

Gas & Heating Management Policy

Audience:	Customers, Colleagues, Contractors, Stakeholders, Board Members
Policy Owner:	Executive Director of Existing Homes
Policy Lead:	Head of Building Safety
Approved by:	Executive Team
Approved date:	June 2026
Next review date:	June 2029

1. Context, purpose and scope of the policy

Context

Gas safety is a critical element of our landlord health and safety responsibilities. Failure to manage gas and heating risks can result in serious harm, including fire, explosion or carbon monoxide poisoning. We have a legal duty to ensure gas appliances, flues and associated installations are safely maintained in homes and buildings we own and manage.

We are subject to the Gas Safety (Installation and Use) Regulations 1998, the Health and Safety at Work Act 1974 and associated legislation. Regulation 36 places specific duties on landlords to ensure gas appliances and flues are checked at least every 12 months and that records are maintained and provided to customers.

Maintaining strong governance, clear accountability, competent contractors and robust oversight is essential to delivering safe and compliant homes.

This policy forms part of Moat's statutory building safety compliance framework covering Fire, Legionella, Asbestos, Gas, Electrical, Lifts (FLAGEL).

Purpose

This policy sets out how we manage gas and heating safety across homes and buildings we own and manage. It establishes our approach to meeting statutory obligations, undertaking annual safety checks, maintaining communal heating systems including Heat Interface Units (HIU's) whereby Moat are the responsible person, managing access, responding to unsafe situations and providing assurance of compliance.

It ensures that gas-related risks are reduced so far as reasonably practicable and that customers can feel safe in their homes.

Scope

This policy applies to:

- Residential homes we own and manage where we hold landlord responsibility for gas appliances or heating systems
- Communal boilers, plant rooms and flues
- Oil-fired and solid fuel heating systems where we retain responsibility
- Offices and other buildings under our control
- Customers, colleagues, contractors and visitors in buildings under our responsibility.

This policy does not apply to:

- Properties where we have no landlord or management responsibility
- Appliances solely owned and maintained by customers.

Operational detail is set out in the Gas and Heating Management Procedure.

2. Definitions

- **Landlord Gas Safety Record (LGSR):** The certificate issued following completion of a statutory annual gas safety check.
- **Gas Safe Register:** The official register of engineers legally permitted to undertake gas work.
- **Regulation 36:** The section of the Gas Safety (Installation and Use) Regulations 1998 which sets out landlord duties for annual gas safety checks and record keeping.
- **Communal Gas System:** A centralised heating or hot water system serving multiple dwellings.
- **Competent Person:** An engineer appropriately accredited (Gas Safe, OFTEC or HETAS as applicable) to undertake gas or heating works.
- **Gas Flues:** A pipe or duct that safely removes combustion gases from a gas appliance to the outside of the building. In condensing boilers, flues also help recover heat from exhaust gases.

3. How this policy supports our strategy

This policy supports the delivery of Moat's Corporate Strategy and related supporting strategies by ensuring that building safety risks are identified, controlled and monitored through robust compliance and assurance arrangements.

- Corporate Strategy
- Existing Homes Strategy
- Customer Strategy
- Building Safety Customer Engagement Strategy
- Value for Money Framework
- People and Culture Strategy

Safe management of gas installations protects customers from potentially life-threatening risks.

4. Policy principles

We:

- Put the safety of customers, colleagues and visitors first in all gas and heating decisions.
- Manage gas risks proactively and act promptly where risks are identified.
- Ensure sufficient resources, competence and oversight are in place to deliver our gas safety responsibilities.
- Ensure transparency with customers about gas safety requirements and access expectations.
- Take a proportionate and supportive approach where customers may be vulnerable.
- Continuously improve performance through monitoring, audit findings and incident learning.

5. Aims and objectives

Aim: To ensure gas and heating systems under our responsibility are managed in a way that protects life, reduces risk and demonstrates full compliance with statutory gas safety legislation.

Objectives:

1. Maintain full compliance with statutory and regulatory gas safety requirements.
2. Ensure gas appliances, flues and heating systems are inspected and maintained safely.
3. Manage access effectively to enable timely completion of statutory safety checks.
4. Maintain accurate records to evidence compliance.
5. Provide effective monitoring, reporting and independent assurance.
6. Communicate clearly with customers about gas safety responsibilities and emergency arrangements.

6. Policy actions

Objective 1: Maintain full compliance with statutory and regulatory gas safety requirements

- We will comply with the Gas Safety (Installation and Use) Regulations 1998 and all associated legislation and guidance.
- We will ensure sufficient financial and operational resources are allocated to meet our gas safety obligations.
- We will ensure colleagues responsible for gas compliance receive appropriate training and maintain competence.
- We will cooperate with regulators and respond promptly to any enforcement engagement.

