

Governance, Risk and Best Value Committee

10.00am, Tuesday, 23 August 2022

Gas Service Improvement Plan Closure Report

Executive/routine Wards Council Commitments	Executive All
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1. Recommendations

- 1.1 It is recommended that the Governance, Risk and Best Value Committee:
 - 1.1.1 Notes the progress made with the Gas Service Improvement Plan (GSIP);
and
 - 1.1.2 Agrees to accept the closure report.

Paul Lawrence

Executive Director of Place

Sarah Burns, Head of Housing Operations

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Gas Service Improvement Plan Closure Report

2. Executive Summary

- 2.1 This report provides an update on the work completed as part of the Gas Service Improvement Plan (GSIP).
- 2.2 The improvement plan sought to strengthen the service's approach in safeguarding the health and well-being of tenants, colleagues and citizens and protect them from harm by reducing the risk of gas related accidents. The plan aimed to improve the quality of record keeping, gas safety guidance and processes, training and qualifications, work allocation, supervision and quality control, technical support, gas compliance procedures and working with contractors
- 2.3 The plan set out a programme of skills development, training and support for gas team leaders and engineers, with an increased focus on professional development. On-site training, coaching and support to gas team leaders and engineers has now been delivered following delays due to the Covid-19 pandemic. Alternative approaches to providing training, coaching and support, including the use of empty homes and technology, were adopted to facilitate this to be delivered safely.
- 2.4 Committee is asked to note the improvements made and to agree the closure report.

3. Background

- 3.1 The Council has legal duties to ensure the safe installation, maintenance and use of gas systems within tenants' homes. Maintenance is carried out by Gas Safe licenced in-house Council team and external accredited contractors. All gas businesses must be registered with Gas Safe Register (GSR), the approved gas registration body of gas business and engineers in the UK. GSR monitor that gas work is being undertaken competently and safely.
- 3.2 The GSIP forms part of the overarching Housing Service Improvement Plan (HSIP) and was first presented at Governance, Risk and Best Value Committee on [23 March 2021](#) and referred to Housing, Homelessness and Fair Work Committee on 3 June 2021.

- 3.3 This report provides confirmation that all actions within the GSIP have now been completed. A final copy of the GSIP is attached as Appendix 1.

4. Main report

- 4.1 The action plan is set out under five broad headings.

- 4.1.1 **Compliance** - Following on from all previous gas safety inspections detailed in Appendix 2 – Gas Audit and Inspection Timeline, CORGI carried out the first part of a 2 stage best practice assessment on 5 and 6 April 2022 as part of the GSIP. A second stage best practice-assessment took place on 9 August 2022. All gas safety guidance and process documents which the inspections had dependencies on, have now been reviewed internally and externally, updated and approved by CORGI. These have been shared with all Gas Team members.

A monthly meeting is held with the Gas Team and CORGI to discuss audit findings, so that any issues can be logged and resolved. Gas team leaders have access to the CORGI client portal to record these actions.

- 4.1.2 **Skills, training and coaching** - Monthly Toolbox Talks with Gas team leaders and operatives are now embedded and evidenced by copies of the content along with any relevant safety or technical bulletins shared with engineers at these sessions.

CORGI carried out site observations of team leaders in June and July 2021 and provided a report on their collective skills, knowledge, and experience. The report concluded that gaps identified could be bridged by engaging a full-time gas manager or quality control inspector with proven experience in these areas. A gas manager with the relevant skills, experience and qualifications has been appointed to fulfil the audit role and is mentoring the gas team leaders so they can provide support and guidance to their engineers.

The site inspections of all gas work completed by Housing Service engineers and those of appointed contractors by CORGI are now embedded as part of business as usual.

Feedback from audits continue to inform future training and coaching needs as well as providing additional customer care feedback.

All available Gas Team members have completed CORGI VRQ L2 Gas Safety in Social Housing and Acting on Unsafe Situations.

The gas manager is supporting gas team leaders in the completion of VRQ L4 Gas Safety in Social Housing qualification and ensure they have protected learning time during work hours to prepare and submit modules for assessment.

4.1.3 **Leadership, Culture and Performance** - Fortnightly service improvement and performance meeting with gas team leaders, manager and operations managers are now embedded and evidenced.

These meetings will continue as business as usual, to support continued compliance, enhanced training and development, which will in turn lead to increased productivity and customer satisfaction.

Performance and compliance reporting is reviewed by the gas manager, team leaders and CORGI monthly. This includes a discussion around issues identified within the audit reports for the previous month for both in-house and appointed contractors' engineers. Issues and opportunities for improvement are then discussed with engineers and contractors as part of monthly Contract Management meetings.

All guidance and processes were reviewed and updated following final feedback from CORGI in March 2022 and signed off as a robust set of documents which should be reviewed and updated at least every two years to include industry, legislative and process changes.

Annual in-house team planning with service managers and CORGI is planned for November 2022 to ensure continuous improvement, review and update of all guidance documentation and team training and development.

4.1.4 **Health and Safety / Life and Limb** – A Health and Safety manager has been in post since October 2021, providing dedicated support for teams within the Housing Service. All gas training requirements and safe working practices have been reviewed and updated.

4.1.5 **Service Improvement Plan** – The actions set out in this section are aimed at ensuring that best practice remains fully embedded and that there is ongoing monitoring in place. Quarterly reviews, as set out in the GSIP, took place in February and May 2022 and will continue on a quarterly basis.

The final action in this section under 5.3 of the GSIP was to 'Agree timescale and assessment plan for Full CORGI Quality Accreditation'. The objective of this action was to ensure that all gas works within the Housing Service comply with best practice. However, CORGI has not developed the accreditation product therefore it has not been possible for officers to progress this action.

As GSR are the official registration body for the gas industry, arrangements have been made for GSR to carry out an additional audit within the Housing Service. This will give the equivalent level of assurance that all gas works comply with best practice.

Officers have agreed this route with GSR as an alternative to the CORGI accreditation and this action has been closed.

5. Next Steps

- 5.1 The processes, procedures, training and development that have been reviewed and implemented as part of the GSIP will be subject to ongoing review and improvement.
- 5.2 Officers will liaise with GSR to confirm a date for their on site inspection and ensure future inspections take place at a regularity agreed as best practice with GSR.

6. Financial impact

- 6.1 There is no additional financial cost implication for the Committee to consider.

7. Stakeholder/Community Impact

- 7.1 The GSIP has provided assurance that the Housing Service and its appointed contractors are carrying out gas repairs, maintenance and capital works in accordance with its duties as a social landlord and employer of gas engineers. This protects our tenants, staff and citizens from the risk of gas related incidents or accidents occurring.

8. Background reading/external references

- 8.1 Gas Service Improvement Plan: Housing, Homelessness and Fair Work Committee [3 June 2021](#).
- 8.2 Gas Service Improvement Plan update: Governance, Risk and Best Value Committee Business Bulletin [18 January 2022](#).

9. Appendices

- 9.1 Appendix 1 - Completed Gas Service Improvement Plan.
- 9.2 Appendix 2 – Gas Audit and Inspection Timeline.

APPENDIX 1

CITY OF EDINBURGH COUNCIL HOUSING PROPERTY SERVICE - GAS SERVICE IMPROVEMENT PLAN 2021

SENIOR RESPONSIBLE OFFICER: WILLIE GILHOOLY
LEAD OFFICER: CAROL REID
OPERATIONS MANAGER FOR GAS: WILLIE CRAWFORD TO 31/01/22. WILLIE GILHOOLY FROM 01/02/22

This plan will be reviewed quarterly and amended as required

FEBRUARY 2021

INTRODUCTION

This document sets out the gas service improvement plan for 2021.

