

Gas Safety (Plus) Policy

1. Policy Scope

At the time of policy approval, Bernicia owns and manages approximately 14,000 tenanted properties. Approximately 93% of these properties contain gas appliances or are served by communal gas heating systems. In recent years, the installation of air and ground source heat pumps, solar thermal systems, and solar PV installations has increased, while a smaller number of properties continue to contain solid fuel or oil-burning appliances. Bernicia is responsible for maintaining all appliances it owns to ensure compliance with applicable safety and performance standards.

This policy sets out Bernicia's commitment to managing all heat-producing appliances in a way that meets statutory, contractual, and regulatory requirements while supporting the organisations transition to low-carbon and sustainable energy solutions. It is supported by the Gas Safety (Plus) Management Plan and Operational Guidance document, which provides detailed operational guidance and procedures.

The key objective of this policy is to demonstrate how Bernicia will meet its responsibilities as a Duty Holder and provide assurance to the Board regarding the safety, reliability, and efficiency of gas and other heat-producing appliances.

This policy applies to the management and maintenance of heat-producing appliances and systems across both domestic and commercial properties, regardless of fuel source. This includes gas, oil, solid fuel, renewable technologies, and communal heating systems where Bernicia has maintenance responsibility.

- Gas-fired appliances, including LPG
- Solid Fuel appliances, including biomass
- Oil fired appliances
- Communal systems
- Air and ground source heat pumps
- Pressure systems
- Solar thermal and solar PV systems
- Properties with a gas supply or readily available gas supply, even if no gas appliances are installed.
- Ancillary activities undertaken during servicing or inspection of the above appliances.

Exclusions: Electric-only heating systems, including night storage heaters, are excluded from the scope of this policy. The electrical safety of these systems is managed through the Electrical Safety Policy, with repairs and maintenance undertaken through Bernicia's responsive repairs and planned maintenance arrangements.

The Gas Safety (Plus) policy will be implemented in line with all relevant legislation including but not limited to:

Gas Safety and Health & Safety Legislation

- Gas Safety (Installation and Use) Regulations 1998 (GSIUR) - governs installation, maintenance, and safety checks of gas appliances and pipework; requires annual gas safety checks for rented properties.
- Health and Safety at Work etc. Act 1974 (HASAWA) - overarching duty to ensure the health and safety, and welfare of employees, contractors, and the public.
- Management of Health and Safety at Work Regulations 1999 – requires risk assessments, safe systems of work, and monitoring of contractors.
- Control of Substances Hazardous to Health (COSHH) Regulations 2002 – relevant for handling gas, fuels, and chemicals associated with heating systems.
- Pressure Systems Safety Regulations 2000 – applies to pressurised heating and hot water systems.

Housing and Building Regulations

- Housing Act 2004 – includes the Housing Health and Safety Rating System (HHSRS), under which hazards from unsafe heating systems must be controlled.
- Awaab's Law (guidance) 2025
- The Landlord and Tenant Act 1985 – duty to keep installations (including heating) in repair and proper working order.
- Building Regulations (Part J: Combustion Appliances and Fuel Storage Systems) - safety standards for the installation of gas, oil, and solid fuel appliances, including ventilation and flue requirements.
- Regulatory Reform (Fire Safety) Order 2005 – ensures safe operation and maintenance of heating systems in communal areas to reduce fire risk.
- Regulator of Social Housings (RSH) Homes standard – requires landlords to ensure the health and safety of tenants.

Energy Efficiency and Low-Carbon Requirements

- Energy Performance of Building Regulations 2012 – requires energy assessments and efficiency standards for new and refurbished properties.
- Renewable Heat Incentive (RHI) and related standards – applies to renewable heating installations such as air and ground source heat pumps, solar thermal systems, and biomass boilers.

Industry Standards

- Gas Safe Register Requirements – certification and competency standards of gas engineers.
- British Standards (BS 6891 for gas pipework, BS EN 378 for refrigerants, etc.) - technical standards for installation and maintenance.

- Manufacturer guidance – for safe installation, servicing, and maintenance of all appliances.

It is essential to ensure that tenants, residents, employees, and visitors remain safe in Bernicia's premises (both individual homes and offices). Failure to properly discharge our legal or regulatory responsibilities may also result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- RSH's intervention judgement
- Reputational damage
- Loss of confidence by stakeholders in the organisation

To comply with all relevant regulatory standards and legal obligations, and to safeguard the health and safety of its tenants, staff, contractors, and visitors, Bernicia is committed to ensuring that the standards set out in this policy are fully implemented and maintained.

