

## Group Gas Safety Policy

If you need any information in a different format, for example large print, Braille, audio file or another language, please email [Communications@housing21.org.uk](mailto:Communications@housing21.org.uk)

|  |   |
|--|---|
| <b>Version number</b>                      | 7   |
| <b>Issue date</b>                          | June 2025   |
| <b>Review date</b>                         | June 2028   |
| <b>Board approval required?</b>            | Yes   |
| <b>If yes, date approved by Board</b>      | May 2025  |
| <b>Author’s name and job title</b>         | Alicia Wheeler, National Health and Safety Manager  |
| <b>Policy owner and job title</b>          | Sarah Smith, Head of Group Property Compliance  |
| <b>Reviewed by</b>                         | Richard Smith, Environmental Health Practitioner<br>South Cambridgeshire District Council |
| <b>Policy Steering Group approval date</b> | July 2025   |

### Summary

The purpose of this policy is to ensure the safety of people in properties owned or managed by Housing 21 that have gas-fuelled heating appliances ('gas appliances'). Gas appliances and their associated chimneys and flues can pose a serious risk to health if they are not properly installed and maintained. We aim to protect the occupiers of our properties, as well as other residents, employees, contractors, and visitors from the risks of gas so far as is reasonably practicable.

Housing 21 service and repair all gas appliances and systems installed and owned by the organisation, whether in a resident’s home or in a communal area. These responsibilities may extend to the properties we manage on behalf of other landlords, depending on the arrangements in place for those properties.

The annual gas inspection also extends to properties with no gas appliances where there is an inactive gas meter or service pipe which requires inspection. Residents must remember that they are responsible for the condition and safety of their own appliances.

### Equality, Diversity, and Inclusion

Housing 21 aspires to embed diversity and inclusion within all our organisational activities to enable these principles to become part of our everyday processes.

# Contents

## Legislation and Regulations

1. SCOPE
  - 1.1 Legal and Regulatory Framework
  - 1.2 Oldham PFI and Kent PFI
  - 1.3 Aims, Objectives and Approach
  - 1.4 Delivering Excellent Service
  - 1.5 Gas Equipment
  - 1.6 Record Retention
  - 1.7 Contractors
  - 1.8 Quality Assurance
  - 1.9 Data Management and Performance
  - 1.10 Resident Engagement
  - 1.11 Significant Non-compliance and Escalation
2. ROLES AND RESPONSIBILITIES
3. CONTRACTORS PERFORMANCE
4. CONSULTATION
5. ASSOCIATED GUIDANCE DOCUMENTS

|   |
|---|
| <b>Legislation and Regulations</b>  |
| The principle legislative and regulatory documents applicable to this policy        |
| Gas Safety (Installation and Use) Regulations 1998 (GSIUR) as amended (2018)        |
| The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022                    |
| Health and Safety at Work etc. Act 1974   |
| Management of Health & Safety at Work Regulations 1999                              |
| Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 |
| Dangerous Substances and Explosive Atmosphere Regulations 2002                      |
| <b>British Standard/Guidance</b>  |
| British Standard 7967   |

## 1. SCOPE

Housing 21 acknowledges and accepts its responsibilities under the Gas Safety (Installation and Use) Regulations 1998 and will:

