



# **Gas Safety, Heating and Hot Water Compliance Policy**






## 1.0 Introduction

- 1.1 This policy outlines Housing Plus Group's approach to managing the safety, maintenance, and compliance of gas, heating, and hot water (HHW) systems across all properties and workplaces under its control. It covers all fuel types, including gas, oil, solid fuel, electric, and renewable systems, and establishes a structured framework for inspection, servicing, emergency response, and assurance activities. The policy ensures alignment with statutory duties, including the Gas Safety (Installation and Use) Regulations 1998, and supports the Group's aim to protect residents, staff, and contractors while maintaining regulatory compliance and service excellence.

## 2.0 Policy Statement

- 2.1 Housing Plus Group (HPG) is committed to ensuring the highest standards of safety, compliance, and service delivery in the management of all gas, heating, and hot water (HHW) systems. This policy sets out the organisation's statutory and regulatory obligations, and defines how it will safeguard the health and wellbeing of residents, staff, and contractors. To achieve this, HPG will:
- 2.1.1 Maintain up-to-date records of all HHW systems and installations across its property portfolio.
  - 2.1.2 Conduct regular risk assessments and deliver ongoing maintenance to ensure system safety and functionality.
  - 2.1.3 Undertake routine inspections, servicing, and repairs in line with legal requirements and industry best practice.
  - 2.1.4 Respond promptly to gas leaks, carbon monoxide alarms, and fume incidents, and comply with RIDDOR reporting obligations.
  - 2.1.5 Complete safety inspections and servicing of all gas installations at intervals not exceeding 12 months for domestic settings and at least every 6–12 months for commercial systems.
  - 2.1.6 Ensure a Turn-On-And-Test (TOAT) safety inspection is carried out before the commencement of any new tenancy.
  - 2.1.7 Provide tenants with copies of the most recent Landlord Gas Safety Record (LGSR) within 28 days of inspection, or before tenancy start dates.
  - 2.1.8 Ensure all gas-related work is undertaken by engineers registered with the Gas Safe Register and competent in their designated categories.
  - 2.1.9 Enforce the Gas Industry Unsafe Situations Procedure (GIUSP) and ensure installations are made safe immediately where necessary.
  - 2.1.10 Adhere to relevant safety standards for all fuel types, including OFTEC for oil systems, HETAS for solid fuel, and MCS for renewable technologies.
  - 2.1.11 Immediately isolate and label installations deemed unsafe, reinstating only following a confirmed safety inspection.
  - 2.1.12 Maintain robust compliance records for each asset, including action plans and timeframes for follow-on works.

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- 2.1.13 Require all involved personnel—internal or contracted—to be demonstrably competent, qualified, and appropriately trained.
  - 2.1.14 Take all reasonable steps to gain access for safety checks, including legal enforcement where necessary.
  - 2.1.15 Undertake independent assurance activities, including internal and external audits, to drive continuous improvement in safety standards.
  - 2.1.16 Prohibit any refurbishment or works that compromise gas safety, such as flue obstructions, without appropriate checks and controls.

2.2 Further detail on operational delivery is provided in the Heating and Gas Procedure Manual, which should be read in conjunction with this policy.

### 3.0 Policy Scope


3.1 This policy applies to all properties, systems, and individuals under the responsibility of Housing Plus Group, including all staff, contractors, service providers, residents, and visitors who may be affected by gas, heating, and hot water (HHW) installations or services. The policy covers:

- 3.1.1 All general needs, leasehold, shared ownership, and void properties managed or owned by HPG.
- 3.1.2 Supported housing schemes, extra care housing, and regulated care settings.
- 3.1.3 Communal areas, plant rooms, and shared heating infrastructure.
- 3.1.4 Offices, depots, and other operational premises used by staff.
- 3.1.5 Domestic and commercial systems, including fossil fuel, electric, and renewable HHW installations.
- 3.1.6 New acquisitions, buy-backs, and properties transferred into HPG management.
- 3.1.7 Properties where no mains gas supply is recorded, which are subject to annual verification.

