



Gas Safety Policy

Approval date: September 2017
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This policy applies to

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| <input checked="" type="checkbox"/> Link Group | <input checked="" type="checkbox"/> Link Housing | <input checked="" type="checkbox"/> Link Living | <input checked="" type="checkbox"/> Link Property |
| <input checked="" type="checkbox"/> Horizon | <input type="checkbox"/> Larkfield | <input type="checkbox"/> West Highland | <input type="checkbox"/> Lintel Trust |

Policy Summary

The purpose of this policy is to provide a clear unambiguous statement of the organisation's policy on gas safety in domestic and commercial buildings owned and managed by Link Group. This policy is of vital importance in ensuring the health and safety not just of people who live in Link's properties, but also, those who live in the immediate area, work in, or visit their homes. As a landlord, Link has a legal responsibility to ensure the safety of its tenants in properties where there are gas installations and appliances. This policy sets out how Link will fulfil these legal requirements. Compliance with Gas Safety (Installation and Use) Regulations 1998, wider legislation and current best practice means that our gas safety responsibilities extend beyond servicing, maintenance, installation and repairs into a much wider role. Fostering a positive attitude amongst tenants towards gas safety is important in preventing incidents, as is working effectively with partners and external organisations to ensure that residents have access to information and guidance on gas safety. The implications of neglecting these responsibilities are high; fire, explosion and carbon monoxide poisoning can all occur as a result of neglect and can all have fatal consequences.

Equalities

The operation of this policy will be delivered in accordance with Link Group's Equality and Diversity Policy. During the production of this policy no issues were raised which would conflict with the Equality, Diversity and Inclusion Policy.

Privacy

It was identified during the production of this policy that incident reporting regulations may require personal data to be gathered and stored. All information collected will therefore be managed in accordance with Link Group's Data Protection Policy.

Policy Owner

Director of Development and Asset Management

Approved by

Link Group Board

1. INTRODUCTION

Link is one of Scotland's leading housing, regeneration and support organisations, providing homes to over 6,800 families and individuals in 26 Scottish Local Authority areas. We are also responsible for 12 sheltered housing complexes and 3 offices across Scotland.

Over 93% of those properties have gas appliances and Link is responsible for ensuring that a Landlord's Gas Safety Inspection is undertaken within 12 months of the previous inspection or installation of a new appliance in each of those properties. Annually we are developing an additional circa 300 new properties, predominantly with gas central heating, and have a programme for replacing inefficient electric heating with highly efficient gas heating in existing homes.

The policy also extends to boiler replacement, gas central heating installation, gas pipe work, servicing, maintenance and flues in all properties where Link is the landlord or responsible organisation for ensuring all gas appliances are tested in line with current gas safety legislation. This includes properties added as a result of building new homes or individual/multiple properties purchased by Link periodically and Link offices where domestic type boilers are installed providing heating and hot water to specific areas of the building in place of a single commercial type boiler. This type of configuration is evident in Links Falkirk Office, Watling House.

With the exception of properties managed by PSL, this policy does not apply to any gas appliances, pipe work or installations not wholly owned by Link, this includes shared ownership properties and tenant's own appliances, e.g. gas cookers.

Link Private Sector Leasing (PSL) is a trading name of Link Housing Association and is the management agent for the City of Edinburgh Council PSL contract. There are around 1400 properties leased from the private rented sector for use as temporary accommodation.

Where commercial gas boilers or gas appliances are installed in plantrooms, basements or other ancillary buildings supplying heat and hot water to residential properties owned by Link Group, Link will ensure that the terms of this policy are applies to these gas appliances in all respects.

2. PRINCIPLES

The following principles govern the operation of this policy:

- be clear and understood by all employees
- be fair, equitable and non-discriminatory
- reflect the needs of Link's diverse organisation
- reflect statutory requirements and best practice
- be flexible and adaptable to changing needs

Link will comply with all relevant legislation, performance standards or any targets set down by the Scottish Housing Regulator in terms of gas servicing.

