

GAS AND HEATING SAFETY POLICY

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Executive Summary:
<p>This policy sets out our legal and regulatory duties in respect of gas and heating safety and what we will do to ensure we comply with them. The policy includes details of the safety inspection / check programmes we will operate to achieve this, and the measures we will take to ensure the programmes are delivered safely and in a timely manner. It also sets out how we will monitor delivery of the policy and of the programmes.</p>

Policy Grouping/Directorate	Property Compliance / Property Services	
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1 Introduction and Aims

- 1.1 As a landlord, RBH is responsible for the maintenance and repairs to our homes, communal blocks and other properties we own and manage, many of which will contain gas installations and appliances. The Gas Safety (Installation and Use) Regulations 1998 (as amended) specifically sets out requirements around the installation, maintenance and use of gas appliances, fittings and flues in domestic properties and certain commercial premises to ensure they are and remain safe.
- 1.2 We are also responsible for maintaining other types of heating systems to ensure that all heating appliances provided for customers are safe. These are solid fuel and electrical heating systems.
- 1.3 The key objective of this policy is to ensure our Senior and Executive Leadership Teams, colleagues, partners and customers are clear on our legal and regulatory gas and heating safety obligations and what we will do to comply with them. This policy provides the framework our colleagues and partners will operate within to meet these obligations.
- 1.4 The aims of the policy are:
 - To ensure that RBH has identified and complied with all relevant legal duties in respect of gas and electrical heating safety.
 - To ensure that RBH is meeting our regulatory duties in respect of gas and electrical heating safety.
 - To help deliver our objectives within our Corporate Strategy to ensure our customers live in safe homes and that we are delivering customer focused services which meet their needs.
- 1.5 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst colleagues and contractors and it will be shared with all relevant RBH colleagues and partners.

2 Context

- 2.1 The Gas Safety Regulations impose duties on landlords to protect tenants in their homes. The main landlord duties are set out in Regulation 36 and require 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 two years (until at least two further gas safety checks have been carried out).
 - Issue a copy of the latest safety check record to existing tenants within 28 days of the check being completed, or prior to any new resident moving 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.

- Ensure that no gas fitting of a type that would contravene Regulation 30 (for example, 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.

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

- 2.2 There are no specific legal duties to carry out checks on other types of heating, but it is good practice to undertake periodic checks of solid fuel heating systems and electrical heating systems.
- 2.3 The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 require social landlords to:
- Install a smoke alarm on every storey with living accommodation.
 - Install carbon monoxide alarms in any rooms used as living accommodation with a fixed combustion appliance (excluding gas cookers).
 - Repair or replace faulty alarms as soon as reasonably practicable.

- 2.4 This policy will support RBH to comply with the following regulatory standard:

Consumer Standards – Safety and Quality Standard

The delivery of this policy will support us to comply with the requirement to take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas. This policy has identified the legal requirements that relate to gas and heating system safety, and sets out what we will do to comply with them.

3 Values

- 3.1 The policy fits with all the mutual values of RBH:

Putting People First: We listen with empathy, respond with compassion, and make it easy for our customers to access our services.

Doing What We Say: We earn trust through honesty, integrity, caring and keeping our promises.

Working As One: We embrace our mutuality and work together to deliver great outcomes for the people living in our homes and communities.

Delivering Quality: We invest wisely in our people and make it easy for them to deliver services and create places that our customers are proud to call home.

Open & Transparent: We are curious, embrace diverse ways of thinking and seek feedback to help us improve.

4 Policy Statement

- 4.1 We acknowledge and accept our responsibilities under the Gas Safety Regulations and the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 as outlined in Section 2, and all other duties set out in relevant legislation.

- 4.2 We will maintain a core asset register of all properties we own and/or manage, with component/attribute data against each property to show gas/heating safety check requirements.
- 4.3 We will operate a robust process to manage all changes to our assets, including property acquisitions and disposals, to ensure that properties are not omitted from gas/heating safety programmes and the programme remains up to date.

