



# Gas Safety Policy

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## **1. POLICY SUMMARY**

- 1.1. This policy covers the Gas Safety management to all properties and communal areas owned and/or managed by EPIC Housing.
- 1.2. The policy sets out the obligations of EPIC Housing and of the rights and obligations of its customers.
- 1.3. Installations in individual properties, as well as communal areas, are covered by this policy. Safety checks in leasehold or shared-ownership properties are not our responsibility and are therefore not covered by this policy. We will, however, exercise our duty of care towards these tenures and periodically remind them of the importance of undertaking regular servicing on their appliances by a suitably qualified, registered engineer.

## **2. APPLICABILITY**

- 2.1. This policy applies to:
  - All employees of EPIC Housing, regardless of employment status or contractual condition.
  - Board of Directors.
  - All tenants and occupants of property owned by EPIC Housing as detailed in the policy.

## **3. INTRODUCTION**

- 3.1. The policy sets out EPIC Housing's approach and responsibilities in ensuring compliance with all legal obligations in respect of Gas, Oil and Solid Fuel Safety under the terms of The Gas Safety (Installation and Use) Regulations, 1998 (as amended). This includes undertaking gas periodic safety inspections and the maintenance and servicing of gas, oil, solid fuel and renewable energy appliances, as well as carbon monoxide (CO) detectors and smoke detectors in line with the Smoke and Carbon Monoxide Regulations 2022.
- 3.2. This approach will ensure EPIC Housing provides the safety of all gas appliances, flues, and associated pipework, within all properties owned or managed by us. EPIC Housing accepts its responsibilities as a landlord to promote the health and safety of its tenants, and to ensure that the gas heating and other gas appliances it has provided are maintained so that they remain safe, effective, and efficient.

## **4. CONTEXT**

- 4.1. The principal legislation applicable for this policy is:
  - The Gas Safety (installation and use) Regulations 1998 (as amended). We are the 'landlord' for the purpose of this legislation.
  - Oil storage Regulations 2015
  - Smoke and Carbon Monoxide Regulations 2022

4.2. The policy also operates within the context of the following legislation:

- Health and Safety at Work Act, 1974
- The Building Regulations 2010 and 2022 amendments
- The Landlord and Tenant Act 1985
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction Design Management Regulations 2015

4.3. This policy considers the regulatory expectations as outlined within the Regulatory Framework for Social Housing in England.

4.4. Within this policy the term “gas appliances and fittings” is intended to refer to any gas appliance, flue, or installation pipework. This does not include supply pipes to premises that are the responsibility of the Statutory Undertaker, or appliances that are the property of the tenant, or leaseholder.

## 5. STATEMENT OF INTENT

5.1. EPIC Housing is required to meet all regulatory landlord responsibilities including, but not limited to, the following:

- Ensure that all gas appliances and fittings (including gas installation pipework and flues) provided by the landlord are maintained in a safe condition.
- To carry out a safety check on gas appliances and fittings in all properties at least once in every 12-month period.
- Where it has not been possible to carry out a gas safety check within the prescribed period due to access not being provided, ensure all reasonable steps to secure access will be taken. Including legal remedies available within the terms of the tenancy.
- New tenants are provided with a Landlord’s Gas Safety Record (LGSR) in relation to the most recent gas safety check prior to taking up occupation.
- Gas Safe Register-accredited gas engineers shall carry out gas safety checks, repairs, installations, and other relevant works.
- All alterations or works to a property must ensure that they do not make the existing gas installation defective.
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) require employers, the self-employed and people in control of premises to report specific incidents to the Health and Safety Executive, including:
  - Gas Safe-registered gas fitters must report dangerous gas appliances and fittings they find, and gas suppliers must report some flammable gas incidents.
  - Death or major injury arising out of carbon monoxide poisoning.
- All installations are to be kept in good repair and proper working order for the supply of gas and gas appliances.

- EPIC Housing's responsibility applies to all fittings and installations which cannot be legally removed by a tenant and does not extend to tenant's own fittings and appliances. A visual inspection will be made of a tenant's appliances at time of service, and these will be recorded on the annual LGSR. EPIC Housing will not be responsible for repair or replacement of a tenant's own appliance other than to make safe.
- To keep all LGSR Certificates for a minimum of 2 years after the date of completion.
- Ensure that EPIC Housing meets the regulation requirements of the Smoke and Carbon Monoxide Regulations 2022 to have an active smoke alarm on every floor of the building, and a CO alarm fitted where a fossil fuel burning appliance is present within the room, installed, tested and maintained to manufacturer's instructions.

