

GAS SAFETY POLICY

1. INTRODUCTION

1.1 Purpose

The responsibility of Keele University, in relation to gas safety, is to ensure all gas equipment installed and used within all University properties are installed and maintained by competent persons and is safe to use and present no harm to any person.

In addition, Keele University owns a private gas distribution network and as a Licensed Gas Transporter / Supplier within Great Britain, needs to demonstrate compliance with the Gas Safety (Management) Regulations 1996 (GS(M)R) in the construction, maintenance and operation of the Keele University Gas Distribution Network.

All gas supplies to the site are delivered under firm gas contracts, hence there are no issues arising from interruptible gas contracts.

1.2 Scope

Keele University is responsible for gas safety related activities in Domestic, Catering and Commercial type Natural Gas Installations with a limited number of LPG Installations on the University estate properties. The Estates & Campus Services Directorate is responsible for ensuring that all properties including some domestic dwellings with gas installations are safe and compliant with respect to the Gas Safety (Installation and Use) Regulations.

The University of Keele owns and maintains a gas distribution network which conveys natural gas from the outlet of 4 meters (i.e. primary meters located at points across the site).

The primary meter is owned by National Gas plc (CADENT) and gas is delivered to them via the CADENT gas distribution system. It is the CADENT's responsibility to maintain adequate meter inlet pressures and gas quality.

Keele University property portfolio is extensive as it covers Medical, Pharmaceutical and Science Schools, Halls of Residence, Faculty Offices, Catering, Sports Hall, and Administrative Amenities. The Gas Safety Management System applies to all sites owned or wholly managed by Keele University.

The following installations are excluded from these procedures.

- Owner occupied staff housing on campus.
- The installation, servicing and maintenance of natural gas and LPG installations to such entities that, via lease or internal agreements, have control of their own operations, such as Science Park tenants.

- Bottled laboratory gasses (installations and storage requirements controlled and maintained by designated building technicians)
- Medical gases and oxygen supplies
- Maintenance of Mobile / temporary bottled gas installations, contracted for events or other situations (this should be included in any contract with approved suppliers)
- Upstream natural gas installations, incoming supplies, equipment, and networks owned by Cadent.

Fixed or portable sources of LPG and any temporary heating / catering / process imported for use on the site shall be covered.

2. POLICY

Keele University [hereinafter referred to as the “University”] has a duty of care to employees, contractors, tenants and visitors to ensure a safe and appropriate working environment.

The University accepts its responsibility under the Health and Safety at Work etc. Act 1974 and the Gas Safety (Management) Regulations 1996 and the Gas Safety (Installation and Use) Regulations 1998.

In doing so, the university aims to take all reasonable precautions in respect to the management of gas networks and equipment to control the risk of harm to employees, contractors, tenants, visitors and other persons working at or using its premises.

The University recognises the importance of a safe workplace with appropriate equipment and facilities as well as high standards of leadership, engagement, communication, training & competence and other management issues.

Keele University has put in place arrangements that will ensure so far as is reasonably practicable, the safety of staff when working on gas appliances and installations, downstream of the Emergency Control Valve. Procedures are also in place to ensure that all contractors employed on gas work comply with safe working practices.

Emergency procedures have been formulated to deal with Gas and Carbon Monoxide escapes.

This Policy is formally accepted by the Vice Chancellor and approved by the appropriate Directors and associated Heads of Department. The Vice Chancellor will do all that is reasonably practicable to comply with its requirements and will make the necessary resources available.

The management of gas safety will be a continual commitment by the University involving regular management and progress meetings, and a commitment to a risk assessment programme.

The overall Gas Safety Management procedures shall be supported with adequate resources and suitably qualified, trained, and competent staff to ensure the successful implementation of this Policy.

3. ROLES AND RESPONSIBILITIES

Organisational Responsibilities

The Council

The Council is ultimately responsible for the health and safety of any person who may be harmed by university activities. As such, it must satisfy itself that the University has an appropriate written Statement of Policy on Health and Safety, along with effective arrangements to implement it.

Statutory Duty Holder: Vice-Chancellor

Take overall responsibility to ensure that the Policy for Gas Safety is implemented, and that appropriate funding is made available, within budget submissions, to carry out any capital and revenue works. The Vice –Chancellor has a duty to appoint a Responsible Person and Deputy in relation to Gas Safety, who in practice carries out the day-to-day implementation of precautionary measures.

