

# Gas Safety Policy

(Incorporating Gas, Electric, Oil and Solid Fuel heating)

Health, Safety & Environment

GENERAL - EXTERNAL

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| Policy Approval Date: | 21.09.23 | Date of next review: | 20.09.26 |
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## 1. Purpose

Riverside aims to proactively manage the potential risk to health arising from all heating sources including an un-burnt or burnt gas situation in buildings owned or managed by The Riverside Group (TRG) and its subsidiaries. This policy and the associated management plan set out the steps TRG will take to maintain an effective safety testing, installation and maintenance and servicing regime to all installations as far as is reasonably practicable.

This purpose of this policy is to ensure TRG

- Customers, contractors, staff and visitors remain safe in our premises (both domestic and non-domestic).
- Identifies its specific responsibilities for each of its assets.
- Communicates internally and with customers and other stakeholders
- Meets its obligations under legislation and regulations (including but not limited to):
  - The Health and Safety at Work etc. Act 1974.
  - The Electricity at work act 1989
  - Gas Safety (Installation and Use) Regulations 1998.
  - The Management of Health and Safety at Work Regulations 1999.
  - Control of Substances Hazardous to Health (COSHH) Regulations 2002.
  - Building Regulations 2010 Part P
  - Building Regulations 2010 Doc J
  - Clean Air Act 1996
  - The Smoke and Carbon Monoxide Alarm Regulations 2015
  - The Dangerous Substances and Explosive Atmospheres Regulations 2002
  - The Housing Act 2004 which introduced the Housing Health and Safety Rating System (HHSRS) and the Housing Health and Safety Rating System Regulations 2005.
  - The Building (Scotland) Regulations 2004
  - The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
  - Workplace (Health Safety & Welfare) Regulations 1992
  - Landlord and Tenant Act 1985
  - The requirements of both the Regulator for Social Housing's (RSH) Homes Standard and the requirements of the Care Quality Commission (CQC).

TRG will also refer to the following specific guidance and advice on how to comply with the above legislation and regulations:

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- HSE Approved Code of Practice (ACOP) L56: Safety in the installation and use of gas systems and appliances Gas Safety (Installation and Use) Regulations 1998.
- HSE Approved Code of Practice (ACOP) L122: Safety of pressure systems

TRG will further follow guidance from the HSE, NICEIC (or equivalent governing body), HETAS, OFTEC, Gas Safe Register and IGEM to operate what is perceived as current best practice across all areas where gas safety impacts on TRG and its stakeholders.

## 2. Scope

This policy applies to all domestic and non-domestic buildings owned or managed by TRG where the gas supply, gas pipework, appliances, and flues, associated equipment and/or alternative form, of heating or associated ventilation system present a requirement for a statutory safety check, installation and maintenance, or servicing regime.

Building specific lease or management agreements may define legal responsibility. Where clear responsibility cannot be defined, the default position for any domestic or non-domestic buildings owned or managed is that TRG will actively manage that risk until a time when clearly defined legal responsibility can be evidenced.

## 3. Principles

UK regulations set out an explicit duty for landlords and building owners to safely maintain gas consumer pipework, appliances and flues, equipment as well as specific requirements for other forms of heating and/or ventilation systems.

The guiding principles of what TRG intends to accomplish through implementation of this policy are as follows:

- Prepare and maintain an effective management plan that sets out exactly how TRG will manage and deliver an effective safety check, maintenance and servicing regime to all relevant installations and systems, including but not limited to
  - additional guidance on how the commitments outlined within this policy will be implemented.
  - Provide clear lines of responsibility for the management of safety.
  - Set out key operational processes.
  - Ensure that a clear and consistent process is in place to obtain access to properties where this is required. This will include proactive assessment of available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement action will be used where required.
  - Maintain a process for dealing with gas unsafe situations or incidents in accordance with the Gas Industry Unsafe Situations Procedure.

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- All staff who have roles identified in the Management Plan will receive associated training appropriate to their role.
- Appoint a competent person or persons to manage risk.
- Take reasonable steps to identify and assess sources of risk.
- Undertake a cyclical programme of servicing and safety checks to all relevant heating & ventilation systems with a specific regime for an annual safety check of any gas supplies and installations.
- Work closely with and provide management oversight of delivery partners in relation to domestic heating servicing, maintenance and installation programmes.
- Appoint and manage competent external contractors to deliver communal servicing, repairs and installation activities, and any other heating & ventilation activities that fall outside of the scope of internal delivery partners.
- Establish and keep up-to-date a record of all installations and equipment within TRG buildings.
- Ensure that detailed records are kept for a minimum of two years, in accordance with regulations and administered, and residents provided with safety information and certificates on completion of safety checks.

