

Gas Servicing Policy

Policy Statement

Purpose

As owners and managers of property we have a duty of care to ensure that customers, visitors and colleagues can use our buildings and facilities safely. This extends to ensuring that residents and visitors are safe from risks associated with gas appliances.

Legal Obligations

We will comply with our duties for repairs and maintenance as set out in the Landlord and Tenant Act 1985 and the Housing Acts 1985 and 1988 (as amended). In addition, we will comply with:

- Health and Safety legislation, including the Management of Health and Safety at Work regulations 1999 and the Workplace (Health, Safety & Welfare) Regulations 1992 (as amended)
- Gas Safety Installation and Use Regulations 1998, amended 2018
- Gas Safety (Management) Regulations 1994
- Construction (Design and Management) Regulations 2015 (CDM 2015)
- Gas Safe Register rules relating to engineer competence and certification

Orwell's Commitment

We will ensure that annual gas safety checks are carried out every 12 months by a registered Gas Safe Engineer and will include taking appropriate action to gain access where necessary in accordance with our gas safety procedures.

We will carry out gas safety checks within a window of between 10 and 12 months after the previous check. Checks will be treated as if they were carried out on the last day of that 12 months, preserving the existing expiry date of the safety check record (in the same way as a car MOT).

We will ensure that Orwell's gas appliances, pipework and flues are prepared and maintained to approved standards.

We will procure and manage contractors appropriately, ensuring that they are qualified and registered to do the work required of them, in particular registered with Gas Safe or other approved credited bodies in place at the time.

We will keep detailed property records, including keeping records of gas safety checks for two years, and monitor our level of compliance on an ongoing basis with a target of 100%.

We will communicate risks associated with gas appliances to our customers, along with Orwell's actions to mitigate them and our customers' responsibilities.

We will ensure all gas servicing and repairs will be carried out only by engineers who are personally registered with the Gas Safe Register.

Orwell will verify the following for every engineer:

- Individual Gas Safe registration number
- Qualifications held, including appliance categories
- Qualification expiry dates
- Annual re-verification of competence

Where subcontractors are used, the individual engineer, not only their employer, must hold valid Gas Safe registration.

Where an appliance, flue, or installation is assessed as unsafe, Orwell will immediately isolate or disconnect the affected system in accordance with HSE expectations.

Unsafe situations will be escalated promptly, remedial action will be prioritised, and safety will not be compromised under any circumstances. Tenants will be kept informed of any urgent actions taken.

Orwell will maintain strong governance arrangements for gas compliance, including:

- Monthly compliance performance reporting
- Annual independent audits of gas servicing work
- Annual verification of engineer competence and Gas Safe credentials
- KPIs covering access, servicing completion, defect resolution, and compliance rates
- Board oversight of compliance performance, risk, and assurance.

The Responsible Person and Responsible Manager will ensure regular monitoring, escalation of concerns, and continuous improvement in line with regulatory expectations and best practice.

Prior to letting, we will ensure that all properties have a valid LGSR Gas Safety (CP12) certificate and have undergone a gas safety check before the new tenancy commences

We will ensure that a gas safety check takes place prior to a mutual exchange taking place and issue a new LGSR Gas Safety (CP12) certificate.

We will arrange for an independent inspector to survey the work of Orwell's gas maintenance contractors annually to ensure high standards are continuing to be met.

We will undertake an Equalities Impact Assessment on our gas safety procedure to ensure that it does not unfairly discriminate any customer group or exclude any customer groups. This is in line with our commitment to Equality, Diversity and Inclusion.

Leaseholders will be given the opportunity to access gas servicing provided by our contractors.

Responsibilities

Lines of Responsibility

Orwell Housing's duty to maintain and implement the Gas Servicing Policy falls under the remit of the Compliance & Planned Works Manager. The Compliance and Planned Works Manager is the named Responsible Manager and will implement the control measures as detailed in this document reporting to the Head of Property, who will cascade all information to the Responsible Person and Duty Holder.

Duty Holder

The Duty Holder has a responsibility to support this policy by ensuring the allocation of resources including an adequate budget, suitable and sufficient equipment, personnel, time, and training.

In particular they will:

- Ensure that resources are made available to allow the actions and measures detailed in this policy and any associated procedures to be effectively delivered.
- Delegate their responsibilities for the for the delivery of services in line with policy and procedures to the Assistant Director of Property Services, Head of the Property and the Compliance & Planned Manager, however, will retain an oversight on progress/ performance.
- Eliminate Risk wherever possible.
- Appoint appropriate 'Responsible Persons' to oversee, control and coordinate the control of the risk.

The Duty Holder is: Chief Executive.

Responsible Person

The Responsible Person has been given their authority by the Duty Holder. The position carries with it the authority to put into effect such measures as are required to control the risk and ensure statutory and regulatory regulations implemented and followed both as a matter of routine and in the event of a crisis.

