

Gas Safety Policy

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1. Our purpose

We're proud to be able to support tens of thousands of people across England by providing affordable housing and care to help people live independently.

Everything starts at home, and we are privileged to be able to do work which makes a real difference to the lives of people in our communities. Everything we do is about people – whether that's providing a good quality, safe home or providing care which helps someone to live an independent life.

We live and breathe this social purpose.

2. Introduction

This Policy sets out GreenSquareAccord's (GSA's) commitment to ensuring compliance with gas safety legislation, regulations and best practice within the properties it owns and manages.

This Policy also sets out our approach to managing Carbon Monoxide safety.

It is supplemented by a Servicing and Maintenance of Gas Systems (Domestic & Commercial) Procedure which sets out more detail on our approach to managing gas safety.

The aims of this policy are to:

- Ensure that we are fully compliant with all legislation and regulations that applies to gas safety.
- Set out how we will deliver our responsibilities through safe installation and regular inspection, maintenance and upgrades.
- Inform our customers, colleagues and stakeholders about the approach we take in ensuring their safety and explain how they can support us to deliver this.

3. Scope of Policy and Exclusions

The scope of this Policy covers all properties owned and managed by GSA including:

- Domestic properties - general needs housing, extra care housing, supported housing, 55+ housing, sheltered housing and other rented properties owned and managed by GSA
- Non-domestic properties - offices, depots, shops, other commercial buildings, blocks and communal areas/common parts, remote plant, and garages
- All properties, where under a tenancy agreement, lease or contract, GSA has responsibility for maintenance and repairs to Gas Fittings, including the control of access of maintenance workers into the building and completion of gas safety checks.

For Third Parties – Including Managing Agents, Co-ops, Almshouses and Commercial Tenants:

- Where GSA has a management agreement, or lease which places responsibility on GSA to carry out gas servicing and repairs, these shall be undertaken in line with our contractual requirements.
- Where GSA has no responsibility for gas safety activity, but the property is owned by GSA, we will seek written confirmation that the relevant third party are aware of their legal obligations and request the relevant documentation. Records will be kept for a period of three years.

In addition to the above, and to meet the requirements under the Regulator of Social Housing Tenant Satisfaction Measures, GSA will endeavour to obtain a copy of the gas safety check from low-cost rental accommodation (LCRA) and low-cost home ownership (LCHO) properties

It does not include Leaseholders and Shared Owners, as the obligation to carry out the gas safety check lies with the Leaseholder or Shared Owner and not with GSA.

4. Definitions

Gas Appliance	Means an appliance for the heating, cooking or other purposes for which gas can be used. This includes communal boilers. In general, portable or mobile appliances are not covered, except the use of portable or mobile space heaters (e.g. LPG cabinet heaters).
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Gas Fittings	Means pipework, valves (other than emergency controls), regulators and meters and fittings etc. designed for use by consumers of gas.
Gas Safe Register	This is the official list of gas businesses and engineers who are registered to work safely and legally on gas boilers, cookers, fires and all other gas appliances.
Landlord's Gas Safety Record (LGSR)	This is the documentation completed by the gas engineer following an annual gas safety check.
Regulations	Means the Gas Safety (Installation and Use) Regulations 1998.

5. Roles and Responsibilities

5.1. The **Group Board** is responsible for ensuring that management of health and safety and asset compliance meets statutory and regulatory requirements and is sufficiently resourced. This includes GSA's approach to the management of gas safety.

5.2. The **Executive Board** is responsible for putting appropriate arrangements and resources in place for ensuring the safety of customers, colleagues and others so that GSA complies with legal and regulatory standards.

The Executive Board is also responsible for reporting any breach in standards to the GSA Board and reporting any regulatory breaches to the Regulator of Social Housing in line with organisational policies.

5.3. The **Chief Property Officer** is responsible for:

- Ensuring that appropriate mechanisms are in place for monitoring compliance with gas safety legislation, regulation and policies and procedures.
- Reporting levels of compliance to GSA's Board.
- Ensuring that appropriate resourcing and arrangements are in place (in line with budget capacity) to meet the regulatory, legislative and statutory requirements relating to gas safety including sufficient resources to fulfil the Responsible Person role/s for all gas safety requirements.