5.2. To ensure we provide the above, EPIC Housing will follow its Gas Safety procedure and have measures in place to monitor and provide:

- In accordance with manufacturer's instructions, repair and maintain gas, oil, solid fuel and renewable energy installations, pipework, flues, and appliances owned by us.
- An annual safety check on all gas flues and appliances owned by us, including any communal appliances/boilers.
- Where chimneys are used to remove products of combustion, we will maintain these to ensure they are fit for purpose.
- Test and inspect smoke and CO detectors.
- Ensure that Contractors working on our behalf are Gas Safe registered, competent and have safe systems in place for the work to be undertaken.
- Ensure that all operatives undertaking annual safety checks or works to equipment and/or appliances owned by us are suitably qualified and experienced. We will check qualifications and registrations annually.
- Where tenants refuse us or our contractor access to undertake our legal obligations in conducting annual safety inspections, services, tests or where a possible fault is reported or suspected, we will take appropriate action. This includes the utilisation of robust legal proceedings and/or the cutting off or isolation of the supply if we suspect an appliance, system or the supply may be unsafe.
- Review all safety certificates to ensure that they are completed correctly and that any follow-up work is completed within target dates as set out in the Repairs Policy.
- When properties become empty (void) or are part of a mutual exchange, we will isolate ("cap") the gas / oil supply until the property is ready to be reoccupied. On reconnection a full gas / oil service and safety check will be undertaken, and the incoming tenants will be given a copy of the new gas safety certificate.

- Cookers or other appliances left in a property will be removed unless they are built-in and/or the responsibility of EPIC Housing, in which case they will be tested for operation and safety.
- Performance indicators in respect of the percentage of properties with a valid gas / oil certificate and the stage that properties without a valid certificate have reached.
- Carry out third-party gas auditing on a minimum 5% inspection of all gas services.

5.3. In relation to our service offering, EPIC Housing will:

- Respond to emergencies within two hours, in accordance with our Repairs Policy.
- Provide a visual check of any gas installations owned by the tenant.
- Offer to provide both written and verbal instruction on the heating and gas safety advice to all new tenants.
- 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 and at void stage.
- Audit the service on a cyclical basis in line with the internal audit program approved by the Board or a delegated Committee.
- All properties will be inspected regardless of whether they have a live gas installation.
- Provide an installation service for tenant-owned cookers in new tenancies to ensure that the works have been completed correctly by a qualified installer.
- Arrange appointments with tenants, providing a minimum of 7 days' notice.
- Offer appointments outside of office hours where required.
- Leave calling cards in cases of missed appointments.
- Disconnect the gas supply where a tenant states that they do not intend to use any of the gas appliances.
- If there is no credit on the meter, to allow the service to be completed, then the supply is to be isolated. Once the supply has been reinstated a new appointment is to be made for the completion of the annual inspection.

5.4. Where EPIC Housing or our contractors cannot gain access for the purpose of the annual gas servicing this is considered a serious breach of tenancy and EPIC Housing will use all legal means at its disposal to ensure that the annual gas service is completed.

## **6. RESPONSIBILITIES**

The roles and responsibilities for key stakeholders across EPIC are detailed below:

### **6.1. The Board**

- Reviews reports and/or performance indicators to assure itself that the measures detailed in this policy are met.
- Monitors and reviews compliance.
- Ensures legal requirements are met.
- Approves changes to the Gas Safety Policy.

### **6.2. The Chief Executive (Duty Holder)**

- Ensures that resources are made available to allow for the appropriate management of this policy.
- Is accountable for the proper implementation of this policy.
- Ensures that their responsibilities as the duty holder under the policy is managed to ensure full compliance.

### **6.3. Executive Team**

- Ensures that operational activities are compliant.
- Ensures that statutory duties are discharged and meets monthly to review progress and review operational risk to the policy.
- Amends the Gas Safety Policy and Procedure for approval by Board.
- Ensures landlord compliance and relevant monitoring within this policy.
- Sets out audit requirements to ensure this policy is compliant.

