

Title:	Gas Safety Policy
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1.0 Introduction and Objectives

- 1.1 As a landlord, Women’s Pioneer Housing (WPH) is responsible for the maintenance and repair of our homes, communal areas, and other properties that we own and manage. Many of these properties include gas installations and appliances. The Gas Safety (Installation and Use) Regulations 1998 (as amended) govern the installation, maintenance, and use of gas appliances, fittings, and flues in domestic and certain commercial settings, ensuring they remain safe and compliant
- 1.2 In addition to gas systems, WPH is also responsible for maintaining other types of heating systems to ensure the safety of all appliances provided for tenant use. These include air source heat pumps and electrical heating systems.
- 1.3 The primary objective of this policy is to provide clarity to our Board, Senior Management Team, staff, partners, and tenants regarding WPH’s legal and regulatory responsibilities in relation to gas and heating safety. This policy outlines the framework within which our employees and contractors operate to meet these obligations.
- 1.4 This document also supports our broader commitment to promoting a strong health and safety culture, as outlined in our Health and Safety Policy and

Contractors Code of Conduct. The policy will be stored on the shared drive and made accessible to all relevant staff members.

2.0 Links to other policies

This policy complements the WPH Compliance Policy.

Contractors Code of Conduct

Health & Safety Policy

3.0 Policy Consultation

3.1 Individuals consulted in relation to the new/revised policy approval should be listed in the table below and all relevant comments detailed.

	Who	Date	Outcome
Resident consultation	N/A		
SMT/EMT consultation	SMT	23 June 2025	Approved with minor amendments
Staff consulted	N/A		

4. Legislation, Guidance and Regulatory Standards

- Landlord and Tenant Act 1995
- Health and Safety at Work etc. Act, 1974
- Management of Health and Safety at Work Regulations 1999
- Housing Act 2004
- Gas Safety (Installation and Use) Regulations 1998 as amended
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022.

4.1 This policy is underpinned by the following key legislation:

- The Gas Safety (Installation and Use) Regulations 1998 (as amended) – referred to in this policy as the *Gas Safety Regulations*. Under Part F, Regulation 36 (Duties of Landlords), WPH has a legal obligation to ensure the safety of gas appliances, fittings, and flues. For the purposes of this legislation, WPH is defined as the *Landlord*.
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 – which came into effect on 1 October 2022. These regulations place specific duties on landlords to ensure appropriate smoke and carbon monoxide alarms are installed and maintained in rental properties.

This policy also operates in the context of a broader legal and regulatory framework, as outlined in Appendix 1.5.

4.2 Approved Code of Practice (ACoP)

The key Approved Code of Practice relevant to this policy is:

- ACoP L56 – *Safety in the installation and use of gas systems and appliances* (5th Edition, 2018).

4.3 Guidance

The principal guidance supporting this policy includes:

- INDG285 – *A guide to landlords' duties: Gas Safety (Installation and Use) Regulations 1998 as amended, Approved Code of Practice and Guidance* (3rd Edition, 2018).

5.0 Scope

- 5.1 This policy applies to housing assets which are owned by WPH and any which are leased by WPH and rented and managed under its housing stock. This includes domestic properties (houses and flats) communal areas of any blocks containing such properties and older women's schemes.
- 5.2 This policy applies to all WPH employees, tenants, contractors, stakeholders, and any other individuals who may work on, occupy, visit, or use our premises, or who may be impacted by our activities or services.
- 5.3 The policy serves as a guide to ensure that everyone understands the responsibilities placed on WPH to maintain a safe environment for both tenants and staff within individual homes, communal areas, and all other properties we own or manage. Compliance with this policy is mandatory for all relevant parties.

6 The Policy

- 6.1 The obligations of WPH, as set out in the Gas Safety (Installation and Use) Regulations 1998 are to inspect and service gas installations on an annual basis. In meeting the terms of this legislation
- 6.2 We will ensure that all gas appliances (owned or acquired by the Landlord), flues and gas pipe work are maintained in a safe condition.
- 6.3 We will provide a visual inspection and gas soundness test for any property where there is a tenant owned appliance.
- 6.4 We will keep all records for a minimum of two years.
- 6.5 We will give a copy of Landlord's Safety Certificate to the tenants within 28 days of the safety check.
- 6.6 We will ensure that all new tenants are given a copy of the Safety Certificate prior to beginning their tenancy.
- 6.7 We will ensure that LGSR checks will be carried out prior to all new lettings (irrespective of whether one had been carried out less than 12 months previously including voids or any internal transfers).

