

Gas Safety Policy & Procedures

Pinnacle Group



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1. Purpose

This policy explains how Pinnacle Group keeps all gas systems and appliances under its control safe. This includes making sure they are installed, used, serviced, inspected and maintained correctly. Our aim is to protect tenants, staff, contractors and visitors from carbon monoxide (CO) poisoning, fire and explosion. We follow the **Gas Safety (Installation and Use) Regulations 1998 (as amended)** and all other relevant health and safety laws and guidance.

Context: Carbon monoxide poisoning can be caused by gas appliances that have been installed incorrectly or not properly maintained. Carbon monoxide cannot be seen or smelt and can be fatal within hours. Pinnacle Group will not accept avoidable gas safety risks and is committed to keeping **100% of its properties compliant**.

2. Scope

This policy applies to all Pinnacle contracts and properties with **gas installations**. This includes:

- General needs homes
- Sheltered and supported homes
- Homes managed through an agency service
- Market-rent and intermediate-rent homes
- Homes provided through mortgage rescue schemes
- Community facilities
- Empty homes and newly built properties
- Homes involved in a mutual exchange

A gas safety check must be carried out every year in any property with gas pipework or gas appliances owned by the landlord.

3. Policy Statement

Pinnacle understands and accepts its legal responsibilities under:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Gas Safety (Installation and Use) Regulations 1998 (as amended)
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Corporate Manslaughter and Corporate Homicide Act 2007

To meet these responsibilities, we will:

- Make sure all **gas appliances, pipework, flues and meters** provided by the landlord are installed safely and kept in a safe condition.

- Carry out a **landlord gas safety check every year** and give tenants a **Landlord Gas Safety Record (LGSR)** as required.
- Give new tenants a **valid LGSR** before they move in. This includes **empty homes, new-build properties** and **mutual exchanges**.
- Manage contractors properly and check the quality and performance of their work.
- Make **reasonable adjustments** for customers with disabilities or other specific needs. We will do this in line with the **Equality Act 2010** and Pinnacle's **Vulnerability** and **Aids & Adaptations** policies.
- Not accept threats, abuse or aggression towards our staff or contractors.

4. Legal and Regulatory Framework

Main laws:

- Gas Safety (Installation and Use) Regulations 1998 (GSIUR), particularly Regulation 36 – Duties of Landlords and Regulation 36A – MOT-style servicing
- Health and Safety at Work etc. Act 1974
- Corporate Manslaughter and Corporate Homicide Act 2007
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

Approved guidance:

- **L56** – Safety in the installation and use of gas systems and appliances (5th Ed., 2018)

Health and Safety Executive (HSE) guidance:

- **INDG285** – A Guide to Landlords' Duties: Gas Safety (Installation and Use) Regulations 1998 (as amended)

Regulatory requirements:

- **Regulator of Social Housing** – the Safety and Quality Standard and other relevant consumer standards

If we do not meet these requirements, the consequences may include prosecution by the HSE, regulatory action or judgement, civil claims and criminal liability.

5. Definitions and Abbreviations

- **LGSR:** Landlord Gas Safety Record (certificate)
- **GSIUR:** Gas Safety (Installation and Use) Regulations
- **GIUSP:** Gas Industry Unsafe Situations Procedure
- **SLA:** Service Level Agreement
- **Gas Safe Register:** The official registration body for gas engineers in the UK (formerly CORGI)

6. Roles and Responsibilities

- **Board:** Approves this policy and receives performance reports every six months.
- **Directors:** Make sure the policy is put into practice and that enough resources are available.
- **Head(s) of Asset Management:** Responsible for day-to-day delivery, managing risks, monitoring KPIs and checking contractor performance.
- **Contract Managers:** Make sure contracts meet all operational requirements and work with Tenancy and Property Managers when access to a property is needed.
- **Compliance Manager:** Prepares reports for the Board every six months and oversees audits, assurance checks and ongoing improvements.
- **Property/Tenancy Managers:** Help arrange access, hand-deliver legal notices and injunctions, and attend court when required.
- **Gas Safe registered contractors:** Carry out servicing and repairs safely and legally, issue the required certificates, keep supporting records and evidence, and report unsafe situations in line with GIUSP.
- **All staff:** Help arrange access, safeguard customers, make reasonable adjustments and follow the zero-tolerance standards.

7. Contractor Appointment, Competency and Supervision

Appointing contractors

- Appoint enough **Gas Safe registered** contractors to provide cover and meet required response times. These times are set out in the **Reactive Repairs Policy** and **Right-to-Repair Scheme** guidance.
- Before appointing a contractor, check their technical ability, health and safety arrangements, training, insurance and references.