5.4. The **Director of Repairs and Maintenance** is responsible for

- Ensuring appropriate procedures and processes are in place to meet the requirements contained within this policy.
- Ensuring the operational delivery of this policy to achieve compliance with statutory requirements.
- Raising any material issues of non-compliance to the Executive Board or the Head of Health and Safety.
- Ensuring the appropriate resourcing and arrangements are in place for the delivery of all gas safety works, both internally resourced and those undertaken by external contractors.
- Ensuring that cyclical investment programmes are in place for upgrades to Gas Fittings, Gas Appliances (including boilers), flues, radiators and pipe work.

- Ensuring contractors engaged to carry out gas safety works are procured with the required qualifications and competency, and in line with GSA's policies and procedures.

5.5. The **Head of Health and Safety** is responsible for:

- Reviewing reporting (second line assurance) on gas safety compliance to the Financial Performance and Monitoring Group and Executive Board.
- Ensuring that GSA has appropriate procedures, processes and internal controls in place which comply with all legal, regulatory and policy requirements.
- Ensuring that appropriate mechanisms are in place for monitoring compliance with gas safety legislation, regulation and policies and procedures.
- Reporting all material issues of non-compliance (whether potential or actual) to the Executive Board.

5.6. The **Head of Heating and Electrical (HH&E)** is responsible for:

- Acting as the first point of contact and competent person for all gas safety related matters.
- Reviewing changes to legislation, regulations and industry best practice raising any changes to the Director of Repairs and Maintenance and Head of Health of Safety, to ensure that this policy remains compliant.
- Maintaining a master asset database of all properties (domestic and commercial) where we have a responsibility to carry out gas safety checks and maintenance.
- Managing the availability of correct stock data and landlord compliance data subsets against which work programmes and contracts are prepared.
- Overseeing data reconciliation exercises to ensure that all properties for which we have a responsibility are included on the servicing programme.
- Reporting (first line assurance) on gas safety compliance to the Financial Performance and Monitoring Group, Executive Board, the GSA Board and its Committees.
- Ensuring the operational delivery of this policy by monitoring the performance of all work streams undertaken to ensure compliance with statutory requirements and this Policy. This includes:
 - Ensuring completion of Landlord's Gas Safety Records (LGSR) within 12 months of the anniversary date of the previous LGSR (or initial installation) in all properties with Gas Fittings, in accordance with the regulations.
 - Ensuring that gas fittings, appliances, associated pipework and flues that we are responsible for are maintained in a safe condition.
 - Providing gas safety information to, and overseeing ongoing communication with, customers, including managing customer feedback (enquiries, investigation and resolution of complaints, compliments) in respect to gas safety.
 - Ensuring that records are kept giving details of all appliances checked during the LGSR visit, including details of which appliances were checked, what

checks were completed, the date(s) of the LSGR, details of any defects identified, and remedial actions required/taken.

- Keeping a copy of the LSGR for a period of not less than three years on a suitable document management system.
 - Providing a hard copy of the LSGR to the customer within 28 days of the check via the post (and to any new customer).
 - Liaising with colleagues to ensure stock condition data and landlord compliance data sub-sets are accurate, updating system(s) with accurate data in line with data protocols.
 - Reviewing property addresses and reconciling with contractor databases to ensure work programmes remain accurate.
 - Ensuring that systems are in place to provide robust and accurate performance management data on gas safety compliance.
- Reporting on the delivery of gas safety works against agreed programme/s.
 - Regularly reviewing Internal service provider and/or external contractor operational practices and performance with the Head of Health and Safety.
 - Ensuring regular gas safe audits are conducted by external third-party (Corgi), providing feedback and actions resolutions to the Head of Health and Safety.
 - Communicating this Policy to internal colleagues and contractors.
 - Identifying and managing the risks associated with gas safety in residential and commercial properties.
 - Ensuring that GSA colleagues and contractors employed to deliver the commitments outlined in this policy have the skills, knowledge, training, qualifications, competence and experience necessary, and monitoring their operational practices and performance. Receiving audit feedback and acting upon findings.
 - Recording all reasonable steps taken to comply with the law including escalating any 'no access' properties to the Housing team for action, as per the Access Procedure.
 - Reporting all material issues of non-compliance (whether potential or actual) to the Head of Health and Safety.
 - Contract management of any external contractors in line with this Policy.
 - Implementing and maintaining Data Governance Protocols for gas safety data.

