

SP23 Gas Safety Policy

1. Purpose

The purpose of this Policy is to establish Soha Housing's commitment to the safe management of gas installations, appliances, flues and associated equipment across its property portfolio.

Soha recognises that effective gas safety management is fundamental to protecting residents, employees, contractors and others from the risks associated with natural gas, Liquefied Petroleum Gas (LPG), solid fuel, oil-fired heating systems and other combustion appliances.

This Policy provides the strategic framework for ensuring compliance with all applicable legislation, regulatory requirements and recognised industry best practice. It supports Soha's wider Building Safety responsibilities by defining the organisation's commitment to:

- Protecting residents, employees, contractors and visitors from gas-related risks.
- Maintaining full compliance with all relevant gas safety legislation.
- Ensuring gas appliances, flues and associated systems are inspected, serviced and maintained by competent persons.
- Managing carbon monoxide risks through the installation, inspection and maintenance of carbon monoxide alarms.
- Maintaining accurate records that form part of the Building Safety Golden Thread.
- Delivering continual improvement through effective governance, assurance and performance monitoring.
- Supporting a positive safety culture across all housing assets.

This Policy is supported by the Gas Safety Procedure, which details the operational arrangements for achieving these objectives.

2. Scope

This Policy applies to all domestic properties, communal areas and relevant non-domestic premises owned or managed by Soha Housing where the organisation has responsibility for gas safety.

The Policy applies to:

- Natural gas installations.
- Liquefied Petroleum Gas (LPG) installations.
- Gas appliances.
- Gas pipework.
- Flues and associated ventilation systems.
- Carbon monoxide alarms.
- Solid fuel heating systems.
- Oil-fired heating systems.
- Air Source Heat Pumps (where servicing forms part of Soha's maintenance responsibilities).

The Policy applies to:

- Employees.
- Managers.
- Directors.
- Contractors.
- Gas Safe registered engineers.
- Consultants.
- Any organisation undertaking gas-related work on behalf of Soha.

This Policy applies throughout the lifecycle of gas assets, including:

- Design and specification.
- Installation.
- Commissioning.
- Inspection and testing.
- Routine servicing.
- Responsive repairs.
- Planned maintenance.
- Component replacement.
- Emergency response.
- Decommissioning and removal.

This Policy does not apply to gas appliances or installations for which Soha has no legal repairing responsibility, including those owned and maintained by leaseholders or shared ownership residents, unless specific contractual arrangements state otherwise.

3. Legislative Framework

Soha Housing will manage gas safety in accordance with all relevant legislation, approved codes of practice and recognised industry guidance.

This includes, but is not limited to:

Primary Legislation

- Health and Safety at Work etc. Act 1974
- Gas Safety (Installation and Use) Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Building Safety Act 2022
- Regulatory Reform (Fire Safety) Order 2005 (where applicable)
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Housing Act 2004
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- Construction (Design and Management) Regulations 2015
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Approved Codes of Practice & Guidance

- HSE Approved Code of Practice L56 – Safety in the Installation and Use of Gas Systems and Appliances

- Gas Safe Register Technical Bulletins
- IGEM Standards and Guidance
- HSE Gas Safety Guidance
- Building Safety Regulator Guidance

Regulatory Requirements

- Regulator of Social Housing – Safety and Quality Consumer Standard
- Building Safety Act 2022
- Consumer Standards Framework

Soha Housing Documents

This procedure should be read in conjunction with:

- SP40 Lift Safety Policy
- SP30 Health and Safety Policy
- SP60 Asset Management Strategy
- SP52 Reasonable Adjustments for Residents Policy
- HS06 Accident Incident & Near Miss Procedure
- SP31 Fire Safety Policy
- SP01 Equality, Diversity and Inclusion Policy
- HS10 Lone Worker Procedure
- SP05 Repairs & Maintenance
- SP39 Electrical Safety

4. Policy Statement

Soha Housing recognises that the effective management of gas safety is critical to protecting residents, employees, contractors and visitors from the potentially serious consequences of gas leaks, fire, explosion and carbon monoxide poisoning.

