

1. Background and objectives

- 1.1. Alliance is responsible for the maintenance and repairs to its homes and other buildings, many of which will contain gas and heating installations and appliances. The Gas (Installation and Use) Regulations 1998 specifically deal with the installation, maintenance and use of gas appliances, fittings and flues in domestic properties and certain commercial premises. The regulations also place a legal duty on landlords to ensure that gas appliances, fittings and flues provided for customers' use are safe.
- 1.2. Alliance is also responsible for maintaining other types of heating systems to ensure that all appliances, fittings and flues provided for customers' use are safe. These include gas, communal heating plant, ground air source heat pump (ASHP), oil fired, solid fuel, gas absorption heat pump and other types of heating systems.
- 1.3. Alliance must establish a policy which meets the requirements of the Gas Safety (Installation and Use) Regulations 1998. In addition to this, the policy must provide assurance to Alliance that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with gas fittings, appliances and flues.
- 1.4. Alliance must ensure compliance with gas safety legislation is formally reported at SLT and Board level, including the details of any non-compliance and planned corrective actions.
- 1.5. This policy is relevant to all Alliance colleagues, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 1.6. It should be used by all to ensure they understand the obligations placed upon Alliance to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties (owned and managed).

2. Policy detail

2.1. Regulatory Standards, Legislation and Codes of Practice

2.1.1. Regulatory Standards – the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH).



- 2.1.2. Legislation the principal legislation applicable to this policy is 'The Gas Safety (Installation and Use) Regulations 1998 (as amended). Alliance has a legal obligation under Part F, Regulation 36 of the legislation (Duties of Landlords) and is the 'Landlord' for the purposes of the legislation. Alliance is the 'Landlord' by virtue of the fact that tenancy, lease and licence agreement obligations is has with customers.
- 2.1.3. <u>Code of Practice</u> the principal approved codes of practice applicable to this policy are as follows
 - ACoP L56 'Safety in the installation and use of gas systems and appliances (4th edition 2013)
 - INDG285 'A guide to landlords' duties: Gas Safety (Installation and Use) Regulations 1998 as amended by the Gas Safety (Installation and Use) (amendment) Regulations 2018.
- 2.1.4. Oil Fired whilst there is no legal requirement in UK for a landlord to obtain a landlord safety certificate for oil fired equipment installed in a property, landlords should ensure that oil fired appliances installed in their properties are adequately and regularly serviced and maintained and flues are operating safely.
- 2.1.5. Sanctions Alliance acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.
- 2.1.6. <u>Customers</u> Alliance will use the legal remedies available within the terms of the tenancy agreement, lease or license should any customer refuse access to carry out essential gas safety checks, maintenance and safety related repair works.
 - <u>Non-Access:</u> We will agree an appointment with the customer to carry out
 the inspections or works. If the customer is not available, on the day, or
 refuses access, we will agree a second appointment. If this second
 appointment is not kept a 'no access' process will be initiated, which may
 result in legal action being taken to gain access.

2.2. Additional legislation

- 2.2.1. This gas and heating safety policy also operates in the context of the following legislation:
 - Health and Safety at Work Act 1974
 - The Management of Health and Safety at Work Regulations 1999
 - The Workplace (Health Safety & Welfare) Regulations 1992



- Gas Safety (Management) Regulations 1996 (as amended)
- The Building Regulations in England & Wales
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- Pressure Equipment Regulations 1999
- Pressure Systems Safety Regulations 2000
- Pipelines Safety Regulations 1996
- Heat Network Regulations 2014
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Construction, Design and Management Regulations 2015
- Landlord and Customer Act 1985
- Data Protection Act 2018
- RIDDOR 2013
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022.

2.3. Obligations

- 2.3.1. The Gas Safety (Installation and Use) Regulations 1998 impose duties on landlords to protect customers' safety in their homes with respect to gas safety. The main duties as a landlord are set out in Regulation 36 requiring landlords to:
 - Ensure gas fittings and flues are maintained in a safe condition. Gas appliances should be serviced in accordance with the manufacturer's instructions. If these are not available, it is recommended that they are serviced annually unless advised otherwise by a Gas Safe registered engineer
 - Ensure the annual safety check is carried out on each gas appliance and flue within 12 months of the anniversary date
 - Have all installation, maintenance and safety checks carried out by a Gas Safe registered engineer
 - Keep a record of each safety check for at least 2 (two) years
 - Issue a copy of the latest safety check record to existing customer within 28 days of the check being completed, or to any new customer when they move in
 - Display a copy of the latest safety check record in a common area of a building where the gas appliance serves a communal heating system to multiple homes.



