

### Gas Safety, Space and Water Heating Policy

#### 1.0 Introduction

- 1.1 The Wrekin Housing Group (the 'Group') is a Community Benefit Society registered with the Financial Conduct Authority under the Co-operative & Community Benefit Society Act 2014. Our main business is the provision of social housing, care and support, adding social value to the lives of the people who receive our services and live in our communities.
- 1.2 The Group is committed to ensuring that residents' homes, offices, and commercial premises are safe and secure places to live and work. The Gas Safety, Space and Water Heating Policy documents how we will achieve our objectives of keeping people safe and ensuring that Gas services and all heating and hot water installations and equipment are appropriately managed, to ensure that we meet our legal obligations as a landlord, care provider and employer.

#### 2.0 Policy Statement

- 2.1 As the Duty Holder, the Group accepts its legal obligations under the Health and Safety at Work Act 1974, the Gas Safety (Installation and Use) Regulations 1998 (GSIUR), and the Housing Act 2004 for Gas safety services and maintenance, as well as all other types of heating and hot water installations and equipment, including Oil, Solid Fuel, electric, and renewable technologies.
- 2.2 The Wrekin Housing Group will:
- 2.2.1 Identify, make and keep an up-to-date record of all locations where gas, heating/hot water (HHW) systems or equipment is installed, owned or managed by the organisation.
  - 2.2.2 Assess the risk of the gas and HHW systems and equipment and implement programmes of work to ensure all are maintained on an ongoing basis.
  - 2.2.3 Routinely inspect, test, maintain and repair the gas and HHW installations and equipment to ensure they remain safe for continued use. This includes pipework, wiring and other associated components within its properties (owned, leased, managed etc.), appliances, fixed equipment, cooking and catering equipment and plant.
  - 2.2.4 Respond immediately to gas leaks, suspected fumes, and CO alarm activations; ensure the risk is isolated, investigated, and corrected; report incidents under RIDDOR where required by law; and fully cooperate with any formal investigation.
  - 2.2.5 Undertake a gas and oil safety inspection and services of appliances at a maximum of every 12 months on every gas installation. For

commercial gas installations, this will be carried out at a maximum of every 6 months.

- 2.2.6 Undertake a Fill Fire and Test (safety inspection) on all gas/oil installations before a new tenancy (void or mutual exchange) begins to verify that the installation and appliance are safe to use and will continue to be throughout occupation.
- 2.2.7 Provide a copy of the most recent gas safety check record to tenants within 28 days of completion of the inspection or to any new tenant when they move in. This will be done electronically access via the tenant's app or by posting out a hard copy.
- 2.2.8 Display a copy of the most recent safety check record in a building common area where the Gas appliance serves a communal heating system for multiple homes.
- 2.2.9 For all void properties, carry out a gas cap off to isolate gas supply at the meter while the property is unoccupied, as well as the removal of fuel-burning appliances not owned by the Group
- 2.2.10 For all mutual exchanges, carry out a gas cap off to isolate gas supply at the meter on the day of the exchange and reinstate the supply, performing the necessary safety check for the new tenant on the same day, including the visual inspection of any retained appliances not owned by the Group.
- 2.2.11 All gas work shall only be carried out by engineers registered with the Gas Safe Register and only specific works category for which they are trained and competent to do so. Keep an updated record of all engineer's (both in-house and all contractors) training and work categories.
- 2.2.12 Engineers have duty to comply with the industry standards, best practice, work within scope of qualifications, following training and instructions.
- 2.2.13 Ensure a robust process is in place for the management of any follow-up works required to gas, heating/hot water (HHW) systems, appliances or equipment.
- 2.2.14 Following strictly the GEM/G/11 Edition 2 with amendments - Gas industry unsafe situations procedure, where an unsafe or potentially unsafe situation is identified.
- 2.2.15 For all other forms of fuel types, follow the industry standards and best practice guidance in their installation use and maintenance;
  - The Oil Firing Technical Association (OFTEC);
  - Biomass and solid fuel heating HETAS;
  - Microgeneration Certification Scheme (MCS) for renewable technologies.