The plan takes account of the findings of various audits, inspections and reviews over the last four years. While some progress has been made, the overall approach to service improvement has been fragmented and has not been as effective as it could have been.

These issues have been addressed in the development of this plan, which includes areas for improvement in record keeping, training and the management of processes and procedures.

The plan places an emphasis on enhancing a working culture that:

- promotes ownership and responsibility;
- deepens understanding of risk and how it is managed;
- actively seeks improvement and challenge;
- builds supportive teams;
- enhances skills through training and professional development; and
- embraces new technology to support service delivery and customer care.

BACKGROUND

The Council has legal duties to ensure the safe installation, maintenance and use of gas systems within tenants' homes. As an employer of gas engineers and as a landlord the Housing Property service is responsible for maintaining gas fittings and flues in a safe condition and carrying out safety checks for appliances and flues. Maintenance is carried out by an accredited in-house Council team and external accredited contractors.

All gas businesses must be registered with Gas Safe, the approved gas registration body of gas business and engineers in the UK. Gas Safe have a team of inspectors who monitor that gas work is being undertaken competently and safely.

Over the last four years these services have been subject to a series of external audits and inspections, including one by Capita in 2016 and two by Gas Safe Register in 2017 and 2019.

In 2017, the Gas Safe Register inspection identified 21 areas for improvement, 19 areas that were satisfactory and 3 areas of non-compliance out of a total of 43 categories. The areas of non-compliance were corrected immediately and refresher training for team leaders and engineers was undertaken jointly with Gas Safe following the inspection.

In 2019, Gas Safe Register carried out a further inspection against 51 categories. The inspection identified 10 categories for improvement, 41 categories that were satisfactory and no non-conformities. Six of the ten categories for improvement were also identified in 2017.

Prior to the inspections by Gas Safe Register, the service commissioned a Fitness Check from Capita in August 2016. Capita found that, while the gas team had a good overall understanding of the requirements for managing gas safety, there were areas of concern. These were that some operational documents and work practices which were out of date and in need of re-evaluation and update and records did not accurately reflect the competence, experience and training of gas engineers. Some of these concerns were reflected in the areas for improvement identified in the 2017 Gas Safe audit.

In 2020, a further review of the management of gas safety was undertaken. This concluded that, at times, the service had been slow to action recommendations and that the same areas for improvement had been identified in successive reviews. The review welcomed the commission of CORGI to provide additional oversight, gas auditing services and technical support.

IMPROVEMENT PLAN

The plan sets out a programme of skills development, training and support for gas team leaders and has an increased focus on professional development. Plans to provide additional on-site training, coaching and support to gas team leaders and engineers have been delayed for much of 2020 following the adoption of safe working practices and regulations to control the spread of infection (Covid-19). However alternative approaches to providing training, coaching and support, including the use of empty homes and technology have been set out in this improvement plan.

IMPROVEMENT PLAN STRATEGY

The improvement plan seeks to strengthen the service's approach to protecting the safety and well-being of our tenants, protecting them from the risk of harm and reducing the risk of gas related accidents.

The plan aims to address weaknesses in record keeping, processes and training.

The improvement plan also includes preparation to join the CORGI Quality Accreditation Scheme for landlords and contractors towards the end of 2021/early 2022. Accreditation covers ethos and policies, work scope, training and qualifications, work allocation, supervision and quality control, procedures, work documentation, technical support, gas compliance procedures and working with contractors.

IMPLEMENTATION

The plan will be reviewed with CORGI Technical Services and updated to reflect the development of the plan through specific stages, with key milestones to be achieved at each stage. Planned actions will be aligned to these milestones at regular review points.

The Housing Property Gas Service Board will have oversight of the service improvement plan and operational performance. It will be chaired by the Senior Responsible Officer and will include Operations Managers (from within the Housing Property Service) representation from CORGI and Gas Service Team Leaders and will meet monthly.