3.2 The policy also ensures alignment with the regulatory framework set by the Regulator of Social Housing, including the Home Standard, and supports HPG's statutory obligations under relevant health and safety legislation.


### 4.0 Definitions

- 4.1 **HHW (Heating and Hot Water):** Refers to all systems and infrastructure providing heating or hot water to domestic or non-domestic premises, including gas, oil, solid fuel, electric, and renewable systems.
- 4.2 **Duty Holder:** Housing Plus Group, as the legally responsible entity for ensuring compliance with gas and heating-related health and safety legislation.
- 4.3 **TOAT (Turn-On-And-Test):** A safety inspection conducted prior to the commencement of a new tenancy to confirm the safety and functionality of gas and oil installations.
- 4.4 **LGSR (Landlord Gas Safety Record):** A formal record produced following a gas safety inspection, confirming the condition of gas appliances and installations.

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- 4.5 **Cap-off:** The isolation of a gas supply at the meter using a secure blanking cap and a confirmed gas-tightness test.
  - 4.6 **Gas Safe Register:** The official register of engineers in the UK legally qualified to work on gas appliances.
  - 4.7 **CO Alarm (Carbon Monoxide Alarm):** A safety device that detects the presence of carbon monoxide and provides early warning to occupants.
  - 4.8 **GIUSP:** Gas Industry Unsafe Situations Procedure, the standard for identifying and categorising gas safety risks.
  - 4.9 **ID (Immediately Dangerous):** A classification under GIUSP indicating a serious safety risk requiring immediate disconnection or remediation.
  - 4.10 **AR (At Risk):** A classification indicating a potential but not immediate safety hazard; disconnection is advised with consent.
  - 4.11 **NCS (Not to Current Standards):** Observations that do not pose a safety risk but may not meet current industry standards.
  - 4.12 **CADRE / FILEIT:** Housing Plus Group's electronic systems used for managing compliance data and certification records.
  - 4.13 **EICR:** Electrical Installation Condition Report – a document that reports on the condition and safety of a property's fixed electrical installation following inspection and testing.
  - 4.14 **PAT:** Portable Appliance Testing – the testing of portable and movable electrical equipment to ensure safe operation.
  - 4.15 **Landlord's Electrical Installation:** Fixed wiring and electrical systems are maintained by HPG as the duty holder.
  - 4.16 **Competent Person:** An individual who has the necessary training, experience, and holds certification under a recognised self-certification scheme such as NICEIC, ECA, or NAPIT to safely perform electrical work in compliance with legal standards.

## 5.0 Roles and Responsibilities

- 5.1 **Board and Audit Committee:** Provide strategic oversight and ensure assurance structures are in place for gas and HHW safety compliance.
- 5.2 **Chief Executive and Executive Team:** Lead the organisation's compliance culture, secure resources, and set expectations for performance.
- 5.3 **Executive Director of [Insert Directorate]:** Acts as the senior sponsor of this policy, ensuring strategic alignment with wider asset and compliance frameworks. Named Health and Safety Lead under the Social Housing (Regulation) Act 2023.
- 5.4 **Director of [Insert Service Area]:** Accountable for operational oversight, service performance, and leadership of compliance and repairs teams.
- 5.5 **Head of [Insert Department]:** Holds tactical responsibility for programme implementation, quality assurance, and team management.
- 5.6 **Compliance Manager (Gas and Heating Safety):** Leads the operational delivery of this policy, managing inspection programmes, data integrity, and contractor performance.

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- 5.7 **Asset Management and Repairs Teams:** Schedule inspections, oversee contractors, and ensure timely responses to safety concerns and remedial actions.
  - 5.8 **All Staff and Contractors:** Responsible for reporting defects, following safety procedures, and participating in required training and audits.
  - 5.9 **Governance Team:** Ensures accurate designation of statutory Health and Safety Lead roles and maintains oversight in line with governance frameworks.

