintenance and use of gas appliances, fittings and flues in domestic properties and certain commercial premises. The regulations also place a legal duty on landlords to ensure that gas appliances, fittings and flues provided for tenants' use are safe.
- 1.2 GCH is also responsible for maintaining other types of heating systems to ensure that all appliances, fittings and flues provided for tenants' use are safe. These include gas, ground air source heat pump (ASHP), oil fired, solid fuel, liquid petroleum gas (LPG), biomass, and solar thermal and other types of heating systems.

## **2. SCOPE OF THE POLICY**

- 2.1 GCH must establish a policy which meets the requirements of the Gas Safety (Installation and Use) (Amendment) Regulations 2018. In addition to this, the policy must provide assurance to GCH that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with gas fittings, appliances and flues.
- 2.2 GCH must ensure compliance with gas safety legislation is formally reported at Senior Management Team (SMT) and Board level, including the details of any non-compliance and planned corrective actions.
- 2.3 The policy applies to all companies within GCH and therefore is relevant to all GCH employees, tenants, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 2.4 It should be used by all to ensure they understand the obligations placed upon GCH to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties (owned and managed).

## **3. RESPONSIBILITY**

### **3.1 Key Roles and Responsibilities**

- 3.1.1 In order to ensure that this Gas and Heating Policy, and the supporting procedure are adhered to, GCH will appoint suitably competent personnel to act as the 'Responsible Person' on behalf of the



individual Duty Holder and oversee the implementation and review of these documents.

- 3.1.2 Although the organisation has an appointed Duty Holder, GCH Chief Executive will be ultimately responsible for ensuring compliance with current legislation and to ensure that the organisation fulfils its duties and responsibilities as outlined in this policy document and the supporting procedure.
- 3.1.3 **Appointed Duty Holders** – GCH Directors will fulfil the role of the appointed 'Duty Holders' on behalf of GCH in order to ensure the appropriate management of the risks associated with gas safety. As a result, the Directors will hold responsibility for the implementation of this document, and supporting gas and Heating Procedure, as well as ensuring compliance is achieved and maintained.
- 3.1.4 **Acting Responsible Persons** – GCH Directors shall ensure that there are suitable arrangements in place for the implementation of the Gas and Heating Procedure, as well as overseeing the delivery of the agreed survey inspection programmes and the prioritisation and implementation of any works arising from the surveys.
- 3.1.5 GCH board will have overall governance responsibility for ensuring the Gas and Heating Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such, the Board will formally approve this policy and review it periodically. The first review will be undertaken 18 months after the approval of this new policy, and then every two years thereafter (or sooner if there is a change in regulation, legislation or codes of practice).
- 3.1.6 The Board will receive regular updates on the implementation of the Gas and Heating Policy and gas safety performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.
- 3.1.7 The SMT will receive reports in respect of gas safety performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.1.8 The housing teams will provide key support in gaining access into properties where access is proving difficult and use standards methods to do so. They will also facilitate the legal process to gain access as necessary.



### **3.2 Competent Persons**

- 3.2.1 GCH will ensure they appoint a competent person/persons who is appropriately qualified; holding a recognised gas safety management qualification. They should have or be working towards gaining the Level 4 VRQ in Gas Safety Management (if they are not Gas Safe Registered), or equivalent, and full membership of the Association of Gas Safety Managers (AGSM). If they do not have these already, they should obtain them within 12 months of the approval of this policy.
- 3.2.2 GCH will ensure that all operatives (internal or employed by external contractors) maintain Gas Safe accreditation for all areas of gas/LPG works that they undertake.
- 3.2.3 GCH will ensure that only suitably competent Gas Safe accredited contractors are procured and appointed to undertake works to gas/LPG fittings, appliances and flues.
- 3.2.4 GCH will ensure that where applicable, only suitably competent Oil Firing Technical Association (OFTEC) and/or HETAS accredited contractors are procured and appointed to undertake works to oil fired and solid fuel fittings, appliances and flues.
- 3.2.5 Other heating types – GCH will ensure that where applicable, only individuals/organisations with a Micro generation Certification (MCS) are procured and appointed to undertake works on ground air source heat pumps, solar thermal and biomass heating systems.
- 3.2.6 The operational team with responsibility for delivery will check the relevant qualifications of employees working for these contractors to ensure that all persons are appropriately qualified and accredited for the work that they are carrying out. These checks will be undertaken on an annual basis and evidenced appropriately.