- 2.3.2. In addition, landlords must ensure that no gas fitting of a type that would contravene Regulation 30 (e.g., certain gas fires and instantaneous water heaters) is fitted in any room occupied or to be occupied as sleeping accommodation after the Regulations came into force. This includes any room converted into such accommodation after that time.
- 2.3.3. These obligations apply to both gas heating and LPG heating systems.
- 2.3.4. Other heating types with regards to all other heating types as set out in 1.2 of this policy, although there is no legal requirement for carrying out safety checks, Alliance will complete an annual safety check (to include tanks, pipework and bund) for all properties with these heating types, in exactly the same way as they do for properties with gas and LPG. The competent person will require alternative qualifications which are set out in section 2.9 of this policy.

2.4. Statement of intent

- 2.4.1. Alliance acknowledges and accepts its responsibilities under the Gas Safety (Installation and Use) Regulations 1998.
- 2.4.2. Alliance will hold accurate inspection dates and inspection records against each property it owns or manages within 'Total'.
- 2.4.3. This is until such time that all property compliance data can be held in one system, setting out the requirements for gas and heating safety checks and servicing of all gas and other heating fittings, appliances and flues.
- 2.4.4. Alliance will ensure the gas/heating contractor visits all properties on an annual basis to carry out gas and/or heating safety checks (HSI), irrespective of whether the property has a gas supply or not. These properties will be subject to sections 2.5.3 of this policy irrespective of whether they have a gas supply or not.
- 2.4.5. Alliance will ensure that each property requiring a gas/heating safety check and/or service will have a landlords' gas safety record (LGSR) or equivalent that has a completion date not more than 12 months following the previous anniversary date relating to the property or installation date of new installations.
- 2.4.6. Alliance will ensure that copies of all LGSRs/certification are provided to customers within 28 days of completion or displayed in a common area where necessary upon completion of the service within 28 days of its completion.
- 2.4.7. Alliance will periodically (and at least annually) undertake an asset data review to ensure adequate assurance is provided that gas safety data held against the organisation's property assets is accurate and up to date.
- 2.4.8. Alliance will cap off gas supplies to all properties when the property becomes empty (void), and a new customer is not moving in immediately following the previous customer leaving. This will be completed by the end of the next working day.



- 2.4.9. Alliance will cap off gas supplies to all new build properties at handover if the new tenancy is not commencing immediately at the point of handover.
- 2.4.10. Alliance will ensure that gas safety checks are carried out prior to, or immediately following the commencement of any new tenancy (void or new build properties), mutual exchange and/or transfer and that the customer receives a copy of the LGSR prior to, or immediately after moving in.
- 2.4.11. Alliance will cap off gas supplies where it is not possible to complete an LGSR due to a debt on the meter. Before capping Alliance will consider if the debt can be cleared, and whether this debt should then be recovered from the customer.
- 2.4.12. Alliance will carry out a gas safety check following any new gas appliance installation. The safety check will include a gas soundness test of the system pipework, a visual inspection of the meter installation and a visual inspection including the safe working operation on all other gas appliances and associated flues within a property, issuing a gas safety certificate to confirm the necessary checks have been completed.
- 2.4.13. Alliance will carry out a visual check of customer owned appliances. This includes a 5 point visual safety check for gas cookers and gas fires where the manufacturers' instructions are available (Location, flueing, ventilation, signs of distress and stable and secure). Where appliances are found to be faulty these will be disconnected, labelled and a written warning notice issued.
- 2.4.14. Alliance will test all smoke alarms and carbon monoxide alarms as part of the annual gas safety check or HSI (for non-gas properties) visit (or at void stage). In the event that the hard-wired smoke alarm is broken at the time of the gas safety check, a battery-operated smoke alarm will be installed as an interim measure.
- 2.4.15. Alliance will carry out an annual gas safety check to all properties where the gas supply is inactive (capped). This is to ensure that gas supplies have not been reconnected by the customer and to understand the customer's circumstances and property condition to ensure there is no detriment to the customer/property associated with the capping. Section 2.5.3 of this policy will apply to these properties.
- 2.4.16. Alliance will ensure that only suitably competent Gas Safe accredited engineers undertake gas, or LPG works for the organisation. See section 2.9 of this policy for the competency required to carry out safety checks for other heating types.
- 2.4.17. Alliance will not grant permission to customers to install solid fuel appliances in their homes. In addition, Alliance will remove any solid fuel appliances at void stage and seek to phase out their use within the stock portfolio due to the increased risks these systems pose.
- 2.4.18. Alliance will remove any open flue gas appliances found in any rooms that are designated as bedrooms.



