



Loreburn Group

Gas Safety Policy

Policy	Gas Safety Policy					
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Policy champion	Head of Investment & Sustainability					

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1. Purpose of this Policy

- 1.1. This policy explains how the Loreburn Housing Group (including Dumfries and Galloway Homes) - hereinafter referred to as “Loreburn”) will manage the risk posed by gas supplies at premises owned, managed, or controlled by Loreburn. Care is to be taken regarding the differences around DG Homes tenancy agreements and Loreburn’s Tenancy Agreement, you are unable to force access into a DG Homes property under their tenancy agreements, therefore these properties must be capped opposed to forced.
- 1.2. The policy ensures fulfilment of the legislative compliance duties placed upon Loreburn.
- 1.3. Loreburn will promote good practice and partnership working in relation to gas safety and the associated risks by ensuring compliance with all regulatory and legislative requirements and promoting the importance of Gas Safety throughout the organisation.
- 1.4. This policy will ensure all gas checks (LGSR), and maintenance works are carried out to a high standard and in accordance with our duties as a landlord, as required by the Gas Safety (Installation and Use) Regulations 1998.
- 1.5. This Policy is supported by the Gas Safety Procedure.

2. Legislative Background

- 2.1. Managing gas safety is high risk, in preparation of this policy we have taken account of the following legal obligations and guidance:
 - Health and Safety at Work Act 1974.
 - Management of Health and Safety at Work Regulations 1999.
 - The Workplace (Health, Safety and Welfare) Regulations 1992.
 - Construction (Design and Management) Regulations 2015.
 - Construction (Health, Safety and Welfare) Regulations 1996.
 - Gas Safety (Installation and Use) Regulations 1998 (Note: Regulation 8(1) as part of this).
 - Scottish Housing Regulatory Advice Note “Maintaining the integrity of gas flues during maintenance/improvement works” January 2014 will be adhered to during all services and related repairs works.
 - Reporting of Injuries, Disease and Dangerous Occurrences Regulations (RIDDOR), Regulation 6(2); installation that as a result of design, construction, manner of installation, modification or servicing,

pose an immediate risk to life or risk of major injury to gas users should be reported.

- Scottish Housing Quality Standard Guidance, Safe Gas/Oil Systems and Appliances, Annex E: Must Be Health, Safe and Secure.

3. Associated Policies

- Planned Maintenance Policy
- Cyclical Maintenance Policy
- Complaints Policy
- Risk Management Policy
- Health and Safety Policy
- Adverse Events Policy
- Customer Excellence Strategy
- Planned and Emergency Decant Policy
- Asset Management Strategy
- Void Management Policy
- Contractor Management and Performance Policy
- Building Standards
- Lone Working Policy
- Risk Flag Policy
- Asbestos Policy
- Design Guide
- Emergency Procedures
- Environmental Policy
- Control of Noise at Work Policy
- Fire Safety Policy
- Manual Handling Policy
- Personal Protective Equipment Policy
- Risk Assessment Policy
- Work Equipment & Workplaces Policy
- Privacy Policy
- Safeguarding Policy
- Working at Height Policy
- Waste Management Policy

4. Aims & Outcomes of this Policy.

- 4.1. To ensure compliance with current legislation, the Scottish Social Housing Charter and best practice.
- 4.2. To ensure the gas safety process is implemented in a professional, effective, and efficient manner, with the highest possible standards of Tenant service.

- 4.3. To achieve continuous improvement in the gas safety process by monitoring Tenant satisfaction, via the Gas Servicing contract and any planned maintenance works-
- 4.4. To have appropriate procedures in place to ensure the aims of this Policy are implemented.
- 4.5. Keep the public, tenants and employees safe.
- 4.6. Encourage Tenants to participate in the continuous improvement of the gas servicing and repairs service, providing a variety of opportunities for involvement via Tenant consultation at the beginning of planned maintenance projects and Tenant satisfaction survey results.
- 4.7. Educate and inform Tenants on the safe use of appliances within their homes via guidance documents, contractor visits, online guidance; Tenants will receive gas safety advice during sign up. Gas safety information will then be shared via social media and LHA newsletters to ensure continued education.
- 4.8. Raise Tenant and staff awareness of carbon monoxide and gas safety via quarterly social media posts, tenant involvement events and annual gas training sessions.