## 6.0 Ownership, Review, and Approval

- 6.1 **Policy Owner:** Director of [placeholder]
- 6.2 **Review Frequency:** Minimum of every three years or more frequently following legal or regulatory change.
- 6.3 **Approval Route:** Executive Management Team followed by sign-off by the Audit and Assurance Committee.

## 7.0 Applicable Legislation and Guidance

- 7.1 This policy supports compliance with all applicable legislation and sector standards relevant to gas, heating, and hot water safety. Key legislation includes:

### 7.2 Primary Legislation Applicable to this Policy:


- 7.2.1 Gas Safety (Installation and Use) Regulations 1998 (as amended).
- 7.2.2 Housing Health and Safety Rating System (Part 1, Housing Act 2004).

### 7.3 Key Approved Codes of Practice and Guidance:

- 7.3.1 IGEM/G/11 Edition 2 (Gas Industry Unsafe Situations Procedure)
- 7.3.2 HETAS Guidance (Solid Fuel Systems)
- 7.3.3 OFTEC Guidance (Oil-Fired Systems)
- 7.3.4 Approved Document L (Conservation of Fuel and Power, Volumes 1 & 2)
- 7.3.5 Manufacturer's Instructions for Heating Equipment
- 7.3.6 Pressure Systems Safety Regulations 2000 (PSSR)

### 7.4 Additional Relevant Legislation:


- 7.4.1 Health and Safety at Work Act 1974;
- 7.4.2 The Management of Health and Safety at Work Regulations 1999;
- 7.4.3 The Workplace (Health Safety & Welfare) Regulations 1992;
- 7.4.4 The Building Safety Act 2022;
- 7.4.5 Fire Safety (England) Regulations 2022;
- 7.4.6 Fire Safety Act 2021;
- 7.4.7 Regulatory Reform (Fire Safety) Order 2005; The Building Regulations 2010;
- 7.4.8 Provision and Use of Work Equipment Regulations 1998 (PUWER);
- 7.4.9 Consumer Protection Act 1987;
- 7.4.10 The Occupiers' Liability Act 1957 and Occupiers' Liability Act 1984;
- 7.4.11 Personal Protective Equipment at Work Regulations 2022;
- 7.4.12 Hazardous Waste (England & Wales) Regulations 2005 (as Amended);

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- 7.4.13 Control of Substances Hazardous to Health (COSHH) Regulations (as amended) 2002;
  - 7.4.14 Construction, Design and Management Regulations 2015;
  - 7.4.15 Defective Premises Act 1972;
  - 7.4.16 Landlord and Tenant Act 1985;
  - 7.4.17 Data Protection Act 2018;
  - 7.4.18 RIDDOR - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013;
  - 7.4.19 Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022;
  - 7.4.20 Gas Safety (Management) Regulations 1996;
  - 7.4.21 BS 7671: (as amended) Requirements for Electrical Installations;
  - 7.4.22 Mental Capacity Act 2005
  - 7.4.23 Care Act 2014
  - 7.4.24 Equality Act 2010
  - 7.4.25 Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
  - 7.4.26 The Control of Legionella in Healthcare Premises (HTM 04-01)
  - 7.4.27 Other Legislative, Normative (gas Standards) and Informative reference documents documented by Gas Safe within the Legislative, Normative & Informative Document List (as amended).

