

# Gas and Heating Safety Management Policy

## 1.0 Introduction

- 1.1 Beyond Housing recognises the potential risk associated with the installation, maintenance and use of renewable energy, and fossil fuel burning appliances and heating systems. These include the risk of fire, explosion and carbon monoxide poisoning arising from poor installation, irregular maintenance or possible damage or tampering to appliances and systems.
- 1.2 The Gas Safety (Installation and Use) Regulations 1998 imposes a duty and legal obligation on Beyond Housing as a landlord and employer of gas engineers, this includes engineers employed directly and indirectly.
- 1.3 Compliance with the requirements of this policy is mandatory and will ensure that we discharge our statutory duties with respect to:
  - Health and Safety at Work etc. Act, 1974
  - Gas Safety (Installation and Use) Regulations 1998
  - Landlord and Tenant Act 1985
- 1.4 **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 Regulator of Social Housing (RSH)

## 2.0 Statement of Intent

- 2.1 This Policy applies to all persons employed to undertake activities on behalf of Beyond Housing, and includes all properties within our commercial and residential property portfolios.

With this aim, we will ensure that management arrangements are established, maintained and promoted to ensure continual improvement across the operation of its services by:

- Implementation of an organisational structure with clear roles and responsibilities for the management of gas and heating management safety
- Ensuring that the risks posed by fire, explosion and carbon monoxide poisoning are assessed and adequately controlled to reduce the residual risks to a negligible/tolerable level

- Ensuring mechanisms to prevent, so far as is reasonably practicable, the occurrence of fire, explosion and carbon monoxide poisoning within the buildings that we own or manage
- Promoting awareness of the risks posed by fire, explosion and carbon monoxide poisoning and the relevant actions to be taken in the event of a such an incident by the provision of adequate information, instruction and training
- Providing adequate resources to ensure effective management of gas and heating safety
- Monitoring compliance with the requirements of the Gas and Heating Safety Management Policy.

Signed:  Date: 5 August 2021  
Rosemary Du Rose, Chief Executive

Signed:  Date: 5 August 2021  
James D Hayward RD, Chair of Board

## 3.0 Objectives

3.1 Beyond Housing will ensure that measures are established to:

- Hold accurate inspection and maintenance records, and dates against each property it owns or manages, for 6 years.
- Ensure a robust management system is in place to manage the delivery of safety checks, planned preventative maintenance and installation of gas and heating systems.
- Ensure that each property to which a duty applies has a gas safety check carried out within 12 months of the previous gas safety check, commencing from the date the tenancy commenced or the date the installation was new.
- Ensure that copies of all LGSRs are provided to tenants or displayed in a common area within 28 days of completion.
- Implement robust processes to ensure that any additional or follow on works are carried out.

## 4.0 Scope

4.1 The Gas and Heating Safety Management Policy applies to all properties owned and managed by Beyond Housing with the exception of leasehold properties where the duty holder is the leaseholder.

4.2 The Gas and Heating Safety Management Policy covers all equipment that provides space and hot water heating in our domestic and non-domestic assets. This includes:

- Natural and liquefied petroleum gas (Nat gas & LPG)
- Oil
- Solid fuel
- Air and ground source heat pumps
- Solar thermal hot water

4.3 Beyond Housing's statutory duties include the servicing and maintenance of:

### **Domestic residential properties**

- Assisted living premises
- General needs multi occupancy residencies with common areas
- Ancillary rooms (lift / machinery plant room's electric distribution rooms, store rooms etc.)
- New build properties
- Refurbishment projects.

### **Non-domestic commercial properties**

- Office buildings

- Depots/stores
- Community centres
- Commercial premises.

4.3 The requirements of this policy are also applicable to all repairs / maintenance and planned works activities.

## 5.0 Definitions

5.1 **LGSR** is a *Landlord Gas Safety Record* that Regulation 36 ‘Duties of Landlords’ of the gas safety (Installation and Use) Regulation 1998 requires landlords to provide their tenants within 28 days of the safety check being carried out.

5.2 **GSUR** The Gas Safety (Installation and Use) Regulations 1998 deals with the safe installation, maintenance and use of gas systems, gas fittings, appliances and flues, mainly in domestic and commercial premises, e.g. offices, shops, public buildings and similar places.