2. Policy Standards

Standard 1: Process

At Bernicia, we have clear lines of responsibility for the maintenance of all heating appliances and systems. Our colleagues are supported by well-defined procedures and guidance to ensure compliance and safe working practices.

We will work with tenants to arrange convenient appointment times for safety checks and will use any information our tenants have given us (like preferred contact times) to make appointments easier.

If access to a property cannot be gained after several reasonable attempts, we may use legal powers to enter the home to carry out these safety checks. This is always a last resort and is done to protect the health and safety of everyone in the property and surrounding homes.

Any unsafe situations identified will be managed strictly in accordance with the Gas Safety (Installation and Use) Regulations and other relevant safety standards.

Standard 2: Safety Checks

Bernicia is committed to keeping tenants' homes safe and warm. We will service and maintain all gas, oil, and solid fuel appliances that we own in tenants' homes. Every home will receive a yearly safety check, and a valid safety record will be issued following each inspection. Properties with renewable heating systems—such as heat pumps or solar panels—are also inspected every year.

If tenants have their own appliances, we will carry out a visual safety check during our visit. If we find anything unsafe, we'll disconnect the appliance immediately and inform tenants. Please note, we are not responsible for repairing or replacing tenant-owned appliances.

We also carry out annual checks at properties without a gas supply to make sure that no gas appliances or connections have been added without permission.

If any problems are found during a safety check, we will carry out repairs as quickly as possible, based on how urgent the issue is. We'll always tell tenants how long the repair will take and keep them updated.

When a property becomes empty (void), we make it safe by disconnecting energy supplies and carrying out full safety checks. Before a new tenant moves in, all systems will be reconnected, checked, and serviced to ensure everything is safe and working.

We also inspect and maintain commercial heating and pressure systems, making sure they meet all legal safety standards and follow the manufacturer's servicing requirements.

Standard 3: Additional Safety Measures

Tenants must obtain permission from Bernicia before making any changes to appliances in their home. While approval will not be unreasonably withheld, any alterations affecting heating, ventilation, or fire safety systems require prior approval due to health and safety risks.

Bernicia will ensure that smoke and carbon monoxide alarms are installed, tested, maintained, and replaced where required to help keep tenants safe. We will maintain accurate records and monitor our performance to make sure alarms remain effective and that our legal responsibilities are met.

Wood-burning stoves and open fires are prohibited unless special permission is granted by Bernicia in exceptional circumstances. Any unauthorised installations must be removed at the tenant's expense by a Bernicia-appointed contractor to ensure the property is returned to a safe condition.

We are committed to maintaining safe working practices. Where properties present a higher risk—such as due to repeated no-access attempts or residents shielding for health reasons—we will implement additional safety measures and adapt our inspection methods to effectively manage these risks.

Standard 4: Competency

All engineers and contractors working in tenants' homes are competent and properly qualified. Bernicia only engages with Gas Safe registered companies and engineers

holding the required Nationally Accredited Certification Scheme (ACS) qualifications for all gas-related work. For solid fuel appliances, contractors will hold valid HETAS, OFTEC, or equivalent accreditations.

Bernica regularly assesses that contractors are competent and have the right knowledge and skills. We do this with a formal review each year and whenever there is a change of contract or contractor, as detailed in the Gas Safety (Plus) Management Plan. This ensures all work is carried out safely and to the highest standards.

Bernica ensures that internal staff involved in the delivery of this policy are appropriately trained and competent to carry out their roles. We maintain a skills and training matrix to track role-specific requirements and ensure staff receive the necessary development. Regular reviews and appraisals are conducted to assess competency, identify training needs, and support continuous improvement in safety and compliance standards.

Standard 5: Data Management

Bernica keeps accurate and up-to-date records of all appliances in our homes. We know when each appliance was last checked and when the next safety check is due.

Our Master Database includes all properties with a gas supply, including those that may not currently have a live supply but can be connected. For each property, we record which appliances are present and our responsibility for them.

Where required, we maintain records and certifications of safety checks from the last two years, along with the next scheduled inspection dates. Where safety checks aren't required, we hold appropriate evidence to demonstrate compliance.

If any repairs or remedial work are needed, we track these carefully from identification through to completion. Our records include details such as the appliance, property address, work description, priority, responsible person, completion date, who signed it off, and proof that the work was done.

Standard 6: Assurance

Bernica ensures that everyone working on appliances and heating systems—including gas, solid fuel, oil appliances, heat pumps, and solar systems—is properly trained and accredited. We verify that all work has been completed correctly through inspections and audits, some of which are carried out by independent external experts.