## **8.0 Policy Delivery Programme**

- 8.1 Housing Plus Group will implement a structured programme to manage the safety, servicing, and compliance of all heating and hot water (HHW) systems. This includes gas, oil, solid fuel, electric, unvented cylinders, and renewable technologies. The programme will include:
  - 8.1.1 Completion of annual gas safety checks and appliance servicing in all domestic properties, in line with the Gas Safety (Installation and Use) Regulations 1998.
  - 8.1.2 For commercial gas systems and communal heating plant, inspections will be carried out at intervals not exceeding 12 months, and at least every 6 months where required by risk profile or system complexity.
  - 8.1.3 Annual servicing and safety checks of landlord-owned appliances and systems across all fuel types, including:
    - Oil systems (to OFTEC standards),
    - Solid fuel/biomass systems (to HETAS standards),
    - Renewables such as air/ground source heat pumps and solar thermal (to MCS standards),
    - Electric heating systems, including unvented hot water cylinders (to manufacturer guidance and statutory requirements).
  - 8.1.4 Conduct a Turn-On-And-Test (TOAT) inspection before the start of any new tenancy, including voids and mutual exchanges.
  - 8.1.5 Perform safety inspections at every change of tenancy, following void periods or mutual exchanges, to ensure the safety and suitability of retained systems and appliances.




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- 8.1.6 Apply enhanced inspection frequencies for schemes identified as higher risk due to property type, condition, or vulnerability of occupants.
  - 8.1.7 Install and maintain carbon monoxide (CO) alarms where required by legislation, and test alarm function during safety visits.
  - 8.1.8 Ensure all works are carried out by qualified, certified professionals in accordance with the specific regulatory body for each system type (e.g. Gas Safe, OFTEC, HETAS, MCS).
  - 8.1.9 Apply legal access protocols for any properties where entry is not granted for scheduled safety inspections.

## 9.0 Follow-on Works

- 9.1 Housing Plus Group will ensure that any issues identified during safety inspections, servicing, or maintenance of heating and hot water (HHW) systems are categorised, tracked, and resolved promptly to maintain compliance and protect resident safety. For gas systems, the Gas Industry Unsafe Situations Procedure (GIUSP) will be applied. Defects will be categorised as follows:
  - 9.1.1 **Immediately Dangerous (ID):** Where an installation or appliance presents a serious and immediate safety risk, it will be made safe or disconnected before the engineer leaves the premises. A warning notice will be issued and recorded in line with internal procedures.
  - 9.1.2 **At Risk (AR):** If a situation is potentially dangerous but not immediately hazardous, the appliance or system will be disconnected with tenant consent. If consent is refused, the matter will be escalated to the operational lead.
  - 9.1.3 **Further Investigation Required:** If an issue cannot be fully assessed during the initial visit (e.g. incomplete combustion, ventilation problems), a follow-up appointment will be arranged within 7 calendar days.
  - 9.1.4 **Not to Current Standards (NCS):** Observations that do not pose an immediate safety risk but fall short of current best practice will be logged and reviewed for inclusion in future planned works programmes.
- 9.2 For **non-gas systems** (oil, solid fuel, electric, renewables), remedial actions will follow equivalent industry codes of practice and manufacturer guidance. Where systems are found to be unsafe or non-compliant:
  - 9.2.1 The affected appliance or installation will be isolated and labelled as out of use.
  - 9.2.2 Reinstatement will only occur after repairs are completed and safety is confirmed through reinspection.
- 9.3 All remedial actions, safety certificates, and warning notices will be stored electronically in CADRE and FILEIT and tracked for compliance monitoring. Any inspection resulting in an 'unsatisfactory' outcome will require full resolution before a new compliant safety record (e.g. LGSR or equivalent) is issued.