5.3 **IGEM** is the *Institution of Gas Engineers and Managers* a recognised body of gas industry experts that publish a range of guidance documents for gas engineers and businesses.

5.4 **GIUSP** The *Gas Industry Unsafe Situations Procedure* is a procedure for the use of Gas Safe registered businesses and engineers when dealing with unsafe situations in domestic and non-domestic premises supplied with natural gas or liquefied petroleum gas

5.5 **CO - Carbon Monoxide** is a toxic, colourless, odourless, and tasteless gas that is slightly less dense than air, and is a product of the incomplete combustion of fossil fuel burning appliances.

5.6 **LPG - Liquefied Petroleum Gas**, stored in bottles or tanks and is used to fuel gas boilers and fires.

5.7 **Mutual Exchange** is where two tenants swap each other’s property and tenancy. The tenancy does not legally end. Practically it means both tenants must move out of their property and into the new one on the same day.

5.8 **Immediate Re-let** is where a tenancy ends on any day and a new tenant moves in the same day. Practically the outgoing tenant has until 12 noon on the agreed date to vacate the property.

## 6.0 Responsibilities

6.1 The **Board** is responsible for ensuring that an adequate system of internal control exists across the organisation. The **Board** will also:

- Provide scrutiny and challenge to ensure internal control environment is operating effectively.

- Consider and approve strategies/policies and resource allocation as necessary to ensure the Beyond Housing maintains robust safety arrangements.

6.2 The **Chief Executive** is with reference to the Corporate Health & Safety Policy directly responsible for the health, safety and wellbeing of all employees and any others who may be affected by Beyond Housings undertakings, therefore in relation to this policy the **Chief Executive** will:

- Maintain a broad awareness of current statutory requirements and principles of good practice which are relevant to the Beyond Housings undertakings
- Ensure adequate resources are made available to administer, co-ordinate and implement this Policy
- Ensure Gas and Heating safety management performance is reviewed on a regular basis and reported to the **Board**

6.3 The **Chief Operations Officer** is responsible for strategic and financial management for the delivery of services within the property and development directorate. They are responsible for ensuring that effective compliance assurance systems are established and maintained. The **Chief Operations Officer** will:

- Ensure adherence to the gas and heating safety management policy is maintained across Beyond Housing
- Ensure that robust gas and heating safety management systems, arrangements and organisational responsibilities are established for each operational department
- Ensure appropriate departmental resources are available to administer, co-ordinate and implement this policy
- Ensure that compliance performance is reported to the **Executive Directorate Team** on at least a monthly basis

6.4 The **Director of Property and Commercial Operations** has delegated responsibility for providing strategic leadership, direction and overview of Beyond Housing's gas and heating safety management policy and supporting arrangements and will:

- Maintain a broad awareness of current statutory requirements and principles of good practice for gas and heating safety management
- Consult with the **Executive Directorate Team** (EDT) and wider **Leadership Team** (LT) as necessary to ensure adequate resources and facilities are allocated to achieve the objectives of the gas and heating safety management policy
- Ensure that effective communication exists for gas and heating safety between all departmental and operational functions
- Ensure that gas and heating safety updates/performance reports are provided to the **Executive Directorate Team** on at least a monthly basis and to the **Board** on at least a quarterly basis

6.5 The **Director of Property and Commercial Operations** is responsible for the allocation of operational resources and overall management of the operational teams undertaking planned, investment, responsive repair and void activities, whilst ensuring compliance with regulatory requirements and corporate policy. The **Director of Property and Commercial Operations** will:

- Ensure adherence to this Policy is maintained
- Ensure that robust management systems, arrangements and organisation are in place
- Ensure that sufficient resources and processes are in place to capture, review, prioritise and respond to any significant findings
- Ensure sufficient resources are allocated to enable effective planned preventative maintenance and cyclical servicing regimes for safety systems and building infrastructure are in place and maintained
- Ensure that sufficient resources are allocated enabling access management arrangements to be undertaken in line with the access procedure.
- Ensure appropriate departmental resources are available to administer, co-ordinate and implement this Policy

6.6 The **Director of Development** is responsible for - for leading Development and Regeneration activities, developing and managing external relationships and business development, whilst ensuring compliance with regulatory requirements and corporate policy. The **Director of** will:

- Ensure adherence to this Policy is maintained
- Ensure during the specification, design, development, and build phase that gas and heating installations are installed, checked for quality and compliance, in a manner that supports this policy.

