



**Cobalt**  
■■■ Housing

**GAS SAFETY  
POLICY**

<b>Lead Director</b>	<b>Director of Operations</b>
<b>Reference</b>	POL 15
<b>Committee Review</b>	Homes & Neighbourhood Committee 1 <sup>st</sup> March 2023
<b>Version Date</b>	01/03/2023

## **1. Introduction & Aim**

- 1.1 This policy aims to ensure that Cobalt meet our obligations as a landlord and seeks to provide assurance that gas safety is adequately managed, ensuring the safety of our tenants, leaseholders, staff and the general public.
- 1.2 At Cobalt Housing we are committed to ensuring that our residents' homes, our offices, and commercial properties are safe and secure places in which to live and work.
- 1.3 The aim of the Policy is to ensure so far as reasonably practicable that our residents, employees and the general public, are not exposed to any risks to their health or safety and wellbeing from electricity.
- 1.4 This policy applies to all residential and commercial properties owned and managed by Cobalt Housing Limited.

## **2. Policy Statement**

- 2.1 Cobalt Housing acknowledges and accepts its responsibilities with regard to gas safety and will ensure that at all times we work in accordance with the required legislation, regulations and guidance referred to in section 5.
- 2.2 Cobalt Housing's gas safety policy will apply to offices; general needs accommodation; other residential rented properties owned by Cobalt Housing and communal areas including leaseholders/shared ownership. The policy will also extend to all individuals employed by Cobalt including contractors and sub-contractors.
- 2.3 Cobalt will take all reasonably practicable steps to install, manage and maintain gas equipment to prevent and control any gas risks in the properties that we own or manage including residential properties, offices and commercial buildings.

## **3. Policy Principles**

### **3.1 Landlord Obligations**

- 3.1.1 Cobalt will hold accurate records against each property it owns or manages setting out the requirements for gas safety checks and servicing of all gas fittings, appliances, and flues.
- 3.1.2 Cobalt will ensure that all domestic & non-domestic (communal) properties and commercial properties owned or managed have a valid Landlord Gas Safety Record (LGSR) no older than 12 months from the date of the previous LGSR or following a new boiler installation.
- 3.1.3 Cobalt will ensure that only suitable competent Gas Safe registered contractors and engineers are appointed to undertake any works to boilers, appliances, gas fittings or service pipework.
- 3.1.4 Servicing and maintenance of Solid fuel appliances and open fires (including sweeping of chimney flues) will be undertaken on a biannual basis by HETAS (Heating Equipment Testing & Approval Scheme) approved engineer (or such other body as may from time to time be approved by the Health & Safety Executive).

- 3.1.5 Cobalt will ensure that copies of all LGSRs are provided to tenants within 28 days of completion or displayed in a common area where necessary upon completion of the LGSR.
- 3.1.6 Gas supplies to all vacant properties including property acquisitions will be capped and made safe upon tenancy termination or completion of sale. The same will apply for the handover of new build properties if the new tenancy is not commencing immediately at the point of handover.
- 3.1.7 Following the commencement of a new tenancy Cobalt will reinstate gas supplies to vacant and new build properties by undertaking a turn on and test appointment agreed with the new tenant and will issue a new LGSR.
- 3.1.8 Cobalt will ensure that gas safety checks are carried out following the commencement of any new tenancy created as a result of a mutual exchange, tenancy succession and/or transfer and will issue the tenants a new LGSR.
- 3.1.9 The repair and maintenance of tenant's own gas appliances is the responsibility of the tenant. However, during the annual gas safety check a visual inspection of tenants own gas appliances will be carried out as well as a flue test. This includes any chimney flues or similar which are integral to the structure of the property which are connected to a tenant/occupier owned Heating Appliance.
- 3.1.10 Where customer appliances are found to be immediately dangerous, the item will be disconnected or isolated by appointed gas contractors.
- 3.1.11 As part of the annual gas safety check, Cobalt will ensure:
- at least one smoke alarm is present and in working order on each storey of a dwelling where there is a room used as living accommodation.
  - a carbon monoxide alarm is present in any room used as living accommodation which contains a fixed combustion appliance (excluding gas cookers).
  - replace any devices found faulty with a battery operated device at the time of the visit.
- 3.1.12 Any faults identified with hardwired smoke, heat or carbon monoxide alarms will be replaced with a battery operated device and referred for a follow up repair.
- 3.1.13 Cobalt will not permit gas supply to be disconnected to properties for anything other than safety reasons. In the event of a tenant requesting for personal reasons for the gas supply to be disconnected to their home must make a formal request through our alteration process for Cobalt to review.
- 3.1.14 Cobalt will have a formal process in place to gain access to complete a gas safety check, evidencing that all reasonable and practical steps have been made. Where tenant vulnerability issues are known or identified we will tailor our services accordingly to ensure timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.

### **3.2 Compliance Remedial Work**

- 3.2.1 Cobalt will ensure there is a robust process in place for the management of any follow-up works required following the completion of a gas safety check including solid fuel appliances and open fires.
- 3.2.2 Gas reactive maintenance will be completed during void refurbishment period before the property is reoccupied.
- 3.2.3 Cobalt will ensure there is a robust process in place to investigate and manage all RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) notices issued with regard to gas safety.

