



## Gas Safety Policy

Title:	Gas Safety Policy
Person responsible:	Director of Homes
Customer consultation arrangement:	Customers consulted via Tenants' Committee.
EIA required:	Yes
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Approved by:	Board
Business Strategy Objective	Growing
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Links to other key policies:	<ul style="list-style-type: none"> <li>• Asset Management Strategy</li> <li>• Repairs and Maintenance Policy</li> <li>• Health &amp; Safety Policy</li> <li>• No Access Procedures</li> <li>• Non-Gas Heating Appliance Safety Policy</li> </ul>
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### Document management

Version	Date amended	Amendments
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### 1. Purpose and Scope

#### Purpose

South Lakes Housing (SLH) is a registered provider (housing association) and we own and manage approx. 3300 homes across a wide geography in South Lakeland and Lancashire.

This Policy outlines how SLH will comply with the Regulatory Framework for Social Housing in England as outlined below: Registered Providers must meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

The Gas Safety Policy details how South Lakes Housing will maintain a safe environment for all customers and employees that meets the requirements of the Gas Safety (Installation and Use) Amendment Regulations 2018 (GSIUR). In addition to this, the policy provides assurance to SLH that measures are in place to ensure compliance with the regulations and to identify, manage and/or mitigate risks associated with gas fittings, appliances, and flues. This document details South Lakes Housing's (SLH's) policy for dealing with gas safety.

This policy ensures that SLH remains compliant with all gas safety legislation. This policy ensures that our customers, employees, contractors, and sub-contractors remain safe from the risk of gas while in a SLH property.

### **Scope**

This policy applies to all properties that contain gas appliances owned or managed by SLH.

SLH does not hold a landlord's duty of care in respect of gas installations in leaseholders' or shared owners' homes. The requirements of this policy apply to leasehold dwellings only as required to maintain safety of the Block as a whole in respect to common areas.

Leaseholders and Shared Ownership Customers gas fired appliances are not the responsibility of SLH. Individual leases detail the responsibilities to leaseholders on providing appropriate documentation for cleaning of chimneys and equipment located within the building, leaseholders will be advised at the point of sale. SLH does not service or carry out repairs on these appliances but may consider offering this in future via our approved contractors.

The principles and terms within this document apply to all Colleagues, Contractors, Customers', and volunteers who may be affected when using gas installations at SLH premises. It also applies to all activities associated with domestic and commercial gas appliances, relevant chimney/flue systems and associated pipework when employees and/or contractors undertake works within occupied premises.

## **2. Regulatory and Legislative Requirements**

### **Regulatory Standards**

The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, introduced by the Regulator of Social Housing (RSH).

### **Legislative**

This policy complies with the following legislation:

- Gas Safety (Installation and Use) Regulations 1998 (Amended 2018)
- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Corporate Manslaughter and Corporate Homicide Act 2007
- The Construction (Design and Management) Regulations 2015
- The Housing Act 2004
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Building Regulations 2010, Part J (Combustion appliances and fuel storage systems)  
Part L (L1A, L1B, L2A, L2B) Conservation of Fuel and Power in New and Existing Dwellings (2010)

## **3. Our Approach**

### **Management of Gas Safety**

SLH will ensure that all gas appliances, flues, and fittings have an annual gas safety check undertaken by a suitably qualified Gas Safe engineer. A Landlord's Gas Safety Record

(LGSR) shall be completed annually to comply with Regulation 36(3) of the GSIUR 1998 as amended 2018.

All new installations will receive their first gas safety check within 12 months of being installed and then within 12-month intervals in accordance with the Gas Safety Installations and Use Regulations (amended) 1998.

Gas safety inspections will be carried out on properties where there are incoming gas main/pipes, including properties where the gas meter is capped, or the tenant does not use a gas appliance. This is to ensure the customers' ongoing safety within the property

Void properties will have the gas supply capped or decommissioned within 24 hours of the property becoming vacant as a safety measure. To comply with regulation 35 and 36 (6b) of the Gas Safety (Installation and Use) regulations as amended, SLH will ensure that in the case of a customer vacating a property, gas fittings/appliances are safe before the property is re-let or worked in by other trades. In some cases, the previous customer may have removed appliances unsafely or left their own appliance(s) in place. Any appliances left in place by the previous customer will be removed by the engaged contractor and disposed of.