5.7. The **Head of Data and Analytics** is responsible for:

- Ensuring that GSA has appropriate controls in place for ensuring the accuracy and integrity of data reported as part of the Performance Committee Pack.
- If appropriate controls can't be put in place this is flagged through the Kitemark assessment for the relevant performance measure.

5.8. The **Head of Procurement** is responsible for:

- Ensuring that the Group Procurement Policy is followed for the procurement of any gas contractors by contract managers, including appropriate technical and health and safety training/qualifications.

5.9. Gas Engineers (internal and external) are responsible for:

- Following the provisions of this Policy and any associated procedures.
- Operational delivery of Gas Safety checks, maintenance and repairs in line with this Policy.
- Liaising with customers in relation to arranging/keeping appointments.
- Liaising with the Housing Team in relation to no access issues.
- Providing appropriate, complete, and correct certification for all gas safety checks and servicing.
- Providing quality assurance checks in accordance with contract requirements.
- Maintaining technical and professional competency and qualifications (their own and those of their teams), including Gas Safe registrations.
- Escalating instances of 'no access' to the Head of Heating and Electrical following the second unsuccessful attempt at contact.
- Ensuring that no gas supplies are capped without the relevant approval under this Policy.

5.10. Managers are responsible for:

- Ensuring the effective day to day management of health and safety (including gas safety) within their scope of responsibility.
- Escalating any gas safety concerns to the Head of Heating and Electrical or Head of Health and Safety.
- Ensuring that any accidents, incidents, near misses and hazards are recorded, reported and investigated.
- Ensuring colleagues attend gas safety training, relevant to their role.
- Ensuring gas safety information is disseminated to GSA colleagues and customers as appropriate.
- Ensuring effective communication of gas safety information to relevant stakeholders.

5.11. All GSA colleagues are responsible for:

- Taking reasonable care of themselves and others around them.
- Reporting any hazards, defects, shortcomings or issues of non-compliance regarding gas to their line manager (escalating to the Gas Safety Team where required).
- Completing any mandatory gas safety training relevant to their role within stipulated timeframes.
- Ensuring all work undertaken is compliant with all health and safety policies, procedures, associated instructions and working practices and statutory regulations and codes of practice.

5.12. Customers are responsible for:

- Allowing GSA colleagues or contractors access to the property for the purposes of annual gas servicing as per the terms of their tenancy agreement.

- Reporting any concerns with gas appliances and turning them off until they are checked by a contractor on the Gas Safe Register.

6. Policy

6.1. Management of Gas Safety

The Gas Safety (Installation and Use) Regulations 1998 state that all landlords are responsible for:

- Maintaining Gas Fittings and flues associated with their property in a safe condition;
- Checking those Gas Fittings and flues annually;
- Keeping records of those checks for at least two years; and
- Ensuring that all checks and work on these Gas Fittings and flues are carried out by a person approved by HSE (currently those listed on the Gas Safe Register).

We ensure that all safety checks, servicing and maintenance requirements are managed effectively and in line with relevant legislation and regulations.

Where we do not have sufficient capacity in-house to carry out the gas inspection and servicing programmes, we may outsource to an external contractor whose delivery of the requirements will be robustly monitored and via an appointed approved Gas Safe contractor.

6.2. Inspections and Servicing – Gas Fittings and Flues

We ensure that Gas Fittings and flues will be maintained in a safe condition by carrying out regular gas safety checks. A Landlord's Gas Safety Record (LGSR) is completed a minimum of annually (within 12 months of the anniversary date of the LGSR) to all properties with Gas Fittings in accordance with the Regulations.

In some circumstances, LGSRs are completed more frequently than annually. Frequencies of other inspections are as follows:

- **New properties acquired by GSA** - Newly developed or purchased properties shall have a gas safety inspection completed prior to occupation by a new customer. If a customer is in situ on the date of purchase, a new gas safety check shall be completed by a Gas Safe registered engineer.
- **Void or Empty Property Management** - Before re-occupation of a property by a new customer, a gas safety check must take place and a new LGSR issued. A copy of the LGSR should be issued to the customer within 28 days.
- **Mutual Exchange Property Management** - Mutual exchange properties shall have a gas safety check completed on the date of the mutual exchange-taking place. A new LGSR shall be issued to the customer within 28 days.
- **Other circumstances** - A Landlord's Gas Safety Record (LGSR) shall be completed in all of the following circumstances:
 - Refurbishment which has necessitated work or alterations to Gas Fittings, flues or pipework;

- o A Gas Appliance is replaced or installed by GSA; and/or following the uncapping of a previously capped gas supply.
- o Gas related fire risk assessment (FRA) action e.g. relocating gas meter within converted premises.

