

Policy Statement & Purpose

This policy explains:

Bromford are fully committed to meeting all relevant statutory & regulatory requirements, including best practice standards, in gas safety management and ensuring continual improvement in compliance performance, adopting a zero-tolerance for any non-approved deviation from this Policy.

The purpose of this policy is to demonstrate Bromford commitment to ensuring that the risk to people, buildings and the wider business are reduced as far as reasonably practicable, whilst ensuring that all legislative requirements are met. This Policy will be supported by a detailed operating procedure to ensure the Policy is fully embedded into routine working practice.

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Scope

This Policy covers Bromford and its subsidiaries.

Bromford have a duty to ensure that gas appliances, flues and associated pipework provided are safely maintained and annually safety checked by appropriately qualified contractors and engineers. We will ensure that we fully comply with our legislative and statutory duties in the maintenance of gas appliances, flues and pipework.

Our policy and processes ensure that our contractors and our own qualified engineers provide a high-quality service in terms of competence, customer advocacy and maximisation of the life of our assets and their components. The policy provides assurance to Bromford that measures are in place to ensure compliance with the regulations and to identify, manage and/or mitigate risks associated with gas fittings, combustible appliances and flues.

The policy is relevant to all Bromford employees, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon Bromford to maintain a safe environment for customers and employees within the home of each customer and within all communal areas of buildings.

Bromford will follow a systematic approach to the management of gas safety to ensure it meets the requirements set out in The Gas Safety (Installation and Use) (Amendment) Regulations 1998. This is to ensure the safety of customers, leaseholders, employees, and members of the public.

Reference Materials

| List of Referenced Documents |
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| <u>Gas Safety Procedure</u> |
| Appointment letters 1-3 |
| Legal (7 day) letter |
| Access process map |
| Capping letter |
| <u>Working around flues process maps</u> |
| Bromford Gas Safety Pre-Work Risk Assessment |
| Gas industry unsafe situations procedure |
| Occupied gas capping policy |
| <u>Mutual Exchange policy</u> |
| <u>Empty homes policy</u> |

Principles

Annual Inspection & Servicing

We will ensure that we fulfil our duties and responsibilities as a landlord as specified in the Gas Safety Regulations 1998 and all other relevant legislation by:

- Completing a gas safety check and service on all relevant appliances in Bromford maintained properties, within 12 months of installation/handover or at intervals of not more than 12 months since the last safety check.
 - Carrying out a gas safety check and service on all relevant appliances at every change of occupancy e.g., voids, mutual exchanges, transfers, decants
 - Carrying out a gas safety check and service on all relevant appliances at intervals of not more than 12 months in standing stock properties and longer-term empty homes.
 - Completing the gas safety check and service results on a Landlord Gas Safety Record and storing this document securely.
 - Providing a copy of the Landlord Gas Safety Record to customers within 28 days of completion.
 - Providing a copy of the Landlord Gas Safety Record to any new customer as part of the empty homes process.
 - Only using a competent and Gas Safe Registered engineer to complete any gas work.
 - Undertaking a 5% audit, utilising an independent third-party gas consultant on all service and safety checks relating to gas appliances and their installations.
 - Undertaking gas related repairs in line with performance targets.
 - Promptly dealing with unsafe gas situations by making them safe and carrying out repairs with agreed timescales.
 - Completing an annual service of smoke and carbon monoxide (Co) reference The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
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- Inspecting relevant properties every 12 months, which are known not to contain gas or have had installations decommissioned, to ensure that appliances or supplies have not been connected without Bromford knowledge.
 - Installing and maintaining CO detectors in all our properties where there is a fixed combustible appliance (excluding gas cookers)
 - Having a robust process for gaining access, by appointment, to conduct fuel safety checks, servicing and other works.
 - Taking appropriate legal action where customers refuse or fail to facilitate access to their home to undertake the service/safety check. This includes external and internal meters.
 - Capping off gas supplies, following an in-depth risk assessment, if access cannot be gained to carry out a safety check to mitigate risk to customers, property, or the wider neighbourhood, monitoring these properties regularly and retaining these properties on the annual servicing programme.
 - Installation of service interrupters where we encounter repeated access problems.
 - Installation of service interrupters on all new boilers fitted.
 - Monitoring customer requests to undertake work affecting any combustible appliance, installation or flue maintained by Bromford.
 - Removing open flued appliances at every opportunity (e.g., solid fuel appliances and gas fires)
 - Ensuring all new build properties in Bromford's management are included in the appropriate servicing programme for future inspection and maintenance in accordance with this Policy.
 - Encouraging leaseholders to maintain their own appliances.