The organisation is committed to maintaining a safe living environment by ensuring that all gas installations, appliances, flues and associated equipment for which it is responsible are managed in accordance with statutory requirements, recognised industry standards and best practice.

To achieve this, Soha Housing will:

- Ensure compliance with all applicable gas safety legislation, regulations and Approved Codes of Practice.
- Ensure all gas servicing, inspections, testing, repairs and installations are undertaken by competent Gas Safe registered engineers.
- Maintain 100% compliance with statutory Landlord Gas Safety Record (LGSR) requirements.
- Ensure carbon monoxide alarms are installed, inspected, tested and maintained in accordance with legislative requirements.
- Operate a robust inspection, servicing and maintenance programme based on risk and statutory timescales.
- Maintain accurate records that contribute to the Building Safety Golden Thread.
- Ensure effective management of contractors undertaking gas-related work.
- Provide appropriate governance, assurance and performance monitoring arrangements.

- Promote continual improvement through audits, inspections, incident investigations and lessons learned.
- Ensure residents receive appropriate information regarding gas safety and understand their responsibilities in providing access for statutory inspections and servicing.
- Operate a planned programme for the installation, inspection, testing, replacement and maintenance of carbon monoxide alarms in accordance with legislative requirements and recognised industry guidance.
- Ensure all carbon monoxide alarm inspections, testing, maintenance and replacement activities are accurately recorded and routinely monitored to demonstrate compliance.
- Maintain clear arrangements for the safe isolation and capping of gas supplies where appliances or installations are unsafe, no longer required or properties become vacant, ensuring that residents continue to receive appropriate heating and hot water wherever reasonably practicable.

Where access to properties cannot be obtained, Soha will adopt a proportionate and robust approach to securing access in accordance with its Gas Safety Procedure and legal obligations.

Gas safety shall remain a corporate priority and will be supported by appropriate resources, competent personnel and effective leadership throughout the organisation.

5. Roles & Responsibilities

5.1 Board

The Board is responsible for:

- Providing strategic oversight of gas safety compliance.
- Seeking assurance that statutory obligations are being met.
- Monitoring organisational performance and compliance.
- Receiving assurance reports regarding significant compliance risks.

5.2 Chief Executive

The Chief Executive has overall accountability for ensuring Soha maintains appropriate arrangements to comply with statutory gas safety duties.

5.3 Director of Property Services (Duty Holder)

The Director of Property Services is the Duty Holder for Gas Safety and is responsible for:

- Providing strategic leadership.
- Ensuring adequate resources are available.
- Ensuring effective governance arrangements.
- Escalating significant risks to the Senior Leadership Team and Board.
- Approving strategic investment in gas safety compliance.

5.4 Head of Asset Compliance (Responsible Person)

The Head of Asset Compliance is responsible for:

- Implementing this Policy.
- Delivering the Gas Safety Procedure.
- Managing statutory servicing programmes.

- Maintaining compliance records.
- Managing contractor performance.
- Monitoring gas safety KPIs.
- Reporting compliance performance.

5.5 Head of Health & Safety

The Head of Health & Safety shall:

- Provide competent health and safety advice.
- Monitor legislative compliance.
- Undertake independent compliance audits.
- Investigate gas-related incidents where appropriate.
- Provide assurance to senior management.
- Monitor emerging legislation and industry best practice.

5.6 Managers

Managers shall:

- Ensure statutory inspections are completed.
- Monitor contractor performance.
- Escalate compliance concerns.
- Support access arrangements.
- Ensure risks are appropriately managed.

5.7 Employees

Employees shall:

- Comply with this Policy and associated procedures.
- Report defects or suspected gas hazards immediately.
- Complete mandatory training appropriate to their role.
- Cooperate with investigations and audits.

5.8 Contractors

Contractors shall:

- Hold current Gas Safe Registration where required.
- Work in accordance with legislation and Soha procedures.
- Maintain competence.
- Report defects immediately.
- Maintain accurate records.
- Cooperate with quality assurance inspections.

