

Paragon Asra Housing Limited

PA Housing GAS SAFETY POLICY

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Paragon Asra Housing Limited PA Housing is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats, we will provide them.

1. Policy Statement

- 1.1 **Paragon Asra Housing Group (PA Housing)** owns and manages a range of assets including single dwellings and non-domestic assets. The key objective of this policy is to describe how PA Housing will manage the risk from gas appliances and installations so far as is reasonably practicable. This includes:
- The identification of its specific responsibilities for each of its assets.
 - The creation of a Gas Safety Management Plan (GSMP) and associated staff training to provide guidance on the implementation of the commitments contained in this policy.
 - The key activities (e.g., gas safety checks) that PA Housing undertakes.
 - Maintaining competent staff and contractors.
 - Communication internally and with customers and other stakeholders
 - How the Board, as duty holder, will delegate responsibility for the implementation of policy, monitor its effectiveness and receive assurance of compliance.
- 1.2 The scope of this policy covers gas installations. Such installations typically include gas pipework, appliances, and flues.
- 1.3 PA Housing will seek to comply with all current and relevant statutory obligations, including the following where applicable:
- The latest version of the Gas Safety (Installation and Use) Regulations (GSIUR).
 - The Building Regulations 2010.
 - The Housing Act 2004.
- 1.4 PA Housing takes the view that delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985 will also be met.
- 1.5 In addition, PA Housing must meet the requirements of both the Regulator for Social Housing's (RSH) Homes Standard and the requirements of the Care Quality Commission (CQC).
- 1.6 Our primary objective is to ensure that customers, contractors, staff, and visitors remain safe in our premises (both domestic and non-domestic). Failure to properly discharge our legal responsibilities may also result in:
- Prosecution under the Health and Safety at Work Act 1974, or Corporate Manslaughter and Corporate Homicide Act 2007.
 - Regulatory intervention by the RSH or CQC.
 - Reputational damage.
 - Loss of confidence by stakeholders in the organisation.
- 1.7 This Policy statement establishes the broad framework for compliance with the key statutory and regulatory obligations.

2. Roles and Responsibilities

- 2.1 Detailed roles and responsibilities will be documented within the GSMP and associated Operational Guidance. The overarching roles and responsibilities are as follows:

The PA Housing **Board** has overall responsibility for approving this Policy, delegating responsibility for its implementation, monitoring its effectiveness at high level, and receiving assurance of compliance. The PA Housing Board will also ensure that there is a system in place that provides adequate protection from detrimental treatment or victimisation for anyone making disclosures that they genuinely believe to be necessary in the interests of Gas Safety.

The **Audit Committee** will be responsible for ensuring that the PA Housing Board receives the assurance it requires.

The **Chief Executive Officer (CEO)** will be responsible for the implementation of the Policy and will allocate responsibilities within the Executive Management Team (EMT) and ensure that there is adequate management, monitoring and visibility of performance. The CEO will recommend this Policy to the Board on behalf of the EMT.

The **Assistant Director of Asset Management & Compliancy** will take overall responsibility for the delivery of the Policy commitments described in the Data, Key Activities to Manage Risk and Communications sections of this Policy. The **Assistant Director of Asset Management & Compliancy** will attend the Health and Safety Committee (HSC) meetings and ensure that areas of non-performance are reported and escalated where required. All potential, material non-compliance will be reported to the CEO/ EMT irrespective of whether this relates to a KPI scrutinised by the EMT or other groups.

The **Assistant Director of Asset Management & Compliancy** will take overall responsibility for planning and implementing the assurance activities described in this Policy and for the effective upward reporting of performance.

The **Senior Gas Manager** or appointed deputy will chair the Gas Safety Core Group and will use this Group for the dissemination of information, problem solving and decision making for matters regarding Gas Safety. The **Senior Gas Manager** will ensure that any issues arising are escalated to the **Assistant Director of Asset Management & Compliancy**.

All **Directors** will take responsibility for ensuring that staff and contractors they employ have the skills, knowledge, and expertise necessary to deliver the commitments outlined in the Policy. Directors will identify Competent Person(s) (internal or external) suitable for the delivery of specific tasks.

