

## STATEMENT OF INTENT

This policy relates to all Saffron Group owned properties with the exception of shared ownership properties.

### 1. PURPOSE OF THE POLICY

- 1.1 The purpose of the policy is to set out the roles and responsibilities with Saffron Group and its managing agents for the achievement of gas and heating safety, and adherence to statutory responsibilities and best practice.
- 1.2 Delivery of this service will be in conjunction with Saffron Group's Heating Safety Risk Assessment and Servicing Procedures.

### 2. ELEMENTS OF THE POLICY

The key objectives of the Gas Management Policy are:

- To ensure that heating appliances and fittings provided by Saffron Group are properly maintained, so that they remain in a safe, effective, and efficient condition.
- To ensure that Saffron Group meets all the statutory and regulatory obligations in respect of gas, and heating safety and maintenance.
- To maintain the quality and good condition of Saffron Group housing stock in respect of all Saffron Group owned heating appliances and fittings.
- To ensure that an annual heating safety check and service is carried on all heating appliances and fittings where Saffron Group are responsible for their maintenance.
- Each year around 20 people die through carbon monoxide poisoning in the United Kingdom. This policy is designed to ensure Saffron Group takes all reasonably practicable steps to avoid, minimise and manage risks to its tenants.

### 3. DEFINITIONS COVERED BY THIS POLICY

- 3.1 Definitions of the work covered by the Gas Management are not exclusive to gas appliances, and include properties with Solid Fuel, Oil, Renewable and Unvented appliances owned by Saffron Group
  - Within this Policy the term "gas appliances and fittings" is intended to refer to any gas appliance, flue, or installation pipework.
  - Within this Policy the term "heating servicing" or "heating safety check" is intended to refer to the annual safety inspection and servicing of any gas, oil, renewable,

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unvented hot water, or solid fuel burning appliances and fittings that Saffron Group has provided and are responsible for.

- Within this Policy the term “heating appliances” is intended to refer to any gas, oil, renewable, unvented hot water cylinder or solid fuel appliance and fittings that Saffron Group has provided and are responsible for.
- Landlords Gas Safety Record is the completed safety record.

## 4. LEGAL REQUIREMENTS

Saffron Group has legal obligations to ensure the safety of tenants, visitors, Saffron employees and members of the public for gas safety under several statutes and regulations, including:

- Gas Safety (Installation and Use) Regulations 1998, including amendments.
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1998
- Building Regulations 2010 (Including 2023 amendments)
- Landlord and Tenants Act 1985

- 4.1 Regulation 36 of the Gas Safety (Installation and Use) Regulations 1998 (GSIUR) requires landlords to ensure that all gas appliances and fittings (including gas installation pipework and flues) provided by the landlord are maintained in a safe condition.
- 4.2 Regulation 36 also requires landlords to carry out a safety check on gas appliances and fittings in all properties at least once in every 12-month period.
- 4.3 Where it has not been possible to carry out a gas safety check within the prescribed period because access has not been provided, landlords are required to demonstrate that all reasonable steps to secure access have been taken.
- 4.4 Regulation 36 requires that, once a safety check has been completed, landlords provide their tenants with a copy of the landlord’s gas safety record (Landlord’s Safety Certificate or LSR) confirming this within 28 days of the safety check being carried out.
- 4.5 Regulation 36 requires that new tenants be provided with a LSR in relation to the most recent gas safety check prior to taking up occupation. The gas safety check must have been carried out within 12 months of the new tenancy commencing.
- 4.6 Landlords are required to keep records for at least 2 years of all gas safety checks carried out and for these to be available for inspection by tenants and other interested parties. A Scanned Images and Documents procedure is included in Saffron Housing Trust’s Heating Safety and Servicing Procedure. An IT electronic Document back up procedure is included in Saffron Housing Trust’s Heating Safety and Servicing Procedure.