6.3. Inspections and Servicing – Gas Appliances

We will ensure that any Gas Appliances supplied or installed by GSA are inspected in line with manufacturer's instructions, usually every twelve months as part of the annual gas safety check (LGSR).

Although we do not have a legal responsibility for carrying out a safety check to appliances owned by the customer, we will check all customer-owned gas appliances for safety as part of the annual gas safety check. Any safety critical faults found on a customer-owned appliance will result in the appliance being made safe and the customer informed.

6.4. Maintenance, Replacement and Repair

Following the completion of the LGSR, we will complete or commission any required repairs or replacements of Gas Fittings or GSA owned Gas Appliances, in line with any recommendations made by the Gas Safe engineers.

Repairs of customer-owned devices will not generally be carried out by GSA, unless a customer is likely as a result to experience extreme hardship as a result of this Policy (for example if they are particularly vulnerable). In these circumstances a referral can be made to the Tenancy Sustainment Team for support.

Remedial works arising from safety checks will be undertaken in accordance with the recommendations made by the Gas Safe engineer / contractor. The Head of Heating and Electrical is responsible for raising the relevant works and managing these to completion.

The Director of Repairs and Maintenance is responsible for ensuring that cyclical investment programmes are in place for upgrades to Gas Fittings, Gas Appliances (including boilers), flues, radiators and pipe work.

6.5. Access Arrangements

Customers are required to provide access to GSA engineers and approved contractors to allow us to carry out gas safety checks, maintenance and repairs in accordance with their tenancy agreement.

We will provide customers with reasonable notice for carrying out gas safety checks and works, to minimise any disruption.

If we are unable to gain access to a property for the purposes of carrying out the gas safety check, we may escalate this in accordance with our Access Procedure which set out our

process for gaining access to properties. Under the Procedure, after two unsuccessful attempts to gain access have been made, the Head of Heating and Electrical may refer the case to the Localities Team to secure an injunction for access.

6.6. Gas Capping

Capping undertaken by GSA to protect the safety of the Customer: We will seek to avoid the capping of gas supplies wherever possible. This is seen as a remedy of last resort and will generally only be used for an interim period to ensure customer safety while we seek access to carry out the annual gas safety check (including via a legal process). Capping will only be undertaken following a risk assessment and has to be signed off by the Locality Manager and Operations Manager (Heating and Electrical) or Head of Heating and Electrical. Cases where properties have been capped will be subject to close management and monitoring. Further information on how we manage capping is set out in the Servicing and Maintenance of Gas Systems (Domestic and Commercial) Procedure.

Capping at the request of the Customer: We no longer cap gas supplies as standard at the request of the customer. We have found that this is often linked to an underlying issue (such as financial difficulties) and would prefer to support our customers to get help. Any customer requests to cap gas supplies must be risk assessed and approved by a Regional Locality Manager and the Head of Heating and Electrical. Risk assessments should consider the customer's vulnerability, what support GSA has provided and be reviewed annually. Risk assessments should be retained for the period that the capping remains in place.

Where a gas supply has been terminated outside the property by the Network Supplier and GSA is in receipt of a disconnection certificate, no LGSR will be required. In all other circumstances GSA will continue to seek access on an annual basis to carry out the LGSR. This includes properties which do not have a disconnection certificate, but which are identified as having an internal gas supply (within the boundary of the property) up to and including the meter (upstream supply) but having no internal Gas Fittings or Gas Appliances.

6.7. Carbon Monoxide and Smoke Alarms

We will install carbon monoxide and smoke alarms in all properties where we have Gas Fittings or Gas Appliances. These will be tested annually as part of the gas safety check and noted on the LGSR. Where properties do not have gas, smoke alarms will be tested as part of the five-yearly EICR inspection (see Electrical Safety Policy).

Please refer to the Solid Fuel Policy and the Servicing and Maintenance of Gas Systems (Domestic and Commercial) Procedure for more information about carbon monoxide and smoke alarms and ensure that the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 are followed.

