

Growth and Place Directorate

GAS SAFETY POLICY

Directorate	Growth and Place
Responsible Person	Head of Mechanical and Engineering
Resident Sign-off	N/A
Approval Date	19 July 2018
Next Review Date	19 July 2019
Version Number	FINAL

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DOCUMENT RECORD

Issue No.	Date of Issue	Review date	Reviewed by	Comments	Approved by	Approval Date
Existing Policy	19/6/17	April 2018		Approved policy	Cabinet	April 2017
Revision V1	19/6/17	Sept 2017	LB	Proofread & updates	N/A	N/A
Revision V2	19/6/17	28/2/18	CK/LB	Further amendments in line with technical developments, accuracy & structural changes	N/A	N/A
Revision V3	19/6/17	18/7/18	LB	Complete draft for technical check	N/A	N/A
Revision V4	19/6/18	19/7/18	CK	Technical clarifications	N/A	N/A
Revision FINAL	19/7/18	19/7/19	DM	Approved	David McNulty	19/7/18
Revision FINAL	20/8/18	19/7/19	LB	Minor structural amendments		

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1.0 Introduction

1.1 The London Borough of Hammersmith and Fulham (LBHF) is legally bound as a landlord to keep its residents and the public safe by stringently adhering to gas safety regulations when installing, maintaining or checking all gas appliances, boilers or services, owned or managed by the council's Growth and Place Directorate (GPD).

1.2 Through this policy, and associated procedures, GPD will provide details of how the council will comply with relevant legislation. It will state the responsibilities and competences staff and contractors will have in relation to gas appliances, flues, domestic and communal boilers, heating systems and services. It also covers inspection, monitoring, reporting arrangements and the keeping of records.

2.0 Purpose

2.1 This policy outlines the arrangements operated by the council to comply with the requirements of the Gas Safety (Installation and Use) Regulations 1998 (GSIUR) and amendments and to ensure all risks are mitigated. These risks include:

- fires or explosions caused by gas leaks;
- carbon monoxide poisoning caused by poor combustion attributable to faulty or inadequately serviced appliances;
- scalding due to excessive hot water temperature, resulting from inadequate control of system temperature.

2.2 This policy also outlines the council's responsibilities as a landlord in respect of gas safety.

2.3 The policy is owned by GPD and will be managed by the Gas Safety Team (GST).

2.4 Performance against key performance indicators for gas safety will be reported on a quarterly basis to the Growth and Place Directorate Management Team (DMT).

3.0 Scope

3.1 This policy relates to:

- staff or other persons under the council's control, including contractors;
- all council owned residential properties where the council has a landlord responsibility that include a gas appliance, a flue, a gas meter and associated pipework;
- all hostels, private sector leasing (PSL) and private license accommodation (PLA) properties where gas safety is managed by GPD, that includes a gas appliance; a flue, a gas meter and associated pipework;
- all properties where the council does not own the property but has a landlord's responsibility;
- communal heating systems and associated boilers and plant that are owned and/or managed by the council.

3.2 This policy does not cover corporate buildings owned and managed by the council.

3.3 The testing of gas appliances and installations within dwellings only extends to rented properties. Leaseholders are responsible for the maintenance and testing of their own installations within the demise of their property.

3.4 The scope of this policy and associated procedures cover:

- the health and safety of residents, employees, visitors, and contractors who use or come into contact with gas appliances, equipment and installations within council residential premises;
- inspection and testing of gas appliances, equipment and installations that the council has responsibility for maintaining in safe working order;
- dealing with gas related incidents;
- lines of responsibility within GPD for the management of gas safety;
- provision for staff of suitable and sufficient information and guidance to ensure that all gas installation works and/or repairs, undertaken by the council's contractor, comply with current health and safety legislation relating to gas and gas safety.
- the competences of people who carry out or supervise gas installation works and/or repairs on our behalf;

- legal requirements for maintaining gas records and other gas safety documents.
- a plan for reviewing and monitoring gas safety compliance.

