The Whiteley Homes Trust

Gas Safety Management Policy

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EIA	Yes

Review Tracker

Review Date	Reviewed by	Changes Made	Approved by	Approved date	Version
July 2026	**Director of Operations / Head of Property & Compliance**	**Complete rewrite to align with current legislation, Building Safety Act 2022, Social Housing (Regulation) Act 2023, Gas Safety (Installation and Use) Regulations 1998, current Gas Safe Register technical guidance and the Regulator of Social Housing's Safety and Quality Standard**	**RECC** **Main Board**	**6/8/26** **15/9/26**	**2.0**

Introduction

At The Whiteley Homes Trust ("the Trust"), we are committed to providing homes, workplaces and communal facilities that are safe, well maintained and compliant with all statutory and regulatory requirements.

The safe management of gas installations is fundamental to protecting residents, employees, volunteers, contractors and visitors from the risks associated with natural gas and liquefied petroleum gas (LPG), including fire, explosion, carbon monoxide poisoning and gas leaks. Poorly maintained or unsafe gas appliances, flues or associated pipework can present a significant risk to life, health and property.

The Trust recognises that effective gas safety management extends beyond compliance with legislation. It forms an integral part of delivering safe homes, protecting vulnerable residents, preserving our historic estate and fulfilling our responsibilities as a Registered Provider of Social Housing regulated by the Regulator of Social Housing.

The Trust recognises that gas safety is one of its core landlord health and safety responsibilities. Effective governance, competent decision-making, accurate asset information and robust assurance arrangements are essential to protecting residents, employees, contractors and visitors and maintaining compliance with the Regulator of Social Housing's Safety and Quality Standard.

The Trust is committed to adopting a proactive, risk-based approach to gas safety through effective governance, planned inspection and servicing, preventative maintenance, competent contractor management, resident engagement and continuous improvement.

This policy sets out how the Trust manages gas safety across all premises and gas installations for which it has responsibility. It establishes clear governance arrangements, defines responsibilities and describes the systems used to ensure compliance with legislation, regulatory expectations and recognised industry best practice.

Scope of Applicability

This policy applies to all individuals engaged with The Trust, including employees, agency workers, bank workers and volunteers. Throughout this policy, these groups are referred to collectively as *"employees"* for clarity and ease of reference.

It also covers residents including beneficiaries, tenants in our private let homes and their households. Throughout this policy, these groups are referred to collectively as "residents" for clarity and ease of reference.

In addition, this policy extends to Trustees, third-party stakeholders, including contractors, suppliers, Gas Safe registered engineers, principal designers, principal contractors and external individuals or organisations that provide services on behalf of the Trust.

This policy applies to all buildings, plant and gas installations for which the Trust has legal responsibility, including but not limited to:

- Independent living cottages
- Huntley House
- Offices
- Community buildings
- Commercial premises

- The Café
- Workshops
- Plant rooms
- Boiler houses
- Central Heating Plant
- Gas-fired Water Heaters
- Commercial Kitchens
- Domestic Boilers
- Warm Air Heating Systems
- Flues
- Chimneys
- Gas Pipework
- Gas Meter Installations
- LPG Installations (where applicable)
- Temporary Gas Supplies associated with construction projects

The Trust's responsibilities are determined by the relevant Licence to Occupy, tenancy agreement, lease, management agreement or other legal arrangement.

Where gas installations fall outside the Trust's legal responsibility, the Trust will provide advice and guidance where appropriate to promote safe management and reduce the likelihood of unsafe gas installations.

The Trust is committed to openness and transparency. By clearly defining the scope of this policy, we seek to promote understanding, accountability and confidence among residents, employees and stakeholders.

Purpose

The objectives of this policy are to ensure that:

- The Trust complies with all applicable legislation, Approved Codes of Practice, regulatory requirements and recognised industry standards relating to gas safety.
- Landlord gas safety inspections are completed at least every twelve months in accordance with statutory requirements.
- Safe gas installations are maintained throughout the Trust's housing stock, communal buildings and workplaces.
- Gas safety forms an integral part of the Trust's wider Building Safety, Asset Management and Health & Safety Management Systems.
- Suitable inspection, servicing, maintenance and testing programmes are implemented for all gas installations.
- Competent Gas Safe registered contractors are appointed to undertake inspections, servicing, maintenance, repairs and installations.