### **6.4. Head of Asset Management and Building Safety**

- Will work closely with the operational Compliance team to implement this policy.
- Ensures that legal obligations and policy measures are being adhered to and in line with budget.
- Ensures that comprehensive Gas Safety Policy and Procedural documents are in place to ensure safe working practices across all sections of the company.
- Takes responsibility for compliance with this Policy.
- Implements a policy review.
- Ensures that financial accounting expenditure relating to gas issues are monitored and included in future budget forecasts.
- Auditing the scheme as instructed by the executive team and/or board.
- Is responsible for the overall implementation and regular review of this policy, ensuring its objectives are achieved.
- Leads on the writing, implementation, monitoring and review of the Gas Safety Policy and associated policies and procedures.

- Is responsible for the compliance and performance indicator reporting to the Executive Team, Board, and the Chief Executive.
- Ensures that any compliance and/or H&S-related issues are brought to the attention of the Chief Executive and provides regular updates on service delivery against budget.
- Develops and implements operational procedures to deliver the policy objectives.
- Embeds the policy through staff training, learning and development.
- Monitors the overall effectiveness of the policy in terms of cost, quality and time.

#### **6.5. All employees and External Stakeholders**

- Are responsible for ensuring an understanding and adherence to this policy.
- Report any issue that requires repairs or maintenance whilst visiting any EPIC Housing property.

#### **6.6. Tenants**

- The tenancy agreements of all tenants of EPIC Housing allow access to all properties for the purpose of carrying out annual safety checks of gas installations or any other form of heating within a dwelling.
- The tenant is responsible for immediately reporting any concerns with gas, oil or solid fuel appliances and turning them off until they are checked by a suitably qualified, competent, and registered operative.

### **7. MANAGING GAS SAFETY**

- 7.1. EPIC Housing does not employ direct labour to maintain and certify gas safety in-house, we rely on a network of contractors to deliver our service.
- 7.2. EPIC Housing has systems and procedures in place which ensure contractors involved in the gas safety process are trained and have the necessary skills and experience to specify, complete necessary works, manage and monitor service delivery.
- 7.3. EPIC Housing will ensure there is a good line of communication between us, the contractor, and our tenants regarding gas safety in our homes. We will effectively manage expectations for the completion of a repair and ensure tenants are kept up to date on the progress.
- 7.4. EPIC Housing will comply directly and engage with contractors to ensure they comply with all relevant legislation in the delivery of our gas safety service.
- 7.5. Properties that are empty shall, during the void period, be made gas safe by way of the gas being capped at the meter and reinspected and certified safe upon a new customer taking residence. No property will maintain a live gas supply while unoccupied.

- 7.6. EPIC Housing contractors will carry out gas safety checks and servicing in line with:
- The manufacturer's instructions for each gas fitting.
  - The Gas Safety (Installation and Use) Regulations and the Health and Safety Executive Approved Code of Practice.
  - Gas Safe Register Guidance and any other relevant guidance.
- 7.7. If the gas safety check reveals an unsafe situation, the contractor will determine the appropriate action to be taken and inform EPIC Housing.
- 7.8. In dealing with unsafe situations EPIC Housing will comply with the procedure laid down in the Gas Industry Unsafe Situations Procedure. This procedure identifies unsafe situations on two levels:
- Immediately Dangerous – an appliance/installation which, if operated or left connected to the gas supply, is an immediate danger to life or property.
  - At Risk – an appliance/installation where one or more faults exist and which, as a result, if operated, may in the future constitute a danger to life or property.
- 7.9. EPIC Housing will be notified of any instance of the two above findings within 24-hours both verbally and in writing to the Head of Asset Management and Building Compliance.

## **8. SUPPORTING OUR TENANTS**

- 8.1. EPIC Housing will provide an annual LGSR to all gas-supplied properties as detailed in this policy; as part of this action EPIC Housing will provide a copy of the LGSR to the tenant.
- 8.2. EPIC Housing will provide customers with advice and assistance. We recognise that some of our customers may need help when it comes to the gas installations in their home. We may, entirely at our discretion, provide a service in addition to the statutory and contractual responsibilities, to assist our customers who may need support to meet the conditions of their tenancy for Gas Safety. Each request will be considered on a case-by-case basis.
- 8.3. EPIC Housing will provide appointments where possible to meet the tenant's need. Engaging and encouraging vulnerable tenants to maximise access, utilising out-of-hours appointments, and considering any other request on a case-by-case basis.



