






# Gas Safety Policy and Practice

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## Gas Safety – Yesterday’s News !



**It’s all old news isn’t it.....**




**City West Housing;  
Gas Explosion,  
Salford, Nov 2010**

## The story so far.....



## Background

- National Gas Maintenance Benchmarking; Round 1 – 2009
  - 20 Social Landlords
- Development of model best practice Policy and (separate) Procedure
  - 21 Social Landlords
- National Gas Maintenance Benchmarking; Round 2 – 2010
  - 20 Social Landlords



## What's required of us.....



**Home standard Required outcomes:**

**Repairs and maintenance - Registered providers shall:**



- 1. Meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.**
- 2. Registered providers shall set out in an annual report for tenants how they are meeting these obligations and how they intend to meet them in the future. The provider shall then meet the commitments it has made to its tenants.**

## Statutory Requirements.....



- **The obvious one....**
  - Gas Safety (Installation and Use) Regulations 1998
- **Health and Safety at Work etc Act 1974**
  - Section 3; Duty to persons other than employees
  - Section 4; Person in Control of premises (non-domestic)
- **The Management of Health and Safety at Work Regulations 1999 (as amended)**
  - Reg. 3; Duty to undertake risk assessment
- **Latter two may both impose obligations in excess of that contained in the Gas Safety Regs.**

## The Importance of Policy



- Only way for the Governing Body to:
  - Know that staff understand the legal and best practice requirements upon the organisation – in detail; not generically
  - Demonstrate to the Regulator that the organisation understands this
  - Set out how it will ensure discharge of its duties
  - Set out its position on items of practice such as securing access and facilitate the involvement of tenants in these decisions
  - Allows the staff to be held to account, through appropriate performance management arrangements that test the actual application of the policy
  - Ultimately, allows self certification to the Regulator against the standard

## But not everyone measures up...



- 2009 Benchmarking results
  - Assessed against best practice matrix
    - 47.5% average score; 85% highest
- Led to us developing the 'model' policy and procedure, with subsequent changes to the assessment matrix
- 2010 Benchmarking results
  - Most had policy
  - Assessed against best practice matrix
    - 56% average score; 83% highest

## But remember....



- Policy v Practice
- Lots of social landlords do (helpful) things that aren't in their policy
  - But should be !
- Capture it, check it, 'write it down'
- Make sure IT and information flow systems are appropriate
  - Waiting for 'main' systems that might, one day, when it's been written, tested, de-bugged, re-scoped, re-written etc etc.....
  - Simple online record storage; MS Access or Excel applications

## Because....



Your staff are not supposed to be as resourceful as 007 !