- 4.7 Regulation 3 of the GSIUR (Gas Safety Installation and Use regulations) requires that only competent persons (currently Gas Safe Register accredited gas engineers) shall carry out gas safety checks, repairs, installations, and other relevant works.
- 4.8 Regulation 30 of the GSIUR requires that gas fires, gas space heaters or gas water heaters are not installed in a room intended to be used as a bathroom or shower, or for sleeping accommodation, unless it is room sealed. \*1
- 4.9 The Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 require employers to carry out a risk assessment including in relation gas safety checks and servicing as they relate to employees, tenants, and other affected individuals.  
Risk assessment procedure is included in Saffron Housing Trust's Heating Safety and Servicing Procedure.
- 4.10 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) require employers, the self-employed and people in control of premises to report:
- deaths
  - major injuries
  - over-3-day injuries – where an employee or self-employed person is away from work or unable to perform their normal work duties for more than 3 consecutive days.
  - injuries to members of the public or people not at work where they are taken from the scene of an accident to hospital.
  - some work-related diseases
  - dangerous occurrences – where something happens that does not result in an injury but could have done.
  - Gas Safe registered gas fitters must also report dangerous gas appliances and fittings they find, and gas conveyors/suppliers must report some flammable gas incidents.
  - death or major injury arising out of carbon monoxide poisoning.
1. Section 11 of the Landlord and Tenant Act 1985 requires landlords to “keep in repair and proper working order” installations for the supply of gas and installations for space heating and heating water in its rented accommodation.

## 5. SAFFRON GAS PROCEDURE DOCUMENTS

The following list of procedures are to be used to support the Gas Management Policy:

- Section 01 – Gas Management Procedure
- Section 02 – Risk Assessment Procedure
- Section 03 – Gas Industry Unsafe Situations Procedure
- Section 04 – Gas Escape Procedure

- Section 05 – Audit Procedure
- Section 06 – Open Flue Procedure
- Section 07 – Properties outside Service Programme
- Section 08 – Tightness testing Commercial Low pressure Gas Procedure
- Section 09 – Ventilation Check Procedure
- Section 10 – Flue Check Procedure
- Section 11 – Working on Gas Appliances Procedure
- Section 12 – Operative Recruitment Procedure
- Section 13 – Void and Mutual Exchanges Procedure
- Section 14 – Alterations to Property Procedure
- Section 15 – Tightness Testing Domestic Procedure
- Section 16 – Carbon Monoxide Procedure
- Section 17 – Access Procedure
- Section 18 – Conducting Work Inside Residential Properties during COVID

## **6. CUSTOMER CARE AND RESIDENT INVOLVEMENT**

6.1 This policy is intended to reflect Saffron Group approach to customer care and resident involvement including:

- Consultation with tenants about the contents of this policy
- Building in high standards of care within the policy
- Developing with tenants, service standards associated with this policy.
- Include tenant feedback measures within the quality assurance and performance management arrangements described in this policy.

6.2 This policy also include measures Saffron Group will take to ensure that the needs of older and vulnerable tenants are met, including those living in sheltered, or other shared accommodation.

6.3 This policy also recognises the needs of diverse communities and reflects Saffron Groups policy on equality and diversity.

## **7. SCOPE OF SAFETY CHECKS AND SERVICING**

7.1. This policy applies to all properties and heating appliances where Saffron Housing Trust has a legal, regulatory, or best practice duty to maintain heating appliances and fittings. This includes:

- all properties owned and/or managed by Saffron Housing Trust where gas is provided.
- all heating appliances and fittings provided by Saffron Housing Trust as the landlord.
- all heating appliances and fittings provided by former tenants where these have been left in place following re-letting.

- all heating appliances and fittings provided by current tenant's that Saffron Housing Trust have agreed (in writing) to adopt.
- heating appliances and fittings, including communal boilers, provided by Saffron Housing Trust in sheltered accommodation, hostels, other shared accommodation or within shared heating schemes.
- heating appliances and fittings provided in shared ownership/leased accommodation may be included.

- 7.2 Saffron Housing Trust also has a responsibility in respect of any portable gas appliances and flues including liquid petroleum gas (LPG) appliances it has provided. However, Saffron Housing Trust does not generally provide such appliances and its tenancy conditions exclude the use of LPG appliances in tenants homes where the safety and layout of the home do not allow for the suitable storage of bottled gas appliances.
- 7.3 Although Saffron Housing Trust does not have a legal duty in respect of leasehold properties where the lease is for seven years or more, this policy includes provisions for leaseholders to ensure the health and safety of its leaseholders and neighbouring residents.
- 7.4 This policy applies to shared ownership properties and/or tenancies that are sub-let where appropriate.
- 7.5 All flues within properties are included within this policy. Flue Checks procedure is included in Saffron Housing Trust's Heating Safety and Servicing Procedure.
- 7.6 This policy does not relate to electric storage heaters, or other forms of heating provided in Saffron Housing Trust homes not specifically referenced in section 3.1.
- 7.7 Whilst Saffron Housing Trust does not have a legal obligation under the GSIUR to maintain gas appliances and fittings it has not provided; this policy includes a visual only check of tenants' own gas appliances and fittings that it has chosen not to adopt but does not include servicing or other maintenance.
- 7.8 Whilst there is currently no specific legal or statutory obligation for landlords relating to the annual servicing of oil, air source/unvented cylinders or solid fuel burning appliances, there is a clear expectation by the HSE and the RSH that landlords will adhere to best practice and industry standards to ensure the welfare of its tenants, and its adherence to good health and safety practices.