6.7 The **Compliance Team** is responsible for leading, directing and managing the compliance function and support the head of asset management to design and deliver policies and programmes to maintain robust property compliance across Beyond Housing's domestic and non-domestic property portfolios. The **Compliance Team** will:

- Ensure adherence to this policy is maintained
- Monitor statutory compliance regularly
- Ensure effective and up to date, processes and procedures are in place
- Ensure operational services meet accreditations and regulatory requirements
- Sample check and validate compliance documentation
- Audit systems, processes and documentation to ensure compliance against statutory requirements, corporate policy and procedural arrangements.

6.8 The **Compliance Operations Team** is responsible for leading and managing operational teams to deliver cyclical safety checks, planned and responsive work associated with plumbing, gas and heating appliances and installations, whilst ensuring compliance with regulatory requirements and corporate policy. The **Compliance Operations Team** will:

- Ensure adherence to this policy is maintained
- Monitor statutory compliance regularly
- Develop, implement, monitor, follow and keep up to date processes to ensure the robust management and delivery of cyclical, planned and responsive gas and heating work, and compliance against statutory requirements, corporate policy and procedural arrangements.
- Ensure that access management arrangements are undertaken in line with the access procedure.
- Ensure operational services meet accreditations and regulatory requirements
- Ensure managers, supervisors and engineers are appropriately qualified to undertake the work they are employed to do, and that the qualifications are up to date and valid.
- Escalate incidents or significant issues, which pose a potential risk of non-compliance or the safety of persons to the **Health and Safety Team** and the Compliance Team.
- Follow the manufacturer's installation instructions, industry best practice and Beyond Housing procedures when undertaking their work activities
- Report to the **Health and Safety Team** and the Compliance Team faults, hazards, unsafe practices, accidents, adverse incidents, dangerous occurrences and near misses whether injury is sustained or not.

6.9 The **Health and Safety Team** fulfil the role of competent persons as required by Management of Health and Safety at Work Regulations 1999 (Regulation 7). The **Health and Safety Team** has specific responsibility for:

- Liaising with the **Board, Executive Directorate Team** and Head of Governance and Business Support in the development of appropriate controls in the management of health and safety risks
- Advising on and contributing to the development of policies and procedures which could have an impact on health and safety matters, ensuring that documentation is legislatively compliant
- Monitoring health and safety performance of the Beyond Housing and making regular reports
- Periodically monitoring and auditing the implementation of the gas and heating safety management policy across Beyond Housing
- Ensuring that appropriate health and safety audits and inspections are carried out in all areas.

## 7.0 Gas and Heating safety management arrangements

7.1 Beyond Housing will hold accurate records of maintenance and inspection of gas/heating fittings, appliances and flues including scheduled inspection dates for systems requiring an annual LGSR.

7.2 Beyond Housing will ensure that each property to which a duty applies has a gas safety check carried out within 12 months of the previous gas safety check, commencing from the date the tenancy commenced or the date the installation was new.

7.3 Beyond Housing will visit all properties on an annual basis to carry out checks on smoke alarms, irrespective of whether the property is known to have a gas supply or not. During these visits

the property will be surveyed to ensure that any solid fuel or gas (Natural or LPG) appliances identified are captured by the solid fuel or gas cyclical servicing programme.

