



Places to live. Space to grow.

Gas and Heating Safety Policy

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1 Introduction: the purpose of this policy

- 1.1 This policy sets out our legal and regulatory obligations and how we will meet them. This policy applies to all our staff, residents, contractors, and other people who may work on, occupy, visit, or use our premises or who may be affected by our activities or services.
- 1.2 We must ensure that gas installations and other heating installations are safe when a tenancy begins and are maintained in a safe condition throughout the tenancy.
- 1.3 We will ensure that gas fittings and flues are maintained in a safe condition, and gas appliances will be serviced in accordance with the manufacturer's instructions. We will conduct annual gas safety checks on each gas appliance and flue within 12 months of the previous check.

2 Policy Statement

- 2.1 At West Kent, we are committed to keeping everyone safe. This policy explains our legal and regulatory responsibilities and how we manage and reduce risk. It applies to all staff, residents, contractors and anyone who works in, visits or is affected by our buildings or services.

3 Safety Checks

- 3.1 We will ensure gas fittings and flues are maintained in a safe condition, and gas appliances will be serviced in accordance with the manufacturer's instructions. This will be for all Domestic, communal and commercial buildings owned by West Kent.
- 3.2 Ensure an annual safety check is carried out on each gas appliance and flue; this also includes active gas standpipes. MOT-style gas servicing allows engineers to visit a property any time between 10 and 12 months after the last annual gas safety check, while still retaining the original service date.
- 3.3 Conduct an annual safety check and sweep on all solid fuel appliances/heating types to industry standards.
- 3.4 Conduct an annual safety check on all other forms of heating except for electrical storage heaters, which are covered through the Electrical Safety Inspection programme.
- 3.5 We will ensure all gas and other heating safety checks are carried out before the start of a new tenancy, including mutual exchanges and transfers.
- 3.6 Ensure all installation, maintenance, and safety checks are carried out by a registered Gas Safe engineer.
- 3.7 We will supply the existing tenants a copy of the Landlord Gas Safety Record (LGSR) within 28 days of the check being completed and give new tenants a copy before they move in.

- 3.8 Display a copy of the latest safety check in a common area of a building where applicable.
- 3.9 Ensure no gas fitting would contravene any gas regulations.
- 3.10 We will conduct a gas safety check following the installation of a new gas appliance; the check will include a tightness test.
- 3.11 We will carry out a nine-point visual check of the tenant's own appliances, provided there is evidence it has been installed by a Gas Safe Engineer. If no evidence is available, we will cap the appliance until it can be deemed safe.
- 3.12 We will check that smoke and carbon monoxide (CO) alarms are present and operational as part of the gas safety check. Battery-powered detectors will be provided and installed if no detectors are present.
- 3.13 Risk assessments for gas safety management will be established and maintained. The risk assessment will set out our key gas safety risks with appropriate mitigations and be monitored by Senior Management with the iNHomes Team.
- 3.14 We will hold records of a valid Landlord Gas Safety Record (LGSR) or heating inspection record where we do not own or do not have the responsibility for the safety check, and this is conducted by a third party. If a valid record is not provided, we may conduct the check and recharge for the cost.

4 Gas Capping and No Access

- 4.1 We will cap the gas after a period of no more than three months on all vacant properties until they become occupied. Gas will only be reconnected once a valid safety check has been completed.
- 4.2 We will cap the gas on occupied properties if we are unable to gain access to carry out a safety check by its legal due date.
- 4.3 We will follow our no-access process where required to ensure we gain access to homes and ensure we start to gain access early enough to ensure 12-month compliance.
- 4.4 We will contact tenants who have had their gas capped as per our capped gas process, which is a case within our Housing Management System.
- 4.5 Any open flue gas appliances found in rooms being used as bedrooms will be capped and made safe.

5 Incidents

- 5.1 We will act on any gas incident, including Carbon Monoxide poisoning incidents, and follow our Health and Safety Incident reporting procedure. All Gas incidents will be led by the iNHomes Planners for stage 1, stage 2 will then be escalated to our independent 3rd Party consultants and managed with our Compliance Co-ordinator. Reporting to any relevant enforcing authority will be undertaken as part of the procedure by our Head of Facilities and Health and Safety.

6 Resident Requests

- 6.1 Where there is a tenant request to carry out an alteration or improvement which affects the gas appliances or installation permission must be sought.