## **4. POLICY**

### **4.1 Obligations**

- 4.1.1 The Gas Safety (Installation and Use) (Amendment) Regulations 2018 impose duties on landlords to protect tenants' safety in their homes with respect to gas safety. The main duties as a landlord are set out in Regulation 36 requiring landlords to:
  - Ensure gas fittings and flues are maintained in a safe condition. Gas appliances should be serviced in accordance with the manufacturer's instructions. If these are not available it is recommended that they are serviced annually unless advised otherwise by a Gas Safe registered engineer



- Ensure the annual safety check is carried out on each gas appliance and flue within 12 months of the previous safety check
- Have all installation, maintenance and safety checks carried out by a Gas Safe registered engineer
- Keep a record of each safety check for at least 2 (two) years
- Issue a copy of the latest safety check record to existing tenants within 28 days of the check being completed, or to any new tenant when they move in
- Display a copy of the latest safety check record in a common area of a building where the gas appliance serves a communal heating system to multiple homes.

4.1.2 In addition, landlords must ensure that no gas fitting of a type that would contravene Regulation 30 (e.g. certain gas fires and instantaneous water heaters) is fitted in any room occupied or to be occupied as sleeping accommodation after the Regulations came into force. This includes any room converted into such accommodation after that time.

4.1.3 These obligations apply to both gas heating and liquid petroleum gas heating systems.

4.1.4 **Other heating types** – with regards to all other heating types as set out in 1.2 of this policy, although there is no legal requirement for carrying out safety checks, GCH will complete an annual safety check for all properties with these heating types, in exactly the same way as they do for properties with gas and LPG. The competent person will require alternative qualifications which are set out in section 3 of this policy.

#### 4.2 Statement of Intent

4.2.1 GCH acknowledges and accepts its responsibilities under the Gas Safety (Installation and Use) (Amendment) Regulations 2018.

4.2.2 GCH will hold accurate inspection dates and inspection records against each property it owns or manages electronically.

4.2.3 GCH will request the gas/heating engineers visit all properties on an annual basis to carry out gas and/or heating safety checks, irrespective of whether the property has a gas supply or not (other than those properties not on the gas mains network). Additionally,



these properties will be subject to sections 5.5 of this policy irrespective of whether they have a gas supply or not.

- 4.2.4 Where GCH does not hold responsibility for completing the annual gas safety check, leased properties etc. we will ensure that we hold evidence of compliance within our records.
- 4.2.5 GCH will ensure that each property requiring a gas/heating safety check and/or service will have a landlords' gas safety record (LGSR) or equivalent that has a completion date not more than 12 months following the completion date of the previous LGSR (or equivalent) relating to the property or installation date of new installations.
- 4.2.6 GCH will ensure that copies of all LGSRs/certification are provided to tenants within 28 days of completion or displayed in a common area where necessary within 28 days of its completion.
- 4.2.7 GCH will cap off gas supplies to all properties when the property becomes void, and a new tenant is not moving in immediately following the previous tenant leaving. This will be completed by the end of the next working day.
- 4.2.8 GCH will cap off gas supplies to all new build properties at handover if the new tenancy is not commencing immediately at the point of handover.
- 4.2.9 GCH will ensure that gas safety checks are carried out prior to, or immediately following the commencement of any new tenancy (void or new build properties), mutual exchange and/or transfer and that the tenant receives a copy of the LGSR prior to, or immediately after moving in. The exception to this will be where the tenant does not have their own gas supply e.g. independent living schemes or shared supported living properties.
- 4.2.10 GCH will carry out a gas safety check following any new gas appliance installation. The safety check will include a gas soundness test of the system pipework, a visual inspection of the meter installation and a visual inspection including the safe working operation on all other gas appliances and associated flues within a property, issuing a gas safety certificate to confirm the necessary checks have been completed.
- 4.2.11 GCH will carry out a visual check of tenant owned appliances provided that the tenant is able to provide evidence that the appliance has been installed by a Gas Safe Engineer. This includes a 5-point visual safety check for gas cookers and gas fires where the manufacturers'