5. Scope of Policy

5.1. This policy covers the below activities:

- In House Repairs Team Reactive Repairs / Installations
- Void Properties
- Mutual exchanges
- Annual gas checks
- Planned Maintenance replacement installs.
- New Build properties
- Employee safety when working with gas appliances.
- Tenant owned gas appliances.

6. Gas Component Replacements

- 6.1. Gas appliances will be replaced in line with the Planned Maintenance programme / Reactive Replacements
- 6.2. The Planned Maintenance programme is developed using the Component information on Loreburn's Housing Management System.
- 6.3. Due to Loreburn's commitment to achieving zero carbon, LHA's preference would be to replace appliances with a zero-carbon emitting appliance, however where this is not practicable a gas appliance will be replaced.

- 6.4. Gas appliances will be replaced with suitable alternative heating sources. The type of heating source will be identified on a case-by-case basis at time of replacement.

7. Gas Safety Inspection Programme

- 7.1. DGHomes are responsible for completing all Gas Safety checks and repairs within their properties.
- 7.2. Loreburn Housing Association will ensure a 12 monthly gas safety check will be carried out on every gas appliance/flue within each property. (Visual Inspection only on gas cookers owned by tenants) This programme is developed via the Compliance Inspections within Loreburn's Housing Management System. The Compliance Inspections show the dates the appliances are due to be checked and replaced.
- 7.3. Void LGSRs will replace annual LGSRs, meaning the cycle will re-start when a property is void, e.g. LGSR completed Jan 23, void LGSR completed Oct 23, new LGSR date will be Oct 24.
- 7.4. To ensure the percentage of units with a valid gas safety certificate is monitored weekly and is reported quarterly to the Health & Safety Executive Group. The target for gas safety check compliance is 100%.
- 7.5. If an appliance is deemed as unsafe during a 12-month check, this appliance will be shut down until the required repairs have been completed. A record will be kept on Loreburn's Housing Management System showing the repair required and evidencing the completion of the repair.
- 7.6. Annual checks will be carried out by a contractor that is registered with Gas Safe. They will have been procured in line with the Procurement and Value for money policy. Contractor competencies will be evaluated at procurement stage in line with the Contract Management Policy and Procedure.
- 7.7. Our policy is that the gas safety contractor should be attempting to gain access to each property based on a 10-month cycle. This provides 2 months in which any access problems can be resolved.
- 7.8. The gas safety check will include an assessment of the basic safety of gas appliances, that Loreburn are responsible for, to ensure they are all working correctly and safely. The check will be carried out in line with the manufacturer's instructions, the Gas Safety (Installation and Use) Regulations 1998 and adequate detectors in line with the Tolerable Standards, or policies that supersede this.

- 7.9. A second gas tightness test must be completed at each service and this information updated on the Plentific App. The Plentific App is an application that allow engineers to complete a LGSR electronically. This is automatically uploaded onto the Plentific App for the TO to review. This is included as a specific question on the Plentific App for the gas engineer to complete “Will you carry out a second gas tightness test?.”
- 7.10. The gas engineer will also carry out a visual inspection of any appliances, for example an appliance owned by a Tenant located within a Loreburn property, which are not owned by Loreburn. They will also carry out a visual inspection of the CO Detector and carry out a test alarm.
- 7.11. The Annual Gas Safety Certificate shall be referred to as the Landlords Gas Safety Record (LGSR).
- 7.12. Where tenants refuse access to complete the Gas Safety Check on 3 occasions, on the 4th appointment access will be forced in line with the Tenant’s Tenancy Agreement. If the check cannot be completed during the forced access e.g. no credit on the meter, the gas supply will be capped and the Tenant advised. Where there is an external meter, access will be forced at the TO’s discretion, or the gas meter may be capped dependent on exact circumstances. Further information on this is provided in the procedure.
- 7.13. Tenants will be recharged if they fail to allow access on the 3rd. appointment. Guidance can be sought in Loreburn’s Recharge Policy.
- 7.14. We will retain a record of the Gas Safety check until there have been 2 further checks of the appliance or flue.
- 7.15. The Procedural Guide details further information on Gas Servicing Safety.

