

Date Issued	28 May 2026
Last Reviewed	n/a
Department	Asset Management
Title	Gas Safety & Inspection Policy
Objective	To ensure effective inspection, maintenance and management of gas systems
Responsible	Director of R3 & Asset Management
Next Review Date	May 2031

1.0 Introduction

- 1.1 East Lothian Housing Association is committed to ensuring the safety of tenants, employees, contractors, and members of the public by maintaining all gas installations, appliances, pipe work and associated systems in a safe condition and complying with all relevant legal and regulatory requirements.
- 1.2 The Association recognises that effective gas safety management is essential to protect life, property and organisational reputation.
- 1.3 The aim of this policy is to ensure the safe installation, use, and maintenance of all gas appliances, fittings, and systems. It seeks to protect the health and safety of employees, tenants, and visitors by preventing gas leaks, carbon monoxide exposure, fires, and explosions. The policy ensures compliance with all relevant legal requirements, promotes regular inspections and maintenance by competent engineers, and establishes clear procedures for reporting and addressing gas safety issues, thereby minimising risks and safeguarding people and property.
- 1.4 The procedures detailed are intended to facilitate the effective management of our gas contractor as well as all additional gas safety management issues, ensuring that all reasonable steps are taken to comply with the Health & Safety at Work etc. Act 1974 and the Gas Safety (Installation & Use) Regulations 1998.

2.0 Scope of Policy

- 2.1 This policy applies to:
 - All domestic properties owned or managed by the Association
 - Communal gas installations and plant

Approved at ELHA Board 28/05/26

- Leased accommodation where we have landlord responsibilities
- Employees, contractors, consultants and agents acting on behalf of the Association

2.2 The policy covers the management, inspection, maintenance, servicing, monitoring, and emergency handling of:

- Gas appliances
- Gas pipework and fittings
- Flues
- Carbon Monoxide monitoring systems
- Gas safety compliance activities across the association's housing stock

It also extends to:

- Contractor management
- Tenant communications
- Record keeping
- Reactive repairs and emergencies
- Empty Homes / re-let procedures
- Quality assurance and compliance monitoring

2.3 Our policy is primarily focused on landlord gas safety obligations and compliance with legislation such as the Health and Safety at Work etc. Act 1974, and Gas Safety (Installation and Use) Regulations 1998.

3.0 Legal and Regulatory Framework

3.1 We will comply with all relevant legislation and regulations including the following (the list is not exhaustive):

- Health and Safety at Work etc. Act 1974
- Workplace (Health, Safety & Welfare) Regulations 1992, as amended

Approved at ELHA Board 28/05/26

- Management of Health and Safety at Work Regulations 1999, as amended
- Gas Safety (Installation and Use) Regulations 1998
- Gas Safety (Management) Regulations 1996
- Gas Safety Guidance (supporting this policy)

3.2 This policy also takes account of the following policies and procedures:

- Maintenance Policy
- Empty Homes Policy
- Mutual Exchange Policy
- Chargeable Repairs Policy
- Mutual Repairs Policy
- Complaints Policy and Procedure
- Tenant Participation Strategy
- Communication Strategy
- Customer Care Policy and Procedure
- Health & Safety at Work Policy
- Records Management Policy

4.0 Objectives of Gas Safety

We will maintain a Gas Safety Management System to demonstrably manage gas safety in all our premises.

4.1 The Gas Safety Management System will cover, as a minimum:

- Roles and responsibilities
- Information, instruction and training
- Asset register
- Contractor selection and control

- Gas Safety Certificates/Checks
- Maintenance Procedures
- Record Keeping
- Information for Tenants
- Gas Safety Internal Monitoring
- Reactive Repairs
- Emergency Procedures
- Quality Assurance
- Void / Re-Let Procedures
- RIDDOR
- Temporary Heating
- Audit and Review

5.0 Definitions

- 5.1 **Gas Appliance** – means an appliance for the heating, lighting, cooking or other purposes for which gas can be used. Portable or mobile appliances are not covered.
- 5.2 **Gas Fittings** – means pipework, valves (other than Emergency Controls), regulators and meters and fittings etc. designed for use by consumers of gas.
- 5.3 **Flue** – means a passage for conveying the products of combustion from a gas appliance to the external air.
- 5.4 **Gas** – includes natural gas.

6.0 Competent Persons

Approved at ELHA Board 28/05/26

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).

7.0 Roles and Responsibilities

We have defined roles and responsibilities with accountability for the following aspects of the gas safety management system:

- Overall responsibility
- Delivery of the gas safety management programme
- Administration of the gas safety management programme
- Contractor selection, control and monitoring
- Repairs
- Communications with tenants
- Emergencies

7.1 The ELHA Board, whilst not actively involved in the day to day running of the Association, is collectively responsible for providing leadership and direction on ensuring the Landlords responsibilities for Gas Safety & Inspection are discharged.