Responsibilities

The Board is responsible for:

- Ensuring Bromford complies with legislation.
- Ensuring effective controls are in place to maintain compliance.
- Reviewing compliance reports and scrutinising areas of non-compliance

The Executive Team is responsible for:

- Approving this document and notifying Board of key changes to this document.
- Reviewing, endorsing, and achieving this policy's principles.
- Ensuring the appropriate resources and performance management frameworks are in place to ensure compliance with applicable laws and regulations.
- Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance.

The Audit and Risk Committee are responsible for:

- Reviewing Compliance reports and control frameworks and make recommendations to Board.
- Providing assurance to Board on compliance with all law

All colleagues are responsible for:

- Carrying out their work in line with this policy and associated procedures and processes
- Applying Bromford's DNA in everything they do
- Reporting non-compliance to line management as soon as practically possible
- Considering asset compliance in all activities and notifying compliance leads of any activity which puts compliance at risk.

Legislative or Regulatory Requirements

By following this summary guidelines, it ensures that Bromford comply with all applicable legislation and regulatory requirements, including the following:

Regulatory Standards

- The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was updated by the Homes England and Regulator of Social Housing January 2018.

Legislation

- The principal legislation applicable to this policy is The Gas Safety (Installation and Use) (Amendment) Regulations 1998. The regulations place a duty upon Bromford, as a Landlord. to ensure that gas fittings, appliances and flues are maintained in a safe condition, annual safety checks are carried out and appropriate records kept and issued or displayed to customers.

Additional Legislation

The policy also operates in the context of the following additional legislation:

- Gas Safety (Installation & Use) (Amendment) Regulations 1998
- Building Regulations 2010 including all approved documents
- British Standard 7671:2018 (18th Edition) IET Wiring Regulations
- Health & Safety at Work etc. Act 1974
- Management of Health & Safety at Work Regulations 1999
- The Construction (Design and Management) Regulations 2015
- The Housing Act 2004 – Including (HHSRS)
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

Assurance Framework

The Legal and Regulatory risk appetite of Bromford's Board is generally minimal, and it is risk averse with respect to landlord asset compliance. As such we always do everything reasonably practicable to ensure Legal and Regulatory compliance. Our compliance management comprises high-level oversight and assurance at Board and Executive level, mid-level oversight at Senior Leadership level and detailed scrutiny at management level.

This policy assists with mitigating the risk identified in our risk register, namely 'We fail to ensure safety and asset compliance across our homes resulting in death or injury to customers,

colleagues or a third party’.

Bromford has adopted the ‘three lines of assurance’ model. It is built upon Bromford’s strong control culture and organisational delegation of responsibility. It is the responsibility of managerial and supervisory colleagues within business units who use the policy to ensure that the policy is communicated and effectively implemented, and to ensure colleagues are aware of their responsibilities. Adhering to policy and underpinning procedures ensures we continue to operate within our overall risk appetite as a business.

Bromford will ensure as a minimum a representative 5% sample of independent quality assurance checks to employed contractors’ engineers on all landlords LGSR certificates to ensure that the works and certificates are completed in accordance with current legislation and codes of practice.

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