## 4. Further Information & Support

This policy is to be read in conjunction with:

- Gas Safety, Heating & Ventilation Systems Management Plan
- TRG Building Safety Framework
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## 5. Roles and Responsibilities

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| <b>Executive Director of Asset Services</b>   | <ul style="list-style-type: none"> <li>• Responsible for overall policy implementation</li> <li>• Ensure that adequate resources are made available to enable the objectives of the policy to be met.</li> </ul>   |
| <b>Director of Building Safety</b>  | <ul style="list-style-type: none"> <li>• The Accountable risk lead with responsibility to appoint a responsible person and to ensure a Heating &amp; ventilation Policy and Management Plan is in place and a strategic risk register is in place which documents the key risks, controls and assurance required.</li> </ul> |
| <b>TRG Head of Shared Spaces &amp; Compliance</b><br><b>Director of Property Services (OHG)</b> | <ul style="list-style-type: none"> <li>• Legal responsibility for Compliance with landlord requirements under Gas safety regulations.</li> <li>• Define risk Controls through operational management plan.</li> <li>• Determine appropriate Assurances and document within our Risk Map.</li> </ul>                          |

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|   | <ul style="list-style-type: none"> <li>Management of legal compliance and for delivery of the key policy objectives, ensure the implementation of the policy, implementing the Heating &amp; ventilation management plan, procedures, staff training, and communication to customers and colleagues.</li> </ul>  |
| <b>Legal Entity Responsible person (Director compliance, AD Compliance) or equivalent</b> | <ul style="list-style-type: none"> <li>Act as the Groups lead advisors.</li> <li>The named Responsible Person “competent person” for the purposes of the Gas Safety Regs.</li> <li>Establish &amp; maintain Gas Safe registration.</li> <li>Maintain a process for dealing with unsafe situations or incidents in accordance with the Gas Industry Unsafe Situations Procedure</li> <li>Implementation of technical protocol.</li> </ul>   |
| <b>Compliance Manager (Fire Strategy &amp; Delivery)</b>                                  | <ul style="list-style-type: none"> <li>Manage the risk with compliance with gas safety regs,</li> <li>Monitor the controls and compliance with management plan.</li> <li>Develop risk reduction strategy and setting our management response to our legal requirements.</li> <li>Management of Legal action/ tenancy enforcement.</li> <li>keep up-to-date a record of all installations and equipment and landlord gas safety records (LGSR)</li> <li>Management of commercial heating servicing and safety checks</li> </ul> |
| <b>Operations Head of Heating &amp; Electrical or equivalent</b>                          | <ul style="list-style-type: none"> <li>Monitoring technical competence for gas engineers to ensure appropriate qualifications and experience for allocated gas work</li> <li>Management of cyclical programme of servicing and safety checks for domestic heating installations</li> </ul>   |
| <b>Operations Gas / Heating Compliance Manager</b>  | <ul style="list-style-type: none"> <li>First line Quality Assurance testing of landlord gas safety records.</li> <li>Monitoring / allocation of resources</li> </ul>   |
| <b>Head of Business Management</b>  | <ul style="list-style-type: none"> <li>Implement the groups assurance framework through 3 lines of defence</li> <li>Governance reporting through Independent Reporting through Business Intelligence</li> <li>3rd Party quality assurance testing.</li> </ul>  |
| <b>3rd Party Consultant</b>   | <ul style="list-style-type: none"> <li>Provide independent / 3<sup>rd</sup> party competent person advise</li> <li>Undertake periodic reviews of management plans</li> <li>Complete 3<sup>rd</sup> party quality assurance reviews of LGSRs.</li> </ul>  |

## 6. Risks

Whilst the strategic approach to Building Safety is not risk averse in terms of adopting innovation and striving to be a leader in the sector, the safety of Riverside customers and

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colleagues is a key priority for the organisation. Therefore, there is no appetite for risk in terms of building safety and compliance within the law.

There is however a tolerance for risk in adopting a proportionate approach to building safety activities, risk assessment and the controls implemented.

Key risks are monitored through a set of monthly Key Performance Indicators (KPI's). The suite of KPI's is embedded with the executive management and governance reporting structure.

A building safety risk register is maintained and regularly reviewed to ensure a proactive approach to risk identification, reduction, and control.

### 7. Appeal & Complaints

We aim to meet all our obligations to keep our buildings, customers and colleagues safe. To maintain an effective safety testing, installation, maintenance, and servicing regime as detailed in this policy. We will respond to complaints regarding safety concerns in line with our Complaints Policy and Customer Feedback Procedure.

### 8. Equality, Diversity and Inclusion

Riverside is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities, and organisations, considering the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with Riverside's Equality, Diversity and Inclusion Policy and has been subject to an Equality Impact Assessment.

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