



Gas Safety Policy

1.0 Purpose and Scope

The purpose of this policy is to ensure that all properties within the control and responsibility of Notting Hill Genesis have effective systems for gas safety.

The policy lays out our approach to gas safety and how we will meet our responsibilities and duties as a landlord and employer for safely maintaining our stock.

The policy covers all our employees and contractors undertaking works to the relevant properties, customers and anyone likely to be put at risk from work in these properties.

The policy applies to all properties that we own or manage.

2.0 Definitions

Landlords Gas Service Record (LGSR) – Landlords have a legal duty to ensure that the property they let is safe for their tenants. Landlords are required to carry out annual gas safety inspections of all gas appliances and associated flues and pipework to ensure all landlord appliance have full 26.9 checks¹. Results of these checks should be recorded in the LGSR, according to regulation.

3.0 Policy principles

We will ensure all reasonable steps are taken to access properties where we have a responsibility to maintain the gas appliances in either a domestic or commercial property or communal premises.

On a monthly basis (as a minimum) we will carry out reconciliation between the baseline property data on the NHG housing management system (Northgate), and the gas servicing register maintained by consultants. This will be signed off by the relevant Head of Service in the Assets & Sustainability directorate. The consultant then carries out a reconciliation with the suppliers.

Where access is not provided, we will pursue legal action to gain the required level of access to satisfy our legal obligations as a responsible landlord. In addition, we may

¹ Regulation 26.9 is a section of the Gas Safety Installation and Use Regulations that provides guidance on what checks an engineer should carry out when working on an appliance.

force entry under specific circumstances. These circumstances, and the procedure steps that we will take are as outlined in our No Access policy.

We will service and check the safety of all relevant gas appliances in our properties annually. This includes gas pipe work. This excludes customers' own appliances

Where an LGSR is issued under the MOT style regime (preserving the anniversary of the previous test) this will be clearly noted on the certificate and in the gas servicing register.

We will carry out an annual gas safety check on each commercial/communal system.

We will undertake the annual safety check as per the manufacturer's instructions and produce certification to support these actions. This certification should include (but is not limited to):

- Description and location of each appliance and/or flue check
- Name, registration number and signature of the engineer who carried out the check
- Date on which the appliance and/or flue was checked
- The address of the property at which the appliance and/or flue is installed
- The name and address of the Landlord (or their agent where appropriate)
- Any defect identified and any action required or taken to fix it
- Confirmation of the results of operational safety checks carried out on the appliance
- Details of extended tests carried out (test smoke, heat and carbon monoxide detectors)

A copy of the Landlords Gas Safety Record (LGSR), confirming the findings will be issued to the customer or responsible person/occupier within 28 days from the date of the check. This may be issued in hard copy or electronically. We will retain an electronic copy of the LGSR for a period of two years. It will also be referenced and stored on a central system that can be accessed by all staff.

We will ensure that only appropriately trained contractors undertake work in our homes. This is achieved by ensuring engineers have a valid Gas Safe accreditation and are recorded on the Gas Safe register. The contractors hold a register of engineers associated with the contract, a consultant will review the qualifications of the engineers each month. Any new starters on the contractor side have their details and Gas Safe numbers passed to the consultant who double check they are valid and include them in the monthly review. Contractors who install, service, maintain or repair gas appliances and other gas fittings will adhere to the guidance and practical advice detailed within the HSE Approved Code of Practice; Safety in the installation and use of gas systems and appliances (L56). Contractors must have their own safeguarding policy in place and work to these and also to NHG policies.

We will ensure that all work relating to solid fuel will be carried out by a Heating Equipment Testing and Approval Scheme (HETAS) approved engineer.

Where a property is identified as void, we will cap the property as soon as is reasonably practicable after it becomes vacant. A system inspection will take place prior to capping the supply to ensure satisfactory operation. An LGSR will be completed to reflect this, reducing the risk an uncapped supply in a vacant property poses and allowing a smooth transition for the incoming customer.