### **3.3. Record Keeping**

- 3.3.1 Cobalt Housing will maintain accurate data for all assets to identify gas safety responsibilities. All premises with a gas supply or the potential for a gas supply to be installed will be included within the annual inspection programme.
- 3.3.2 All gas safety certification will be held electronically and held within Cobalt's Compliance Document Management System.
- 3.3.3 Cobalt will hold and maintain accurate records on the qualifications of all contracting organisations and engineers inclusive of sub contractors undertaking gas works on behalf of Cobalt Housing.

### **3.4 Audit**

- 3.4.1 To support performance management and to provide assurance on the quality and safety of work Cobalt will employ a Quality Assurance consultant to carry out on-site independent post works, servicing, and installation inspections including validation of Electrical certification as well as desktop & 'Work in Progress' site audits.
- 3.4.2 As standard a minimum of 10% sample will be conducted however these levels may fluctuate depending on the results to address any trends or corrective actions which may be required.

### **3.5 Non-Compliance**

- 3.5.1 Any non-compliance issue identified at an operational level will be formally reported to the Director of Operations in the first instance.
- 3.5.2 The Director of Operations will agree an appropriate course of corrective action with the Compliance team to address the non-compliance issue and report details to members of the Executive Management Team.
- 3.5.6 The Executive Management Team will ensure Boards and the Audit & Risk Committee are made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

3.5.7 In cases of a serious non-compliance issue the Executive Management Team and the Board will consider whether it is necessary to disclose the issue to the Homes England in the spirit of coregulation as part of the Regulatory Framework.

## 4 Risk Management

The key risk associated with non-delivery of this Policy is:

Risk Register Ref:	Risk:
COMP 02 - Health & safety breach - gas safety	Failure to comply with key landlord Health & Safety responsibilities for gas safety resulting in Health & Safety, compliance, and regulatory breaches.
Risk Consequences:	Management and Mitigation:
<ul style="list-style-type: none"> <li>• Health &amp; Safety breaches – Staff &amp; Contractors</li> <li>• Health &amp; Safety – landlord compliance breaches</li> <li>• Breach of regulatory requirements resulting in fines, penalties, or criminal action</li> <li>• Housing regulator adverse grading/intervention</li> <li>• Insurance claims – customers/staff/contractors</li> <li>• Negative Media/Reputation</li> </ul>	<ul style="list-style-type: none"> <li>• Effective Procedure and Processes</li> <li>• Effective use of OHMS Attributes</li> <li>• Electronic document management system</li> <li>• 10-month gas servicing programme</li> <li>• Robust business intelligence reporting</li> <li>• Real time event management</li> <li>• Environmental Protection ACT 1990 followed with LCC.</li> <li>• Third party quality assurance audits completed.</li> <li>• Robust procurement including competency of the contractor and operatives.</li> <li>• Contractor performance management meetings held quarterly &amp; annual reviews.</li> <li>• Monthly KPI reporting</li> <li>• Health &amp; Safety risk updates</li> <li>• Internal and external audit programme</li> <li>• Landlord compliance reporting to EMT, Board and HNC</li> </ul>

### 4.1 Key Risk Indicators and Control Limits

4.1.1 Detailed below are the key performance indicators that reported to Cobalt’s Board of Management and supported by the Landlord Compliance reporting.

- Total Number of properties with an overdue gas certificate during the period
- Properties without a valid LGSR

## 5. Regulatory & Legislative Compliance

### 5.1 Regulatory Standards

5.1 The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Homes & Communities Agency (HCA) in April 2012.

- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- The Building Safety Act 2022
- The Data Protection Act 2018
- The Equality Act 2010
- The Gas Safety (Installation and Use) Amendment Regulations 2018.
- The Health & Safety at Work Act 1974
- The Landlord and Tenant Act 1995
- The Management of Health & Safety at Work Regulations 1999
- The Provision and Use of Work Equipment Regulations 1998
- The Pressure Systems Safety Regulations 2000
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022.
- The Workplace (Health, Safety and Welfare) Regulations 1992

## 5 Links to Other Key Documents

Asset Management Strategy  
Health & Safety Policy  
Asbestos Management Policy  
Electrical Safety Policy  
Equality & Diversity Policy  
Repairs Policy

## 6. Governance of this Policy

<b>Equality and Diversity</b>	Customers and vulnerabilities are taken into account in the development of any policies, procedures and plans and Cobalt will provide a tailored approach in respect of service delivery where possible.
<b>Financial and Links to VfM</b>	Business plan provision to deliver regulatory requirements to achieve landlord compliance.
<b>Privacy and Data Protection</b>	Consideration in terms of GDPR needs to be factored in where access is required to undertake a gas safety inspection and tenant contact information is passed to the contractor.
<b>Health and Safety</b>	Failure to implement this policy carries significant risk in terms of health and safety for tenants, staff and contractors and embedding the policy will ensure landlord compliance for Cobalt.
<b>Development and Consultation</b>	The tenant consultative panel have reviewed the policy prior to its approval and recommendations have been adopted.
<b>Customer Profiles and Accessing Services Data</b>	Relevant data will be used to determine if a tenant requires support where access to a property is to be obtained.
<b>Monitoring and Review</b>	To provide assurance of how we meet the compliance requirements will be formally reported through KPI's, Landlord compliance reporting and operational risk updates.
<b>Roles &amp; Responsibility</b>	The Director of Operations is responsible to the Chief Executive and the Board for ensuring the effective implementation of this policy. Implementation of and adherence to the policy will be monitored by the Board.

## 6 Definitions

LGSR - Landlords' Gas Safety Record

CDM - Construction, Design and Management Regulations 2015 HETAS -

Heating Equipment Testing and Approval Scheme

RIDDOR - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations