



Gas, Solid Fuel, Oil, Renewable and Communal Heating Policy

Policy Owner:

Chief Property Officer

Accountable Lead

Director of Property Maintenance and Building Safety

Document Control	
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Equality analysis	Feb 2022 . No material changes affecting EIA since, will be reviewed at next policy review date.
Next planned review date	Feb 2027

1 Policy Statement and Aims

Curo recognises its duty of care as a developer, landlord and employer. The aim of this Gas, Solid Fuel, Oil, Renewable and Communal Heating Policy (henceforth referred to as Heating Policy) is to set out the key principles and commitments, in line with all relevant statutory obligations for the safe management of all relevant heating appliances within its property portfolio with the exception of electrical heating systems (please refer to the Electrical Safety Policy).

This policy and any subsidiary procedures will set out the management framework that must be adhered to in order to maintain compliance to relevant regulatory and other sector standards and codes of practice.

Failure to adhere to this policy and subsidiary procedures may have significant impacts on customer and colleague safety with resulting legal and financial consequences. This may include prosecution by the Health and Safety Executive (HSE) and/or a 'serious detriment' judgment from the Regulator for Social Housing (RSH) resulting in significant fines and a downgrade of the overall Governance rating of Curo as a registered provider.

2 Legal and other requirements

2.1 Legal

This policy operates in the context of the following key legislation:

- Health and Safety at Work Act etc. 1974 (HASWA)
- Landlord and Tenant Act 1985 (LTA)
- Housing Act 2004 (HA)
- Homes (Fitness for Human Habitation) Act 2018 (HFHHA)
- The Management of Health and Safety at Work Regulations 1999 (MHSWR)
- The Gas Safety (Installation and Use) Regulations 1998 (as amended) (GSIUR)
- Gas Safety (Management) Regulations 1996 (GSMR)
- Heat Network (Metering and Billing) Regulations 2014 (as amended) (HNMBR)
- Housing Health and Safety Rating System Regulations 2005 (HHSRS)
- The Building Regulations 2010 (BR)
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Construction, Design and Management Regulations 2015 (CDM)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

2.2 Other

This policy operates in the context of relevant best practice and sector standards and codes of practice and specifically:

- ACoP L56 – Safety in the installation and use of gas systems and appliances (5th edition 2018)
- Gas Industry Unsafe Situations Procedure, Edition 2' (GIUSP)
- OFTEC – Oil technical books 1-7, Solid Fuel Heating
- HETAS – Technical handbook
- MCS – relevant technical standards

3 Scope and context

3.1 Heating appliances¹

This policy applies to heating appliances, fittings², pipework and systems fuelled by the following energy sources, irrespective of whether it is an individual or communal heating system:

- Gas and LPG
- Solid fuel
- Oil
- Renewable technologies
- District or communal heat recovery

It excludes any electrical heating appliances. Please refer to the Electrical Safety Policy for further information.

Curo has no responsibility for the maintenance of 'supply' pipework³ to the property or meter.

3.2 Persons

This policy applies to all relevant persons including customers, visitors, colleagues, managing agents and contractors, who may be potentially affected by heating risks whilst living or working within any premises which is owned or managed by Curo.

3.3 Premises

This policy and supporting procedures apply to all Curo premises which might be temporarily or permanently occupied, utilised or maintained by the persons identified at 3.2 for residential, community, administrative or other work purposes. For example:

- Individual domestic units inc. market rent properties
- Purpose built blocks of flats
- Converted town Houses, including Grade I & II
- Extra care schemes
- Houses in multiple occupation (HMO's)
- Properties or schemes under refurbishment

- Commercial units
- Sheltered and supported housing schemes
- Community spaces

3.4 Leasehold and shared ownership properties (domestic)

Curo has no direct responsibility for the maintenance of heating systems within domestic leasehold premises unless it is part of wider district or communal heat networks (refer to Procedure section 10.11). However, Curo recognises that holistic building safety is very much dependent on the safe maintenance of heating systems within *relevant* leasehold premises, such as those situated within High Risk Residential Buildings⁴ (HRRBs) and other Multi-Occupancy Residential Buildings⁵ (MORBs). Curo will take a risk-based approach to managing this.

3.5 Leasehold properties (commercial)

Curo has no direct responsibility for the maintenance of heating systems within commercial leasehold premises. However, commercial leaseholders have legal duties as an employer under the HASWA and are responsible for maintaining any relevant equipment within their premises.