6. Operational Arrangements

Operational arrangements for managing gas safety are detailed within the Gas Safety Procedure.

These arrangements include, but are not limited to:

Carbon Monoxide Alarm Management

Operational arrangements shall include:

- Installation programme.
- Statutory installation requirements.
- Inspection and testing frequencies.
- Planned replacement programme.
- Repairs following reported defects.
- Allocation of responsibilities.
- Performance monitoring.
- Record management.

Gas Capping Arrangements

Operational arrangements shall include:

- Circumstances requiring gas capping.
- Authorisation requirements.
- Competent persons.
- Resident communication.
- Temporary and permanent capping.
- Annual safety inspections.
- Record keeping.
- Reinstatement procedures.
- Provision of temporary heating and hot water where appropriate.

The Gas Safety Procedure establishes the operational controls necessary to ensure compliance with statutory duties and effective management of gas-related risks throughout Soha's housing portfolio.

7. Resident Engagement

Soha Housing recognises that effective resident engagement is fundamental to the successful management of gas safety and maintaining safe homes.

Residents play an important role by allowing access for statutory inspections, reporting faults promptly and following gas safety advice provided by Soha.

Soha Housing recognises that some residents may require additional support to ensure they are not disadvantaged during the delivery of statutory compliance activities. Vulnerability may arise from age, disability, physical or mental health conditions, learning disabilities, sensory impairment, language or communication barriers, safeguarding concerns or other personal circumstances.

Where a resident is identified as vulnerable, Soha will take a person-centred approach to assessing their individual needs and, where reasonably practicable, implement appropriate support and reasonable adjustments to enable compliance activities to be undertaken safely and effectively. This may include adapting communication methods, offering flexible appointments, arranging joint visits with Housing colleagues, involving carers or advocates where appropriate, or providing additional support before, during and after works.

Employees and contractors undertaking work on behalf of Soha are responsible for recognising potential vulnerabilities, recording relevant information in accordance with Soha's procedures and escalating any concerns to the appropriate manager where additional support or safeguarding intervention may be required.

The management of vulnerable residents shall be integrated into planning, risk assessment, resident engagement and service delivery to ensure statutory obligations are met while maintaining the safety, dignity and wellbeing of residents.

To support this, Soha will:

- Provide clear, accurate and timely information regarding gas safety responsibilities.
- Promote awareness of the importance of annual gas safety inspections and servicing.
- Encourage residents to report gas leaks, faults, damaged appliances or carbon monoxide alarm defects immediately.
- Provide accessible communication tailored to individual resident needs, including reasonable adjustments where appropriate.
- Work collaboratively with residents to arrange convenient appointments for statutory servicing and maintenance.
- Support vulnerable residents through joint working with Housing Management teams and partner agencies where additional assistance is required.
- Consult residents where appropriate regarding changes to gas safety services and seek feedback to support continual service improvement.

Where access is repeatedly refused, Soha will work proactively with residents to secure access and, where necessary, will take appropriate legal action to ensure statutory gas safety duties are fulfilled.

Resident engagement activities shall support compliance with the Safety and Quality Consumer Standard and contribute to maintaining safe homes for all residents.

8. Performance & Assurance

8.1 Performance Monitoring

Soha Housing will monitor gas safety compliance through a comprehensive performance management framework to ensure statutory obligations are consistently achieved and risks are effectively managed.

Key Performance Indicators (KPIs) may include:

- Percentage of Landlord Gas Safety Records (LGSRs) completed within statutory timescales.
- Percentage of properties with valid gas safety certification.
- Percentage of annual servicing completed within programme.
- Number of overdue gas safety inspections.
- Percentage of carbon monoxide alarms inspected and operational.
- Number of emergency gas incidents.
- Number of gas-related complaints.
- Contractor performance against agreed service standards.
- Quality assurance inspection results.
- Percentage of relevant employees completing mandatory training.