Gas safety checks or re-commissioning will be carried out before any new or existing customer moves into a property. A Landlord Gas Safety Record will be provided for the new tenant and a copy will be recorded on SLH's Asset Management Database.

A gas safety check will be carried out before completion of a mutual exchange. Suitable checks will be made, and any unsafe equipment rectified or removed. These checks will include a safety check of the appliances, inspection of any system/controls, installation pipework and a gas tightness test.

SLH will ensure that visual checks on customers' own appliances (such as gas cookers and gas fires), are recorded on the LGSR – anything that is 'immediately dangerous' is capped and anything that is 'at risk' is capped with the customers' permission, and in compliance with IGEM/G/11, The Gas Industry, Unsafe Situations Procedure Edition 2.

A Landlord Gas Safety Record will be issued after any planned works that affect any gas boiler, flue or fitting and will be recorded on the asset management database. Where a gas boiler is replaced a new LGSR will be issued. Gas checks are carried out pre and post works.

The approach under this policy ensures any unauthorised and defective alterations or additions to gas installations are rectified or removed on discovery.

### **Service Standards on Gas Safety**

The contractor will write to all customers at least 10 weeks prior to the service anniversary date to make an appointment. A service date will be offered to the customer to accept or amend to a more convenient time, within the 12-month anniversary date of the last service completed.

The contractor will write to customers at a minimum 7 - 14 days before the appointment date (and not more than 14 days before) to remind them of the appointment.

The contractor will issue No Access Letters as follows:

- 1<sup>st</sup> no access letter 49 days to due date
- 2<sup>nd</sup> no access letter 42 days to due date

- 3<sup>rd</sup> no access letter 35 days to due date

SLH will then issue a legal letter 28 days prior to the due date & commence a court injunction process within 7 days of the anniversary of the service due date.

### **Smoke and Carbon Monoxide Detectors**

SLH will ensure that at least once smoke alarm is equipped or installed on each storey of customers' homes where there is a room used as living accommodation. We will ensure a carbon monoxide alarm is equipped in any room used as living accommodation which contains a fixed combustion appliance (excluding gas cookers).

Any faulty or expired smoke alarms will be replaced during the LGSR. The recommended lifespan is 10 years for smoke alarms and carbon monoxide alarms.

### **No Access**

Most customers provide timely access for SLH to carry out routine safety inspections, testing, maintenance and repair but there will be occasions when gaining access can be difficult. In these circumstances SLH will carry out a risk assessment, taking account of the property and occupier and SLH will seek to work with customers to address any issues, taking into account any known or identified vulnerabilities, to facilitate access and ensure the wellbeing of the customer.

In the event of repeated no access SLH will have in place escalation procedures and will take legal action if necessary to gain access. Customers may be recharged for the associated costs.

### **Protecting Customers**

SLH will work with customers to raise awareness of building safety and the steps SLH will take to keep customers safe, including:

- Inform residents of the importance of reporting any issues through the provision of information via the website, newsletters and leaflets.
- Maintain a clear approach to gaining access to carry out works and be clear that enforcement action may be taken when it is necessary to do so.
- Maintain a clear complaints process and monitor and record complaints that indicate a risk to safety.

SLH will provide information for customers on building compliance issues relating to their property and block.

At all stages of this process SLH will ensure customers understand gas safety and if necessary, information will be translated or provided in large print.

### **Customer requests for alterations**

If a customer requests to install an open flued appliance, they are required to seek permission in writing from SLH, in accordance with their tenancy agreement. SLH has taken the decision not to allow any open flued appliances within their properties. This is due to the increased risks associated with them. Please see the list below for the types of equipment (although not exhaustive) that we would reject permission for installation.

- Gas fires
- Multi-Fuel Burners
- Coal Fires
- Wood burning stoves

We will consider an application if extenuating circumstances apply.