- Risks associated with gas leaks, carbon monoxide, unsafe appliances and combustion products are effectively identified, assessed, controlled and monitored.
- Residents, employees, contractors and visitors are protected from avoidable gas safety risks.
- Appropriate financial and operational resources are made available to maintain statutory compliance and manage gas safety risks effectively.
- A clearly identified Gas Responsible Person is appointed with sufficient authority, competence and resources to implement the Trust's Gas Safety Management System and maintain compliance with the Gas Safety (Installation and Use) Regulations 1998.
- Performance is monitored through clearly defined Key Performance Indicators and reported regularly to the Executive Leadership Team, Resident Experience and Community Committee and Board.
- Residents receive clear information regarding annual gas servicing, carbon monoxide safety, emergency procedures and their responsibilities for providing access.
- Continuous improvement is achieved through auditing, performance monitoring, learning from incidents and responding proactively to changes in legislation, regulation and recognised good practice.

This policy shall be reviewed at least annually, or sooner following:

- A significant gas safety incident
- A reportable gas escape or carbon monoxide incident
- Enforcement action by the health and safety executive
- Changes in legislation, approved codes of practice or industry guidance
- Recommendations arising from audits or investigations
- Significant refurbishment or replacement of gas installations
- Organisational restructuring affecting management responsibilities

Legislative and Regulatory Framework

The Trust manages gas safety in accordance with all relevant legislation, Approved Codes of Practice, British Standards, Institution of Gas Engineers and Managers (IGEM) guidance, Gas Safe Register technical guidance and regulatory expectations, including but not limited to:

Primary Legislation

- Health and Safety at Work etc. Act 1974
- Gas Safety (Installation and Use) Regulations 1998 (as amended)
- Management of Health and Safety at Work Regulations 1999
- Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Building Regulations 2010 (as amended)
- Building Safety Act 2022
- Social Housing (Regulation) Act 2023
- Housing Act 2004

- Homes (Fitness for Human Habitation) Act 2018
- Pressure Systems Safety Regulations 2000 (where applicable)

Approved Codes of Practice and Guidance

The Trust manages gas safety in accordance with current guidance including:

- Health and Safety Executive Approved Code of Practice supporting the Gas Safety (Installation and Use) Regulations 1998
- Gas Safe Register Technical Bulletins
- Gas Industry Unsafe Situations Procedure (GIUSP)
- Institution of Gas Engineers and Managers (IGEM) Standards
- British Standards relating to gas installations and combustion appliances
- Relevant manufacturer's installation, servicing and maintenance instructions
- Current HSE guidance relating to gas safety and carbon monoxide.

Regulatory Requirements

The Trust also manages gas safety in accordance with the expectations of:

- Regulator of Social Housing – Safety and Quality Standard;
- Regulator of Social Housing – Transparency, Influence and Accountability Standard;
- Housing Ombudsman Complaint Handling Code;
- Health and Safety Executive (HSE);
- Gas Safe Register;
- Surrey Fire and Rescue Service where applicable;
- Local Authority Building Control where applicable.

Governance and Assurance

The Trust adopts the principles of the Gas Safety (Installation and Use) Regulations 1998 by ensuring that clearly identified Duty Holders, Responsible Persons and Competent Persons are appointed to manage gas safety risks. These appointments are supported by defined responsibilities, appropriate training, adequate resources and regular performance monitoring to provide assurance that statutory duties are being effectively discharged.

The **Head of Property & Compliance** is appointed by the Chief Executive Officer as the Trust's **Gas Responsible Person** and has delegated responsibility for implementing the Trust's Gas Safety Management System. This appointment does not remove the Chief Executive Officer's overall accountability for ensuring compliance with statutory duties.

The Trust recognises that effective gas safety management is fundamental to providing safe, quality homes. The Board will therefore receive regular assurance that gas safety risks are effectively managed and that the Trust continues to meet its statutory landlord compliance obligations, supporting compliance with the Regulator of Social Housing's Safety and Quality Standard.