## Common weaknesses...

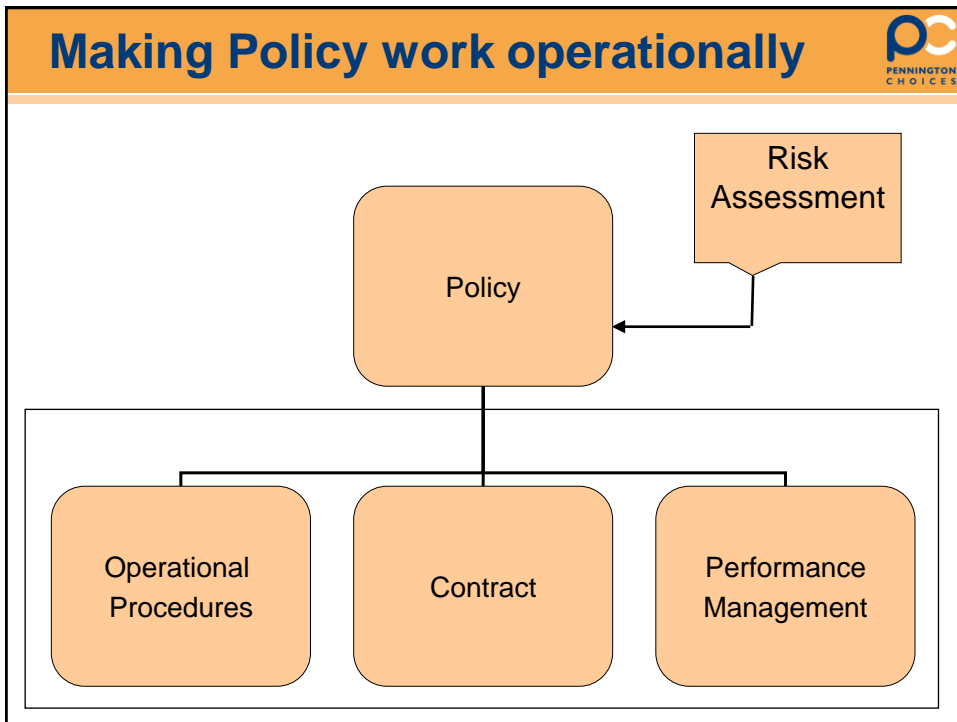


- Insufficient detail or lack of acknowledgement of the landlord's legal and regulatory requirements
- Use of informal, but arguably contentious 'no access' measures
- Mutual exchanges
- Leaseholders
- Tenants own appliances
- Assessing contractor competence
  - And in particular ongoing, post procurement
- QA, post inspections
- Education and promotion

## Things to think about....




- Tenants own appliances
  - Block of one bed flats occupied by young people, with a history of high no access, high gas faults and poor tenancy compliance; risk assessment.....
- Leaseholder
  - Lease terms, 'good' housing management by offering access to service, risk assessment
- Education / Promotion
  - To facilitate access; generally
  - To secure access, where you expect problems; targeted
  - Tenants' own appliances
  - Spot faults / potential dangers




### Operational Procedures

- I hate detailed, lengthy procedures – but...
  - Gas is too high risk to not be well documented
  - Lots are very brief, focused on access only, lack SMART targets / objectives
  - Often found in the contract docs
    - *i.e. only time they get looked at is when the service is re-procured*
    - *Focused on what the contractor is responsible for – with no equivalent focus on the client responsibilities*
- Process Map
- Supporting guidance / instruction text
- Clear timescales, roles and responsibilities

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Performance in Compliance


- Quite common to report %age with valid LGSR at end of financial year
  - This is not the same as legal compliance
    - *%age where the subsequent LGSC was conducted within a period of less than 12 months from the previous. (Accounting for Voids)*
- Benchmarking, showed:
  - Confusion over the PI's, what they mean etc
  - Lower level of legal compliance than financial year end
  - Some clients couldn't produce / measure legal compliance
  - IT difficulties of dealing with voids in the PI
  - Significant variation in the approach to monitoring

Tools for Compliance


Action Type	%age of participants who say that they use	Average actual %age use
Injunction	73.68 %	0.35 %
Possession	57.89 %	0.08 %
Environmental Protection Act	31.35 %	0.51 %



## Satisfaction with Performance





- Generally high levels of satisfaction
  - 95%
  - STATUS results for repairs generally – 83%
- Some participants don't/didn't measure; servicing specifically
- Best practice to provide a number of assessment methods
  - Contractor on site, postal, phone, e-mail, STATUS, QA
  - Many don't do this; rely on contractor driven assessment

## Repairs Performance



Repair type	Proportion	%age done on time
Emergency	38.71	97.79
Urgent	32.38	95.75
Routine	28.91	96.04

<h2 style="margin: 0;">Cost Performance</h2> 			
Provision arrangements	Service	Repairs	Total
Internal contractor	£ 64	£ 65	£ 129
Non 3-star, external	£ 59	£ 178	£ 237
External 3-star	£ 45	£ 64	£ 110

- | <h2 style="margin: 0;">How to get involved...</h2>    |
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| <ul style="list-style-type: none"> <li>• <b>Copy of model policy / procedure</b> <ul style="list-style-type: none"> <li>– Freely available; please critique it and comment                             <ul style="list-style-type: none"> <li>• <i>We will revise and issue further up to date versions</i></li> </ul> </li> </ul> </li> <li>• <b>Copy of summary benchmarking reports</b> <ul style="list-style-type: none"> <li>– Freely available</li> </ul> </li> <li>• <b>Model Risk Assessment</b> <ul style="list-style-type: none"> <li>– We will develop collaboratively and share widely                             <ul style="list-style-type: none"> <li>• <i>Please get involved !</i></li> </ul> </li> </ul> </li> <li>• <b>2011 Benchmarking</b> <ul style="list-style-type: none"> <li>– Data collection forms issued in April; results in Sept.</li> </ul> </li> </ul> |