Curo takes a risk-based approach and recognises that holistic building safety is very much dependent on the safe maintenance of heating systems within commercial leasehold premises that are structurally linked to HRRBs and MORBs. As such Curo will coordinate annually with commercial leaseholders to ensure that gas and other heating safety checks have been carried out.

3.6 Context

This policy is applicable to Curo Group which includes Curo Places, Curo Choice, Curo Market Rent Services and Curo Enterprise in the context of ensuring gas and other heating systems are properly and safely installed, serviced and maintained.

This policy sits within the context of the wider Health and Safety Property Safety Policy together with the strategic and operational commitments for gas and heating safety identified within the Property Safety Policy and property safety scorecard.

For the purposes of ensuring quality throughout the heating management processes the 'Client' relates to any team which *commission and manage* all heating installation, servicing and data validation programmes. The 'Contractor' relates to either internal or external contractors which *deliver* all heating installs, servicing and response repairs. All references to 'Client' and 'Contractor' within this policy and procedure are made within this context.

4 Principles (key objectives)

As well as securing legal compliance, this policy and associated procedures are intended to promote a proactive approach to the management of gas and heating appliance risks with Curo properties.

4.1 Statutory compliance

Curo will comply with all relevant statutory obligations listed in section 2, specifically, the landlord duties of Regulation 36 of Gas Safety (Installation and Use) Regulations 1998.

- Ensure gas fittings and flues⁶ are maintained in a safe condition
- Ensure that the annual safety check is carried out on each gas appliance and flue within 12 months of the anniversary date.
- Have all installation, maintenance and safety checks carried out by a registered Gas Safe engineer
- Keep a record of each safety check for at least 2 years
- Issue a copy of the most recent LGSR⁷ to existing customers within 28 days of the check being completed, and any new customer when they move in
- Display a copy of the most recent LGSR in a common area of a building where the gas appliance serves a communal heating system to multiple homes.

4.2 Best practice/sector standards compliance

Curo will comply with all best practice and sector standards for other 'heating appliances' in order to meet its general duties under the Acts identified at Section 2. These will form part of the annual home safety check⁸ for all properties regardless of whether they have a gas supply. The 'competent person' or registered technician⁹ will require relevant qualifications which are set out in section 7 of this policy.

4.3 Reasonable Adjustments

Colleagues are empowered to make reasonable adjustments based on individual customer needs ensuring equal access to services.

Colleagues are encouraged to assess each situation thoughtfully and make adjustments where appropriate, considering factors such as accessibility, medical or specific requirements. These adjustments should be made in a way that meets statutory and regulatory requirements, maintains a high standard of service, and supports customers in a fair and respectful manner.

5 Roles and responsibilities

5.1 Combined Board and Exec

The Combined Board, through the Chief Executive and Chief Property Officer will scrutinise and ensure that the Heating Policy delivers Curo's strategic objectives and reflects corporate values.

5.2 Chief Property Officer

Has overall strategic accountability for this policy and associated procedures and is responsible for:

- Leading the strategic and cultural direction for all Property Safety policies and championing property safety at Combined Board
- Providing sufficient resources to meet the requirements of this policy and associated procedures
- Ensuring adequate and timely reporting to the Regulator for Social Housing (RSH) where any 'Serious detriment'¹² situation has been identified

5.3 Director of Property Maintenance and Building Safety accountable for:

- Ensuring sufficient planning and investment for existing Curo assets to maintain heating compliance programmes for the inspection, test and maintenance of all heating appliances (including gas installations¹³)
- Ensuring sufficient planning and investment for the delivery of the heating compliance programme and completion of resulting remedial works
- Ensuring sufficient resources and capacity to deliver heating compliance programmes, replacement installations and remedial works
- Ensuring effective performance monitoring and reporting of all heating key commitments.
- Sponsoring audits of this policy and procedure within agreed timescales and in liaison with the Governance team
- Ensuring potential RIDDOR reportable incidents and other significant incidents are fully investigated, with root cause analysis, and are reported to Executive and Combined Board
- Ensuring this policy and procedure is maintained in date and regularly reviewed

5.4 Director of Asset Management & Procurement accountable

for:

- Ensuring heating systems are considered and planned for, in accordance with legal and other technical standards, within the Home Improvement and Cyclical works programmes
- Ensuring sufficient planning and investment for heating improvement works within the Property Investment programme
- Ensuring accurate collation and management of heating component data through Stock Condition Surveys to adequately inform heating compliance programmes
- Ensuring robust procurement processes for all contracted heating works and any other construction work¹⁴ which may have an impact on heating systems and customer safety, to include the use of subject matter experts (internal or external) to advise and verify required competence and technical standards

- 'Client' commissioning of new installations and related functions as set out in this policy and associated procedures
- Ensuring that arrangements for heating improvement work is properly planned, organised, controlled, monitored and reviewed in coordination with internal and external contractors throughout the project
- Leading on renewable heating, SAP rating and other environmental work where it relates to this policy

5.5 Chief Governance Officer

Responsible for:

- Oversight of compliance with this policy through internal and external audit process (refer to section 17)
- Reporting of any identified 'Serious detriment' situations to the Regulator for Social Housing (RSH)

5.6 Senior Property Safety Manager has 'client' side responsibility for:

- Leading on the effective implementation of the Heating policy and procedure
 - Ensuring all legal and other compliance requirements are met in accordance with identified roles and responsibilities (section 2)
 - Ensuring servicing and compliance requirements are met for all heating systems within the scope of this policy.
 - Delivery of the Principles of this policy through appropriate team plans and objectives.
 - Oversight of the recruitment and selection of the client's third-party audit company for gas servicing activities
- Oversight of Gas and other serious investigations and report to Keep Safe group and BSOG
- Oversight and management of 'No access' properties
 - Performance reporting via the property safety scorecard.

5.7 Property Safety (M&E) Manager

'Client' side responsibility for:

- Ensuring compliance with the HNMB Regulations and required notifications
- Holding regular 'Contractor' performance meetings in accordance with agreed timescales

5.8 Property Safety Supervisor (Heating)

'Client' side responsibility for:

- Quality assurance¹⁵ (QA) checks of new and replacement gas installations including the appliance, gas fittings and documentation – 100%
- Point of contact for external QA contract for oversight of response repairs and servicing (currently GCS) – 10% check
- Technical support and assistance with incident investigations for Curo gas team and relevant external contractors
- Liaison with Curo Homes development teams on specifications for new build¹⁶, installations
- Periodic reporting to management on results of QA checks including any identified trends

5.9 Property Performance Team

(Strategic Asset Manager) 'Client' side

responsibility for:

Adding new heating components to QL based on information received from the business, including for example, heating team, lettings, commercial and development

- Removing heating components from QL based on information received from the business, including for example, disposals, change of use, or acquisitions
- Heating data validation on QL, including overall quality of data and data integrity testing, upkeep and constant reviewing of service cycles and component criteria
- Delegated authority for adding and removing of property safety components (component full access)

5.10 Property Maintenance Manager (Gas and Home Safety)

'Contractor' side, responsible for:

- Acting as the Competent Person for the Curo Gas Safe registration and for keeping it up to date
- Planning and delivery of the annual gas servicing programme working in partnership with the CCT Scheduling Manager
- Completion of all proactive and reactive maintenance for all gas and other heating systems
- Ensuring 100% of Curo let properties receive an annual "home safety check"
- Completion of planned and reactive heating system upgrades or replacements where existing has been deemed to be unserviceable or dangerous

- Issue of the LGSR and other service documentation to customer within 28 days of service
- Management of the 'No Access' process to the point of legal proceedings including controlled access where necessary (in partnership with the CCT Scheduling Manager).
- Ensuring competency standards, certifications and registrations are maintained for all technicians
- Acting on the results of any trends or issues identified as part of the QA process (by Team Leaders and third-party auditors GCS)
- Reporting of all relevant gas incidents through internal process and to Gas Safe following investigation
- Proactive management of gas 'capped' properties in coordination with Tenancy Services and updating of QL data.

