

GAS SAFETY POLICY

1.0 PURPOSE & SCOPE

- 1.1 Scottish Borders Housing Association (SBHA) is committed to achieving the highest possible standards of Gas Safety which reflect legislative requirements and meets our Tenants' expectations. This policy is to be read in conjunction with any other relevant SBHA policies & procedures including Repairs and Maintenance Standard, Mutual Exchange Policy, Empty Homes Policy and the Lettable Standard.
- 1.2 The overall aim of this policy is to ensure the safety of Tenants, employees and third parties in properties owned by SBHA which have a gas supply. SBHA recognises the importance of implementing efficient and effective gas safety checks and maintenance programmes and ensuring all gas related work is carried out in a safe manner in accordance with all current regulations.
- 1.3 This policy aims to ensure that all gas systems (both domestic and commercial) within our properties are properly managed and operate safely and that all new installation, maintenance, and safety check work is carried out safely and in accordance with our duties as landlords as required by the Gas Safety (Installation and Use) Regulations 1998. (GSIUR)
- 1.4 This policy is intended to cover all assets owned by the Association, including housing stock, offices, and other buildings. The policy will cover the following works:
- Landlords Annual Gas Safety Inspection and Servicing
 - Gas Repairs and Maintenance Work
 - Empty Homes Property and Change of Tenancy Gas Safety Inspections
 - New or Replacement Gas Installations and Heating

2.0 DEFINITIONS

- 2.1 **Landlords Annual Gas Safety Inspection** is the annual check required by the Gas Safety Regulations on all gas installations and equipment which SBHA have responsibility for. In addition to the safety check the Association will also carry out an annual service on all gas appliances in accordance with manufacturer's instructions to effectively maintain them. Evidence of the Annual Gas Inspection will be provided using a recognised format i.e. Landlords Gas Safety Record (LGSR)
- 2.2 **Gas Repairs and Maintenance Work** are essential day-to-day repairs which are categorised as; emergency, urgent and routine repair works which cannot be left to the next cycle of programmed or planned maintenance without posing a threat to the safety or health of the Tenant, the property or the landlord's repair obligations. Day-to-day repairs are mostly reported by Tenants or arise from re-lets and inspections carried out by the Association. They are essentially reactive repairs.
- 2.3 **Empty Homes and Change of Tenancy Gas Safety Inspections** are checks carried out before the start of a new tenancy either at a change of tenancy or a mutual exchange to ensure no modifications or damaged gas installations or appliances are left which can pose a danger to the next occupant. This check also satisfies the Gas Safety (Installation and use) Regulation 36 (6b) - "a copy of the last record made in respect of each appliance or flue is given to any new tenant of premises to which the record relates before that tenant occupies those premises" Mutual exchange constitutes a new tenant and therefore Regulation 36 (6b) applies.

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2.4 **New or Replacement Gas Installations and Heating** includes the fitting of gas installations in new build properties, replacement of installations through planned or reactive maintenance work and the provision of new gas appliances to replace other forms of heating. Gas installations cover gas central heating, gas fires, gas cookers, ovens, or hobs as well as gas supply pipe work to feed future gas appliances.

3.0 GENERAL PRINCIPLES

3.1 SBHA seeks to ensure all the Association's gas installations and appliances are operated and maintained in a safe and useable condition. To provide a prompt, efficient and effective service that takes consideration of the Tenant's needs and safety of any operatives or third parties working in properties SBHA own.

3.2 To ensure compliance with all relevant legislation and regulations to ensure our gas installations and appliances are maintained in accordance with the landlord responsibilities set out in the tenancy agreements.

3.3 To clearly define the levels and standards of service for the installation and maintenance of gas installations and appliances.

3.4 To ensure that the works carried out through this policy are undertaken safely, effectively, and efficiently, in compliance with good practice.

3.5 To have in place an effective monitoring system of both staff and contractor's performance considering tenant and resident feedback.

3.6 To have procedures in place to ensure the aims of this policy are implemented.

3.7 To report regularly to the Executive Team in terms of financial performance monthly, and KPI performance to the Audit & Compliance Sub-committee, Customer Board and Board of Management on a quarterly basis.

3.8 Where the Association leases out properties, SBHA will be responsible for the annual safety check and service. Where repair works are required the relevant works will be undertaken in accordance with the terms of the lease and this policy may not necessarily apply.

3.9 All Gas engineers employed by SBHA, Contractors or Property Services will be Gas Safe registered, licensed, and competent in the work allocated to them.

3.10 SBHA compliance team will maintain a register of capped appliances which is monitored at the weekly and monthly gas meetings. Escalation to the Neighbourhood Housing team and Warm and Well Coordinator is carried out where the tenants' meters are in debt and require assistance.

4.0 LEGAL FRAMEWORK

4.1 The GSIUR Regulation 36 sets out the requirements for landlords to inspect gas installations at intervals of no more than 12 months and produce a record of the checks, GSIUR also imposes duties on landlords to maintain gas installations in a

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safe condition as well as preventing gas appliances being installed or used in prohibited locations. GSIUR also requires employers (landlords) to only allow qualified and approved registered gas engineers to work on any gas appliances or installations. These sit within the wider context of the Health & Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999.

Under the terms of this legislation, SBHA's specific responsibilities are as follows:

- To ensure that all gas appliances (in their ownership or adopted by them), flues and gas installation pipe work are maintained in a safe condition.
- To keep all LGSR's until 2 further checks have been carried out, or where an appliance or flue is removed for a further 2 years
- To send a copy of the Landlords Safety Certificate to the Tenant within 28 days of the date of the check.
- To ensure that all new Tenants are given a copy of the Safety Certificate prior to occupancy, and this is part of SBHA's sign-up pack
- To ensure that any work carried out on the Association's behalf is carried out by a Gas Safe registered engineer.
- To display a copy of the LGSR in a prominent location where the tenants right to occupy the premises does not exceed 28 days or the gas installation is not within the dwelling, with a notice advising of how an individual copy can be obtained.

5.0 SELECTION AND APPOINTMENT OF CONTRACTORS

- 5.1 All contractors will be procured following SBHA's Procurement Policy and Financial Regulations.
- 5.2 Only approved competent gas contractors and engineers will be allowed to work on or install any of the Association's gas systems and appliances. These companies and engineers must be registered on the Gas Safe Register.
- 5.3 All contractors will be required to show evidence of their Gas Safe Registration and provide written confirmation of the Gas Safe Registration for individual engineers that will be working on any of the Association's properties. Such written confirmation will also confirm which areas of gas work the individual engineers are qualified and certified to carry out.

6.0 LANDLORDS ANNUAL GAS SAFETY INSPECTION

- 6.1 Annual safety checks must be carried out on all appliances within a 12-month period of the last safety check to comply with the current legislation. To ensure this the Association works on annual safety check cycle starting at 10 months to gain access within a 12-month period.
- 6.2 A robust access procedure is in place to cover any no access event. This process will ensure at least 2 attempted appointments/visits to each property by the contractor before our controlled Gain Entry Procedure is invoked (excluding Mid Market Rent properties). The processes will ensure that Gain Entry will occur prior to the current annual service expiring.

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- 6.3 The appointed contractors will provide a rolling programme at least 2 months before services are due and will liaise with SBHA on a regular basis to ensure it complies with the policy and procedure timescales and includes all gas properties.
- 6.4 The safety check will be carried out in accordance with the current regulations by a qualified and approved engineer. On completion the contractor will issue a Safety Check Certificate – the Landlord’s Gas Safety Record (LGSRs formerly CP12) to the tenant within 28 days. A digital copy of the LGSR will be sent to SBHA within 3 working days and it will record the required statutory information and any additional information required under the contract.
- 6.5 On receipt of the LGSR by SBHA it will be checked for accuracy and will be retained on file until 2 further checks have been carried out as a minimum or when appliances or flues are removed from use for a minimum of 2 years from the date of the check
- 6.6 Daily access reports will be monitored on pilot by the compliance team showing all properties where the 2 attempted visits have been unsuccessful and arrangements for a controlled Gain Entry is being undertaken. These reports will detail the addresses and Tenant names and there will be liaison with Neighbourhood teams. A letter is hand delivered to the tenant advising of a gain entry date and the Neighbourhood teams are consulted for assistance and background information.
- 6.7 Monthly management reports will be prepared to monitor the annual gas safety check programme, the no access procedure and the contractor’s KPI performance in relation to the agreed programme and targets.
- 6.8 Progress and performance reports will be provided to the Customer Board, Audit and Compliance Sub - Committee, and Board of Management on a quarterly basis.

