



Gas and Heating Safety Policy

1. Introduction

- 1.1** This policy sets out how Citizen will meet its obligations under the requirements of relevant regulation and legislation in respect of the management of space heating & hot water safety.
- 1.2** Citizen owns and manages more than 30,000 homes across Birmingham, Coventry, Hereford and Worcester and employs around 1200 people.
- 1.3** Each year people in the UK die from carbon monoxide poisoning caused by gas appliances and flues which have not been properly installed or maintained. Many others suffer ill health from exposure to carbon monoxide.
- 1.4** Citizen is responsible for the maintenance and repairs of its homes, many of which will contain gas installations and electric or renewable energy appliances. The Gas (Installation and Use) Regulations 1998 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. Further and more diverse sets of regulation deal with electric installations and renewable energy.
- 1.5** This policy should be read in conjunction with Citizen's tenancy contracts, licences and leasehold agreements which further define responsibilities. There are also instances where Citizen is responsible for undertaking maintenance where buildings have managing agents. The agreements with those agents define specific responsibilities for each party.

2. Scope

- 2.1** This policy scope comprises:
- fossil fuel space heating installations
 - appliances and relevant flues for natural gas, liquefied Petroleum Gas (LPG), oil and solid fuel
 - Unvented hot water cylinders



- Ground Source Heat Pumps (GSHPs)
- Air Source Heat Pumps (ASHPs)
- Heating Interface Units (HIUs)
- Electric heating systems, and
- Solar Thermal Technologies.

This policy document does not include for the repair & maintenance of customer owned appliances.

Citizen will consider requests from customers to install open flued or solid fuel appliances on a case-by-case basis.

- 2.2** This policy extends to all properties owned by Citizen including those that are untenanted; properties Citizen manage on behalf of others; leasehold and shared ownership properties to which Citizen have a contractual or statutory duty. This includes communal areas of residential blocks of flats, houses in multiple occupation (HMOs) including non-licensed converted houses, properties managed by and for others including workplaces.
- 2.3** This policy is relevant to all Citizen employees, tenants (known also as customers), contractors and other persons and stakeholders who may work on, occupy, visit, or use Citizen's premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon Citizen to maintain a safe environment for tenants and employees within the home of each tenant and within all non-residential premises or areas of buildings.
- 2.4** Citizen takes the health, safety and wellbeing of its residents and staff seriously. It is Citizen's policy to exceed, where possible, the minimum health and safety standard required by law.

3.0 Policy Detail

3.1 Regulatory Standards, Legislation and Codes of Practice

3.1.1 Regulatory Standards

Citizen will comply with all relevant legislation to meet gas and other types of heating safety obligations to protect our customers, their visitors, staff, and contractors from any risk to health and safety.

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All maintenance, inspection and safety standards will be delivered in line with the frequencies set out in relevant legislation to deliver the requirements of this policy, including the use of MOT style servicing to allow more flexibility.

It may be deemed necessary to cap a gas installation for safety reasons. Other teams will be notified at this time who will offer support to the customer.

3.1.2 Sanctions

Citizen 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 & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a judgement from the Regulator of Social Housing.

3.1.3 Customers

Citizen will use all legal remedies available should a customer refuse access to carry out essential safety checks, maintenance, and safety related repair works. However, in exceptional cases and where it is clearly identified that wider welfare risks exist to others, Citizen will consider the use of forced entry to safeguard against any identified risk. Such cases will require written Director approval before any forced access is actioned.

3.2 Compliance Risk Assessment/Inspection Testing Programmes

3.2.1 To comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be completed for all void works, component replacement works and refurbishment projects. This plan will detail any gas or electric installations that may be affected by the works and detail all necessary work required to make safe and reinstate these installations including the requirement for a new gas safety check (LGSR) or electrical check (EICR).

Only approved competent contractors and engineers will be allowed to carry out work in Citizen Housing homes. Both the company and their operatives must be registered on the competent persons scheme and with the appropriate regulatory body.

3.2.2 For gas systems specifically Citizen will carry out a programme of annual safety checks and service to all domestic properties and non-domestic communal areas. This check will include all gas fittings, in scope appliances and flues contained within the property. The frequency of the safety check will not exceed the 12 month anniversary

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or at the start of a new tenancy or following the installation of new gas appliances.

