

SA/06 -

Gas Safety Policy

PN:09

“Our policies embed our culture, establish boundaries and outline our operating expectations. They have been agreed by our Board(s) as best practice documents for the Group’s decision making.”

1. Policy Statement

ateb Group Limited is committed to maintaining the Health and Safety of employees, customers, and members of the public. The Group recognises the potential health risks associated with gas used for fuel in premises and in housing. The Group will take all reasonable steps to ensure that customers, employees, and members of the public are not put at risk from the effects of gas or carbon monoxide at premises owned and managed by the Group.

The Group takes its duties, under the Gas Safety (Installation and Use) Regulations, Health and Safety at Work Act and the Management of Health and Safety at Work Regulations, seriously and will ensure that appropriate policies and processes are in place to manage the duties owed to customers, employees and other stakeholders.

Approval Date	Lead Contact	Review Date
30/07/2020	Maintenance and Compliance Manager	July 2023

Policy Contents

1. Policy Statement
2. Principles
3. Responsibilities
4. Control
5. Links to other documents

2. Principles

Potential risks associated with gas as a fuel are significant and include fire/explosion and carbon monoxide poisoning, due to incomplete combustion arising out of poor or irregular maintenance and incorrect installation of appliances and systems.

The purpose of this document is to demonstrate ateb Group Limited's commitment to ensuring its employees, tenants, and the public, are not knowingly exposed to any risks that would affect their safety. The processes, safe systems of work and documents covered by this Corporate Policy will provide guidance and specific instructions for all Group employees and external contractors, whilst undertaking duties in relation to gas work. This is with the aim of satisfying the legal duties of the current Gas Safety (Installation and Use) Regulations. The work as detailed within contract specifications may also include other aspects which will assist the Group in satisfying its duty of care to its tenants, employees, and the public.

This policy applies to all ateb Group properties, domestic rented properties, domestic housing stock and commercial responsibilities, and all work undertaken in these properties on the Group's behalf.

This policy will apply to all Group employees and contractors undertaking gas work on the Group's behalf and anyone likely to be put at risk from work on those properties.

Gas work contract specifications as compiled will include the Health and Safety Policy and the operational processes of the Group.

Gas Safety (Installation and Use) Regulations 1998 as amended

The above regulations, supported by their Approved Code of Practice (ACOP), stipulate exactly how gas safety will be achieved. The Group recognises the importance of its duty under these regulations and has put processes in place to meet these. The fundamental requirements of the Regulations are noted in the section below:

- Installations, appliances and their flues shall be installed in such a way that they will be safe to use, and installations, appliances and their flues shall be maintained in a safe condition to prevent risk of injury to any person (in lawful occupation). This also applies to employers or self-employed persons in respect of places of work under their control.
- Appliances and flues, relevant to those appliances in premises which are let to ateb customers, shall be checked for safety at intervals of no more than 12 months. A certificate (referred to as the Landlord's Gas Safety Record and abbreviated to LGSR), confirming the findings must be given to the tenant or responsible occupier.
- A copy of the LGSR will be given to each existing tenant of premises to which the record relates within 28 days of the date of the check; and a copy of the last record made in respect of each appliance or flue will be given to any new tenant of premises to which the record relates before that tenant occupies those premises.
- A copy of the record may instead be prominently displayed within certain premises.
- Landlords shall ensure that the work undertaken on their behalf is done by an employee of the Health and Safety Executive's (HSE) "Approved Class of Persons". For the time being the approved class of person is one currently registered with the Gas Safe Register (GSR).

Detail as to how we meet the individual requirements are provided in the following paragraphs.

The Group Recognises that its duty under the Regulations is an absolute duty and it cannot be resolved from meeting that duty due to cost, technical or other similar issues.

Regulations 36 – Duties of Landlords

In summary, the above section of the Gas Safety Regulations places two duties upon a landlord, those being:

1. to maintain all gas appliances, flues, and gas installations; (appliances that the tenant cannot legally remove); and
2. to undertake an annual safety check of gas appliances and flues and produce documents to support.

To meet these duties, the Group has identified and included all applicable properties in the Group's annual LGSR plan with a unique property reference number that links to the Group's Compliance, Housing and Property Management systems.