7.2 The Chief Executive is responsible for the overall running of the Association. It is recognised that this function incurs the overall responsibility for Gas Safety & Inspection within ELHA.

7.3 The Chief Executive will hold ultimate responsibility for the implementation of the Association’s policy, procedures and arrangements for Gas Safety & Inspection, although the Director of R3 & Asset Management will have executive control of this function.

7.4 The Director of R3 & Asset Management has executive responsibility for implementing and overseeing the Association’s Gas Safety & Inspection on behalf of the Board and Chief Executive.

Key responsibilities include:

- Overall accountability for the Gas Safety Management System

Approved at ELHA Board 28/05/26

- Ensuring compliance with legislation
- Approving gas safety policies and procedures
- Providing strategic leadership and governance assurance
- Reporting compliance performance to the Board
- Ensuring adequate resources, staffing, and contractor arrangements
- Authorising escalation actions for serious non-compliance
- Ensuring risks are identified, monitored, and mitigated
- Reviewing audit findings and ensuring corrective actions are implemented
- Overseeing organisational compliance culture

7.5 The Asset Manager is the operational lead and responsible for managing delivery of the gas safety programme.

Key Responsibilities include:

- Managing the annual gas servicing programme
- Ensuring landlord gas safety inspections are completed on time
- Monitoring compliance performance and KPIs
- Managing contractor performance and service delivery
- Overseeing no-access procedures
- Coordinating remedial and reactive repairs
- Monitoring void property gas safety checks
- Ensuring temporary heating arrangements where required
- Managing gas safety records and certification processes
- Escalating overdue inspections and unsafe properties
- Supporting audits and quality assurance inspections
- Producing operational reports for senior management

- 7.6 The Safety & Compliance Officer is responsible for compliance monitoring, administration, assurance, and coordination.

Key Responsibilities include:

- Maintaining gas safety compliance databases and records
- Tracking inspection due dates and certification expiry
- Scheduling servicing appointments
- Monitoring contractor documentation and certification
- Maintaining audit trails for no-access attempts
- Reviewing compliance data and identifying gaps
- Supporting internal audits and external QA inspections
- Issuing tenant communications and access notices
- Escalating non-compliance issues to management
- Monitoring corrective actions and follow-up works
- Ensuring documentation is retained in line with legal requirements

7.7 Tenant Responsibilities

Under this Gas Safety & Inspection Policy, tenants have several important responsibilities and requirements designed to help the Association meet its legal gas safety duties and keep residents safe. Their most important obligation is to provide access for Gas Safety Inspections.

7.7.1 Tenants must:

- Allow access for annual landlord gas safety inspections
- Permit servicing, maintenance, and repair work
- Cooperate with contractors and staff arranging appointments

7.7.2 Tenants have responsibilities under their tenancy agreement to provide access for gas safety checks. Failure to provide access can:

- Place lives at risk

Approved at ELHA Board 28/05/26

- Breach tenancy conditions and potentially lead to legal enforcement action

7.7.3 Tenants must report gas leaks or safety concerns immediately, and are expected to:

- Report suspected gas leaks immediately
- Contact Scottish Gas Networks (SGN) where appropriate
- Notify us of gas-related issues.

7.7.4 Typical concerns include:

- Smell of gas
- Carbon Monoxide alarm activation
- Faulty appliances
- Damaged flues
- Poor ventilation
- Signs of unsafe combustion

7.7.5 Tenants must use gas appliances safely, and should:

- Follow manufacturer instructions
- Avoid misuse of appliances
- Ensure vents and flues are not blocked
- Recognise warning signs of unsafe appliances

7.7.6. Tenants must not carry out unauthorised gas work. Gas-related work must only be carried out by a Gas Safe registered engineer. Tenants must not:

- Install gas appliances themselves
- Use unqualified tradespeople
- Tamper with gas fittings
- Disconnect appliances improperly

Approved at ELHA Board 28/05/26

- Alter pipework or ventilation systems

Unauthorised work may breach Tenancy Agreements and create serious safety risks.

7.7.7 Tenants must allow remedial and emergency works to be carried out. Where an appliance or installation is unsafe, tenants must cooperate with:

- Emergency attendance
- Appliance isolation
- Temporary heating arrangements
- Follow-up repairs

This includes situations where gas supplies are capped or where appliances are classified as “At Risk” or “Immediately Dangerous”.

7.8 Contractor Responsibilities

The contractor has significant operational and technical responsibilities for delivering gas safety and inspection services, this includes:

- Carrying out gas safety inspections and servicing
- Maintaining Gas Safe competence
- Delivering reactive repairs and emergency response
- Operating the No-Access procedure
- Reporting unsafe situations
- Maintaining accurate records
- Cooperating with monitoring and quality assurance
- Following agreed procedures and scope of works
- Supporting compliance with RIDDOR

8.0 Contractor Selection and Control

8.1 We will define a detailed scope of works for the annual gas servicing and maintenance contract and will follow through a rigorous tendering and contractor selection process.