Competent Person(s) will have a responsibility to identify any concerns about their own competency for the task that they are being asked to undertake and recommend additional competency is procured where required.

3. Management Plan

- 3.1 PA Housing will maintain a GSMP and associated Operational Guidance which shall:
- Provide additional guidance on how the commitments outlined within this Policy will be implemented.
 - Provide clear lines of responsibility for the management of Gas Safety.
 - Set out key Operational Processes.
 - Ensure that a clear and consistent process is in place to obtain access to properties where this is required. This will include pro-active assessment of available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement action will be used where required.
 - Maintain a process for dealing with unsafe situations.
 - Identify all other policies linked to delivery of this policy.
- 3.2 All staff who have roles identified in the GSMP will receive associated training appropriate to their role.

4. Data

- 4.1 PA Housing acknowledges that to meet its obligations it must maintain a robust approach to identifying the assets and components for which it has responsibility. PA Housing will:
- 4.1.1 Maintain an up-to-date master database of all properties that will indicate both where it does and does not have a responsibility for: landlords gas installations; other gas installations. This will include the identification of properties where PA Housing has no responsibility but has an interest (e.g., a block managed by others but PA Housing owns a leasehold dwelling).
- 4.1.2 Where a responsibility for a landlords gas installation exists, hold full copies of the current and previous two Landlords Gas Safety Records (LGSR)– which shall be completed in accordance with the Management Plan - spanning at least the last two years along with key reportable and auditable information from the same including but not limited to: the unique property reference (UPRN); details of the landlords gas appliance(s) (including any unique identifier); date of last test; date of next test; dates and evidence of attempts to gain access at each stage of the access procedure.
- 4.1.3 Where a responsibility for other gas installations exists, hold full copies of the current and previous two records of adequate inspection (spanning at least the last two years) and maintenance along with key reportable and auditable information from the same including but not limited to: the unique property reference (UPRN); details of the gas appliances; date of last test; date of next test.

- 4.1.4 Maintain current and up to date, reportable and auditable records of remedial works arising from an LGSR or other gas safety related inspection, maintenance, or testing. The records will include: UPRN; detail of the work item required; if an unsafe situation was recorded and link to associated evidence; target completion date; person responsible; completion date and associated sign off; and evidence of completion.
- 4.1.5 Where PA Housing has no responsibility for a gas safety activity described in this policy but has one or more residents living within a block where one may be required, PA Housing will write to the responsible person on an annual basis asking for written confirmation that:
- They are fully aware of all relevant legislation and their obligations.
 - All relevant activity - including but not limited risk assessment, inspection, testing, remedial works, and maintenance - has been undertaken by a person competent to do so and is not overdue.
 - They are in full compliance with all relevant legislation.
 - PA Housing has been informed of any material issues relating to resident health and safety.

Where PA Housing does not receive an adequate response, it will take reasonable steps to follow this up. Further details will be contained within GSMP. Records will be kept for the current and previous year.

- 4.1.6 The approach to data control will be documented in the Data Management Protocol and GSMP.

5. Key Activities to Manage Risk

5.1 Landlords Gas Installations

- 5.1.1 To this policy landlords gas installations will include all relevant gas fittings in accordance with regulation 36 of GSIUR. For the avoidance of doubt, this excludes those that are owned by the tenant (including flues solely connected to an appliance owned by the tenant). and excludes any gas appliance or installation pipework used solely in a part of a premises occupied for non-residential purposes.
- 5.1.2 There are two main duties on PA Housing in relation to landlord's gas installations: annual safety checks on gas appliances and flues and effective ongoing maintenance.
- 5.1.3 PA Housing will undertake a gas safety check on all landlord's gas appliances in accordance with GSIUR and record the findings on the LGSR. This will be carried out annually - i.e., not more than 12 months since installation or the last check safety. This will be carried out by a Gas Safe registered engineer with appropriate qualifications.

