

Gas and Carbon Monoxide Safety Policy

At the time of Policy approval Flagship Housing Group owns and manages in the region of 30,318 tenanted properties. Approximately 64% of these properties have gas appliances installed. Communal Gas Boiler systems, Fossil Fuel Burning appliances (Fuel Oil/Solid Fuel), Electric Heating and Hot Water systems or Renewable Energy systems (Air or Ground Source Heat Pumps) serve the remainder.

Department	<i>Asset Management</i>
Policy Owner	<i>Head of Landlord Compliance</i>
Approved Date	<i>25th July 4, 2023</i>
Date for Review	<i>July 2024</i>
Approving Body	<i>Asset Management Committee</i>
Associated Legislation/Regulation	Health and Safety at Work Act (HASAWA) 1974, The Gas Safety (Installation and Use) (Amendment) Regulations (GSIUR) 2018, Gas Safety (Management) Regulations 1996, British Standards, Building Regulations
Equality Impact Assessment Date	<i>04/07/23</i>
Version Number	<i>V 1.1</i>

Purpose / Principles

This Policy explains how the safety and maintenance requirements for Gas Appliances and Installations (and those of other fuel types covered by this Policy) within Flagship’s Housing Stock will be met. Individual Gas Safety Procedures and Processes are contained in the associated Gas and Carbon Monoxide Safety Management Plan. It will also cover how Flagship’s Board, as Duty Holder, will receive assurance of statutory, legislative, and regulatory compliance.

Flagship Housing Group has a responsibility to maintain all installations and appliances owned by it within its Housing Stock to the required statutory, legislative, and regulatory standards.

Roles / Responsibilities

Role	Responsibilities	Frequency
Board	<ul style="list-style-type: none"> • They are the responsible legal entity and must oversee the discharge of the required standards. • They act as Duty Holders and are accountable for ensuring the implementation of this Management Plan and the associated Policy. • They will receive assurance through regular performance reports that the Management Plan and Policy are being implemented and that the regulations are being fully complied with. • In doing so they will ensure the safety of staff, tenants, Contractors, and the wider general public has not been compromised. • They will also ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested third parties, informed of the regulatory landlord compliance position. • The Board will be responsible for ensuring that any necessary remedial action, arising from performance reports, is undertaken to comply with the Policy and ensure that a regulatory landlord compliance position is maintained. 	6 Monthly/ Annually

Asset Management Committee	<ul style="list-style-type: none"> • Will receive Quarterly KPI reports and commentary on Gas Safety compliance performance. • They will receive Internal Audit reports, and monitor the delivery of managers' actions arising, through to successful completion. • They will draw any concerns they may have arising from such reports to the attention of the Board. 	Quarterly
The Chief Executive Officer	<ul style="list-style-type: none"> • Retains the overall responsibility for the monitoring of the consistent implementation of this Management Plan and Policy. • Through the implementation of the Management Plan and Policy to effectively comply with the regulatory standards. • If the regulatory standards are not maintained to report any breach in standards to the Regulator of Social Housing. 	Ongoing
Director of Strategic Asset Management	<ul style="list-style-type: none"> • Appoint/nominate sufficient resources to fulfil the Responsible Person roles for all Gas and other Fuel Safety requirements and use this Management Plan to define their duties. • Will ensure the operational delivery of this Management Plan and Policy and compliance with the regulations. • Will oversee the programme of Policy and Strategic Review. 	Ongoing
Director Legal and Governance	<ul style="list-style-type: none"> • Seek assurance that the regulations are being adhered to and regularly review Internal Service Provider and/or external Contractor operational practices and performance 	
Head of Landlord Compliance	<ul style="list-style-type: none"> • Agree and set budgets that are sufficient to meet the compliance requirements. • Will produce the Policy at the appropriate review dates. • Delegate appropriate authority for in-house delivery or procurement to meet the requirements. • Will manage the strategic implementation of this Management Plan and Policy and ensure compliance with all Regulations. 	Ongoing

