



# Gas Safety Management Plan

## (Supporting the Gas Safety Policy)

If you have difficulty with reading this management plan, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

# Our Vision, Our Values, Our Strategic Objectives

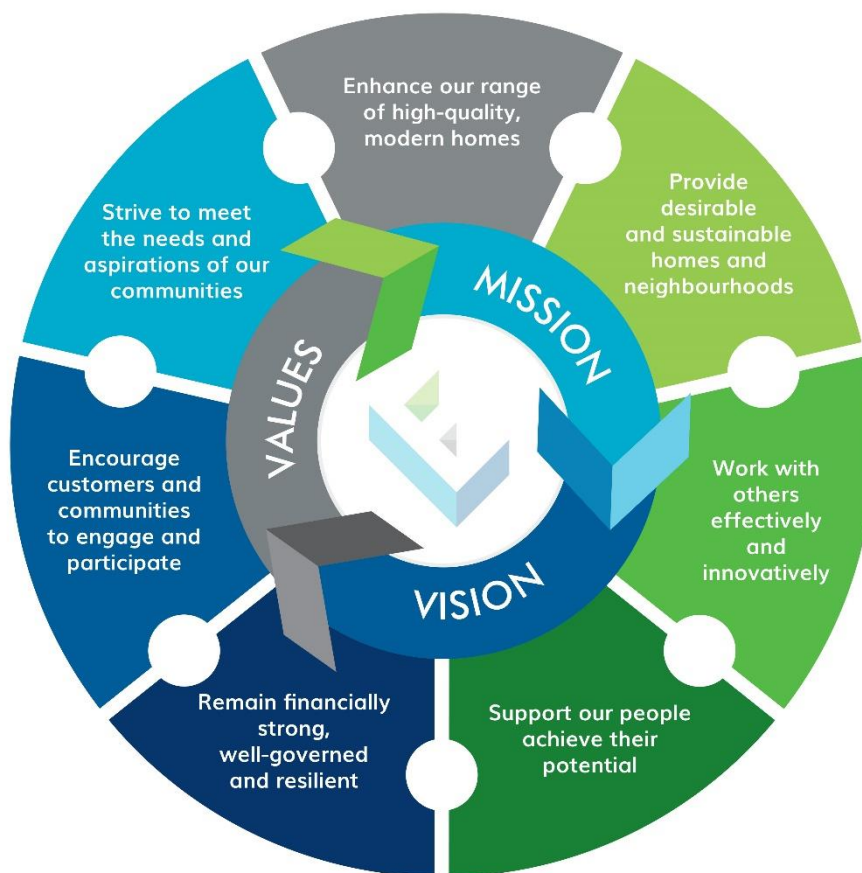
## Our Vision

A vibrant neighbourhood where everyone can prosper.

## Our Values

Caring, Reliable, Fair, Open and Adaptable

## Our Strategic Objectives



## Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Management Plan and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Management Plan.

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## 1. Introduction and Link to Gas Safety Policy

- 1.1 Elderpark Housing has a statutory duty as an employer, a landlord and registered provider of social housing to ensure the health, safety and wellbeing of its employees, customers and “other” stakeholders in respect of managing gas safety within its properties and workplaces (this can include contractors, visitors and members of the public).
- 1.2 This management plan should be read in conjunction with the Gas Safety Policy which defines our overall approach to managing gas safety within our relevant properties to the required legislation. The Policy defines the scope in terms of relevant properties, work streams and people to whom it applies.
- 1.3 This management plan underpins the Gas Safety Policy and contains additional detail of the management arrangements we have in place, to enable Elderpark Housing to comply with all Legislation and standards relating to gas safety and the policy.
- 1.4 All Elderpark Housing staff who have any responsibility for the management of gas safety across the organisation, will be required to have read and understood both this Gas Safety Management Plan and the Gas Safety Policy. They will need to ensure that all relevant staff within their team have read both documents.

