

PA Housing

PA Housing GAS SAFETY POLICY

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Policy Owner

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Approved by

EMT

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PA 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 The key objective of this policy is to describe how PA will manage the risk from gas appliances and installations so far as it 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 undertakes.
 - Using competent staff and contractors.
 - Communication internally and with residents 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, including gas pipework, landlord appliances, and flues.
- 1.3 PA will seek to comply with all current and relevant statutory obligations, including but not limited to the following where applicable:
- The Gas Safety (Installation and Use) Regulations (1998) (GSIUR).
 - Gas Industry unsafe situations procedure 2024
 - IGEM/UP/1A
 - IGEM/UP/1B
 - COCN1
 - TPCP 1A
 - TPCP 1B
 - The Building Regulations 2010.
 - The Housing Act 2004.
 - Health and Safety at Work etc. Act 1974.
 - Landlord Tenant Act 1985
- 1.4 In addition, PA must meet the requirements of both the Regulator for Social Housing's (RSH) Homes Standard and the requirements of the Care Quality Commission (CQC).
- 1.5 Our primary objective is to ensure that residents, contractors, staff, and visitors remain safe in our premises. 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 organization.

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 **Finance Risk and Audit Committee** will be responsible for ensuring that the PA Board receives the assurance it requires.

The **Director of Compliance** 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 **Executive Director of Asset Management** will take overall responsibility for planning and implementing the assurance activities described in this Policy and for the effective upward reporting of performance. The **Executive Director of Asset Management** will attend the Finance Risk & Audit committee meeting and ensure that any issues arising from assurance activities are discussed, and that areas of non-performance are reported and escalated where required.

All **Directors within the Asset Directorate** 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 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 resident to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement actions 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 acknowledges that to meet its obligations it must maintain a robust approach to identifying the assets and components for which it has responsibility. PA 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 has no responsibility but has an interest (e.g., a block managed by others but PA 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 including 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 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.

4.1.4 Where PA 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 will write to the responsible person on an annual basis asking for written confirmation that:

- 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 has been informed of any material issues relating to residents' health and safety.

Where PA 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.

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

4.1.6 PA aims to provide evidence of any compliance activity with documents or certification. Therefore, any documentation and certification are subject to the relevant data control validation process. Data on gas properties is being

validated through:

- Property reconciliation report being run monthly
- Property Landlord gas safety record issue dates reconciled weekly
- Property equipment data will be reconciled quarterly throughout 2025/26
- Data validation and gas reconciliation exercise is being undertaken with Central Data Services Provider for Britain's gas market

5. Key Activities to Manage Risk

5.1 Landlords Gas Installations

- 5.1.1 Landlords gas installations will include all relevant gas fittings in accordance with regulation 36 of GSIUR and other relevant statutory regulations. 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 in relation to the landlord's gas installations: annual safety checks on gas appliances and flues, and effective ongoing maintenance.
- 5.1.3 PA will undertake a gas safety check on all the 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 safety check. This will be carried out by a Gas Safe registered engineer with appropriate qualifications.
- 5.1.4 Whilst not the responsibility of PA, 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 manufacturer's instruction, GSIUR and other relevant statutory regulations, along with a visual inspection of the rest of the installation and a gas tightness test 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 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 system failure.

- 5.1.7 PA will follow a defined access procedure in accordance with this policy and as detailed in the Management Plan. PA will hold evidence to demonstrate that all reasonable steps have been taken to gain access, including enforcement action where required. To support this PA 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 will follow and monitor compliance with the procedure relating to unsafe situations according to the Gas Industry unsafe situations procedure.
- 5.1.9 PA 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 will ensure that no gas fitting of a type that contravenes regulation 30 of the GSIUR, and other relevant statutory regulations, is in any room occupied or to be occupied as sleeping accommodation.
- 5.1.11 For occupied properties, PA will provide the residents with a copy of the gas safety certificate within 28 days of the 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 resident.
- 5.1.12 As well as annually as defined above, PA 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 gas appliances.
- 5.1.13 PA 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 has not currently adopted this approach but will keep this under review.