- 1.1 hold accurate records against each property it owns or manages setting out the requirements for gas safety checks and servicing of all gas fittings, appliances, and flues.
- 1.2 carry out periodic gas reconciliations to ensure adequate assurance that gas supply data held against the organisation's property assets is accurate and up to date.
- 1.3 ensure that each property requiring a gas safety check and/or service (including capped components) will have a landlords' gas safety record (LGSR) that has a completion date not more than 12 months following the completion date of the previous LGSR relating to the property or installation date of new installations.
- 1.4 ensure that where properties are served by individual gas appliances, copies of all LGSR/s are provided to residents within 28 days of completion or, where there is a communal gas appliance the certificate will be displayed in a common area where necessary upon completion of the LGSR.
- 1.5 will manage (see management procedures document) gas supplies to all properties when they become void. If a property is to be void for more than 30 days, the gas supply will be capped off. An LGSR must be completed and the gas supply turned on prior to being relet with a copy supplied to the resident and to the Property Compliance Team.
- 1.6 manage (see management procedures document) gas supplies to all new build properties at handover if the new tenancy is not commencing immediately at the point of handover.
- 1.7 ensure that gas safety checks (see management procedures document) are carried out prior to the commencement of a new tenancy and/or transfer and that the resident receives a copy of the current LGSR at the start of their tenancy.
- 1.8 carry out a five-point safety check for gas cookers and service to gas fires owned by residents where the manufacturers' instructions are available (location/flueing/ventilation/signs of distress/stable and secure). Where appliances are found to be faulty these will be disconnected, and a warning notice issued.
- 1.9 test and replace as necessary all carbon monoxide detectors as part of the annual gas safety check visit.
- 1.10 carry out an annual gas safety check to all properties where the gas supply is inactive (capped) at the request of the resident. This is to ensure that gas supplies have not been reconnected by the resident.
- 1.11 Operational teams will carry out annual assessments of properties where residents have chosen for personal reasons not to use the gas supply in the property. This is to check the resident's wellbeing and to assess that the lack of gas heating is not adversely affecting the condition of the property.

- 1.12 ensure that only suitably competent Gas Safe accredited engineers undertake gas works for the organisation.
- 1.13 carry out a gas safety check and issue a new LGSR for the component following the installation of a new gas appliance.
- 1.14 in respect of shared-ownership properties:
  - Housing 21 properties with leases granted before 12 July 2019: not service or maintain gas appliances where the resident retains responsibility under the terms of the lease.
  - Housing 21 properties with leases granted after 12 July 2019: service and maintain gas appliances where Housing 21 retains responsibility under the terms of the lease.
  - For properties acquired by the organisation, responsibility will be defined as per the terms of the individual lease.
- 1.15 ensure that robust processes and controls are in place to manage works to void and occupied properties that may affect existing gas installations.
- 1.16 have in place a robust process to gain access to all properties including where resident vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property to be compliant with this policy and safeguard the wellbeing of the resident.
- 1.17 ensure that where applicable, all solid fuel, chimney stacks, oiled fire appliances and flues that are the responsibility of Housing 21 are inspected and maintained at least annually and that this work is completed by a suitably competent engineer.
- 1.18 ensure that all gas-safety void inspection processes are followed and that carbon monoxide and smoke detector checks are carried out at the start of a new tenancy

## **1.1 Legal and Regulatory Framework**

Housing 21 is committed to complying with the requirements of the Gas Safety (Installation and Use) Regulations 1998, which imposes 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 an 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 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.

The application of the policy will ensure compliance with the Regulator of Social Housing's regulatory framework and consumer standards (Safety and Quality) for social housing in England.

## 1.2 Oldham PFI and Kent PFI

The Oldham and Kent portfolio are managed under PFI contracts. While there are some variations required due to differences in ownership and funding streams, our principles of ensuring statutory compliance remain the same.

Whilst compliance of these PFI contracts is managed outside of Housing 21's Property Compliance team, group assurance is obtained through reporting and review alongside Housing 21 core compliance reports.

Further information for Oldham PFI and Kent PFI can be obtained through the Oldham PFI and Kent PFI employees detailed in this policy.

## 1.3 Aims and Objectives

Housing 21 will ensure the safe maintenance of gas appliances, flues and installation pipework installed, and solid/LPG fuel systems in premises under its control via an ongoing programme of regular/periodic inspections, together with any necessary remedial work. This will include specific maintenance requirements defined in manufacturer instructions or where this is not available via a check of the physical condition of the appliance, installation pipework, air vents and any flue deterioration, testing, and remedial action.

Housing 21 has detailed monitoring arrangements in place to identify any properties where an annual check has not yet been completed due to residents refusing access. Where residents refuse access, the [No Access Procedure will be followed](#).