- 5.1.4 Whilst not the responsibility of PA Housing, tenants gas appliances shall be given a visual inspection with results noted on the LGSR at each annual gas safety check.
- 5.1.5 All landlords gas installations shall be effectively maintained. This will typically entail a service of all landlord's appliances in accordance with manufactures instruction along with a visual inspection of the rest of the installation and a gas tightness test and will be undertaken at the time of the annual gas safety check with results recorded. All necessary remedial action will be undertaken. In the absence of manufacturer's instructions and as a minimum, this shall meet the requirements for effective maintenance outlined in the GSIUR and associated ACOP.
- 5.1.6 Communal systems, that is those non-domestic landlords gas installations serving multiple dwellings, will generally be subject to the gas safety check and maintenance activity described above on a six-monthly frequency. This is primarily because of the number of dwellings that would be impacted by a non-compliance or breakdown situation.
- 5.1.7 PA Housing will follow a defined access procedure in accordance with this policy and as detailed in the Management Plan where required. PA Housing will hold evidence to demonstrate that all reasonable steps have been taken to gain access including enforcement action where required. To support this PA Housing will commence its access at least 10 weeks prior to a gas safety check becoming due.
- 5.1.8 When an unsafe situation is identified, PA Housing will follow and monitor compliance with the procedure relating to unsafe situations.
- 5.1.9 PA Housing will undertake a push button test of the operation of any landlord's smoke, heat, and carbon monoxide detectors within the property at the time of the LGSR and record the results.
- 5.1.10 In addition, PA Housing will ensure that no gas fitting of a type that contravenes regulation 30 of the GSIUR is any room occupied or to be occupied as sleeping accommodation.
- 5.1.11 For tenanted properties, PA Housing will provide the tenant with a copy of the certificate within 28 days of a test. The exception to this is for communal systems serving multiple dwellings where a certificate may be displayed in a prominent position within the premises and provided on request rather than sent to each individual tenant.
- 5.1.12 As well as annually as defined above, PA Housing will complete a gas safety check and associated maintenance at the following times:
- Prior to a new letting with a LGSR being given to the incoming tenant on sign-up.

- Following the uncapping of a gas supply.
- At a mutual exchange.
- Following installation of new or replacement gas appliances.

5.1.13 PA Housing will maintain a Gas Specification to establish its technical requirements (including referencing to relevant legislation and standards) relating to the activities described above.

5.1.14 Amendments to GSIUR in 2018 gave landlords the flexibility to use an 'MOT' style approach to undertaking gas safety checks. In summary, this enables landlords to undertake the check during a defined period before it is due yet retain the anniversary of the previous expiry. PA Housing has not currently adopted this approach but will keep this under review.

5.2 Other Gas Installations

5.2.1 PA Housing's portfolio includes non-housing assets containing gas installations which are subject to GSIUR but not subject to the specific requirements of regulation 36 of for landlord's gas installations described above. Other gas installations under this policy will include all gas installations not identified as landlords gas installations.

5.2.2 All other gas installations shall be periodically inspected and serviced to ensure that they are maintained in a safe condition. This will be done in accordance with the manufacturer's instructions and the requirements of GSIUR and the results recorded. As a minimum, this will be undertaken annually and shall include:

- examination of the physical condition and safe functioning of appliance(s), installation pipework, ventilation, and any flue for deterioration.
- carrying out performance tests; and
- taking the necessary remedial action.

5.2.3 PA Housing will maintain a Gas Specification to establish its technical requirements (including referencing to relevant legislation and standards) in relation to the above.

5.2.4 PA Housing will maintain, follow, and monitor compliance with the procedure relating to unsafe situations where one is identified.

5.3 Gas work

All gas work will be undertaken by competent persons. Any person undertaking gas works hold a valid and current qualification and be registered with Gas Safe Register with a license number and ID. All work and materials shall comply with the requirements of GSUIR, manufactures instructions and the Gas Specification which establishes PA Housing's technical requirements (including referencing to relevant legislation and standards). This includes the checks that engineers will undertake after

working on gas appliances or pipework and the requirements for recording the outcomes of the same. PA Housing will follow and monitor compliance with the procedure relating to unsafe situations where one is identified.

Gas repairs will be undertaken in accordance with the repairs policy.