- 2.4.19. Alliance will have a robust process in place to gain access should any customer refuse access to carry out essential gas/heating safety related inspection and remediation works.
- 2.4.20. Alliance will have a robust process in place to gain access to properties where customer vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the customer.
- 2.4.21. Alliance will establish and maintain a plan of all continuous improvement activity undertaken with regards to gas/heating safety.
- 2.4.22. Alliance will ensure that where applicable all solid fuel, chimney stacks, oil fired appliances and flues are inspected and maintained at least annually and that this work is completed by a suitably competent engineer. The service inspection will include pipework, tanks and bunds etc.
- 2.4.23. Alliance will ensure that, during any relevant inspection/service, a carbon monoxide alarm is installed and operational in any room which is used wholly or partly as living accommodation and contains a fixed combustion appliance (except gas cookers). Where alarm is not already in place, one will be installed.

2.5. Compliance risk assessment / inspection programmes

- 2.5.1. Risk assessment Alliance will establish and maintain a risk assessment for gas and heating safety management and operations. This risk assessment will set out the organisations' key gas and heating safety risks together with appropriate mitigations.
- 2.5.2. <u>CDM -</u> to comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be completed for all void works (at the start of the contract and reviewed annually thereafter), component replacement works and refurbishment projects. This plan will detail any gas and heating installations that may be affected by the works and detail all necessary gas work required to make safe and reinstate gas installations, including the requirement for a new gas safety check, maintenance service and LGSR.
- 2.5.3. <u>Domestic properties</u> Alliance will carry out a programme of annual gas and heating safety checks and services to all domestic properties, covering all heating types. This check will include all gas/heating fittings, appliances and flues in the property and will be completed 12 months from the date of the previous LGSR/certification. This safety check is driven from the anniversary date of the most recent LGSR/certification which may have been carried out at the start of a new tenancy or following installation of new gas appliances.



- 2.5.4. Alliance will continue to operate under the current legislative regime but seek to gain the benefits of the new changes introduced in April 2018 to Part F, Regulation 36 (3) of the Gas (Installation and Use) Regulations 1998 that provides landlords with some flexibility around the anniversary date of LGSRs. The new change allows the landlord to carry out a new gas safety check within 10 months and 1 day of the previous safety check and retain the original 12 month anniversary date of the previous LGSR, providing it does not exceed this 12 month anniversary date.
- 2.5.5. Communal Blocks and 'Other' properties Alliance will carry out a programme of annual gas and heating safety checks and services to all 'communal blocks' and 'other' properties (shops, offices, depots, commercial leasehold, etc.), where it has the legal obligation to do so. These checks will include all gas and heating fittings, appliances and flues in the property and will be completed no longer than 12 months from the date of the previous LGSR/certification or as detailed within manufacturer's instructions. These safety checks and maintenance services will be carried out by a suitably competent engineer in accordance with the manufacturer's instructions. These installations may include catering equipment, boilers serving communal heating systems, combined heat and power systems, pressure vessels and water heating boilers.
- 2.5.6. Alliance will carry out where applicable a programme of annual safety checks and services to all oil fired and solid fuel systems. This check will include all fittings, appliances and flues in the property and will be completed no longer than 12 months from the date of the previous safety check and service or as detailed within manufacturer's instructions or industry best practice. These safety checks and maintenance services will be carried out by a suitably competent engineer in accordance with the manufacturer's instructions.

2.6. Compliance follow up work

- 2.6.1. Alliance will ensure there is a robust process in place for the management of any follow-up works required following the completion of a gas/heating safety check.
- 2.6.2. Alliance will ensure that there is a robust process in place to collate and store all warning notices and associated records of completed remedial works.
- 2.6.3. A safety check will be carried out on completion of any repair and/or refurbishment works to occupied or void properties where works may have affected any gas fittings, appliances or flues.
- 2.6.4. Alliance will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued with regard to gas and heating safety.
- 2.6.5. Where defects are found relating to smoke or CO detectors, which cannot be immediately rectified, a remedial action will be raised. This work will be assigned a priority of P1, for rectification within 24 hours.



2.7. Record keeping

- 2.7.1. Alliance will establish and maintain a core asset register of all properties that have an active or inactive gas supply. This register will also hold data against each property asset of gas or other heating inspection and servicing requirements, where applicable, for all domestic properties, communal blocks and 'other' property assets.
- 2.7.2. Alliance will hold accurate inspection dates and inspection records against each property it owns or manages as follows:
- 2.7.3. Inspection dates and re-inspection records will be held within 'Total'.
- 2.7.4. Alliance will ensure the Gas Safe registered engineer records the details of all appliances and other equipment which is served by the gas/heating supply in every domestic property, communal block or 'other' property.
- 2.7.5. Alliance will establish and maintain accurate records of all completed safety records (LGSR, HIS, Smoke, CO, etc), warning notices and associated remedial works and keep these for a period of not less than 2 (two) years.
- 2.7.6. Alliance will hold and maintain accurate records on the qualifications of all engineers undertaking gas/heating works for the organisation. These will be checked and evidenced accordingly on an annual basis.
- 2.7.7. Alliance will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all gas/heating safety related data.

2.8. Key roles and responsibilities

- 2.8.1. The Alliance Board will have overall governance responsibility for ensuring the Gas and Heating Safety Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such the Board will formally approve this policy and review it every 3 (three) years (or sooner if there is a change in regulation, legislation or approved codes of practice).
- 2.8.2. The Board will receive quarterly updates on the implementation of the Gas and Heating Safety Policy and gas safety performance along with notification of any non- compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.
- 2.8.3. The SLT will receive reports (from the Landlord Safety Compliance Group) in respect of gas safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.



- 2.8.4. The Director of Customer Service has strategic responsibility for the management of gas safety and ensuring compliance is achieved and maintained. The Head of Customer Safety will oversee the implementation of the Gas and Heating Safety Policy.
- 2.8.5. The Head of Customer Safety will be responsible for overseeing the delivery of the agreed gas and heating safety programme and are also responsible for the prioritisation and implementation of any works arising from the gas and heating safety inspections.
- 2.8.6. Additional colleagues from relevant teams will provide key support in gaining access into properties where access is proving difficult and use standards methods to do so. They will also facilitate the controlled access or legal process to gain access as necessary.

2.9. Competent Persons

- 2.9.1. Alliance will ensure that the manager with lead responsibility for operational delivery is appropriately qualified; holding a recognised gas safety management qualification. They should have or be working towards gaining the CORGI Level 4 VRQ in Gas Safety Management (if they are not Gas Safe Registered) and full membership of the Association of Gas Safety Managers (AGSM). If they do not have these already, they should obtain them within 12 months of the approval of this policy.
- 2.9.2. Alliance will ensure that all operatives (internal or employed by external contractors) maintain Gas Safe accreditation for all areas of gas/LPG works that they undertake.
- 2.9.3. Alliance will ensure that only suitably competent Gas Safe accredited contractors are procured and appointed to undertake works to gas/LPG fittings, appliances and flues.
- 2.9.4. Alliance will ensure that where applicable, only suitably competent Oil Firing Technical Association (OFTEC) and/or HETAS accredited contractors are procured and appointed to undertake works to oil fired and solid fuel fittings, appliances and flues. HETAS is a not-for-profit organisation offering competent person scheme for installers of biomass and solid fuel heating, registration for retailers and chimney sweeps and approval of appliances and fuels.
- 2.9.5. Other heating types Alliance will ensure that where applicable, only individuals/organisations with a Micro generation Certification (MCS) are procured and appointed to undertake works on ground air source heat pumps, solar thermal and biomass heating systems.