Gas/heating safety programme

- 4.4 We will carry out an annual gas safety check to all properties with a gas supply, irrespective of whether the gas is connected or not. The check will be completed within 12 months from the date of the previous check.
- 4.5 We will ensure that copies of all landlord's gas safety records (LGSRs) and any other relevant certificates are provided to customers or displayed in a common area within 28 days of completion of the safety check.
- 4.6 We will install/test and replace (as required) battery operated and/or hard-wired smoke alarms and carbon monoxide alarms as part of the annual gas safety check visit (and when the property is void). Where the property does not have a gas supply, we will still undertake an annual check of the smoke and carbon monoxide alarms.
- 4.7 When a property becomes void and a new customer is not moving in immediately after, we will cap off the gas supply. This will be completed by the end of the next working day following the property becoming void.
- 4.8 We will cap off gas supplies to all newly acquired properties (whether new build properties upon handover from the contractor or upon completion of a purchase) if the new tenancy is not commencing immediately at the point of handover.
- 4.9 We will take steps to ensure that gas safety checks are carried out within 24 hours of the commencement of a new tenancy, mutual exchange and/or transfer, subject to the customer's availability. Where this does not meet the customer's needs, we will maintain contact until this is arranged and completed. We will ensure the resident receives a copy of the current LGSR for the property when they commence their tenancy, and then issue the LGSR for the new check when they move in, as per paragraph 4.5.
- 4.10 We will ensure a gas safety check is carried out following our installation of any new gas appliance and ensure we have a gas safety certificate which confirms the necessary checks have been completed. The safety check will include: a gas soundness test of the carcass; gas working pressures being taken; a visual inspection of the meter installation; and a visual inspection, including the safe working operation, of all other gas appliances and associated flues within a property.
- 4.11 We will carry out a five-point visual check of customer-owned appliances in properties where we are responsible for carrying out a gas safety check. The visual safety check (location; flueing; ventilation; signs of distress; and stable and secure) will be done on gas cookers and gas fires. Where appliances are found to be faulty these will be disconnected and a warning notice issued. We will require the customer to provide a copy of an appropriate record from a Gas Safe engineer that the appliance has been made safe.

- 4.12 A gas 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.
- 4.13 We will carry out an annual gas safety check to all RBH properties where the gas supply has been capped (either by RBH and/or at the request of the customer), and will check that the supply has not been reconnected by the customer. At the same time, we will check on the customer's wellbeing and assess whether or not the lack of gas heating is adversely affecting the condition of the property, and take appropriate steps to signpost the customer to financial and other support services (including our tenancy sustainment services) and to ensure the property is safe. In addition, we will communicate periodically with these customers to check whether the property remains capped and inform the customer of what is required to reinstate gas at the property.
- 4.14 If a customer requests we cap off the gas supply to their property, we will not do so unless there are extenuating circumstances which mean the customer or others would be at greater risk if we left the supply live. In all circumstances where a customer makes a request for their supply to be capped, or where it has already been capped, we will refer them to our tenancy support and other relevant services for advice and support to maximise their income and keep their home heated.
- 4.15 Any open flue gas appliances found in any rooms that are being used as bedrooms or for sleeping will be removed.
- 4.16 We will carry out a safety check of electrical heating systems every five years, as part of the periodic electrical inspection and testing programme.
- 4.17 Where we have installed a solid fuel appliance, or have given permission for the resident to install a solid fuel appliance, we will carry out an annual safety check a chimney sweep at least twice a year when burning wood or house coal. As individual solid fuel heating systems become beyond economic repair, we will replace them with alternative heating.
- 4.18 We will not permit customers to install their own fixed heating appliance (such as wood burning heaters). Where we find such heating systems have been installed without permission, we will require their removal. Where we have previously given permission for a resident to install a fixed heating system, we will assume responsibility for the regular safety checks and servicing (including chimney sweeps) unless agreed otherwise with the customer.
- 4.19 We will install, test and replace (as required) battery operated and/or hard-wired smoke alarms and carbon monoxide detectors as part of the annual gas safety check (or when the property is void).
- 4.20 We will operate a robust process for the management of immediately dangerous situations identified from the gas/heating safety check and in any other circumstances. This will include the disconnection / isolation of the appliance or supply if required.
- 4.21 We will operate a robust process if there is difficulty gaining access to a property to carry out the gas/heating safety check or any required remediation works. We will use the legal remedies available within the terms of the tenancy agreement, lease or license following a minimum of three attempts at gaining access. We will also work with other statutory agencies to support our attempts to gain access. Where customer

vulnerability issues are known or identified, we will take steps to ensure we safeguard the wellbeing of the customer.