## **7.9 Safety check and servicing frequency**

- 7.9.1 It is intended that each property with a heating appliance where Saffron Housing Trust is responsible for maintenance will receive a heating safety check and service within 12 months of the previous check and service.

- 7.9.2 Where a property is re-let, a gas safety check will be carried out prior to the gas installation, or appliances being reconnected when the new customer takes up occupation. A full gas safety check will be carried out at the point of gas-reinstatement. The re-let property will then be included in the gas safety check and servicing programme with the next safety check due to take place within 12 months of the safety check carried out at the time of re-let/re-instatement.

For newly installed gas heating or heating appliances, a heating safety check and service will be carried out within 12 months of installation or less if required by the manufacturer's instructions.

## **8. HEATING SAFETY CHECK AND SERVICE CONTENT**

- 8.1 The heating engineer (either Saffron directly employed or external contractor) will carry out heating safety checks and servicing in line with:
- the manufacturer's instructions for each heating fitting
  - the GSIUR and the HSE Approved Code of Practice\*3
  - Gas Safe Register Guidance and any other relevant governing body guidance (such as HETAS and OFTEC)
- 8.2 In all cases, heating safety checks and servicing will be carried out by heating engineers who have a current Gas Safe Register accreditation, or an accreditation appropriate to the heating appliance being checked and serviced and are qualified to a recognised industry standard for each relevant appliance type. Saffron Group holds an up-to-date matrix of all qualifications of engineers including external contractors.

## **9. IMPLEMENTING THE HEATING SAFETY CHECK PROGRAMME**

- 9.1 Saffron Group recognises that, to fulfil its obligations in providing heating safety checks, it is crucial to enlist the support of tenants in providing access to heating engineers. It will achieve this by promoting the safe use of heating appliances including the need for an annual heating safety check, by providing clear notification of the need for access accompanied by an appointment date, and using legal remedies to secure access as a last resort where access has been denied.

Programme implementation and access procedures are included within the Heating Safety Risk Assessment and Servicing Procedure this includes an access procedure from housing management.

## **10. TENANTS APPLIANCES, INSTALLATIONS AND CARBON MONOXIDE (CO) ALARMS**

- 10.1 In the interest of the health and safety of Saffron Group tenants, a visual safety check, excluding servicing, will be offered to Tenants for their own gas cooking appliances and fittings.

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- Tightness Testing part 1-2 procedure is included in Saffron Group Heating Safety and Servicing Procedure.
- 10.2 The appropriately qualified heating engineer will identify all heating fittings belonging to the tenant and record these on the LSR record.
- 10.3 A tenants' heating appliances and fittings procedure has been included within the Heating Safety and Servicing Procedure.
- 10.4 Under current regulations there is now a legal requirement for CO alarms to be fitted. Saffron Group specifications for electrical rewires/inspection and new heating installations and boiler upgrades have been amended to include the provision of a CO alarm. This managed approach will ensure all Saffron Group properties will have a CO alarm installed.
- 10.5 Saffron Group will carry out an inspection of installed CO alarms whilst carrying out the annual appliance inspection and service, recording the date installed, make and location on the LSR record. The alarm will be changed at the time of the inspection if the replacement due date is within one year of the inspection.

## **11. VOIDS, NEW TENANCIES AND MUTUAL EXCHANGES**

- 11.1 Saffron Group will cap off the gas supply in all void properties. Upon re-letting, the gas supply will be reconnected upon completion of all void repairs/upgrades, and a gas safety check and servicing carried out.
- 11.2 A gas safety check will be carried out in those properties where a mutual exchange is taking place.
- 11.3 All new tenants, including those in mutual exchanges, will be provided with a Landlord Safety Record (LSR) record at sign up.