- 6.8 We will ensure that any work carried out on the Landlord's behalf is carried out by a Gas Safe registered engineer.
- 6.9 We will ensure that the asset data is reconciled quarterly, however the records will be regularly checked on a weekly basis
- 6.10 All of our properties will be installed with smoke and carbon monoxide alarms as per the Smoke and Carbon Monoxide Alarm (England) Regulations 2015

7 Roles and Responsibilities

- 7.1 The Board of WPH have overall responsibility for health and safety performance. The Board holds overall governance responsibility for ensuring this policy is fully implemented and that WPH remains compliant with all relevant legislation and regulatory standards. As part of this role, the Board will formally approve this policy and ensure it is reviewed at least every two years or sooner if there are significant changes to legislation, regulation, or best practice.
- 7.2 To ensure this policy is effectively implemented in practice, the Board will receive regular updates on its application, including performance metrics related to gas and heating safety, as well as any instances of non-compliance. These updates will be provided through quarterly Board meetings to support ongoing oversight and assurance.
- 7.3 The Senior Management Team (SMT) and MMT will receive monthly performance reports on gas and heating safety to monitor compliance and ensure that legal and regulatory obligations are being met. The SMT will also be promptly informed of any identified non-compliance issues and will take appropriate action to address and resolve them.
- 7.4 The Chief Executive holds strategic responsibility for the management of gas and heating safety, ensuring that compliance with all relevant regulations is achieved and maintained. They will oversee the effective implementation of this policy across the organisation.
- 7.5 The Head of Contracts Compliance and Property Services holds operational responsibility for managing gas and heating safety. They oversee the delivery of related programmes and delegate day to day management and implementation to the Health, Safety and Compliance Manager.
- 7.6 Housing management teams will provide support in cases where gaining access to properties is challenging. They will assist in facilitating access and, where necessary, support any required legal processes to ensure compliance with gas and heating safety obligations.

8.0 Obligations -

8.1 The Gas Safety (Installation and Use) Regulations 1998 place specific duties on landlords to protect tenants living in their properties. The key landlord responsibilities under Regulation 36 include:

- Ensuring that all gas fittings and flues are maintained in a safe condition. Gas appliances must be serviced according to the manufacturer's instructions. If these are unavailable, it is recommended that appliances be serviced annually unless a Gas Safe registered engineer advises otherwise.
- Conducting an annual safety check on each gas appliance and flue, ensuring it takes place within 12 months of the previous check.
- Ensuring that all installation, maintenance, and safety inspections are carried out by a Gas Safe registered engineer.
- Keeping a record of each safety check for at least two years, or until at least two further safety checks have been completed.
- Providing a copy of the most recent safety check record to existing tenants within 28 days of the check or before new tenants move into the property.
- Displaying a copy of the latest safety check record in a common area when a gas appliance serves a communal heating system for multiple homes.
- Ensuring that no gas fittings prohibited under Regulation 30 (such as certain gas fires and instantaneous water heaters) are installed in rooms used or intended to be used as sleeping accommodation after the regulations came into effect, including any rooms converted to sleeping accommodation since then

8.2 The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, effective from 1 October 2022, require social landlords to:

- Install a smoke alarm on every storey of a property that contains living accommodation.
- Install carbon monoxide alarms in any rooms used as living accommodation that contain a fixed combustion appliance (excluding gas cookers).
- Repair or replace any faulty alarms as soon as reasonably practicable to ensure ongoing tenant safety.

9.0 Statement of Intent

9.1 We acknowledge and accept our responsibilities under the Gas Safety (Installation and Use) Regulations 1998, the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 (as outlined in Section 5), and all other relevant legislation.

9.2 We will carry out an annual gas safety check on all properties with a gas supply, regardless of whether the gas is currently connected.

