

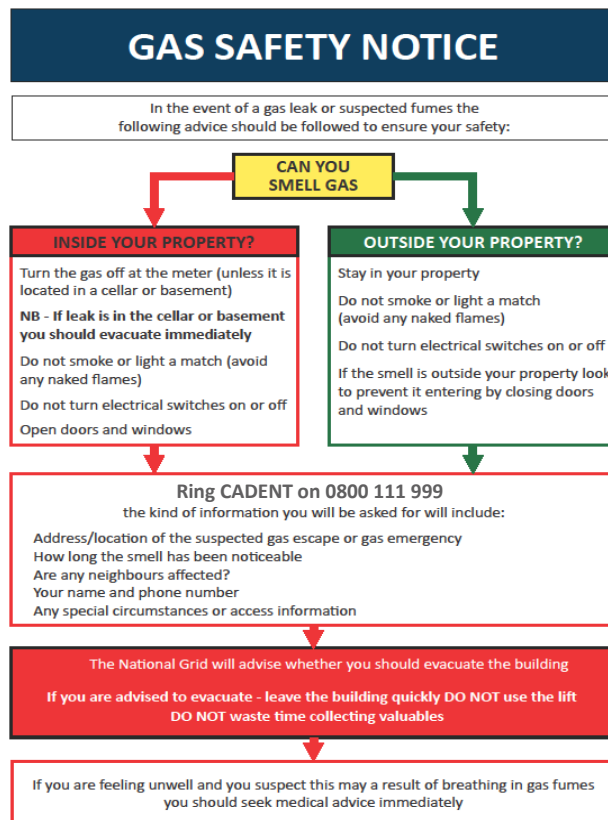


Gas Safety Policy

Originator:	Policy and Strategy Team
PCHA Approval Date:	January 2024
Review date:	January 2027

1 Introduction

- 1.1 Pine Court Housing Association (PCHA) treats the health and safety of tenants, staff, contractors and other users of its buildings of paramount importance. PCHA recognise the risks to health and safety of carbon monoxide poisoning or risk of fire / explosion caused by gas appliances and flues which have not been properly installed or maintained.
- 1.2 In recognising the above risks PCHA always adopts a safety-first approach and provides practical advice to all of its tenants on what to do in the event of a gas emergency. Any person that is accessing this Policy as a source of information on what to do in an emergency should follow the advice below:



- 1.3 Where PCHA receives a call from a customer with a suspected gas leak or fumes PCHA will transfer the customer direct to Cadent (formerly the National Grid).

- 1.4 This Policy sets out PCHA’s responsibilities to comply with the relevant legislation and associated regulatory guidance on the safe installation, maintenance and use of gas systems, including gas fittings, appliances and flues in properties it controls and manages.
- 1.5 The Policy also sets out the provisions PCHA will put in place for the annual inspection and safety testing of gas, solid fuel and Liquefied Petroleum Gas (LPG) fuel appliances in domestic properties it owns or manages.
- 1.6 Key legislation and guidance includes:
- The Gas Safety (Installation and Use) Regulations 1998
 - Health and Safety at Work Act 1974
 - Management of Health and Safety at Work Regulations 1999
 - Housing Act 2004 – Housing Health & Safety Rating System
 - Technical bulletins from the Gas Safe Register
 - Building Regulations (Part J)
 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
 - Homes (Fitness for Human Habitation) Act 2018
 - Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- 1.6.1 Specific reference has also been made to relevant the Health and Safety Executive Approved Codes of Practice and Guidance.
- 1.6.2 The Gas Safety policy should be read in conjunction with:
- PCHA Health and Safety Policy
 - PCHA Repairs, Maintenance and Planned Works Policy
 - PCHA Access to Properties Policy
 - PCHA Fire Safety Policy
- 1.7 In regard to the above legislation a summary of PCHA’s duties include requirements to:
- Ensure gas fittings and flues are maintained in a safe condition and that appliances are serviced in accordance with manufacturer’s instructions or at least annually (unless otherwise advised by a Gas Safety registered engineer)
 - Ensure an annual safety check is carried out on each gas appliance / flue and carry out these checks within 12 months of a tenancy commencement date, unless the appliances in the property have been installed for less than 12 months (in which case they should be checked within 12 months of their installation date)
 - Have all installation, maintenance and safety checks carried out by a Gas Safe registered engineer (with LPG, HETAS and Commercial Gas specialisms for solid and LGP fuels, as required)
 - Keep a record of each safety check for at least two years
 - Issue a copy of the latest Landlords Gas Safety Record (safety check) record to PCHA tenants within 28 days of the check being completed or to any new tenant before they move in
 - Maintain a Landlords Gas Safety Record (LGSR) for each property under PCHA’s control and amend the register in accordance with any changes made to the property (i.e. installation of or removal of gas supply or appliances)

1.8	<p>The application of this Policy ensures that PCHA meets compliance with the outcomes of the Regulatory Framework for Social Housing in England introduced by the Regulator for Social Housing as outlined below:</p> <ul style="list-style-type: none"> When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas
1.9	<p>Access and Communication</p>
1.9.1	<p>PCHA is committed to ensuring that the services it provides are accessible to everyone. PCHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for PCHA or use its services.</p>
1.9.2	<p>Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers’ needs in our service delivery and ensure this information is kept up to date.</p>
1.10	<p>Equality, Diversity and Human Rights</p>
1.10.1	<p>PCHA is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Marriage and Civil Partnership, Pregnancy and Maternity, and Religion and / or Belief.</p>
1.10.2	<p>PCHA also recognises that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p>
1.10.3	<p>PCHA will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make every effort to ensure staff and others with whom PCHA works, will adhere to the central principles of the Human Rights Act (1998).</p>
2	<p>Statement of Intent</p>
2.1	<p>PCHA will comply with all legal and regulatory requirements in meeting its responsibilities to ensure gas safety and use of solid and LPG fuel systems in the properties it owns or manages.</p>
2.2	<p>To satisfy itself, tenants, contractors and other users of its buildings that it reaches the highest standards in gas safety, PCHA will operate a comprehensive gas safety management system and supporting procedures that are appropriately resourced and supported by cross team / PCHA working practices.</p>
2.3	<p>The above procedures will ensure PCHA operates ‘firm but fair’ working practices when attempting to ensure Landlords Gas Safety Records are completed and valid gas safety certificates are maintained at all times. To this effect PCHA will:</p>

	<ul style="list-style-type: none"> • Inform all tenants in writing (and in their preferred format) 56 days before the expiry of the Landlord Gas Safety Record (LGSR) or equivalent for solid or LPG fuels and give an initial appointment date for a new safety check (tenants can request alternative appointments if inconvenient) • Make numerous attempts to contact the customer via letter, phone, email and / or personal visit if an appointment cannot be arranged • Monitor the position of all properties where gas safety checks remain outstanding through monthly meetings attended by cross-functional team including contractors and continue efforts to contact tenants and arrange access. PCHA will deal with any suspected abandoned properties in line with it's the Suspected Abandoned Properties Procedure • Consider using the emergency access procedure as provided within the terms of the tenancy agreement • Throughout the above processes work with external agencies and advocacy groups where tenants are known to be vulnerable for any reason and require additional support <p>2.4 PCHA will set stringent and challenging targets in providing gas safety services with a minimum of top quartile performance when benchmarked against similar housing providers and will strive to be an exemplar of best practice for the housing sector in carrying out LGSR checks.</p> <p>2.5 PCHA will ensure that all operatives that are employed to carry out installation, removal, maintenance or safety checking work to gas fittings or flues are suitably competent and are Gas Safe registered in accordance with regulation 3(3) of the Gas Safety (Installation and Use) Regulations 1998 (with LPG, HETAS and Commercial Gas specialisms for solid and LPG fuels as required).</p> <p>2.6 PCHA will ensure any contractor it employs to carry out installation, removal, maintenance or safety checking work to gas fittings or flues and solid / liquid fuel systems, are suitably competent and have Gas Safe registered operatives through its procurement and preferred supplier processes.</p> <p>2.7 In order to maintain its excellent track record of promoting gas safety, PCHA will not grant any new permissions for tenants to install gas fire appliances in their properties via the 'request to make alterations procedures'.</p>
3	Policy
3.1	PCHA Responsibilities
3.1.1	As a duty Holder, PCHA will fulfil its legal responsibility to deal with the safe installation, maintenance and use of gas systems, including gas fittings, appliances and flues in the domestic and commercial premises they own and control (as per Regulation 36 of the Gas Installation and Use Regulations).
3.1.2	Although, PCHA may employ external contractors to carry out this work on its behalf, it remains the responsible body for ensuring gas safety to tenants and other users of the buildings it owns or manages.

