



Gas Safety, Heating and Hot Water Compliance Policy





1.0 Introduction

- 1.1 This policy outlines Housing Plus Group's (HPG) 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 HPG is committed to keeping residents, staff, contractors and visitors safe by managing gas, heating and hot water (HHW) systems in line with legislative, regulatory obligations and recognised standards. This policy sets our principles. Operational detail sits in the Heating & Gas Procedure Manual.
- 2.2 To achieve our objectives, HPG will:
- 2.2.1 Maintain accurate compliance records for HHW systems and apply legally required inspection, maintenance and actions across all property types.
 - 2.2.2 Undertake inspections, servicing and repairs in line with legal requirements and recognised industry guidance.
 - 2.2.3 Respond promptly to gas incidents and meet all RIDDOR reporting duties.
 - 2.2.4 Ensure inspection and servicing intervals meet all statutory requirements, including annual domestic checks and any additional frequencies set out in legislation and standards.
 - 2.2.5 Complete pre-occupation safety checks in accordance with legal duties
 - 2.2.6 Provide safety records to residents in line with statutory timescales.
 - 2.2.7 Ensure only competent, appropriately registered engineers undertake gas work (e.g., Gas Safe for gas; OFTEC/HETAS/MCS for other systems).
 - 2.2.8 Apply the Gas Industry Unsafe Situations Procedure (GIUSP) and make safe immediately where risk is identified.
 - 2.2.9 Adhere to recognised standards for oil, solid fuel and renewables (e.g., OFTEC, HETAS, MCS).
 - 2.2.10 Ensure that unsafe installations remain isolated until they are verified safe
 - 2.2.11 Require all personnel, internal and contracted, to be competent and appropriately trained for the work they undertake.
 - 2.2.12 Take all reasonable steps to gain access for safety checks, using legal routes where necessary.
 - 2.2.13 Undertake risk-based internal and independent assurance to drive continuous improvement.
 - 2.2.14 Prohibit works that could compromise gas safety (e.g., obstructing flues) unless appropriate checks and controls are in place in accordance with Regulation 8 of GSIUR.



3.0 Policy Scope

- 3.1 This policy applies to all homes, buildings and premises owned or managed by HPG, including general needs, supported housing, leasehold, shared ownership and operational premises. Detailed property classifications are maintained in the Heating & Gas Procedure Manual.
- 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.
- 3.3 This policy should be read alongside other Group safety and building compliance policies including Damp and Mould (Awaab's Law), Water Hygiene, Electrical Safety, Fire Safety and Building Safety.

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.
- 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):** Device detecting and warning of carbon monoxide.
- 4.8 **GIUSP:** Gas Industry Unsafe Situations Procedure, the standard for identifying and categorising gas safety risks.
- 4.9 **ID (Immediately Dangerous):** GIUSP category for serious risk requiring immediate disconnection.
- 4.10 **AR (At Risk):** GIUSP category for potential risk where disconnection is advised.

5.0 Roles and Responsibilities

- 5.1 **The HPG Board and relevant committee** provide strategic oversight and ensure assurance structures are in place.
- 5.2 **The Group Chief Executive and Executive Team** lead the compliance culture, secure resources and set performance expectations.
- 5.3 **The Executive Director of Investment and Growth** is the senior sponsor for this policy, ensures strategic alignment and is the named Health & Safety Lead under the Social Housing (Regulation) Act 2023.

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- 5.4 **The Director of Building Compliance and Safety** is responsible for providing strategic and operational leadership and ensuring high performance in compliance and repair services.
- 5.5 **Operational and team-specific** responsibilities are defined within the Heating & Gas Procedure Manual and corresponding job role descriptions. All staff and contractors are required to comply with this policy and associated legal obligations.
- 5.6 **Resident responsibilities:** Residents must allow reasonable access for safety checks, report gas/HHW faults promptly and not tamper with appliances or systems.

6.0 Applicable Legislation and Guidance

6.1 This policy ensures compliance with legal duties for gas, heating and hot water (HHW) systems. The below are the primary sources of duty and guidance.

6.2 The Primary Legislation Applicable to this policy is:

- Gas Safety (Installation and Use) Regulations 1998 (as amended).
- Housing Health and Safety Rating System (Part 1, Housing Act 2004).
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Building Safety Act 2022
- Pressure Systems Safety Regulations 2000 (where applicable).

6.3 Key Approved Codes of Practice and Guidance:

- IGEM/G/11 Edition 2 (Gas Industry Unsafe Situations Procedure)
- HSE ACOP L56 Safety in the installation and use of gas systems and appliances
- HETAS Guidance (Solid Fuel Systems)
- OFTEC Guidance (Oil-Fired Systems)
- Approved Document L (Conservation of Fuel and Power, Volumes 1 & 2)
- Manufacturer's Instructions for Heating Equipment

6.4 Additional Relevant Legislation:

- Normative (Gas Standards) and Informative reference documents documented by Gas Safe within the Legislative, Normative & Informative Document List (as amended).