Approved at ELHA Board 28/05/26

- 8.2 Contractors will be required to demonstrate compliance with the competency requirements of the regulations and will be Gas Safe Registered.
- 8.3 We will maintain a formal system of contractor monitoring in our Housing Management System, HomeMaster, to ensure the Gas Safety Management System continues to operate in compliance with the agreed scope of works and with documented procedures and that any non-conformances, ineffective arrangements and problem areas are quickly identified and actioned upon.
- 8.4 We have developed a defined 'no access' procedure for staff use, to ensure all reasonable steps are taken by the contractor and us to meet the twelve month deadline for landlord's gas safety checks.

9.0 Record Keeping

- 9.1 Under current legislation and in line with our Data Retention Schedule, Landlord Gas Safety Records must be kept for a period of two years. We will maintain a formal system within HomeMaster for recording all activity in relation to gas servicing, maintenance, repairs, installations, emergencies and all other relevant gas safety management data.
- 9.2 In relation to the annual gas safety inspection programme, we will hold the following records as a minimum:
- Inspection records, findings and actions
 - Reports and communications from gas contractors
 - No access reports and actions (audit trail)
 - Properties that have been capped
 - Intermediate safety checks on properties (voids)
 - External Audit Reports
 - Maintenance and repair records
 - Emergency situations and actions taken
 - Letters of complaint

10.0 Information to tenants

Approved at ELHA Board 28/05/26

10.1 On an annual basis (and at the time of new tenants being housed), we will outline the pertinent issues of gas safety to tenants through:

- elha.com
- My Home
- E-news & Talkback newsletter
- Regular Communications

This will include:

- Emergency contact numbers and reporting procedures
 - Our commitment to gas safety
 - Tenant responsibilities under their Tenancy Agreement to provide access for gas safety checks
 - Key Health & Safety risks
 - The importance of the annual safety check and the need for access to premises
 - Key points on the safe use of gas and gas appliances including action to be taken if a gas leak is suspected
 - The requirement to ensure that all gas related work must be carried out by a Gas Safe registered engineer
- 10.2 We have established procedures for dealing with unauthorised gas installations, repairs, disconnections and other gas related activities which fall foul of the Tenancy Agreement.

11.0 Gas Safety Internal monitoring

11.1 We will use HomeMaster to monitor the landlords gas servicing inspection and all gas repair work. Performance is shared through the Health & Safety Committee and the Performance Panel.

11.2 Our monitoring system will include, as a minimum, timeous review of:

- All servicing and repair certificates
- Unsafe gas systems
- No access procedure, notices and problems
- Capped properties
- Void properties
- Quality assurance / quality control reports
- Repairs and maintenance reports

12.0 Reactive Repairs and emergencies

- 12.1 As well as carrying out annual servicing to gas appliances and raising landlord's gas safety records, the contractor will provide a full reactive repairs and emergency response service. This will be properly defined and tenants made aware of the gas company's services and contact details.
- 12.2 Where the contractor has been unable to obtain access to undertake necessary repair work the contractor must bring the situation to our attention. We will ensure that the tenant is contacted as quickly as the situation demands.
- 12.3 Currently, Scottish Gas Networks (SGN) have a statutory duty to attend gas escapes reported to them within two hours of receipt. In the main, gas escapes are likely to occur within individual properties and tenants should in the first instance contact SGN Emergency Services. SGN will normally shut down the gas supply to a tenants home where a leak is found and will not carry out any further works. We will follow up a report of a gas leak and instruct the gas contractor to attend.
- 12.4 Our contractor will be asked to provide temporary heating where repairs cannot be readily made and the heating system remains switched off. They will advise us of the repair problem, and we will instruct any agreed remedial work.

13.0 Quality Assurance (QA)

- 13.1 We will carry out quality assurance (QA) work and shall appoint an external third party to carry out a minimum inspection of 10% of completed annual services.
- 13.2 The contractor undertaking the QA work will require to be Gas Safe registered and employ fully qualified engineers.

Approved at ELHA Board 28/05/26

- 13.3 Where a QA inspection identifies non-compliances or where unsatisfactory performance of the primary gas contractor is being observed, details of the problems and suggestions for rectification will be clearly set out in the QA contractor's report.
- 13.4 Where the QA contractor identifies situations that pose an immediate or imminent risk to health, the contractor will notify us as soon as practicable. These notifications will be in addition to the regular reporting regime.

14.0 Empty Homes / Relet procedures

- 14.1 We have procedures in place for gas safety inspections associated with empty homes and this will be included in the overall gas safety management system, contractor's contractual requirements and monitoring procedures.

