



Gas and Heating Policy

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03332 31 32 33

connexus-group.co.uk

hello@connexus-group.co.uk

[@weareconnexus](https://www.instagram.com/weareconnexus)

Version Control

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1.0		26 Sep 24	31 Aug 26	Update to existing procedure.

Introduction

1. Purpose

- 1.1 Connexus is responsible for the maintenance and repairs to its homes and other buildings, many of which will contain gas installations and appliances. The Gas Safety (Installation and Use) Regulations 1998 (as amended) specifically deal with the installation, maintenance and use of gas appliances, fittings and flues in domestic properties and certain commercial premises. The regulations also place a legal duty on landlords to ensure that gas appliances, fittings and flues provided for tenants' use are safe.
- 1.2 Connexus is also responsible for maintaining other types of heating systems to ensure that all appliances, fittings and flues provided for tenants' use are safe. These include gas, ground source heat pumps, solid fuel, oil, liquid petroleum gas (LPG), communal biomass boilers and electrical storage heaters.

2. Scope

- 2.1 Scope: The policy applies to the whole of the Group. This means Connexus Homes Limited, (ultimate parent) and all of its subsidiaries.
- 2.2 Connexus must establish a policy which meets the requirements of the Gas Safety (Installation and Use) Regulations 1998 (as amended). In addition to this, the policy must provide assurance to Connexus Group and Board that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with gas fittings, appliances and flues.
- 2.3 Connexus must ensure compliance with gas safety legislation is formally reported at Senior Management team (SMT) and Board level, including the details of any non-compliance and planned corrective actions.
- 2.4 The policy is relevant to all Connexus employees, tenants, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 2.5 It should be used by all to ensure they understand the obligations placed upon Connexus to maintain a safe environment for tenants and employees within the homes of each tenant, and within all communal areas of buildings and other properties (owned and managed).

3. Regulatory Standards, Legislation, and Codes of Practice

- 3.1 **Regulatory Standards** – The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH).
- 3.2 **Legislation** – The principal legislation applicable to this policy is ‘The Gas Safety (Installation and Use) Regulations 1998 (as amended). Connexus has a legal obligation under Part F, Regulation 36 of the legislation (Duties of Landlords) and is the ‘Landlord’ for the purposes of the legislation. Connexus is the ‘Landlord’ by virtue of the fact that they own and manage homes and buildings housing tenants/leaseholders through the tenancy, lease and license agreement obligations it has with the tenants/leaseholders.
- 3.3 **Code of Practice** – The principal approved codes of practice applicable to this policy are as follows:
- ACoP L56 - ‘Safety in the installation and use of gas systems and appliances’ (5th edition 2018)
 - INDG285 - ‘A guide to landlords’ duties: Gas Safety (Installation and Use) Regulations 1998 as amended Approved Code of Practice and Guidance (3rd Edition 2018)
- 3.4 **Sanctions** – Connexus acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health and Safety Executive under the Health and Safety at Work etc. Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.
- 3.5 **Tenants** – Connexus will use the legal remedies available within the terms of the tenancy agreement, lease or license should any tenant refuse access to carry out essential gas safety checks, maintenance and safety related repair works. This will be via ‘legal proceedings’.

4. Additional legislation

- 4.1 How will we know the policy works and how we will monitor how we are doing?
- 4.2 This gas and heating safety policy also operates in the context of the following legislation:
- Health and Safety at Work etc. Act 1974
 - The Management of Health and Safety at Work Regulations 1999
 - The Workplace (Health, Safety and Welfare) Regulations 1992
 - Gas Safety (Management) Regulations 1996 (as amended)

- The Building Regulations in England and Wales
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- Pressure Equipment Regulations 1999
- Pressure Systems Safety Regulations 2000
- Pipelines Safety Regulations 1996
- Heat Network Regulations 2014
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Construction (Design and Management) Regulations 2015
- Landlord and Tenant Act 1985
- Data Protection Act 2018
- RIDDOR 2013 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Homes (Fitness for Human Habitation) Act 2018

5. Obligations

5.1 The Gas Safety (Installation and Use) Regulations 1998 (as amended) impose duties on landlords to protect tenants' safety in their homes with respect to gas safety. The main duties as a landlord are set out in Regulation 36 requiring landlords to:

- Ensure gas fittings and flues are maintained in a safe condition. Gas appliances should be serviced in accordance with the manufacturer's instructions. If these are not available, it is recommended that they are serviced annually unless advised otherwise by a Gas Safe registered engineer.
- Ensure the annual safety check is carried out on each gas appliance and flue within 12 months of the previous safety check.
- Have all installation, maintenance and safety checks carried out by a Gas Safe registered engineer.
- Keep a record of each safety check for at least 6 years.
- Issue a copy of the latest safety check record to existing tenants within 28 days of the check being completed, or to any new tenant when they move in.
- Display a copy of the latest safety check record in a common area of a building where the gas appliance serves a communal heating system to multiple homes.

