

Gas & Heating Safety Management Policy

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Equality Impact Assessment required	No
Data Protection compliant	Yes
Health and Safety compliant	Yes

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1. What this policy is about and why we need it

- Acis Group Limited (AGL) 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.
- The Gas Safety (Installation and Use) Regulations 1998 imposes a duty and legal obligation on AGL as a landlord and employer of gas engineers, this includes engineers employed directly and indirectly.
- 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
 - The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
 - The Building Safety Act 2022
 - The Fire Safety Act 2021
- Regulatory Standards - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Safety and Quality Standard) for social housing in England, which was introduced by Regulator of Social Housing (RSH) in April 2024.

2. Who does this policy apply to?

- This Policy applies to all persons employed to undertake activities on behalf of AGL, including contractors and other external agencies, 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 our 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.

3. Our Policy

3.1 Objectives

AGL 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 heating safety check carried out within 12 months of the previous safety check, commencing from the date the tenancy commenced or the date the installation was new.
- Ensure that copies of all LGSRs and other certification 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.

3.2 Scope

- The Gas and Heating Safety Management Policy applies to all properties owned and managed by AGL with the exception of leasehold properties where the duty holder is the leaseholder.
- 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
- AGL's statutory duties include the servicing and maintenance of:

Domestic residential properties

- Assisted living premises
- General needs multi occupancy residencies with common areas
- Student accommodation
- 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.
- The requirements of this policy are also applicable to all repairs / maintenance and planned works activities.

3.3 Responsibilities

The table below identifies key responsibilities

Role/ Responsibilities
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 the internal control environment is operating effectively. ○ Consider and approve strategies/policies and resource allocation as necessary to ensure that AGL maintains robust safety arrangements.
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 AGL's 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 AGL's 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
The Director of Property Services is responsible for the strategic and financial management of the delivery of services within the Property Services directorate. They are responsible for ensuring that effective compliance assurance systems are established and maintained. They will ○ Ensure adherence to this policy is maintained across the group ○ 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 Leadership Team (ELT) on at least a monthly basis
The Head of Property Development & Assets has delegated responsibility for providing strategic leadership, direction, and overview of AGL's gas and heating safety management policy and supporting arrangements. They are additionally responsible for leading development and regeneration activities, developing and

managing external relationships and business development, whilst ensuring compliance with regulatory requirements and corporate policy, and will:

- Maintain a broad awareness of current statutory requirements and principles of good practice for gas and heating safety management
- Consult with ELT and the wider Senior Management Team (SMT) 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 ELT on at least a monthly basis and to the Board on at least a quarterly basis.
- 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.

The **Head of Repairs Delivery** 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. They 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

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- The Building Safety Manager is responsible for ensuring that the technical, consultation and data recording requirements of the Building Safety Act are adequately discharged for all buildings in scope. They will:
 - Ensure adherence to this policy is maintained
 - Monitor statutory compliance
 - Audit systems, processes and documentation to ensure compliance against statutory requirements, corporate policy and procedural arrangements.

The **Property Compliance and Data Manager** is responsible for leading, directing and managing the compliance function and supporting the Head of Property Development & Assets to design and deliver policies and programmes to maintain robust property compliance across AGL's domestic and non-domestic property portfolios. They 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.
The Asset Compliance Surveyors, Acis Repairs Managers and Supervisors, and Neighbourhoods Area Service Managers are the operational team responsible for leading and supporting all 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. This Compliance Operations Team will work together to: ○ 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 Property Data and Compliance Manager. ○ Follow the manufacturer's installation instructions, industry best practice and AGL housing procedures when undertaking their work activities ○ Report to the Health and Safety Team and the Property Data and Compliance Manager any faults, hazards, unsafe practices, accidents, adverse incidents, dangerous occurrences and near misses whether injury is sustained or not.
The Acis repairs & Maintenance Manager is responsible for: ● The delivery of heating servicing and repairs ● The operational management of operatives and sub-contracted personnel ● Ensuring that any work undertaken internally or externally is delivered within the competency framework identified in the Heating Management Plan.
The Planning Manager is responsible for: ● Reviewing the Heating Protocol process map to ensure it is fit for purpose ● Co-ordinating access into properties to carry out servicing and repairs.
The Commercial Team are responsible for: ● The procurement of suitably qualified and competent contractors for relevant workstreams ● The management of the ordering process for all externally delivered works.
The Health and Safety Team fulfil the role of competent person 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, ELT, and Head of People Services 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 AGL and making regular reports

- Periodically monitoring and auditing the implementation of the gas and heating safety management policy across the group
- Ensuring that appropriate health and safety audits and inspections are carried out in all areas.

