



## **Gas Safety Policy**

# Contents

# Page

1	Purpose	2
2	Principles	2
3	Review	3
4	Responsibilities	3
5	Scope	3
6	Policy Statement:	
	6.1 Annual safety check	4
	6.2 Maintenance and servicing	8
	6.3 Competent contractors and operatives	9
	6.4 Commercial gas appliances	9
	6.5 Gas leaks and carbon monoxide	10
	6.6 Replacement gas appliances and new gas installations	11
	6.7 Performance monitoring	12
	6.8 Handover of new properties	12
	6.9 AECVs	13
7	Consultation	13
8	Equality Impact Statement	13

# 1 Purpose

This policy has been produced to clarify how we will manage gas safety within all social and market rented properties owned or managed under agreement by North Devon Homes (NDH). The majority of the properties affected by this policy have a mains natural gas supply however this policy also covers a small number of properties where a liquid petroleum gas (LPG) supply is present. Approximately two thirds of the Company's stock has a gas supply.

The Gas Safety (Installation and Use) Regulations 1998 (Reg.36) impose two main duties on landlords; namely to perform annual safety checks on gas appliances and flues (and that a record is kept and issued) and ongoing maintenance of gas pipe work, gas appliances and their flues. In addition NDH must ensure that no gas fitting of a type that would contravene regulation 30 is fitted in any room occupied or to be occupied as sleeping accommodation and that any repairs or alterations that are undertaken to our properties are planned in a way that does not compromise the safety of any appliance or flue that is present at the property.

NDH also believes that the quality of its maintenance service is key to ensuring the satisfaction and peace of mind of its customers as well as the prolonged life of its gas heating and hot water installations.

This policy is supported by further detailed procedural information on monitoring and management regimes for gas appliance servicing and safety checking, gas responsive repairs, new gas installations and the selection of gas contractors.

# 2 Principles

The following principles will apply to this policy:

- It will be open, fair and transparent
- It will reflect the current standards of operation and will be reviewed whenever industry standards, legislation or guidelines change
- It will promote consistency in the approach to the management of gas safety
- It will be positively promoted with regard to informing the company's, staff, customers and board members views and behaviour

- It will be realistic, achievable and provide value for money
- It will be periodically reviewed as set out in section 5
- It will support corporate objectives and service standards.
- It will support the Regulator of Social Housing's home standard.

### **3 Review**

This policy will be reviewed every year or as soon as possible following any relevant change to government policy, regulation / legislation. This will ensure that it continues to operate within best practice, achieve measurable results, and achieve continuous improvement.

The Head of Asset Management will be responsible for ensuring that policy reviews are undertaken, that appropriate consultation takes place and that revisions are reported to the Board for its approval.

### **4 Responsibilities**

NDH's Board of Management is responsible for approving this policy and has delegated authority to the Director of Neighbourhoods and the Head of Asset Management for ensuring that this policy is communicated and implemented.

Detailed procedures will be developed and maintained by the Cyclical Maintenance and Compliance Manager in line with this policy to provide further guidance during delivery of the policy.

The Cyclical Maintenance and Compliance Manager is responsible for ensuring that staff training is provided, and that staff understand the wider issues surrounding this policy, its application and the procedure.

The Development Manager is responsible for Shared Ownership properties up until completion of sale.

### **5 Scope**

This policy covers any relevant gas fitting within social or market rented properties owned or managed under agreement by North Devon Homes.

This policy also covers Shared Ownership properties upon handover from the Developer to North Devon Homes up until the first sale of the property. Thereafter, it is the responsibility of the private owner.

A relevant gas fitting means:

- Any gas appliance, other than an appliance which the tenant is entitled to move from the relevant premises (e.g. tenant owned gas cooker) or any installation pipe work installed in any relevant premises, and
- Any gas appliance or installation pipe work, which, directly or indirectly, serves the relevant premises (e.g. our commercial boilers) and which is either:
- installed in any part of the premises in which North Devon Homes has an estate or interest; or
- is owned by the landlord or is under its control, except that it shall not include any gas appliance or installation pipe work exclusively used in part of the premises occupied for non-residential purposes (e.g. our commercial units)

This Policy sets out the principles in relation to the following:

- Annual Safety Checks
- Maintenance and Servicing
- Competency of Contractors
- Commercial Gas Appliances
- Gas Leaks
- Replacement gas appliances and new gas installations
- Shared Ownership properties
- Performance monitoring.