GAS SERVICE IMPROVEMENT PLAN - ACTION PLAN

1. Compliance

	Action	Completion Date	Status	Owner WC to 01/01/22 then WG
1.1	Review annual inspections COVID risk plan and identify further measures to maximise compliance with annual inspection requirement. (TEAM: Consult with CORGI)	February 2021	Complete	WC / WG /CR
1.2	Internal compliance review of policy and procedures. Review against Gas Safe inspection categories and improvement actions from 2019 inspection and changes to operational processes. (TEAM)	14 th June 2021	Complete	CR/ WC / WG
1.3	External (CORGI) compliance review of policy and procedures. Review against Gas Safe compliance checklist and improvement actions from 2019 inspections. To include Housing Property's Current Gas Procedure (version 5) (CORGI)	March 2021	Complete	CR/ WC / WG
1.4	Implement monthly briefing and contract review meeting with new framework contractors. (TEAM with CORGI)	April 2021	Complete	WC / WG
1.5	Review team leader essential task and responsibilities check list. (TEAM with CORGI)	June 2021	Complete	CR/ WC / WG
1.6	Review checklist compliance and audit team to meet risk and statutory requirements. (TEAM with CORGI)	April 2021	Complete	CR/ WC / WG
1.7	CORGI to undertake Best Practice Assessment Stage One – improvements and non-compliances to be addressed. (CORGI lead with TEAM)	8 th and 9 th April 2022	Complete	CR/ WC / WG
1.8	CORGI to undertake Best Practice Assessment Stage Two – improvements and non-CORGI to be tested. (CORGI lead with TEAM)	9 th August 2022	Complete	CR/ WC / WG
1.9	Gas Contractor Review – carry out review of a) contractor policy and process and b) performance. (TEAM/CORGI)	September 2021	Complete	WC / WG / MB
1.10	Monthly Audit and Compliance Review with CORGI – Report on Risks and Issues. To involve Senior Manager/Operations Manager and, Team Leaders. (TEAM with CORGI)	Ongoing	Complete	CR / WC / WG

2. Skills, Training and Coaching

	Action	Completion Date	Status	Owner
2.1	Policy and Process Refresh Day Training – Gas Team Leaders, Operations Managers as appropriate (CORGI). Update – series of workshops over 8 sessions started	April 2021 October 2021	Complete	CR/ WC / WG
2.2	On Site Coaching Day training - Gas Team Leaders, Operations Managers as appropriate (CORGI). Use empty homes while physical distancing applies.	June 2021	Complete	CR/ WC / WG
2.3	Policy and Process Refresh Day Training – Gas Engineers/Operatives Refresh (CORGI with team leaders)	November 2021	Complete	CR/ WC / WG
2.4	On site refresh and coaching of gas engineers and operatives. (Initial round with CORGI + gas team leader.) Use empty homes while physical distancing applies.	May/June 2021 repeat annually.	Complete	CR/ WC / WG
2.5	Establish coaching programme including monthly on-site half days with team leaders/gas engineers. (CORGI to attend quarterly).	July 2021 onwards	Complete	CR/ WC / WG
2.6	Policy and Process Refresh (Gas Team Leaders Quarterly Briefing with CORGI and Operational Managers)	June onwards 2021	Complete	CR/ WC / WG
2.7	Gas team leaders to re-establish monthly toolbox talks/team meetings with engineers with set briefing on policy and practice updates. (CORGI to provide brief and attend as requested/appropriate). Review of improvement plan. Training/coaching as required.	March 2022 – not completed until May 2022	Complete	WC / WG
2.8	Team Leaders and Engineers to attend training session on updated <u>Gas Safety (Installation and Use) Regulations 1998 (GSIUR)</u> . (CORGI)	May / June 2021	Complete	CR/ WC / WG
2.9	Update template for recording coaching on site observations. To be adapted for TOTAL MOBILE. (CORGI with TEAM)	March 2021	Complete	CR
2.10	CORGI level 4 certificate in Gas Safety Management in Social Housing – 18-month programme to begin (CORGI)	Start May 2021 – completion Est Nov 2022	Complete	CR / WC / WG
2.11	CORGI level 3 certificate in Gas Auditing Procedures to be completed by Team Gas Audit Inspector* (CORGI) – <i>Gas Manager recruited to fulfil this role.</i>	June 2022	Complete	CR