3.5 The council, its employees and contractors must adhere to the following legislation and regulations:

- The Gas Safety (Installation and Use) Regulations 1998
- Gas Safety (Management) Regulations 1996
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Landlord and Tenant Act 1985
- Defective Premises Act 1972

4.0 Policy

4.1 Annual gas safety check - also known as Landlord's Gas Safety Record (LGSR)

4.1.1 An annual gas safety check will be carried out every 12 months and prior to the expiry of the current LGSR on all gas installations and systems that the council is responsible for.

4.1.2 The annual gas safety check will be carried out in accordance with the relevant regulations and the service contract with council contractors. This includes the keeping of records, the supply of documents, additional checks, reporting defects, quality inspections and monitoring of performance.

4.1.3 The contractors will follow the non-access procedure to ensure the 12 month annual gas safety check and certification is done before the current LGSR expires.

4.1.4 The council will carry out and recharge leaseholders if they fail to provide a LGSR before the current certificate expires.

4.2 Gas repairs and maintenance

4.2.1 This includes all day to day repairs and the replacement of systems or appliances on a case by case basis.

4.2.2 All repairs must be responded to in line with the council's repair contract and within the timescales. Quality checks and post inspections will be carried out in line with the term contract and the procedure for quality assurance inspections.

4.4 Installations

4.4.1 All installations must be carried out in accordance with the manufactures' instructions and gas regulations by competent people. All documents required under the term contract must be supplied to the council and all audit and quality assurance checks carried out within timescales.

4.4.2 New installations must be commissioned and the relevant certificate provided to the council in accordance with the contract and Gas Safety (Installation and Use) Regulations 1998 (GSIUR). All relevant checks will be carried out and recorded.

4.5 Communal boilers

4.5.1 The council will ensure that the boilers and associated systems are maintained and serviced to a high standard and repairs are carried out within required timescales to ensure that the systems are effectively operating at all times. This will be undertaken through the delivery of a Planned Preventative Maintenance Programme (PPM) and a response breakdown call out service (operating 24 hours per day, 7 days a week, 365 days a year). The term contractor will provide this service.

4.5.2 Communal boilers and flues, will be serviced, and inspected for safety, at intervals of not more than 12 months. All records of the gas safety inspections providing the required statutory information and any additional information required under the contract will be displayed in accordance with regulations.

4.5.3 A programme of PPM will be carried out twice a year to all communal heating systems to ensure they are maintained to a high standard of reliability and efficiency.

4.5.4 All gas safety certificates and maintenance records will be checked by GDP's GST for accuracy. They will be stored as required by regulations. All quality checks will be carried out and consequent action taken as a result will be reported to the GDP DMT.

4.6 Voids

4.6.1 A gas check will be carried out on all voids and mutual exchanges prior to the new tenant moving in. Properties will not be allocated without a valid LGSR. This check and any works will be carried out in accordance with the void procedure and the term contract and all relevant legislation.

4.7 Independent Audits

4.7.1 The council will commission an external, competent consultant to carry out a programme of inspection and audit of the gas services carried out. The consultant will report to the council on any issues and/or defects. Where required, the contractor and/or GST will remedy the issues through an improvement plan. Targets and progress will be reported to GDP DMT weekly until all actions are complete. A minimum annual target of 10% will be maintained.

4.8 Gas appliance register

4.8.1 The council will hold a register of all gas appliances which will detail a description of the appliance, make, model, location, date of installation and the LGSR and date of expiry.

4.8.2 When appliances are added or replaced the register will be updated accordingly. Where any other section or department commissions the installation or replacement of appliances, they must notify the GDP GST.

4.9 Documents and certificates

4.9.1 The council will keep for 2 years, or as required by regulation:

- an up to date gas appliance register;
- copies of all LGSRs;
- post inspection and quality inspection reports.