## 2. Legal and Regulatory Framework

- 2.1 The Gas Safety Policy sets out the Scottish Housing Regulators framework, including the 7 Regulatory standards and how they apply to Gas safety within Elderpark Housing.
- 2.2 The Gas Safety Policy explains the key legislation in place which Elderpark must comply with as an employer and registered landlord of social housing, which is listed below:
  - Health and Safety at Work Act 1974
  - Management of Health and Safety at Work Regulations 1999
  - Gas Safety (Installation and Use) Regulations 1998
  - Equality Act 2010
  - The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (2013) (RIDDOR)
  - Compliance with HETAS guidance (solid fuel systems)
  - L56 Approved Code of Practice (ACOP)- Safety in the installation and use of gas systems and appliances Gas Safety (Installation and Use) Regulations 1998
  - L122 Approved Code of Practice (ACOP) – Pressure Systems Safety Regulations

- The Gas Industry Unsafe Situations Procedures (GIUSP)
- Scottish Social Housing Charter (SHQS)

2.3 In addition to these key pieces of legislation there are other associated regulations, standards and guidance which are applicable to Gas safety, these are:

- Building Standards (Scotland) Regulations 2014
- Pressure Systems Safety Regulations 2000
- Gas Safety (Management) Regulations 1996
- The Dangerous Substances and Explosive Atmosphere Regulations 2002 (DSEARR)
- Construction, (Design and Management) Regulations 2015
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Safety in the Installation and use of Gas Systems and Appliances
- IGEM/ G/ 11 The current Gas Industry Unsafe Situations Procedures (GIUSP)
- Guidance leaflet INDG285 (rev 3): A Guide to Landlord's Duties
- Technical bulletins and industry safety alerts (Gas safe)
- The Corporate Manslaughter and Corporate Homicide Act 2007
- L80: A Guide to the Gas Safety (Management) Regulations 1996
- The Association of Independent Chimney Sweeps' Code of Practise
- Control of Substances Hazardous to Health Regulations 2002
- Control of Asbestos Regulations (CAR) 2012
- Provision and Use of Work Equipment Regulations 1998
- Personal Protective Equipment Regulations 1992

### **3. Roles and Responsibilities**

3.1 The Gas Safety Policy contains details of key roles and responsibilities associated with managing Gas safety for Elderpark Housing.

### **4. Aims and Objectives of this Management Plan**

4.1 The aim of this management plan is to support the Gas Safety Policy in giving more detailed arrangements that Elderpark Housing will have in place to enable us to meet all legal and regulatory obligations and ensure best practice is followed in relation to Gas safety. We aim to:

- Keep the general public, tenants, and employees aware of the risks associated with gas installations and appliances and, as far as reasonably practical, ensure their health, safety and wellbeing in relation to Gas safety.
- Set out a clear approach to assessing, controlling, and monitoring the risks associated with gas installations and appliances within Elderpark's properties and office premises.

- Communicate with tenants and staff the importance of gas safety including providing guidance, training and emergency procedures.
- Ensure that all procedures relating to the Gas Safety Policy support the fair treatment of all tenants with respect to their different needs, circumstances, and lifestyle.

4.2 To meet our aims, we have set the following objectives to be achieved:

- We will carry out an annual gas safety check and service and produce a valid landlord gas safety record (LGSR) for all domestic properties containing a gas supply and in relation to all gas appliances, flues and fittings. We will remediate all defects which are deemed unsafe (At Risk – AR and Immediately Dangerous – ID) in a reasonably practicable timescale to demonstrate all appliances are safe to use.
- Develop and maintain a register listing all domestic properties and the office, with gas installations that Elderpark are responsible for including date of the last LGSR to enable these to be completed before the anniversary date within 12 months.
- Ensure Tenants own gas appliances (e.g. gas hob) receive a visual inspection during the annual safety check and service visit.
- Ensure tenants are clear on their responsibilities to only use competent Gas Safe registered contractors when installing or renewing appliances owned by them (e.g. gas cooker).
- Promptly react to any report of “no heating” or “no hot water” to repair any defective part of a gas heating installation in accordance with priority repair timescales and resume service for the customer as soon as possible.
- Ensure any unauthorised and defective alterations or additions to gas installations are rectified or removed on discovery.
- Only appoint competent gas contractors registered Gas Safe who have evidenced their competency and qualifications
- Ensure that contracts with external contractors are managed effectively and robust contract monitoring is in place to monitor performance and promote continuous improvement.
- Identify an appropriate staff training programme to be implemented so that staff are aware of their responsibilities in relation to Gas safety

- Respond to any amendments in the legislation and guidance with regards to Gas safety to ensure that legislative standards are met
- Report regularly to the Management Committee of performance measures associated with gas safety.
- Ensuring that all works in relation to Gas safety meet current regulations and legislation and are carried out by reputable and qualified persons.
- Regularly inspecting our properties and their immediate environment to ensure they are free from risks which could increase the risk of fire including Gas installations, and subject to regular inspection and renewal.
- Identifying, assessing, and managing any potential sources of risk.
- Communicating Gas safety tips and information to the public via our website, social media, and written communication.

## **5. Gas Asset Register**

- 5.1 Elderpark will operate and maintain a robust gas asset register of all properties which contain a gas supply, gas appliance and any other gas associated components which require annual safety checking and maintaining.

### **Properties falling within scope of the Policy and Management Plan**

- 5.2 We will maintain a record of all owned and managed properties which will be defined within the system as to whether the annual gas safety checks and servicing responsibilities belong to Elderpark or another party (e.g. where we are leasing the building from the freeholder). The list of properties to which the policy and management plan apply are listed below:

- Domestic properties with gas supplies, gas appliances and associated gas components
- Offices (workplace)

### **Domestic Properties**

- 5.3 As defined within the scope of the Gas Safety Policy and detail within this management plan, we will ensure that all domestic properties with a gas supply and gas appliances, where it is defined as our responsibility (where we are the freeholder), will be subject to an annual gas safety check and service of appliances, inclusive of a gas tightness test, as this is completed we will ensure a valid LGSR is produced before the anniversary of the previous LGSR.



### **Tenants Own Appliances**

- 5.4 Where there are any gas appliances installed within a property which are the property and responsibility of the tenant (tenants' own appliance e.g. gas cooker or gas hob) these will be inspected on a "visual only" basis in line with Gas Safety Technical Bulletin TB055 and Gas Industry Unsafe Situations Procedure (GIUSP). We will encourage our gas contractor to record these appliances on the LGSR, but TB055 and GIUSP state that these should be recorded as NA on the LGSR against "appliance safe to use", as they have not had full safety checks carried out and only a visual inspection.
- 5.5 We will actively encourage tenants to ensure they use a competent Gas Safe registered engineer when installing, removing or renewing tenants own gas appliances within our properties.

### **Void Gas Safety Checks**

- 5.6 We will ensure at the end of each tenancy for all properties, that a full gas safety check is made at each property before the new customer moves in, to ensure the previous tenant has left the gas appliances and installation in a safe manner. All At Risk and Immediately Dangerous defects will be remediated and a valid LGSR will be supplied to the new tenant within 28 days. This shall become the "relevant" anniversary date for the next annual service. A copy of the LGSR shall also be provided for inclusion in the void pack that is passed to the Housing Officer for issue to the new tenant as part of the sign-up process.

### **Offices**

- 5.7 As defined within the scope of the Gas Safety Policy and detail within this management plan, we will ensure that all Offices (Any buildings used as a place of work) with a gas supply and appliances, where it is defined as our responsibility (where we are the freeholder) will be subject to an annual gas safety check where a valid LGSR is produced, inclusive of remediating all At Risk and Immediately Dangerous defects
- 5.8 Where we are not the freeholder (for example we are leasing a building from another organisation) we will understand who has the responsibility for gas safety on an individual basis and ensure the asset register reflects this responsibility. Where the responsibility lies with another organisation (e.g. they are the freeholder or with a managing agent) we will ensure we obtain copies of the new valid LGSR before the expiry of the previous certificate.

### **Updating the gas asset database**

- 5.9 Within this database we will record details of all gas appliances and components that are within the properties, such as boilers and gas fires.

5.10 The database containing all gas assets will be updated in all of the following circumstances:

- When a property acquisition or disposal takes place
- When a new gas installation is installed e.g. boiler renewal.
- When any changes are made or identified as part of the annual safety check programme
- When a void safety check takes place and new LGSR is produced.
- When any changes are made, or identified or components or full replacement is made during capital investment works e.g. Heating renewal to an alternative fuel source

## **6. Annual Gas Safety and Maintenance - LGSR Programme**

### **Definition and format of an LGSR**

6.1 A Landlord Gas Safety Record (LGSR) is a document required by GSIUR (as amended) to ensure appropriate safety checks have been carried out by a suitably qualified gas engineer, who must be registered with Gas Safe.

6.2 LGSR's are available in many formats, both handwritten and digital formats are available, from a number of suppliers. Elderpark will only use digital copies where possible across all work streams, the only handwritten copies will be by exception. This is to ensure legible accurate copies are obtained, and can be easily read, stored, reproduced when required and shared more easily than hard copies.

### **Statutory requirements – Annual Safety Inspection and Effective ongoing maintenance**

6.3 There are two distinct, but separate duties required of a landlord, as stipulated in Regulation 36 of GSIUR and L56 (ACOP), these are:

1. Effective ongoing maintenance of all flues, appliances, and gas fittings (service and maintenance)
2. The annual gas safety check (inspection), of all flues and appliances (LGSR programme)

6.4 For the purpose of efficiency, Elderpark will ensure the contractor is instructed to carry out the effective ongoing maintenance checks as part of the annual safety check visit. The contractor will be requested to service the installation and appliances to the manufacturer's instructions at the same visit and indicate on the LGSR that the service has been completed.

6.5 Effective ongoing maintenance of appliances, flues and fittings will be carried out in line with manufacturer's instructions, together with any necessary remedial work. In the

absence of specific manufacturers' instructions, effective maintenance should include as a minimum:

- Examination of the physical condition and safe functioning of appliance(s), installation pipework, ventilation, and any flue for deterioration.
- Carrying out performance tests.
- Taking the necessary remedial action.

### Frequency and timescale of the Annual Safety Check and Maintenance

- 6.6 Regulation 36 section 3 of GSIUR and L56 (ACOP) stipulates that all gas appliances, flues and fittings must be safety checked within 12 months from the installation and within 12 months of the previous checks (there is an amendment to this regulation which gives a different option, see Regulation 36A amendment below), Elderpark currently work to Regulation 36 section 3 and not the amendment 36A.

### Regulation 36A amendment (MOT style servicing)

- 6.7 Amendments came into force in April 2018 to Regulation 36 section 3 of the GSIUR and are referred to as the "Regulation 36 A amendment". The main objective and intended effect of the amendments were to allow flexibility in the timing of landlord's gas safety checks and prevent any unnecessary shortening of the annual gas safety check cycle (similar to the process of having a car MOT completed up to a month early whilst still preserving the MOT date – hence the gas industry sometimes referring to this as the MOT style gas servicing).
- 6.8 This amendment to the regulation sets out when the next safety check must be completed in order to retain the existing deadline date. It also sets out a one-off flexibility that landlords can use to align the date of an appliance check with that of other appliances at the same premises.
- 6.9 **There is no legal requirement to work to the amendment Regulation 36A, [RH1][BP2] and Elderpark do not currently work to the amendment.** There are specific rules associated with operating to the Regulation 36A amendment which would require significant planning to switch to this method and robust systems would need to be in place to adhere to the rules associated with operating to this method. Elderpark works to the traditional Regulation 36 section 3 method of completing the gas service and safety check and utilising the completion date as the anniversary of when the next safety check and service needs to be completed.

### Planned Annual domestic LGSR Programme

- 6.10 The planned programme of service visits is included in the gas database and is determined by last annual or change of tenancy gas safety visit. It is intended that the

servicing process shall commence 2 months prior to the annual anniversary date of the previous service. This will allow for managing any no access, arranging forced access or possible legal actions. This programme will be maintained each year, and where properties have been serviced out of sequence (for example change of tenancy, new boiler, etc) they will be included and programmed accordingly to meet the anniversary date of the last service or safety check.

### **Tenant Communication and Access Attempts**

- 6.11 Elderpark's appointed gas contractor will issue letters to properties 10 months after their last annual service. These letters, giving one weeks' notice, will inform tenants of the service date the gas contractor intends to carry out the service. The dates for the first attempt to service the appliance (s) will be available to Elderpark's Maintenance Team via the contractor's on-line portal.
- 6.12 Each month a separate list of planned services will be created on the Gas Maintenance Database. Each monthly list will include all properties within that month that's due an annual gas safety check.
- 6.13 Following the initial contractors letter the Gas Servicing Contractor will carry out the annual safety check and servicing in accordance with GSIUR and Gas Safe Register requirements and the work instructions for safety checking and servicing the gas appliances and supply pipework.
- 6.14 During the course of the gas service visit the Gas Engineer will carry out a safety inspection of any non-Association gas appliances in the property and check (or replace if required) the carbon monoxide, heat and smoke detectors.
- 6.15 In the event of a no access, the Gas Engineer will complete a maintenance visit slip and leave at the premises with a rearranged visit planned in 7 days, if the 2nd visit is also a no access the Engineer will leave a further card advising of another visit in 7 days. Following 3 no accesses, the tenancy details will be passed to Elderpark for further action. Each no access shall be recorded in the contractor's on-line portal. In other circumstances laid out by Elderpark, the Gas Engineer will phone Elderpark and provide an up-to-date situation.
- 6.16 Elderpark acknowledges that in some instances access is difficult due to the tenants' work pattern not fitting with the Gas servicing contractors' hours of operation. This is normally business hours between 8.00 am and 4.30 pm. The tenant should notify the association that the prescribed time is not a suitable time due to work commitments. When this information is relayed to Elderpark we shall request a Saturday morning or after-hours service to be carried out Monday to Thursday, as long as that arrangement does not surpass the annual anniversary date to meet our legal duty.