15.0 Long Voids

- 15.1 Where a property is to be closed up on a long term or permanent basis then the existing gas supply shall be disconnected from the pipework within the property. The gas supply shall be physically disconnected at the meter point and both cut ends blanked. Where appropriate, SGN shall be advised and requested to remove the meter supply from the property.

16.0 Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR)

- 16.1 In relation to gas safety there are duties imposed upon gas conveyers, suppliers, etc. to report cases whereby death or a major injury (as defined by regulations) occurs out of or in connection with the gas supplied.
- 16.2 It is also recognised that a contractor will have a duty to formally report certain situations where it is deemed likely that the gas installation may cause death or major injury. The types of faults likely to cause death or major injury and would be reportable include:
- A dangerous gas leak arising, for example, from the use of unsatisfactory materials or bad workmanship
 - A gas appliance which spills products of combustion or shows signs of incomplete combustion or shows signs of combustion problems due to inadequate ventilation
 - An appliance which is not suitable for use with the gas supplied
 - An appliance in which a safety device has been made inoperative

Approved at ELHA Board 28/05/26

- Use of unsatisfactory materials in gas connections
 - An appliance installation which has become dangerous through faulty servicing
- 16.3 Further information on RIDDOR is contained within the Health and Safety control manual.

17.0 Temporary Heating

- 17.1 We will not provide LPG or other bottled gas heating sources to tenants as a temporary source of heating.
- 17.2 If we provide electrical heaters as a temporary source of heating, this will be in line with our Electrical Safety Policy.

18.0 Equalities

- 18.1 We are committed to meeting our obligations under the Equality Act 2010 and the Scottish Social Housing Charter, ensuring that all tenants are treated fairly, with dignity and respect and are able to access our services without disadvantage.
- 18.2 We recognise that some tenants may be more vulnerable or face barriers in accessing gas safety services. This may include, but is not limited to:
- Older people
 - People with disabilities, long-term health conditions or mental health needs
 - Individuals with learning difficulties or cognitive impairments
 - Tenants whose first language is not English
 - Tenants with literacy, communication or digital access needs
- 18.3 In delivering our gas safety and inspection services, we will:
- Take account of individual circumstances when planning inspections, servicing, and access arrangements, ensuring a flexible and person-centred approach where required
 - Make reasonable adjustments in line with the Equality Act 2010 to support tenants to meet their responsibilities and maintain safety

Approved at ELHA Board 28/05/26

- Provide information in accessible formats, including large print, easy-read, or alternative communication formats where needed
- Offer translation and interpretation services, ensuring that language is not a barrier to understanding important safety information
- Ensure that all communications relating to gas safety are clear, proportionate, and easy to understand, supporting tenants to take appropriate action
- Work in partnership with carers, family members, or support agencies where appropriate to facilitate access and ensure the safety of vulnerable tenants

18.4 We will also ensure that:

- No tenant is unfairly disadvantaged in meeting gas safety requirements
- Services are delivered in a way that promotes equality, inclusion, and accessibility
- Staff and contractors are aware of equality duties and the importance of supporting vulnerable tenants

18.5 Through this approach, we aim to ensure that all tenants are able to:

- Understand gas safety risks
- Respond appropriately in an emergency
- Provide access for essential safety checks

This supports our wider commitment to tenant safety, compliance, and inclusive service delivery, in line with regulatory standards.

19.0 Data Protection

19.1 We are committed to protecting tenants' personal data and complying with the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR).

19.2 We will ensure that:

- Data shared is limited to what is necessary for the service

Approved at ELHA Board 28/05/26

- All contractors act as data processors and handle information securely
 - Contractors comply with data protection legislation and confidentiality requirements
 - Appropriate data sharing agreements are in place
- 19.3 Tenant information will be used only for the purposes of arranging and carrying out gas safety activities and will not be shared for any other purpose without consent or legal basis.
- 19.4 We will take all reasonable steps to ensure that personal data is:
- Kept secure
 - Accurate and up to date
 - Only retained for as long as necessary

20.0 Monitoring and Review

- 20.1 The Director of R3 & Asset Management is responsible for ensuring that all appropriate staff comply with this policy and the supporting procedures and will oversee this through the Health & Safety Committee.
- 20.2 The Asset Manager will submit quarterly reports on the performance of Gas Safety to the Health & Safety Committee and the Performance Panel. The reports will include performance against set targets or standards, progress on compliance safety inspections and expenditure compared with budget.
- 20.3 The ELHA Board will monitor strategic risks relating to gas safety and receive assurance on compliance performance through the reporting of Key Performance Indicators.

21.0 Policy Review

- 21.1 The Director of R3 & Asset Management will review this policy every five years or sooner if required by changes in legislation or organisational practice. Any minor changes will be approved by the Senior Management Team, whereas material changes will be submitted to the ELHA Board for approval.