In terms of gas safety responsibilities, the following information is not an exhaustive list of legislation and guidance. Instead, it is a reference point, signposting to those pieces of legislation and guidance that are most relevant to this policy.

- The Health and Safety at Work Act 1974;
- The Gas Safety (Installation & Use) Regulations 1998;
- The Gas Industry Unsafe Situations Procedure;
- Right to Repair – Housing (Scotland) Act 2001;
- Gas Safety (Management) Regulations 1996 (as amended);
- Gas Appliances (Safety) Regulations 1995;
- Building Standards (Scotland) Regulations 2014;
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013;
- Construction (Design and Management) Regulations 2007;
- Corporate Manslaughter Act 2007
- Housing (Scotland) Act 2014
- Section 19 off the Housing (Scotland) Act 2006

3. OBJECTIVES

To meet all legal and regulatory obligations and also ensure best practice is followed in relation to gas safety, the aims of the policy are to:

- Keep the general public, tenants and employees safe from danger
- Encourage tenants to participate in the continuous improvement of the gas servicing and repairs service, providing a variety of opportunities for involvement
- Educate and inform tenants on the safe use of appliances within their homes
- Raise resident and staff awareness of carbon monoxide and gas safety including recognising the symptoms of CO poisoning and the procedure to follow if it is suspected
- Ensure that all procedures relating to the Gas Safety Policy support the fair treatment of all tenants with respect to their different needs, circumstances and lifestyle.
- Link will ensure that it fulfils its legal and regulatory obligations relating to gas safety by:
 - Performing an annual gas safety inspection in every home where gas appliances are present within 12 months of the anniversary of the previous inspection or installation date
 - Maintaining robust procedures and safe systems of work that aim to prevent the release of carbon monoxide from domestic appliances and

- flues and minimise the risk of accidental damage to pipework and the subsequent release of natural gas
 - Maintaining emergency procedures to effectively manage any situation if such a release occurs
 - Taking action on any issues raised from the annual gas safety inspection within appropriate timescales
 - Monitoring installations and repairs to gas appliances carried out by Link's contractors
 - Maintaining gas safety records on all properties; ensure a copy of the Landlord's Gas Safety Record is issued to the existing or new tenant within 28 days of the inspection, store the Landlord's Gas Safety Record on file for a period of 2 years.
 - Operating and maintaining a robust reporting procedure within the organisation
 - Ensure that audit trails exists in the gas safety policy and procedures; Making it as easy as possible for tenants to arrange an appointment for annual gas safety inspections, maintenance, repair, installation and upgrade works
- Ensure that the risk of danger to residents, their neighbours and visitors and staff is minimised by use of robust procedures when:
 - Empty homes are let;
 - Properties become void;
 - Access to a property for the annual gas safety inspection cannot be gained;
 - Unsafe appliances and installations are identified, and
 - Tenants are to be found sleeping in the same room as an open-flued gas appliance.
- Annual testing of CO and smoke alarms in conjunction with annual gas safety inspection in every Link owned and PSL managed property with a gas appliance
- Ensure the installation of a CO detector in every habitable room containing a gas appliance or flue connected to a gas appliance.

4. APPROACH AND METHOD

Day to day responsibility for the operation and monitoring of this policy lies with appropriate Directors and Managers of the Link group of companies. All relevant employees have a responsibility to ensure that the policy is applied as instructed.

4.1 Individual roles and responsibilities

The Chief Executive must:

- Monitor through Directors the implementation and effectiveness of the Gas Safety Policy.

The Director of Development and Asset Management must:

- Ensure that an awareness of gas safety is promoted throughout the directorate
- Ensure that line managers have the tools and resources necessary to encourage and develop safe working practices and attitudes towards gas safety and to deliver appropriate training when a need is identified

Ensure that all managers who have a role in ensuring the Gas Safety Policy is implemented are aware of their responsibilities and the requirements as set out in the policy.

The Asset Planning and PSL Manager must:

- Ensure that the requirements of the policy are communicated to all of their staff and reinforce such communication on a regular basis
- Ensure that all appropriate staff receive adequate gas safety awareness training and are encouraged to develop and promote safe working practices and attitudes towards gas safety.