## 10.0 Communication and Notification



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- 10.1 Housing Plus Group will ensure that residents, leaseholders, local authorities, and other stakeholders are informed of the outcomes of HHW safety inspections, servicing, and any identified risks in line with legal and regulatory requirements:
    - 10.1.1 **Landlord Gas Safety Records (LGSRs)** will be provided to tenants within 28 calendar days of inspection and to new tenants prior to occupation, as required under the Gas Safety (Installation and Use) Regulations 1998.
    - 10.1.2 LGSRs for commercial or communal plant will be displayed in a visible location within the building or shared directly with affected leaseholders and managing agents.
    - 10.1.3 For **non-gas systems**, service records and compliance documentation (e.g. for oil, solid fuel, or renewable systems) will be made available to tenants or leaseholders upon request or in accordance with contractual or regulatory obligations.
  - 10.2 All safety certification and post-remedial documentation will be retained in CADRE and FILEIT, and made accessible to tenants via the Tenant Portal App.
  - 10.3 Residents will receive prior notice of safety inspections, servicing visits, or remedial appointments, including written or electronic confirmation of the date and purpose.
  - 10.4 Information on **carbon monoxide (CO) alarms**—including installation, testing, and response procedures—will be communicated during routine inspections and via resident safety materials.
  - 10.5 Where access cannot be gained, the legal access protocol will be applied and residents will receive escalation notices in line with internal procedures.

## 11.0 Data Management and Record Keeping

- 11.1 Housing Plus Group will maintain accurate and up-to-date records for all heating and hot water (HHW) systems, across all fuel types, to ensure effective compliance management and audit readiness:
  - 11.1.1 All inspection reports, servicing records, remedial actions, and certificates (including LGSRs, oil service sheets, and renewable equipment reports) will be stored electronically in CADRE and FILEIT.
  - 11.1.2 Records will be retained for a minimum of 10 years, in accordance with the Group's Records Management Policy and applicable statutory requirements.
  - 11.1.3 Data must be updated in real time, with access available to authorised staff for compliance monitoring, audit, and governance reporting.
  - 11.1.4 The Gas and Heating Compliance Manager will be responsible for maintaining data integrity and ensuring that all required documentation is complete and accessible.
  - 11.1.5 Tenants will be able to view key compliance records, including LGSRs and CO alarm information, via the Tenant Portal App.
  - 11.1.6 All data will be processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.





## 12.0 Resident and Stakeholder Engagement


- 12.1 The development of this policy has been informed by a review of legacy documents, input from third-party consultants, and consultation with internal stakeholders, including asset management, compliance, and repairs teams.
- 12.2 Housing Plus Group is committed to meaningful engagement with residents and staff in shaping the delivery of its compliance services. This includes using tenant engagement forums such as SPaCE, customer panels, or targeted feedback exercises to inform ongoing improvements to both policy and practice.
- 12.3 Feedback collected during service delivery—such as inspection outcomes, customer satisfaction surveys, and access challenges—will also inform future policy revisions.
- 12.4 The policy will be reviewed and approved through formal governance structures, including the Executive Management Team and Audit and Assurance Committee.

## 13.0 Competency and Training

- 13.1 Housing Plus Group will ensure that all individuals involved in the delivery, management, and oversight of heating and hot water (HHW) compliance are suitably qualified and competent:
  - 13.1.1 All contractors must hold appropriate registrations or scheme memberships, including but not limited to Gas Safe Register (gas), OFTEC (oil), HETAS (solid fuel), and MCS (renewables).
  - 13.1.2 Contractor credentials and scheme memberships will be verified annually to ensure continued eligibility to undertake regulated works.
  - 13.1.3 Internal staff involved in HHW contract management, compliance monitoring, or service delivery will complete formal refresher training every two years, relevant to their responsibilities.
  - 13.1.4 A central training matrix will be maintained for all compliance-related roles and reviewed quarterly to ensure coverage and identify development needs.
  - 13.1.5 Only engineers and operatives deemed competent for the specific system or appliance type will be permitted to carry out inspections, installations, or remedial works on behalf of HPG.

## 14.0 Performance Monitoring

- 14.1 Housing Plus Group will monitor the delivery and effectiveness of its heating and hot water (HHW) compliance programme through a structured set of key performance indicators (KPIs) and formal reporting mechanisms:
- 14.2 14.1 KPIs will include, but are not limited to:
  - 14.2.1 Percentage of homes with a valid Landlord Gas Safety Record (LGSR) or equivalent compliance certificate for other HHW systems.
  - 14.2.2 Completion rates for annual servicing and inspections across all HHW fuel types.
  - 14.2.3 Percentage of remedial actions completed within required timeframes.