instructions are available (Location, flueing, ventilation, signs of distress and stable and secure). Where appliances are found to be faulty these will be disconnected, and a warning notice issued. If the tenant is unable to provide this evidence, then the appliance will be capped off until such time it can be deemed safe.

- 4.2.12 GCH will carry out an annual gas safety check to all properties where the gas supply is inactive (capped) at the request of the tenant. This is to ensure that gas supplies have not been reconnected by the tenant. Section 3.5 of this policy will apply to these properties.
- 4.2.13 In any instance where a property has a capped supply GCH will write to the tenants every six months to ensure the property remains capped and inform the tenant of what is required in order to reinstate gas at the property.
- 4.2.14 GCH will carry out annual assessments of properties where tenants have chosen for personal reasons not to use the gas supply in the property. This is to check on the tenant's wellbeing and also to assess that the lack of gas heating is not adversely affecting the condition of the property.
- 4.2.15 GCH will ensure that only suitably competent Gas Safe accredited engineers undertake gas or LPG works for the organisation. See section 3 of this policy for the competency required to carry out safety checks for other heating types.
- 4.2.16 GCH will remove any open flue gas appliances found in any rooms that are being used as bedrooms.
- 4.2.17 GCH will have robust processes and controls in place to ensure that consideration is made when letting properties to the suitability of the accommodation for the prospective customer with regards to gas/heating safety.
- 4.2.18 GCH will have a robust process in place to gain access should any customer refuse access to carry out essential gas/heating safety related inspection and remediation works.
- 4.2.19 GCH will have a robust process in place to gain access to properties where customer vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the customer.





4.2.20 GCH will establish and maintain a plan of all continuous improvement activity undertaken with regards to gas/heating safety.

4.2.21 GCH will ensure that where applicable all solid fuel, chimney stacks, oil fired appliances and flues are inspected and maintained at least annually and that this work is completed by a suitably competent engineer.

### 4.3 Compliance Risk Assessment/Inspection Programmes

4.3.1 **Risk assessment** – GCH will establish and maintain a risk assessment for gas safety management and operations. This risk assessment will set out the organisations' key gas safety risks together with appropriate mitigations.

4.3.2 **Domestic properties** – GCH will carry out a programme of annual gas/heating safety checks and services to all domestic properties, covering all heating types. This check will include all gas/heating fittings, appliances and flues in the property and will be completed 12 months from the date of the previous LGSR/certification. This safety check is driven from the anniversary date of the most recent LGSR/certification which may have been carried out at the start of a new tenancy or following installation of new gas appliances.

4.3.3 GCH will continue to operate under the current legislative regime, but explore the potential benefits of the new changes introduced in April 2018 to Part F, Regulation 36 (3) of the Gas (Installation and Use) Regulations 1998 that provides landlords with some flexibility around the anniversary date of LGSRs. The new change allows the landlord to carry out a new gas safety check within 10 months and 1 day of the previous safety check and retain the original 12 month anniversary date of the previous LGSR, providing it does not exceed this 12 month anniversary date.

4.3.4 **Supported Living Properties** – GCH will carry out a programme of annual gas/heating safety checks and services to all supported living properties (where we have responsibility), covering all heating types. This check will include all gas/heating fittings, appliances and flues in the property and will be completed 12 months from the date of the previous LGSR/certification. This safety check is driven from the anniversary date of the most recent LGSR/certification which may have been carried out at the start of a new tenancy or following installation of new gas appliances. These safety checks and maintenance services will be carried out by a suitably competent





engineer in accordance with the manufacturer's instructions. These installations may include catering equipment, boilers serving communal heating systems, combined heat and power systems, pressure vessels and water heating boilers (this will also apply to independent living schemes, as applicable).