Deputy Director of Estates & Campus Services (Operations)

Monitoring of Operational Action Plans & Action Plan Improvements –

- Review operational action plans on a regular basis.
- Review Audit action Plans on a regular basis.
- Report status of compliance to various committees – Leadership team/ health & safety committee.

Responsible Person Gas:

- Produce, develop, implement and manage the Policy and associated procedures.
- Select an Appointed Consultant to assist with the Gas Safety Case and Gas Safety Procedures, including annual auditing.
- Act as the Gas Emergency Controller for the University's Private Gas Network as required by the Gas Safety (Management) regulations 1996.
- Be responsible for liaison with Estates & Campus Services project managers, other departments, and contractors when other building work or activities are being carried out to ensure these do not have any adverse effect on the safe operation of any gas installation, controls or appliances.
- The role shall be appointed in writing by the Vice Chancellor.
- This document and any related gas procedures will be reviewed on an annual basis with the Head of Occupational Health & Safety and with external Gas Consultancy Services.
- Evaluate and appoint competent Gas Emergency response contractors and act as responsible person for the gas network and act as signatory when handovers are requested from Cadent Ltd
- Be responsible for actions in Gas Safety Case Emergency procedures.
- Lead on the agreement of the service level, scope of servicing & certification required for housing stock, required by the Gas Safety (Installation and Use) Regulations 1998 with the Head of Accommodation services.

- Be responsible for ensuring with the Gas Safe Authorised Person- Estates Team Leader, that all direct labour operatives are updated on a regular basis to ensure they are up to date with current legislation, operating procedures.
- Lead on the management of the asset register of properties and inform the Planned Maintenance Coordinator of any changes that affect the planning schedule of appliances' safety checks and servicing requirements.
- Ensuring that sufficient resources are made available to enable the objectives of the procedure to be met.
- Liaise with the Planned Maintenance Coordinator to ensure asset registers are maintained where gas related equipment is recorded for ongoing maintenance requirements.
- Control the access for the planned programme of works and deal with responsive repairs. Respond to any warning notices raised, confirm and close out any remedial actions, check corrective actions raised by contractors because of unsafe situations.
- Ensure that up-to-date drawings are available for all gas systems.
- Ensure that risk assessments are carried out after any change or alteration to Gas systems, and that risk assessments are regularly reviewed.
- Identify and request the necessary funding required implementing the precautionary measures and any improvement or alteration works necessary to comply.
- Assist in a formal audit of the procedures to ensure compliance on a regular basis, at least annually.
- Ensure that any action plans are reviewed & updated monthly.
- Chair the Monthly Gas Compliance Meetings.
- Ensure effective communication for the duty holder Via Deputy Director of Estates & Campus Services on all aspects of Gas Safety.
- Ensure effective communication & management of all staff involved in the gas risk management programme.
- Co-ordinate with Deputy Responsible Person in response to any investigation arising for non-compliant issues and for the ongoing development of the Estate.
- Ensure that all new or refurbished gas systems handed over to Estates & Campus Services are appropriately documented, commissioned, and signed off in accordance with the procedures document. Any issues arising with the installation will be reported to the relevant contractor / project team for resolution.
- Monitor the implementation and efficacy of this Policy and the associated procedures document.
- Liaise with external 3rd parties on matters of assurance including the Health and Safety Executive in relation to the Gas Safety Case on a 3 yearly cycle or after any material changes to the Keele gas network are proposed / carried out.
- Attend updated management training at least every three years, or sooner if determined by training needs analysis.

For natural gas infrastructure the incumbent requires a detailed knowledge of the natural gas network (i.e. the location, materials of construction and the age of the pipe system) and an understanding of specific gas distribution operations, i.e.

Pressure regulation, flow stopping, and mains cut out procedures, pressure testing, network purging and re-commissioning,

Procedures for reporting, locating and repairing gas leaks.

The incumbent is not expected to write routine or non-routine procedures for network operations or perform the role of Authorising Engineer* but must have an understanding of, and access to, the following Institution of Gas Engineers procedures:

IGE/TD/3 Edition 5 – Steel and Polyethylene pipelines for Gas Distribution

IGE/TD/4 - Gas Services

IGE/TD/13 – Pressure Regulating Installations for Transmission and Distribution

IGE/SR/20 – Dealing with Reported Gas Escapes

IGE/SR/10 Edition 2 – Procedures for Dealing with Escapes of Gas in Underground Plant.