Competence

- Engineers must hold current and relevant **ACS** qualifications:
 - **CCN1** (core), **CEN1** (wet central heating), **HTR1** (gas fires) and **WAT1** (water heaters). **CKR1** (cookers) is desirable.
- Contractors must provide an up-to-date list of their engineers, managers and supervisors, together with evidence of ACS qualifications and copies of both sides of each **Gas Safe ID card**.

Supervision and quality checks

- Pinnacle will check the quality of **10% of completed work**. This is in addition to the contractor checking **10%** of its own work.
- We will increase the number of checks if there are concerns about performance.
- We will hold monthly meetings to review performance and quality. Any concerns or allegations about unsafe working practices will be **investigated without delay**.
- Contractors must carry out risk assessments, provide method statements and follow relevant **British Standards**, health and safety law and **Gas Safe** procedures.

8. Equality, Diversity and Reasonable Adjustments

- We will not make assumptions about what customers need. We will discuss and agree any **reasonable adjustments** with each customer. When deciding what is reasonable, we will consider how well the adjustment will work, whether it is practical, any disruption it may cause, the cost and resources needed, and any other support available.
- Adjustments may include changing how we communicate, arranging appointments at suitable times, adapting our policies or procedures, or making physical changes to a property.
- We will follow the **Equality Act 2010** and provide information in accessible formats in line with the **Communicating in Accessible Formats Policy**.
- All staff must complete diversity and inclusion training.

9. Implementation & Operational Controls

Annual gas safety checks and certificates

- We will check all landlord-owned gas appliances, flues and related pipework for safety every year.
- **Landlord Gas Safety Records (LGSRs)** must be completed correctly, checked, given to tenants and kept for at least two years. They must also be available to tenants or the **Health and Safety Executive (HSE)** on request.
- **MOT-style servicing (Regulation 36A)**: If a safety check is completed within the two months before the current certificate expires, the next due date may stay aligned with the existing expiry anniversary.
- Any issues, defects, missing information or non-compliance identified through an independent review of a gas certificate must be recorded in the central Gas Safety Action Log. Actions must be managed within the processes and timescales set out in this document.

Arranging access: appointment timetable (60 to 0 days)

Contractors must offer two contractual appointments and use a range of ways to contact the tenant:

1. First letter and appointment (Day 60–48)

- Send the first letter and raise the work order on Day 60.
- Try to contact the tenant by phone, email and text.

2. Second pre-arranged appointment (Day 48–30)

- If there has been no contact, send a second letter.
- Arrange an appointment for a date within 10 working days of the letter.
- If the tenant will not agree to an appointment before Day 30, tell the Property Manager.

3. Final letter and appointment (Day 30–10)

- Send a final letter with a pre-arranged final appointment.
- Confirm the appointment with the tenant and send a reminder text 24 hours before it.
- If access is provided, complete the service.

If there is no access at an appointment

- The engineer must leave a **No Access Card**, which may include a new appointment date and time, and take a **date-stamped photograph** as evidence.
- The contractor must keep all cards, photographs, call logs, text messages and correspondence.
- The appointment must be confirmed again in line with this policy.

During the service

- Service all **landlord-owned gas appliances and flues** in line with **GSIUR**, the manufacturer's instructions and the SLA.
- Where possible, repair any faults that cause a gas safety check to fail during the same visit. If this is not possible, arrange a follow-on appointment within **five working days** to fix the faults and issue a passed LGSR. Track all remedial work until it is complete.

Unsafe situations (GIUSP)

- If an installation is classed as **Immediately Dangerous (ID)** or **At Risk (AR)**:
 - Decommission or isolate it in line with GIUSP and attach a **Warning Notice**.
 - If the tenant refuses permission and the situation is **Immediately Dangerous**, contact the **Gas Emergency Service on 0800 111 999**.
 - Add the emergency service reference number to the warning notice and report the case through the internal escalation process.

Escalation and legal action to gain access

- **Property Management Team:** May visit the home and explain what the customer must do to provide access.
- **Injunction lasting for the tenancy** (subject to the client's requirements):
 - Ask the appointed solicitor to act and provide a witness statement bundle, all correspondence from the contractor and Pinnacle, the tenancy agreement and terms and conditions, the previous LGSR, and all call and text records.
 - The **Property Manager**, or their line manager, must hand-deliver the court papers and attend court.
 - After the hearing, the solicitor must tell the **Compliance Administrators** the outcome and whether costs can be recovered.
 - Hand-deliver the injunction within **two working days** and include details of a new appointment.
 - If access is still refused, enforce the injunction or ask the solicitor whether to seek possession using a **Notice of Seeking Possession (NOSP)**.
 - After the service is completed, **Asset Management** must start cost recovery with the **Tenancy Accounts Team** and then close the case.
- See the Access Policy and No Access Procedure for full details.

