

Loreburn Group
Gas Safety Policy



Creating Great Places to Live

Policy	Gas Safety							
Version Reference	Version 4							
Approved by	MC		LET	<input checked="" type="checkbox"/>		MT		
Date of Approval	November 2022							
Review Period	Every 3 Years or as legislation or substantive changes occur							
Review Due	November 2025							
Policy Champion	Head of Asset Management							
Who this policy affects	Staff	<input checked="" type="checkbox"/>	Customers	<input checked="" type="checkbox"/>	Contractors	<input checked="" type="checkbox"/>	Members of the Public	<input checked="" type="checkbox"/>
Where this policy affects	General needs	<input checked="" type="checkbox"/>	Later Living	<input checked="" type="checkbox"/>	Supported	<input checked="" type="checkbox"/>	Offices/staff base	<input checked="" type="checkbox"/>

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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.
- 1.2. The policy also 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 required regulatory and legislative requirements and promoting the importance of Gas Safety throughout the organisation.
- 1.4. This policy will ensure all gas checks 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
- Rechargeable Repairs Policy
- Risk Management Policy
- Health and Safety Policy
- Aid and Adaptations Policy
- Alternation and Improvements 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
- Vehicles & Occupational Driving Policy
- Design Guide
- Emergency Procedures
- Environmental Policy
- Control of Noise at Work Policy
- Fire Safety Policy
- Hazardous Substances Policy
- Manual Handling Policy
- Personal Protective Equipment Policy
- Risk Assessment Policy
- Work Equipment & Workplaces Policy
- Legionella Policy
- Lifting Operations (LOLER) Policy
- Privacy Policy
- Safeguarding Policy
- Working at Height Policy
- Waste Management Policy

4. Aims & Outcomes of this Policy

- 4.1. To establish policies 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 customer service.
- 4.3. To achieve continuous improvement in the gas safety process by monitoring customer satisfaction, via the Gas Servicing contract and any planned maintenance works, and contractor performance.
- 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 customers to participate in the continuous improvement of the gas servicing and repairs service, providing a variety of opportunities for involvement via customer consultation at the beginning of planned maintenance projects and customer satisfaction survey results.
- 4.7. Educate and inform customers on the safe use of appliances within their homes via guidance documents, contractor visits, online guidance; Customers will receive gas safety advice during their sign up. Gas safety information will then be shared via social media and LHA newsletters to ensure continued education.
- 4.8. Raise customer 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
- 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.

- 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. 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. The annual gas safety check date for each property will remain the same regardless of when a void check is carried out. Void gas checks will simply be treated as an additional check and will be funded from the IHR budget. The void check does not include a service.
- 7.4. To ensure the percentage of units with a valid gas safety certificate is monitored monthly and is reported quarterly to the Health & Safety Executive Group. The target for gas safety check compliance is 100%.
- 7.5. Where Loreburn purchase properties with gas appliances in situ, this information is updated on the Housing Management System. The Development Officer will advise the Technical Officer of the properties and the check due date to ensure these are added to the contractor's programme. Documentation required include the gas safety check, boiler warranties and boiler installation commissioning certificate.
- 7.6. If an appliance is deemed as unsafe during a 12 month check, this appliance will be put out of use until the required repairs have been completed. A record will be kept on the Loreburn's Housing Management System showing the repair required and evidencing the completion of the repair.
- 7.7. Annual checks will be carried out by a contractor that is a registered Gas Safe supplier. 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.