5.4 Void Properties and Capped Supplies

PA Housing will cap the gas supplies to void properties as soon as is reasonably practicable to manage the risk of damage or vandalism at void stage. There may be circumstances where this is not required, but this will be subject to a risk assessment. Uncapping will be followed by an LGSR as detailed in above.

PA Housing will remove and dispose of any tenant's gas appliances that are left at void stage.

Where a supply remains capped, PA Housing will inspect it annually.

5.5 Gas Escape or Suspected Carbon Monoxide

PA Housing will maintain a procedure relating to receiving a report of a gas escape, smell of gas or suspected carbon monoxide within the GSMP. This will involve the immediate referral to the Gas Emergency Service Provider and issue of initial safety advice.

5.6 Carbon Monoxide Detection

PA Housing's approach to installation of carbon monoxide detection will be documented with the GSMP.

5.7 Gas Planned Works

In addition to the general requirements relating to gas works above, PA Housing will ensure that for any gas planned works:

- Anyone appointed to undertake design or construction activities can demonstrate the necessary competence to discharge their responsibilities relating to gas safety.
- Request reasonable assurance that duty holders have demonstrated that resident safety can be assured during the works.
- Engage with residents on safety matters that affect them.
- Request reasonable assurance that duty holders have complied with the building regulations in relation to gas work where required
- Request reasonable assurance that there is an appropriate site inspection and sign-off programme in place for the stages of the work.

PA Housing will ensure that all necessary commissioning and installation certification and is completed and a copy of manufactures instructions are provided to the owner or occupier

PA Housing will maintain a procedure relating to any new gas installation to ensure that records and responsibilities can be updated.

5.8 Other Repairs, Maintenance and Planned Works

There is a risk that other repairs and maintenance activity unwittingly impacts gas safety. Owing to the volume and nature of repairs works it is not practicable to undertake specific risk assessments of all jobs. PA Housing will manage this risk by ensuring that R&M contractors (internal and external) have a general awareness of gas safety – in relation to flues and ventilation - to inform dynamic risk assessment when undertaking responsive repairs.

PA Housing will ensure that a competent person is consulted on the specification of planned and major works programmes where there is a reasonably foreseeable impact on gas safety.

5.9 Resident Commissioned Works

PA Housing will maintain a consent process for any resident commissioned works. Approval will not be unreasonably withheld, although consent may be refused or conditions imposed where appropriate.

Where unauthorised work with the potential to impact gas safety is discovered, PA Housing will take the appropriate action to remove or remedy. The cost of doing so may be recovered from the resident.

5.10 Management

PA Housing will:

- Implement a risk-based approach to the periodic inspection of communal areas to ensure areas containing gas equipment are locked and no visible signs of vandalism or damage exist.
- Maintain a clear staged access process to get access to properties to undertake the activities described above. This shall include enforcement action when required. PA Housing will proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.).
- Enforce resident responsibilities where required considering a balance of individual residents' rights with the need for effective, timely action where there is a risk to the safety of other residents.

5.11 Construction

There are detailed requirements on PA Housing as a Client during construction projects and these are considered elsewhere. However, in general PA Housing will ensure:

- It cooperates and shares information with stakeholders at key stages prior to and during construction.
- that the people it employs are competent to do the work they are undertaking.
- compliance with the building regulations and specific regulatory requirements imposed upon it.
- appropriate approvals are in place and that all information is handed to over to Operations prior to any occupation.

6. COMMUNICATION WITH STAKEHOLDERS

6.1 Internal

PA Housing will set up and operate an Health and Safety Committee (HSC) to co-ordinate and oversee the operational delivery of all compliance policies and management plans. The Terms of Reference of the HSC will be appended to each management plan once approved.

6.2 Residents

PA Housing will encourage gas safety by the following actions:

- Provide a copy of the LGSR in line with this policy (i.e., within 28 days of test) and to a relevant resident within 28 days when reasonably requested to do so.
- Periodically inform residents of the importance of gas safety and emergency procedures in the event of gas escape/suspected carbon monoxide, through the provision of information via website, newsletters, leaflets, and information at sign-up.
- Maintain a clear approach to gaining access to carry out works and be clear that enforcement action may be taken when it is necessary to do so.
- Maintain a clear complaints process and monitor and record complaints that indicate a risk to safety.
- Periodically communicate with Leaseholders and Shared Owners to remind them of the importance of undertaking periodic gas checks.