The Housing Services and PSL Manager must:

- Ensure that the requirements of the policy are communicated to all of their staff and reinforce such communication on a regular basis
- Ensure that all staff receive adequate gas safety awareness training and are encouraged to develop and promote safe working practices and attitudes towards gas safety.

The Trade Operations and PSL Manager must:

- Ensure that the requirements of the policy are communicated to all staff and operatives and reinforce such communication on a regular basis
- Ensure that all appropriate staff and operatives receive adequate gas safety awareness training and are encouraged to develop and promote safe working practices and attitudes towards gas safety.

The Programme Management Officer and PSL Compliance Administrator must:

- Assist the Asset Planning Manager to develop policies, procedures and safe working practices when necessary to enable Link to meet their obligations under the Gas Safety (Installation and Use) Regulations 1998

- Monitor the Gas Safety Policy and related procedures through line management to ensure compliance and report to the Asset Planning Manager on a regular basis
- Work closely with the Directors and Managers to ensure safe working practices across the organisation in relation to gas safety
- Communicate with other teams across the organisation as necessary to ensure continual communication with regards to gas central heating installations, gas servicing, repairs and appliance certification issues;
- Keep up to date with current and proposed gas safety legislation
- Monitor reports to ensure that we audit a minimum of 10% of all gas work and documentation by post-inspection to ensure the competence of individuals
- Ensure this policy and related procedures are followed
- Issue each tenant with a copy of the Landlord's Gas Safety Record within 28 days of the inspection/Installation
- Issue a copy of the Landlord's Gas Safety Record to each new tenant within 28 days of the change of tenancy
- File and store all Landlords Gas Safety Records for a minimum period of 2 years
- Ensure monthly updates on the gas servicing programme are reported to Directors through the board report
- Communicate with other teams across the organisation as necessary to ensure continual communication with regards to gas central heating installations, gas servicing, repairs and appliance certification issues
- Ensure that all persons or contractors carrying out gas works are trained and competent to do so and are GasSafe registered.

4.2 ENFORCEMENT

The annual gas safety inspection is a responsibility that Link must carry out to fulfill its legal duties as a landlord (or property owner in the case of its offices) under Regulation 36 of the Gas Safety (Installation and Use) Regulations 1998.

Link must take all reasonable steps to carry out the annual gas safety inspection. In order to ensure that such steps are taken consistently with all tenants, Link will follow robust procedures to encourage tenants to arrange an appointment for their annual gas safety inspection.

Link will also ensure that tenants are provided with relevant information highlighting the risks of not having the annual gas safety inspection. This will include participation in CO awareness campaigns, Tenant Newsletter, Tenant Handbook, Gas Servicing Information Leaflets and personal education.

4.3 ACCESS

A 4 stage process of communication is in place to gain access to tenanted properties and carry out the Annual Gas Safety Inspections. The 'Stage 4' intimates that access

to the property will be forced, if necessary, to carry out the Landlord's Gas Safety Inspection, unless access is provided by the tenant before the anniversary date.

PSL tenants who do not permit access will be notified in writing by means of a hand delivered letter giving 24 hours notice that access by keys or forced entry will be affected following any day in accordance with section 6.2 of their tenant agreement (which relates to emergency repairs).

4.4 CONTRACTORS

Contractors will not be engaged unless they are GasSafe Registered and able to demonstrate competence in gas safety, experience in this work and that no enforcement / legal action has been taken against them with regard to non-compliance.

5. MONITORING, PERFORMANCE MEASUREMENT AND REPORTING

The performance on our compliance with The Gas Safety Installation and use Regulations 1998 with regards to Regulation 36 will be reported to Link Group Board on a quarterly basis.

The report will include;

- Detail of the number of properties which require a Gas Safety Inspection during the reporting period.
- The number of properties where a Gas Safety Inspection was carried out.
- The number of properties which require a current Landlord's Gas Safety Certificate in place and those which do or do not currently have one.
- Analysis of Stage 4, forced access visits.
- Report on those properties which failed to have a Gas Safety Inspection carried out by the due anniversary date.