## **12. HEATING QUALIFICATIONS**

- 12.1 In accordance with Section 3 of the GSIUR, all persons carrying out gas safety checks, servicing, repairs, installations and other relevant works on behalf of Saffron Group are required to have a current Gas Safe Register accreditation with appropriate ACS accreditation and be competent in safe gas installation work which requires engineers to have enough knowledge, practical skill and experience to carry out the job in hand safely, with due regard to good working practice. Competence must be kept up to date, e.g. through awareness of changes in law, technology, and safe working practice.
- 12.2 All heating engineer's working within this policy, carrying out servicing, repairs, installations, and other relevant works on behalf of Saffron Group will hold the appropriate industry qualifications and accreditations. This is managed via a skills matrix.

## **13. QUALITY ASSURANCE**

- 13.1 Demonstrating good quality in heating safety checks and servicing is essential to securing the health and safety of Saffron Group tenants. With reference to the best practice for gas safety identified by the Audit Commission, Saffron Group has in place a quality assurance regime through in-house and independent third-party assessors.

## **14. PERFORMANCE MANAGEMENT AND WORKS/CONTRACTOR SUPERVISION**

- 14.1 Saffron Group will manage performance and supervise its in-house heating servicing element and any external heating contractors via a suite of agreed key performance indicators (KPI's) and other management information.
- 14.2 Compliance with the regulations will be reported each quarter as part of the compliance report to Saffron Group Board.
- 14.3 More detailed KPI's and management information relevant to the performance of the in-house heating servicing and external heating contractors will be reported monthly to the Saffron Asset Management team and at any contract liaison meetings.
- 14.4 Wherever appropriate, performance targets will be agreed and monitored. These will be reviewed and revised each year to ensure continuous improvement.
- 14.5 Benchmarking will be used wherever benchmarking information is available to help ensure that Saffron Group performance reflects upper quartile performance demonstrated by other comparable providers.

## **15. METHODS FOR CONTINUOUS IMPROVEMENT**

- 15.1 In order to ensure we continually improve our service we will regularly ask for feedback from our tenants and stakeholders. In addition, we will seek best practice and ensure we keep up to date with current legislation.
- 15.2 Performance against budget and target timescales will be reported to the Senior Leadership Team and Saffron Group's Customer Voice on an agreed basis.

## **16. SERVICE STANDARDS**

- 16.1 Service standards for heating servicing have been agreed with tenants and can be found in the Repairs and Maintenance Policy Handbook.



## **17. COMPLAINTS**

- 17.1 Any complaints about this policy or its implementation will be addressed through the Saffron Group complaints procedure. Complaints may be made by telephone to the Saffron Group Customer Contact Team or online at <http://www.saffronhousing.co.uk/residents/help-and-advice/complaint-comments-compliments/>
- 17.2 Complaints made in person, by letter or by email will be directed into the corporate procedure.

## **18. RESPONSIBILITY**

In relation to gas safety management, the principal responsibilities are held by:

### **18.1 Chief Executive**

The Chief Executive has overall responsibility for overseeing of all aspects of heating safety within Saffron Group. This includes the provision of adequate financial and human resources to ensure, as far as is reasonably practical, that heating systems are installed and maintained in compliance with Health and Safety at Work Act 1974, Gas Safety (Installation and Use) Regulations 1998, Management of Health and Safety at Work Regulations 1999, Gas Safety (Management) Regulations 1996, Building Regulations 2010, Landlord and Tenant Act 1985. This also includes any relevant governing body guidance such as HETAS and OFTEC.

### **18.2 The Chief Operating Officer**

The Chief Operating Officer is responsible for ensuring the implementation and that adequate resources are made available to enable the objectives of this policy are to be met. This will include that heating systems are installed and maintained in compliance with Health and Safety at Work Act 1974, Gas Safety (Installation and Use) Regulations 1998, Management of Health and Safety at Work Regulations 1999, Gas Safety (Management) Regulations 1996, Building Regulations 2010, Landlord and Tenant Act 1985.

The Chief Operating Officer will identify specific responsibilities to the Assistant Director of Operational Delivery, The Assistant Director of Housing Management, and the Development Team.

### **18.3 Director of Asset, Sustainability & Decarbonisation**

The Director of Asset, Sustainability & Decarbonisation is responsible for the operational delivery of this policy and the associated procedures. This includes responsibility for

monitoring and review, staff awareness and training, policy development and communication to tenants.

The Director of Safety & Repairs will oversee the day-to-day management of all contracts and in-house staff relating to heating installations upgrades, servicing, gas safety inspections, heating repairs and all associated gas and heating contractors.