## **9. TRAINING**

- 9.1. EPIC Housing will ensure that staff who are accountable for the management of Gas Safety receive the relevant information, instruction, and training to become competent in the positions they hold.
- 9.2. EPIC Housing will provide the necessary equipment to carry out their duties safely.
- 9.3. EPIC Housing will carry out its duties to our employees in the following way:
  - At induction stage for new employees.
  - For all employees being exposed to new or increased risks due to being transferred or given a change of responsibilities.
  - Introduction of new work equipment or a change to equipment already in use.
  - The introduction of new technology.
  - The introduction of a new or revised system of work.
  - During refresher training.
- 9.4. All training needs will be structured in such a way as to assess the resulting levels of competency at the point of delivery.
- 9.5. The Head of Asset Management and Building Compliance is responsible for the day-to-day operational delivery of gas and heating-related servicing and maintenance and will be required to have a good working knowledge on the management of gas safety in occupied buildings. They will also be expected to proactively maintain their Continued Professional Development to keep up to date and abreast of relevant industry and legislative changes.

## **10. DATA VALIDATION**

EPIC Housing will:

- 10.1. Ensure we have accurate and up-to-date records of all servicing and safety checks carried out to properties, including remedial actions and that copies of relevant certificates / reports are held electronically.
- 10.2. Ensure that on completion of all new installations, we receive a commissioning certificate and properties are included in ongoing servicing and maintenance contracts.
- 10.3. Maintain an auditing schedule which will specify the minimum percentage of gas installations that are required to be audited.
- 10.4. Review all gas reports and certificates received to ensure that they are completed correctly and that any follow-up work is completed, and records updated.
- 10.5. Monitor performance on a monthly basis in relation to the percentage of properties with valid gas safety test and inspection certificate.

## **11. EQUALITY AND DIVERSITY IMPLICATIONS**

- 11.1. We are committed to ensuring and promoting equality of opportunity for all. We are opposed to discrimination on any grounds, including race, religion, gender, marital status, sexual orientation, disability, age, or any unjustifiable criteria. We are committed to developing a culture that values people from all sections of society and the contribution which each individual can make. We will ensure our approach to accessing properties is considerate to people's individual needs. We also adhere to the Equality Act 2010.
- 11.2. EPIC Housing recognises that some people experience disadvantage due to their socio-economic circumstances and will strive to ensure no person or groups of persons is treated with injustice due to their personal circumstances.
- 11.3. EPIC Housing will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make sure the central principles of the Human Rights Act (1998) will be adhered to.
- 11.4. An Equality Impact Assessment (EIA) has been carried out on this policy.

## **12. MONITORING / REVIEW**

- 12.1. EPIC Housing will record and monitor a range of financial and performance indicators to assess and improve the performance of managing Gas Safety in our homes. These will include:
  - Government return performance indicators as defined in TSM.
  - EPIC Housing corporate performance indicators for Board and ET.
  - Contractual performance indicators.
- 12.2. EPIC Housing will use a variety of methods to engage with our customers regarding the quality of managing Gas Safety and commit to using a listening and learning approach to continually improve the service we offer.
- 12.3. This policy will be reviewed annually. A review may be conducted earlier if there are significant changes to either legislation or EPIC's operating practices.

### **13. ASSOCIATED DOCUMENTS**

- Corporate Plan
- Asset Management strategy
- Repairs policy and procedure
- Damp and Mould policy & Procedure
- Disrepair procedure
- Customer Home Alterations policy
- Compensation policy
- Equality, Diversity, and Inclusion policy
- Violence and Aggression policy
- Safeguarding policy
- Data protection policy
- Health, Safety and Wellbeing Policy
- Tenancy Agreements
- Gas Safety Procedure

### Version Control

Date of Review	Reviewer	Version Number	Changes	Date of Next Review	Approved By
Sep 2022	J Mitchell	1.0	New Policy	Sep 2023	Board
Dec 2023	J Mitchell	2.0	Format, reworded sections and Minor changes	Dec 2026	Board