Appliances, flues, and pipework systems owned by the Group are serviced and checked for gas safety at intervals of no more than 12 months from the previously recorded Gas Safety check/service date.

Where the Group has shared ownership of a property, and the lease is for longer than 7 years, the Group does not have landlord's duties under the GSIUR. Currently all Group shared ownership lease arrangements are in excess of 7 years.

In situations where a lease is shorter than 7 years then the Group will be classified as a landlord under the GSIUR.

Where Rent to Own – Wales scheme customers have assured shorthold tenancies the Group retain landlord's duties under the GSIUR up until properties are purchased by the customer outright.

Where the Group leases or contracts housing management responsibilities for a property to a third-party organisation the agreement will clearly state who is responsible for the associated duties under the GSIUR, specifically who is responsible for carrying out the maintenance and safety check duties and keeping of associated records. Equally, the same applies where the Group leases a property from a third-party organisation or carries out housing management responsibilities for a third party. The agreement will stipulate which party is responsible. The Group has assumed landlord responsibilities for all current third-party lease arrangements.

Tenant Owned Appliances

The Group will service and check the safety of all appliances and flues that the tenant cannot legally remove which includes ateb owned purpose provided gas installation pipework and flues that tenant owned appliances are connected to.

As a minimum the safety check will include, but will not be limited to, those checks detailed in Regulation 26(9) which includes examining the:

- a) the effectiveness of any flue;
- b) the supply of combustion air;
- c) its operating pressure / heat input, or where necessary both;
- d) its operation so as to ensure its safe functioning.

And forthwith taking all reasonably practicable steps to notify any defect to the responsible person, and where different, the owner of the premises in which the appliance or flue is installed, or where neither is reasonably practicable, the supplier of gas to the appliance. In respect of tenant owned appliances not connected to flues owned by the Group, we accept no responsibility for the appliance itself but a visual risk assessment for safe use will be undertaken.

Health and Safety at Work etc. Act 1974

There are two sections of the Health and Safety at Work Act 1974 relevant to this context of gas safety:

Section 2 (1)

“It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees”.

This means that we will maintain, so far as is reasonably practical, the workplace in a condition such that it is safe and does not put employees at risk.

Section 3 (1)

“It shall be the duty of every employer to conduct his undertaking in such a way so as to ensure, so far as reasonably practicable, that persons not in his employment, who may be affected thereby, are not thereby exposed to risks to their health or safety”.

This means that we will ensure, so far as is reasonably practicable, our housing stock (its business activity) does not cause harm to its tenants/customers (non-employees).

The Management of Health and Safety at Work Regulations 1999

The above regulations, in general terms, require us to:

- Assess the risk of Health and Safety of all employees and to anyone who may be affected as a result of work undertaken.
- Endeavour to provide comprehensive information, instruction, training, and supervision with the aim of ensuring, so far as is reasonably practicable, the health and safety at work of every employee or person so affected.
- Risk assess all work activities.

We have incorporated the above requirements into our gas safety processes to ensure, in so far as is reasonably practicable, the safety of our employees when carrying out their duties under this policy.

3. Responsibilities

Group

This is a Group Policy which applies to all companies within the Group structure.

All Companies within the Group are responsible for ensuring the policy is available to their customers, stakeholders, and employees and for ensuring appropriate training, support and guidance is given on its application and use.

Board of Management

Responsibility for gas safety lies ultimately with the Group's Board of Management. They are ultimately responsible for ensuring our customers and employees are safe in their homes and places of work. The Board satisfies this responsibility by delegating duties to the Chief Executive who is responsible for ensuring that adequate resources are made available to enable the objectives of this policy to be met.

Key persons

Group Chief Executive

Key responsibilities:

- Effective operation of the Corporate Gas Management Policy across the Group as a whole.
- Adequate resources are made available to both develop and implement appropriate procedures.
- Enable responsibilities to be effectively delegated

Executive Director (Customer) and Executive Director (Property)

Key responsibilities:

- Interface with Corporate Group and Safety Team.
- Reporting to Chief Executive.
- Ensure the Gas Safety Policy for the Group's domestic rented accommodation, commercial responsibilities and shared spaces is applied, and gas safety management systems and procedures are in place, maintained, monitored, and reviewed.