Empty homes (voids)

- Within **48 hours** of confirmation that the previous tenant has left, the **voids contractor** must cap the gas and issue a gas capping certificate.
- At sign-up, the **Voids Team** must arrange for the gas contractor to turn on and test the supply.
- The contractor must uncap the supply, complete the safety check, issue the LGSR and show the tenant how to use the system.
- The property must not be let and keys must not be handed over until there is a valid LGSR.
- A copy of the LGSR must be sent to **Asset Management** within **48 hours** of issue.
- The certificate must be completed within **28 days** of the tenant moving in.

Mutual exchanges

- A new LGSR must be given to the incoming tenant before sign-up and before they move in.
- Arrange the appointment for the date of assignment, or surrender and re-grant, which is usually a Monday.
- The contractor must give the LGSR to the incoming tenant and send a copy to the **Property Services Compliance Team**.
- The certificate must be completed within **28 days** of the tenant moving in.

New-build properties

- A new-build property must not be let without a valid gas certificate.
- **Asset Management** must confirm that the certificate has been given to the tenant before sign-up and before they move in.
- The certificate must be completed within **28 days** of the tenant moving in.

10. Records, Data Validation and Retention

- **Checking and storing LGSRs:** We will review and check every LGSR, then save it in **SharePoint** or another agreed secure system.
- **Keeping certificates:** We will keep certificates for at least **two years**.
- **Updating records:** We will update our systems within **two to three business days** of receiving the information.
- **Checking data:** We will regularly compare/reconcile records to identify and correct any differences or errors.
- **Evidence for legal action where access is refused:** We will keep all cards, photographs, logs and correspondence.

11. Gas Capping, Forced Entries and Client-Specific Adaptations

A client may sometimes ask us to cap a gas supply or force entry to a property to keep people and property safe or to meet legal duties. These actions are not part of Pinnacle's standard Gas Safety Policy, so they must be covered by a separate amendment agreed with the client.

A client may ask us to cap the gas if a property is unsafe or abandoned, presents an immediate risk, or cannot be accessed after all reasonable attempts. We may force entry only after receiving the client's formal written approval or a legal injunction, and after completing a full risk assessment.

The supporting procedure must explain:

- What approval and instructions the client must provide
- What evidence and records must be kept
- What risk assessments and safety checks must be completed
- How we will protect the tenant's welfare and keep them informed
- What the contractor must do during and after entry
- What must happen after entry, including securing the property and completing any required LGSR work

Pinnacle will make sure these actions are carried out safely, legally and openly, in line with regulatory requirements and the client's instructions.

12. Management of Gas Safe Servicing Dates

Pinnacle will keep a complete and accurate record of all **Gas Safe servicing dates**, including past dates and future renewal dates. This will help us meet Regulation 36 of the Gas Safety (Installation and Use) Regulations 1998.

We will meet the following requirements:

1. How long we keep records

- We will keep all Gas Safe servicing dates and records for at least **two years**, as required by law.
- Where our systems allow, we will keep **all previous LGSR dates permanently** to support audits, investigations, legal action and checks between records.

2. What we record

- We will record the **service date, expiry date, contractor and engineer's Gas Safe registration number** in the central compliance system, such as NED, SharePoint or the approved asset management system.
- We will update the system within **two to three business days** of receiving the LGSR.

3. Checking dates

- When we review an LGSR, we will check that:
 - the anniversary date is correct

- **MOT-style servicing** has been used correctly under Regulation 36A, where applicable
- there are no gaps in compliance
- the LGSR issue date matches the service date recorded in the system.

4. Planning future services

- Future servicing dates must be shown on reporting dashboards and used to prepare:
 - monthly forward-planning lists
 - the 60-day, 48-day and 30-day access cycle
 - instructions for contractor scheduling.
- Properties that are within **28 to 30 days of expiry** will be automatically flagged as **priority access** cases.

5. Audits and checks between records

- Every month, we will compare our records with contractor submissions to:
 - check that all Gas Safe dates match
 - identify any missing or incorrect dates
 - confirm that MOT-style servicing windows have been used correctly
 - identify differences between past and current records.
- We will record findings in the compliance action tracker and assign actions to correct any issues.
- We will report the results monthly and quarterly through shareholder and Board KPI reports. All checks will follow the Reconciliation Process.