## 6 Policy Statement

### 6.1 Annual safety checks

*NDH will annually safety check all gas appliances and gas carcasses where there is a gas meter or LPG gas bottle present, including all flues. We will also perform a safety check on all change of tenancies (eg voids and mutual exchanges). This applies only to tenancies where NDH have full responsibility for the gas appliances and*

*therefore excludes managed properties where this is not part of our remit.*

NDH will annually safety check all gas appliances and gas carcasses where there is a gas meter or gas bottle present, including all flues. Where there is a gas carcass present, but no gas meter, we will not perform a safety check.

Customers are informed in their customer agreement of the need to seek permission from NDH if they want to put gas into their property.

North Devon Homes is responsible for the safety of the gas installation from the gas meter into the property. Any pipe work from the meter to the external supply is the responsibility of the Public Gas Transporter (PGT) or LPG Supplier.

North Devon Homes will aim to ensure that the safety certification is less than 365 days old and renewed at every change of tenancy. The certification will be sent to the customer within 28 days of the date of the check. An electronic copy will be retained by the issuing contractor and made available to NDH at all times. This is not applicable where there has been a new gas installation whilst the property was void and the gas safety certificate will form part of the commissioning paperwork.

To ensure that no gas installation exceeds the legislative 365-day interval between gas safety checks, NDH operates a 10 month cycle for its programme of gas safety checking and servicing so our gas contractors will start trying to gain access at 10 months. This allows 2 months prior to the gas safety check expiring within which they can attempt to gain access to properties where the first or subsequent attempts have failed.

In line with The Gas Safety (Installation and Use) Regulations 1998 as amended by the Gas Safety (Installation and Use) (amendment) Regulations 2018(Reg.36A) North Devon Homes can have the gas safety check carried out any time from 10 to 12 calendar months after the previous check but still retain the original deadline date as if the check had been carried out exactly 12 months after the previous check. The original deadline date is also referred to as the MOT style date. Future upgrades to NDH's current database will allow the use of the MOT date on gas servicing.

In the meantime, in order to begin to implement MOT date servicing, NDH will initially use the 2020 LGSR date (or any subsequent Installation

date). NDH will continue to plan service jobs 12 months from the previous years LGSR date but where necessary, and where access has not been allowed, will use the MOT date as the date of going out of compliance.

NDH will make every attempt to gain access to a property but where access is refused by the tenant or the tenant refuses to respond to the appointment letter or calling card, it will enter the matter into court to gain access and all additional costs will be recouped from the tenant. Repeated year on year refusals from the same tenant will result in NDH commencing repossession proceedings or lifetime injunction requests on the grounds of breach of tenancy and behaviour jeopardising the safety of the occupant, visitors and adjacent properties. Where a property has an external gas meter and access for the gas service has not been allowed, NDH will consider capping the gas supply. This will only be done following an assessment to determine whether this action is reasonable. The full details are contained in the gas safety procedures.

A safety check record should not be issued unless and until all the required tests / examinations have been completed on all relevant appliances and flues. North Devon Homes will take action to correct / manage any safety defect shown on a safety record which is not remedied at the time of the safety check.

Where an appliance is deemed to be dangerous the gas contractor will ensure that the appliance is turned off and clearly labeled that it is not to be used until the defect has been remedied. The gas contractor will also ensure that customers are advised of any safety-related defects to appliances owned by the customer and will disconnect the appliance and attach a disconnection notice which states the reason for disconnection.

NDH will not be responsible for the supply of a temporary appliance if they are disconnected where this is a tenant owned appliance. Where a customer refuses to allow a dangerous appliance to be switched off the gas contractor is obliged to call the Public Gas Transporter or LPG Supplier to attend to disconnect the gas supply. For tenant owned appliances e.g. gas cookers NDH will only safety check the installation pipe work up to the shut off device at the inlet to the appliance. Where a tenant has a gas fire installed, NDH will perform a gas safety check which will be recharged to the customer under the service charge agreement on their tenancy or raised as a sundry debt dependent upon the nature of the agreement.