## Certification and Recording of the Annual Safety Check and Service

6.17 Following completion of the Appliance Servicing & Safety check the Gas Engineer will:

- Complete a Landlord's Gas Safety Record (LGSR).
- Issue a copy record to the tenant; [RH3][BP4]
- GSC Administration Team will forward original (or electronic) copy to Elderpark for recording and filing.

## Detecting gas leaks - Tightness test of the domestic gas pipework and installation

6.18 Whilst it is not a legal requirement of the annual safety check, to have a tightness test carried out (to ensure there are no gas leaks to the installation pipework or appliances), Gas Safe and HSE strongly recommend having a tightness test completed at the same time as the annual service. Maintaining the gas pipework is a requirement of the effective ongoing maintenance of the gas installation. Elderpark will ensure all annual safety checks include for a tightness test to be completed in line with the latest IGEM standards and the contractor will be instructed to ensure the results are clearly marked on the LGSR (or similar record for commercial sites) as a pass or fail. Any failure will require the contractor to investigate the failed tightness test and rectify the issue appropriately in line with GSIUR and the Gas Safety Unsafe Situations Procedure (GIUSP).

## Completing an LGSR to the required standard (9 salient points)

6.19 Regulation 36 3 (c) of the Gas Safety Installation and Use Regulations, L56 ACOP, and technical bulletin TB055 requires landlords to ensure the following points are all captured on an LGSR when having a safety check carried out:

- (i) the date on which the appliance or flue was checked.
- (ii) the address of the premises at which the appliance or flue is installed.
- (iii) the name and address of the landlord of the premises at which the appliance or flue is installed.
- (iv) a description of and the location of each appliance or flue checked.
- (v) any safety defect identified.
- (vi) any remedial action taken; GSIUR Guidance 36(1)– (2) Regulation 36(1)– (2) ACOP 36(1)– (2) Regulation 36(3)– (4) 1 Regulation 36(3) was amended by the Gas Safety (Installation and Use) (Amendment) Regulations 2018. 70 Safety in the installation and use of gas systems and appliances
- (vii) confirmation that the check undertaken complies with regulation 26 (9) of GSIUR.
- (viii) the name and signature of the individual carrying out the check; and
- (ix) the registration number with which that individual, or his employer, is registered with a body approved by the Executive for the purposes of regulation 3(3) of the GSIUR Regulations

6.20 Elderpark will ensure the contractor is recording the 9 salient points above on each LGSR completed. Upon completion of the annual service, the Gas Engineer will complete a Landlord Gas Safety Record (LGSR) and will request the customer to sign it. There are options on the certificate to record if the customer is unable to sign.

#### **Issuing customers a copy of the LGSR within 28 days**

6.21 As stated above, we will endeavour to ensure all LGSR's are digital copies to enable the efficient sharing and sending of documents back to the office and issue an onward copy to customers.

6.22 Elderpark will ensure all tenants receive a copy of the new LGSR within 28 days of the annual safety check and service being completed, the sending of a record within 28 days is a requirement under the Gas Safety Installation and Use Regulation 36 (this can be hard copy or digital copy but must be receivable by the customer).

## **7. No Access and Forced Entry Arrangements**

7.1 As a final measure to ensure the Association's compliance with its statutory obligations, we will consider forcing entry to carry out this work in line with section 4.12 of the Gas Safety Policy. Every effort will be made to avoid this, through written correspondence and other appropriate methods of communication.

7.2 Between each of the required actions detailed below, a maximum of 7 days should be allowed.

- **Action 1** – Tenants receive a letter giving 7 days' notice of their planned service date from the Gas contractor
- **Action 2** – If no access on initial visit, engineer will leave a calling card advising of the next planned visit in 7 days' time.
- **Action 3** – If no access at 2nd visit, the engineer will leave a further card advising of third planned visit in 7 days.
- **Action 4** – If no access at 3rd visit, the contractor shall forward address details to Elderpark.
- **Action 5** – Elderpark will attempt to contact the tenant by phone, text messaging, email or letter requesting that the tenant contacts to make arrangements for access for this work.
- **Action 6** – If no response from tenant after 7 days from action 5, a further reminder shall be sent.

- **Action 7** – If still no response after a further 7 days, the association shall send notification that further failure to respond may result in forced access for this essential service to be completed (Appendix 4). During actions 5, 6 and 7 the maintenance assistant inform housing colleagues to determine if property occupied or possibly abandoned. For example, if contact has been made, repairs reported, etc.
- **Action 8** – If still no response, then 48 hours prior to the anniversary date a hand delivered letter providing notification of the intention to force entry (Appendix 5) will be issued (only if gas meter is internal). Elderpark’s forced entry procedures shall be adhered to. In addition to this, the following actions should be carried out:
  - The lock changed (if tenant not present and entry has been forced).
  - Notification left pinned to the door (Appendix 6) that the locks have been changed and the service/safety check carried out, along with details of what the tenant must do next (contact the office to collect the new keys).
  - Maintenance Staff along with the gas engineer to remain in attendance whilst gas service is carried out, property vacated and secured.
  - Where there is no gas and /or power supply present at time of forced entry and service, the supply piping from the meter will be “capped” on the Association’s side of the meter. The CP12 shall record that the service was aborted. The tenant will have to contact the association direct to un-cap their supply to allow the appliance to be serviced.
- **Action 9** – When forcing entry, the member of staff present will photograph any pre-existing damage as well as record what was done in the house and any damage caused by the HA and/or its contractors as a result of the process of forcing access.
- **Action 10** – If a tenant makes, then breaks an arrangement for access the HA will move on to the next stage as if no arrangement had been made.

## 8. Logging of Completed Annual Safety Check/ Servicing Dates and Records

- 8.1 The GSC Administration Team will ensure that gas service job orders are logged as complete, and the gas safety certificate returned to Elderpark within 7 working days of the completed service or available for download from the contractors on line portal.
- 8.2 Following return of the Gas Appliance Service/Safety Record to Elderpark, who will, at least weekly:
  - Log the Gas Appliance Inspection/Servicing date on Rubixx Housing Management System

- Save the Landlords Gas Safety Record (LGSR) into Rubixx Housing Management System
- Produce weekly reports for the Maintenance Services Manager
- Update the gas servicing database with service date, next anniversary date and include details of any new properties and or any new installations.

### **Storing LGSR Records – 3 Years**

8.3 Regulation 36 3 (c) states we must:

“ensure that a record in respect of any appliance or flue so checked is made and retained until there have been two further checks of the appliance or flue under this paragraph or, in respect of an appliance or flue that is removed from the premises, for a period of 2 years from the date of the last check of that appliance or flue, which record shall include the following information”.

8.4 Elderpark will therefore ensure electronic copies of LGSR Certificates are held on the Housing Management System for a minimum of three years.

## **9. Unsafe Situations (At Risk – AR and Immediately Dangerous - ID)**

9.1 There are 2 defect categories of unsafe situations listed under the Gas Safety (Installation and Use) Regs 1998 Industry. These are listed as and At Risk (AR) and Immediately Dangerous (ID).

9.2 Where an ID has been recorded, this is deemed as dangerous and if operated or left connected to a gas supply is considered to be an immediate danger to life and property.

9.3 In the event that a Gas Engineer identifies an Immediately Dangerous situation the Gas Engineer will disconnect (with the tenant’s permission) the appliance or installation and shall report the situation to the Gas Emergency Service (Scottish Gas Network) provider as well as Elderpark HA. A “Do not Use” warning notice shall be also attached to the appliance. If the appliance continues to be used it could jeopardise the lives of those in the tenant’s home and surrounding properties.

9.4 “At Risk” situations are more recognised faults that present themselves which could constitute a danger to life or property without further faults developing. When an AR is identified the engineer with the tenant’s permission shall turn off the appliance until a repair can be carried out to rectify the fault. In some circumstances turning off the gas supply may not reduce the risk. In these situations, a warning notice “Do not use” shall be attached and reported to Elderpark HA.



- 9.5 Upon receiving an ID or AR defect staff should contact the tenant and advise that the association has been notified that their appliance is either an ID or AR. The association will instruct its Gas Safe accredited contractor to carry out remedial works to ensure that the appliance can be used, if the appliance is un-economical to repair, the association shall instruct a new appliance to be fitted.
- 9.6 Maintenance staff shall inform the tenant It is an offence to use, or allow the use of, a gas appliance known to be unsafe and in no circumstances should they reconnect an appliance that has been categorised as unsafe and has either been isolated or disconnected for safety reasons, until the fault has been rectified.
- 9.7 Temporary heaters should be offered to the tenant until the appliance is made safe or replaced.
- 9.8 In the event that a non-Association appliance is found to be unsafe (tenants' own appliances) the Gas Engineer will address the issue all as per Gas Safe Register and Gas Industry working practices. In addition, the Gas Contractor shall inform Elderpark.

