



homes, communities, cultures

Gas and Carbon Monoxide Safety Policy

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Version 2			
Version 1	25/10/2019	K McAllister	Introduced as part of Compliance review.

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1.0 Background

- 1.1. Connect Housing manages in the region of 3,000 tenanted properties and many of these properties have gas appliances installed.
- 1.2. This policy explains how Connect Housing's commitments to gas and solid fuel safety will be met. It will be supported by a Gas Safety Management Plan providing more detailed guidance and procedures

2.0 Objectives of the Policy

- 2.1 As a Landlord and Employer, Connect Housing are responsible for meeting all their statutory obligations. In addition, as a Landlord and provider of Social Housing, they must meet the Regulatory Standards contained within Homes England [Regulatory Framework for Social Housing](#)
- 2.2 A key objective of this Policy is to describe how Connect Housing will meet the required statutory, contractual and regulatory requirements in relation to gas and solid fuel safety.
- 2.3 In addition, Connect Housing must undertake a monitoring role to ensure that they are able to demonstrate a validated landlord compliance position, and in doing so, can provide assurance within the business, and to others external to the business, that statutory and regulatory standards are being achieved.
- 2.4 Connect Housing will discharge the landlord's duty specifically detailed in respect of the following legislation;
 - The Gas Safety (Installation and Use) (Amendment) Regulations 2018 (Regulation 36) to ensure; gas appliances/flues and installation pipe-work are maintained in a safe condition; undertake an annual gas safety inspection to properties where gas is either present or the potential for gas to be present exists.
 - Compliance with HETAS Guidance in respect to solid fuel heating systems.
- 2.5 To achieve 100% gas safety compliance. All homes will be provided with a valid Landlords Gas Safety Record (LGSR).
- 2.6 To ensure Connect Housing provide a safe environment for customers, colleagues and third parties to live and/or work.
- 2.7 Establish the key principles that Connect Housing will utilise to ensure gas, and solid fuel safety across the assets for which they are responsible. Solid Fuel and Oil fuelled appliances are not included within this Policy because none are present within the current stock.

2.8 Ensure that gas appliances and fittings we provide are properly maintained so that they remain in a safe, effective and efficient condition.

2.9 Further objectives of this policy are detailed below:

- Provide clear lines of responsibilities for the management of gas safety systems.
- Form part of Connect Housing's wider organisational commitment to health and safety as set out in its Health and Safety Policy.
- To ensure that all persons involved with the installation, inspection and servicing of gas appliances are properly trained and accredited.
- Provide a commitment to customers who are affected by carbon monoxide safety to communicate and raise awareness regarding the key issues.
- Encourage customers, through the provision of publicity information, to allow access to carry out checks and maintenance works which will contribute to their own safety.
- Put in place quality assurance and performance management arrangements to ensure that we are delivering excellent services to our customers.
- To provide a timetable for the review of the Gas and Carbon Monoxide Safety Policy
- Provide a service that recognises the diversity of our customers as well as being inclusive and respectful.

2.10 This document will be stored on Connect Homes Intranet for internal stakeholders and will be available to be viewed by external stakeholders via their web site.

3.0 Compliance with Regulatory Standards and Legal Obligations

3.1 The application of this policy ensures compliance with the regulatory framework for social housing in England, which requires all housing providers to 'meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes'.

3.2 Connect Housing will comply with all current and relevant legislation and specifically as detailed in the following:

The Gas Safety (Installation and Use) (Amendment) Regulations 2018 (Regulation 36) which requires the landlord to ensure that the following are maintained in a safe condition:

- a) Any relevant gas fitting; and
 - b) Any flue which serves any relevant gas fitting, to prevent the risk of injury to any person in lawful occupation of relevant premises
- 3.3 The HSE's view is that the maintenance of solid fuel appliances forms part of the landlord's undertaking, that the sweeping of chimney flues cannot be delegated to tenants, and that this requirement for maintenance can be enforced under section 3 (1) of the Act. Connect's current stock does not contain any Solid Fuel appliances, in recognition of the risks and additional maintenance requirements associated with these appliances. Connect will neither install nor give permission to tenants to install wood burning stoves. Any unauthorised appliances installed will be required to be removed.
- 3.4 Connect Housing takes the view that delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985, will also be met.
- 3.5 It is essential to ensure customers, residents, employees and visitors remain safe in our premises (both individual homes and offices). Failure to properly discharge our legal responsibilities may result in:
- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
 - Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
 - HCA serious detriment judgement
 - Reputational damage
 - Loss of confidence by stakeholders in the organisation