Properties with customer owned LPG cookers only, will be serviced annually and customers will be responsible for the costs of any remedial works deemed necessary by the gas engineer. Due to the Health and Safety risks associated with LPG cooker installations and the additional servicing costs NDH have a working practice to remove installations whenever possible. Any requests for permission to install LPG cookers will be considered on a case-by-case basis, but generally will not be granted.

All safety record paperwork will be kept electronically and for a minimum period of 2 years. This will detail appliance types, flues checked, and details of smoke alarms and Carbon Monoxide alarms fitted at the property.

For all changes in tenancy, apart from where there is a turnaround time that does not permit, eg. 1 day, there will be a 3 step process when the property becomes void. If there is gas and electricity available a service will be completed and the gas will be capped upon the departure of the current customer whilst the voids works commence at the property. If no gas or electricity is available, the gas will just be capped. Once the gas supplier has been contacted and gas has been made available at the property the gas contractor will return and service the appliances and issue a Landlord's gas safety certificate. The gas will be capped upon the gas engineer leaving the property. All properties will be fitted with a smart meter during the void process. A turn on and safety test will then be completed the day that the customer moves in or when convenient to the customer. A copy of the gas safety record will be provided to the customer at the time of handover.

For mutual exchanges where tenants change properties on the same day, the gas safety check will be completed as soon as possible after the move, but in any case, no longer than 4 days after the move. The certificate will be issued to the new tenant(s) and advice will be given on the safe use of the gas installation. Should the new tenant(s) refuse access, then the gas safety access procedures will be followed.

The Development Manager will be responsible for informing the Cyclical Maintenance and Compliance Manager of New Build, Re- furnished Properties or Open Market Purchases coming into management four weeks prior to handover completion. Once the properties have been handed over, the Regeneration team will be responsible for ensuring that the Landlord's Gas Safety Certificate and any commissioning certificates are provided to the Cyclical Maintenance and Compliance Manager, who will ensure the properties are added to the Asset Management Data



Base. Any changes to a property status that affect gas servicing status will be notified to the Cyclical Maintenance and Compliance Manager by an automated report. The asset will then be removed from the Asset Management database and the gas contractor's portal.

The Development Manager will be responsible for Shared Ownership properties upon handover from the Developer, and prior to completion of sale. Due to concerns around Developers not taking responsibility for any future damp and mould issues if properties are left unheated during any void period, North Devon Homes will not cap the gas supply to the meters upon handover for Shared Ownership properties. This will ensure the properties can be heated during any void period, timeframes for which can be much longer for Shared Ownership properties. This policy will only apply during the winter months (1<sup>st</sup> November to 30 April), and a weekly inspection will be carried out by the Regeneration & Development Team to any Shared Ownership properties within North Devon Homes' responsibility where the gas supply hasn't been capped.

At all other times of the year, the gas supply to Shared Ownership properties will be capped upon handover to North Devon Homes.

Detailed procedures will be developed and maintained by the Development Manager in line with this policy regarding Shared Ownership properties.

## **6.2 Maintenance and Servicing**

*NDH will maintain a full servicing and repairs contract*

NDH will maintain a full servicing and repairs contract and any defects noted to NDH appliances will be rectified by the attending gas contractor or the manufacturer / manufacturer's agent if it is still under warranty.

All safety issues raised as a result of a service or repairs visit will be flagged on our database and monitored until resolved by the cyclical maintenance team.

All reactive repairs to gas installations will be undertaken and prioritized in line with Response Maintenance policies and procedures and will be monitored by the Responsive Repairs Manager.

Where an appliance is isolated, awaiting parts, temporary heating will be supplied if requested by a customer. This heating will normally be electric.

### **6.3 Competent contractors and operatives**

*NDH uses contractors for all gas servicing, maintenance and installation work. All contractors undertaking work on the Company's gas installations will be Gas Safe registered and will be checked for competency on site within 3 months of commencement of the contract by NDH's appointed third party auditor.*

All servicing and maintenance will be undertaken by a competent person registered with a current provider approved by the HSE eg (currently) Gas Safe registered.