- 2.2.16 Where the inspection and testing of installations, appliances and equipment identifies defects that may pose a risk, the equipment will be immediately taken out of service, isolated, and adequately labelled. If the equipment is to be put back into service, this will only happen where required repairs are undertaken and the outcome of a subsequent inspection and test is satisfactory. The installations, appliances and equipment must be confirmed as being safe for continued use.
- 2.2.17 Obtain ongoing work records to evidence the maintenance of installations, appliances and equipment. The Group will ensure that accurate records are held for each - including actions identified, timescales are set and action plans are put in place to ensure such works are completed.
- 2.2.18 Ensure that those undertaking such activities, including managing the process, are adequately trained and competent.
- 2.2.19 Ensure that staff, contractors and consultants appointed to undertake auditing, inspections, testing, installation, repair and maintenance-related works shall have the practical skills, training /qualifications, experience, knowledge, and behaviours to ensure the installation is safe to use condition.
- 2.2.20 Prepare, review and update a Heating Procedure Manual that describes how the organisation will manage the safety of its gas installations and equipment.
- 2.2.21 Take the necessary steps needed to put the Procedures Manual into action.
- 2.2.22 Put in place an Access Procedure that will be adhered to at all times to ensure that anniversary dates are satisfied and appropriate legal action can be undertaken where required.
- 2.2.23 Ensure that those who control access to the organisation's homes or buildings have co-operated in managing the gas and HHW installations equipment etc, including leaseholders, 3rd party landlords and managing agents.
- 2.2.24 Ensure that all equipment required to undertake works, inspection and testing works are adequate and maintained to ensure their correct function and reliability.
- 2.2.25 Ensure that suitable and sufficient risk assessments, method statements and safe systems of work are in place for all work and other work activities, including the use of equipment or appliances.
- 2.2.26 Ensure that the procurement and appointment of contractors, consultants and direct labour organisations (DLO) include assessment criteria to evaluate their competency and performance as part of a quality-based evaluation. This evaluation will be sufficiently weighted to

ensure the best value option in the selection process. Best value will be continually monitored throughout the delivery of the works/service by implementing Key Performance Indicators (KPIs).

- 2.2.27 Ensure that any property acquisitions, including new construction development properties, are included in the cyclical safety inspection and servicing programmes, with current valid reports/certification on file at the time of acquisition. Particular consideration will be given to "buy back, mortgage rescue, or share ownership reversal" where an existing occupant remains and enters into a lease with the Group as a Landlord (as defined by regulation 36 GSIUR) where the condition and maintenance history of the appliance and installation is limited or unknown.
  - 2.2.28 Maintain property databases and works information to assure the Group Board and all key stakeholders that Gas and HHW safety is effectively managed.
  - 2.2.29 Undertake a continuous improvement process, independent assurance and scrutiny for Gas and HHW safety management. This will be achieved through internal and external auditing of works, documentation, and implementing actions and recommendations highlighted as part of these audits.
  - 2.2.30 Utilise independent third parties to conduct quality assurance audits of gas works, applied across all work streams, including post-completion and work-in-progress audits and desktop reviews. Findings will be reviewed, necessary action taken and relevant measures implemented to improve the quality of work.
  - 2.2.31 Provide advice to customers regarding Gas and HHW safety, including risks associated with carbon monoxide, through leaflets, user, heat/smoke/ CO alarms instructions and information on the Group's website, as well as providing copies of Landlord Gas Safety Records should be included.
  - 2.2.32 Ensure that any building refurbishment or alteration work that could impede gas safety is prohibited. Where building works impacting (or has the potential to impact) gas appliances is required (e.g. external work on appliance flues), pre and post-gas safety checks are performed to ensure that gas safety is not compromised.
- 2.3 To ensure compliance with legislation and this policy, performance reporting will be provided to the Executive Management Group (EMG) and the Audit and Assurance Committee as detailed within section 7.
- 2.4 The Group acknowledges that failure to meet the requirements set out within the Health and Safety at Work Act 1974 and Gas Safety (Installation and Use) Regulations 1998 (GSIUR), could lead to prosecution by the Health and Safety Executive (HSE), prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007, a serious detriment judgement from the Regulator of Social

Housing (RSH) and enforcement under the Housing Act 2004 by the local authority.