2.9.6. The operational team with responsibility for delivery will check the relevant qualifications of in-house operatives or employees working for these contractors to ensure that all persons are appropriately qualified and accredited for the work that they are carrying out. These checks will be undertaken on an annual basis and evidenced appropriately.

2.10. Training

- 2.10.1. This policy and the procedures that support it will be subject to a range of training across Alliance and will involve all relevant stakeholders. The training will be bespoke to the individual stakeholders and refresher training will be provided as appropriate.
- 2.10.2. Training will include team briefings for those employees who need to have a basic understanding and awareness of gas/heating safety but who may not be actively involved in the delivery of the gas and heating safety policy. This will be basic gas and heating safety awareness training.
- 2.10.3. On the job training will be provided to those employees who will be responsible for managing the programme of gas/heating safety checks and repair works to gas and other heating fittings, appliances and flues as part of their daily job.
- 2.10.4. Regular toolbox talks (quarterly) will be given to operatives in the form of appropriate gas/heating safety training. Alliances' partner contractors will be expected to do this with their operatives and evidence this to the Head of Customer Experience (Home Repairs Service) on an annual basis.
- 2.10.5. Monthly meetings will be held with those involved in the management and monitoring of performance in relation to gas/heating safety, to brief on the current position and update and review the programme.

2.11. Performance Reporting

- 2.11.1. Robust key performance indicator (KPI) measures will be established and maintained to ensure Alliance is able to report on performance in relation to gas and heating safety.
- 2.11.2. KPI measures will be produced and provided to the Landlord Safety Compliance Group on a bi-monthly basis and Board level on a quarterly basis. As a minimum, these KPI measures will include reporting on:

Data – the total number of:

- Properties split by domestic properties, communal blocks and 'other' properties
- Properties on the gas/heating servicing programme (separated by gas, oil and solid fuel)



- Properties with a valid 'in date' LGSR/certification. This is the level of compliance expressed as a number and a %
- Properties where the LGSR/certification has expired and is 'out of date'.
 This is the level of non-compliance expressed as a number and a %
- Properties which are due to be serviced within the next 30 days. This is the early warning system for the operational teams

Narrative - an explanation of the:

- Current position
- Corrective action required
- Anticipated impact of corrective action
- Progress with completion of follow-up works
- 2.11.3. In addition to the metrics for heating installations, listed above, the same metrics will be reported for Smoke and CO detectors.
- 2.11.4. Alliance will carry out independent third-party quality assurance audits of gas and heating safety checks, gas appliance services and gas appliance repair works as required by the Alliance gas safety compliance risk assessment. Best practice suggests this should be a 10% sample of the total gas and heating safety works carried out.
- 2.11.5. In addition, 100% of all LGSRs/certification will be checked by Alliance colleagues.
- 2.11.6. Alliance will carry out an independent external audit of gas and heating safety at least once every 2 years. This audit will specifically test for compliance with the regulation, legislation and approved codes of practice and identify any non-compliance issues for correction.

2.12. Non-compliance / escalation process

- 2.12.1. Any non-compliance issue identified at an operational level will be formally reported to the Head of Customer Safety in the first instance.
- 2.12.2. The Head of Customer Safety will agree an appropriate course of corrective action with the Director of Customer Services in order to address the non-compliance issue and the Director of Customer Services will report details of the same to SLT.
- 2.12.3. The Director of Business Services and the Landlord Safety Compliance Group will provide 'independent' oversight of the programme delivered by Home Repairs Service.
- 2.12.4. The Director of Business Services will ensure the Board is made aware of any non-compliance issue so they can consider the implications and take action as appropriate.



2.12.5. In cases of a serious non-compliance issue SLT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation as part of the Regulatory Framework.