- Percentage of carbon monoxide alarms installed, tested and maintained in accordance with programme.
- Number of gas supplies capped, annual safety checks completed and reinstated within agreed timescales.

Performance information shall be reviewed regularly by operational managers and reported through Soha's governance framework to identify trends, emerging risks and opportunities for continual improvement.

8.2 Tenant Satisfaction Measures (TSMs)

Gas safety is directly measured through the Regulator of Social Housing's Tenant Satisfaction Measures (TSMs) under BS01 – Gas Safety Checks.

BS01 measures the proportion of homes for which all required gas safety checks have been carried out and appropriately recorded at the end of the relevant reporting year. This includes required gas safety checks within individual dwellings and, where applicable, communal or other relevant parts serving those dwellings.

Effective implementation of the Gas Safety Procedure therefore contributes directly to Soha's compliance with this Building Safety TSM and supports:

- Residents feeling safe within their homes.
- Confidence in Soha's management of gas and building safety.
- Effective management and maintenance of gas appliances, installations and relevant communal systems.
- Compliance with statutory gas safety requirements.
- Timely completion and accurate recording of required gas safety inspections and servicing.
- Identification and appropriate management of gas safety defects and risks.

Performance against BS01, together with gas servicing data, overdue checks, access issues, identified defects, remedial actions and relevant resident feedback, will be monitored and reviewed to identify trends, risks and opportunities for continual improvement.

Important: BS01 measures whether the required gas safety checks have been completed and recorded; it does not itself measure the completion of remedial actions identified during those checks. However, Soha remains responsible for ensuring that any required remedial actions are completed appropriately and within the necessary timescales. The RSH specifically confirms that remedial actions are outside the BS01 calculation but must still be addressed as required.

Three Lines of Assurance

Soha adopts a Three Lines of Assurance model to provide confidence that gas safety risks are effectively managed.

First Line of Assurance – Operational Management

Operational teams are responsible for the day-to-day delivery of gas safety compliance through:

- Statutory servicing programmes.
- Routine inspections.
- Contractor management.
- Responsive repairs.
- Record management.
- Operational supervision.

Second Line of Assurance – Compliance Oversight

Independent oversight is provided through:

- Health & Safety audits.
- Compliance monitoring.
- KPI reporting.
- Quality assurance inspections.
- Contractor performance reviews.
- Policy compliance monitoring.

Third Line of Assurance – Independent Assurance

Independent assurance is provided through:

- External audits.
- Independent technical inspections.
- Internal Audit.
- Board scrutiny.
- Regulatory inspections.
- Independent compliance reviews.

Findings from all three lines of assurance shall be reviewed by the Senior Leadership Team and reported to the Board where appropriate.

9. Monitoring & Review

The effectiveness of this Policy shall be monitored through:

- Compliance audits.
- Performance reporting.
- Contractor performance reviews.
- Quality assurance inspections.
- Resident feedback.
- Incident investigations.
- Legislative compliance reviews.
- Internal and external assurance activities.

This Policy shall be reviewed:

- Every three years as part of Soha's policy review programme.
- Earlier where there are significant legislative, regulatory or organisational changes.
- Following serious gas-related incidents or enforcement action.
- Following recommendations arising from audits, inspections or investigations.

- Where changes to recognised industry guidance or best practice require amendment.

Lessons learned from incidents, audits, complaints and performance monitoring shall be incorporated into future revisions of this Policy to support continual improvement and ensure Soha continues to meet its statutory obligations and delivers safe, high-quality services to residents.

Version number - 4			
Members' Forum for information	10 September 2026	SLT approved Board approved	10 August 2026 24 July 2025
EIA completed	11 August 2026	Review date (annually by SLT) Full review date (every 3 years by Board)	By July 2027 By July 2028
DPIA checklist completed	11 August 2026		
Amendments	Comprehensive review to align with Safety and Quality Consumer Standard, ARK Landlord Compliance Audit recommendations and the Three Lines of Assurance model.	Date 28/07/2026	