7.0 GAS REPAIRS AND MAINTENANCE

- 7.1 This is to cover all day-to-day repairs required to gas installations or heating systems up to but not including complete replacement of systems or appliances.
- 7.2 The contract agreed with the contractor will determine who takes the calls and how this is handled both during and out of hours and this will be communicated to Tenants and other stakeholders.
- 7.3 Any repairs will be categorised in line with the current Repairs and Maintenance Procedures.
- In accordance with our approach to continuous improvement the above response times will be reviewed on a regular basis.
 - The category into which a repair is categorised is solely determined by the Association.
 - Delays and exemptions to the above timescales may occur in circumstances out with the control of the Association, such as extreme weather or non-availability of parts and materials, or where the extent of the work is so large that the timescale cannot realistically be achieved.
 - Flexibility may also be introduced in respect of the above categorisation of work or the timescales, particularly in the case of vulnerable tenants with needs. The decision to apply this flexibility will be at the discretion of the Association.

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- Where there is a gas safety concern then the installation will be made safe within the emergency timeframe, either by the appointed contractor or the national gas emergency service provider until such time that a repair can be completed.
- All gas related unsafe situations are to be dealt with in accordance with the Gas Industry Unsafe Situations Procedure and any additional requirements detailed within SBHA's policies and procedures.
- In all other respects gas installation and appliance maintenance will be in accordance with the Association's Repairs and Maintenance Policy.

8.0 EMPTY HOMES AND CHANGE OF TENANCY GAS SAFETY INSPECTIONS

- 8.1 A gas safety check will be carried on the gas installation and any Association-owned appliances before the start of each new tenancy. As part of the new tenancy sign-up pack a copy of the most recently completed LGSR is provided to the tenant prior to occupancy.
- 8.2 At the start of an empty home/change of tenancy process, the gas meter is capped off after a gas safety check is completed by the contractor. Gas appliances left by the outgoing tenant will be removed from the premises.
- 8.3 On completion of the empty home/reletting the contractor will, at the convenience and in agreement with the new tenant undertake the uncap and commissioning process and complete an LGSR.
- 8.4 If repairs to or servicing of appliances are required these will be undertaken by the external contractor during the empty home process.
- 8.5 A copy of the completed LGSR will also be left in the property.
- 8.6 Properties with gas installations will not be allocated to new Tenants without a current safety certificate.
- 8.7 The contractor will issue a copy of the new LGSR to SBHA within 3 working days.

9.0 GAS APPLIANCE REGISTER

- 9.1 The Association holds a register of gas appliances which is shared with the contractor. The Register will be kept up to date including any gas and appliances in new build or other acquired homes. As a minimum it will detail: -
- A full list of addresses with gas
 - A description of the appliances
 - The make, model and location of the boiler
 - Date of installation (where available)
 - Date of last service

10.0 NEW OR REPLACEMENT GAS INSTALLATIONS AND HEATING

- 10.1 When appliances are added or replaced SBHA will update the register accordingly,

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including new build or other acquired homes. Where any other section or department commissions the installation or replacement of appliances they must notify the Asset Safety Administrator of the changes to enable the register to be updated and provide copies of commissioning records and replacement safety certificates e.g.: the LGSR for new or replacement gas installations and heating.

- 10.2 The Association will ensure that it receives a completion/commissioning certificate for each property prior to handover signed by an approved engineer. The certification must confirm that the installation has been: -
- Installed as per the manufacturer's instruction and in accordance with the Gas Safety (Installation & Use) Regulations 1998
 - Installed in accordance with SBHA's specification
 - Installed by a competent person
 - The system has been fully commissioned in accordance with the manufacturers requirements
 - Rust inhibitor of suitable concentration has been added to the system.

11.0 QUALITY CONTROL

- 11.1 Under the Association's gas servicing and maintenance contract it will be a requirement that the appointed contractors carry out in-house quality control inspections on a 10% sample of the work of all their engineers engaged on the contract.
- 11.2 The contractor will be required to regularly produce details of the quality control inspections carried out to allow the Association to monitor that the checks are being done and that any issues identified are being dealt with appropriately.
- 11.3 In addition to the contractor's in-house quality control the Association will also appoint a qualified quality control assessor to do an audit of 10% of all work carried out by the gas engineer employed by the association.
- 11.4 SBHA's Gas Qualified Asset Safety Officer undertakes a range of checks on both repairs and new installations.
- 11.5 A third-party Gas Safety Audit will be undertaken annually and the results of the inspections and any recommendations that are made will be discussed with the gas contractor. Where necessary, feedback will be obtained from the contractor regarding any improvement measures resulting from failings or shortcomings identified by the audit.
- 11.6 100% of all LGSR's are checked and verified by SBHA's appointed gas auditor, where any deficiencies are highlighted, this is reported back to the organisation that provided the record for corrective action. This is monitored through the monthly gas meeting process and reported as a KPI to the monthly performance meetings.