5.11 Gas Team Leaders

'Contractor' side responsibility for:

- Supervision and support to registered technicians particularly where any issues have been identified as part of the QA process
 - 10% external QA of registered technicians work and certification
- Ensuring all gas and other related measuring equipment used by the Heating team is within calibration date

5.12 Head of Affordable Development accountable

for:

- Pre-contract technical review – ensuring all heating system design specifications are reviewed and signed off before contract (refer to Curo Design Brief)
- Ensuring the terms of engagement for installation of heating systems is satisfied during the build and all 'client' related compliance aspects are fulfilled in accordance with legislation and Curo procedures
- Ensuring all heating system documentation is in place prior to Practical Completion (refer to Handover Document Tracker)

5.13 Director of Accounts & Lettings accountable

for:

- Ensuring the void property is legally compliant prior to re-letting meeting both internal and legislative standards for heating systems
- Ensuring the heating system is inspected and maintained with appropriate certification issued within the sign-up process

- Recommendation of void heating replacement where unserviceable subject to budget approval (Asset Management)

5.14 Director of Tenancy Compliance & Management accountable

for:

- Management of the 'No access' process *from* the point of legal proceedings
- Support the proactive management of capped properties for vulnerable customers

5.15 Learning & Development responsible

for:

- Liaising with relevant business leads to ensure competency requirements are met.
- Providing assurance to the Keep Safe Group that competency levels are met and that adequate records are held to verify competency levels.

5.16 Contract Business Partner

- Ensuring contractor performance (including audit contractor) is in line with KPIs.
- Delivering contracted programmes (renewables) to time and quality.

6 Delivery, monitoring and review

All aspects of this policy including the delivery of key principles and responsibilities will be implemented through the associated Heating Procedure.

The property safety scorecard provides a mechanism for monitoring the delivery of this policy.

This policy and associated procedure will be subject to a minimum 3 yearly audit and review or sooner where there are legislative or sector best practice changes.

Definitions and glossary

¹ **Heating appliance** – a heating appliance that is fuelled by any energy source including gas, solid fuel, oil, district heating or renewable technologies (but excludes electricity for the purposes of this policy)

² **Gas fitting** – includes gas and LPG pipework, valves (other than emergency controls), regulators and meters, fittings, apparatus and appliances designed for use by consumers of gas for heating, lighting, cooking or other purposes for which gas can be used

³ **Supply pipework** – the gas pipe that connects the supply main in the street to the gas meter in the property. Supply pipework can be external to the property or can be internal if the meter is located internally

⁴ **HRRB** – High Risk Residential Buildings are prescribed as one in which the floor surface of the building's top storey is 18 metres or more above ground level or where the building contains more than 6 storeys.

⁵ **MORB** - Multi-Occupancy Residential Buildings, for the purpose of this policy (not yet defined in law), includes any premises with two or more dwellings that exceeds 11m, for example, general needs blocks or independent living schemes.

⁶ **Flue** - used to safely evacuate gases created by a fossil fuel burning appliance

⁷ **LGSR** – Landlord Gas Safety Record that shall be completed at least annually to comply with Regulation 36 (3) of the GSIUR

⁸ **Home safety check (HSC)** – annual visit by the Property Services team to check all safety aspects of the property heating systems including gas, solid fuel, UHWSS, Thermostatic Mixing Valves, smoke/CO detection, Asbestos management survey, Radon checks, Fire door inspections and Renewables. Also, to accurately record and update QL data if required. This safety check normally includes the “Heating service” but may consist of visual checks only if there is no relevant heating system.

⁹ **Competent person/registered technician** – an operative or business registered with a relevant professional or other oversight body for the purposes of maintaining regulatory and technical standards including Gas Safe, OFTEC and HETAS

¹⁰ **Vulnerable person** – “a person who is or maybe in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself from harm or exploitation” (DoH Safeguarding definition)

¹¹ **Renewable technology** – refers to any system of heating which uses natural resources such as solar energy, wind, air or ground source heat pumps

¹² **Serious detriment** – failure to meet the Regulator for Social Housing consumer standards which may require intervention if it fails the ‘serious detriment test’

¹³ **Gas installation** – includes all gas and LPG pipework, valves, fittings, apparatus and appliances downstream of the main emergency control valve

¹⁴ **Construction work** – as defined within the Construction Design and Management Regulations 2015 including a) the alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, redecoration or other maintenance, de-commissioning, demolition or dismantling of a structure, b) the installation, commissioning, maintenance, repair or removal of mechanical, electrical, gas, compressed air, hydraulic,

telecommunications, computer or similar services which are normally fixed within or to a structure

¹⁵ **QA** – ‘Quality assurance’ check to ensure technical standards are maintained

¹⁶ **New build** – includes both ‘section 106’ properties and Curo ‘design and build’ properties managed through Curo Enterprise