- 4.22 We 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 (where the work cannot be completed at the time of the check).
- 4.23 We will operate effective contract management arrangements with any contractors who support the delivery of the safety check programme and who carry out work on gas appliances and installations in our homes. This will include ensuring contracts/service level agreements are in place, conducting client-led performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 4.24 We will ensure that all replacements, modifications and installations of gas appliances and heating systems within our properties will comply with all elements of Building Regulations, Part J Combustion Appliances and Fuel Storage Systems, and we will update our management information systems and records accordingly.
- 4.25 **Communal blocks and other properties** – We will carry out a programme of annual gas safety checks and services to all communal blocks and other properties where we have the legal obligation to do so; these will be completed within 12 months from the date of the previous safety check.
- 4.26 **Properties managed by others** – Where our properties are managed by others and we do not have the repairing obligation, we will require them to provide copies of valid and in date LGSRs/gas safety certificates to us. If the third party does not provide the LGSR/certificate, we will carry out the safety check and re-charge them for the cost of this work.
- 4.27 **Leasehold properties** – We will remind leaseholders of their obligations to keep their electrical installation in good repair and to carry out regular checks, and will provide advice about how they can do this. We will risk operate a risk-based approach to electrical safety in leasehold properties, and will request evidence that the electrical installation is safe in our high risk buildings and in any other buildings or from customers which we identify as being higher risk. If the leaseholder does not provide this evidence upon request, we will determine the appropriate action to address this which may include carry out the safety inspection and re-charge them for the cost of this work.

Managing risk

- 4.28 We will establish and maintain a risk assessment for gas safety management and operations, setting out our key gas safety risks and appropriate mitigations.
- 4.29 We will operate a process for identifying and managing customers who are at risk and support our attempts to gain access, including mitigation plans to manage any specific risks identified.
- 4.30 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) a Construction Phase Plan will be in place in respect of all repairs to void and tenanted properties (at the start of the contract and reviewed/updated annually thereafter), component replacement works and refurbishment projects.

- 4.31 We will carry out a risk assessment under the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002 to any buildings which require them.
- 4.32 We will operate a robust process to investigate and manage any **RIDDOR notifications** submitted to the HSE in relation to gas and heating safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.
- 4.33 We will operate a robust process for **dealing with and escalating any significant non-compliance**. Our definition of significant non-compliance is: any incident which has the potential to result in a material breach of legislation or regulatory standard, or which causes a risk to health or safety.
- All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of an RBH employee becoming aware of it.
 - Any non-compliance issue identified at an operational level will be formally reported to either the relevant Service Manager or Head of Service in the first instance, who will agree an appropriate course of corrective action with the Director of Property Services. The Director of Property Services will report details of the same to the Executive Leadership Team.
 - In cases of serious non-compliance, the Executive Leadership Team will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive. In such instances, the issue will also be reported to Board.

The issue will also be recorded and investigated in accordance with the RBH accident and near miss reporting process.

Training and competency

- 4.34 We will ensure that suitably competent and trained people will carry out safety checks and undertake work on gas and heating systems:
- Only suitably competent Gas Safe accredited engineers and contractors, with up to date accreditations, will undertake works to RBH gas fittings, appliances and flues.
 - All operatives/engineers (employed by RBH or externally employed by a contractor) will maintain Gas Safe accreditation for all areas of gas works that they undertake for or on behalf of RBH.
 - Only suitably competent Oil Firing Technical Association (OFTEC) and/or HETAS accredited contractors will undertake works to solid fuel fittings, appliances, and flues.
 - Only suitably competent NICEIC (or equivalent) electrical contractors and operatives will undertake servicing and repairs to electrical heating systems.
 - Only suitably competent Gas Safe registered and NICEIC (or equivalent) third party technical auditors will undertake quality assurance checks.
- 4.35 We will check our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor's certification appropriately.
- 4.36 We will deliver training on this policy and the procedures that support it, through appropriate methods including: team briefings; basic gas and heating safety

awareness training; and on the job training for those delivering the programme of gas and heating safety checks, planned maintenance and repair works as part of their daily job. All training undertaken by RBH colleagues will be formally recorded.

