



GAS SAFETY POLICY

Version Number	1
Date Revision Complete	November 2021
Department	Asset Management
Author	Building Service Manager
Reason for Policy creation/revision	Planned review
Data Protection Impact	As a result of the procedure data on our tenants is shared with 3 rd parties out with the organisation. Our Data Sharing Agreement Procedure covers us for this.
Equalities Impact	We have considered any equalities impact and consider there to be none.
Proof read by	Business Transition Lead & Director of Asset Management
Date Approved	25 th November 2021
Approved by	Board
Next Review Due	November 2022 A short review date has been selected to ensure our response to gas safety is as robust as possible.
Audience – Training and Awareness Method	As the procedure has already been enacted all necessary training has been carried out.
Effective Date	26 th November 2021
Internal References – Policies & Procedures (Located on The Hub)	Gas Safety Procedure
External References	As detailed below in section 2

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1. INTRODUCTION

- 1.1 Hanover (Scotland) Housing Association (HSHA) is one of Scotland's leading housing associations, providing homes to over 4,600 residents across Scotland. We are also responsible for a number of properties used to provide a range of support services.
- 1.2 Over 1,300 of those properties have gas appliances and we are responsible for ensuring that a Landlord's Gas Safety Inspection is undertaken within 12 months of the anniversary date or installation of a new appliance in each of those properties.
- 1.3 Annually we are developing a small number of new properties and have a programme for replacing inefficient electric heating with highly efficient gas heating in existing homes.
- 1.4 This policy also covers gas boiler replacement, gas central heating installation, gas pipe work, servicing, maintenance and flues in all properties where we are the landlord. This includes properties added to our stock as a result of building new homes or individual/multiple properties acquired by us from time to time.
- 1.5 It does not apply to any gas appliances, pipe work or installations not wholly owned by HSHA including tenant's own appliances, e.g. gas cookers.
- 1.6 This statement is supported by detailed procedures and processes.

2. REGULATIONS

- 2.1 In terms of gas safety responsibilities, the following is not an exhaustive list of legislation and guidance but is a reference point, signposting to those pieces of legislation and guidance that are most relevant to this procedure:
 - The Health and Safety at Work etc. Act 1974
 - The Gas Safety (Installation & Use) Regulations 1998
 - The Gas Industry Unsafe Situations Procedure
 - Right to Repair Regulations (under the Housing (Scotland) Act 2001)
 - Gas Safety (Management) Regulations 1996 (as amended)
 - Gas Appliances (Safety) Regulations 1995
 - Building Standards (Scotland) Regulations 2014
 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
 - Construction (Design and Management) Regulations 2015
 - Corporate Manslaughter Act 2007.

3. OBJECTIVES

- 3.1 To meet all legal and regulatory obligations and to ensure best practice is followed in relation to gas safety, the aims of this policy are to:
 - Keep the general public, tenants and employees safe from danger;
 - Ensure that we fulfil our legal and regulatory obligations relating to gas safety by:

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- Carrying out an annual gas safety inspection in every home where gas appliances are present, within 12 months of the anniversary date;
- Making it straightforward for tenants to arrange an appointment for annual gas safety inspections, maintenance, repair, installation and upgrading works;
- Maintaining robust procedures and safe systems of work that aim to prevent the release of carbon monoxide from domestic appliances and flues and minimise the risk of accidental damage to pipework and the subsequent release of natural gas. This also includes maintaining emergency procedures to effectively manage any situation if such a release occurs;
- Taking action on any issues raised from the annual gas safety inspection within appropriate timescales;
- Monitoring installations and repairs to gas appliances carried out by our contractors;
- Maintaining gas safety records on all properties, making them available for a minimum period of 2 years.
- Operating and maintaining a robust internal reporting procedure;
- Ensuring that clear audit trails exist in the gas safety procedure and processes;
- Ensuring a Carbon Monoxide (CO) detector is installed in every habitable room containing a gas appliance or flue connected to a gas or solid fuel appliance;
- Ensure that the annual testing of CO, smoke and heat alarms is carried out in every property with a gas appliance.

4. EDUCATION & TRAINING

- 4.1 We will ensure that tenants are provided with relevant information highlighting the risks of not having the annual gas safety inspection. This will include participation in CO awareness campaigns, articles in the tenant Newsletter and Gas Servicing Information Leaflets.
- 4.2 We will raise tenants and staff awareness of carbon monoxide and gas safety including recognising the symptoms of CO poisoning and the procedure to follow if it is suspected.
- 4.3 We will ensure that all procedures relating to Gas Safety support the fair treatment of all tenants with respect to their different needs, circumstances and lifestyle;

5. ROLES & RESPONSIBILITIES

- 5.1 Day-to-day responsibility for the operation and monitoring of our gas safety procedures and processes lies with the Building Services Manager. However, all relevant employees have a responsibility to ensure that the procedures are applied as instructed.
- 5.2 **Individual roles and responsibilities**
 - 5.2.1 There are a number of roles and responsibilities for managing Gas Safety as follows:

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5.2.2 **Chief Executive**

- Monitors through the Director of Asset Management the implementation and effectiveness of Gas Safety Policy and procedures.