The contractors' approach to gas safety management will be checked prior to appointment during the normal vetting process.

Regular sample audits of the quality of works and administration of gas contractors will be undertaken by a third party Gas Safe registered company, this will include confirmation that the contractor remains Gas Safe Registered. The target for quality audits will be 10% of the stock with a gas supply audited annually.

NDH will also undertake audits on a percentage of new gas installations in existing properties and this will be the responsibility of the Planned Improvement Manager. A percentage of new-builds with a gas installation will also be audited and this will be the responsibility of the Development Manager to commission and manage these audits.

NDH aims to ensure that anyone working for them that may specify or undertake works that may affect the safe working of a gas appliance e.g. a scaffold affecting the flue of a gas appliance or a new opening too close to the flue of an appliance; has an understanding of the Regulations. This will be done through awareness training for relevant staff. Any works highlighted with a potential risk will be considered systematically as part of the overall work planning process. Advice will be taken from a gas safe engineer if risk assessments identify this to be appropriate. Current practice will be documented in the Asset Management procedures.

### **6.4 Commercial gas appliances**

*NDH owns and maintains a small number of commercial appliances which supply the communal heating and hot water to three of its larger sheltered housing schemes.*

A Landlord's Gas Safety Certificate will be issued for all these appliances every 12 months. These appliances will also be serviced every 12 months and have plant checks completed on a quarterly basis. The Cyclical Maintenance and Compliance Manager will be responsible for ensuring all checks are completed and the paperwork recorded appropriately.

### **6.5 Gas Leaks and Carbon Monoxide**

*All properties with a gas appliance shall have a carbon monoxide alarm fitted.*

Should a customer report a gas or Carbon Monoxide escape, then the member of staff from NDH dealing with the report will do so as a priority over all other tasks.

The member of staff receiving the report of the gas leak, natural gas, LPG or Carbon Monoxide will advise the customer to:

- Turn off the gas supply at the meter
- Extinguish all sources of ignition / naked flames
- Ventilate the building by opening all the windows and doors
- Not to smoke
- Not to operate electrical lights or power switches
- Ensure access to the premises is possible
- To phone the National Gas Emergency Service on 0800 111 999, or if the property is on LPG call the Suppliers emergency line.

In the case of an incident relating to Carbon Monoxide the member of staff will query if any members of the household are showing symptoms of Carbon Monoxide poisoning, if they are then emergency service should be called.

The member of staff will also arrange for the appropriate gas contractor, natural gas or LPG, to attend site as an emergency and rectify the leak and report the cause to the Responsive Repairs Manager.

Where the cause of the leak is the customer's negligence, their own faulty equipment or as a result of a contractor / person employed or engaged by them they will be recharged for the works. The customer will be required to supply the name and contact details of any person who

worked on the system, their details and the cause of the defect be supplied to National Grid as required by the current gas safety regulations. Where the customer refuses to supply the details of the person who worked on the system then the customer's name will be supplied to National Grid as the responsible person.

This procedure will be shared with North Devon Homes' out of hours operator and the team of managers who act as out-of-hours duty managers.

Where an unsafe situation is identified that is reportable under the requirements of Reporting of Injuries, Diseases, and Dangerous Occurrence Regulations (RIDDOR), 1995, details will be passed to NDH's Safety Advisor. The Health and Safety Advisor will notify the Health and Safety Executive (HSE) either by telephone or electronically within 24 hours of the incident.

#### **6.6 Replacement gas appliances and new gas installations**

*The Planned Maintenance programme for gas boiler installs is produced based on a lifecycle of 15 years for gas boilers.*

Where systems fail prior to the scheduled planned maintenance replacement, NDH will install replacement heating and hot water appliances.

NDH will only install room sealed (balanced flue) appliances for new installations or replacements. Existing open-flued gas fires and/or back boilers will be removed and not reinstated when they are identified for renewal. A carbon monoxide alarm will be installed in every room with a fuel burning appliance as standard.