**4.3.5 Communal Blocks and 'Other' properties** – GCH will carry out a programme of annual gas safety checks and services to all 'communal blocks and 'other' properties (offices, etc.), where it has the legal obligation to do so. These checks will include all gas fittings, appliances and flues in the property and will be completed no longer than 12 months from the date of the previous LGSR/certification or as detailed within manufacturer's instructions. These safety checks and maintenance services will be carried out by a suitably competent engineer in accordance with the manufacturer's instructions. These installations may include catering equipment, boilers serving communal heating systems, combined heat and power systems, pressure vessels and water heating boilers.

**4.3.6** GCH will carry out where applicable a programme of annual safety checks and services to all oil fired and solid fuel systems. This check will include all fittings, appliances and flues in the property and will be completed no longer than 12 months from the date of the previous safety check and service or as detailed within manufacturer's instructions or industry best practice. These safety checks and maintenance services will be carried out by a suitably competent engineer in accordance with the manufacturer's instructions.

#### **4.4 Compliance Follow up Work**

**4.4.1** GCH will ensure there is a robust process in place for the management of any follow-up works required following the completion of a gas/heating safety check.

**4.4.2** GCH will test smoke alarms and CO Detection in all domestic properties as part of the annual gas/heating safety check.

**4.4.3** A safety check will be carried out on completion of any repair and/or refurbishment works to occupied or void properties where works may have affected any gas fittings, appliances or flues.

#### **4.5 Record Keeping**

**4.5.1** GCH will establish and maintain a core asset register of all properties that have an active or inactive gas supply. This register will also hold



data against each property asset of gas or other heating inspection and servicing requirements, where applicable, for all domestic properties, communal blocks and 'other' property assets.

- 4.5.2 GCH will hold accurate inspection dates and inspection records against each property it owns or manages as follows:
- 4.5.3 Inspection dates and re-inspection records will be held electronically.
- 4.5.4 GCH will ensure the Gas Safe registered engineer records the details of all appliances and other equipment which is served by the gas/heating supply in every domestic property, communal block or 'other' property.
- 4.5.5 GCH will establish and maintain accurate records of all completed safety records, warning notices and associated remedial works and keep these for a period of not less than two years.
- 4.5.6 GCH will hold and maintain accurate records on the qualifications of all engineers undertaking gas/heating works for the organisation.
- 4.5.7 GCH will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all gas/heating safety related data.

## 5. REGULATORY STANDARDS, LEGISLATION, AND APPROVED CODES OF PRACTICE

- 5.1 **Regulatory Standards** - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH).
- 5.2 **Legislation** - the principle legislation applicable to this policy is 'The Gas Safety (Installation and Use) (Amendment) Regulations 2018. GCH has a legal obligation under Part F, Regulation 36 of the legislation (Duties of Landlords) and is the 'Landlord' for the purposes of the legislation. GCH is the 'Landlord' by virtue of the fact that they own and manage homes and buildings housing tenants/leaseholders through the tenancy, lease and license agreement obligations it has with the tenants/leaseholders.
- 5.3 **Codes of Practice** - the principle approved codes of practice applicable to this policy are:
  - ACoP L56 - 'Safety in the installation and use of gas systems and appliances' (4th edition 2013).



- INDG285 - 'A guide to landlords' duties: Gas Safety (Installation and Use) Regulations 1998 as amended by the Gas Safety (Installation and Use) (Amendment) Regulations 2018'.