Where there is a mutual exchange, an LGSR will be undertaken when the customer moves in.

We will install Carbon Monoxide detection in line with current regulations. NHG will retain responsibility for the carbon monoxide detector, checking it during the LGSR visit and replacing it when required.

Where NHG has appointed a managing agent to provide housing management services to residents, including the provision of a Landlord Gas Safety Record (LGSR), this arrangement will be recorded on an asset system as will the LGSR.

Where a communal gas supply is managed by a third party in a building where there are NHG residents this will be recorded on an NHG system to identify that there is a requirement for a gas safety check and that the third party is responsible for it. Certification will be held on an asset system.

Unsafe situations

Contractors (whether appointed by NHG or a managing agent) must follow the current Gas Industry Unsafe Situations Procedure taking the appropriate action.

Gas incidents

Contractors (whether appointed by NHG or a managing agent) must follow the current Gas Industry Unsafe Situations Procedure taking the appropriate action.

RIDDOR, unsafe gas work and theft of gas reporting

Contractors (whether appointed by NHG or a managing agent) must follow the current Gas Industry Unsafe Situations Procedure taking the appropriate action.

In the event of a gas incident, RIDDOR, unsafe gas work or theft of gas reporting the contractor (whether appointed by NHG or a managing agent) must advise NHG at the earliest possible opportunity. This will be recorded on the NHG Health & Safety system and investigated as appropriate.

Customers' own appliances

We do not take responsibility for servicing customers' own appliances, unless stated in their occupancy agreement.

Any open flued appliances within a dwelling (whether owned by NHG or the resident) should be isolated and, where the appliance is owned by NHG, replaced with a room sealed appliance. It is acknowledged that residents may refuse NHG permission to undertake this work. In this situation the risk to the resident should be explained and a safe open flued appliance can be left in situ and in working order.

We will carry out a visual risk assessment of a customer's cooker as described in Gas Safe Registers Technical Bulletin 012.

Should any defects be discovered during this visual risk assessment, these will be brought to the customer's/responsible person's attention by recording them on the LGSR. If the appliance is deemed unsafe, the Gas Industry Unsafe Situations procedure will be invoked. This includes, where necessary, disconnecting the appliance, issuing a warning notice, labelling the appliance confirming the nature of the defect and what action the responsible person needs to take.

Residents can arrange for installation of their own gas cookers, hobs and ovens but the installation has to be done by a gas safe registered engineer and will be appropriate certified (i.e. an LGSR should be provided if any works to the system are undertaken.) Permission will not be granted for residents to install gas fires.

4.0 Monitoring and review

We will monitor this policy to ensure it delivers the expected outcomes using service standards, key performance indicators, audits and customer satisfaction surveys.

Key performance indicators are produced monthly to confirm that gas servicing has been undertaken and whether all servicing certificates are in date.

This policy will be reviewed every three years in an agreed policy review programme unless there are significant changes to legislation or regulation or deficiencies or where there are changes to best practice identified. If this occurs an immediate review will be initiated.

5.0 Our approach

In writing this policy we have considered the need for assessments to ensure that we are considering equality, diversity and inclusion and privacy impact assessment but these are not relevant to this policy.

6.0 Reference

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Housing Act 2004
- Gas Safety (Installation and Use) (Amendment) Regulations 2018
- Gas Safety (Management) Regulations 1996
- The Approved Code of Practice; Safety in the installation and use of gas systems and appliances (L56)
- BS5440-1:2008 and 2(2009) flueing and ventilation for gas appliances of rated input not exceeding 70kW net.
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Document control

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Version Control

Date	Amendment	Version
April 2019	New policy created	1.0
August 2021	Addition of actions in unsafe situations and role of EMAs. Information added on reconciliation exercise and annual gas safety check on each commercial\communal system.	2.0
Aug 2022	Review of previous updates provided by Director of Compliance.	3.0