Gas safety is delivered through a robust governance framework which includes:

- Clearly defined roles and responsibilities
- Competent Responsible Persons
- Annual landlord gas safety inspections
- Planned servicing and maintenance programmes
- Gas Safe registered contractors
- Carbon monoxide risk management
- Contractor competence assurance
- Resident access procedures
- Emergency response arrangements
- Regular compliance reporting
- Internal audit and independent assurance
- Board oversight of statutory compliance and landlord safety performance

Where legislation, Approved Codes of Practice or recognised industry guidance are revised, the Trust will review this policy and associated procedures to ensure continued compliance and adoption of best practice.

1. Roles and Responsibilities

1.1 Organisational Structure

The Trust's organisational structure for gas safety is set out within the current organisational structure approved by the Board.

The Trust recognises the distinction between the **Duty Holder**, **Responsible Persons** and **Competent Persons** as defined within the **Gas Safety (Installation and Use) Regulations 1998**, the **Health and Safety at Work etc. Act 1974** and associated Health and Safety Executive (HSE) guidance.

Overall accountability for gas safety rests with the **Chief Executive Officer (CEO)**, who acts as the organisational Duty Holder.

Operational responsibility is delegated through the **Director of Operations**, supported by the **Head of Property & Compliance**, who is appointed by the Chief Executive Officer as the Trust's **Gas Responsible Person**.

The Trust will ensure that individuals appointed to manage gas safety have the appropriate authority, competence, training and resources to discharge their responsibilities effectively.
The Trust's arrangements include:

- The **Chief Executive Officer** as the organisational Duty Holder with overall accountability for gas safety.
- The **Director of Operations** providing strategic oversight of the Trust's Gas Safety Management System.
- The **Head of Property & Compliance** acting as the Trust's **Gas Responsible Person**, responsible for

the day-to-day implementation of the Gas Safety Management System and statutory compliance.

- The **Head of Estates & Facilities** supporting the management of gas safety associated with communal buildings, estate infrastructure, plant rooms and operational facilities.
- A suitably qualified **Health & Safety Adviser** providing competent independent advice on gas safety legislation, risk management and continuous improvement.
- Competent **Gas Safe registered contractors** appointed to undertake gas safety inspections, servicing, maintenance, repairs, installations and emergency works.
- Managers and employees undertaking gas-related duties only where they have received appropriate information, instruction, training and supervision.

The table below summarises this information.

Role	Responsibility
Duty Holder	**Chief Executive Officer** – overall accountability for statutory compliance and organisational assurance.
Strategic Lead	**Director of Operations** – strategic oversight of landlord compliance, governance, performance and assurance
Responsible Person	**Head of Property & Compliance** – operational responsibility for implementing the relevant compliance management system, maintaining statutory compliance and reporting performance.
Operational Support	**Head of Estates & Facilities** – management of operational activities, estate infrastructure and contractor coordination.
Competent Person	**Health & Safety Adviser** – independent professional advice, monitoring, audit and legislative guidance.
Specialist Contractors	**Competent external contractors** accredited or registered in accordance with statutory and industry requirements to undertake specialist inspection, testing, servicing, maintenance and remedial works.
Governance Oversight	**Board of Trustees** – strategic oversight, scrutiny and assurance regarding statutory landlord compliance and organisational risk.

The Trust adopts a **whole organisation approach** to gas safety, recognising that effective management requires collaboration across all departments to protect residents, employees, contractors, volunteers and visitors.

The competence of those undertaking gas safety duties will be reviewed regularly to ensure that training, continuing professional development and contractor performance remain effective and reflect current legislation and recognised industry best practice.

Duty Holder - Chief Executive Officer (CEO)

The Chief Executive Officer is the Trust's Duty Holder and has overall accountability for ensuring the Trust complies with all statutory and regulatory requirements relating to gas safety.

Whilst operational responsibilities may be delegated, accountability for compliance cannot be delegated and remains with the Chief Executive Officer. The CEO is responsible for ensuring:

- This policy is implemented, adequately resourced and reviewed annually

- Suitable governance arrangements are maintained for gas safety management
- A competent Gas Responsible Person is formally appointed
- Sufficient financial, technical and operational resources are available to maintain statutory compliance
- Appropriate arrangements are in place to inspect, service, maintain and monitor all gas installations under the Trust's responsibility
- Significant gas safety risks are escalated appropriately
- The Board receives regular assurance regarding gas safety compliance and performance
- Gas safety remains an integral part of the Trust's wider Building Safety, Asset Management and Health and Safety Management Systems.

Director of Operations (Health & Safety Officer)

The Director of Operations acts as the Trust's Health & Safety Officer and provides strategic oversight of the Trust's Gas Safety Management System. Responsibilities include:

- Monitoring compliance with this policy
- Ensuring gas safety is embedded within the trust's health and safety management system
- Providing strategic oversight of landlord gas compliance;
- Reviewing significant gas safety incidents, investigations and lessons learned
- Ensuring corrective actions arising from audits, inspections and investigations are implemented
- Commissioning independent audits where appropriate
- Maintaining oversight of strategic gas safety risks
- Reporting gas safety compliance, performance and significant risks to the executive leadership team, resident experience and community committee and Board
- Supporting continual improvement of the Trust's gas safety arrangements.

Head of Property & Compliance (Responsible Person)

The Head of Property & Compliance is appointed by the Chief Executive Officer as the Trust's Gas Responsible Person and has delegated responsibility for the day-to-day management of gas safety across the Trust's property portfolio.

Acting on behalf of the Duty Holder, the Gas Responsible Person shall ensure gas safety risks are effectively identified, assessed, managed, monitored and reviewed so far as is reasonably practicable.

Responsibilities include:

- Maintaining the Trust's Gas Asset Register and ensuring it remains accurate, current and readily accessible
- Maintaining and implementing the Trust's Gas Safety Management Plan
- Ensuring annual landlord gas safety inspections are completed within statutory timescales
- Ensuring valid Landlord Gas Safety Records (LGSRS) are obtained for all applicable properties
- Ensuring gas appliances, flues, pipework and associated installations are serviced, inspected and maintained in accordance with legislation and manufacturers' recommendations
- Ensuring all gas work is undertaken by competent Gas Safe registered engineers

- Commissioning and managing gas servicing, maintenance and installation contractors
- Ensuring remedial works identified through inspections or servicing are completed within agreed risk-based timescales
- Ensuring gas safety associated with communal heating systems, plant rooms, boiler houses, commercial kitchens, workshops and estate infrastructure is effectively managed
- Reviewing and approving contractor risk assessments and method statements (RAMS) before gas works commence
- Ensuring contractors are provided with relevant gas safety information before commencing work
- Managing gas safety risks associated with planned maintenance, estate improvement works and capital projects
- Ensuring permit-to-work arrangements are implemented where appropriate
- Maintaining accurate records of inspections, servicing, repairs, appliance replacements and certification
- Ensuring gas safety information is accurately maintained within the trust's compliance management system
- Monitoring contractor competence and performance
- Ensuring carbon monoxide safety measures, including alarms where required, are maintained and monitored
- Supporting investigations into gas safety incidents, gas escapes, carbon monoxide incidents or dangerous occurrences
- Providing quarterly compliance reports to the director of operations

Head of Estates & Facilities (Responsible Person - External Areas)

The Head of Estates & Facilities is responsible for supporting the safe management of gas installations associated with communal buildings, estate infrastructure, operational facilities and plant. Responsibilities include:

- Ensuring contractors are provided with relevant gas safety information before commencing work
- Managing gas safety risks associated with estate improvement works and projects
- Ensuring permit-to-work arrangements are implemented where appropriate
- Reporting suspected gas defects or unsafe installations immediately to the gas responsible person
- Supporting investigations into gas safety incidents and implementing lessons learned
- Working collaboratively with the Gas Responsible Person to maintain accurate compliance records

Health & Safety Adviser (HSA) – Competent Person

The Trust's appointed Health & Safety Adviser acts as the competent person for gas safety, providing independent professional advice and assurance. The Health & Safety Adviser will, through the Director of Operations:

- Provide competent advice on gas safety legislation, Approved Codes of Practice and recognised industry guidance
- Support implementation and periodic review of this policy
- Monitor emerging legislation, regulatory requirements and recognised industry best practice

- Assist in reviewing the Trust's Gas Safety Management Plan and associated procedures
- Support investigations into gas safety incidents, gas escapes, carbon monoxide incidents and dangerous occurrences;
- Advise on RIDDOR reportability where applicable;
- Support internal audits and independent compliance reviews;
- Assist in maintaining the trust's corporate health and safety risk register;
- Monitor implementation of corrective actions arising from audits, inspections and investigations;
- Promote continuous improvement in gas safety management across the organisation.