	<ul style="list-style-type: none"> • Will formulate Programmes of Work consistent with the delivery of this Management Plan and Policy. • Will implement Data Governance Protocols. • Will oversee the preparation of the KPI/MPI and OPI reporting suite. • Will assist the implementation of this Management Plan and Policy through monitoring. • Will receive audit feedback and act upon the findings. 	
Compliance Manager	<ul style="list-style-type: none"> • Will manage the availability of accurate Stock Data and Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts. • Will instruct/liaise with internal operational managers and those of external Contractors in respect to the operational delivery of this Management Plan. • Will liaise with Neighbourhood Management/Housing Team and tenants to explain the importance of compliance and the need to achieve access to complete safety checks and works. • Managing tenant feedback (enquiries, complaints and compliments) handling and progress. • Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors (Internal and/or external) to address any delivery shortfalls. • Monitor the quality and correct storage of all certification and documents required to demonstrate Landlord Compliance. • Will provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. • Liaise with IT and ensure system(s) and interfaces operate effectively. 	
Gas and Other Fuel Contractors	<ul style="list-style-type: none"> • Operational delivery of Gas and other Fuel Safety checks and servicing to Non-Domestic and Domestic Stock to the required cycle (6 monthly or 12 monthly or as otherwise required). • Review Property addresses and reconcile with Contractor databases to ensure the programme remains accurate. • Liaise with tenants in relation to arranging/keeping appointments. 	Ongoing

	<ul style="list-style-type: none"> • Liaise with the Compliance Team in relation to access issues. • Update system(s) with accurate data in line with Data Protocols. • Provide appropriate, complete, and correct certification for all Gas and other Fuels Safety checks and servicing. • Provide Quality Assurance (QA) checks in accordance with the contract. 	
Tenant	<ul style="list-style-type: none"> • Agreeing to and keeping appointments to provide access. • Liaising with Flagship Group staff in relation to any poor service, failure to attend/poor repair etc. • Provide tenant satisfaction information. 	As required
Director, Health & Safety	<ul style="list-style-type: none"> • Deliver an internal assurance testing framework to provide assurance on operation procedures. • Provide critical friend support and advice 	Ongoing
Independent External Auditor	<ul style="list-style-type: none"> • Undertake 5% External Validation of Gas and other Fuel Safety checks in line with the Management Plan. 	Ongoing

Main Content

This Policy covers both domestic and commercial (e.g., communal and district heating systems) appliances including Gas-Fired, Solid Fuel (including biomass), Oil-Fired, Air and Ground Source Heat Pumps, Solar Thermal hot water. It also covers properties with a gas supply or a readily available gas supply (but no gas appliances) and other activities that are undertaken at the same time as servicing / inspection of the above appliances.

Maintenance of other forms of Electric-only Heating will be covered within the Electrical Safety Management Plan.

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

- Health and Safety at Work Act (HASAWA) 1974,
- The Gas Safety (Installation and Use) (Amendment) Regulations (GSIUR) 2018,
- Gas Safety (Management) Regulations 1996,
- British Standards,
- Building Regulations.

There is no similar, specific legislation for Solid Fuel or Oil-Fired appliances. However, Flagship Housing Group takes the view that other legislation such as the HASAWA 1974 and Landlord Tenant Act 1985 may be applied.

In addition, as a landlord and provider of Social Housing, Flagship Housing Group must meet the requirements of the Regulator of Social Housing's (RSH) Home Standard.

It is essential to ensure that tenants, residents, employees, and visitors remain safe in Flagship's premises (both individual homes and offices). Failure to properly discharge our statutory, legal, or regulatory responsibilities may also 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.
- RSH's scrutiny and potential determination of a breach of the Home Standard and serious detriment having been caused/potentially caused.
- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

To comply with statutory, legislative and regulatory standards and obligations, and to ensure the safety of our tenants, staff, contractors and other visitors to our properties, Flagship will:

Process:

Provide clear lines of responsibility for all appliances and heating systems within the scope of this Policy supported by written guidance in the Gas and Carbon Monoxide Safety Management Plan.

Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to conduct the Safety Checks and works, which shall include legal action when required.

Proactively assess available data for relevant information about the tenant to help gain access (disability, vulnerability, local connections, etc.).

Maintain a process for dealing with gas safety unsafe situations in accordance with the Gas Safety Regulations (IGEM/G/11 and associated).

Delivery

Target that all domestic properties with gas appliances, gas supplies, Solid Fuel or Oil-Fired appliances have a valid Landlord Gas Safety Record (LGSR) and/or Solid Fuel (HETAS) or Oil Safety (OFTEC) Certificate.

Inspect all properties with Air Source, Ground Source and Solar Thermal Heating/Hot Water annually and obtain appropriate documentation.

All other properties with potential to have a gas supply will be subject to an annual check to confirm that no gas supply has been installed.