4.0 Scope

- 4.1 This policy relates to offices, general needs housing, supported housing, sheltered housing, other rented properties owned and managed by Connect Housing. It also covers communal areas including leaseholders/ shared ownership; other rented housing managed by Connect Housing on behalf of a third party; and remote plant and garages; unless other parties are explicitly specified as having statutory responsibility in a lease or management agreement.
- 4.2 This Policy is inclusive of Commercial and other boilers where a Written Scheme of Examination is required.
- 4.3 Annual checks to Air Source Heat Pumps, Ground Source Heat Pumps also fall within the remit of this Policy.
- 4.4 Maintenance of other forms of electric heating, will be covered within the Electrical Safety Policy and Management Plan.
- 4.5 Where properties are managed on behalf of a third party, the external property owner's, statutory responsibility will be as detailed in the terms of the management agreement.

- 4.6 This policy is applicable to heating appliance(s), and associated fittings/ pipe work and flues contained within premises which are fuelled by gas and solid fuel. All premises with the potential for a gas supply to be installed will be included within the annual inspection programme.

Property Classification.

- 4.7 All properties will be categorised according to their fuel type, and their potential to have a gas supply installed. This data will be held on Qlx database (or any database which supercedes it)

Record Keeping

- 4.8 The requirement whether to undertake a gas or solid fuel safety visit or not will be held within core housing management database system (“the database system”).
- 4.9 All records relating to this service are required to be kept for a minimum of 2 years.
- 4.10 Certificates associated with those visits will be held in an electronic document management system and shall be made available to the customer(s) of the premises.
- 4.11 We will carry out regular validation checks to identify whether properties are required to be added to or removed from the database.
- 4.12 Every two years we will undertake a comparison with a [Gas Industry Registration Scheme \(GIRS\)](#) registered company of gas data held against that held by the national grid. All properties identified as not having a gas supply will be reviewed, If it is identified that any properties have potentially had a gas supply installed a gas safety inspection may be necessary to determine if a gas supply has been installed.
- 4.13 A Landlords Gas Safety Record or other appropriate certification, will be completed for each new property at the time of first recording on the database system which could arise from:
- New Property Acquisitions
 - New Build
 - Refurbishment /property conversion
 - Change of fuel type
 - Change of Tenancy or Tenure (any reason)

Contractors Competency

- 4.14 Connect Housing has a responsibility to ensure that directly employed engineers and contractors are appropriately skilled and qualified and are competent to undertake the relevant services. The following controls will operate to ensure competence can be demonstrated:

- 4.15 Only Gas Safe registered companies, Gas Safe registered engineers, with the appropriate [Nationally Accredited Certification Scheme \(ACS\)](#) shall be engaged to undertake any gas related works for Connect Housing.

Internal Competency

- 4.16 Connect Housing will ensure that all colleagues undertaking key roles within the delivery and management of this area will have access to training and support applicable to their roles.
- 4.17 Where properties are managed on behalf of external owners and also where Connect properties are managed by 3rd parties, responsibilities for gas safety are set out in the terms of the management agreement.

5.0 Monitoring

- 5.1 **Connect Housing Board** are the Landlord and as such are the legal entity responsible for meeting the required standards. They require regular assurance on the performance of this Policy. Board will also oversee the discharge of the required standards and will receive regular reports on the performance of this policy and are accountable for ensuring its implementation. They will also ensure that appropriate governance arrangements are in place. The Board, through the Audit and Risk Management Committee, will receive regular summary reports on performance as detailed in this policy and be responsible for ensuring any necessary remedial action is undertaken to comply with the policy.
- 5.2 **Audit and Risk Committee** – will receive quarterly KPI reports and commentary on landlord compliance performance. They will draw any concerns they may have arising from such reports to the attention of the Board.
- 5.3 **Connect Housing Chief Executive Officer** will retain the overall responsibility for the monitoring of the consistent implementation of this policy.
- 5.4 **The Director of Home** shall have overall responsibility for Gas Safety and for implementing this policy. They shall appoint /nominate Principle Duty Holders for relevant areas of gas safety as described within this Policy
- 5.5 **Director of Finance and Resources and the Senior Manager Business Assurance** shall provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. Implementation of this policy and monitoring of audit feedback shall be the role of the Business Assurance Team who will also oversee the timetable for review of each Landlord Compliance service area.
- 5.6 **Data Governance** - gas and solid fuel servicing responsibilities will be held within a master database (Qlx). The completeness of the master database will be regularly validated and reconciled. The reconciliation will identify the addition or removal of any properties which require inclusion or removal from the programme i.e. new build, acquisitions, change of fuel etc. disposals and sales. The number of

Officers who can add or remove properties within the master database will be limited and closely managed. Other databases or spreadsheets used to manage the implementation of this Policy will also be reconciled with the master database on a regular basis.