## **Competent Persons**

SLH will ensure that the colleagues responsible for operational delivery receive appropriate training to be able to manage the service.

All gas installations/servicing and repairs will only be undertaken by gas operatives who have been authorised to work on gas by the Responsible Person under the terms of the contracts. This will be carried out by using the gas records database and matrix along with Quality Control checks.

Work on gas appliances and installations will only be carried out by operatives who hold current certificates of competence for those appliances and hold a valid Gas Safe Register I.D. card, which they will always carry with them

Any person not authorised to work on gas must not attempt any work relating to gas or which may impact on any gas flue, appliance, fitting, or installation pipework (or any related maintenance that may affect a gas appliance)

Operatives employed on domestic gas work are required to be competent in the following elements: CCN1, CENWAT, HTR1, CKR1, DAH1, and MET1-2. (Also, LPG equivalents where required) In addition to the above minimum requirements for gas work, all engineers where required shall also carry the UHWSS (Unvented Hot Water Storage Systems) Identity Card.

All engineers required to work on commercial gas heating systems must be Gas Safe Registered for commercial systems & must provide their Gas Safe Register cards for inspection every six months.

Any operative employed on non-domestic gas work is required to be competent in the following elements COCN1, CCCN1, CoCATA1, CDGA1, CIGA1, CORT1, ICPN1, TPCP1 and TPCP1A.

SLH's Gas Safe contractors are required to attend regular accredited training courses following any changes or updates in the Gas Safety (Installation & Use) Regulations 1998 as amended. SLH will ensure that procedures are in place & that resources are available to provide all training to enable engineers to complete their duties regarding gas safety.

Auditors of all aspects of gas servicing, safety checks & installations must be Gas Safe Registered & must provide their Gas Safety Register cards for annual inspection.

## **Colleague Training**

SLH will ensure that the Building Safety Manager with responsibility for management and delivery of the gas servicing programme is appropriately qualified and/ or experienced in the area of Gas Safety Testing. If the competent person does not have appropriate qualifications already these should be obtained as soon as reasonably practicable, and second line assurance provided from a competent person to provide sufficient oversight.

Appropriate training will be provided to colleagues on gas safety awareness and this policy and the procedures. This will include team and contractor briefings, e-learning and access to external training.

SLH will establish and maintain electronic records of all gas training undertaken by colleagues.

## **4. Responsibilities**

## **Governance**

SLH board will have overall governance responsibility for ensuring that effective arrangements are in place to comply with SLH's legal obligations in relation to and that the Gas Safety Policy is fully implemented to ensure full compliance with the regulatory standards, legislation, and approved codes of practice. As such, the board will formally approve the policy and review it periodically.

The Board or its delegated Committee will receive regular updates at each meeting (in the form of KPIs), on the Gas servicing programme along with notification of any non-compliance issues identified. This is to provide assurance that the policy is operating effectively in practice.

Executive Leadership Team, Senior Management Team and Audit and Risk Committee will receive reports, at least quarterly, in respect of Gas Safety performance to assure themselves that compliance is being achieved. They will also be notified of any non-compliance issues identified.

## **Roles and Responsibilities**

The list below sets out the delegated hierarchy of responsibility within the organisation according to the requirements of the legislation: -

### **Duty Holder/Appointable Person**

**The Accountable Person under this policy will be South Lakes Housing. The Duty Holder is the Director of Homes** who will delegate certain tasks to the responsible and competent persons.

The 'Duty Holder' is responsible for Health and Safety and must take the right precautions to reduce the risk of incidents/ accidents/explosion (including fire) from gas installations. They will appoint a person or persons to take day- to-day responsibility as an authorised deputy for controlling/assessing any identified risks, prevent/control risks to employees and all stakeholders under their responsibility and putting in place a programme of LGSRs and any remedial works including that of record keeping and reporting.