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- 14.2.4 Access success rates and legal escalation instances.
- 14.3 14.2 Performance will be reported:
- 14.3.1 Monthly to the Executive Management Team, including operational metrics and exceptions.
- 14.3.2 Quarterly to the Audit and Assurance Committee, including emerging risks, non-compliance events, and assurance actions.
- 14.4 14.3 Trends and root cause analysis from performance data will be used to inform service improvements, contractor performance management, and policy revisions.

## **15.0 Quality Assurance**

- 15.1 Housing Plus Group will implement a proportionate and risk-based approach to quality assurance across all heating and hot water (HHW) systems, with an enhanced focus on gas safety due to its higher regulatory risk profile:
- 15.1.1 A minimum of 10% of all Landlord Gas Safety Records (LGSRs) and associated remedial works will be audited internally or externally each quarter to ensure compliance with statutory requirements.
- 15.1.2 Independent assurance will be provided by Morgan Lambert or an equivalent provider, including:
- 10% field-based audits (on-site inspections of completed gas works),
  - 10% desktop audits (review of gas safety documentation and system records).
- 15.2 Findings from audits will be used to:
- Address performance issues with contractors and staff through targeted rebriefs and training,
  - Identify systemic risks and emerging trends,
  - Inform continuous improvement planning and procedural revisions.
- 15.3 For other HHW systems (e.g. oil, solid fuel, electric, renewable), a risk-based sampling regime will be applied, with audits scheduled in line with service type, incident history, and regulatory requirements.
- 15.4 used to improve processes, rebrief staff or contractors, and identify trends.

## **16.0 Non-Compliance and Escalation**

- 16.1 Housing Plus Group will monitor compliance performance through CADRE and ensure that non-compliance issues, particularly relating to gas safety, are escalated in line with defined protocols:
- 16.1.1 Any overdue or failed inspections, servicing appointments, or remedial works—particularly in relation to gas systems—will be automatically flagged in CADRE.





16.1.2 Where an issue is not resolved within 24 hours of flagging, the following escalation pathway will apply:

- **Step 1:** Escalation to the relevant Head of Service.
- **Step 2:** If unresolved, escalation to the Director of [Insert Service Area].
- **Step 3:** Further escalation to the Executive Director of [Insert Directorate].
- **Step 4:** Immediate notification to the Executive Management Team (EMT) if a systemic risk or potential legal breach is identified.

16.1.3 Systemic failures or repeated non-compliance will be reported directly to the Audit and Assurance Committee for oversight and action.

16.1.4 For other HHW systems (oil, solid fuel, electric, renewables), any non-compliance will be managed through equivalent escalation channels, informed by associated risk level and statutory requirements.



	<b>Policy Control Sheet</b> <b>X Policy</b> <b>Policy reference number - 2025/</b>
<b>Policy Author</b>	
<b>Direct Lead</b>	
<b>Version</b>	
<b>Target audience</b>	
<b>Consultation</b>	HPG customer consultation Employee group / managers - Senior Managers – Executive Management Group – X Committee
<b>Date of Equality Impact Assessment</b>	No individuals or groups of people are disadvantaged by the adoption of this policy <state if this is the case and the date that the EIA was completed>.
<b>Date of Data Privacy Impact Assessment</b>	State if one is not required or the date of completion.
<b>Approving Body</b>	
<b>Date of final approval</b>	
<b>Implementation date</b>	
<b>Monitoring arrangements</b>	
<b>Reporting</b>	
<b>Review date</b>	
<b>Expiry date</b>	
<b>Review cycle</b>	
<b>Policy category</b>	
<b>Associated policies and procedures</b>	
<b>Policy location</b>	SharePoint HPG Hub Housing Plus Group website

### Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date