6.5 A comprehensive and current list of legislation, approved codes and standards is maintained within the Heating & Gas Procedure manual which is updated as regulations change.

7.0 Policy Delivery Programme

7.1 HPG will operate a structured, legally compliant programme to ensure the safe operation of all gas, heating and hot-water (HHW) systems across every fuel type.

7.2 The programme will:

- 7.2.1 Complete annual gas safety checks and servicing of domestic properties in accordance with GSIUR 1998 and HSE ACOP L56.
- 7.2.2 Undertake inspection and servicing of communal and commercial systems at statutory or manufacturer-recommended intervals.
- 7.2.3 Carry out pre-occupation safety checks (including TOAT) after tenancy changes, voids, or mutual exchanges.
- 7.2.4 Service and safety-check landlord-owned appliances and systems for all fuels (gas, oil, solid fuel/biomass, electric, renewables).
- 7.2.5 Install, maintain and test carbon-monoxide alarms as required by legislation and recognised standards, providing clear resident guidance.
- 7.2.6 Ensure unoccupied properties are made safe in line with procedure and that unsafe installations are isolated and reinstated only after safety verification.
- 7.2.7 Take all reasonable steps to gain access for safety checks, using legal routes where necessary.

7.3 Operational detail, including scheduling, data management and escalation processes is defined in the Heating & Gas Procedure Manual.

8.0 Follow-on Works

- 8.1 HPG will apply the Gas Industry Unsafe Situations Procedure (GIUSP) to identify, categorise and address safety risks. Where unsafe situations are identified, systems will be made safe in accordance with legislative requirements and internal procedures. Operational detail on categorisation, escalation, and recording is contained in the Heating & Gas Procedure Manual.
- 8.2 For non-gas systems (oil, solid fuel/biomass, electric, renewables), HPG will take remedial actions in line with relevant standards and manufacturer instructions and isolate unsafe installations, only reinstating after repairs and verification through safety re-inspection.
- 8.3 HPG will record and retain remedial actions, safety certificates and warning notices within compliance records and track to completion for assurance and audit. Any inspection with an unsatisfactory outcome must be fully resolved before issuing a compliant safety record (e.g. LGSR or equivalent).

9.0 Communication and Notification

- 9.1 HPG will ensure that residents, leaseholders, local authorities and other stakeholders are informed of the outcomes of heating and hot water (HHW) safety inspections, servicing and any identified risks in accordance with legal and regulatory requirements.
- 9.2 HPG will provide Landlord Gas Safety Records (LGSRs) and equivalent certificates within statutory timescales and before tenancy commencement where required. Copies will be available electronically through the Tenant Portal or, on request, in alternative formats.

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- 9.3 For communal or commercial systems, HPG will make safety certificates available to residents and managing agents in an accessible way, including by display in a suitable location or electronic distribution.
 - 9.4 Residents will be given reasonable notice of inspections, servicing and remedial visits. HPG will communicate the purpose of visits clearly and provide accessible options for contact or rearrangement.
 - 9.5 HPG will provide residents with clear guidance on carbon monoxide (CO) alarms, including their purpose, testing and action to take if activated. This information will be reinforced during safety visits and in written safety materials.
 - 9.6 HPG will maintain accurate records of all safety communications and will ensure personal data is handled in accordance with the Data Protection Act 2018 and UK GDPR.
 - 9.7 Detailed communication methods, notification templates and escalation processes are defined in the Heating & Gas Procedure Manual.

10.0 Data Management and Record Keeping

- 10.1 HPG will maintain accurate and auditable compliance records for all HHW systems in line with legal, regulatory and corporate data management requirements. Retention periods, system configurations and access controls are detailed within the Heating & Gas Procedure Manual.

11.0 Resident and Stakeholder Engagement

- 11.1 This policy reflects consultation with residents, staff and independent specialists, building on legacy feedback and good practice across the Group:
 - 11.1.1 HPG will engage residents and staff through established forums and feedback mechanisms to inform the ongoing development of heating and hot water (HHW) services and compliance arrangements.
 - 11.1.2 Feedback from inspections, servicing, complaints, and customer surveys will be reviewed to identify themes and inform continuous improvement.
 - 11.1.3 HPG will make reasonable adjustments for residents' individual needs, including disability, age, pregnancy, maternity, or religious observance. Appointment scheduling, communication methods, and visit arrangements will be adapted accordingly.
 - 11.1.4 HPG will provide information in plain English and alternative formats (e.g. large print, Easy Read, translated or interpreted materials) to ensure accessibility for all residents.
 - 11.1.5 The Group will identify and respond promptly to vulnerable households where heating or hot water works may create additional risks, coordinating with safeguarding leads where necessary.
 - 11.1.6 Where essential works result in a temporary loss of heating or hot water, HPG will take proportionate steps to mitigate impact, including the provision of temporary heating or hot-water solutions where appropriate.