3.1.3 In fulfilling its gas safety duties (and with specific reference to its responsibilities as a landlord and as per Regulation 36 of the current Gas Safety Installation and Use Regulations), PCHA will take action in the following areas (see 3.2 to 3.11).

3.2 **Gas Safety Maintenance**

3.2.1 PCHA will ensure the safe maintenance of gas appliances, flues and installation pipework installed, and solid / LPG fuel systems in premises under its control via an ongoing programme of regular / periodic inspections, together with any necessary remedial work. This will include specific maintenance requirements defined in manufacturer instructions or where this is not available via a check of the physical condition of the appliance, installation pipework, air vents and any flue deterioration, testing and remedial action (on a prioritised risk assessment basis).

3.3 **Annual Safety Checks (Landlords Gas Safety Record – LSGR)**

3.3.1 PCHA will carry out annual safety checks on all properties at no more than 12-month intervals (this is in addition to any safety checks required when an appliance is first installed). In line with Gas Safety (Installation and Use) (Amendment) Regulations 36a 2018, PCHA has implemented an ‘MOT-style’ approach to the annual inspection. Under this new legislation, landlords can have the check completed any time in the 2 months before the current certificate expires and still retain its original expiry date. See section 2.3 for the approach and process PCHA uses when carrying out annual safety checks or maintaining the LSGR. As a minimum the LSGR will contain:

- Description and location of each appliance and / or flue checked
- Name, registration number and signature of the engineer who carried out the check
- Date on which the appliance and / or flue was checked
- The address of the property at which the appliance and / or flue is installed
- PCHA’s full address and contact details
- Any defect identified and any action required or taken to fix it
- Confirmation of the results of operational safety checks carried out on the appliances

3.3.2 The above checks will be carried out in all domestic properties owned or managed by PCHA, including those that may have a gas supply, but where this is not used. The only exceptions to these requirements are some high-rise blocks where PCHA has removed the gas supply and Retirement Living premises where there is no gas supply to individual properties and properties that are off the gas infrastructure e.g. rural areas. PCHA will, however, conduct annual safety checks in Retirement Living premises where there is gas fired communal hot water systems or communal cooking facilities.

3.3.3 Where any defects are identified during the annual safety check that are the responsibility of PCHA to rectify, PCHA will ensure prompt remedial action if deemed ‘Immediately Dangerous’ or ‘At Risk’ and will ensure the appliance is not used until the fault is remedied.

3.4 **Safety Checks Before Tenancies Commence**

3.4.1 When PCHA are informed of empty properties, it will cap off the gas supply on the next working day or sooner if possible and produce a cap-off certificate before void works commence to bring the property back up to a lettable condition.

3.4.2 PCHA will ensure a full gas safety check is carried out at the start of any new tenancy and that the new tenants receive a copy of the current LGSR (gas safety certificate) within 28 days of moving in.

3.5 Gas safety Checks for New Build Properties

3.5.1 PCHA will cap off gas supplies in all new build properties at handover and the supply will be reconnected once the property is occupied by the new tenant / buyer. PCHA will ensure any unoccupied property used for sales / viewing purposes will be maintained the same as with an occupied property.

3.6 Tenants Own Gas Appliances

3.6.1 In circumstances where Gas Safe registered engineers (carrying out safety checks on PCHA's behalf) discover that a tenant's own gas appliances may be faulty, they will:

- Inform the tenant and issue a written warning notice that the appliance is unsafe, and that continued use is an offence
- Attempt to persuade the tenant that they (the engineer) should disconnect the appliance until such time as the tenant can arrange for their own Gas Safe registered engineer to repair the existing appliance or install a new safe appliance
- Label the appliance as unsafe where the above consent is refused
- Contact the gas supplier and inform them of their actions - (who may use powers to enter the property and take action to avert danger to life (and property))
- Inform PCHA of all actions taken

3.6.2 PCHA will not permit the use of or storage of compressed gas or Liquid Petroleum Gas (LPG) for portable appliances within its properties or communal areas unless in exceptional circumstances i.e. oxygen for medical reasons.

3.6.3 If a customer is required to use and store compressed gas for medical reasons (i.e. oxygen), we will advise them to contact the local Fire and Rescue Service **0800 731 5958 (for customers in Merseyside)** who will arrange to carry out a home fire safety check.

3.6.4 Where Gas Safe Engineers found tenants are using LPG in portable appliance within an PCHA property or communal areas, PCHA will refer them to the Neighbourhood Housing Team, to advise them of the dangers of using / storing LPGs within their home and provide advice on alternative forms of heating or include them on programmes for heating replacements.

3.6.5 In addition, Gas Safe engineers working for or on PCHA's behalf will:

- Carry out a visual check of gas cooking appliances
- PCHA has an obligation under the Gas Safety (installation and Use) Regulations 1998 to ensure that chimneys and flues in its properties are maintained as being fit for purpose. Where tenants have installed their own free-standing outset, conventional fire (with the landlord's permission and where the manufacturer's instructions are available), PCHA will remove the fire and enable a full inspection of the flue to be carried out
- Where tenants have installed an Insert Decorative Flue Effect (DFE) fire, PCHA will, with the tenants' permission disconnect the fire via an isolation valve (where one exists). The tenant will then be required to arrange for their own Gas Safe Registered

Engineer to inspect the fire and flue (at their own expense) and pass on the inspection certificate to PCHA once complete. If tenants refuse permission for the fire to be disconnected PCHA will label the fire as being unsafe for use

- PCHA will also inspect Carbon Monoxide detectors in domestic properties (either portable or hard wired) where they exist.

3.6.6 Where a new kitchen is being installed, PCHA will disconnect and reconnect gas cookers for customers as part of kitchen installation work provided it is safe to use. If the gas cooker is found to be unsafe to use, PCHA will advise the customer and apply Gas Industry Unsafe Procedure (GIUSP) as required by the Gas Safety (Installation and Use) Regulations 1998.

3.6.7 For any appliance that is classified as 'At Risk', or 'Immediately Dangerous' (ID), the gas operative will (with the permission of the customer) disconnect or isolate it from the gas supply and advise the tenant that it is an offence to use the appliance until it has been repaired or replaced by a Gas Safe Registered operative. If the permission is refused, the operative will inform the client and escalate the case to Cadent (formerly the National Grid).

3.7 **Maintain Gas Safety Records**

3.7.1 PCHA will maintain records of all annual safety checks undertaken for a minimum period of two years from the date of the inspection and ensure tenants receive a copy LGSR as soon as is reasonably practical (either electronically or in paper copy and specifically in paper copy if requested by the tenant) after the safety check and no more than 28 days for new tenants moving in. Records will be kept securely and will not be shared with third parties without the tenants' consent.

3.8 **Remove All Gas Fires from Void (Empty) Properties**

3.8.1 As all PCHA rented properties have alternative forms of space heating and as part of an on-going commitment to improve gas safety, PCHA will cap off the supply and remove gas fires from all voids (empty) properties during the void period. PCHA will also seal up any hearth spaces left behind by the removal of gas fire appliances.

3.9 **Removal of Gas and Solid Fuel Fires from Occupied Properties**

3.9.1 If during the annual gas safety check or attendance to a repair it is found that a flue, chimney or associated heating appliance is defective and uneconomical to repair then PCHA will look to remove the appliance and close up any openings to the flue or chimney. Consideration will be given to what other forms of heating are present in the room and wider home and will discuss with the tenant before proceeding with any alterations.

3.9.2 If fires have been installed with PCHA's prior permission via the 'Right to Alter' process, PCHA will recompense tenants for any gas fire appliances they have installed at their own expense (this figure will then be deducted from any future Right to Improvements payments they may be due on ending the tenancy).

3.9.3 Where flues are economically unviable to maintain and gas or solid fuel fire appliances were in situ when the tenancy commenced, have been installed without PCHA's prior permission or no manufacturer's instructions are available for servicing purposes, PCHA will remove the appliance, cap off the supply and seal up the hearth space.

3.9.4 In all cases, PCHA will offer to install a radiator if none already exists, consider provision of an electric fire suite where gas or solid fuel fire appliances are removed as above (where the property has wet central heating systems).

3.10 **Potential Carbon Monoxide Poisoning**

3.10.1 In line with the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, PCHA have installed CO Detectors in any room with a gas appliance (except for kitchens where a gas cooker only is present) and will test these during the annual Gas Safety check programme.

3.10.2 In compliance with the British Standards (7967) guidance, if a Gas Safe registered engineer acting on PCHA's behalf or call handlers working in PCHA are contacted by a tenant reporting fumes, smells, spillage / leakage of gas combustion products or activation of Carbon Monoxide (CO) detectors, they will advise them to seek medical assistance immediately to verify if CO is the cause of their illness (and report the results back to PCHA at the earliest opportunity - PCHA will keep a record of the conversation with the tenant). Call handlers or engineers working on site will also transfer the call to Cadent (formerly the National Grid) who will arrange to make safe the gas supply as required.

3.10.3 PCHA employs an independent specialist contractor to conduct a full inspection of the installation to identify the cause of suspected Carbon Monoxide release. In compliance with the British Standard Guidance, PCHA will subsequently, raise an order for the gas supply to be reconnected and for CO detectors, appliances and flue to be checked (to British Standard 7697) and any remedial work to be carried out.

3.11 **Inspection of Flues in Void Spaces (behind walls or ceilings)**

3.11.1 In compliance with the Gas Safe Register Technical Bulletin 008, PCHA will ensure all Gas Safe registered engineers that carry out gas safety inspections on its behalf, can see the flue (which takes fumes away from an appliance) as part of their inspection. This will apply in all cases even where the flue may be concealed behind walls, ceilings or panelling (void spaces).

3.11.2 Where Gas Safe registered engineers cannot see flues to inspect them safely, they will classify appliances as 'At Risk' and will turn off boilers until such time as appropriate inspection hatches can be fitted to the property. Where this situation is likely to occur, PCHA will arrange for the supply of temporary heaters at the tenant's request or if adverse weather conditions are expected.

3.11.3 The construction date and type of PCHA domestic properties is such that flues concealed in void spaces are not a common occurrence, however, where they are in existence PCHA will install the necessary inspection hatches as the need for them is discovered via the annual safety inspections.

3.12 **Independent Checking of Gas Safety arrangements**

3.12.1 To seek assurances that the gas safety work PCHA commissions maintains the highest standards, PCHA require contractors carrying out this work on its behalf to quality check a percentage of its completed gas safety inspections on a risk-based approach. PCHA will also ensure a percentage of all completed gas safety inspections are quality checked via an independent external agency.

3.13 **Boiler Replacement Programme**

3.13.1 Future boiler replacements will be prioritised according to the PCHA Lifecycle projections, taking into account condition including an assessment of risk (on an individual basis) and availability of budget. Properties where tenants have refused Decent Homes works to be completed may also be prioritised when they become void (empty).

3.14 **Permission to Install Boilers and Heating Systems**

3.14.1 Where requests are received from customers to install or upgrade their own boilers or heating systems this will be dealt with under the 'Application to Alter' procedures (see PCHA Repairs and Maintenance Policy) for full details. In these circumstances will:

- Give the customer a realistic timescale of when their current system is due for a replacement under PCHA programmes to help them make informed choices
- Reserve the right to refuse the applications where proposed systems to be installed cannot be easily serviced or maintained

3.14.2 Where customers are granted permission to install their own systems, they may be entitled to compensation under the 'Right to compensation for improvement' regulations and subject to the depreciation formula, when the tenancy is terminated.

3.15 **Boiler Theft Action**

3.15.1 Where there are multiple thefts of boilers from the same residential property PCHA will consider, on a case-by-case basis, removing gas boilers and replacing them with a traditional tank and cylinder for water heating and convector space heaters (depending on the electrical load bearing capacity of the property) or more cost-effective boiler provision.

3.15.2 Where PCHA has just reason to suspect properties are abandoned, gas fired boilers will be fitted with additional security measures to prevent theft until abandonment procedures are complete or PCHA is satisfied that the tenant is occupying the property as per the terms of their tenancy agreement.

3.16 **No Gas Properties**

3.16.1 In addition to the duties to carry out annual safety checks of properties with a known gas supply under the Gas Safety (Installation and Use) Regulations, PCHA will also check properties where the asset management records indicate no gas supply exists, or it has previously been removed.

3.16.2 PCHA performs checks of 'no-gas' properties as a matter of good practice, rather than a legal obligation.

3.16.3 PCHA will make all reasonable endeavours to carry out checks on properties that are deemed higher risk of having a supply installed (without the tenant informing PCHA) on an annual cycle. If inspections indicate a supply has been installed in a property it will then be included on the register for annual checking.