4.3 Gas escapes and carbon monoxide

4.3.1 The council and its contractors will adhere to the gas escape procedure following any reports of a gas or carbon monoxide leak. The contractor will also follow the gas industry unsafe situations procedure (GIUSP).

4.3.2 The council will deal with a suspected carbon monoxide incident in accordance with the carbon monoxide incident procedure (CDMMADI).

4.3.3 In all instances contact will be made with the emergency supplier and their advice followed.

5.0 Responsibilities

5.1 Contractors

5.1.1 The council has a term partnering contract (TPC) with Mitie. The contractor is responsible for delivering the following:

- replacement boiler programme;
- day to day repairs to gas installations, appliances, and heating systems;
an annual gas safety check and servicing programme of domestic installations including gas services within dwellings or communal systems
- maintenance and servicing of communal heating systems and boilers;
- maintenance of all communal chimneys, domestic flues etc.

5.1.2 They have the duty to only use approved competent contractors and engineers for any related work to residential properties the council owns, manages, or has responsibility for within the GPD. All gas contractors and engineers must be registered on the gas safe register (LGSR) and must provide such evidence as part of their tender submissions and again prior to work commencing on site.

5.1.3 The contractor/s are required to provide written confirmation of the LGSR for individual engineers and which areas of gas work the individual engineers are qualified to undertake, along with expiry date of the qualification and gas safe registration.

5.1.4 If contacted by a tenant about a gas incident and National Grid (NG) have left documents with the tenant, the contractor undertaking further investigation or undertaking rectification works, shall obtain a copy of all documents left with the resident. The contractor shall provide the council with copies of all documents at their monthly contract review meeting.

5.1.5 The contractor is required to carry out all work, inspection, notifications and monitoring and reporting to the council for all areas relating to gas in accordance with the regulations and the contract. If the contractor has been involved in any gas incident

that is classified as At Risk (AR) or Immediately Dangerous (ID), the contractor shall provide the council with all information as required by the contract and regulations.

5.2 The Council

5.2.1 The G&P Assistant Director, Property and Compliance is responsible for ensuring that a robust gas safety policy is established and maintained for all the council housing stock and associated communal areas

5.2.2 The Assistant Director, Property and Compliance will delegate this to the Head of Mechanical and Engineering who will oversee the implementation of the gas safety policy and will ensure that progress towards meeting the policy is reported upwards.

5.2.3 Delivery of responsive repairs, inspection and testing programmes, repairs and upgrades to gas installations is through the council's term contractor.

5.2.4 Monitoring and management of the contractor's performance and delivery of the testing and investment programmes will be carried out by the GST within G&P who report to the Head of Mechanical & Engineering.

6.0 **Monitoring, review, and evaluation**

6.1 The inspection and testing programme will be closely monitored by the GST and monitoring will be done through monthly updates and review meetings with the contractor. An independent inspector will take part in the meetings and minutes will be circulated to contractors, inspectors, the Assistant Director, Property Service and operational core group meetings.

6.2 An independent audit on 10% of contractor gas safety installations, servicing and checks will be monitored by the GST dealing with non-compliance or quality issues. The percentage undertaken will reflect the failure rate of the inspected sample over a 3 month period and therefore may go up or down accordingly but never below 10%. Audits will be undertaken using industry best practice.

6.3 Performance will be reported to G&P Assistant Director, Property and Compliance monthly and G&P DMT monthly. Reporting will include:

- % of LGSRs completed in time
- % of post gas safety inspections
- % of faults by category:

- Immediately Dangerous
- At Risk
- Contractual
- confirmation of rectification

6.4 A Technical Compliance group, chaired by the Head of Mechanical & Engineering, will meet at least three times a year and include:

- independent expert (Gas Safe)
- inspectors
- contract supervisors

The group will analyse findings and technical differences. An independent expert will have the final say on the process that everyone must follow. The procedural document will be updated accordingly.

6.5 The Gas Safety team will lead quarterly toolbox talks with contract engineers and third party auditors to ensure shared learning and understanding.

6.6 The G&P health and safety team will undertake an annual audit of working arrangements in line with this policy. Any findings and recommendations will be reported directly to the Assistant Director, Property and Compliance, and G&P DMT.

7.0 **Associated documents**

- The council's corporate health and safety policy
- The equality impact assessment
- Gas escape process
- Carbon monoxide incident procedure
- Quality assurance inspections procedure
- Correction of defects process.
- Voids procedure
- Non access procedure.

8.0 **Appendix 1**

8.1 Detailed responsibilities

9.0 **Associated procedures**

- Fire Risk Assessments
- Asbestos Management Plan
- general emergency procedures

10.0 **Contact Details**

- The contractor's customer service centre 0800 023 4499 or 020 7205 04000
- National Grid (Major Gas Release) 0800 111 999
- GDP H&S manager, hrdhealthandsafety@lbhf.gov.uk, 0208 753 4151
- GDP Head of Mechanical and Engineering gassafetyteam@lbhf.gov.uk or phone 0208 753 4420
- Gas contractor Mitie (individual and communal systems) 0800 023 4499 (option 1 for gas)
- For emergency and gas incidents during office hours hammersmithdomesticenergy@mitie.com. For out of hours emergencies and gas incidents helpdeskoooh@mitie.com
- Stone View (PSL) 0208 886 220

Appendix 1

Detailed Responsibilities

1.0 Chief Executive

1.1 The Chief Executive is accountable for the facilitation, implementation and adherence to this policy, including the allocation of sufficient resources and funds.

1.2 S/he retains accountably as the “responsible person” within the scope of the relevant legislation.

1.3 S/he in this capacity will delegate the responsibility for implementation of this policy to Directors as appropriate.

1.4 Ensure that GDP staff:

- Enforce the requirement regarding the storage of bottled gas as detailed within the tenancy handbook.
- Ensure safe disposal of discarded gas bottles on estates.
- Report any suspicious gas related repairs urgently to the Gas Safety team.
- Assist with the provision of access for gas safety checks

2.0 Directors

2.1 Directors will undertake practical application of the policy within their areas of responsibility, delegating duties as appropriate.

2.2 Directors will ensure that:

- Suitable and sufficient procedures for their areas of responsibility and subsequent actions implemented as appropriate.
- Resources and procedures are correctly used and maintained.
- Identify and facilitate training in accordance with the requirements of this policy.
- Systems are periodically reviewed and tested; ensuring that failures and defects are reported and addressed.
- Incidents or activities resulting in the detection or reporting of carbon monoxide (CO) poisoning to the residents are fully reported and investigated including implementation of investigation recommendations/findings.
- All contractors have in place suitable and sufficient procedures to address issues of gas incidents e.g. gas escape procedure or RIDDOR.
- The Assistant Director, Property Services has the responsibility to provide and maintain the required technical information on gas safety to all tenants, residents, and agents of private sector leased (PSL) and private

letting agreement (PLA) properties where tenants carry out activities that carry a risk in relation to the use of gas.

- All preventative and reactive actions are undertaken in a timely manner.
- All staff and officers are fully supported in decisions made in accordance with this policy.

3.0 Health and safety manager

3.1 The GDP health and safety manager will:

- Maintain a competent person status in matters of general health and safety and fire safety.
- Act as secondary contact with all enforcement agencies.
- Ensure that statutory reports are made to the Health and Safety Executive in a timely manner and by the quickest means possible.
- Provides periodic information and summaries to the GDP DMT and health and safety committees as required.
- Establish an accident/incident investigation teams.
- Report the outcome of any accident/incident investigations and the recommendations arising from to the directors.
- Review the gas policy, in conjunction with the Head of Mechanical and Engineering, every year to ensure it covers current statutory regulations and the council's policies and procedures.

4.0 Head of Mechanical and Engineering

4.1 The gas safety team (GST) is managed by the Head of Mechanical and Engineering. The GST are responsible for the following areas of gas risk management, with respect to all residential properties within the council portfolio and temporary accommodation (PSL/PLA properties).

4.1.1 The Head of Mechanical and Engineering will:

- Ensure the responsive repair and maintenance of gas fired heating and hot water systems.
- Ensure the annual servicing programme of gas fired heating, hot water systems and all landlord gas appliances, including flues takes place in accordance with regulations in relation to a landlord's responsibility and before the LGSR expires.
- Ensure the replacement of gas central heating boilers, systems and associated control in accordance with current legislation, where they are beyond economic repair.
- Ensure property access is managed effectively to ensure compliance.

- Refer difficult to access properties to the environment directorate for issuing of an abatement notice, obtaining court warrant, and execute force entry in to these properties.
- Manage gas emergency response - including liaison with National Grid.
- Maintain the gas database on repairs, including all LGSR certificates.
- Provide input into the procurement of gas service, maintenance, repairs, installation contractors.
- Maintenance records of the gas contractor competency.
- Keep maintenance records of the annual gas safety check for a minimum of 2 years.
- Provide advice and information to stakeholders (tenants, leaseholders, and agents) on gas safety matters.
- Instruct the fitting of carbon monoxide (CO) detection where necessary e.g. boxed in flues.
- Offer leaseholders the contact details of our contractor to arrange a gas service.
- Deal with gas incidents that must be notified to the HSE and head of health and safety.
- Achieve the required quality assurance checks are carried out by the gas safety team, e.g. 10% of post services are inspected for repairs and boiler replacement carried out by the term contractor for gas servicing and repairs.
- Ensure that all defective works identified within the 10% quality check, are rectified by the gas contractor.
- Ensure that all gas incidents that are classified as AR or ID are dealt with in accordance with GIUSP.
- Ensure 20% quality assurance check of the corrected works resulting from defect identified during the 10% quality assurance check.
- Keep records of the 10% quality assurance check by the gas inspector and gas contractor.

5.0 The environment directorate

5.1 The environment directorate is responsible for:

- The issuing of abatement notices to the residents, where the contractor and GST have experienced difficult gaining access to the property for the annual gas safety check.
- Obtaining county court warrants allowing force entry too difficult to access properties.
- Executing forced entry, in conjunction with the contractors and housing management.

6.0 The contractor

6.1 The contractor is responsible for the following areas of gas risk management:

- To make appointment with tenants for the annual gas safety check and gas servicing.
- The execution of the annual gas safety check and servicing associated with the gas appliance and associated equipment.
- Ensure residents receive a copy of the LGSR within 28 days of the check been done or before occupancy. In situations of AR and ID, resident is given copy of warning notice, immediately the situation is discovered.
- Ensure all operatives working with gas are correctly qualified and LGSR.
- Ensure that all gas incidents that are classified as AR or ID are dealt with in accordance with the Gas Industry Unsafe Situations Procedure (GIUSP)
- Inform the council of any health & safety issues seen during visits to its premises.
- Ensure relevant safety information e.g. asbestos containing material are provided to the council.
- Ensure that unsafe appliances are prohibited from being used by residents and correctly recorded and labelled in accordance with the GIUSP.
- Ensure that all safety features and controls are checked and functioning correctly during the annual service.
- When carrying out the annual gas safety check and service, also check operation of smoke detectors and CO alarm.
- Executing all gas repairs and new installation in the council owned properties.
- Carry out 10% quality assurance check of the works associated with the repair, servicing, boiler replacement and new installations.
- Provide the council GST with the copies of the results of the 10% quality assurance check.
- Undertake all corrective works of defects identified by the council gas inspectors during their 10% quality assurance check and provide feedback to inspectors when corrective works are completed.
- Any defect resulting from the servicing and gas safety check and the 10% quality assurance checks carried out by both the contractor and the council are rectified, the system rechecked and a new LGSR issued; details of the remedial actions are to be recorded on the new LGSR.
- Providing appropriate gas safety information to tenants and leaseholders.