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- 11.1.7 Residents will receive clear guidance on the purpose, testing, and response actions for carbon monoxide (CO) alarms as part of safety communications and visits.
 - 11.1.8 In regulated care or extra-care settings, HPG will meet Care Quality Commission (CQC) requirements, including Safe Hot Water and Surface Temperature controls.
- 11.2 Specific engagement activities, vulnerability protocols and communication procedures are defined in the Heating & Gas Procedure Manual and Resident Engagement Framework.

12.0 Competency and Training

- 12.1 HPG will ensure that all individuals involved in the delivery, management, and oversight of heating and hot water (HHW) compliance are suitably qualified and competent in line with statutory and regulatory requirements.
- 12.1.1 All gas work will be undertaken only by competent persons in accordance with the Gas Safety (Installation and Use) Regulations 1998 and HSE ACOP L56. Engineers and operatives must hold valid and appropriate registrations or scheme memberships for the work they undertake (e.g. Gas Safe, OFTEC, HETAS, MCS).
 - 12.1.2 Trainees and apprentices may work only under direct supervision appropriate to their competence level. Supervision arrangements will take account of the needs of young or vulnerable workers and align with the Group's safeguarding responsibilities.
 - 12.1.3 HPG will verify and record the competence and registration of all operatives and contractors through pre-appointment checks, mobilisation reviews, and ongoing monitoring, audit, and assurance activities.
 - 12.1.4 The Group will maintain a central competency and training record for all compliance-related roles. This will include qualifications, refresher training, and competence reassessments, reviewed regularly through established governance arrangements.
 - 12.1.5 All staff and contractors will receive role-appropriate training and professional development to maintain and enhance competence. Training needs will be reviewed at least annually or when there is a significant change in law, standards, or service delivery.
 - 12.1.6 Contract terms will require compliance with this policy, relevant legal duties, and scheme standards. HPG will assure contractor competence through mobilisation, contract management, and performance review.
- 12.2 Operational processes for competence verification, training delivery, and contractor assurance are set out in the Heating & Gas Procedure Manual and Competence Framework.

13.0 Performance Monitoring

- 13.1 HPG will monitor and report the performance of its HHW compliance programme through key performance indicators and governance frameworks approved by the Executive Management Team and HPG Board. KPI definitions and targets are maintained within the Heating & Gas Procedure Manual and Performance Framework.



14.0 Quality Assurance

- 14.1 HPG will operate a proportionate, risk-based quality assurance regime across HHW systems, including independent third-party audits. Audit scope, frequency and methodology are defined within the Heating & Gas Procedure Manual.

15.0 Non-Compliance and Escalation

- 15.1 HPG will monitor compliance performance and escalate non-compliance in line with internal governance arrangements to ensure timely resolution. Escalation criteria, reporting thresholds and corrective action processes are described in the Heating & Gas Procedure Manual.



	Policy Control Sheet Gas Safety, Heating and Hot Water Compliance Policy Policy reference number - 2025/020
Policy Author	David Nicholls – Director of Building Compliance and Safety Nick Pike – Resident Safety Manager
Direct Lead	David Hall – Executive Director of Investment and Growth
Version	1.0- December 2025
Target audience	HPG Staff, Contractors, Customers
Consultation	Wrekin Voices Customer Partnership Panel Directors Operational Delivery Teams Executive Management Team Audit & Risk Committee
Date of Equality Impact Assessment	An Equality Impact Assessment was completed on the 14 th January 2025 and re-visited in June 2025.
Date of Data Privacy Impact Assessment	Not required
Approving Body	Executive Management Team (Delegated by the Group Board)
Date of final approval	18 th December 2025
Implementation date	1 st April 2026
Monitoring arrangements	KPI's Health & Safety Compliance Teams Executive Management Team
Reporting	Executive Management Team – monthly Audit & Risk Committee – Quarterly HPG Board – Quarterly
Review date	October 2028
Expiry date	April 2029
Review cycle	Three-year review cycle
Policy category	Health and Safety
Associated policies and procedures	Building Safety Policy Corporate Health and Safety Policy Damp and Mould Policy Electrical Safety Policy Fire Safety Policy Water Hygiene (Legionella) policy
Policy location	SharePoint HPG Hub Housing Plus Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
D.Nicholls & N.Pike	New HPG policy, bringing together the two legacy organisations approaches	1.0 - December 2025	Executive Management Team – 18 th December 2025