5.2 In addition, landlords must ensure that no gas fitting of a type that would contravene Regulation 30 (e.g. certain gas fires and instantaneous water heaters) is fitted in any room occupied or to be occupied as sleeping accommodation after the Regulations came into force. This includes any room converted into such accommodation after that time.

5.3 These obligations apply to both gas heating and liquid petroleum gas heating systems.

5.4 Other heating types – with regards to all other heating types as set out in 1.2 of this policy, although there is no legal requirement for carrying out safety checks, Connexus will complete an annual safety check for all properties with these heating types, in exactly the same way as they do for properties with gas and LPG. The competent person will require alternative qualifications which are set out in section 11 of this policy.

6. Statement of Intent

- 6.1 Connexus acknowledges and accepts its responsibilities under the Gas Safety (Installation and Use) Regulations 1998 (as amended).
- 6.2 Connexus will hold accurate gas and heating inspection dates and inspection records against each property it owns or manages electronically.
- 6.3 Connexus will request the internal gas/heating engineers visit all properties on an annual basis to carry out gas and/or heating safety checks, irrespective of whether the property has a gas supply or not (other than those properties not on the gas mains network). Additionally, these properties will be subject to sections 3.5 of this policy irrespective of whether they have a gas supply or not.
- 6.4 Connexus will ensure that each property requiring a gas/heating safety check and/or service will have a landlords' gas safety record (LGSR) or equivalent that has a completion date not more than 12 months following the completion date of the previous LGSR (or equivalent) relating to the property or installation date of new installations.
- 6.5 Connexus will make use of 2018 amendments to the Gas Safety (Installation and Use) Regulations. The introduction of Regulation 36a allows for any servicing work required in a specific property to be completed up to two months before the anniversary of a previous check. This can be done without compromising the existing expiry date on a previous check at the property. The certificate will still retain the existing expiry date.
- 6.6 Connexus will ensure that copies of all LGSRs/certification are provided to tenants within 28 days of completion or displayed in a common area where necessary within 28 days of its completion.
- 6.7 Connexus will cap off gas supplies to all properties when the property becomes void, and a new tenant is not moving in immediately following the previous tenant leaving. This will be completed by the end of the next working day.
- 6.8 Connexus will cap off gas supplies to all new build properties at handover if the new tenancy is not commencing immediately at the point of handover.
- 6.9 Connexus will ensure that gas safety checks are carried out prior to, or immediately following the commencement of any new tenancy (void or new build properties), mutual exchange and/or transfer and that the tenant receives a copy of the LGSR prior to, or immediately after moving in.
- 6.10 Connexus will carry out a gas safety check following any new gas appliance installation. The safety check will include a gas soundness test of the system pipework, a visual inspection of the meter installation and a visual inspection including the safe working operation on all other gas appliances and associated flues within a property, issuing a gas safety certificate to confirm the necessary checks have been completed.
- 6.11 Connexus will carry out a visual check of tenant owned appliances. This includes a 5 point visual safety check for gas cookers and gas fires where the manufacturers' instructions are available (location, flueing, ventilation, signs of

distress and stable and secure). Where appliances are found to be faulty these will be disconnected, and a warning notice issued to the tenant.

- 6.12 Connexus will identify which properties have a hard-wired smoke alarm or CO alarm as part of the annual gas safety check visit. Connexus will ensure that all properties have a hard-wired smoke alarm system within two years of adopting this policy. Where CO alarms are not present at the time of the safety check, Connexus will install the requisite number of CO alarms at the appropriate locations. If at the time of safety checks the existing CO alarms have reached or are approaching their end of life, they will be replaced.
- 6.13 Connexus will carry out an annual gas safety check to all properties where the gas supply is inactive (capped) at the request of the tenant or where there is no gas supply to the property. This is to ensure that gas supplies have not been reconnected/installed by the tenant, and to ensure continued compliance with the requirements of the Gas Safety (Installation and Use) Regulations 1998 (as amended). Section 3.5 of this policy will apply to these properties.
- 6.14 In any instance where a property has a capped supply Connexus will write to the tenants every six months to ensure the property remains capped and inform the tenant of what is required in order to reinstate gas at the property.
- 6.15 Connexus will carry out annual assessments of properties where tenants have chosen for personal reasons not to use the gas supply in the property. This is to check on the tenant's wellbeing and also to assess that the lack of gas heating is not adversely affecting the condition of the property.
- 6.16 Connexus will ensure that only suitably competent Gas Safe accredited engineers undertake gas or LPG works for the organisation. Section 11 of this policy sets out the competency required to carry out safety checks for other heating types.
- 6.17 Connexus will remove any open flue gas appliances found in any rooms that are being used as bedrooms.
- 6.18 Connexus will carry out two access attempts to gain access to carry out essential gas/heating safety related inspection and remediation works, prior to triggering the legal process.
- 6.19 Connexus will have a robust process in place to gain access to properties where tenant vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.
- 6.20 Connexus will establish and maintain a plan of all continuous improvement activity undertaken with regards to gas/heating safety.
- 6.21 Connexus will ensure that where applicable all solid fuel, chimney stacks, oil fired appliances and flues are inspected and maintained at least annually and that this work is completed by a suitably competent engineer.
- 6.22 Connexus will ensure that all contractors' employee and public liability insurances are up to date on an annual basis.