- 7.8. 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. This means in a 6 year period we will have carried out an additional gas check.
- 7.9. 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 manufacture instructions, the Gas Safety (Installation and Use) Regulations 1998 and adequate detector in line with the Tolerable Standards, or policies that supersede this.
- 7.10. A second gas tightness test must be completed at each service and this information updated on the Plentific App. 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?).
- 7.11. The gas engineer will also carry out a visual inspection of any appliances, for example an appliance owned by a customer located within a Loreburn property, which are not owned by Loreburn and the CO detector in the property.
- 7.12. The Annual Gas Safety Certificate shall be referred to as the Landlords Gas Safety Record (LGSR).
- 7.13. Where customers refuse access to complete the Gas Safety check on 3 occasions, the 4th appointment will consist of access being forced inline with the customer'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 customer advised. Further information on this is provided in the procedure.
- 7.14. Customers will be recharged if they fail to allow access on the 3rd appointment. Guidance can be sought in Loreburn's Recharge Policy.
- 7.15. We will retain a record of the Gas Safety check until there have been 2 further checks of the appliance or flue.
- 7.16. 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 customer 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.
- 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.
- 8.4. Where a Loreburn property is leased the LGSR will be issued to the property and a copy will be issued to the leaseholder i.e. Dumfries & Galloway Council's Homeless Department.

9. Gas Repairs

- 9.1. All gas repairs, out with the 12 month safety check, are to be reported through 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 5 working days.
- 9.3. In the case of a warning notice being issues following a gas safety check, the IHR Team will ensure the property is attended to within 1 working day and required repair work completed during the visit, or when materials are available if a full replacement is required.
- 9.4. Where a repair is identified at the time of a gas safety check, the contractor completing the check is authorised to complete onsite repairs up to a value of £200. If the required repair is estimated to be over the £200 threshold, this should be reported to Loreburn's Technical Officer who will report this through to the IHR via the Repair Request function on the Housing Management System.
- 9.5. Where there is no available resource, this may be subcontracted out to a contractor that is a registered Gas Safe supplier.
- 9.6. All repair work completed should be recorded and evidenced. This should be stored on our Housing Management System for auditing purposes.
- 9.7. The IHR Gas Safe registered engineers will complete the required repair, a maintenance record is completed for the repair and sent to the Gasservicing@loreburn.org.uk mailbox. The IHR Team are responsible for ensuring a copy of the maintenance record is uploaded to the Housing Management System and sent to the mailbox indicated above.

9.8. 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 operative so as to ensure safe functioning

Confirmation of these checks being completed will be contained within the maintenance record created for all works completed on gas appliances.

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 customer for any CO leaks. The required repairs should then be completed onsite.

11. Quality Control Checks

11.1. Loreburn will request the contractor of the Gas Servicing Contract to carry out one quality control check per month, selected at random, of the work that has been completed by the Gas operative. The appointment should be arranged by the contractor by letter and telephone (where possible) and the date and property emailed to the Technical Officer.

11.2. The contractor should upload the results from these quality control checks to a shared Microsoft Teams channel by the last day of each month. Should an immediate problem be found, the gas contractor is required to contact the Technical Officer via telephone immediately, if the Technical Officer can not be contacted, the contractor should call the Technical Officer's line manager. The Technical Officer will then review these and address any actions or issues identified within the first 2 weeks of any given month. The Technical Officer will make their Line Manager aware of any issues identified and the actions taken to resolve.

11.3. 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. These audits will be stored on Loreburn's Housing Management system and any actions or issues will be addressed by the Technical Officer. The Technical Officer will make their Line Manager aware of any actions or issued identified within 2 weeks of the audit being completed.

- 11.4. For all new boiler installs or upgrades, the installation Team, e.g. IHR, Stock Investment or Development, will email Housinggasr@loreburn.org.uk advising of installation details. The responsible Team will arrange for a 10% audit check to be completed on all installs completed.

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.
- 12.4. We will get new Gas Safe cards as part of our onboarding process.

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.
- 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 directly in the Gas Servicing programme, a Gas Safety Awareness in Social Housing Course is 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. For call handling staff we will have a checklist for them to diagnose any gas related issues.
- 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 be provided with the same check list as the call handling staff to ensure accurate diagnosis of gas safety issues.
- 14.2. The on-call provider will be given details of on call operatives and who to contact should a gas repair be reported. The on-call operative will attend to site and make the appliance safe. If in doing so the gas boiler is required to be switched off, temporary heating will be left with the customer 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 properly 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 customers. 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 customers				<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 customers 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' / Customer's rights to equal opportunities Yes

Tenants' / Customer'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