Maintenance & Compliance Manager

Key responsibilities:

- Management of gas related performance and monitoring.

- Reporting on performance corporately.
- Responsible for the implementation of the policy and to ensure sufficient resources are available.
- Responsible for ensuring the ateb compliance process maps PS 01, 02 and 03 are always appropriate to the achievement of the GSIUR.
- Financial provision and budget responsibility for repairs.
- Monitor and report on gas safety compliancy.
- Plan and deliver the LGSR programme.
- Ensuring everyone undertaking duties in accordance with regulation 36 – duties of landlords, are suitably qualified and trained.
- To monitor the quality of services provided by contractors and operatives ensuring compliance with contract conditions.
- Provide technical advice across the Group as required.

Effective management of:

- Reporting problematic access.
- Escalating identified vulnerability issues.
- Mutual exchanges and void property gas work.

Customer Support Manager

Key responsibilities:

- Access escalation case management.
- Vulnerability case management.
- New tenant handover (certification).

Property Services Manager

Key responsibilities:

- Responsible for the implementation of the policy across development and planned maintenance projects.
- Dissemination of information and certification from development and planned maintenance teams.
- Ensuring all new properties are only accepted with full and complete certification in accordance with this policy.
- Financial provision and budget responsibility for development and planned maintenance.
- To monitor the quality of services provided by contractors ensuring compliance with contract conditions.
- Provide technical advice across the Group as required.

Health & Safety Adviser

Key responsibilities:

- Carry out Health and Safety audit inspections.
- Report any gas work related accident/incident or failures to comply with the health and safety policy by either employer or employee.
- Submit recommendations in relation to gas policy to the Executive Management Team and Board of Management if necessary.

Maintenance & Compliance Co-ordinator

Key responsibilities:

- Responsible for liaison with staff, customers, contractors, suppliers, and other stakeholders.
- Planning of works in accordance with compliance process maps PS 01, 02 and 03.
- Provision of gas related performance and monitoring data.
- Monitoring Gas Safe Registration and Accredited Certification Scheme (ACS) expiry / renewal dates.
- Verification of contractors and operatives.
- Ensuring the integrity of certification, reviewing, and updating GSR records on the database.
- To monitor the quality of services provided by contractors and operatives.
- To recommend specification/contract changes.
- Provide technical advice across the Group as required.
- Administration functions.
- Responsible for ensuring property and appliance lists are updated.

Mechanical & Electrical Supervisor

Key responsibilities:

- Responsible for the **Heating & Plumbing Engineering (HPE) Team**.
- Delivery of works in accordance with compliance process maps PS 01, 02 and 03.
- Provide technical advice across the Group as required.
- Liaison with staff, customers, contractors, suppliers, and other stakeholders.

All Managers & Employees

Key responsibilities:

- Responsible for attending training opportunities, reading the policy, following processes, safe systems of work, method statements and reporting any concerns to supervisors and managers.
- Leadership responsibilities, in line with the ateb Vision, within the boundaries of this policy, and report any accidents / incidents / near misses and operational concerns to supervisors and managers.

Customers

Key responsibilities:

- Responsible for providing access, in line with their tenancy agreement obligations, for the inspection, servicing, repair and installation of gas installations and flues in their homes.
- Reporting any concerns to their tenancy & community management representative.

Other Stakeholders

Key responsibilities:

- Contractors to comply with any contract specifications provided by the Group in carrying out gas safety works.
- Third party quality assurance gas auditing partners to provide agreed services in line with ateb contract specifications (see Section 5. Quality Control Process).
- Gas Safe Register undertake monitoring inspections, of all businesses on the register to ensure they are applying gas competence and investigate gas safety complaints from the public.

4. Control

The **Maintenance & Compliance Manager** is the lead contact for this policy and for ensuring it remains operationally effective. This policy is a dynamic document and will be amended as required following service reviews or changes to the operating environment.

The Maintenance & Compliance Manager will review this policy every 3 years. Changes to legislation or regulatory requirements will mean a review may need to take place sooner. Board approval will be obtained before any amendments are published and employees will receive refresher training as applicable.