- 6.23 Connexus will ensure contracts/service level agreements are in place with external contractors responsible for delivering the compliance service.
- 6.24 Connexus will ensure there are effective contract management arrangements in place, in the form of client-led meetings taking place regularly, with standard agendas and minutes produced, key performance indicators analysed and programmes and performance scrutinised.
- 6.25 Connexus will ensure that all replacements, modifications and installations of gas appliances and heating systems within its properties will comply with all elements of Part J Combustion Appliances and Fuel Storage Systems, of the Building Regulations.
- 6.26 Connexus will implement a robust process to deal with all changes to stock, including new property acquisitions, disposals and stock transfers, in order to ensure that properties are not omitted from the compliance programme, and to ensure the programme remains up to date.
- 6.27 Connexus will ensure that there is a robust process in place for the management of immediately dangerous situations identified from the gas/heating safety check.
- 6.28 It is Connexus' policy to move away from solid fuel heating and install a more energy efficient heating system that will meet the requirements of the Fuel Poverty (England) Regulations 2014. Where primary solid fuel heating fails or becomes uneconomical to repair the system will be replaced with an alternative controllable heating system other than solid fuel. In addition, secondary solid fuel systems will only be maintained if they form part of the specification for alternative heating systems. The Connexus policy on solid fuel open fires used as a secondary heating source and where flues are identified as being unsuitable for the appliance or failing flue pressure testing is to have them decommissioned. Solid fuel heating systems and flues will be decommissioned at change of tenancy. Where secondary flues are to be decommissioned, affected tenants will be kept informed of any decisions or alternatives open to them.

7. Compliance Follow-Up Work

- 7.1 Connexus will ensure there is a robust process in place for the management of any follow-up works required following the completion of a gas/heating safety check.
- 7.2 Carbon monoxide (CO) detectors have been installed in all domestic properties containing gas, lpg, oil or solid fuel appliances.
- 7.3 A safety check will be carried out on completion of any repair and/or refurbishment works to occupied or void properties where works may have affected any gas fittings, appliances or flues.

8. Record Keeping

- 8.1 Connexus will establish and maintain a core asset register of all properties that have an active or inactive gas supply. This register will also hold data against each property asset of gas or other heating inspection and servicing requirements, where applicable, for all domestic properties, communal blocks and 'other' property assets.
- 8.2 Connexus will hold accurate inspection dates and inspection records against each property it owns or manages electronically.
- 8.3 Connexus will ensure the Gas Safe registered engineer records the details of all appliances and other equipment which is served by the gas/heating supply in every domestic property, communal block or 'other' property, onto the inspection certificate.
- 8.4 Connexus will establish and maintain accurate records of all completed safety records, warning notices and associated remedial works and keep these for a period of not less than two years.
- 8.5 Connexus will hold and maintain accurate records on the qualifications of all engineers undertaking gas/heating works for the organisation.
- 8.6 Connexus will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all gas/heating safety related data.

9. Key Roles and Responsibilities

- 9.1 Connexus Board will have overall governance responsibility for ensuring the Gas and Heating Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. SMT will formally approve this policy and review it every two years (or sooner if there is a change in regulation, legislation or codes of practice).
- 9.2 The Board and SMT will receive regular updates on the implementation of the Gas and Heating Policy and gas safety performance, along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.
- 9.3 The SMT will receive reports in respect of gas safety performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 9.4 The Director of Property has strategic responsibility for the management of gas safety and ensuring compliance is achieved and maintained. The Head of Building Safety and Compliance will oversee the implementation of the Gas Safety Policy.
- 9.5 The Compliance Manager will be responsible for overseeing the delivery of the agreed gas safety programme. They will also prioritise and implement any works arising from the gas safety inspections. They will ensure Connexus delivers the programme in accordance with this policy.

- 9.6 The housing teams will provide key support in gaining access into properties where access is proving difficult and use standards methods to do so. They will also facilitate the legal process to gain access as necessary.
- 9.7 The Director of Property will be responsible for ensuring the policy is reviewed every two years, and will notify the Board, SMT and operational team responsible for the delivery of the compliance programme, of the upcoming review. The Director of Property will ensure that this review process takes place before the policy expires in April 2024.
- 9.8 The Director of Property will ensure that this policy is saved on the organisation's shared drive and distributed to all relevant members of staff.

10. Competent Persons

- 10.1 Connexus will ensure that the manager with lead responsibility for operational delivery is appropriately qualified, holding a recognised gas safety management qualification. They should have or be working towards gaining the Level 4 VRQ in Gas Safety Management (if they are not Gas Safe Registered), or equivalent, and full membership of the Association of Gas Safety Managers (AGSM). If they do not have these already, they should obtain them within 12 months of the approval of this policy.
- 10.2 Connexus will ensure that all operatives (internal or employed by external contractors) maintain Gas Safe accreditation for all areas of gas/LPG works that they undertake.
- 10.3 Connexus will ensure that only suitably competent Gas Safe accredited contractors are procured and appointed to undertake works to gas/LPG fittings, appliances and flues.
- 10.4 Connexus will ensure that all operatives, where appropriate, are on the Accreditation Certification Scheme (ACS).
- 10.5 Connexus will ensure that, where applicable, only suitably competent Oil Firing Technical Association (OFTEC) and/or HETAS accredited contractors are procured and appointed to undertake works to oil fired and solid fuel fittings, appliances and flues. HETAS is a not-for-profit organisation offering competent person scheme for installers of biomass and solid fuel heating, registration for retailers and chimney sweeps and approval of appliances and fuels.
- 10.6 Other heating types – Connexus will ensure that, where applicable, only individuals/organisations with a Microgeneration Certification Scheme accreditation (MCS) are procured and appointed to undertake works on ground air source heat pumps, solar thermal and biomass heating systems.
- 10.7 The operational team with responsibility for delivery will check the relevant qualifications of in-house operatives or employees working for external contractors to ensure that all persons are appropriately qualified and accredited for the work that they are carrying out. These checks will be undertaken on an annual basis and evidenced appropriately.

11. Training

- 11.1 Connexus will ensure that all operatives working for, or on behalf of, the organisation have the relevant training required for their role. This will be managed via periodic assessments of training needs and resulting programmes of internal and/or external training.

12. Performance Reporting

- 12.1 Robust key performance indicator (KPI) measures will be established and maintained to ensure Connexus is able to report on performance in relation to gas/heating safety.
- 12.2 KPI measures will be produced and provided at SMT level on a monthly basis and Board level on a quarterly basis. As a minimum, these KPI measures will include reporting on:

Data – the total number of:

- Properties – split by domestic properties, communal blocks and other properties.
- Properties on the gas/heating servicing programme.
- Properties not on the gas/heating servicing programme.
- Properties with a valid ‘in date’ LGSR/certification. This is the level of compliance.
- Properties where the LGSR/certification has expired and is ‘out of date’. This is the level of non-compliance.
- Properties which are due to be serviced within the next 30 days. This is the early warning system.

Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Anticipated impact of corrective action.
- Progress with completion of follow-up works – number of actions – ‘completed’, ‘in time’ and ‘overdue’.

13. Quality Assurance

- 13.1 Connexus will carry out independent third-party quality assurance audits of gas, oil and solid fuel safety appliances. This will be risk-based field audit check on all servicing and an annual ‘in progress’ check of engineers in the field. In addition, 100% of all certification will have a desktop check completed by the compliance team.
- 13.2 Connexus will carry out an independent audit of gas/heating safety at least once every two years. This audit will specifically test for compliance with the regulation,

legislation and approved codes of practice and identify any non-compliance issues for correction.

14. Non-Compliance / Escalation Process

- 14.1 Any non-compliance issue identified at an operational level will be formally reported to the Director of Property in the first instance.
- 14.2 The Director of Property will agree an appropriate course of corrective action with the operational team in order to address the non-compliance issue and report details of the same to SMT.
- 14.3 SMT will ensure the Board is made aware of any non-compliance issue so they can consider the implications and take action as appropriate.
- 14.4 In cases of a serious non-compliance issue SMT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation, or any other relevant organisation such as the HSE, as part of the Regulatory Framework.

15. Glossary

- 14.1 This glossary defines the key terms used throughout this gas and heating policy:
 - Gas Safe Register: the official list of gas engineers who are qualified to work legally on gas appliances.
 - LGSR: Landlords Gas Safety Record – a certificate containing the results of the annual safety check carried out on gas appliances and flues.