## **10. Tenants Responsibilities**

- 10.1 It is the tenant's responsibility to allow the association to undertake an annual gas safety check and service all appliances belonging to Elderpark. Tenants should ensure the attending gas engineer has appropriate access to all appliances and move any obstacles which could impede the annual safety check.
- 10.2 Elderpark Housing Association is not responsible for the safety of residents' own gas appliances e.g. cookers or hobs, we will however request that the contractor carries out a visual inspection of the tenant's appliance as part of the annual safety check see section 5.4.
- 10.3 If any installation is found to be defective at the annual safety check inspection, the contractor will make safe in line with the Gas Industry Unsafe situations Procedure (GIUSP) see section 9 and specifically 9.8 for tenants' own appliances.
- 10.4 Under the terms of the Scottish Secure Tenancy Agreement Section 5 tenants must allow access to their property to carry out maintenance or safety checks.
- 10.5 In the event of continued no access to carry out the annual safety checks or remedial works to make the gas installation safe, tenants should be aware that failure to provide access is a breach of their Scottish Secure Tenancy Agreement under Section 5.12 that states: If you refuse us entry, we will have the right to make forcible entry provided we have given you every reasonable opportunity to let us in voluntarily. If we have to make forcible entry, in this situation, you are liable for the costs of any damage reasonably caused, see section 7.

## 11. Record Keeping

- 11.1 All LGSRs shall be held in electronic format, centrally stored, logged to the Register and linked to the relevant property record by unique property reference number (UPRN).
- 11.2 To ensure that any unsafe situations are recorded, a tracker will also be in place that shall note any At Risk Or Immediately Dangerous situations recorded on the LGSR and shall also track the remedial works, noting date of completion that removes the At Risk or Immediately Dangerous situations.<sup>[RH5]</sup><sup>[BP6]</sup>
- 11.3 The Housing Management System shall provide the anniversary date for each properties next LGSR test, 12 months from the previous LGSR record.
- 11.4 Elderpark will carry out a 10% inspection of LGSR certificates for compliance. These inspections shall be carried out by a competent person who is qualified and has the necessary experience to inspect and evaluate the certificates/works.

## 12. Performance and Assurance

- 12.1 Section 9 of the Gas Safety Policy contains details relating to the implementation of the policy and what levels of Governance and oversight we have in place. Section 10 of the Gas Safety Policy contains information of who is responsible for providing operational assurance information and how this will be reported.
- 12.2 In addition to those two sections of the policy we will ensure that the Management Committee will receive regular updates on the implementation of the Gas Safety Policy and any Gas Safety Reviews so that they can have assurance that it is operating effectively.
- 12.3 Performance and compliance shall be reported by the Governance and Compliance Manager at quarterly Management Committee meetings and shall include the following:
- No. of properties requiring an annual safety check (relevant domestic properties and office) with a valid in date LGSR in place
  - Any exceptional cases – e.g. any properties past the annual anniversary date<sup>[RH7]</sup><sup>[BP8]</sup>
- 12.4 Performance and compliance shall be reported by the Governance and Compliance Manager at quarterly Management Committee meetings.

## **13. Competence, Quality and Compliance Checks**

### **Checking Contractor Competency and Gas Safe Registration**

- 13.1 All contractors instructed by the Association to work with gas appliances will demonstrate to the Association that they are on the Gas Safe register of gas installers.
- 13.2 Copies of Heating Engineer's Gas Safe registration cards will be provided to the Association annually (available via a portal). Only engineers who have submitted copies of their cards may work on Association's gas appliances.