*The role of Authorising Engineer is performed by the 'Universities competent authority for the safety case.'

To perform the role of gas Network Controller and accept the Transfer of Responsibilities the individual needs to have a detailed knowledge of the University's natural gas network and be competent to assume responsibility for dealing with gas escapes. He/she will need to be able to assess the risks and decide on the actions required. He/she will be required to liaise with the CADENT's gas emergency service engineer and formally accept responsibility for, and take control of, the emergency. The individual (or individuals) needs the following competencies: -

Be familiar with the procedures for locating and repairing outside gas escapes and reports of Carbon Monoxide (CO) spillage from appliances.

Be capable of selecting and supervising a competent contractor or direct labour operatives to carry out the work.

In order to do this, he/she must also have a working knowledge of the following technical standards:

IGE/SR/20 – Dealing with Reported Gas Escapes

IGE/SR/10 Edition 2 – Procedures for Dealing with Escapes of Gas in Underground Plant.

The RP and deputy RP shall ensure necessary documentation is available to building managers in relation to gas network infrastructure and appliances.

- Up to date as-fitted drawings of all the distribution systems within those premises
- Up to date as-fitted drawings of all the gas supply network including valve cards to assist with emergency shutdown or with supply emergencies.
- Completed risk assessments for above ground gas installations as required by the Dangerous Substances and Explosive Atmosphere Regulations 2002(DSEAR)

Deputy Responsible Person Gas / Network Gas Emergency Controller

The incumbent will:

- Act as a Gas Emergency Controller for the University's Private Gas Network as required by the Gas Safety (Management) regulations 1996.
- Be responsible for liaison with Estates & Campus Services project managers, other departments, and contractors when other building work or activities are being carried out to ensure these do not have any adverse effect on the safe operation of any gas installation, controls or appliances.
- The role shall be appointed in writing by the Vice Chancellor.

- Evaluate and appoint competent Gas Emergency response contractors and act as responsible person for the gas network and act as signatory when handovers are requested from Cadent Ltd.
- Take on the roles of the Gas Responsible Person in his / her absence.

Gas Safe Authorised Person – (Estates Plumbing Team Leader)

Responsible for:

- The day-to-day operations of Direct Labour (DLO) Gas Safe Operatives and the general management of gas related problems within the University's stock for which they have responsibility.
- Where the situation is outside the competence of the Gas Safe Authorised Person, then he/she should inform the Gas emergency controller/ Head of Maintenance Services and procure the services of a competent contractor.
- Manage investigations of gas escapes & coordinate the investigation of reported Carbon Monoxide spillage/alarms. For Gas Escapes, liaise with Cadent or the Gas Emergency Service Provider under such circumstances and inform the Gas Safety Controller if there is any escalation in the situation. Record details of the incident for future reporting, follow up on any remedial actions within the Gas Safe Authorised Persons remit.
- Responsible for ensuring the DLO Gas Safe Operatives have the appropriate training certification for the work allocated to them.
- Ensure adequate induction and training is provided to new members of staff on gas safety related matters as appropriate to their roles and responsibilities.
- Responsible for dissemination of information and updates from Gas Safe to all DLO Gas Safe Operatives and to inform the Operations/ Gas emergency controller of any compliance related issues requiring action.
- Responsible for checking certification and providing certification to planned maintenance coordinators.
- Responsible for checking risk assessments and method statements of approved contractors who are directly employed by the Gas Safety Engineer.
- Responsible for auditing performance of DLO Gas Safe engineers to ensure compliance with this Procedure and Gas Safety (Installations & Regulations) 1998.
- Provide evidence of toolbox talks in relation to dissemination of information relating to gas legislation, technical bulletins and HSE guidance.
- Responsible for ensuring with the Gas Emergency Controller that all DLO operatives are updated on a regular basis to ensure they are up to date with current legislation, operating procedures.
- Provide reports to the gas safety meetings in relation to gas escapes, contractor and DLO performance, dangerous situations and equipment upgrades.

DLO Gas Safe Engineers (competent persons)

Responsibilities include:

- Adherence to this Procedure and requirements of Gas Safety (Installation and Use) Regulations 1998.
- Ensure that they hold appropriate current gas qualifications for the areas of work they are employed to undertake.