Landlords do not have a legal responsibility for carrying out a Safety Check or maintenance to gas appliances owned by the tenant/s. However, at the time of the annual Safety Check, Flagship will also check all tenant owned gas appliances for safety. This will be done by means of:

1. A visual risk assessment check in line with Gas Safety (Installation and Use) 2018 - Regulation 26(9).
2. Application of the relevant Flagship Gas Safety Procedure.

This is to comply with other legislation such as HASAWA 1974 and Landlord and Tenant Act 1985, and to ensure any works completed by the tenant that may have been undertaken since the last Safety Check are identified. Any safety critical faults found on a tenant-owned appliance will result in the appliance being isolated and disconnected from the gas supply and the tenant informed. Flagship will not be liable for repairs to tenant owned appliances.

Ensure, where required, that Commercial Systems and Pressure Vessels have a Written Scheme of Examination.

Target that all Commercial Systems are inspected and serviced in accordance with manufacturer's requirements and the Written Scheme, but in any event at intervals of not more than 6 months and have a valid Landlord Gas Safety Record (LGSR)

Disconnect and Cap-Off the gas supply at the meter and make safe upon a property becoming void. When the property is then re-let, the gas supply is reconnected and a new Gas Safety Inspection will take place, with the issue of a new Gas Safety Certificate (LGSR). If a property is void for more than a 12-month period a Service/Inspection visit will be made around the anniversary date to ascertain that the gas supply is still capped and disconnected (unless the gas has been terminated at the highway outside the property by the transporter and we are in receipt of a disconnection certificate).

Prioritise defects and remedial works arising from Gas Safety Checks and apply a timescale for action, as detailed within the Gas and Carbon Monoxide Safety Management Plan.

Additional Safety Measures:

Install Carbon Monoxide Detectors in all properties where required – as detailed within the Gas and Carbon Monoxide Management Plan – and test these on an annual basis in conjunction with the annual Safety Inspection visits and record this test on the Landlord Gas Safety Record (or other applicable Record/Certification).

Test Smoke and Heat Alarms, where fitted, in conjunction with the annual Safety Inspection visits and record this test on the Landlord Gas Safety Record (or other applicable Record/Certification)

Neither install, nor give permission for tenants to install, wood burning stoves or open fires. Any unauthorised installations will be required to be removed by Flagship's appointed contractor at the tenant's own expense.

Other tenant alterations should be subject to prior notification, agreement, and appropriate landlord's permission from Flagship to proceed before they are undertaken – as is required by the Tenancy Agreement. Permission will not be unreasonably withheld.

Complete inspection regime to all dwellings that form part of a communal gas/oil heating system. Refer to Management Plan for scope of service.

Contractors Competency:

Only engage with Gas Safe Registered Companies and Gas Safe Registered Engineers, with the appropriate Nationally Accredited Certification Scheme (ACS) to undertake any gas-related works.

Ensure that contractors working with Solid Fuel appliances are competent to do so and hold current HETAS qualification and registrations, and those engaged in respect to Oil-Fired appliances are similarly OFTEC registered.

Carry out an assessment of all contractor competencies annually or at change of contract /contractor, as detailed within the Gas and Carbon Monoxide Safety Management Plan.

Internal Competency:

Maintain a Skills/Training Matrix to ensure that all staff undertaking key roles within the scope of this Policy have appropriate training.

Data:

Maintain an up-to-date Master Database of all properties that have a gas supply including those that may not have a live gas supply but can be readily connected to the gas grid.

For each relevant property, record and maintain up to date data confirming which of the appliances within the scope of this Policy exist and do not exist and the organisation's associated responsibility.

Where a requirement exists, hold data and certification relating to at a minimum the last two Safety Checks and the next due date.

Where a requirement does not exist hold appropriate evidence.

Maintain current and up to date records of remedial works for the entire portfolio, which will detail all recommendations from the Safety Checks. These records will include (i) Address and Risk Profile of the property, (ii) Detail of the Work Item required, (iii) Priority and Target Completion Date/s, (iv) Person Responsible, (v) Date of when the Work was Completed and (vi) Who it was Signed-Off by and (vii) Evidence of Completion.

EIA statement

An Equality Impact assessment was undertaken on this policy on 04/07/23 and all identified negative impacts have been mitigated.

Training statement

This Gas and Carbon Monoxide Safety policy will be trained to the Compliance Team, Asset Management Team, Flagship Services and Gasway.