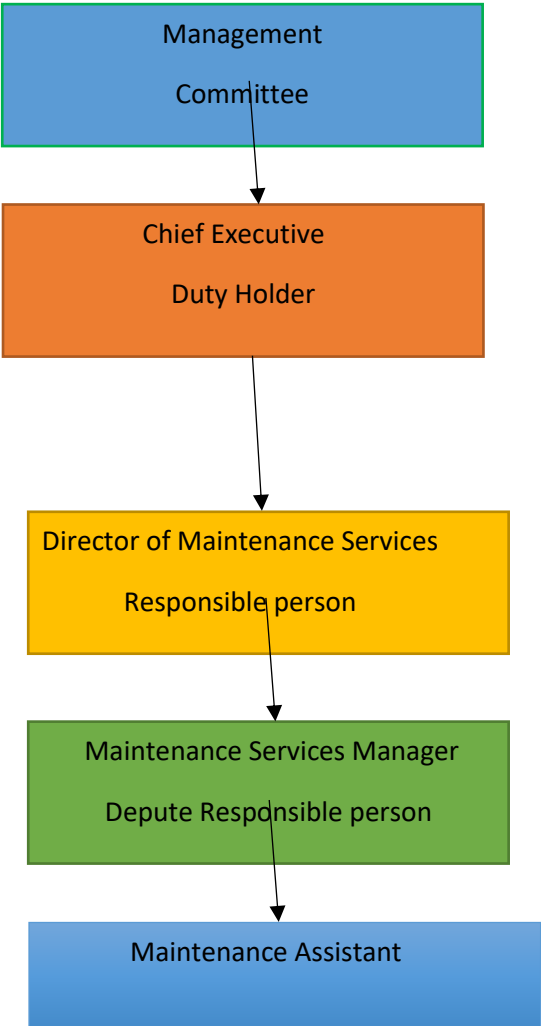
### **Quality Assurance Checks and Contractor Meetings**

- 13.3 At least 10% of Gas services/safety checks will receive a quality assurance inspection from an independent competent auditor/ inspector.
- 13.4 Monthly meetings with the gas contractor shall be held with Elderpark and its Gas auditors to ensure that the Gas contractor is maintaining competence with their Engineers and any non-compliances that require training are identified and prioritised by the Gas contractor.

## **14. Review**

- 14.1 This management plan will be reviewed periodically and when changes in legislation, good practice or operational occur, which may affect the content of this document.

**Appendix 1 – Gas Safety Management Organisational Structure**



## Appendix 2 General Letter Requesting Access

Date

Title, Surname  
1st Line of Address  
G51 XXX

Dear Title, Surname

ANNUAL GAS SERVICE

Can you please call the Maintenance Team on 0141 2244 to make an arrangement for your Annual Gas Service to be completed. This will take approximately 30 minutes to complete.

We have a legal duty to carry out this service and your appliance will be overdue on Insert Date

Please contact us to arrange a suitable time and date before the anniversary date to avoid the association utilising its Forced Entry procedures, including changing your locks.

Yours Sincerely

Lauren Herd  
Maintenance Assistant

## Appendix 3 – Forced Access Letter

Title. Initial,. Surname

1st Line address  
Glasgow  
G51 XXX

Date

Dear Title, Surname,

**Annual Landlords Gas Safety Inspection – Forced Entry**

I refer to previous correspondence regarding the above and note that you have not provided access to carry out an essential Annual Gas Service check on your gas appliances.

Arrangements have now been made to service your gas appliances on:

**Insert Time and Date** - a member of our maintenance staff will be in attendance. Should access not be made available, we will force entry and change the locks.

This will be cancelled if the service is completed sooner. If you can arrange for the service to be done sooner then please call us.

The keys to the new locks will be available at our office during normal working hours. Out with normal working hours you will need to call 0141-440-2244 to collect your new keys.

You will be billed for all costs associated with this work which could cost approximately £200.

If you require any further information with regard to this matter please call into our office at 65 Golspie Street or call 0141-440-2244.

**PLEASE DO NOT IGNORE THIS LETTER AS WE HAVE A LEGAL OBLIGATION TO COMPLETE THIS SERVICE ANNUALLY BEFORE THE ANNIVERSARY DATE.**

Yours Sincerely,

David Adam

David Adam  
Director of Maintenance

## Appendix 4 – Notice – Pinned To Door Following Forced Access

1<sup>st</sup> Line of Address  
GLASGOW  
Post Code

Friday 11<sup>th</sup> March at 3pm

Annual Landlords Gas Safety

### CHANGE OF LOCKS

A gas engineer called to service your gas appliances and was unable to gain access despite our previous correspondence.

In order to carry out this work we have forced entry to the property and the locks have been changed.

You may collect the new set of keys from our Office at 65 Golspie Street or call 0141-440-2244 during office hours 9.00am – 5pm Monday to Friday

Yours sincerely

*David Adam*

David Adam  
Director of Maintenance