5.2.3 **Director of Asset Management**

- Monitors the implementation and effectiveness of the Gas Safety Policies and Procedures on behalf of the Chief Executive
- Ensures all risks are advised to the Board

5.2.4 **Head of Asset Management**

- Responsible for the day to day performance of the Gas function within HSHA.

5.2.5 **Building Services Manager (BSM)**

- The Building Services Manager is the internal 'responsible person'. In liaison with the Head of Asset Management, develops and implement policies, procedures and safe working practices when necessary to enable us to meet our obligations under the Gas Safety (Installation and Use) Regulations 1998.
- Monitors the implementation of the Gas Safety Policy and related procedures through line management to ensure compliance and reports to the Head of Asset Management on a monthly basis as a minimum.
- Works closely with other departments and Managers to ensure safe working practices across the organisation in relation to gas safety.
- Communicates with other teams across the organisation as necessary to ensure regular and effective communication with regards to gas central heating installations, gas servicing, repairs and appliance certification issues.
- Keeps up to date with current and proposed gas safety legislation.
- Ensures that the requirements of the policy and procedures are communicated to all relevant staff, reinforcing such communication on a regular basis.
- Ensures that all appropriate staff receive adequate gas safety awareness training and are encouraged to develop and promote safe working practices and attitudes towards gas safety.

5.2.6 **Property Compliance Officer (PCO)**

- The PCO ensures that all persons or contractors carrying out gas works are trained and competent to do so, and are Gas Safe registered.
- The PCO carries out day to day monitoring of gas compliance to minimise the risk and ensure the procedure is followed
- Advises the BSM of any planned forced accesses in advance
- Ensures that we audit 10 percent of all gas servicing work and documentation by post-inspection. This audit will be carried out by a 3rd party Gas Safe registered contractor or suitable inspecting body.
- Ensure weekly updates on the gas servicing programme are reported to the BSM/HoAM and monthly to through the performance framework to SMT.
- Flags any potential fails to the BSM as a priority and risk assesses the situation to assist the BSM with determining the best course of action to mitigate risk.

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5.3 Enforcement

- 5.3.1 The annual gas safety inspection must be undertaken to fulfill our legal duties as a landlord under Regulation 36 of the 1998 Gas Safety Regulations.
- 5.3.2 We must take all reasonable steps to carry out the annual gas safety inspection. In order to ensure that such steps are taken consistently with all tenants, we will follow the Gas Access procedure to encourage tenants to arrange an appointment for their annual inspection and force access if access is not forthcoming after stage 3.

5.4 Access

- 5.4.1 A 4-stage process of communication will be followed to gain access to tenanted properties to carry out the annual Gas Safety inspections. At 'Stage 4' the tenant will be advised that access to the property will be forced, to carry out the inspection, unless access is provided 7 days before the anniversary date and the tenant will be advised of the forced access date.

5.5 Contractors

- 5.5.1 Contractors will not be engaged unless they are Gas Safe Registered and able to demonstrate competence in gas safety by providing evidence of experience in this type of work, relevant references and that no enforcement or legal action has been taken against them with regard to non-compliance.
- 5.5.2 Contractors must also be able to demonstrate an understanding of CDM regulations within the Health and Safety section of the Invitation to Tender stage of procurement.

6. MONITORING, PERFORMANCE MEASUREMENT AND REPORTING

- 5.1 Our performance with regard to compliance with 1998 Regulations (Regulation 36) will be reported as required to the Senior Management Team (SMT), ELT(executive Leadership team) and Board / Committee as outlined in the Scheme of Delegation. The measure reported will be the number of gas safety fails on a monthly basis.
- 5.2 In addition departmental KPI's will be monitored which expand the above to show
 - Number of properties requiring a Gas Safety Inspection during the reporting period;
 - Number of properties where a Gas Safety Inspection was carried out;
 - Number where the Gas Safety Inspection was not carried out
 - Report on those properties which failed to have a Gas Safety Inspection carried out by the anniversary date and the action being taken to have the inspection carried out as soon as possible.

7. REVIEW

- 7.1 This Policy will be reviewed every 3 years or earlier as required.