12.0 ROLES AND RESPONSIBILITIES

- 12.1 In relation to Gas Safety Management, the principal responsibilities are: -

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- 12.2 The Compliance Team has overall responsibility for managing all aspects of gas safety within the Association. This includes the provision of adequate human and financial resources to ensure, as far as is reasonably practicable, that gas systems are installed and maintained in compliance with the Gas Safety (Installation and Use) Regulations 1998. (Appendix 1 – Roles and responsibilities diagram)
- 12.3 The Director of Property Services will:
- Have overall responsibility for gas safety and will identify specific responsibilities within the team
 - Ensure that procedures are in place, and that resources are made available to provide training to staff to enable them to fulfil their duties in relation to gas safety
 - Report performance and issues to the Chief Executive and Executive Team
- 12.4 The Senior Asset Planning Manager will:
- Ensure that Legislative or good practice changes are communicated to all staff involved with any aspect of gas safety management
 - Ensure financial control over the Gas Heating Budgets including ensuring appropriate controls for authorization of reactive replacement gas heating systems.
 - Ensure robust operational management is in place and adhered to.
 - Ensure procurement and Contractual arrangements are made with approved contractors to carry out gas installations, servicing, safety inspections and reactive repairs that comply with all current legislation
 - Each property is maintained, and a landlord safety check is carried out every 12 months and that there is compliance with Gas Safety (Installation and Use) Regulations 1998
 - They are supported by the Compliance Manager, the Asset Safety Officer, and the Asset Safety Administrator
- 12.5 The Compliance Manager will:
- Ensure the contractor complies with the terms of the contract
 - Ensure that any issues affecting the service are dealt with or are escalated if required timeously
 - Report monthly, quarterly, and yearly on the delivery of the service
 - Ensure budget management of the service including the implementation of controls for the authorization of reactive gas heating system replacements
 - Develop management information systems and performance indicators
 - Resolve Stage 2 complaints
 - Ensure the Gas Safety Management Policy and operational procedures for the Association's stock, offices and staff locations are kept up to date with any legislative or good practice changes
 - Ensure all registers and systems are updated accurately and timeously to record the current compliance position, ensuring risks are appropriately escalated for consideration/resolution.

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- 12.6 The Asset Safety Officer will:
- Manage gas related performance and monitoring
 - Monitor Gas Safe gas registration and evidence
 - Confirm verification of gas engineers, contractors and consultants engaged in works
 - Ensure that reactive gas heating system replacement are required and that repairs are not suitable ensuring availability of parts have been thoroughly explored.
 - Ensure records are being maintained effectively
 - Ensure internal quality control of works
 - Provide technical advice
 - Review and recommend specification/contract changes
 - Provide training to SBHA teams
 - Resolve Stage 1 complaints
- 12.7 The Asset Safety Administrator will:
- Maintain the Gas Safe Registration of SBHA
 - Monitor and action no access and arrange gain entry as required to ensure no fails
 - Action referrals for one off replacement systems
 - Check the integrity of the performance information and reporting KPI's
 - Ensure the Solutions Team is up to date and assisting where required
 - Add new install information to the gas register and informing the contractor
 - Assist with task and complaints resolution
- 12.8 The Solutions Team will:
- Check the LGSRs and report any issues
 - Scan and file the LGSRs
 - Update the Gas Register with data from the LGSRs
- 12.9 All SBHA Team members will have a responsibility to understand and follow any gas procedures put in place that is relevant to their own service areas and seek assistance from the compliance team where required.
- 12.10 Tenants will have a responsibility to allow access for any legislative servicing, or any health and safety checks to be carried out, not interfere with, or adapt any gas installation or appliance within their homes and notify SBHA where a new gas cooker is being installed for the correct documentation to be recorded to ensure overall safety that aligns with the guidance in the Tenants Health and Safety Handbook.

13.0 COMPLAINTS PROCEDURE

- 13.1 If there are any complaints from Tenants or others affected by work covered by the Gas Safety Policy, a complaint can be made in accordance with the Association's Complaints Policy, details of which are in the Tenant's Handbook and on the website. All external contractors will notify SBHA of any complaints so that they can be logged and monitored. For technical complaints the Asset Safety Officer will provide support and guidance.

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14.0 EQUAL OPPORTUNITIES POLICY

- 14.1 In line with the Association's commitment to equal opportunities, this policy can be made available in a variety of formats upon request.
- 14.2 SBHA will ensure all contractors and consultants appointed by the Association have an Equality & Diversity Policy. Where no policy exists, contractors and consultants must agree to adopt and operate SBHA's Equality Opportunities Policy.