- 7.4 Beyond Housing will implement a robust process for cases where access is refused to carry out essential gas/heating safety work. This process will include the option to use legal methods to gain access.
- 7.5 Beyond Housing will ensure that there are robust processes in place make sure that any additional or follow on works are completed.
- 7.6 Beyond Housing will carry out a gas safety check following the commencement of any new tenancy.
- 7.7 Beyond Housing will carry out a full gas safety check, including all existing gas appliances, following the installation any of new gas boiler, or heating system.
- 7.8 Beyond Housing will carry out an annual gas safety check to all properties where the gas supply has been previously capped at the request of the tenant, to ensure it remains safe.
- 7.9 Beyond Housing will cap off gas supplies to all properties when they become void.
- 7.10 Beyond Housing will cap off gas supplies to all new build properties at handover if the new tenancy does not commence at the point of handover.
- 7.11 Beyond Housing will make arrangements for an annual test of smoke and CO alarms and replace faulty or expired ones.
- 7.12 Beyond Housing will ensure that solid fuel appliances and flues are inspected and maintained, and where applicable that chimneys are swept at least biannually.
- 7.13 Beyond Housing will ensure that oil fired appliances, flues and oil tanks are inspected, maintained and checked for safety within 12 months or the previous safety check.
- 7.14 Beyond Housing will carry out an oil safety check prior to commencement of each new tenancy.
- 7.15 As part of the LGSR, Beyond Housing engineers will carry out a visual assessment of customer's own gas cooking appliances as defined in the GIUSP IGEM/G/11, and where appliances are found to be defective disconnect and issue a warning notice.
- 7.16 Beyond Housing will adopt the tenants own gas fire to ensure it is included in the annual gas safety check; it is repaired, maintained and safe to use.
- 7.17 Beyond Housing will remove any open flue gas appliances found in rooms that are being used or to be used as sleeping accommodation. Where the gas appliance has a heat input greater than



12.7 kW net (14kW Gross), or less than 12,7kW but does not incorporate a safety control designed to shut down the appliance before dangerous quantities of products of combustion built up in the room.

- 7.17 Beyond Housing will prohibit the use of fixed or mobile natural gas or LPG flueless gas fires or heaters, or LPG stoves and bottled gas, and enforce removal.
- 7.18 Beyond Housing will refuse permission for the installation of solid fuel burning appliances on the grounds of safety, economics and public nuisance and the enforcement for the removal of any installations installed without permission, where the property is connected to a mains gas network.
- 7.19 Beyond Housing will remove solid fuel appliances in occupied properties where it is a secondary appliance and when they become uneconomical to repair, and brick the fire opening in order to remove the risk of carbon monoxide poisoning and associated costs with on-going maintenance, whilst at the same time fitting a radiator in the room from which the solid fuel appliance was removed, when one doesn't exist. An electric point will be fitted for the tenant to fit their own electric fire.
- 7.20 Beyond Housing will remove solid fuel appliances in all void properties or before a property is mutually exchanged where it is a secondary appliance and brick up the fire opening to remove the risk of carbon monoxide poisoning and associated costs with on-going maintenance, whilst at the same time fitting a radiator in the room from which the solid fuel appliance was removed, when one doesn't exist. An electric point will be fitted for the tenant to fit their own electric fire.
- 7.21 Beyond Housing will sweep the chimney and carry out a solid fuel safety check prior to the commencement of each new tenancy, where a solid fuel heating appliance cannot be replaced with a gas fired appliance.
- 7.22 Beyond Housing will refuse permission for the installation of all gas fires on the grounds of safety and economics including the enforcement for the removal of any installations installed without permission.
- 7.23 Beyond Housing will remove gas fires in all void properties or before a property is mutually exchanged and brick up the fire opening to remove the risk of carbon monoxide poisoning and associated costs with on-going maintenance, whilst at the same time fitting a radiator in the room from which the gas fire was removed, when one doesn't exist. An electric point will be fitted for the tenant to fit their own electric fire.
- 7.24 Beyond Housing will remove gas fires in occupied properties when they become uneconomical to repair, and brick the fire opening in order to remove the risk of carbon monoxide poisoning and associated costs with on-going maintenance, whilst at the same time fitting a radiator in the room

from which the gas fire was removed, when one doesn't exist. An electric point will be fitted for the tenant to fit their own electric fire.

- 7.25 Beyond Housing will prohibit the installation of gas cooking appliances in flats, apartments or multiple occupied premises whereby residents have self-contained dwellings, and the removal of gas cooking points by means of capping when properties become void. Note: This will be done on an individual assessment basis, and only when the electrical installation has the load capacity to accommodate the installation of an electric cooker.
- 7.26 Beyond Housing will install Carbon Monoxide Alarms in all properties with fossil fuel burning appliances such as gas, solid fuel, Oil, open flued and flueless gas appliances; and situations which have been risk assessed due to concerns about the potential migration of CO from a neighbouring property.
- 7.27 Beyond Housing will ensure that all other heating types' i.e. electric, solar voltaic, solar thermal, air source, ground heat pumps and unvented hot water systems are serviced and checked for safety in accordance with the manufacturer's instruction.
- 7.28 Beyond Housing will ensure that for properties rented on leasehold basis i.e. retail shops, fast food catering establishments or other similar premises the leaseholder provides an annual gas safety certificate.