- Offer temporary heating facility when the resident or tenant is without heating service during the heating season.
- Ensure all gas analytic equipment is calibrated and recorded within a twelve monthly period or in accordance with the manufacturer's instructions.

6.2 Voids

6.2.1 Properties with individual gas and hot water systems

The voids team is the responsibility of the term contractor who are responsible for the following areas of gas risk management:

- Carry out an initial void check and identify any defect with the existing system.
- Uncap the gas supply and carry out second stage void check once all repairs have been completed and supplying a copy of landlord gas safety record (LGSR) to the GST.
- Ensuring there is an up-to-date valid LGSR certificate for mutual exchange properties and temporary accommodation.
- Notify the GST that the property is void.

6.2.2 Properties with communal heating and hot water systems

The term contractor's voids team is responsible for the following areas of gas risk management:

- Carry out and certificate all gas safety aspects of communal heating and for separate gas supplies for an appliance. Provide all necessary paperwork to the GST.
- Cap the gas supply and make safe and forward copy of the LGSR certificate to the GST.

7 Demolitions and new build

7.1 Demolition of existing properties

7.1.1 Prior to any demolition the council will ensure that:

- The gas supplier(s) and transporter(s) to the properties have been fully notified of the demolition
- Final meter readings have been provided to the supplier(s)
- Gas appliances have been removed from the properties
- Gas meters have been removed by the supplier(s)
- Connections to the properties have been isolated and/or disconnected by the transporter(s)

7.2 New build properties

7.2.1 All gas installations shall be carried out by 'Gas Safe' registered installers and in accordance with all relevant Gas Safety Regulations, Building Regulations and British Standards.

7.2.2 Gas safety certificates shall be provided for all installations in new build properties.

7.2.3 Where gas appliances have been provided by the council these shall be installed by 'Gas Safe' registered installers. Full details will be recorded including makes, models and dates of installation.

7.2.4 All incoming gas supplies shall be individually metered - including landlord's supplies.

7.2.5 Mains powered carbon monoxide detectors shall be fitted in all new build properties.

7.3 Handover requirements

7.3.1 In addition to the health and safety file, the contractor shall compile a handover pack – one for each property. The handover pack shall provide copies of all gas safety certificates. The contractor will also provide and fix laminated tags to identify the location of the gas stop valves. The meters will be read and a meter reading form provided with details of the MPRN to enable residents to initiate gas supplier accounts.

8.0 Private sector leasing

8.1 Housing staff in the property procurement team ensure that that all gas, electric and other compliance documentation is obtained from the private sector leasing landlord and managing agents during the property procurement process. Gas safety and electric certificates are checked for compliance and satisfactory rating on all forms of temporary and private sector accommodation.

8.2 Landlords have the option to carry out the annual inspection and send copies of the certificate to the council, 4 weeks prior to the expiry of the gas certificate.

8.3 Where landlords have not notified the council of their decision to carry out the annual safety check, the council's qualified contractors will carry out the function without further notification.

8.4 Housing staff will update Iworld with the new expiry dates when certificates are received and daily monitoring of reports to ensure continued 100% compliance.

8.5 Housing staff will make appointments where the certificate will expire within two calendar months. Housing staff will send an initial letter to tenants, this will inform tenants of the requirement and the appointment date as well as the importance of allowing access. The consequences of non-access will also be explained.

8.6 Where access is not gained and the repairs team have not been notified, the housing officer will work with environment service to gain access through forced entry if necessary.

8.7 Statistical information will be recorded monthly on the accommodation services KPI spreadsheet by housing staff and reported to directorate health and safety board meetings for monitoring purposes

8.8 Hostel & TOLs (temporary on licence properties)

8.8.1 Hostel gas and all other health and safety compliance is carried out by the council's term contractor.

8.8.2 Housing staff monitoring 100% compliance of the hostels and TOLs and report compliance at directorate health and safety board monthly meetings.