8. Gas Certificates

- 8.1. Once the LGSR has been processed by Loreburn’s Technical Officer, it will be issued to the Tenant within 28 days.
- 8.2. Where a property is leased, the LGSR will be sent to the property via letter and a copy sent to the leaseholder via email. i.e. Dumfries & Galloway Council.
- 8.3. Where the LGSR relates to a communal boiler, the LGSR will be issued to the Later Living Development Managers, or site Manager, who will confirm by return email that they have laminated and displayed the LGSR close to the gas appliance.

9. Gas Repairs

- 9.1. All gas repairs, not resulting from the Annual Gas Safety Check should be reported to LHA's In House Repairs (IHR) team via the Housing Management System.
- 9.2. The IHR Team will then allocate the work to a Gas Safe registered operative and aim to have any work raised completed within the relevant timescale.
- 9.3. In the case of a warning notice being issued following a gas safety check, the contractor will shut down the appliance and will aim to have to repair complete as soon as parts are available.
- 9.4. All repair work will have a work order attached to the repair, this will include details of the fault and completion notes.
- 9.5. To ensure compliance with the GSIUR Regulation 1998, regulation 26(9), IHR operatives, and external contractors, must complete the below checks any time work is undertaken on a gas fitting:
 - The effectiveness of any flue
 - The supply of combustion air
 - It's operating pressure or heat input, or where necessary both. Where not practicable, the combustion performance should be checked.
 - Its operating to ensure safe functioning.

10. CO activations

- 10.1. Where a CO activation has been logged as a repair, IHR should attend to the property and check all appliances, including those owned by the Tenant for any CO leaks. The required repairs should then be completed onsite, and a record of works completed logged on HM.

11. Quality Control Checks

- 11.1. Loreburn will instruct a Gas Safe Registered Engineer to complete audits on 10% of all work's completed by the Gas Servicing contractor; this shall be completed monthly. Any actions or issues will be addressed by the Technical Officer and recorded on monthly contract meeting minutes.
- 11.2. For all new boiler installs or upgrades, the installation Team, e.g. IHR, Stock Investment, will email Gasservicing@loreburn.org.uk advising of installation details. The responsible Team will arrange for a 10% audit check to be completed on all installs completed. All audit work will be recorded by that team on HM.

12. Recruitment within IHR

- 12.1. When recruiting a gas engineer for our IHR Team, a check is carried out to ensure the potential employee has a valid ACS Card, CCN1, Combination Boiler certification and a valid gas analysis certification, a check is carried out with the relevant issuing body.
- 12.2. References are sought for any potential employee to ensure adequate experience in the sector.
- 12.3. LHA's Gas Safe Registration is managed by the IHR Team Manager. This consists of an annual fee to Gas Safe to ensure our Gas Engineers are registered. LHA Gas engineers receive an updated gas safe card annually.

13. Training

- 13.1. As an employer of gas engineers, we are required under regulation 3(2) of the Gas Safety (I&U) regulations to ensure that our employees have the required competence for the work undertaken, in addition to ensuring they are properly experienced and trained.
- 13.2. For all new starts, regardless the level of their role, within the organisation, gas safety awareness training forms part of the induction information provided in the form of how to recognise a potential gas leak, how to respond to this and who to call. The manager of this individual is responsible for ensuring this awareness training is completed.
- 13.3. For existing staff, we have a regular regime of gas safety update training and familiarisation with gas terminology. This is achieved via regular online training, guidance documents given to and staff announcements on central forums.
- 13.4. For those staff involved in managing the Gas Servicing programme, a Gas Safety Awareness in Social Housing Course should be completed to ensure the employee can competently process LGSRs. This qualification can be gained by completing a Corgi Level 2 Course in Gas Safety Awareness in Social Housing.
- 13.5. Call handling staff – checklist in place for identifying gas related issues by phone.

- 13.6. Line Managers will carry out regular reviews on the Gas Safety training provided and completed, where training completion is not obtained, this will be reflected within the Employee's PDPs.

14. On Call Provider

- 14.1. Loreburn's on-call provider will use the same check list as the call handling staff to ensure accurate diagnosis of gas safety issues. The contract manager for the on-call provider will ensure this is in use.
- 14.2. The on-call provider will be given details of on call operatives to contact should a gas repair be reported. The on-call operative will attend and make the appliance safe. If the gas boiler needs to be switched off, temporary heating will be left with the Tenant until a gas safe registered engineer can attend.
- 14.3. The on-call provider will be given a guidance document for reporting a gas safety leak, this guidance will be taken from the SGN (Scotia Gas Networks) website.
- 14.4. Quarterly Audits will be carried out on the on-call provider, this will involve test calls being made to the provider to confirm the processes the provider has in place are robust. These Audits will be carried out by the contract manager for the on-call provider.