Customer communications

- 4.37 We consider good communication essential in the effective delivery of gas/heating safety programmes, therefore we will establish a customer engagement strategy and communication programme to support customers in their understanding of gas/heating safety. This will include writing and/or texting them in advance of safety checks, taking account of any specific customer communication requirements. This will assist us in maximising access to carry out safety checks, encourage and support customers to report any concerns about gas/heating safety, and help us to engage with vulnerable and hard to reach customers. We will share information clearly and transparently and will ensure that information is available to customers via regular publications and information on our website via regular publications and information on our website via regular publications and information on our website. We will tailor our communications to meet any known needs of our customers.

5 Monitoring

- 5.1 We will hold gas/heating safety check dates and safety check records against each property we own or manage.
- 5.2 We 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.
- 5.3 We will ensure there is a programme of third-party quality assurance audits of gas safety checks. This will cover new installations (or those which have had upgrades which require a new LGSR), sample of field checks and gas safety certificates. Sampling will be risk-based, taking into account the property type and the engineer who carried out the inspection. The minimum sample size will be 5%.
- 5.4 Internally we will undertake 100 per cent desktop audits of all LGSRs/certificates.
- 5.5 We will keep all completed safety check records, warning notices and remedial work records for at least two years, and in accordance with our document retention policy and will have robust processes and controls in place to maintain appropriate levels of security for all gas/heating safety related data and records.
- 5.6 We will hold data and monitor performance against the following:
- Data – the total number of:
- Properties – split by category (domestic, communal and others);
 - Properties on the gas/heating servicing programme;
 - Properties not on the gas/heating servicing programme;
 - Properties with a valid and in date LGSR/certificate;
 - Properties without a valid and in date LGSR/certificate;
 - Properties due to be serviced within the next 30 days; and
 - Completed, in-time and overdue follow-up works/actions arising from the programme.

Narrative - an explanation of the:

- Current position;
- Corrective action required;
- Anticipated impact of corrective actions; and
- Progress with completion of follow-up works.

- 5.7 We will also monitor the number of RIDDOR notifications to the HSE about gas/heating safety and the actions take, through our Health and Safety Committee and report on this to Board.
- 5.8 We will report key performance indicator (KPI) data for gas safety to our Executive Leadership Team (ELT) on a monthly basis, and to the Customer Service Committee on a quarterly basis. We will also report any non-compliance to Board on an exception basis, in accordance with our performance monitoring and KPI framework. We will report our performance to customers in our annual report, and through our website and other communication channels throughout the year.
- 5.9 We will carry out an internal or independent audit of gas/heating safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

6 Review

- 6.1 All RBH strategies, policies, service standards and procedures are reviewed on a regular basis to ensure that they are 'fit for purpose' and comply with all relevant legislation and statutory regulations.
- 6.2 This policy will go through the full policy approval process every 3 years and will undergo a desktop review annually. This is to ensure that it is fit for purpose and complies with all relevant and statutory regulations.

7 Links with Other RBH Documents

- 7.1 This policy links to the following policies and strategies:
- Homes and Communities Strategy
 - Electrical Safety Policy
 - Fire Safety Policy
 - Asbestos Safety Policy
 - Construction Design and Management (CDM) Policy
 - Disrepair Policy
 - Responsive Repairs Policy

8 Inclusivity statement

- 8.1 We are dedicated to fostering an inclusive and equitable environment for all. We ensure that everyone is valued and respected. Our policies aim to be inclusive, and will comply with UK laws, including the Equality Act 2010, to create a diverse and supportive environment for people to thrive.

- 8.2 We understand not everyone absorbs information the same way. If you have any difficulty understanding or interpreting this document please email people@rbh.org.uk or call Freephone 0800 027 7769. We will work with you to ensure your individual needs are met.