5. Links to Other Documents

The requirements for a robust Gas Safety Management system and Maintenance system are clearly defined in Gas Safety (Installation and Use) Regulations, the Management of Health and Safety at Work Regulations together with the Health and Safety at Work Act and other regulations made under this Act.

To safely manage these and other regulations the Group will ensure that in addition to this policy the following policies/procedures/processes are adopted across the Group and are continuously reviewed and amended as required.

Specific Contractor Instruction

This is detailed within stage 1 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map and its purpose is to provide guidance and specific instructions for all Group employees and external contractors, whilst undertaking gas work on behalf of the Group. This is with the aim of satisfying the legal duties of the current (Gas Safety (Installation and Use) Regulations).

Gas Work Specifications – ateb Group Limited to Main Contractor

All Contractors undertaking works in connection with this policy must have a signed and in date contract including a complete specification of works in accordance with the relevant gas safety regulations. Where the contractor identifies gaps or errors in the specification, they are to immediately inform ateb. No contractor should undertake gas safety work without an in-date contract with appropriate specification requirements. The work detailed within specifications may also include other aspects that will assist the Group in satisfying its duty of care to its tenants.

Gas Work Specifications – ateb Group Limited employees

Specification for the in-house provision of gas contract works will be provided through Process Maps, safe systems of work (e.g. method statements) and procedural guidance documentation.

Process for Qualifying Contractors and Operatives

This is detailed within stage 1 and 5 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map. The duties placed on the Group by the Gas Safety (Installation and Use) Regulations, require the Group to ensure that the employees, or contractors it intends to use, are suitably Gas Safe Registered and competent for the categories of work they are expected to undertake.

After completion of the evaluation a register of all Group employees and contractors employed on the above work will be kept on electronic file. Copies of current Gas Safe registration, insurance certificates, operative's registration, and qualifications,

will be kept by the **Compliance Team** and details will be checked regularly and updated annually as detailed in the procedure.

Process for Uniformity of Documentation

This is detailed within stage 3 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map and is intended to provide guidance for employees and contractors to identify all gas safety documentation utilised by the Group and to ensure that all documents used are and remain fit for the purpose.

To demonstrate that operatives and contractors have carried out the tests and checks required by the relevant Gas Safety (Installation and Use) Regulations, the Group will have in place uniform documentation and paperwork that will allow positive records to be completed for confirmation and future reference. Where any tests and checks are carried out by an operative the work records will 'positively record' the information detailed in the process.

Unsafe Situations Process

This is detailed within stage 4 of the Group Landlord Gas Safety Record (LGSR) Process Map and is intended to provide guidance for employees and contractors to follow when dealing with unsafe situations, and clarifies the Group's interpretation of specific aspects within the current Gas Industry Unsafe Situations Procedure (GIUSP)

This procedure will also ensure the Group meets the requirements of Regulations 34 (1) & (2 (Appendix 5)) of the Gas Safety (Installation and Use) Regulations, in ensuring the safety of its tenants in respect of gas escapes or suspected emission of products of combustion (fumes) in domestic properties.

Gas Escapes Process

This is detailed within stage 4 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map and is intended to ensure the Group meets the requirements of Regulation 34 (1 & 2) of the Gas Safety (Installation and Use) Regulations in ensuring the safety of its tenants from gas escapes or suspected emission of products of combustion (fumes) in domestic properties.

Process for Gaining Access

This is detailed within stage 2 and 3 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map and is intended to provide guidance for all employees and contractors involved in the process to follow; to demonstrate that all reasonably practicable steps to gain access to tenanted properties has been undertaken. This is with the aim of satisfying the legal duties of the current Gas Safety (Installation and Use) Regulations. Landlords have a duty to maintain all the appliances they own, as

well as undertake a safety check and produce a safety record. This is to be undertaken at intervals of no more than 12 months.

The basic steps and who is responsible are detailed below:

Planned appointment – **Compliance Team**

Personal visits – **Tenancy & Community Management Team**

Legal Options – **Company Solicitor / Tenancy & Community Management Team**

The Group will service and check the safety of all appliances and flues that the tenant cannot legally remove; this also includes Group purpose provided gas installation pipework. In respect of tenant's own appliances, the Group accepts its liabilities to the flues of the properties that tenants own appliances are connected to. In recognition of those liabilities the Group will undertake a gas safety check on all appliances connected to Group property flues.