Supporting documents

This policy is supported by:

1. The Gas and Carbon Monoxide Safety Management Plan
2. Gas Safety Operational Guidance Notes
3. The Landlord Compliance Policy

Measuring Effectiveness

Assurance:

Ensure that all persons involved with the installation, inspection, servicing and maintenance of Gas, Solid Fuel, Oil and Renewable Technology systems are competent to do so. This would include evidence and confirmation of persons being properly trained and accredited in accordance with this Policy.

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.

Carry out works-based assurance activity – including checks on certification and post-inspection of on-site works – to the level stated within the Gas and Carbon Monoxide Safety Management Plan. A proportion of such checks will be carried out by an Independent 3rd Party.

Set a timetable for the review of the Gas and Carbon Monoxide Safety Policy and the associated Management Plan.

Communication:

Encourage tenants, through the provision of publicity information on the importance of Gas and other Heating Safety, to allow access to carry out Safety Checks and maintenance works.

Implementation

This Policy is approved by Asset Management Committee and is effective from 25th July 2023.

Staff will be made aware of the Policy at priority training and a copy will be available on the Intranet and on the Board App. Where appropriate we will publish on our website.

This Policy should also be read in conjunction with the overarching Landlord Compliance Policy and the Gas and Carbon Monoxide Safety Management Plan.

There will be training provided for all those staff involved with the operational delivery and implementation of the Landlord Compliance requirements and obligations in respect to Gas and Carbon Monoxide Safety detailed within this Policy.

Consultation

This Policy is based on statutory, legislative, and regulatory requirements and, as such, consultation with tenants has not taken place. There has been consultation with Internal Teams within the Group.

Monitoring Performance

The following measures will be subject to reporting:

- % of Properties (against the stated Total Landlord Requirement) with a valid LGSR within the past 12 months.
- % of Properties (against the stated Total Landlord Requirement) with other Heating Types covered by this Policy with a valid certificate within the relevant period.
- % of Commercial Boilers and Pressure Vessels (against the stated Total Landlord Requirement) with valid certification within the relevant period.

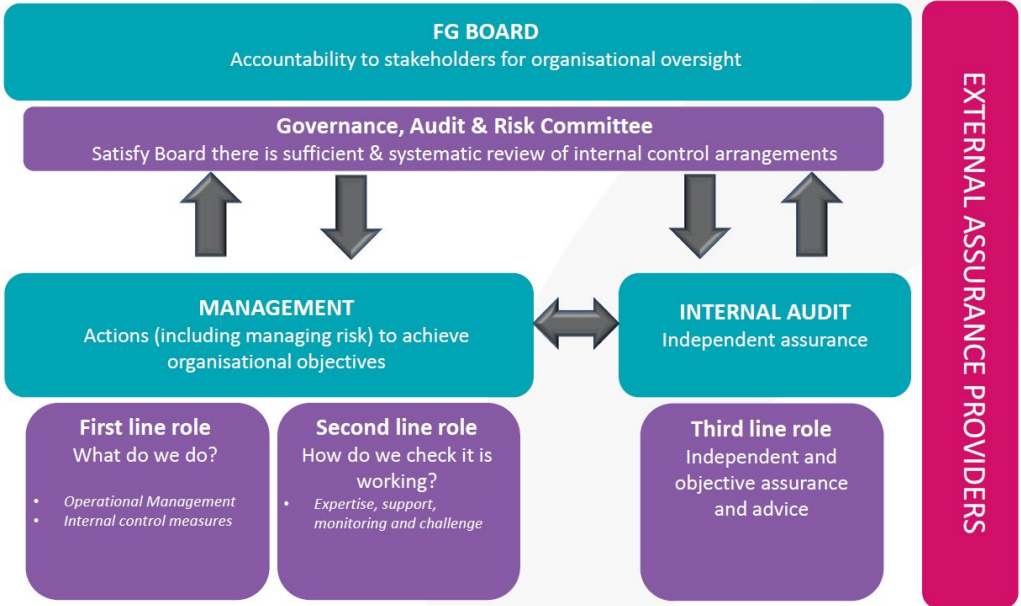
Commentary will be provided for any properties out of date, to include the date they became overdue, days overdue and their position within the access legal process to bring them back into a compliant position. Additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

A detailed Performance Indicator suite will be defined within the associated Gas and Carbon Monoxide Safety Management Plan.

Quality Assurance (QA) activity will be undertaken using our approach of three Lines of Defence (LOD) and typically over a three-year cycle. Outcomes of the audit program will be reported via the Flagship Group H&S Committee:



Assurance Framework



Review Period

The Policy will be reviewed annually or earlier if deemed necessary through the Performance Monitoring process.