15. RIDDOR

- 15.1. Any RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulation) related gas incidents should be reported and recorded in line with Loreburn's Adverse Events Policy & Procedure.

16. Complaints

- 16.1. Loreburn has a commitment to valuing complaints and ensures the organisation benefits from feedback to identify areas for change or improvement.
- 16.2. Loreburn has a Complaints Policy which ensures there are robust and effective procedures in place for complaints to be effectively managed and acted upon.
- 16.3. Anyone dissatisfied with the outcome of their complaint, having exhausted Loreburn's complaints procedure, has the right to refer the matter to the Scottish Public Services Ombudsman.

17. Equality & Human Rights

- 17.1. Loreburn aims to ensure that equality, fairness, dignity, and respect are central to the way we work and how we treat our Tenants. We support diversity and uphold equal opportunities in all areas of our work as an employer and service provider.
- 17.2. Loreburn will not discriminate against tenants, staff, visitors, suppliers, or others based on their age, sex, sexual orientation, race, disability, religion or belief, marital status, pregnancy and maternity or gender reassignment (collectively referred to as 'protected characteristics' in the Equality Act 2010).

18. Risk Management

- 18.1. Loreburn Housing Group has a Risk Management Strategy, Policy, and Procedure. These documents set out how the organisation will manage risk as an integral part of its governance and management systems, ensuring risks are identified, evaluated, and controlled effectively.
- 18.2. Identifiable risks arising from this policy will be monitored and managed by the internal processes set out herein and by regular review of this and all other associated policies and procedures, ensuring risks are mitigated and Loreburn complies with all legislative requirements and regulatory and best practice guidance.

19. Responsibilities Chart

- 19.1. The below chart illustrates the responsibilities of all staff pertaining to this policy:

Responsibilities	Committee / CEO	LET	Head of Asset Management	Team Manager – Cyclical	TO – Cyclical Programmes
To set the policy and direction with regards to gas safety	<input checked="" type="checkbox"/>				
Ensure Loreburn staff have a robust understanding of gas safety and the associated risks		<input checked="" type="checkbox"/>			
Manage Gas Safety service ensuring this is delivered in line with Policy & Procedure			<input checked="" type="checkbox"/>		

Responsibilities	Committee / CEO	LET	Head of Asset Management	Team Manager – Cyclical	TO – Cyclical Programmes
Reporting and update H&S Exec quarterly on Gas Safety check compliance				<input checked="" type="checkbox"/>	
Take lead on day-to-day decisions					<input checked="" type="checkbox"/>
Policy champion			<input checked="" type="checkbox"/>		
Ensure effective and clear communication with key stakeholders including Tenants				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ensuring all properties have a gas safety certificate and reporting concerns to line manager					<input checked="" type="checkbox"/>
Participate in meetings and provide evidence for investigations as required				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ensure complaints feedback is used to improve service			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Working with Head of People & Culture to ensure staff have appropriate training			<input checked="" type="checkbox"/>		
Ensure policy is reviewed every 3 years or as necessary			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Ensure equality and diversity guidance is adhered to			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

20. Policy Review

20.1. The Policy Champion is Head of Asset Management.

20.2. The Policy Champion is responsible for completing the Health and Safety Assessment and Equality, Diversity, and Inclusion Assessment Checklist.

20.3. This policy will be reviewed by the Policy Champion every 3 years or sooner as required due to legislative or substantive change.

Policy Assessment Checklist

Health & Safety Assessment

Does this policy have the potential to affect:

Lone Working	Yes
Safety and/or wellbeing of staff	Yes
Safety and/or wellbeing of Tenants	Yes
Have the above items been considered in the preparation of this policy?	Yes

Comments:

Equality, Diversity & Inclusion Assessment

Does this policy have the potential to affect:

Staff's rights to equal opportunities	Yes
Tenants' / Tenant's rights to equal opportunities	Yes
Tenants' / Tenant's ability to access to homes and/or services	Yes
Have the above items been considered in the preparation of this policy?	Yes

Comments:

Agile Working Assessment

Agile working requirements have been considered and addressed in the preparation of this policy:	Yes
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