## 1.4 Delivering Excellent Service

When gas service and safety inspections are carried out:

- 1.4.1 Gas contractors will provide Housing 21 with a copy of the safety record within 7 days so that we know the gas in residents' home is safe.
- 1.4.2 Gas contractors will disconnect or isolate any potentially dangerous appliances and inform the relevant department immediately.
- 1.4.3 If a service cannot be completed due to a defect, the contractor will liaise with the onsite Scheme Manager and the Compliance Team to seek authorisation to carry out the repairs whilst they are on site. Once authorised, the onsite Housing Manager should provide the contractor with a works order number to complete the repairs.
- 1.4.4 If an appliance is unsafe, it should be repaired immediately or shut off until it can be repaired. If repairs cannot be completed the contractor will contact Housing 21 to consider replacement.
- 1.4.5 If properties are left without heating overnight, temporary heating will be arranged as a matter of urgency if the loss occurs between 1 October and 31 March or if the resident is considered vulnerable.
- 1.4.6 If a resident's own gas appliance is found to be defective and dangerous when the contractor carries out a basic check, the appliance will be disconnected and a warning notice issued. The resident and Scheme

Manager will be advised immediately of the defect and the resident advised it is their responsibility to carry out the necessary repair.

Note: Commercial boilers are serviced in accordance with the manufacturer's recommendations.

### 1.5 Gas Equipment

Some Housing 21 schemes have catering facilities with gas-powered equipment and gas-powered tumble driers in their communal laundry facilities. All gas equipment and services will only be installed, maintained, and repaired by a Gas Safe registered installer appointed by Housing 21.

The Property Compliance Team will maintain a register of gas appliances e.g., gas tumble dryers, gas cookers, extraction canopies with gas interlocks within catering kitchens to ensure appliances are checked by competent qualified gas engineers on a regular basis and effective maintenance following the manufacturer's instructions.

All gas safety examination records and documentation will be made available during food and safety inspections.

### 1.6 Record Retention

Housing 21 will maintain records of all annual safety checks undertaken for a minimum period of two years from the date of the inspection and ensure residents receive a copy of the Landlords Gas Safety Record (LGSR) as soon as is reasonably practicable (either electronically or in paper copy) after the safety check and no more than 28 days after the inspection.

### 1.7 Contractors

Housing 21 appoints Gas Safe Register contractors to inspect and service all Housing 21 gas appliances and systems every 12 months. In addition to the annual gas servicing programme, Gas Safe Register contractors also cover day to day maintenance and repairs.

### 1.8 Quality Assurance

Quality assurance is implemented in line with Housing 21's Board Assurance Framework principles.

#### 1.8.1 First line of defence:

- Gas safety policies and procedures are in place and updated within agreed timescales
- Role-appropriate gas safety training is provided where required
- Gas safety risks are well understood and managed at an operational and corporate level
- Performance against defined KPIs are regularly reported to Housing 21's Executive Management Team, Safety Forum and Board

#### 1.8.2 Second line of defence:

- Management oversight of gas safety is provided as per the roles and responsibilities defined in the Group Gas Safety Policy
- Gas safety reporting provides assurance to management and aligned to regulatory requirements where necessary (e.g. Tenant Satisfaction Measures)

### 1.8.3 Third line of defence:

- Housing 21 instructs the NICEIC to carry out monthly independent external audits against post-inspection gas servicing. The NICEIC will audit a sample of domestic boilers and commercial plant rooms to check the quality of work in line with the necessary regulations. The NICEIC alternate between gas contractors on a cyclical basis. Findings are reported to the Health and Safety Forum.
- Additional independent assurance of Housing 21's approach to managing gas safety will be arranged via external audits as per Housing 21's audit schedule

## 1.9 Data Management and Performance

Property Compliance data is managed in line with the Asset Management and Property Compliance Data Framework, which identifies key data, its source, reporting requirements, accuracy checks and owners. The framework is reviewed annually by the Head of Data and Governance, Head of Group Property Compliance and National Compliance Manager to ensure it still meets requirements.