6. COMPLAINTS AND APPEALS

Link Group welcomes complaints and positive feedback, both of which provide information which helps us to improve our services. We use a complaints handling procedure (CHP) developed by the Scottish Public Services Ombudsman (SPSO) and the Scottish Housing Regulator.

The CHP allows for most complaints to be resolved by front line staff within a 5 day limit (first stage), or if the complaint is complex, a detailed investigation will be made by a manager within a 20 day limit (second stage). At the end of the second stage our response will be made by a Director. If the complainer remains dissatisfied he / she may then refer the matter to the SPSO.

The SPSO does not normally review complaints about our factoring service. If a factoring customer is dissatisfied after using the CHP, the complaint may be referred to the Homeowners Housing Panel.

Anyone receiving care or support services from us has the right to complain either direct to the Care Inspectorate or to us. At each stage Link will advise the

complainer how the complaint should be taken forward, and advise which agency will be most appropriate to consider the case.

7. POLICY AVAILABILITY

This policy is available to the public on the Link Group website.

Copies are also available on request and free of charge from Link. A summary of this policy can be made available in a number of other languages and other forms if required

8. POLICY REVIEW

Link undertakes to review this policy regularly with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice.

The review will be coordinated by Link Group's Strategy & Business Support Team.

Appendix A - GLOSSARY

Annual Gas Safety Inspection

An annual gas safety inspection is an inspection of fixed gas appliances, flue systems and gas pipework in a home.

Landlords have a legal duty to every tenant to carry out an annual gas safety inspection to inspect all gas appliances, flue systems and pipework in the tenant's home that are the landlord's responsibility.

The annual gas safety inspection must be carried out by a GasSafe registered engineer who holds current ACS qualifications for those appliances and systems to be worked on.

An engineer is required by law to disconnect from the gas supply any appliances found to be in an unsafe condition.

At the end of a gas safety inspection, the property must be left in a safe and habitable condition

Carbon Monoxide

Carbon monoxide is a colourless, odourless and tasteless gas.

It is highly toxic and carbon monoxide poisoning is the most common type of fatal poisoning in many countries.

Carbon monoxide alarms are fitted in all our properties containing a gas appliance or flue.

The device will sound an alarm if a high level of carbon monoxide is detected.

These are inspected annually at the Landlord Gas Safety Inspection by the gas maintenance contractor and replaced as and when required.

The Consumer Product Safety Commission says that "carbon monoxide detectors are as important to home safety as smoke detectors are", and recommends that each home should have at least one carbon monoxide detector.

Contractor

A person, business or corporation which provides goods or services to another entity under terms specified in a contract

CP12

When an annual gas safety inspection has been completed the engineer will issue the tenant with a copy of the CP12.

This is also known as the landlord's gas safety certificate or record.

Both the tenant and landlord keep a copy of the CP12.

Flue

A flue is a duct, pipe, or chimney for conveying exhaust gases from a fireplace, furnace, water heater, boiler, or generator to the outdoors. It is designed to release noxious, potentially harmful, gases into the atmosphere.

Gas Appliance

"Gas appliance" means any appliance designed for use by a consumer of gas for heating, lighting, cooking or other purposes for which gas can be used

Gas Installation Pipework

"Gas installation pipework" here refers to pipework, valves, and regulators.

Gas Safe Register

To carry out work on gas installations and appliances safely and legally, engineers in Great Britain and the Isle of Man must be on the Gas Safe Register.

'Gas Safe' replaced the CORGI (Council for Registered Gas Installers) register on 1st April 2009.

Engineers who are Gas Safe registered now display a yellow 'Gas Safe Register' triangle.

The sole focus of the register is on improving gas safety and it exists to protect people from dangerous gas work.

Engineers must also be qualified on all gas appliances, pipework and flues that they work on. They must hold a current ACS qualification for each one.

Health and Safety Executive (HSE)

A non-departmental public body in the United Kingdom

The HSE is responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare.

The HSE is also responsible for research into occupational risks in England and Wales and Scotland.