It will be recommended that gas fires be removed at the point of a central heating upgrade. Should the fire be owned by the customer then suitable compensation, in line with the compensation policy applicable at the time may be considered. NDH will not grant permission for customers to install their own gas fires the reasoning for this being:

- The boilers NDH install are very energy efficient and there is no need for fires as secondary forms of heating
- There is a requirement for ventilation which reduces the overall energy efficiency of a property
- The additional servicing costs
- The additional Health and Safety risks eg CO poisoning, fire, burns etc.

As we work to reduce the number of LPG cookers and installations permission will generally not be granted for customers to install LPG appliances in their homes, but we will review each application on a case-by-case basis. For example, there are some instances where a medical condition may mean that an LPG heating system is required in the event of a power failure.

### **6.7 Performance monitoring**

*NDH will maintain a comprehensive asset database of all heating and hot water gas appliances, company-owned cooking appliances and gas installations within its stock.*

This database will be provided to those who undertake the servicing and safety checks and will be updated whenever a gas appliance or installation is installed, renewed or removed.

NDH will also undertake gas safety management audits to establish the effectiveness of gas related mechanisms, working practices, policies and procedures and also to ensure that the Company is keeping up to date with the ever-changing industry best practice.

The Company's stated target Key Performance Indicator (KPI) is to ensure that at all times 100% of the gas installations within its property are covered by a Landlord's Gas Safety Certificate. Regular monitoring of the Company's asset register and contractors' service schedules will be undertaken to ensure that this target is met at all times and any lapses are reported immediately to the Executive Team.

This KPI is reported to the Board of Management and Executive Team via the Company's Quarterly Performance Reports (QPR). All properties where access has not been gained during the specific timescales are reported via the QPR with explanation of action taken / being taken.

### **6.8 Handover of new properties**

*NDH will ensure that all relevant paperwork and certification is available at the time of handover.*

It is the responsibility of the Development Manager to provide the Cyclical Maintenance and Compliance Manager with the handover pack for properties completed via programmes managed by the team, such as new build developments including purchase of section 106 properties, refurbishment schemes and open market acquisitions. In the case of section 106 acquisitions the Development and Regeneration Team will ensure that upon completion of purchase, keys are handed

over to the Cyclical Maintenance & Compliance Manager to undertake the LGSR certificates on the day of letting said property. In the case of the handover of general development schemes the team will ensure that the LGSR certification forms part of the handover pack to the Cyclical Maintenance & Compliance Manager ready for letting.

### 6.9 AECVs

North Devon Homes will, at the next annual service and if practicable, install Additional Emergency Control Valves (AECVs) in all flats that are second floor or higher where the gas meter is located on the outside of the building. All flats located on first or ground floors will have AECVs installed at the time the boiler is replaced.

## 7 Consultation

The following have been consulted in developing the policy:

Date	Consultation methodology	Challenge / impact / result

## 8 Equality Impact Assessment

### 8.1 Potential impact on each of the diversity “groups”.

Strand	No impact	Negative impact	Positive impact	Comments / evidence (if negative impact, how does the policy address this)?
Race	x			
Disability	x			
Gender	x			
Gender Reassignment	x			
Sexual orientation	x			
Religion or belief	x			
Age	x			
Rural issues	x			
Social Inclusion issues	x			
Pregnancy and maternity	x			

Marriage and civil partnership	x			
--------------------------------	---	--	--	--

## 8.2 Does the Policy promote equality of opportunity? Yes

This policy will be applied fairly and consistently to all customers of NDH and in compliance with the Single Equality Act 2010 which recognises the “protected characteristics” as; gender, transgender, race, marital status, pregnancy and maternity, ethnic origin, nationality, disability, sexuality, age, religion and belief.

This document or parts of it will be produced on request in other languages (wherever possible) or formats such as large print to ensure that everyone is able to access the policy.

*Language Line* provides all corporate translation services and they may be contacted on 0800 169 2879.

NDH is committed to the principles of fairness and respect and therefore seeks to embed statutory guidance and policy relating to Equality and Diversity into all activities.

<b>Next review date:</b>	<b>Responsible Manager</b>
Annual November 2024	Head of Asset Management
<b>Author</b>	<b>Related Documents</b>
Head of Asset Management	