9.3 Copies of all Landlord Gas Safety Records (LGSRs) and other relevant certificates will be provided to tenants or displayed in communal areas within 28 days of completion.

9.4 To comply with the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, effective from 1 October 2022, we will install, test, and

replace (as required) battery-operated and/or hard-wired smoke and carbon monoxide alarms during annual gas safety checks or at void stage. We have an installation plan with a target completion date of December 2025 to ensure every property is equipped accordingly.

- 9.5 Gas supplies will be capped off for properties that become void if a new resident is not moving in immediately, with capping completed by the end of the next working day following voidance.
- 9.6 For new build properties, gas supplies will be capped at handover from the contractor/developer if the tenancy does not commence immediately.
- 9.7 Gas safety checks will be conducted at void stage and within 24 hours of the start of a mutual exchange, or transfer, and tenants will receive a copy of the LGSR.
- 9.8 A gas safety check will be carried out following installation of any new gas appliance. This includes: a gas soundness test of the appliance casing, measurement of gas working pressures, visual inspection of the meter installation, and a safety check of all gas appliances and associated flues.
- 9.9 We will perform a five-point visual safety check on resident-owned gas appliances (gas cookers and fires), covering location, flueing, ventilation, signs of distress, and secure installation. Faulty appliances will be disconnected, and tenants will be required to provide a Gas Safe engineer's certificate confirming the appliance has been made safe.
- 9.10 Residents are not permitted to install their own fixed heating appliances (e.g., wood-burning heaters). Unauthorized installations must be removed. Where permission has been granted, WPH assumes responsibility for ongoing safety checks, servicing, and chimney sweeps unless otherwise agreed.
- 9.11 Safety checks will be conducted on completion of any repair or refurbishment works that may affect gas fittings, appliances, or flues in both occupied and void properties.
- 9.12 Smoke and carbon monoxide alarms (battery-operated or hard-wired) will be installed, tested, and replaced as necessary during annual gas safety checks or at void stage
- 9.13 Annual gas safety checks will also be performed on properties where the gas supply has been capped at the tenant's request. These checks will confirm the supply remains capped, assess the tenant's wellbeing, and evaluate the property's condition. Monthly communication will be maintained with these tenants regarding the status of their gas supply and any reinstatement requirements.
- 9.14 Any open flue gas appliances found in rooms used as bedrooms or sleeping accommodation will be removed

- 9.15 We will maintain a robust process to manage any immediately dangerous situations identified during gas or heating safety checks.
- 9.16 Properties not connected to the gas mains network will be regularly inspected to ensure no gas supply has been installed without WPH's knowledge.
- 9.17 Where access difficulties arise for safety checks or remediation works, we will follow a robust process using legal remedies after at least three access attempts. Resident vulnerabilities will be considered to safeguard wellbeing.
- 9.18 Effective contract management will be maintained with all contractors delivering these programmes, including ensuring contracts and service level agreements are in place, holding client-led performance meetings, and verifying that contractors' employee and public liability insurances are up to date annually
- 9.19 All replacements, modifications, and installations of gas appliances and heating systems will comply with Building Regulations, Part J: Combustion Appliances and Fuel Storage Systems.
- 9.20 A comprehensive risk assessment for gas safety management will be maintained, identifying key risks and corresponding mitigation measures.
- 9.21 In compliance with the Construction (Design and Management) Regulations 2015 (CDM), a Construction Phase Plan will be developed and reviewed annually for all repairs, component replacements, and refurbishment projects involving void or tenanted properties.
- 9.22 We will identify buildings requiring risk assessments under the Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002 and conduct assessments where necessary.
- 9.23 All RIDDOR notifications related to gas and heating safety will be thoroughly investigated and managed, with actions taken to address issues and prevent recurrence.

10. **Gas Servicing Programme**

- 10.1 Domestic Properties - We will ensure that a landlord's gas safety check is carried out in all properties where there is a gas appliance, within 12 months of the previous check. We will carry out an annual gas safety check on all domestic properties we own and manage. Each check will be completed within 12 months of the date of the previous Landlord Gas Safety Record (LGSR) or certificate.
- 10.2 A new inspection will be carried out at a change of tenancy, including transfers, mutual exchanges and terminations.
- 10.3 A copy of the certificate will be provided for all tenants.
- 10.4 We will carry out a safety check of electrical heating systems every five years, as part of the periodic electrical inspection and testing programme.