Performance against the following KPI will be regularly reported to the Board, Safety Forum, Investment Development Committee and on Housing 21's quarterly scorecard:

- % of gas appliances with a gas safety check no more than 12 months old (calculated to exact date)

A summary of the NICEIC audit findings will also be regularly reported to the Safety Forum.

## 1.10 Resident Engagement

General information about gas safety, Housing 21's approach to managing it and residents' responsibilities is available via Housing 21's Building and Fire Safety Guide online and in booklet format. Further gas safety communications will be provided as and when required.

## 1.11 Significant Non-compliance and Escalation

Housing 21's definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety. All significant non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Housing 21 employee being made/becoming aware of it.

Any incidents identified at an operational level should be formally reported via the ERICA accident/incident reporting system and the process followed which will include investigating the incident and preventing recurrence.

In cases of serious non-compliance, EMT and the Board will review the issue in line with regulatory frameworks and decide if it warrants disclosure to the Regulator of Social Housing, Health and Safety Executive and/or any other relevant organisation.

| <b>ROLES AND RESPONSIBILITIES</b>  |   |
|--|---|
| <b>2.1</b>   | <b>The Board</b>  |
| Are responsible for:   |   |
| <ul style="list-style-type: none"> <li>• Overall governance for ensuring the Gas Safety policy is fully implemented to ensure full compliance with regulatory standards, legislation, and approved codes of practice.</li> <li>• The Board will formally approve this policy and review it every three years (or sooner if there is a change in regulation, legislation, or codes of practice).</li> <li>• The Board will receive regular updates on the implementation of this policy and gas safety compliance performance, together with notification of any non-compliance issues identified.</li> </ul> |   |
| <b>2.2</b>   | <b>Executive Management Team/Safety Forum</b>   |
| The Executive Management Team (EMT) will receive regular reports on the compliance with the policy and ensure performance is being achieved, together with notification of any non-compliance issues identified.   |   |
| <b>2.3</b>   | <b>Chief Executive and Deputy Chief Executive</b>   |
| The Chief Executive retains the overall responsibility for the implementation of this policy.  |   |
| The Deputy Chief Executive is responsible for ensuring that adequate resources are made available to enable the objectives of the policy to be met.  |   |
| <b>2.4</b>   | <b>Housing 21: Head of Group Property Compliance<br/>Oldham PFI: Head of Oldham<br/>Kent PFI: Operations Manager</b>  |
| Are responsible for the operational delivery of the policy and ensuring that:  |   |
| <ul style="list-style-type: none"> <li>• Policy and procedures are regularly reviewed and are kept up to date.</li> <li>• Competent employees are employed to provide technical support on gas matters.</li> <li>• Our duty of care to our customers, employees and contractors is robust.</li> <li>• The organisation has employees assigned with responsibility for the day-to-day management of contracts to ensure contractors deliver safety related checks on time, including continuous external audit.</li> </ul>  |   |
| <b>2.5</b>   | <b>The National Health and Safety Manager</b>   |
| Is responsible for:  |   |
| <ul style="list-style-type: none"> <li>• Ensuring policies and procedures are written and remain up to date.</li> <li>• Ensuring staff awareness and training in relation to gas safety is provided within the organisation.</li> <li>• Ensuring legislative changes and advice relating to changes are communicated to the Executive Team and ultimately the Board.</li> </ul>  |   |
| <b>2.6</b>   | <b>Housing 21: National Property Compliance Manager and Contracts Manager(s)<br/>Oldham PFI: Property Services Manager<br/>Kent PFI: Operations Manager</b> |

Are responsible for:

- Procuring competent gas safe contractors, capable of completing gas safety testing and auditing (Kent PFI service contractors form part of PFI framework).
- Organising, managing, and monitoring the maintenance and servicing contracts which include the service programme.
- Dealing with contractor related complaints and escalations where necessary.
- Contacting the Technical Services Team to review any complex gas remedials to consider whether these need to form a SIP project and informing the scheme surveyor of these works if needed.
- Updating programmes to include/remove any additional properties following any new builds, acquisitions, major sip works or disposals.
- Arranging for sample audits to take place to seek independent assurance on the quality of our contractor testing performance.