6. Keeping records secure and accessible

- We will store Gas Safe servicing dates securely in line with Pinnacle Group's Data Protection Policy.
- Only authorised staff in Asset Management, Housing or Property teams and Compliance will have access. Approved contractors may also have access where appropriate.

13. Monitoring, KPIs and Reporting

- Monthly KPI reports to Asset Management will cover:
 - how the servicing programme is performing
 - the percentage of properties with a valid gas safety certificate
 - any properties where the gas safety check is overdue
 - planned work for the coming months.
- **Board reporting:** The Compliance Manager will report to the Board every six months. The report will compare performance against targets and explain any differences and the action being taken.

- **Quality checks:** Pinnacle will check **10% of completed work**, in addition to the contractor checking **10%** of its own work. We will increase the number of checks if there are concerns.
- **Audit and assurance:** We will carry out internal audits from time to time. External audits will also be completed when required by clients or regulators.

Key targets

- **100% of properties** must have a valid LGSR before the current certificate expires.
- LGSR details must be uploaded within **two to three business days**.
- Staff and contractors must follow the required procedures and timescales consistently.

14. Training, Awareness and Communication

- Gas safety procedures will be written down and available on the Intranet.
- Gas safety specialists will regularly provide briefings and refresher training for relevant staff.
- We will use the Tenant Handbook, web pages, letters, text messages and other suitable ways to remind tenants about:
 - allowing access for gas safety work
 - the importance of adequate ventilation
 - the risks and symptoms of carbon monoxide poisoning
 - how to test alarms and report any problems.

15. Replacement of Appliances and Systems

Replacement programmes will prioritise:

- **Risk level** (type/age/location; presence of **asbestos**; open-flued appliances; other hazards)
- **Major works scheduling**
- **Resident vulnerability** and safeguarding considerations

Appliances/systems deemed beyond economic repair or unsafe will be **replaced as soon as practicable**.

16. Customer Care and Zero Tolerance

- We will treat all customers with **courtesy and respect** and respond to requests for information within the stated timescales.
- We will not accept threats, abuse, aggression, discriminatory behaviour or violence towards our staff or contractors. To protect them, we may:
 - report incidents to the police
 - limit the ways a person can contact us

- ban a person from our premises
- temporarily change how services are provided.

17. Risk Management

- **Head(s) of Asset Management** are responsible for managing day-to-day risks and the actions needed to reduce them.
- The main risks are:
 - **GP2:** We do not meet regulatory standards for asset compliance.
 - **GP5:** Repairs, maintenance or environmental services do not meet legal or regulatory requirements.

Controls include robust procedures, competent contractors, adequate resourcing, KPIs, audit, and escalation.

18. Review and Consultation

We will review this policy **every year**, or sooner if the law changes.

As part of the review, we will consult:

- customers
- frontline staff
- gas safety experts
- local authority partners.

19. Document Control and Distribution

- We will keep this policy in the **Pinnacle Group central policy repository**. Relevant staff, contractors and stakeholders will be able to access it.
- We will review this policy and its supporting procedures at least **every 12 months**. We will review them sooner if the law or the way we work changes. We will consult staff, customers, local authority partners and independent gas safety experts as part of the review.

Note: This document explains our policy and procedures. It does not replace legal advice for individual cases.

Appendix A – Legislation and Guidance (Non- exhaustive)

- Gas Safety (Installation and Use) Regulations 1998 (as amended)
- Health and Safety at Work etc. Act 1974
- Corporate Manslaughter and Corporate Homicide Act 2007
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- ACoP L56 (5th Ed., 2018)
- HSE INDG285 (3rd Ed., 2018)
- Regulator of Social Housing – Safety and Quality Standard; consumer standards
- Relevant **British Standards** and **Gas Safe** procedures including **GIUSP**.

Appendix B – Access Process Timeline (At-a-glance)

- **Day 60:** First letter; works raised; multi-channel contact (phone/email/text)
- **Day 48–30:** Second letter; **pre-arranged** appointment within **10 working days**.
- **Day 30–10:** Final letter; **final pre-arranged** appointment; **24-hour reminder**.
- **No access:** No Access Card + date-stamped photo; retain all evidence; re-confirm appointment.
- **Escalation:** Home visit → Injunction → (if needed) possession based on NOSP

Appendix C – Competency (Illustrative)

- **Core:** CCN1
- **Appliance/Systems:** CEN1 (CH), HTR1 (fires), WAT1 (WH), CKR1 (cookers – desirable)
- **Evidence required:** Current ACS, Gas Safe ID (front and back), training records.
- **Supervision/QA:** 10% Pinnacle QCs + 10% contractor QCs (increase if concerns)