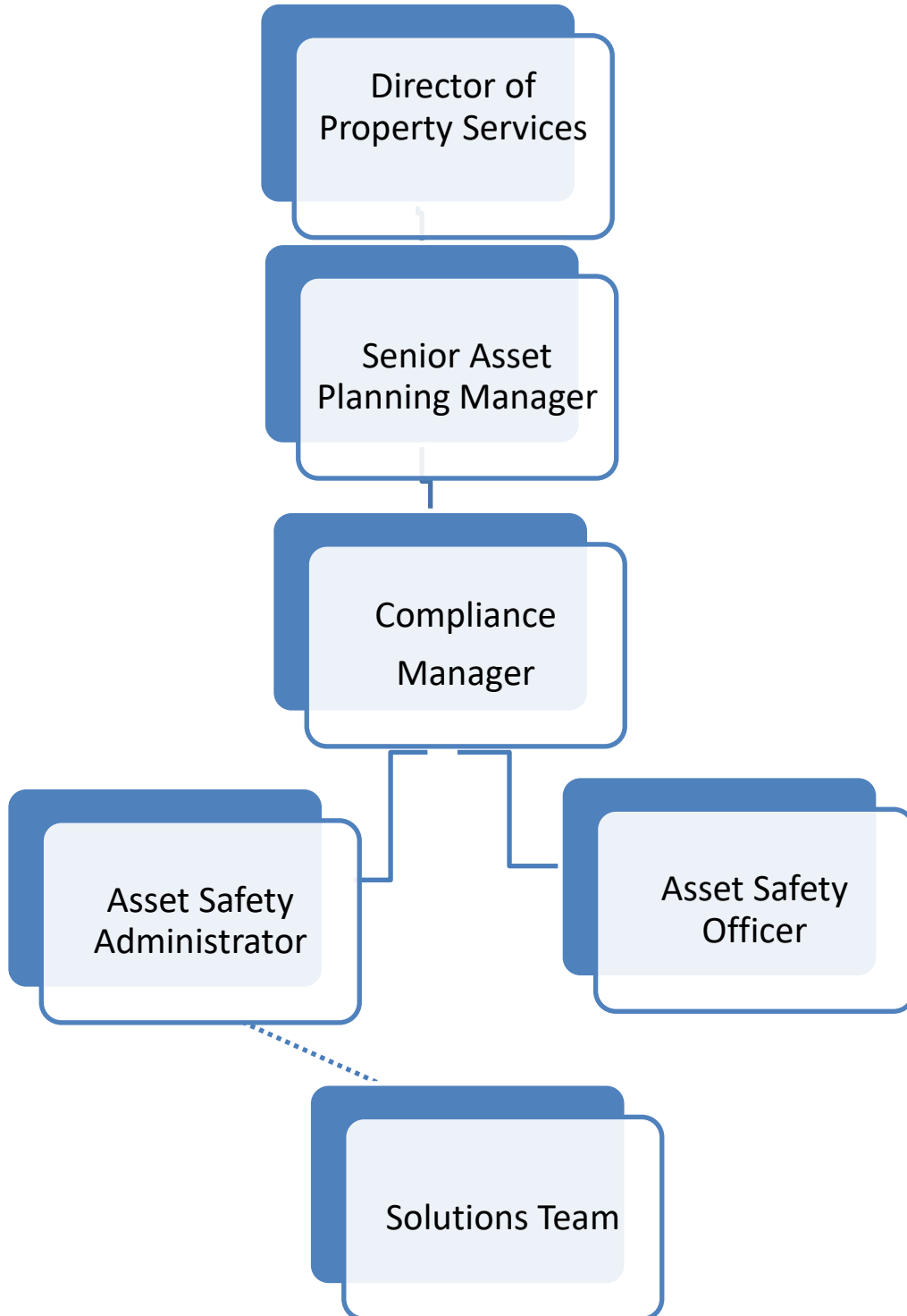
15.0 NOTIFIABLE EVENTS

- 15.1 A breach of this Policy, any event requiring a RIDDOR, or serious, significant, or material incident relating to matters covered by the Policy, SBHA may be required to alert the Scottish Housing Regulator of the incident under Notifiable Events in accordance with the SHR's guidance, and any other governing body that requires to be notified by statutory legislation. In the event of a RIDDOR, SBHA compliance team will liaise closely with the appointed gas consultant to ensure any response is factually correct and appropriate.

16.0 MONITORING AND REVIEW

- 16.1 This policy will be reviewed 3 years from the date of latest review, or after a significant change affecting Gas Safety, changes within the Association or through the mechanism of service delivery.

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Appendix 1 – Main roles and responsibilities diagram