6.8. Additional Safety Measures

We shall ensure that no gas fitting of a type that contravenes Regulation 30 of the Gas Safety (Installation and Use) (Amendment) Regulations 2018 (which cover certain gas fires and instantaneous water heaters) is installed in any room occupied or to be occupied as sleeping accommodation.

We will neither install, nor give permission for customers to install, wood-burning stoves or open fires. Any unauthorised installations will be required to be removed at the customer's own expense and by our appointed contractor.

6.9. Operational Record Keeping

An electronic Landlord Gas Safety Record (LGSR) shall be created from each gas safety check. These will be checked by Gas Team prior to final upload to the master asset database. The record of a gas safety check must contain:

- ☐ A description of and the location of each appliance and flue checked
- ☐ The name, registration number and signature of the individual carrying out the check
- ☐ The date on which the appliance or flue was checked
- ☐ The address of the property at which the appliance or flue is installed
- ☐ The name and address of the landlord
- ☐ The effectiveness of the flue
- ☐ The supply of air
- ☐ The operating pressure or heat input
- ☐ The safe functioning of appliances
- ☐ Any safety-related defect identified, and any remedial action taken

All test information carried out during gas work or visual examinations must be recorded on the relevant GSA electronic forms or in the case of an unsafe situation, a warning notice **MUST** be completed, and a copy of this document shall be left with the customer.

The Head of Heating and Electrical is responsible for ensuring that records of LGSRs for all properties are maintained in a secure location and can be cross-referenced (where held on a separate system) with the asset database. A minimum of the last 6 years records will be held for each property requiring a gas safety inspection. Where a property is sold or disposed of, records shall be held for a minimum of 6 years after the last inspection was completed.

The Head of Heating and Electrical is responsible for ensuring that customers are issued with a copy of the latest LGSR to customers within 28 days of the gas safety check being completed, or to any new customer before they move in.

The Head of Heating and Electrical is responsible for ensuring that a copy of the latest LGSR is displayed in the common area of a building where the gas appliance serves a communal heating system to multiple homes.

The Heating and Electrical Team in collaboration with the Property Compliance and Housing Teams will endeavour to obtain a copy of the gas safety check from low-cost rental accommodation (LCRA) and low-cost home ownership (LCHO) properties.

7. Monitoring and Reporting

The Head of Heating and Electrical is responsible for maintaining a master database where GSA have a responsibility to provide gas safety checks and maintenance.

The Head of Heating and Electrical is responsible for the daily monitoring of gas safety with records held electronically including

- A copy of the current and previous LGSR and the date of when the next test is due. and associated KPIs and escalating issues in line with risk. They are also responsible for monitoring:
- The number of overdue LGSRs and their position in terms of legal action to be taken, or whether they are scheduled to have the gas supply capped;
- The number of capped properties and associated welfare checks / risk assessments.
- Training records, which is held by the Learning and Development team.

Completion of LGSRs is reported to the Financial Performance and Monitoring Group via the monthly Performance Pack. Any significant performance deterioration may trigger a recovery plan following discussion between the Financial Performance and Monitoring Group and the GSA Performance Manager. The report will also include the number of capped properties, including the duration of each cap, which will form part of the supporting narrative.

Performance scorecards including the % of properties with a compliant LGSR are reported to GSA Board, Executive Board and Operations Committee.

8. Assurance

- First Line assurance - The Heating and Electrical Team carry out a manual validation of all LGSRs generated by engineers and carry out a sample desk top certificate audit (recorded) weekly. In addition, each engineer is audited 3-4 times a year to check the quality of work in progress and post-completion audits by a gas safe qualified engineer.
- Second Line Assurance is via the Health and Safety Team who usually act as the internal assurance function for GSA and carry out periodic audits, which includes the presence of current LGSR, escalating any concerns to the Heating and Electrical Team and relevant Head of Service and Director.

Second line assurance is also provided by the Performance Improvement Team who check data as part of KPI / performance reporting.

- Third line assurance is undertaken by GSA's internal auditors, who complete periodic audits on building safety matters, which are fed back to Executive Board and Audit and Risk Committee including any actions required.

Third line assurance is also provided by CORGI Technical Service who carry out independent audits of gas works on behalf of the Heating and Electrical team.