Voids Process

This is detailed within stage 2 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map and is to be followed by Group employees and contractors to ensure that in the case of a tenant vacating a property, gas fittings/appliances are safe before the property is re-let. When a property becomes vacant the Group will ensure that gas fittings/appliances are safe before the property is re-let or worked in by other trades.

On first official occupancy day of the property a full safety check and inspection of the installation will be undertaken, and an interim Gas Safety Record produced and issued to the Group, and a copy, along with a current LGSR, given to the tenant. The tenant will also be given instruction on the safe use of appliances and controls.

Mutual Exchange Process

This is detailed within stage 2 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map and is to be used as a guide for Group employees and contractors to ensure that in the case of a tenant vacating/exchanging a property that gas fittings/appliances are safe before the property is re-let.

When an application for 'Mutual Exchange' of properties has been approved, the Group needs to ensure that gas fittings/appliances are safe on the day the exchange takes place. Mutual exchanges constitute a new tenant and therefore the requirements of the Gas Safety (Installation and Use) Regulations 36 (6b) apply.

On first official occupancy day of the property a full safety check and inspection of the installation will be undertaken, and an interim Gas Safety Record produced and

issued to the Group, and a copy, along with a current LGSR, given to the tenant. The tenant will also be given instruction on the safe use of appliances and controls.

Quality Control Process

This is detailed within stages 4 and 5 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map and is intended to provide the Group with a systematic approach to QC that is both efficient and effective, and the results clearly demonstrated and documented. The Group will ensure it has QC procedures that monitor and record the quality of domestic gas work that is carried out by all gas operatives working within Group domestic premises.

This procedure will also allow the Group to demonstrate its duty to the Health and Safety at Work Act and the Management of Health and Safety at Work Act. All work carried out on gas systems and appliances by operatives will be subjected to a formal audit on standards of workmanship to ensure that contract specifications and safe systems of work are being met.

This will include:

- Contractors quality control
- Internal quality control
- External, independent quality control

Process for Storage and Retrieval of Landlords Gas Safety Records

This is detailed within stage 3 of the ateb Group Landlord Gas Safety Record (LGSR) Process Map and is to be used as a guide for Group employees.

The purpose of this document is to:

Provide guidance for Group employees to follow when dealing with gas documentation, especially in the vetting, storage, and retrieval of all Landlord Gas Safety Records. It is a legal requirement that these documents be kept for a minimum of 2 years, and a Group requirement that they be archived for a further 4 years.

Other Document Links

Internal

- Health & Safety Policy
- Strategic Asset Management Policy
- Reactive Repairs Policy
- Landlord's Gas Safety Process Maps PS01-3
- Third Party Quality Assurance Auditing Contract Specification
- Non-Domestic Gas Contract Specification

- Non-Domestic Gas Laundry Contract Specification
- Gas Commercial Catering Contract Specification

External

- The gas Safety (Installation & Use) Regulations 1998
<http://www.legislation.gov.uk/uksi/1998/2451/contents/made>
- Safety in the installation and use of gas systems and appliances (HSE L56)
<http://www.hse.gov.uk/pubns/priced/l56.pdf>
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
<http://www.legislation.gov.uk/uksi/2013/1471/contents/made>
- Gas Industry Unsafe Situations Procedure
<https://www.gassaferegister.co.uk/media/2622/igem-g-11-gas-industry-unsafe-situations-procedure-april-2018-amendments.pdf>
- Gas Safe Register Legislative, Normative and Informative Document List
<https://www.gassaferegister.co.uk/media/2854/legislative-normative-and-informative-document-list.pdf>

PN:09

SA/06

Gas Safety Policy

Additional help

Contact our customer team quoting the policy reference:

Tel: **01437 763688**

Email: **hello@atebgroup.com**

Facebook **@atebgroup**

Face to Face: **Meyler House, Haverfordwest, SA61 1QP**

Version History

Ver.	Date	Changes
1	December 2019	New policy implemented
2	30/07/2020	Policy approved by Board
3		