5.7 **Key Performance Indicators** - weekly reports will be generated for designated senior managers direct from the QI databases to ensure compliance can be monitored against minimum agreed Performance Indicators. The Audit and Risk Committee (3 monthly) and Board (3 monthly as a minimum) will receive high level KPIs as follows:

- % of Properties with a valid and in date LGSR (including commercial and domestic boilers)

In addition to the above Performance Indicators weekly Management Performance reports will be generated for designated senior managers, and each Health and Safety Working Group meeting. The detailed MPI's will include

- % of properties with a current certificate
- % Contractor performance against access KPI
- Number of LGSR certificates rejected
- % of gas safety audits carried out (servicing)
- % of gas safety audits carried out (installs)
- % of gas safety audits passed
- % of air source, ground source heating systems with valid and in date certification

5.8 Commentary will be provided for any properties out of date to include the date they became overdue, days overdue, and their position within the legal process to bring them back into a compliant position.

5.9 **Audit and 3rd Party Quality Assurance** - this service area will be included within the cyclical Audit Programme which will review (in particular) adherence to policy, data and record keeping.

5.10 In addition, Connect Housing will seek additional independent (3rd Party) quality assurance to ensure they can robustly demonstrate gas and solid fuel safety compliance by procuring independent specialist to regularly inspect, monitor and report on the technical performance and quality of this business-critical service area.

5.11 Gas safety is a priority for Connect in order to ensure we provide our customer's with safe homes and this policy will be reviewed on a bi-annual basis. If, as a result of either the finding of the Internal Audit Programme, or other investigation, the service is not performing to the desired level then this will trigger an external strategic review.

6.0 Policy Statement

- 6.1 The Chief Executive, Directors and the Board of Connect acknowledge their moral and legal duty to ensure that all employees, tenants, and any other visitors to premises under Connect Housing's control, are adequately protected from all foreseeable risks that may arise in relation to gas safety.
- 6.2 In order to achieve this, Connect Housing will ensure that adequate resources are made available, suitable and sufficient LGSR's are conducted, and appropriate preventive and protective measures are identified and implemented in all premises under Connect Housing's control.
- 6.3 Connect Housing aims to provide a safe environment in which our tenants (and other relevant persons) are assured that the risk of gas safety related injury is minimised. Across our stock we have a variety of tenants and our approach will take into consideration additional needs for vulnerable, older, and mobility impaired residents.
- 6.4 In order to comply with regulatory standards and legal obligations, and to ensure the safety of its customers, staff, contractors and visitors to its properties, Connect Housing will:

Process

- Provide clear lines of responsibility for the management of gas safety.
- Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake gas safety checks, which shall include legal action when required.
- Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.).

Delivery

- 6.5 always ensure that the capacity to complete the annual programme of gas and solid fuel safety checks is provided. Front-line engagement and enforcement will be in place to obtain access to properties to conduct the gas and solid fuel safety checks, which shall include legal action when required.
- 6.6 The Customer Safety team will ensure that the Gas Contractor (Sure) maintain all records of attempted access, successful access, and gas certificates.
- 6.7 Landlords do not have a legal responsibility for carrying out the relevant safety check to appliances the tenant is entitled to remove from the relevant premises, however:
 - a) to ensure clarity the landlord will carry out the relevant Regulation 36 safety inspection of all gas heating/hot water appliances installed in the relevant premises. We will consider remedial action appropriate to risk.

- b) the Gas Contractor will carry out a visual risk assessment of tenant's gas cookers for evident safety related defects and the Gas Industry Unsafe Situations Procedure will be applied as necessary.
- 6.8 Where representatives of Connect Housing discover an appliance to be unsafe the information will be recorded on the Landlords Gas Safety Record (LGSR) and remedial action will be taken
- 6.9 Connect Housing will implement further measures to support the assurance of Gas and Solid Fuel safety:
- Install and maintain Carbon Monoxide Detectors/Alarms in accordance with the current procedure and log details onto the LGSR / Solid Fuel Safety Certificate.
 - Where necessary, operate a permit to work system when safety critical work is being carried out near to appliances and flues by engineers that are not Gas Safe Registered /HETAS or OFTEC approved.
 - Neither install nor give permission to tenants to install wood burning stoves. Any unauthorised appliances installed will be required to be removed.
 - Require that other tenant alterations should be prior agreed with Connect Housing before they are undertaken. Approval will not be unreasonably withheld.