Objective 2: Ensure gas appliances, flues and heating systems are inspected and maintained safely

- We will complete gas safety checks at least every 12 months in accordance with Regulation 36.
- We will complete gas safety checks prior to the start of all new tenancies.
- We will ensure all gas work is undertaken by Gas Safe registered engineers (or OFTEC/HETAS where applicable).
- We will verify contractor accreditation prior to appointment and monitor registration throughout the contract lifecycle.
- We will service and maintain communal boilers and plant rooms annually in line with relevant standards, including BS 6644 where applicable.
- We will maintain oil and solid fuel systems annually through appropriately accredited engineers.
- We will take immediate action where appliances are deemed unsafe, including isolation where necessary.

- We will provide temporary heating or alternative arrangements where safety requires systems to be disconnected.

Objective 3: Manage access effectively to enable timely completion of statutory safety checks

- We will take all reasonable steps to gain access for annual gas safety inspections in line with Regulation 36.
- We will escalate repeated access refusal in line with our No Access Policy.
- We will consider vulnerability indicators and provide appropriate support where required.
- We will only pursue legal remedies where necessary to discharge our statutory duties.

Objective 4: Maintain accurate records to evidence compliance

- We will retain Landlord Gas Safety Records for a minimum of two years.
- We will provide customers with a copy of their Landlord Gas Safety Record within 28 days of the safety check and at the start of a new tenancy.
- We will maintain electronic records of all inspections, servicing, defects and remedial works.
- We will maintain accurate property compliance registers to demonstrate statutory coverage.

Objective 5: Provide effective monitoring, reporting and independent assurance

- We will operate internal monitoring and reconciliation processes to ensure all properties are captured in compliance reporting.
- We will report compliance performance to the Keeping Our Customers Safe panels, Executive Team, Audit and Risk Committee and Board.
- We will commission internal and independent audits as part of our assurance programme.
- We will implement improvement actions where audit findings identify gaps.

Objective 6: Communicate clearly with customers

- We will provide customers with clear information about annual gas safety inspections and access requirements.
- We will provide advice on safe operation of gas appliances and carbon monoxide awareness.
- We will provide clear instructions to customers to contact the National Gas Emergency Service immediately in the event of a suspected gas leak.
- We will respond promptly to customer concerns relating to gas safety.

7. Monitoring, reporting and review

The Executive Director of Property & Assets holds overall accountability for compliance with this policy.

The Head of Building Safety is responsible for ensuring appropriate monitoring arrangements are in place to oversee compliance.

Compliance is monitored through inspection programmes, action tracking, internal assurance reporting, contractor performance monitoring and periodic internal and external audit.

Building safety compliance performance is reported through the Keeping Our Customers Safe governance panel, with escalation through the Executive Team, Audit and Risk Committee and Board where required.

This policy will be reviewed every three years, or earlier if legislation, regulatory expectations or service delivery changes.

8. Equality, diversity and inclusion

This policy will be delivered in line with our Equality, Diversity and Inclusion Policy. An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

9. Data protection

We use a risk-based approach to processing personal data to ensure that we assess any risks to privacy or to the rights and freedoms of people before commencing, commissioning or changing data processing activities. Our Data Protection Impact Assessment (DPIA) process was completed as part of the approval process.

10. Related legislation and regulations

- Gas Safety (Installation and Use) Regulations 1998
- Health and Safety at Work etc. Act 1974
- Gas Safety (Management) Regulations 1996
- Pressure Systems Safety Regulations 2000
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Building Regulations (England & Wales)

11. Related policies and procedures

- Gas and Heating Management Procedure
- Fire Safety Management Policy
- Asbestos Management Policy
- Electrical Safety Policy
- Lift Policy
- Legionella Management Policy
- Health & Safety Management Policy
- No Access Policy
- Contractor Management Policy
- Complaints Policy
- Temporary Moves Policy

12. Customer engagement

We engaged with customers through our Repairs Forum to seek feedback on these policies. Overall, customers felt the policies were clear and comprehensive but highlighted that they can be detailed and would benefit from a more accessible summary. Feedback also emphasised the importance of clear communication about what these policies mean in practice, particularly where works may affect customers in their homes.

In response, we have made minor clarity improvements where appropriate and will develop a short, customer-friendly summary to support understanding. Feedback has been shared with relevant teams and has informed how we communicate building safety more broadly. The feedback loop has been closed with customers.

Document revision history		
Date	Changes approved by	Details of changes made
Add your text here	Add your text here	Add your text here