The Responsible Person will work closely with the Head of Property and the Compliance & Planned Works Manager to seek assurances that regulatory obligations and policy measures are being adhered to and services delivered in line with budget. They will check monthly reports compiled for board members to ensure compliance with statutory and contractual obligations.

The Responsible Person also has a responsibility to ensure records are kept to confirm that this policy has been implemented. The Responsible Person has the overriding authority for the control of Gas Safety to ensure that all Orwell Housing Association properties meet the requirements of Gas Safety and this policy. The Responsible Person is required to ensure that nominated OHA staff are trained and competent to carry out the prescribed task on their behalf and to ensure that the Responsible Person tasks and requirements are duly met.

The Responsible Person is: Assistant Director of Property Services.

Responsible Manager

The Responsible Manager has been given their authority by the “Responsible Person” to act on their behalf to oversee the day-to-day management of Gas Servicing for Orwell Housing Association. This person has responsibility for overseeing and coordinating the Gas Servicing Policy and Procedure. This position carries with it the authority to put into effect such measures as are required to control the risk of Gas Servicing, both as a matter of routine and in the event of a crisis. The Responsible Manager also has a responsibility to ensure records are kept confirming that this policy has been implemented.

They have the responsibility for the day-to-day management including ensuring that the scheme of precautions to control the risk of gas servicing is implemented fully by competent persons, whether directly employed by Orwell Housing Association, contracted, or subcontracted.

In particular they will:

- Regularly review this policy and ensure its objective are achieved.
- Prepare compliance performance reporting to the Assistant Director of Property Services, the Head of Property, Chief Executive, and the Board as required and not less than monthly.
- Ensure that any compliance and/or H&S related issues are brought to the attention of the Assistant Director of Property Services, the Head of Property and provide regular updates on service delivery.
- Effectively manage the performance of the service delivery contractors, including their ongoing competence, and proactively monitor service delivery against targets.
- Be responsible for monitoring the quality of work undertaken by the contractor and ensuring all servicing certification is received and verified
- Act as the organisation lead for gas safety, ensuring that OHA continue to work in line with the most up to date regulations and industry guidance.
- Manage the performance of gas servicing contractors, supported by a suite of internal metrics and KPI dashboards. Monthly Operational Meetings are held with contractors within which performance is discussed and documented, with procedures in place to take more formal action to address performance issues if required.
- Work closely with the Housing Services Manager and the Head of Customers & Communities on requests to take forced measures to gain access/make safe. They will maintain an oversight of those properties with a capped gas supply and seek assurances from the Housing Services Manager that appropriate action is being taken to support affected customers.
- Oversee the control and management of Gas Safety Regulation on behalf of the Duty Holder.
- Ensure that gas safety checks are carried out on behalf of the Duty Holder.

The Responsible Manager: Compliance & Planned Works Manager.

Compliance & Servicing Team Leader

Compliance & Servicing Team Leader will be responsible for the day-to-day operational delivery of all gas and heating-related servicing and maintenance.

In particular they will:

- Be responsible for monitoring the quality of work undertaken by the contractor and ensuring all servicing certification is received and verified.
- Ensure the Compliance Team maintain a register of all Gas businesses and engineers carrying out works for OHA. This will include the specific qualifications of the engineers and the expiration date. Processes will be in place to ensure that the register is kept up to date, e.g., new engineers are added, and that evidenced is obtained of renewed qualifications.
- Carry out on an annual basis a full property reconciliation will be carried out. This will reconcile the information within CX against Asprey Asset Management System to ensure all applicable building and properties remain captured in the relevant servicing schedule.
- Inform the Responsible Manager of any problems, discrepancies, or anomalies.

Gas Servicing Contractor

The contractor has responsibility for carrying out the gas servicing of all properties with gas connections as instructed by OHA.

In particular they will:

- Organise initial appointments with customers and schemes to ensure that the servicing is completed in the necessary timeframes to ensure OHA comply with the Gas Safety Regulations.
- Carry out the necessary attempts to make appointments in line with OHA procedures. Inform the Compliance Team of no access properties at the earliest opportunity to ensure OHA can begin their access procedures.
- Provide weekly servicing updates to the Compliance Team on current position with all properties and notify of any problems, discrepancies or anomalies.
- Ensure that all engineers have the correct qualifications and memberships to work on the various system to be serviced.
- Carried out for the safe servicing of gas appliances implementing any required safe working practices.
- Complete and maintain records as required.
- Attend monthly contract meeting to discuss and document performance of servicing contract.

Policy Monitoring and Review

The Assistant Director of Property Services has overall responsibility for taking all reasonable steps to ensure that this policy is complied with.

The policy will be formally reviewed and updated every three years by the Responsible Manager, or sooner if deemed appropriate, or by reasonable request.