### 3.0 Policy Scope

- 3.1 This policy applies to all staff, tenants, service users, visitors, contractors, third-party providers and other people affected by the acts and omissions of the Group concerning Gas and HHW safety management.
- 3.2 This policy applies to all domestic and non-domestic premises (or parts), within the scope of the Gas Safety (Installation and Use) Regulations 1998, and other relevant legislation relate to HHW installations and equipment owned or managed by the Group.
- 3.3 The Group must ensure it complies with the Regulator of Social Housing's (RSH) regulatory framework and consumer standards for social housing in England. The Home Standard is the primary one applicable to this policy.

### 4.0 Definitions

- **Cap off** – isolation of the gas supply to the property at the meter by removing the connection pipework to the installation pipework and putting in place a blank cap, the process of which includes performing a tightness test and recoding information on works sheet documentation.
- **Gas Safe Register** - is the official gas registration body for the United Kingdom, Isle of Man and Guernsey, appointed by the relevant Health and Safety Authority for each area. By law all gas engineers must be on the Gas Safe Register.
- **Work categories** - Found on the back of your Gas Safe registered engineer's Gas Safe card, these categories confirm an engineer's qualification to carry out a specific type of gas work on a certain appliance.

### 5.0 Roles and Responsibilities

- 5.1 The **Wrekin Housing Group Board** and **Group Chief Executive** have overall governance responsibility for implementing the policy, its effectiveness and compliance with statutory requirements. The Group Board will:
  - Through the **Audit & Assurance Committee**, have oversight and scrutinise Gas and HHW safety management performance reporting information and Gas and HHW safety management arrangements. This includes ensuring that there are suitable risk control measures in place;
  - Ensure sufficient funds and other resources are provided for establishing, implementing and continually improving Gas and HHW safety across the Group.

5.2 The **Executive Directors** and **Senior Managers** will oversee the implementation of this policy and will monitor and review its effectiveness by:

- Ensuring that this policy is applied consistently across the Group;
- Ensuring that sufficient resources are available to meet the requirements of preventative, protective and control measures;
- Ensuring that current Gas and HHW safety legislation and associated regulatory guidance are complied with;
- Ensuring the appointment of a Duty Holder as prescribed by the Gas Safety (Installation and Use) Regulations 1998 (GSIUR), and ensure the duty holder maintains an adequate system of monitoring gas and HHW safety performance, identify any failure/ non-compliance and take appropriate remedial action, ensure information is provided for reporting to the Board and Executive Management Group.
- Ensuring suitable reporting mechanisms are in place to monitor the Gas and HHW risk of the organisation and reporting at Executive Management and Board levels;
- Ensuring that a positive culture surrounds the management of, and compliance with, Gas and HHW safety management prevention and protective measures. This includes in the workplace and to customers by delivering communications to employees that positively promote Gas and HHW safety;
- Being responsible for the effective management, monitoring and progression of safety issues within their service area;
- Ensuring that effective management systems are in place to achieve high standards of Gas and HHW safety management;
- Ensuring a regular review of the Gas and HHW safety management structure with delegated organisational responsibilities for implementing this policy and local Gas and HHW safety management arrangements.

5.3 The **Director of Care and Support** is the responsible person for CQC prosecutions for failing to provide care and treatment in a safe way (including incidents relating to Gas and HHW safety).

5.4 The **Resident Safety Manager** is appointed by Executive Directors and Senior Managers to carry out the function of Duty Holder as prescribed by GSIUR. They are responsible for monitoring adherence to this Policy and in particular for:

- Developing and reviewing the Gas Safety, Space and Water Heating Policy and the procedures documents for the Group;
- Preparing reporting and performance monitoring information, including non-compliance related to Gas and HHW safety;
- Ensuring competent persons are appointed to assist in undertaking the Management of Gas and HHW safety management;
- Monitoring best practices and innovation to ensure that Gas and HHW safety management arrangements remain current and up to date with developing technical standards;
- Ensuring systems and processes are set up to manage Gas and HHW installations, equipment, appliance, and works across the Group;

- Ensuring that employees who are responsible for gas and HHW works receive adequate information, instruction, supervision and training. Taking particular regard to new or inexperienced employees to prevent risk of harm as a result of work and provide adequate supervision with regards to the nature of the work involved;
- Appropriately monitoring the work of the Managed Service Team, who is operationally responsible for delivering the requirements of the policy in line with the documented procedures;
- To be the Duty Holder for the Group as part of the registration with Gas Safe, accreditation system body for carrying out gas work;
- To be responsible for maintaining the overall standard and quality of the Gas and HHW works undertaken, including ensuring that employees are competent to carry out the range of work required of them;
- Ensuring that all contractors appointed to carry out gas work are accredited through Gas Safe or with a self-certification scheme (OFTEC, HETAS or equivalent) at the appropriate level for intended work;
- Maintaining accreditation with Gas Safe or a self-certification scheme (or equivalent OFTEC, HETAS or equivalent) at the appropriate level for intended work carried out by directly employed heating engineers, undertake the duties of “Duty holder”, required by Gas Safe and appoint a Qualified Supervisor to carry out supervision of such work, as well as assess certification and reports produced.

5.5 **Delegated Organisational Responsibilities** - responsibility for delivering the policy and procedure objectives is delegated to roles throughout the Group’s management structure. These roles and their responsibilities are detailed within the Heating Procedure Manual.

## 6.0 Statutory Duties

6.1 The policy ensures compliance with the Regulatory Framework and Consumer Standards (Home Standard) for Social Housing in England and The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

6.2 The principle legislation applicable to this policy is the following:

- Gas Safety (Installation and Use) Regulations 1998 (GSIUR) as amended;
- Housing Health and Safety Rating System introduced under Part 1 of the Housing Act 2004.

6.3 The principle approved Codes of Practice and guidance applicable to this policy are:

- GEM/G/11 Edition 2 with amendments - Gas industry unsafe situations procedure;
- HETAS Guidance (Solid Fuel Systems);
- Oil Firing Technical Association (OFTEC) Guidance;
- Approved Document L, Conservation of fuel and power (vol 1 & 2);
- Heating equipment specific manufacturer’s instructions;

- The Pressure Systems Safety Regulations 2000 (PSSR).

6.4 The Gas Safety, Space and Water Heating Policy also operates in the context of the following additional legislation:

- Health and Safety at Work Act 1974;
- The Management of Health and Safety at Work Regulations 1999;
- The Workplace (Health Safety & Welfare) Regulations 1992;
- Regulatory Reform (Fire Safety) Order 2005;
- The Building Regulations 2010;
- Provision and Use of Work Equipment Regulations 1998 (PUWER);
- Consumer Protection Act 1987;
- The Occupiers' Liability Act 1957 and Occupiers' Liability Act 1984;
- Personal Protective Equipment at Work Regulations 2022;
- Hazardous Waste (England & Wales) Regulations 2005 (as Amended);
- Control of Substances Hazardous to Health (COSHH) Regulations (as amended) 2002;
- Construction, Design and Management Regulations 2015;
- Defective Premises Act 1972;
- Landlord and Tenant Act 1985;
- Data Protection Act 2018;
- RIDDOR - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Gas Safety (Management) Regulations 1996
- BS 7671: (as amended) Requirements for Electrical Installations
- Other Legislative, Normative (gas Standards) and Informative reference documents documented by Gas Safe within the Legislative, Normative & Informative Document List (as amended).

## 7.0 Monitoring

7.1 Compliance with the Gas Safety, Space and Water Heating policy will be achieved by delivering its objectives by the operational and management teams. The effectiveness and performance of the policy will be monitored through regular reporting to the Group Board and the Executive Management Group (EMG).

7.2 Reporting to the Audit and Assurance Committee – Quarterly:

<b>Gas Heating - Locations (exc voids) / Solid Fuel Heating - Locations (exc voids) / Oil Heating - Locations (exc voids) / Heat Pump/Solar/Elec Heating - Locs (exc voids)</b>
<ul style="list-style-type: none"> <li>• A Total number of locations requiring Service/ safety inspection for all buildings owned or managed by the Group.</li> <li>• The number (and percentage) of properties with a valid 'in date' Service/ safety inspection</li> <li>• Commentary on all overdue Service/ safety inspection and action being taken to address non-compliance</li> </ul>
<ul style="list-style-type: none"> <li>• The number of notices of deficiencies, improvement notices, and RIDDORs issued in the period.</li> </ul>



- High-risk hazards and non-compliances identified from procedures that require Board approval to action.
- Results of Audits and approval of action plans.
- Updates and commentary on audit action plans.
- Policy reviews and approval.

7.3 Reporting to EMG – monthly: information report to the Audit & Assurance Committee plus:

**Gas Heating - Locations (exc voids) / Solid Fuel Heating - Locations (exc voids) / Oil Heating - Locations (exc voids) / Heat Pump/Solar/Elec Heating - Locs (exc voids)**

- Hazards identified from procedures that require EMG approval to action.
- Updates on industry changes to statutory and non-statutory requirements.
- Details of a technical audit carried out for work in progress post-inspection audits.
- Procedure changes and reviews.

## 8.0 Provision of the Policy

8.1 The Group's Heating Procedures manual (HPM) details the practices, procedures and wider delegated roles and responsibilities for achieving the objectives of this policy. The HPM is a separate suite of documents and is regularly reviewed to ensure that they reflect any operational changes within the Group. This is contained in the following file on the Group's shared internal ICT network:

**S:\Property Services\GAS\GAS TEAM APRIL 2011\Procedures Manual\Procedures**

<b>The Wrekin</b> Housing Group	<b>Policy control sheet</b> <b>Gas Safety, Space &amp; Water Heating Policy</b> <b>Policy reference number - 2023/014</b>
<b>Policy Author</b>	Nick Pike Resident Safety Manager
<b>Direct Lead</b>	David Hall Head of Property
<b>Version</b>	V2.0: May 2023
<b>Target audience</b>	All employees of The Wrekin Housing Group
<b>Consultation</b>	Senior Managers CORGI Technical Services Executive Management Group
<b>Date of Equality Impact Assessment</b>	An Equality Impact Assessment was completed in April 2022
<b>Date of Data Privacy Impact Assessment</b>	No personal data is processed as a result of the adoption of this policy
<b>Approving Body</b>	Executive Management Group
<b>Date of final approval</b>	May 2023
<b>Implementation date</b>	May 2023
<b>Monitoring arrangements</b>	Resident Safety Manager Health and Safety Team
<b>Reporting</b>	Executive Management Group – Monthly The Wrekin Housing Group Board - Quarterly
<b>Review date</b>	November 2024
<b>Expiry date</b>	May 2025
<b>Review cycle</b>	Three-Year Review Cycle
<b>Policy category</b>	Health and Safety
<b>Associated policies and procedures</b>	Heating Procedure Manual Resident Involvement Policy Complaints Procedures No Access Procedure Compensation Policy & Procedures Health and Safety Policy Customer Care Policy Value for Money Strategy
<b>Policy location</b>	Sharepoint

### Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Nick Pike	Policy reviewed in line with review cycle  Renamed from Space and Water Heating Policy	V2.0: XX 2023	Executive Management Group – XX 2023  Review Policy and Procedure at EMG in next 18-24 months