



GAS SAFETY POLICY

Gas Safety Policy

Regulation and Legislation	This policy links to or considers: • The Gas Safety (Installation and Use) (Amendment) Regulations 2018; • 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); • Provision and Use of Work Equipment Regulations 1998; • Construction, Design and Management Regulations 2015; • Landlord and Tenant Act 1985; • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR); • The Smoke and Carbon Monoxide (Amendment) Regulations 2022; • The Social Housing (Regulation) Act 2023; • Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025.
Approved by	[Approved] – [date approved]
Scope	This policy outlines our policy on how Imani Housing Cooperative Ltd. as a business approaches and manages gas safety and take into account our statutory and regulatory responsibilities.
Reference to “we” or “us” includes reference to our group, including any subsidiaries.	

1 Introduction

- 1.1 This Gas Safety Policy details how we will meet the requirements of the Gas Safety (Installation and Use) (Amendment) Regulations 2018. In addition to this, the policy provides assurance to the Board that measures are in place to ensure compliance with the regulations and to identify, manage and/or mitigate risks associated with gas fittings, appliances, and flues.
- 1.2 The policy is relevant to all employees, tenants, contractors, and other persons who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure

they understand our obligations to maintain a safe environment for tenants and employees within the home of each tenant or areas of buildings.

- 1.3 We will follow a systematic approach to the management of gas safety to ensure it meets the requirements set out in the Gas Safety (Installation and Use) (Amendment) Regulations 2018 and other relevant legislation relating to gas safety. This is to ensure the safety of tenants, employees, and members of the public.

2 Policy Statement

- 2.1 We recognise our duty to comply with the Gas Safety (Installation and Use) (Amendment) Regulations 2018 and other relevant legislation and guidance. It is our objective to ensure that gas is managed effectively, and employees understand their duty to contribute to the robust management of gas safety.

2.2 Definitions and Abbreviations

The following abbreviations and definitions are used in this policy:

2.2.1 LSGR

Landlord and Safety Record Inspection.

2.2.2 Gas Safe

A government approved body for the accreditation of registered gas engineers.

2.2.3 RIDDOR

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.

- 2.3 The key objectives of this policy are to establish:

- Landlord obligations;
- Roles and responsibilities;
- Gas safety funding;
- Gas safety principles;
- Inspection and testing regime;

- Requirements of The Construction, Design and Management Regulations 2015 (CDM);
- Compliance follow up work;
- Record Keeping;
- Competent person;
- Training;
- Quality Assurance Audit;
- Non-compliance; and
- Unsafe Situations and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.

3 Policy Principles

3.1 Landlord Obligations

3.1.1 We shall ensure no person is permitted to carry out any works on gas installations unless competent to do so. Current competency is approved by the “Gas Safe Register” (www.gassaferegister.co.uk).

3.1.2 The Gas Safety (Installation and Use) (Amendment) Regulations 2018 impose duties on landlords to protect tenants’ 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 appliances, flues, fittings, and carbon monoxide detectors are maintained in a safe condition. Gas appliances should be serviced in accordance with the relevant manufacturer’s instructions. If these are not available, it is recommended appliances are serviced every twelve months unless advised otherwise by a Gas Safe registered engineer.
- Ensure the Landlord Gas Safety Record (LGSR) inspection is carried out within 12 months of the previous LGSR check.
- Have all installation, maintenance and gas safety checks done by a registered Gas Safe engineer.
- Keep a record of each LGSR safety check certificate for a minimum of two years.

- Issue a copy of the latest LGSR certificate to existing tenants within 28 days of the inspection being completed, or to any new tenant at the start of their tenancy.
- Display a copy of the latest LGSR inspection certificate in a common area of a building where the gas appliance(s) serves a communal heating system to multiple homes.

3.1.3 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) are fitted in any room being used as sleeping accommodation and, any room that is subsequently converted into such accommodation.

3.2 **Gas Safety Principles**

3.2.1 We will hold accurate records against each property we own or manage, setting out the requirements for Landlord gas safety checks and servicing of all gas fittings, appliances, and flues.

3.2.2 We will ensure that each tenanted property with a gas appliance(s) will have a valid Landlord gas safety record (“LGSR”) which is no more than 12 months older than the previous LGSR or the installation date of a new appliance(s).