7 Roles and Responsibilities

- 7.1 West Kent is the duty holder and responsible person for Gas Safety.
- 7.2 West Kent's Board has overall governance responsibility for ensuring the Gas Safety Policy is fully implemented to ensure full compliance with regulatory standards, legislation and Approved Codes of Practice.
- 7.3 The Executive Team (ET) and Communities and Housing (C&H) will receive compliance dashboard reports in respect of gas safety testing and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified and decide on action needed, plus all follow-on action monitoring.
- 7.4 The Director of Property and Asset Management has strategic responsibility for the management of Gas Safety.
- 7.5 The Head of Strategic Asset Management will report on compliance and ensure Gas safety data is kept up to date within the systems.
- 7.6 The Head of Repairs will be responsible for overseeing the delivery of the Gas Safety Inspection programme, any remedial works required and all maintenance to gas installations.
- 7.7 The iNHomes Operations Manager will ensure all compliance for Gas Safety is upheld and manage the programme with all remedial works. They will be qualified or be seeking qualifications in CCN1 Domestic Gas Safety. They will ensure all engineers are Gas Safe and hold the necessary qualifications.
- 7.8 The Compliance Co-Ordinator will administer the contract for 3rd party quality control on Gas Safety inspections, escalating any issues found.
- 7.9 Housing teams and the Community Safety Team will provide support with difficult-to-access properties and facilitate the legal process.
- 7.10 Appendix 1 details all roles and responsibilities along with our 3 lines of defence across all compliance areas.

8 Record Keeping

- 8.1 We will hold accurate records against each asset we own or manage to identify control records stating if gas servicing is needed for that asset. This will be stored in our Housing Management System.

- 8.2 We will hold accurate records against each asset of when the gas safety inspection was last carried out. These will be stored in our Housing Management System.
- 8.3 This system will track and monitor any non-compliance in terms of the date being older than its next due annual inspection.
- 8.4 We will record details of all heating appliances with installation dates, make, and models for all assets.
- 8.5 The LGSR will be held on our document management system against the relevant asset.
- 8.6 The iNHomes Operations Manager will ensure that all subcontractors' employees and public liability insurances are up to date on an annual basis and maintain a record of this. They will also hold and maintain accurate records on the qualifications of all engineers undertaking gas and heating works and retain these for a minimum of two years.
- 8.7 Keep a record of each safety check for at least two years.
- 8.8 No access cases will be recorded on our Housing Management System along with all appointments, communication and action taken.

9 Regulation

- 9.1 Regulatory standards must be complied with; these include the requirements of the Regulator of Social Housing (RSH). Safety and Quality Standards and Tenant Satisfaction Measure requirements are needed for Gas Safety Inspections. The measure will be based on the proportion of homes in buildings that have had all the necessary Gas Safety Inspections carried out.
- 9.2 The principal legislation applicable to this policy:
- The Gas Safety (Installation and Use) Regulations 1998 as amended
 - The Gas Safety (Management) Regulations 1996, as amended
- 9.3 This policy also operates in the context of additional legislation as follows:
- The Social Housing (Regulation) Act 2023
 - Health and Safety at Work Act 1974
 - The Management of Health and Safety at Work Regulations 1999
 - The Housing Act 2004
 - Landlord and Tenant Act 1985
 - Homes (Fitness for Human Habitation) Act 2018
 - The Workplace (Health, Safety and Welfare) Regulations 1992

- The Building Regulations 2010
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- Pressure Equipment (Safety) Regulations 2016 – where applicable
- Pipelines Safety Regulations 1996
- Heat Network (Metering and Billing) Regulations 2014
- Energy Act 2023
- The Heat Networks (Market Framework) (Great Britain) Regulations 2025
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

9.4 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)
- Decent Homes Standard including HHSRS Operating Guidance - Housing Act 2004
- The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 as amended by the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022.

10 Reporting

10.1 Performance reporting will take place monthly in our compliance dashboard, generated from our housing management system, which monitors all compliance. This system holds the control records for each asset and where a Gas Safety Inspection is required. A property that has not had its Gas Safety Inspection annually will become non-compliant. This will be relevant to the Tenant Satisfaction Measure of BS01, which measures the

proportion of homes for which all required gas safety checks have been carried out and recorded.

- 10.2 This dashboard and any non-compliance will be discussed by ET monthly and Communities and Housing (C&H) and board quarterly. Non-compliance escalation will then be taken forward from these groups by the Head of Strategic Asset Management to ensure action is taken so that compliance is then assured.
- 10.3 Any incident such as a Carbon Monoxide incident, which has resulted in a potential breach of legislation or regulatory standard or causes a risk to health or safety shall be immediately reported to the Property and Asset Management Director as per the Health and Safety incident reporting procedure.
- 10.4 Where necessary, the board will be notified so they can consider the implications and seek legal advice on a breach. If required, West Kent will disclose the breach to the Regulator of Social Housing in the spirit of co-regulation, or any other relevant organisation such as the Health and Safety Executive (HSE), as part of the Regulatory Framework.

11 Consultation

- 11.1 The changes made to the compliance policies in this review have been sent to both OMT, the Health and Safety Committee, and the Executive Team.
- 11.2 The compliance policies were consulted with our resident scrutiny panel in 2024. In this review, there have been minimal changes made; therefore, they have not been sent to the panel again for further review.

12 Communication

- 12.1 West Kent considers good communication and liaising with relevant parties essential. As such, we will:
- Share information clearly and transparently with residents
 - Share the LGSR as item 2.7.

13 Review

- 13.1 This Policy will be reviewed every two years or when there is a regulation/legislation change requiring it to be updated.