## **18.4 The Director of Housing Management**

The Director for Housing Management will identify specific responsibilities to the housing teams to manage heating safety where there are access issues, or where a breach of tenancy has occurred, in accordance with the agreed procedures and No Access policy. They will ensure that all breaches of tenancy are followed up in accordance with the terms of the tenancy agreement, and the agreed procedures and policies in place. They will ensure that all set policies and procedures, including any legal actions, are followed in accordance with the relevant schedules. They will ensure that all information is distributed back to the Heating Team in accordance with any agreed policies and procedures.

## **18.5 Planned Improvements Manager**

The Planned Improvements Manager will be responsible for ensuring that all new heating installations and servicing and safety inspections of commercial heating types are designed to comply with all current legislation and mandatory guidance. They will also ensure that there is compliance with gas safety regulations in all work that may have an impact on gas safety maintenance contracts. They will be responsible for providing the services of appropriately qualified staff and engineers to carry out the implementation of the heating, installation contract, in accordance with good practice and current legislation.

They will ensure that contractual arrangements made with contractors to carry out heating installations servicing of commercial heating types, safety inspections and maintenance comply with current legislation.

They will be responsible for providing the services of appropriately qualified third-party contractors to carry out quality monitoring of the work of the contractors appointed to implement the gas/heating installation servicing and safety inspections.

They will ensure attendance at regular meetings with the contractor, ensuring that the Saffron Housing Trust policies and procedures are being adhered to in accordance with current legislation.

## **18.6 Director of Development**

The Director of Development will be responsible for ensuring that all new build gas installations and other heating types are designed to comply with all current legislation

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and mandatory guidance. They will also ensure that there is compliance with gas safety regulations in all work that may have an impact on gas safety maintenance contracts.

They will ensure that all relevant documents relating to new build installation will be passed to the Heating Manager on completion of new build and in a timely manner.

They will ensure any changes to relevant legislation or good practice changes that may affect the gas policies or procedures are passed to the contractor working on the new builds.

They will ensure that these changes are conveyed to the gas and heating contractors and understood by the contractors.

They will ensure that contractual arrangements made with contractors to carry out gas installations on new builds comply with current legislation.

## 18.7 Heating Manager

The Heating Manager will ensure that any risk in respect of heating safety is identified, prior to the execution of any repair or maintenance operation. They will be responsible for providing the services of appropriately qualified staff and engineers to carry out the implementation of the heating, servicing, safety inspection and repair contract, in accordance with good practice and current legislation.

They will ensure that all persons carrying out work on Saffron Group heating appliances, installations and fittings are competent, qualified, and registered with the Gas Safe Register, OFTEC and any other relevant regulators and that this registration is kept up to date.

They will carry out regular toolbox talks and ensure that frequent quality monitoring and training reviews/appraisals are carried out.

They will ensure that all records to be maintained by Saffron Group and the contractor are maintained appropriately and are current and accurate.

They will ensure that they are following any agreed policies and procedures in relation to gas safety and gas safety management, and that these policies and procedures, and any changes to agreed policies and procedures are conveyed to all contractors and in house staff. The Heating Manager will be responsible for the day-to-day management of all contracts relating to heating gas servicing, gas safety inspections, gas repairs and all associated gas and heating contractors.

They will ensure that resources are made available to provide training to staff to enable them to fulfil their duties in relation to gas safety and other heating types.

They will ensure that the contractors and in-house staff for heating installations, gas servicing, repairs and maintenance, gas safety inspections and any other gas related

work follow good practice to ensure each property is safely maintained and that a safety check is carried out at least every 12 months, and that there is compliance with the Gas Safety (Installation and Use) Regulations 1998. They will carry out regular quality monitoring of gas safety inspections and gas, oil, solid fuel and ASHP heating repairs.

## 19. DATA PROTECTION

At all times staff will adhere to all Data Protection policies and procedures.

## 20. POLICY APPEALS

Any appeals or complaints received relating to this policy will be dealt with under Saffron Group's Complaints Policy.

## 21. MONITORING

To monitor the quality of the overall service, Saffron Group will request all tenants to complete a feedback survey. Feedback on performance will be against targets and budget and reported to the Senior Leadership Team.

## 22. REVIEW PERIOD

The Gas Management Policy will be reviewed every 2 years to ensure it meets current legislation and reflects best practice. Minor amendments to this policy will be subject to the approval of the Director of Sustainability.

<b>Consulted with Tenant Panel</b>	
<b>Exec/Board/Committee</b>	
<b>Date Approved</b>	10/06/2024
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<b>Officer</b>	Heating Manager
<b>Version Number</b>	4.0