3.2.3 We will ensure robust management processes are in place to take advantage of the amendments to regulations 36(a) and 36(3) of the Gas Safety (Installation and Use) (Amendment) Regulations 2018. These amendments allow the LGSR inspection to be done up to two calendar months before the expiry date of the current LGSR and retain the original deadline date. This allows flexibility and prevents any unnecessary shortening of the LGSR cycle (the LGSR inspection can be done and completed within 10 months and 1 day of the previous LGSR inspection). The new, LGSR certificate issued by the contractor can be dated using the expiry date of the previous LGSR certificate.

3.2.4 We will ensure that copies of all LGSRs are provided to tenants within 28 days of completion or displayed in a common area where necessary upon completion of the LGSR.

3.2.5 We will ensure that gas safety checks are carried out prior to the commencement of any new tenancy (void properties), mutual exchange and/or transfer and that the tenant receives a copy of the LGSR prior to, or immediately after moving in.

- 3.2.6 Our Gas Safe contractors will carry out a visual inspection of tenant own gas appliances (boilers, gas fires, gas cookers, etc.). Where appliances are found to be faulty these will be disconnected, a warning notice (At Risk or Immediately Dangerous) will be issued to us or the tenant.
- 3.2.7 In accordance with the Smoke and Carbon Monoxide (Amendment) Regulations 2022. We will install, test, maintain, and replace smoke / carbon monoxide detectors as part of the LGSR inspection or when accordingly notified at other times.
- 3.2.8 We will carry out an LGSR inspection of all properties where the gas supply or meter has been capped off. This is to ensure the gas supply has not been reconnected by the tenant.
- 3.2.9 We will carry out an LGSR inspection of properties where tenants have chosen for personal reasons not to use the gas supply in their property. This is to check the tenant's wellbeing and to assess that the lack of heating is not adversely affecting the condition of the building fabric e.g. damp or mould.
- 3.2.10 We will ensure only competent Gas Safe registered engineers undertake gas testing, inspection, maintenance, and gas appliance installations.
- 3.2.11 We will immediately remove any conventional open flue gas appliances in any room that is being used for sleeping accommodation e.g. bedrooms.
- 3.2.12 We will carry out a LGSR and issue a new LGSR certificate following the installation of new gas appliances. The next LGSR inspection will be due 12 months after the installation date.
- 3.2.13 We will have a robust process in place to gain access to properties where there are known vulnerable tenants. This is to ensure compliance with this policy and to safeguard the wellbeing of the vulnerable tenant.
- 3.2.14 We will have a defined 'no access' procedure to ensure all reasonable steps are taken by the gas contractor and us to meet the 12-month deadline for LGSR inspections.
- 3.2.15 We will ensure that any chimney stack(s) or flue that has a gas appliance attached to it is inspected every twelve months by a Gas Safe registered engineer. This will be recorded on the LGSR certificate. Any defects are to be reported to us immediately and the associated gas appliance is to be capped off, made safe and a warning label secured.

3.3 **Inspection Testing Regime**

3.3.1 We will carry out a programme of LGSR inspections, boiler services and detector tests to all domestic properties with gas appliances. This inspection will include all gas fittings, appliances and flues in the property and will be completed 12 months from the date of the previous LGSR, which may have been carried out at the start of a new tenancy or following the installation of a new gas appliance.

3.3.2 We will ensure all gas safety inspections, tests and installations are carried out by a Gas Safe registered engineer in accordance with any manufacturer instructions or industry best practice.

3.4 **Construction, Design and Management Regulations 2015 (CDM) Requirements**

3.4.1 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, gas appliance installations and refurbishment projects.

3.5 **Compliance Work(s)**

3.5.1 We will ensure there is a robust process in place for the management of any follow-up gas safety works highlighted on the LGSR Certificate or in relation to warning notices issued by the Gas Safe Contractor.

3.5.2 In accordance with the Smoke and Carbon Monoxide (Amendment) Regulations 2022, we will ensure that a carbon monoxide detector is installed in every residential property where a gas appliance (excluding gas cookers) is installed.

3.5.3 We will replace any faulty smoke or carbon monoxide detector in a residential property where faults are identified as part of the LGSR inspection or when notified at other times.