- Ensure they will comply with all safe working practices and install, service and maintain in a safe condition all gas equipment in accordance with the requirements of the Gas Safety (Installation and Use) Regulations 1998 and any relevant manufacturers' instruction and current standards in force.
- Ensure they complete gas safety reports or other documentation relevant to the work undertaken and issue any warning notices in accordance with the industry Unsafe Situations Procedure (Gas Safe Technical Bulletin 001).
- Ensure they will respond to a report of fumes or CO detector sensor alarm activation, attend on site and, where safe to do so, make safe. If the incident is RIDDOR, reportable contact site security will inform the Emergency Service Provider, Cadent Ltd, and also to cooperate with any subsequent investigations.

Planned Maintenance Coordinator

Responsible for:

- Planning recurrent works, inspections and servicing of gas appliances, safety checks and monitoring in line with the requirements of the Gas Safety (Installation and Use) Regulations 1998 utilising the Estates and Campus Services, Q5 planning database and assets registers at the request of Estates and Development staff responsible for Gas Safety and from information supplied via project managers and the handover documentation "Project Handover Checklist".
- Creating job tickets for required tasks relating to planned gas works and disseminating these job tickets to the Head of Maintenance Services and Gas Safe Authorised Person in a timely manner.
- Updating the relevant asset management database when works are signed off and rescheduling tasks.
- Providing reports detailing overdue works to be utilised in monthly reports to the Estates & Campus Services Senior Leadership Team.
- The retention and storage of certification relating to Gas Safety Inspections.
- Assist in the formulation and upkeep of asset management systems.
- Collate gas certification and send to external auditors.

Gas Emergency Service Provider (North Staffs Pipe Services Ltd)

Responsible for:

- Providing and updating when necessary, emergency contact details to both Keele University Site Security and Gas emergency controller and the Estates & Campus Services service desk.
- Liaising with Gas emergency controllers during attendance of gas emergencies and provide advice relating to transfer of responsibilities from Cadent or the Gas Emergency Service Provider.

Contractors

Gas Contractors will:

- Ensure all operatives hold appropriate current gas qualifications for the areas of work they are employed to undertake.
- Comply with all safe working practices and install, service and maintain in a safe condition all gas equipment in accordance with the requirements of the Gas Safety (Installation & Use)

Regulations and any relevant manufacturer's instructions and current standards in force. Complete gas safety reports or other documentation relevant to the work undertaken and issue any warning notices in accordance with the Industry Unsafe Situations Procedures IGEM/G/11.

- Respond to a report of fumes or CO detector sensor alarm activation, attend on site and investigate, take appropriate actions and submit reports on findings and remedial actions. Ensure that all operatives are kept up to date with gas legislation, technical bulletins, or HSE guidance and provide evidence of relevant "toolbox talks" and operative ACS competencies upon request.

Contractor performance shall be subject to quarterly review at the Estates and Campus Services Health & Safety Review meetings.

Gas Consultants

A Gas Consultant will be retained by the University to act in an advisory and support capacity to the Estates and Development Department. In this advisory capacity the consultant will:

- Attend Management Review meetings upon request.
- Provide quality assurance of completed documentation,
- Provide staff development in gas safety awareness,
- Provide staff training in dealing with industry unsafe situations, Carbon Monoxide releases, and develop risk assessments for the inspection and testing of pipework.
- Carry out annual audits of the Gas Management System.

Estates & Campus Services Service Desk Staff

Responsible for:

- Following Emergency Procedure Instruction Sheet 1 of the Gas Safety Case Emergency Procedure KU/Gas/6 advising the person reporting any smell of gas or suspected CO incident.
- Raising an appropriate job ticket on the asset management database for internal recording & distributing a copy of the ticket to the Gas emergency controller.
- Compiling information utilising the Gas Reporting Form (GE1) when suspected escapes are reported and to pass on a record of this document to the Gas Responsible Person.

Estates Supervising Officer

Responsible for:

- Ensuring gas designs are authorised by the Keele University Principal Mechanical Engineer.
- Ensure that all contracted staff conducting 'work' either on installation of a gas system or alteration to an existing gas installation have the necessary gas qualifications required for the work by utilising the sub-contractor's declaration form.
- When work is undertaken, provide information regarding the removal of, or addition of new gas assets to the Gas Safe Authorised Person – Plumbing Team Leader.
- Update the Gas emergency controller so that Gas valve cards, risk assessments and load shedding documentation can be updated.

- Update Planned Maintenance Coordinator of works so that planned maintenance regimes can be updated.