6.3 Staff

Communicate key gas safety advice to relevant staff through induction and refresher H&S training.

6.4 Gas Emergency Service Provider and Distribution Network Operator

Communicate with the relevant bodies regarding gas safety issues and connections to the gas distribution networks where required.

7. Monitoring and Assurance

7.1 Monitoring

7.1.1 The following Performance Indicators (PIs) and KPIs will be reported to the HSC, Executive Team or Board at the frequencies outlined in our Landlord H&S Compliance Strategy:

- Landlords gas installations with a satisfactory LSGR within its due date as a percentage of total assets with a landlord's gas installation.
- Other gas installations with a satisfactory periodic inspection and maintenance within its due date as a percentage of total assets with other gas installations.
- Number of assets where unsafe situations have been reported and the number adequately resolved.
- Number of safety occurrences in the period- including any gas safety incidents which posed a material safety risk and any external occurrence reporting (e.g., RIDDOR).

7.1.2 These PIs or KPIs will be reviewed periodically by the HSC and additional/ amended measures may be recommended.

7.1.3 Where appropriate, KPIs will include the total number of actions or buildings required and the total number within target as well as percentage figure.

7.1.4 Commentary will be provided for any properties or actions out of date to include the date they became overdue, days overdue, and the action proposed to bring them back into a compliant position. To provide additional context, commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

7.1.5 For landlords gas installations, commentary relating to any overdue requirements will confirm if they are at the appropriate stage of the access process.

7.1.6 A detailed PI suite will be defined within the Management Plans and monitored by Operations Teams.

7.2 Assurance

The following assurance activity will be undertaken:

- External checking independent of the Operational Teams to provide additional assurance around the accuracy of data and reporting. The approach will be documented within the Data Management Protocol and will include sample testing of the accuracy of data and the operation of controls. The outcomes will be reported to the HSC.

- Internal audit to provide independent assurance on the operation and effectiveness of controls. Frequency agreed as part of the **Internal Audit Programme** and reported to Audit and Risk Committee.
- Works based quality assurance to test the quality of work delivered. This will be at levels detailed within the GSMP and reported to HSC.

8. Competence

8.1 It is not possible to succinctly define competence requirements for all roles and activities outlined in this policy. In many areas competence will be assessed based on skills, knowledge and experience as opposed to a single qualification or standard. As defined above, PA Housing has a system of Directors evaluating competence within their areas of responsibility and Competent Person(s) are required to highlight the limits of the competence.

8.2 However, in relation to all gas work PA Housing will:

- Appoint a competent person internally or, if the skills do not exist internally, appoint an external competent person to provide retained advice and support in relation to gas safety.
- Ensure that it holds or it only commissions contractors who hold an appropriate registration with Gas Safe Register.
- Ensure that any employees undertaking gas works hold a valid and current qualification and are registered with Gas Safe Register with a license number and ID.
- Get reasonable assurance that any contractor undertaking gas work has relevant staff holding a valid and current qualification and registered with Gas Safe Register with a license number and ID.

8.3 Specific areas of competence are listed within the GSMP along with a procedure outlining the reasonable steps PA Housing will take to ensure the competence of those carrying out work who are not under its direct control.

9. Consultation

9.1 This Policy is based on legislative and regulatory requirements and as such consultation with customers has not taken place. There has been consultation with Teams within PA Housing.

10 Equality Impact Assessment

10.1 An Equality Impact Assessment (EIA) will be undertaken on this Policy. See the full EIA document for further details.

11. Policy Review

11.1 The Policy will be reviewed upon any change to legislation or major guidance documentation, and at least every 36 months (or earlier if deemed necessary through the Monitoring and Assurance Process).

12. Amendment Log/Version Control

12.1 Revision Detail/Record:

Date of Revision:	Record of Amendments:	Reason for Revision:	By Whom: Name and Title