- 3.2.3** Citizen will ensure robust management processes are in place to take advantage of proposed changes to Part F, Regulation 36 (3) of the Gas (Installation and Use) Regulations 1998 that will provide landlords with some flexibility around the anniversary date of LGSRs. If a new gas safety check is completed within 10 months and 1 day of the previous safety check, then the new LGSR can be dated as the 12-month anniversary date of the previous LGSR.
- 3.2.5** Citizen will carry out a programme of annual safety checks and services to all other types of heating systems to include but not exclusive to oil-fired boilers, solid fuel and renewable energy systems. This check will include all fittings, appliances and flues in the property and will be completed no longer than 12 months from the date of the previous safety check and service or as detailed within manufacturer's instructions or industry best practice. These safety checks and maintenance services will be carried out by a suitably competent engineer in accordance with the manufacturer's instructions.
- 3.2.6** Citizen will carry out a programme of safety checks and services to all electrical systems. This check will include all fittings and appliances in the property and will be completed no longer than 60 months from the date of the previous safety check and service or as detailed within manufacturer's instructions or industry best practice. These safety checks and maintenance services will be carried out by a suitably competent engineer in accordance with the manufacturer's instructions.
- 3.2.7** As part of all heating appliance safety checks and servicing of space heating and hot water systems Citizen will inspect and test all domestic smoke, heat and CO detectors. Any necessary repairs identified will be completed within Citizen's published repairing timescales.

3.3 Quality Assurance and Record Keeping

- 3.3.1** Citizen will establish and maintain data of all properties that have an active or inactive (capped) gas supply. This data set will also hold data against each property asset of gas, electric, oil, renewable energy and solid fuel inspection and servicing requirements for all domestic and non-domestic property assets.
- 3.3.2** Citizen will ensure the Gas Safe registered engineer records are retained as well as the details of all accredited engineers working within Citizen properties. All the details of appliances and other equipment (attributes) in every domestic and non-domestic property will be retained.

3.3.3 Citizen 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.

3.3.5 Citizen will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all safety related data.

3.3.6 Certification will be subjected to technical verification by either a competent person or automated verification system and post inspections are carried out on selected properties. Any work on an appliance must maintain safety. The appliance must be examined after work has been done, and any defect notified to the owner/user.

3.4 Reporting of Compliance

3.4.1 Managing compliance is a fundamental function for Citizen Housing, and compliance information is shared across the group. Citizen has a robust reporting process to provide evidence of compliance and attempts for access. Information is provided at all levels of the business including:

- SLT
- Audit and Risk Committee
- Board

The Board has overall governance responsibility for ensuring that the Gas and Heating Safety Policy is fully implemented to ensure full compliance with the regulatory standards, legislation, and codes of practice. Board have delegated approval of this policy to ELT and it will be reviewed every three years (or sooner if there is a change in regulation, legislation, or codes of practice).

The Executive Leadership Team (ELT) will receive reports in respect of gas safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.

Type of Information	Frequency	Reported to
Monitoring Compliance of Gas, Solid Fuel, Oil, Renewable Technology and Unvented Hot Water Systems	Daily	Compliance Management Teams
Access Issues	Weekly	Compliance and Housing Management Teams

Level of Compliance, Access Issues and the legal status	Weekly	Key Stakeholders (SLT, ELT) Key Citizen Compliance & Housing Managers
Level of Compliance Performance against targets	Quarterly	Board

3.5 Heating Safety Management and Responsibilities structure

The person responsible for the overall Gas and Heating Safety	Position: Chief Executive
The person responsible for managing Gas and Heating Safety by developing policy and strategic approach	Position: Director of Building Safety
The Persons responsible for the Day to Day management of the Gas and Heating Safety contracts	Position: Compliance Manager for M&E Specials and the Gas Safety Contract Manager
The competent person/s: - Deputising for the Heating Service Manager / providing technical support	Competent Person – Compliance Manager – M&E Specials Gas Safety Manager Electrical Manager

4.0 Roles, Responsibility and Governance

It is the responsibility of the Board to seek assurance that this Policy is successfully implemented. The Senior Leadership Team and Heads of Service are responsible for ensuring the effective implementation of this Policy and that all staff understand the importance of this Policy, the related procedures and that they comply with them.

Managers are responsible for ensuring that their team have undertaken the appropriate Policy eLearning and training,

Any changes to this Policy must be made in line with the requirements set out in Citizens Standing Orders and our Policy framework.

5.0 Monitoring and review

This policy will be reviewed every 3 years, unless legislation, service delivery or sector developments require otherwise ensuring the policy continues to meet its objectives and take account of good practice developments. Legal advice will be taken to ensure compliance with legal, regulatory, and contractual responsibilities. Where appropriate service delivery reports in respect of this policy as incorporated into our quarterly reporting suite.

6.0 Equality impact assessment

This policy has been subject to an Equality Analysis. Staff working across Citizen have considered the impact of this policy on different groups and communities that we work with. In framing this policy, our staff are committed to not discriminate adversely against any group and will respect the diversity of the communities we are working within.

7.0 Version control

Every change made must be logged in the version control and ALL boxes completed.

VERSION	DATE	AMENDMENTS	APPROVED AT/BY	REVIEW
V 1.0	03/22	New policy created from existing protocol	Board	03/2025
V 2.0	November 2023	Updated following review to include wider coverage of other heating systems – Not published.	ELT	November 2026
V 3.0	June 2024	Full review triggered by the policy MOT process. Bringing in reference to non gas heating installations. Name changed from Heating Safety to Gas and Heating Safety Policy	ELT	January 2027