Campus Safety Staff

- Campus Safety staff operate on a 24/7 basis and are responsible for implementing the emergency procedure of the Gas safety case. They are to compile information utilising the Gas Reporting Form (GE1) when suspected escapes are reported and to pass on a record of this document to the Gas Responsible Person.

Head of Cleaning & Sport

Responsibilities are:

- To work with the Gas Emergency controller in producing an asset list & in agreeing the service level and scope of servicing and certification for housing stock, required by the Gas Safety (Installation and Use) Regulations 1998.
- Informing the Gas Safe Authorised Person of any changes to Gas equipment within the housing stock.
- To facilitate access arrangements to properties with the Accommodation Services area of control for servicing repairs and upgrades.
- To develop Tenancy Agreements that clearly identifies the responsibilities of tenants with regard to gas safety.
- To ensure procedures are in place to ensure any void properties are surveyed.
- To ensure that agreements are in place for the provision of gas safety certification to contracted laundry services, and to monitor the performance of service providers for compliance.
- Provide adequate safety information and authorisation to users of gas equipment utilising job descriptions, person specifications, training, and risk assessment.

Head of Catering Services

Responsible for:

- Ensuring that the Gas emergency controller has an up-to-date asset list, and that they are informed prior to the purchase and installation of any new gas appliances on the Keele campus to ensure they are installed correctly with the necessary certification.
- Ensuring that any mobile catering equipment is fit for purpose and is correctly certified and procedures are in place to check installations.

Head of Events and Conferences

Responsible for:

- Events shall only utilise Keele University mobile catering equipment, supplied via Catering services.
- If mobile gas fired heating appliances are hired or supplied for any events, they must be risk assessed, correctly certified and procedures should be in place to check installations prior to, and during use.

Chief Executive Officer for Students Union

Responsible for:

- Ensuring that any fixed gas catering equipment, under their control, is maintained and serviced as per manufacturers recommendations and that a gas safety certificate is available and up to date for the installation.
- Ensure maintenance arrangements are in place for ventilation and extract systems.
- Ensuring that the Gas RP has an up-to-date asset list, and that they are informed prior to the purchase and installation of any new gas appliances on the Keele campus to ensure they are installed correctly with the necessary certification.
- Provide to the Gas Safe Authorised Engineer all certification for installation and servicing of gas appliances and installations for audit purposes.
- Ensuring that any mobile catering equipment or mobile gas fired heating appliances, hired or supplied for any events is risk assessed, correctly certified and procedures are in place to check installations prior to, and in, use.

4. RELATED POLICIES AND PROCEDURES

Related policies:

[Control of Contractors policy](#)

Related legislation and guidance:

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Gas Safety (Installation and Use) Regulations 1998
- Gas Safety Management Regulations 1996
- Dangerous Substances and Explosive Atmosphere Regulations 2002
- IGE/TD/3 Edition 5 – Steel and Polyethylene pipelines for Gas Distribution
- IGE/TD/4 - Gas Services
- IGE/TD/13 – Pressure Regulating Installations for Transmission and Distribution
- IGE/SR/20 – Dealing with Reported Gas Escapes
- IGE/SR/10 Edition 2 – Procedures for Dealing with Escapes of Gas in Underground Plant.
- IGE/SR/20 – Dealing with Reported Gas Escapes
- IGE/SR/10 Edition 2 – Procedures for Dealing with Escapes of Gas in Underground Plant.

Related Internal procedures:

- Keele University Gas Safety Case
- Keele Gas Safety Management Procedure

5. REVIEW, APPROVAL & PUBLICATION

This policy is to be reviewed every 3 years by the Responsible Person Gas, with approval from Deputy Director of Estates & Campus Services (Operations) and final sign off from Health and Safety Standing Committee. Consultation during this review will be undertaken with teams in the Estates & Campus Services Directorate and DOSH.

This review will be uploaded to Policy Zone.

6. ANNEXES

None

7. DOCUMENT CONTROL INFORMATION

Document Name	Gas Safety Policy
Owner	Principal Mechanical Engineer
Version Number	1.1
Equality Analysis Form Submission Date	N/A – HR agreement not required as no direct people element
Approval Date	29/06/21
Approved By	Occupational Health and Safety Committee
Date of Commencement	21/03/2024
Date of Last Review	21/03/2024
Date for Next Review	21/03/2027 (3 years from date of approval)
Related University Policy Documents	Control of Contractors policy
<i>For Office Use – Keywords for search function</i>	