9. Equality Impact Assessment

We take account of known individual or collective needs identified on the internal housing system (MRI) when planning our gas safety arrangements. Where needs are identified, we put in place bespoke arrangements as required.

10. Data Protection Considerations

Consideration has been given to data protection by ensuring this policy adheres to data protection principles, including confidentiality, fairness, transparency and data minimisation.

11. Training and Competency

All identified colleagues, through the job-role specific training matrix, will have and maintain their relevant training to be registered with Gas Safe Register.

11.1. Competency

All checks and work carried out on Gas Fittings and Gas Appliances must be carried out by a Gas Safe Registered person, which is checked by the recruiting or contract manager. As a minimum this will require the following:

- External contractors will be Gas Safe registered and use Gas Safe registered engineers with the necessary competencies to undertake any gas-related works in line with the requirements of the Nationally Accredited Certification Scheme (ACS).
- All contractor and operative competencies will be subject to annual review or upon any change of contract, contractor, or statutory requirements or codes of practice.
- All in-house colleagues will be Gas Safe registered against GSA's Gas Safe company registration.
- A detailed competency framework will be in place to provide assurance that all internal colleagues are appropriately skilled and are subject to regular (re)appraisal.

There is a risk that other repairs and maintenance activity unwittingly impacts gas safety. GSA will manage this risk by ensuring that repairs and maintenance contractors (both internal and external) have a general awareness of gas safety – in particular in relation to flues and ventilation - in order to inform a Dynamic Risk Assessment when undertaking responsive repairs.

Training requirements for relevant roles are reviewed by the Learning and Development Lead, the relevant operational Head of Service and the Head of Health and Safety, to ensure that these meet legal requirements and best practice.

12. Communication and Implementation

Communication

- Letters to customers in connection with gas safety will reiterate the importance of gas safety in the home, including allowing access for safety checks, inspections, servicing, and remedial works.
- All customers will receive an information leaflet relating to gas and carbon monoxide safety as part of their Tenancy Pack. The full range of safety leaflets will also be available on our website and through the intranet for all colleagues. Information will be available in different formats.
- Safety awareness campaigns will be undertaken to promote and improve customer understanding of gas safety issues and the importance of the cyclical safety check/inspection, servicing and of reporting repairs promptly.

Information will be available in different formats as requested, tailored to individual requirements.

This Policy will be communicated to colleagues via the internal intranet and the Health and Safety communication programme.

13. Legal and Regulatory Framework

- The **Gas Safety (Installation and Use) (Amendment) Regulations 2018**: The legislation sets out the legal duties on those who install, service, maintain or repair gas appliances and other gas fittings. Landlords also have duties under these regulations.
- **Gas Safety (Installation and Use) (Amendment) Regulations 2018 Approved Code of Practice L56 (fifth edition)**: Gives advice on how to meet the requirements of Gas Safety (Installation and Use) (Amendment) Regulations 2018.
- **Health & Safety at Work etc Act 1974**: The primary piece of legislation covering occupational health and safety in Great Britain.
- The **Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022**: Provides duties for landlords to install, repair and replace carbon monoxide alarms.
- The **Landlord and Customer Act 1985 section 11**: Sets out a landlord's obligation to maintain and repair a privately rented home.
- The **Housing Health and Safety Rating System (HHSRS)**: Helps local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.
- A guide to landlords' duties: **Gas Safety (Installation and Use) Regulations 1998 as amended (HSE INDG 285)**: This guide is aimed at landlords and explains some of the main requirements the Gas Safety (Installation and Use) (Amendment) Regulations 2018. The guide is also of interest to tenants, making them aware of landlords' duties.

- **Safety and Quality Standards (S&QS)** – a set of standards by the Regulator of Social Housing (RSH) in the UK to ensure that social housing providers deliver safe, decent and well-maintained homes for tenants.

14. Information Sharing and Confidentiality

We will provide information as required in line with relevant law and regulation.

We collect information (personal data) to enable us to:

- manage and support our relationship with customers to comply with legal obligations
- improve our services
- achieve our legitimate business aims

We are committed to complying with data protection legislation when handling data.

Customers have rights including access to their data and to object to the way it is processed. For more information on how and why we process customer data and how customers can exercise their rights please view our full Privacy Policy on our website at [Privacy notice – GreenSquareAccord](#).