### **Responsible Persons**

**The Responsible Person(s) for SLH are the Head of Assets and Building Safety and the Building Safety Manager** who will ensure the implementation of the policy and procedures across SLH. They will also ensure all operational procedures are carried out in a timely and effective manner. They will ensure all appointed organisations/ individuals have the appropriate levels of training, skills and knowledge to undertake the tasks and monitor training

They are to make sure that all LGSR's are undertaken, (with the remedial works completed), reviewed, managed, and monitored within a timely manner and by suitably qualified persons. They are to develop, implement, communicate and continually improve SLH gas safety procedures following discussion and agreement with the Duty Holders and following significant or emergency events/reviews. They are to ensure the competent person carries out their duties.

### **Other Teams**

Building Safety requires collaboration and effective communication between teams and the Building Safety Team will work in collaboration with teams across SLH to maintain safety.

The Neighbourhood Team who will offer support to gain access where this is proving difficult.

The Repairs/ Voids teams will ensure all required valid certificates are provided before a property is relet or a transfer or mutual exchange is permitted.

All colleagues who have responsibility for or visit properties have a responsibility to notify the Building Safety Team where circumstances have changed within a scheme/block/property,

The Development Team are responsible for ensuring that any newly built or acquired properties are handed over in line with the Building Safety Teams' requirements and they have a current, satisfactory LGSR before hand over/ purchase. They will arrange for the gas to be capped off and alternative drying out methods are adopted to keep the property heated above 5 degrees.

## **5. Monitoring & Review**

### **Records and Management of Data**

SLH will hold accurate and up to date records against each property it owns and/or manages, identifying when the gas installation was last serviced and tested. From this it will identify the next due testing date and ensure a programme of testing is implemented before the test date expires. Types of gas equipment and smoke alarms will also be kept in the "equipment" section of the Asset Management System.

Inspection and re-inspection dates, along with LGSR records will be held electronically.

An LGSR will be provided for any new tenant and a copy will be recorded on SLH's Asset Management Database. An LGSR will be provided to the tenant after any gas safety check has been undertaken.

The Building Safety Manager will ensure that suitable and appropriate checks on the LGSR data in the Asset Management Database are undertaken on an annual basis.

### **Data Protection**

When handling data sheets colleagues and contractors will come into contact with personal information. The handling and use of the data will be carried out under the General Data Protection Regulations 2018.

### **Independent Audit/Assurance**

Independent auditors will carry out inspections and surveys of not less than 10% of all Gas Safety Inspections and servicing work carried out by our current service provider.

An independent audit of gas safety and will be included in the 3 year Internal Audit plan.

### **Reporting of non-compliance**

SLH will have in place a process for any non-compliance with the policy identified at an operational level. These will be formally reported to the Director of Homes in the first instance as soon as identified. The Director of Homes will agree an appropriate course of corrective action with the Head of Assets & Building Safety to address the non-compliant issue and report details of the same to the Chief Executive within 24 hours.

The Chief Executive or Director of Homes will ensure the Board are made aware of any non-compliance issue so they can consider the implications and act as appropriate, including notification to the Regulator of Social Housing. Formal investigation will be carried out initially

by the respective manager of the area within which the breach has occurred and presented in written form on the standard format to the Director of Homes within 5 days. The Head of Assets and Building Safety will ensure that all recommendations and/or remedial actions are put in place.

### **Review**

This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory changes or to incorporate best practice. In addition, SLH will ensure that the policy is reviewed and if necessary amended, following any significant event or issue such as:

- Independent audit highlighting failings in process or policy.
- Accident/gas leak or explosion due to faulty gas installations, testing or alteration.
- Any significant changes to the building.

### **KPIs**

KPIs will be used to ensure that SLH is compliant with its own policy and is keeping its customers, contractors and the public safe. KPIs will be monitored and recorded on a monthly basis and reported as detailed above.

Operational KPI's are provided by our 2<sup>nd</sup> line assurance consultant to help monitor the performance of the Gas Servicing contractor.

### **Equality Impact Assessment**

In implementing this policy, we aim to treat all customers fairly. An equality impact assessment has been carried out. Where customers require additional support, we will endeavour to provide a service that seeks to meet the needs of a particular individual or household.