- 5.4 **Sanctions** – GCH acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.
- 5.5 **Tenants** – GCH will use the legal remedies available within the terms of the tenancy agreement, lease or license should any tenant refuse access to carry out essential gas safety checks, maintenance and safety related repair works. This will either be following a 'controlled access' process or via 'legal proceedings'.
- 5.6 **Additional Legislation** – This gas and heating safety policy also operates in the context of the following legislation:
- 5.6.1 Health and Safety at Work Act 1974
  - 5.6.2 The Management of Health and Safety at Work Regulations 1999
  - 5.6.3 The Workplace (Health Safety & Welfare) Regulations 1992
  - 5.6.4 Gas Safety (Management) Regulations 1996 (as amended)
  - 5.6.5 The Building Regulations in England & Wales
  - 5.6.6 Dangerous Substances and Explosive Atmospheres Regulations 2002
  - 5.6.7 Pressure Equipment Regulations 1999
  - 5.6.8 Pressure Systems Safety Regulations 2000
  - 5.6.9 Pipelines Safety Regulations 1996
  - 5.6.10 Heat Network Regulations 2014
  - 5.6.11 Health and Safety (Safety Signs and Signals) Regulations 1996
  - 5.6.12 Provision and Use of Work Equipment Regulations 1998
  - 5.6.13 Construction, Design and Management Regulations 2015
  - 5.6.14 Landlord and Tenant Act 1985
  - 5.6.15 Data Protection Act 2018



5.6.16 RIDDOR 2013

5.7 This policy also links to the following GCH Policies:

5.7.1 Health and Safety Policy

5.7.2 Data Archival, Retention and Disposal Policy

## 6. IMPLEMENTATION

### 6.1 Training

- 6.1.1 GCH will ensure that all operatives working for, or on behalf of the organisation have the relevant training required for their role. This will be managed via periodic assessments of training needs and resulting programmes of internal and/or external training.

### 6.2 Performance Reporting

- 6.2.1 Robust key performance indicator (KPI) measures will be established and maintained to ensure GCH is able to report on performance in relation to gas/heating safety.
- 6.2.2 KPI measures will be produced and provided at SMT level on a monthly basis and at Board level on a quarterly basis. As a minimum these KPI measures will include reporting on:

#### **Data – the total number of:**

- Properties – split by communal blocks and 'other' properties
- Properties on the gas/heating servicing programme
- Properties not on the gas/heating servicing programme
- Properties with a valid 'in date' LGSR/certification. This is the level of compliance
- Properties where the LGSR/certification has expired and is 'out of date'. This is the level of non-compliance
- Properties which are due to be serviced within the next 30 days. This is the early warning system.

#### **Narrative - an explanation of the:**

- Current position
- Corrective action required
- Anticipated impact of corrective action
- GCH with completion of follow-up works



6.2.3 GCH will carry out independent third party quality assurance audits of gas/heating safety checks, gas appliance services and gas appliance repair works. This will be a 5% sample of the total gas safety works carried out. In addition 100% of all certifications will be checked Compliance Document Management System (CDMS).

6.2.4 GCH will carry out an independent audit of gas/heating safety at least once every two years. This audit will specifically test for compliance with the regulation, legislation and approve codes of practice and identify any non-compliance issues for correction.

### **6.3 Non-Compliance/Escalation Process**

6.3.1 Any non-compliance issue identified at an operational level will be formally reported to SMT in the first instance.

6.3.2 The SMT will agree an appropriate course of corrective action in order to address the non-compliance issues.

6.3.3 The SMT will ensure the Board are made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

6.3.4 In cases of a serious non-compliance issue the SMT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation as part of the Regulatory Framework.

## **7. CONSULTATION**

7.1 A series of consultation meetings have taken place when reviewing this policy, including a policy principles session with Group Board.

## **8. REVIEW**

8.1 Ordinarily this policy will be reviewed following GCH standard three yearly timeframe. However, an initial review timeframe of eighteen months (from February 2024, when the compliance roadmap is due to be completed) is being adopted to ensure that any changes required, following the implementation of new systems and processes, can be captured at the earliest opportunity.

## **9. EQUALITY IMPACT ASSESSMENT**

9.1 An EIA is currently being drafted alongside this policy review.