3.5.4 We will ensure there is a robust process in place to investigate and manage all RIDDOR notices that may be issued in relation to breaches of the current gas safety regulations.

3.6 **Record Keeping**

3.6.1 We will establish and maintain an asset register of all residential properties that have gas appliances installed in them. The asset register

will hold data against each property and will detail the make, model, serial number(s) of installed gas appliances.

3.6.2 We will ensure contractors use Gas Safe registered engineers and that they comprehensively records the details of all gas appliances (make, model, serial number) installed in the property. This will be achieved by randomly checking the LGSR certificates and when quality assurance checks are undertaken by third party contractors.

3.6.3 We will establish and maintain accurate records of all completed LGSR certificates, warning notices and remedial works. These are required to be kept for at least two years.

3.6.4 We will hold and maintain accurate records on the competencies and qualifications held by gas engineers that are registered with Gas Safe. Only Gas Safe registered gas engineers will be permitted to work in our residential properties.

3.7 **Competent Persons**

3.7.1 We will ensure the responsible person appointed for the effective operational delivery of gas safety management is appropriately trained to comply with relevant legislation and guidance.

3.7.2 We will ensure that only suitably competent Gas Safe accredited contractors are procured and appointed to undertake works to gas fittings, appliances, and flues. The responsible person will check the relevant qualifications of the contractor's employees to ensure they are qualified and accredited for the work to be carried out. These checks will be undertaken every 6 months or when a new employee starts.

3.8 **Training**

3.8.1 This policy will be subject to a range of internal training. The training initially will be bespoke to the individuals concerned and refresher training will be required as appropriate.

3.9 **Quality Assurance (QA) Audit**

3.9.1 We will carry out independent third-party quality assurance audits of LGSR inspections, gas appliance installations and reactive gas repair works. Best practice suggests this should be a 5% sample of the total gas works carried out.

3.10 **Non-Compliance**

- 3.10.1 Any non-compliance issue identified at an operational level will be formally reported to Chief Executive in the first instance.
- 3.10.2 They will agree an appropriate course of corrective action with the Responsible Person to address the non-compliance issue(s) and report details of the same to the Senior Management Team.
- 3.10.3 The Senior Management Team will ensure the Board are made aware of any non-compliance issue(s) so they can consider the implications and act as appropriate.
- 3.10.4 In the case of a serious non-compliance issue, the Senior Management Team and the Board will consider whether it is necessary to defer the matter to the Regulator of Social Housing and/ or Gas Safe and terminate the gas safety contract between us and the non-compliant contactor(s).
- 3.10.5 In all cases, our response, investigation and remedial works will be carried out as required by the timescales prescribed in Awaab's Law (detailed further below).
- 3.11 **Unsafe Situation and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations**
- 3.11.1 Any smell of gas or suspected symptom of carbon monoxide poisoning detected by or reported to any employee will be treated as a gas emergency and immediately reported to the National Gas Transporter or appropriate gas supplier.

4 Awaab's Law

- 4.1 The Social Housing (Regulation) Act 2023 seeks a more effective regulation regime for social housing. This includes the implementation of the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (also known as 'Awaab's Law') on 27 October 2025. This policy is subject to change as full details or amendments are published. The requirements are as follows:
- From October 2025, social landlords have to address damp and mould hazards that are considered significant hazards within fixed timescales. **"Significant hazard"** means, in relation to a social home, a relevant hazard that poses a significant risk of harm to the health or safety of an occupier of the social home. In 2026, requirements will extend to apply to a wider range of hazards where they present a significant risk of harm. These include excess

cold and excess heat, falls associated with baths and surfaces including stairs, structural collapse and explosions, fire and electrical hazards, and domestic and personal hygiene. In 2027, requirements will extend to all remaining Housing Health and Safety Rating System hazards other than overcrowding, where they present a significant risk of harm. The full list of 29 hazards can be found in Schedule 1 to the Housing Health and Safety Rating System (England) Regulations 2005, which includes carbon monoxide and fuel combustion products (nitrogen dioxide, sulphur dioxide and smoke).

- From October 2025, social landlords also have to address all hazards that are emergency hazards as soon as possible and within no longer than 24 hours. “**Emergency hazard**” means a relevant hazard that poses an imminent and significant risk of harm to the health or safety of an occupier of the social home.