Bernica operates a Permit to Work (PTW) system to ensure that any work with potential safety implications is properly controlled. The system applies to activities that may affect the integrity, safety, or operation of any part of the property or its infrastructure. Before such work begins, formal authorisation is required, supported by a risk assessment and implementation of appropriate safety measures. The PTW system applies to all internal teams, contractors, and third parties, and ensures that work is carried out in a safe,

compliant, and accountable manner. It reflects Bernicia's commitment to maintaining high standards of health and safety across its operations.

We keep our Gas Safety (Plus) Policy and Gas Safety (Plus) Management Plan under regular review. The Assistant Director, Compliance is responsible for maintaining and reviewing the policy to ensure it remains compliant with legislation, regulation, and organisational requirements.

Standard 7: Communication

Bernicia is committed to providing clear and straightforward information to help tenants understand the importance of safety checks and encourage their cooperation in allowing access for these essential visits.

We ensure that staff, contractors, and tenants can easily communicate with one another, to share important safety information.

We have established simple and accessible ways for tenants to provide feedback or raise concerns. These routes are designed to be user-friendly, and feedback is taken seriously, with all issues addressed promptly and appropriately.

Standard 8: Monitoring

Bernicia maintains a detailed performance management suite, as defined in the Gas Safety (Plus) Management Plan, to regularly monitor how well we are meeting our safety responsibilities. We track key performance indicators (KPIs), including how often we gain access to homes for safety checks and when access is not obtained, along with any actions taken to address these issues.

For any properties with overdue safety checks, we provide comprehensive commentary that includes the date the check became overdue, how many days have passed, and the property's current status within our access process to restore compliance. We also highlight any outstanding overdue actions.

Our reporting includes information on the proportion of safety activities completed before and after their due dates within the reporting period, offering additional insight into our performance.

To ensure compliance and quality, we undertake a range of assurance activities, including internal audits, non-negotiable compliance checks, strategic reviews, and third-party assurance inspections. Spot checks and audits verify that our records are accurate, and contractors are performing their duties to the required standard.

Findings from these assurance activities are regularly shared with senior management, the Board, and relevant committees. When areas for improvement are identified, we take prompt action to address them and closely monitor progress.

The insights gained from these monitoring and assurance processes are used to continuously improve our Gas Safety (Plus) Management Plan and ensure the highest safety standards across our housing portfolio.

3. Definitions

Word/Phrase	Definition
Gas and heat producing appliances	Gas and heat-producing appliances: Equipment that directly or indirectly serves a property and is owned by, managed by, or under the control of Bernicia.
LPG (Liquefied Petroleum Gas)	A fuel used for heating and cooking in some properties that are not connected to the mains gas network.
Communal Heating System	A heating system that provides heating and/or hot water to more than one property from a central source.
Renewable Heating System	Heating systems that use renewable energy sources, such as air source heat pumps, ground source heat pumps, or solar thermal systems.
Carbon Monoxide (CO) Alarm	A safety device designed to detect carbon monoxide gas and warn occupants of potential danger.

Version Number: 8.0

Effective From: September 2026

Applicable To: This policy applies to all properties Bernicia owns and manages.

Associated Documents: The following resources support the Gas Safety (Plus) policy and Bernicia colleagues to deliver safe, compliant, and consistent services in line with legal requirements, regulatory standards, and best practice.

- Gas Safety (Plus) Management Plan
- Gas Safety (Plus) Operational Guidance
- Repairs and Maintenance Policy
- Repairs and Maintenance Procedure
- Dampness & Condensation Management Policy
- Dampness & Condensation Management Plan
- Health and Safety Policy
- Home Safety No Access Procedure
- Complaints and Compliments Policy
- Identifying Diverse Needs of Customers Policy

Equality, Diversity & Inclusion: An ED&I Assessment was completed in September 2024. Please contact the Governance team if you require a copy.

Approved By: Executive Director, Assets and Growth

Policy Author: Assistant Director, Compliance

Policy Owner: Director, Assets and Property

Next Review: September 2027

Reference Number: POL-0040

Change Control

Version Number	Effective Date	Amendment made by	Version approved by	Description of changes
1.0	September 2020	Head of Compliance	Executive Director, Assets and Growth	Gas and Multi Fuel Policy have been re-written to include all areas of Gas and Multi Fuel management
2.0	September 2021	Head of Compliance	Executive Director, Assets and Growth	Scheduled review
3.0	September 2022	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
4.0	September 2023	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
5.0	September 2024	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
6.0	September 2025	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, transferred to new policy template, additional legislation added, policy statement changed to standards.
7.0	October 2025	Head of Compliance	Executive Director, Assets and Growth	TVP review – endorsed.
8.0	September 2026	Assistant Director, Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes, linked policy check, new definitions, addition of Ryan Irving Carr, Director of Assets and Property, as Policy Owner following organisational restructure.