- 10.5 We will arrange a programme of gas servicing each year for individual and communal boilers to be carried out in conjunction with our contractors, giving our residents adequate advance notice of visits. We will carry out any remedial works required that are found during this programme. We will also collect condition reports to inform our boiler replacement schedule
- 10.6 If a property remains vacant for more than 1 year, although the gas supply will be capped off we will continue to have the yearly inspections.
- 10.7 Where we have installed a solid fuel appliance, or have given permission for a resident to install one, we will conduct an annual safety check and arrange for a chimney sweep at least twice yearly when burning wood or house coal. As solid fuel heating systems reach the end of their economic life, we will replace them with alternative heating solutions. Residents are not permitted to install their own fixed heating appliances, such as wood-burning heaters. Any unauthorized installations will be required to be removed.
- 10.8 We will carry out an annual safety check to properties with heat pumps and oil heating systems.
- 10.9 We will carry out an annual programme of gas safety checks and servicing for all communal blocks and Older Women's schemes covered by this policy, where we have a legal obligation to do so. These checks will be completed within 12 months of the date of the previous Landlord Gas Safety Record (LGSR) or certificate.

11. Record Keeping and Reporting

- 11.1 We will identify and record the presence of gas appliances within the properties owned and managed by WPH. We will maintain a core asset register of all properties we own and manage, including detailed component and attribute data for each property to track gas and heating safety check requirements. This is done by:
- 11.2 Recording the date of the last gas safety inspection for each property or building electronically. We will maintain gas and heating safety check dates and records for each property we own or manage. Currently, these records are held on C365 and will be migrated to the new Infinity system to ensure continued accurate and secure record management.
- 11.3 We will Electronically file the certificate for each property or building within 5 days of receipt
- 11.4 We produce at least monthly reports to SMT on flats/buildings which have in-date certificates, flats/buildings where certificates are due to expire and flats/buildings where certificates have expired.
- 11.5 We will provide summary statements using data drawn from the above reports to each meeting of the board.

- 11.6 Two Gas safety KPIs are included in the suite of KPIs which are reported to the Board and benchmarked through Housemark. One is for communal boilers, and one is for individual boilers. The KPI's relate to the percentage of dwellings that have a valid gas safety certificate and the target is 100%
- 11.7 We will implement a robust process to manage all changes to our assets, including property acquisitions and disposals, to ensure no properties are omitted from gas and heating safety programmes and that these programmes remain current and comprehensive
- 11.8 We will retain all completed safety check records, warning notices, and remedial work documentation for a minimum of two years, in line with our document retention policy. Robust processes and controls will be maintained to ensure the security and confidentiality of all gas and heating safety-related data and records

12. Competence and supervision

- 12.1 This involves ensuring that our gas safety engineers are properly qualified to carry out the relevant work. We employ external consultants to do this.
- 12.2 Only suitably competent Gas Safe accredited contractors will undertake works to gas/LPG fittings, appliances and flues. All gas engineers working in our properties must carry photo cards which have details of their qualifications (that can be checked on the Gas Safe website).
- 12.3 The Head of Contracts Compliance and Property Services or the Health, Safety and Compliance Manager who are responsible for the day to day management of the gas safety programme will hold a Level 4 VRQ in Gas Safety Management or a Level 4 VRQ Diploma in Asset and Building Management (if not Gas Safe registered). Additionally, they will maintain full membership of the Association of Gas Safety Managers (AGSM). If not already qualified, they will obtain these qualifications within 12 months of this policy's approval.
- 12.4 Through the tenancy agreement, residents will be informed not to interfere with gas metres as they are the property of the gas supplier company. This will be added to annual information on gas safety and inspections that sent out to residents.
- 12.5 Independent supervision of the work of our gas service engineers is overseen by appropriately qualified consultants. Our consultants will carry out a technical inspection of 10% of individual boiler works.
- 12.6 For communal boilers there will be one technical inspection by our consultants; two inspections by our insurers and two service visits each year by our gas contractors. These inspections will be evidenced by inspection reports to be filed appropriately in our Housing Management System and document filing systems.
- 12.7 All relevant internal staff will be provided with gas safety awareness training