4.2 We will adhere to the proposed timescales set out within the new legislation.

4.3 The legislation requires that the following timescales will be adhered to where we determine there is a significant hazard:

- An investigation will be carried out within 10 working days. Where the investigation confirms an emergency hazard, we will follow the process for emergency hazards outlined below.
- Where an investigation confirms a significant hazard, we will:
 - (i) Provide a written summary of the investigation to the resident within 3 working days of conclusion;
 - (ii) Complete relevant safety works and begin, or take steps to begin, any further works to prevent reoccurrence within 5 working days of concluding the investigation;
 - (iii) Where further supplementary works are required and it is not possible to begin them within 5 working days, we will start these as soon as reasonably practicable and within 12 weeks of the investigation concluding.
- If the property cannot be made safe, we will offer suitable alternative accommodation until the significant hazard is fully resolved.

4.4 The legislation requires that the following timescales will be adhered to where we determine there is an emergency hazard:

- An investigation will be carried out within 24 hours.
- Where an investigation confirms an emergency hazard, we will:
 - (i) Complete all relevant safety works and make the property safe within 24 hours;
 - (ii) If the property cannot be made safe within 24 hours, we will offer suitable alternative accommodation until the works are completed;
 - (iii) Provide a written summary of the investigation within 3 working days of conclusion.

5 Information to Tenants

5.1 On an annual basis (and at the time of new tenants being housed), we will outline the pertinent issues of gas safety by way of written communication. This will include:

- emergency contact numbers and reporting procedures;
- our commitment to gas safety;
- tenants' responsibilities under their Tenancy Agreement;
- key health and safety risks;
- the importance of the annual safety check and the need for access to premises; and
- key points on the safe use of gas and gas appliances including action to be taken if a gas leak is suspected.

5.2 We will, in due course, define a procedure for dealing with unauthorised gas installations, repairs, disconnections, and other gas related activities which are undertaken without our permission.

5.3 Following appropriate tenant communications and all reasonable attempts to gain access to a property, we will take legal action by way of seeking an injunction to obtain entry to a property to carry out our statutory duties e.g. LGSR inspection.

5.4 **Temporary Heating**

- 5.4.1 We shall ensure that the gas contractor responsible for maintenance is contractually required to supply temporary heaters where a loss of heating occurs, and no other source of heating is available within the property. LPG or other bottled gas heating sources will not be permitted as a temporary source of heating.

6 Planned Maintenance

- 6.1 We shall implement a programme of gas boiler and heating system replacements based on stock condition assessments or gas repairs.

7 Roles and Responsibilities

- 7.1 The main roles and responsibilities for named individuals with accountability for the following aspects of the gas safety management system are as follows:

Role	Responsibility
Chief Executive	• Has overall responsibility for the Gas Safety Policy but can delegate actions to the Responsible Person and other responsible staff. These actions also relate to gas contractors acting on our behalf.
Responsible Person Cooperative Development Worker	• Will be responsible for the day-to-day running and implementation of the Gas Safety Policy. • Responding to reports of gas safety issues and undertaking risk assessments. • Responsibility for arranging remedial works. • Consider the extensiveness of remedial works needed and whether residents

	should be moved during this period. • Maintaining communication with the residents about gas safety instances and remedial works being undertaken, including providing a written summary of investigation.
All Employees	• All employees, irrespective of position shall take reasonable care for their own health and safety and that of other persons who may be adversely affected by gas safety, including tenants, contractors, visitors, and members of the public. • Co-operate as appropriate with other staff and agencies to ensure compliance with this policy and all other legal requirements. • Report any concerns that they may have in relation to the management of gas safety and compliance with our legal obligations or this policy to the 'Responsible Person'.

8 **Review**

- 8.1 We will carry out a fundamental review of this policy every three years or sooner subject to legal, regulatory changes or if internal changes require it.

9 **Essential Information**

- 9.1 All our policies and procedures are developed in line with our approach to the following: data protection statement, equality diversity and inclusion (EDI) approach, complaints policy and our regulatory and legal obligations to ensure we deliver services in a lawful manner and treat people equally and fairly. Our privacy policy can be accessed on our website www.imanihousing.org.uk.

Document control

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