## **8.0 Gas and Heating information, instruction and training**

- 8.1 Beyond Housing will ensure that only suitably competent consultants, surveyors, risk assessors and engineers undertake works for the organisation in respect of gas and heating safety.
- 8.2 Beyond Housing will ensure that steps are taken to confirm those employed either directly as a manager, supervisor or engineer, or indirectly as a contractor, sub-contractor, designer or consultant, hold appropriate qualifications and competencies enabling them to undertake the work they are employed to do.
- 8.3 Beyond Housing will provide sufficient and appropriate competent supervision and monitoring.

## **9.0 Information for customers**

- 9.1 Beyond Housing will ensure that copies of all LGSRs are provided to customers within 28 days of completion.

## **10.0 Performance monitoring and non-compliance**

- 10.1 Beyond Housing is fully committed to continuous development and improvement of gas and heating safety performance. In order to meet this commitment, performance reporting in relation to gas and heating safety will be regularly reported to the **Executive Directorate Team** and wider **Leadership Team**
- 10.2 The performance reporting may include the total number of:
- Number of properties, split by 'non domestic - communal blocks' and 'other assets'
  - Properties on the gas and heating safety programme
  - Properties not on the gas and safety heating programme
  - Properties with a valid 'in date' LGSR - level of compliance expressed as a number and percentage
  - Properties where the LGSR has expired and is 'out of date' - level of non-compliance expressed as a number
- 10.3 Investigate and report any incident that results in an Immediately Dangerous or At Risk Situation as defined in the IGEM/G/11 Gas Industry Unsafe Situation Procedure (GIUSP) to learn lessons and collect trend data in order to prevent a reoccurrence, and where required RIDDOR reported by the Health and Safety Team.
- 10.4 The **Compliance Team** will periodically monitor the performance of planned preventative maintenance regimes and responsive repairs to ensure that gas and heating safety systems are maintained across Beyond Housing
- 10.5 In order to provide adequate assurance of asset information held, Beyond Housing will periodically undertake an asset data review to ensure that gas and heating safety data is accurate and up to date.
- 10.6 In the event that a non-conformance issue is identified it will be immediately reported to the **Director of Property and Commercial Operations** and the **Director of Governance and Assurance**
- 10.7 The **Director of Property and Commercial Operations** and the **Director of Governance & Assurance** with the assistance of the **Health and Safety Team** will agree an appropriate course of corrective action in order to address any non-compliance issues, and report details to the **Executive Directorate Team**.
- 10.8 The **Executive Directorate Team** will ensure the **Board** are made aware of any non-compliance issues so they can consider the implications and take action as appropriate
- 10.9 In the case of a major non-compliance issue the **Executive Directorate Team** 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

- 10.10 The **Health and Safety Team** will periodically monitor the implementation of this policy and supporting procedures
- 10.11 An independent audit of gas and heating safety arrangements will be undertaken at least once every two years
- 10.12 In addition to the performance reporting Beyond Housing undertakes compliance assurance audits which are reported to the **Executive Directorate Team** and compliance forum.
- 10.13 A Specialist Gas Auditor will be appointed to provide scrutiny of gas work carried out which includes gas safety checks, gas repairs, new gas boilers and heating installations. A post audit will be carried out across all work streams and a work in progress audit carried out on each engineer annually.

## 11.0 Review

- 11.1 This policy will be subject to a review every three years or in the instance that:
- Changes to existing or the introduction of new legislation
  - Changes to existing or the introduction of new Approved Codes of Practice / guidance
  - Changes to the Beyond Housing's organisational structure
  - Results of monitoring or audit findings which suggest that a review may be required
  - The findings of a major incident investigation
  - A request by the enforcing authorities (Health & Safety Executive, Fire and Rescue Service).
- 11.2 It will be the responsibility of the **Director of Property and Commercial Operations** to:
- Assess any request for the review of the policy and associated procedures
  - Consult with stakeholders regarding the proposed changes
  - Undertake a review and update the policy and procedures as required
  - Retain records of changes to the policy and procedures for future reference and audit as required.