7.0 Inclusive Services

- 7.1 Connect Housing puts people at the heart of everything we do, to ensure customers are happy with the service we provide. To do this, we always strive to provide an inclusive service.
- 7.2 To achieve our aims, we have put in place, a wide range of support tools and adaptations to services that can support our diverse customer base, including our vulnerable customers. In addition, we are constantly seeking to improve our service to customers and will continue to introduce new and innovative ways to achieve this.
- 7.3 While we treat all tenants and their homes with courtesy and respect, listening and responding to individual needs, we also recognise that our customers' safety, and that of visitors to their property is paramount. We must ensure that we gain entry to undertake appropriate safety checks, servicing and repairs. We will always try to work with the tenant to resolve any issues and gain entry and any relevant information is passed to the engineer to enable an appropriate response.
- 7.4 We operate in a community with wide social diversity and are committed to providing equal opportunities and value diversity. We will treat all tenants fairly, with respect and professionalism, regardless of gender, race, age, disability, religion, sexual orientation and marital status. We recognise the importance of working in partnership with our tenants to develop and continually improve our

services and raise standards, and will work in line with our Neighbourly Places team

- 7.5 All activities will be subject to compliance with the General Data Protection Regulations 2018.

8.0 Value for Money

- 8.1 It is our aim to continually assess opportunities to enhance our services to customers and actively involve our employees and customers to achieve value for money.
- 8.2 We continually look for the best value for money by sourcing the best materials at the best price. And we're always looking for ways to make our services work more efficiently and effectively.
- 8.3 There is a culture of "do the right things" and "do things right", helping ensure our service delivery is efficient, effective and economical.

Appendix 1 - Glossary of Terms

Definition

For the purpose of this policy the following terms will mean:

“So Far as Is Reasonably Practicable” this involves weighing a risk against the trouble, time and money needed to control it.

“Landlord” will mean Connect Housing.

“GAS Safe Register” (GSR) is the regulatory body for Gas Engineers that holds a register of all Gas Engineers who are legally allowed to work on gas appliances and installations.

“Heating Equipment Testing and Approval Scheme” HETAS are the governing body of solid fuel domestic heating appliances, fuels and services and are responsible for the registration of competent installers and businesses.

“OFTEC” establishes the standards for competence within the domestic oil heating and cooking industry. It promotes excellence in the oil heating and cooking industry by setting standards for manufacture, installation and maintenance of oil-fired appliances for the domestic consumer.

“The Health and Safety Executive” (HSE) is the Government Agency which is responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare.

“Responsible Person” is the occupier (tenant(s)) of the premises or, where there is no occupier or the occupier is away, the owner of the premises or any person with authority for the time being to take appropriate action.

“Landlord Gas Safety Record” LGSR is a form approved by the Health and Safety Executive which qualified Gas Engineers (Gas Safe registered) completes once the relevant safety checks have been carried out.

“Nationally Accredited Certification Scheme” NACS is the industry recognised and accepted route for operatives to gain a certificate of competence, needed to become a member of the Gas Safe Register.

“Gas Safe Registered Contractor” a Gas Safe registered company engaged by the landlord to carry out gas work on their behalf.

“Gas Appliance” means any appliance, fittings or flue operated using gas within premises owned or managed by the landlord.

“Gas Safe Engineer” the operative completing the gas safety check is qualified to work safely and legally on gas appliances. Only Gas Safe registered engineers can conduct gas works and issue a valid gas safety certificate.

“Gas Industry Unsafe Situations Procedure” (GIUSP) provides guidance to Gas Safe registered businesses and engineers for dealing with unsafe situations.

“Solid Fuel Appliance” will mean any appliance, fittings or flue operated using solid fuel within premises owned or managed by the landlord.

“National Association of Chimney Sweeps” is a professional trade association which promotes high standards for the sweeping, inspection and maintenance of chimneys

Appendix 2 - Current legislation applicable to this policy:

This policy operates within the context of regulatory and legal frameworks as follows:

- Gas Safety (Installation and Use) (Amendment) Regulations 2018
- Pressure Systems Safety Regulations 2000
- Gas Industry Unsafe Situations Procedure (GIUSP) – IGEM/G/11
- The Gas Safety (Management) Regulations 1996
- Compliance with HETAS guidance (solid fuel systems)
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999

Other Regulation and Guidance with potential impact includes:

- Homes and Communities Agency Regulatory Standard (The Home Standard)
- Leasehold Reform, Housing and Urban Development Act 1993 (section 121)
- Workplace (Health Safety & Welfare) Regulations 1992
- Landlord and Tenant Act 1985
- Occupiers Liability Act 1957 and 1984
- General Data Protection Regulations 2018
- The Construction Design and Management Regulations 2015
- The Control of Asbestos Regulations (CAR) 2012
- Equality Act 2010
- Housing Act 2004
- Control of Substances Hazardous to Health Regulations 2002