**2.7 Housing 21: Head of Technical Services and Technical Services Manager**  
**Oldham PFI: Property Services Managers/ Head of Technical Services and Technical Services Manager**  
**Kent PFI: Head of Technical Services and Technical Services Manager**

Are responsible for:

- Providing technical expertise to the business in relation to gas safety, to include advising the business of changes in legislation and regulations.
- Reviewing any complex remedials to ascertain the need, urgency and determine how we should proceed in order to address the remedial/s.
- Reviewing external audit recommendations in relation to gas safety and ensuring these are actioned as appropriate.

**2.8 Housing 21: Building Surveyors, in conjunction with the Technical Services Team**  
**Oldham PFI: Property Services Manager**  
**Kent PFI: Housing 21 Building Surveyor, in conjunction with Housing 21's Technical Services Team**

Are responsible for:

- The co-ordination and management of all major remedial works that would fall under a stock investment project, such as a replacement plant room.
- Informing the Property Compliance team of changes to assets where these result in a servicing implication and providing the Property Compliance Team with any new documentation relating to the works.

**2.9 Housing 21: Scheme Managers**  
**Oldham PFI: Neighbourhood Services Managers**  
**Kent PFI: Scheme Managers**

Are responsible for:

- When testing dates are provided, managing contractor's access to ensure that all testing can be completed on time.
- Supporting resident liaison, including managing issues relating to access, resident damage, and improvements to gas systems, facilitating the 'No access' process, and where necessary, the legal process to gain access if no access is granted.
- Providing residents with a copy of their LGSR within 28 days of issue
- Providing a copy of the LGSR to a new tenant before they occupy the property.
- Arranging for remedials and repairs to be completed in line with the devolved repairs model, utilising the schemes commercial gas contractor for any commercial repairs.

- Reporting contractor escalations and concerns to the Property Compliance team.
- Completing void inspections and arranging for contractor to cap the property if the property is to be void for over 30 days
- Checking and recording smoke alarms and carbon monoxide alarms are working on the day the tenancy begins

## 2.10 Training

Housing 21 will provide appropriate training for relevant persons to ensure they fulfil the management and compliance requirements related to their role. This training will be available on the Housing 21 learning platform Fred.

Housing 21 catering employees who use the gas catering equipment should be trained in its proper use and how to carry out visual checks for obvious faults.

## 2.7 Contractors

Contractors are responsible for carrying out required safety inspections, servicing, maintenance and repairs as determined by the Contract and in accordance with the Contractors Code of Conduct, which is agreed and signed at the commencement of the contract.

All contractors will be DBS vetted. Due diligence checks will be undertaken to ensure contractors are Gas Safe registered, competent to undertake works with domestic, commercial, natural gas or LPG installations and equipment as appropriate and have an appropriate accreditation such as CHAS, Safe Contractor or equivalent that is recognised by Housing 21.

## CONTRACTOR PERFORMANCE

Contractor Performance will be reviewed/audited, and compliance monitored regularly to ensure that the programme of service and inspection continues to comply with this Policy.

Housing 21 will carry out a sample audit of contractor servicing competence using an external consultant. These findings are reviewed by the Head of Technical Services and reported to the Safety Forum.

If employees have concerns, or a resident has raised a concern, regarding contractor performance employees should utilise the '[Property Compliance Escalation Form](#)', located on the intranet or contact the Property Compliance team directly to discuss their concerns. These concerns will be reviewed by the Contracts Managers who will raise issues at either future contract management meetings or immediately with the contractor, depending on the severity of the concern. Once resolved, the Contracts Manager will provide feedback to the individual who raised the initial concern.

## **CONSULTATION**

Housing 21's Health and Safety Forum and Policy Steering Group have been consulted about the development of this Policy.

Specific input of technical advice has been sought from Housing 21 employees with operational knowledge of gas safety management.

Housing 21's Primary Authority, South Cambridgeshire District Council, Environmental Health have been consulted on the development of this policy.

## **ASSOCIATED DOCUMENTS AND GUIDANCE**

Gas Safety Management Procedures Document