All Employees have the responsibility to abide by all information and training provided and promptly report any incidents regarding heating safety.

4. How we will monitor this policy

AGL is fully committed to continuous development and improvement of gas and heating safety performance. To meet this commitment, operational and compliance performance in relation to gas and heating safety will be monitored and reported every month by the Asset Team and the following information will be reported to the Operations Committee every quarter:

- % of properties with a valid Gas Certificate (≤ 12 mths)
 - % of properties with a valid annual Heating Certificate exc. Electric Heating (≤ 12 mths)
 - In addition, where customers have used the services covered by this policy and wish to provide feedback, including suggested improvements, these will be collated and used at the time of the review.
- We will 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 Chief Executive.
 - 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 AGL
 - To provide adequate assurance of asset information held, AGL will periodically undertake an asset data review to ensure that gas and heating safety data is accurate and up to date.
 - If a non-conformance issue is identified it will be immediately reported to the Director of Property Services
 - The Director of Property Services and ELT 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
 - The Chief Executive will ensure the Board are made aware of any non-compliance issues so they can consider the implications and act as appropriate

- In the case of a major non-compliance issue ELT and the 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
- The Health and Safety Team will periodically monitor the implementation of this policy and supporting procedures
- An independent audit of gas and heating safety arrangements will be undertaken at least once every two years
- A Specialist, accredited 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.
- 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 AGL'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).

5. Equality & Diversity

AGL is committed as an employer and provider of housing services to equality of opportunity for all. In addition to this statutory duty under the Equality Act 2010, it is further committed to developing a culture, which recognises wider social diversity in its communities and therefore respects and recognises the values and needs of individuals regardless of whether they belong to a particular section of society or group provided for by legislation.

The group will work with minority and vulnerable groups, support groups, resident forums, and external agencies to ensure they contribute to policy and service development.

All customers will have access to this document upon request.

This document can be translated or provided in alternative formats (e.g. large print, Braille, audio) upon request.

Equality and Diversity awareness training is mandatory for all staff.

Contractors delivering the service will be expected to follow AGL' Equality and Diversity Policy.

6. Data Protection

All parties referred to in this policy must abide by the 6 principles of the General Data Protection Regulations as detailed below:

- Lawfulness, fairness, and transparency
- Purpose limitations
- Data minimisation
- Accuracy
- Storage limitations
- Integrity and confidentiality

7. Procedures and other documents that link into this policy

The following procedures link to this policy

- Heating Safety Management Plan

8. Links to other policies,

Other policies and strategies that link into this policy are:

- Asset Management Strategy
- Lettable Standard
- Void Standard
- Repairs and Maintenance Strategy
- Electrical Safety Policy
- Health & Safety Policy
- Equality & Diversity Policy
- Data Protection Policy
- Development Policy

9. Legislation

In developing this policy, information, guidance, and references have been taken from the following:

- The Gas Safety (Installation and Use) Regulations 1998
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- The Building Safety Act 2022
- The Fire Safety Act 2021
- INDG285 Rev 3 Landlords: A guide to Landlords' Duties Gas Safety (Installation and Use) Regulations 1998'
- ACoP L56 'Safety in the Installation & Use of Gas Systems & Appliances' (5th edition)
- Gas Safety (Management) (Amendment) Regulations 2023
- Oil Firing Technical Association (OFTEC)
- Solid fuel & Bio-Mass – HETAS
- Building Regulations

- Health and Safety at Work Act etc. 1974
- The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health Safety & Welfare) Regulations 1992
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- Pressure Systems Safety Regulations 2000
- Pipelines Safety Regulations 1996
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Construction, Design and Management Regulations 2015
- Landlord and Customer Act 1985
- General Data Protection Regulation 2018
- RIDDOR 2013

10. When this policy will be reviewed

This policy will be reviewed every 3 years or in the event of a change in regulations.

11. Jargon buster

Reference	Definition
The Gas Safety (Installation and Use) Regulations 1998 (GSIUR)	The GSIUR 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
Landlords Gas Safety record (LGSR)	Regulation 36 'Duties of Landlords' of the Gas Safety (Installation and Use) Regulations 1998 requires landlords to provide their tenants with an LGSR within 28 days of the safety check being carried out.
IGEM	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.
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
Carbon Monoxide (CO)	CO 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.
Liquefied Petroleum Gas (LPG)	LPG is stored in bottles or tanks and is used to fuel gas boilers and fires where mains natural gas is unavailable or unviable.
Mutual Exchange	This is the process 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.
Immediate Re-let	This is the process 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.

12. Appendices

Appendix A – Gas & Heating Safety Management Plan