5.2 Other Gas Installations

- 5.2.1 PA's portfolio includes unoccupied areas that contain gas installations which are subject to GSIUR but not subject to the specific requirements of regulation 36.
- 5.2.2 All gas installations owned by PA shall be periodically inspected and serviced to

ensure that they are maintained in safe condition. This will be done in accordance with the manufacturer's instructions and the requirements of GSIUR and other relevant statutory regulations, 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 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 will maintain, follow, and monitor compliance with the procedure relating to unsafe situations where one is identified.

5.3 Gas work

All gas work instructed by PA will be undertaken by competent people. Any person undertaking gas work must hold a valid and current qualification and is registered on the Gas Safe Register with a license number and ID. All work and materials shall comply with the requirements of GSUIR, manufactures instructions and the PA's Gas Specification. PA will follow and monitor compliance with the procedure relating to unsafe situations where one is identified.

Gas repairs will be undertaken in accordance with PA's Repairs policy.

5.4 Void Properties and Capped Supplies

PA will cap the gas supplies to void properties as soon as it 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 above.

PA will remove and dispose of any resident installed gas appliances when the property is empty.

Where a gas supply has been capped, PA will inspect it annually to check it is safe and has not been uncapped.

5.5 Gas Escape or Suspected Carbon Monoxide

PA will maintain a procedure relating to gas escape, smell of gas or suspected carbon monoxide, within the GSMP. If anyone suspects a gas leak or smells gas, they should call the National Gas Emergency Service on 0800 111 999. This number is free to call and available 24/7. PA will also ensure that Gas Contractor attends as detailed within GSMP.

5.6 Carbon Monoxide Detection

PA provides a carbon monoxide detector in all homes that contain a gas supply. PA's approach to the installation of carbon monoxide detection is documented within the GSMP.

5.7 Gas Planned Works

PA will ensure that for any planned gas works:

- Anyone appointed to undertake design or construction activities can demonstrate the necessary competence to discharge their responsibilities relating to gas safety.
- Anyone appointed to undertake design or construction activities holds a valid and current qualification and is registered on the gas safe register.
- Request reasonable assurance that duty holders have demonstrated that resident safety can be assured during the work.
- 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, providing copies of Risk Assessments and Method Statements.
- Request reasonable assurance that there is an appropriate site inspection and sign-off programme in place for the stages of the work.

PA will ensure that all necessary commissioning and installation certifications are completed, and a copy of the manufacture's instructions are provided to the owner or occupier.

PA will update its assets database following any new gas installation.

5.8 Other Repairs, Maintenance and Planned Works

There is a risk that other repairs and maintenance activity impacts gas safety. PA 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 will ensure that a competent person is consulted on the specifications of planned and major work which may impact on gas safety.

5.9 Resident Commissioned Works

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

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

5.10 Management

PA 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 non-access process. This shall include tenancy enforcement action if required.

6. COMMUNICATION

6.1 Residents

PA will encourage gas safety by the following actions:

- Provide a copy of the LSGR in line with this policy within 28 days.
- Periodically informs residents of the importance of gas safety and emergency procedures in the event of gas escape/suspected carbon monoxide, through our website and newsletters.
- Maintain a clear approach to gaining access to carry out work 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.

6.2 Staff

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

6.3 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

7.1.1 The following KPIs will be reported to the Investment Committee and the PA Board at each meeting cycle.

- Landlords gas installations with a satisfactory LSGR within its due date as a percentage of total assets with a landlord's gas installation.
- Number of properties without valid gas safety certificates where the legal escalation process has been followed.

7.1.2 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.

7.1.3 For landlords gas installations, commentary relating to any overdue requirements will

confirm if they are at the appropriate stage of the legal access process.

7.2 Assurance

The following assurance activity will be undertaken:

- 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 Finance Risk and Audit Committee.

8. Competence

8.1 PA 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 on the Gas Safe Register.
- Ensure that any employees undertaking gas work 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.

8.2 Specific areas of competence are listed within the GSMP along with a procedure outlining the reasonable steps PA 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 residents has not taken place. There has been consultation with Teams within PA.

10. Policy Review

10.1 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).