3. Equality and diversity

- 3.1. This policy is subject to a periodic Equality Impact Assessment (EIA).
- 3.2. The purpose of such an assessment is to consider the effect of the policy regarding the recognised protected characteristics of equality and ensure that it does not unfairly impact any individual or group. The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity or other grounds set out in our Equality and Diversity Strategy and Policy. Remedial action will be undertaken if a detrimental effect is identified.
- 3.3. The EIA also requires the policy author to consider whether the policy is likely to negatively impact on a person's Human Rights.
- 3.4. This policy and any other related Alliance Homes publications can be provided in other formats for those with visual, literacy or language difficulties.

4. Complaints

- 4.1. If you would like to raise a complaint in relation to this policy, you can do this by calling us on **03000 120 120** or emailing us at act@alliancehomes.org.uk.
- 4.2. All complaints will be handled in line with the latest Alliance Homes Complaint Handling Policy.

5. Associated documents

- 5.1. For further information see in particular:
 - No Access Procedure
 - Court Injunction Procedure
 - Onboarding New Properties Procedure (under development).



6. Version control and approval dates

Approval stage	Date completed
Equality Impact Assessment completed	27/06/2023
EIA reviewed by specialist colleague within HR	09/10/2023
SLT review	18/10/2023
Asset Committee review	31/10/2023
Board approval	22/11/2023
Next review date	22/11/2026

Minor amends:

- Feb 2024 New clause added (2.6.5).
- **Jun 2025** New standard section on complaints added, standard non-access paragraph added and reformatted for external publication.

7. Appendices

Appendix 1 - Equality Impact Assessment



Appendix 1

Equality Impact Assessment

An Equalities Impact Assessment must be conducted alongside the review of an existing policy or the creation of a new one.

1. Name the Strategy, Policy, Procedure or Function (SPPF) being assessed and name of author.

Gas and Heating Policy

- 2. Aims of the SPPF being assessed.
 - Whose need is it designed to meet?
 - Are there any measurable elements such as time limits or age limits?

The aim of this policy is to safeguard customers and colleagues and to ensure compliance with legislation, regulation and guidance.

- 3. Who has been consulted in developing the SPPF?
 - Make reference or links to consultation/evidence documents

The members of the Landlord Safety Compliance Group

4. Does the SPPF promote equality of opportunity?

The policy has neither a positive or negative impact on the protected characteristics as shown below, but rather ensures that all customers gas and heating is dealt with in a manner compliant with the relevant legislation, regulation and guidance.

- 5. Identify potential impact on each of the diversity "groups" by considering the following questions (the list is not exhaustive but an indication of the sort of questions assessors should think about):
 - Might some groups find it harder to access the service?



- Do some groups have particular needs that are not well met by the current SPPF?
- What evidence do you have for your judgement (e.g. monitoring data, information from consultation/research/feedback)?
- Have staff/residents raised concerns/complaints?
- Is there local or national research to suggest there could be a problem?

Protected Characteristic	No impact	Negative	Positive	Information source/s **	Comments/evidence
Race	X				
Disability	X				
Gender	X				
Transgender	X				
Sexual orientation	X				
Religion or belief	X				
Age	X				
Marriage & Civil Partnership	X				
Pregnancy and Maternity	X				
Rural issue	х				



Social mobility	х				
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Was there a negative impact identified in question 5? If yes go to question 6. if not go to question 7.

6. If "negative impact" identified in table (4) above is it?

Legal -	YES	NO
What is the level of impact? -	HIGH	LOW

If it is <u>not</u> legal and/or <u>high</u> impact – (i.e.: if you have highlighted NO to legal and HIGH to impact, then the document <u>should be referred to Head of HR)</u>

7. If positive impact has been identified in table 4 above, how can it be improved upon or maximised, either in this SPPF or others?

The policy aims to ensure a consistent and fair approach is taken in all cases regardless of protected characteristic.

- 8. Full EIA (or if you decide full EIA is not necessary but some changes should be considered)
 - Are there changes you could introduce which would make this SPPF work better for this group of people?
 - Is further research or consultation required?
- 8. Does this proposal have any potential Human Rights implications?

If yes, please describe (if necessary, please refer to the Alliance Homes Group Human Rights Policy)

No.		