3. Leadership, Culture and Performance

	Action	Completion Date	Status	Owner
3.1	Fortnightly service improvement and performance meeting with gas team leaders and relevant operations managers. (TEAM)	February 2021 onwards	Complete	WG- Lead
3.2	Annual in-house team planning with service managers and CORGI. Service improvement plan review. (TEAM with CORGI)	November 2021	Complete	WC / WG / CR
3.3	Monthly performance and compliance reporting to be reviewed – CORGI to review and advise. To review policy, processes, training and coaching programme. (Team with CORGI)	May 2022	Complete	CR / WC / WG

4 Health and Safety / Life and Limb

	Action	Completion Date	Status	Owner
4.1	Continue recruitment process for health and safety/life and limb specialist role with HR/CH&S (TEAM)	Oct 2021	Complete	CR
4.2	Procure Risk Management Consultant specialising in housing health and safety/life and limb specialist role with CH&S input. (TEAM)	Dec 2021	Complete for gas	CR

5 Service Improvement Plan

	Action	Completion Date	Status	Owner
5.1	Service Improvement Plan Review Complete (TEAM with CORGI)	Dec 2021	Complete	CR
5.2	Quarterly Review of Service Improvement Plan (TEAM possibly with CORGI)	Feb / May 2022	Complete	CR/WG
5.3	Agree timescale and assessment plan for Full CORGI Accreditation (TEAM with Corgi)		Closed - product not available	CR/WG

Appendix 2

Gas Audit and Inspection Timeline

Inspection report	Review undertaken by	Type of inspection undertaken	Review Assessment Ratings	Has assessment rating improved? Yes / No	Progress of Review
1 August 2016	UK mandatory registration body - Capita	Gas Policy Fitness Check	10 categories summarised as: <ul style="list-style-type: none"> • No evidence of compliance - 0 • Limited evidence of compliance - 4 • Policy available and evidence of compliance - 6 	This was the first inspection carried out therefore, no comparison is available.	Action plan completed.
25 May 2017	UK mandatory registration body - Gas Safe Register	Business Inspection Report	43 Categories summarised as: <ul style="list-style-type: none"> • Non-conformance - 3 • Improvement Required - 21 • Satisfactory - 19 	More detailed assessment carried out by Gas Safe than above No	Action plan completed.
23 May 2019	UK mandatory registration body - Gas Safe Register	Business Inspection Report	51 categories summarised as: <ul style="list-style-type: none"> • Non-conformance - 0 • Improvement Required - 10 • Satisfactory - 41 	Yes	Action plan completed.
8 and 9 April 2021	Gas Consultancy organisation - CORGI Technical Services Ltd	CORGI Best Practice assessment (Stage 1)	31 categories summarised as: <ul style="list-style-type: none"> • Fundamental control weakness - 4 • Significant control weakness - 5 • Observation of opportunities to implement a good or better practice, to improve efficiency or further reduce exposure to risk - 9 • Commendation - 13 	Yes	Action plan completed.

9 August 2022	Gas Consultancy organisation - CORGI Technical Services Ltd	CORGI Best Practice assessment (Stage 2)	<p>31 categories summarised as:</p> <ul style="list-style-type: none"> • Fundamental control weakness - tbc • Significant control weakness - tbc • Observation of opportunities to implement good or better practice, to improve efficiency or further reduce exposure to risk - tbc • Commendation - tbc 	Awaiting outcome	
Autumn 2022	UK mandatory registration body - Gas Safe Register	Business Inspection Report	To be confirmed		