3.16.4 This will include areas where suppliers are known to be active in carrying out installation works and properties where no inspection has taken place since the previous check.

3.16.5	Where other elements of PCHA’s asset management and checking regime ensure buildings are inspected more frequently and it is known that no gas supply exits, it will not be necessary to conduct ‘no gas’ inspections.
3.16.6	When carrying out ‘no-gas’ inspections PCHA will also ensure at least one smoke alarm is equipped on each storey of the property where there is a room used as living accommodation (i.e. in a standard two storey house, a smoke alarm should be fixed to the ceiling in the downstairs hallway and the upstairs landing).
4	Implementation
4.1	All PCHA staff have responsibility for ensuring gas safety for persons that use buildings it owns and or controls in line with general Health and Safety regulations. Whilst not all staff will have specific duties in regard to maintaining the LGSR, they will need to have an awareness of the Policy and supporting procedures to deal with any customer queries that may arise.
4.2	<p>The Building Safety and Compliance Manager and other staff with specific responsibility for overseeing day to day gas safety operations to ensure PCHA’s compliance with the requirements. The Building Safety and Compliance Manager will have specific responsibilities to:</p> <ul style="list-style-type: none"> • Ensure the procurement process for any contractors employed by PCHA for any installation, maintenance or gas safety testing works reach the standards required by the Gas Safe Register
4.3	The Health and Safety Team will be responsible for any investigations following any confirmed major incidents involving gas escape from PCHA premises or suspected CO poisoning including liaising with gas suppliers, emergency services and the Health and Safety Executive as required.
5	Performance
5.1	<p>PCHA measures performance on all aspects of gas safety management through a comprehensive set of key performance indicators including:</p> <ul style="list-style-type: none"> • Percentage of properties with a current LGSR in place • Percentage of tenants satisfied with annual gas safety check • Percentage of tenants satisfied with gas repairs
5.2	PCHA collates the above performance information and provides reports to customers including benchmark information comparing performance to other housing providers on a quarterly basis.
6	Consultation
6.1	All PCHA staff have been consulted in the development of the Policy and specific input of technical advice has been sought from those staff with operational knowledge of gas safety

	management. The PCHA Customer Empowerment Panel have also been consulted about the development of this Policy.		
7	Review		
7.1	The Policy will be reviewed at least once every Three Years from the date of approval to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on the obligations of PCHA.		
8	Equality Impact Assessment		
8.1	Was a full Equality Impact Assessment (EIA) required?	No	
8.2	When was EIA conducted and by who?	An EIA Relevance Test was conducted by the Policy and Strategy Manager and the Quality and Inclusion Officer in January 2024.	
8.3	Results of EIA	Although, the EIA scored highly in terms of potential risks to the business and individuals there were no adverse impacts for any group with protected characteristics. Any differential impacts identified were adequately mitigated by existing procedures and operational practice (e.g. additional support for tenants with known mental health issues, when arranging LGSR checks).	
9	Scheme of Delegation		
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	Departmental Management Team	
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Director of Operations	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Director of Operations	
10	Amendment Log		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
12 th April 2022	In line with the Review Schedule	See Section 6	<ul style="list-style-type: none"> Change at 3.3.1 - inclusion of an 'MOT-style' approach to the annual gas inspection as per the Gas Safety (Installation and Use) (Amendment) Regulations 2018

			<ul style="list-style-type: none"> ● Change at 1.6- included the following: <ul style="list-style-type: none"> ○ Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) ○ Housing Acts 2004 ● Change 3.13.1- Removal of statement related to Decent Homes Standard
14 th December 2022.	In line with the Review Schedule	See Section 6	<ul style="list-style-type: none"> ● Change at 3.9.1- Reworded the section to read If during the annual gas safety check or attendance to a repair it is found that a flue, chimney or associated heating appliance is defective and uneconomical to repair then PCHA will look to remove the appliance and close up any openings to the flue or chimney
22 nd January 2024	In line with the Review Schedule	See Section 6	<ul style="list-style-type: none"> ● Relevant legislation and regulatory standards have been updated throughout ● Numbering has been revised throughout ● The EIA Relevance Test has been updated ● In line with Board approved process the review period for this Policy will now be every Three years rather than annually