- 12.8 Only suitably competent contractors accredited by the Oil Firing Technical Association (OFTEC) and/or HETAS will undertake work on oil-fired and solid fuel fittings, appliances, and flues.
- 12.9 Only individuals or organisations with Microgeneration Certification Scheme (MCS) accreditation will carry out work on ground and air source heat pumps, solar thermal systems, and biomass heating system
- 12.10 Only suitably competent NICEIC (or equivalent) electrical contractors and operatives will perform servicing and repairs on electrical heating systems.
- 12.11 Only suitably competent Gas Safe registered and NICEIC (or equivalent) third-party technical auditors will conduct quality assurance checks.
- 12.12 We will verify that all contractors hold the relevant qualifications and accreditations at the time of procurement and conduct annual reviews thereafter. All checks and contractor certifications will be appropriately documented and evidenced.

13. Resident Engagement

We recognise that effective communication is essential to the successful delivery of gas and heating safety programmes. Therefore, we will develop a resident engagement strategy and communication programme to support tenants in understanding gas and heating safety requirements and processes.

- 13.1 WPH has a robust system of advising our residents of the need for and timing of gas safety inspections.
- 13.2 WPH regularly reinforces the message of the importance of gas safety in our quarterly newsletters and on our website.
- 13.3 Feedback will be sought from residents on the completion of the gas service programme.
- 13.4 We are able to offer some flexibility with appointments to accommodate residents who work long hours or have special circumstances.
- 13.5 We will pursue legal remedies to ensure access where access is currently problematic or has been so in the past. We will seek to recover all such costs from the residents who have refused to engage with us to provide access.
- 13.6 We will advise tenants of their responsibility to report any repairs or defects on their smoke and CO detectors

14 Significant Non Compliance and Escalation

- 14.1 We define significant non-compliance as any incident that has the potential to result in a material breach of legislation or regulatory standards, or that poses a risk to health or safety. All instances of non-compliance must be reported and

escalated as soon as possible and no later than 24 hours after the incident occurs or a WPH employee becomes aware of it.

- 14.2 Any non-compliance issue identified at an operational level must be formally reported to the Health, Safety and Compliance Manager in the first instance. The manager will determine and agree on an appropriate course of corrective action in consultation with the Head of Contracts Compliance and Property Services (HOCCPs). The HOCCPs will then report the details of the non-compliance to the Senior Management Team and the Chief Executive.

15 Equality & Diversity

- 15.1 Throughout the gas service programme we will treat all residents fairly and in accordance with our Equality and Diversity Policy. We will respect all nine protected characteristics of the 2010 Equality Act. Therefore we will work to the utmost standards of professionalism regardless of a resident's gender, age, ethnicity, disability, religion, sexual orientation, gender reassignment, marital status or conditions of pregnancy or maternity

16 Quality Assurance

While WPH staff carry out regular contract monitoring and compliance checks, we recognise that certain safety critical areas require specialist technical expertise. In these cases, external consultants are engaged to provide independent verification and assurance WPH ensures they meet the following requirements:

- They are appropriately qualified and competent, with relevant technical credentials and demonstrable experience in their field.
- They provide current professional indemnity and public liability insurance certificates.
- Their advice and audits are aligned with relevant legislation, British Standards, and sector best practice.

This approach ensures that WPH receives independent, expert validation of compliance activities, particularly where internal capacity does not cover specialist areas. All consultant activity is subject to WPH oversight and forms part of our broader QA and governance framework

17 Contact Officer

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Appendix 1.

This policy also operates within the context of the following legislation:

- Health and Safety at Work Act 1974
- Gas Safety (Management) Regulations 1996 (as amended)
- Housing Act 2004
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- Defective Premises Act 1972
- The Occupiers' Liability Act 1984
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Workplace (Health, Safety and Welfare) Regulations 1992
- Pipelines Safety Regulations 1996
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Pressure Equipment (Safety) Regulations 2016
- Pressure Systems Safety Regulations 2000
- Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002
- Building Regulations 2010 (England and Wales)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018