Head of Housing and Huntley House Registered Manager

Although the Housing Team is not responsible for statutory gas safety compliance, it plays a vital role in supporting the effective management of gas safety within residents' homes. Responsibilities include:

- Supporting access to residents' homes for annual gas safety inspections, servicing and remedial works;
- Identifying and reporting gas safety concerns raised by residents;
- Sharing relevant information regarding vulnerable residents where appropriate to support safe management arrangements;
- Supporting communication with residents before planned gas servicing or repairs;
- Supporting temporary decants where emergency gas safety works require residents to vacate their homes;
- Reinforcing resident responsibilities regarding access for annual gas safety inspections and the reporting of gas leaks, carbon monoxide alarm activations or appliance faults.

Heads of Departments (HODs)

Heads of Departments are responsible for ensuring gas safety risks are effectively managed within the buildings, services and activities under their control. Responsibilities include:

- Ensuring employees understand and comply with this policy and associated procedures
- Ensuring employees report suspected gas leaks, damaged appliances or carbon monoxide concerns immediately
- Ensuring employees know how to respond safely in the event of a gas emergency
- Supporting access for gas inspections, servicing and remedial works
- Ensuring employees complete mandatory gas safety awareness training where required
- Supporting investigations into gas safety incidents
- Implementing agreed corrective actions within required timescales
- Working collaboratively with the property team to minimise disruption during gas servicing and maintenance activities

As part of the HODs monthly meeting, the group will:

- Review gas safety compliance performance and significant incidents;
- Monitor completion of annual gas safety inspections and servicing programmes;

- Review outstanding high-risk remedial actions;
- Consider lessons learned from audits, inspections and incidents;
- Review emerging risks and changes in legislation or guidance;
- Escalate significant gas safety risks or overdue high-risk actions to the Executive Leadership Team and Board where appropriate.

All Employees, Contractors & Volunteers

Everyone working for or on behalf of the Trust has a responsibility to contribute to maintaining a safe gas environment and to comply with this policy and associated procedures. Everyone must:

- Take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions
- Comply with this policy and associated procedures
- Complete mandatory gas safety awareness training where required by their role
- Report suspected gas leaks, appliance faults, damaged flues or carbon monoxide alarm activations immediately
- Never attempt to repair or interfere with gas appliances or installations unless competent and authorised to do so
- Co-operate with gas safety inspections, servicing and maintenance activities
- Follow the trust's emergency procedures in the event of a suspected gas leak or carbon monoxide incident

Contractors must:

- Comply with the Trust's Contractor Management Policy
- Maintain valid Gas Safe registration appropriate to the work being undertaken
- Provide evidence of competence, qualifications and insurance
- Comply with approved Risk Assessments, Method Statements and permit-to-work arrangements
- Notify the Trust immediately of any unsafe gas installation or appliance and any appliance or pipework that has been condemned and/or isolated.
- Provide all statutory certification and commissioning documentation following completion of works

Trustees

The Board of Trustees has overall responsibility for ensuring that appropriate governance arrangements are in place to effectively manage landlord health and safety compliance, including gas safety. Trustees are responsible for:

- Promoting a positive culture of health, safety and compliance throughout the Trust
- Ensuring gas safety risks are effectively identified, assessed and managed
- Receiving regular assurance regarding statutory gas safety compliance and organisational performance

- Ensuring sufficient financial, operational and technical resources are available to maintain compliance
- Scrutinising performance and challenging areas of non-compliance or emerging risk
- Monitoring compliance with relevant legislation and the Regulator of Social Housing's Safety and Quality Standard
- Supporting continuous improvement through review of audits, incidents, resident feedback and lessons learned
- Ensuring gas safety remains an integral component of the Trust's overall landlord compliance framework and strategic risk management arrangements

2. Gas Safety Management System

2.1 Gas Safety Management System

The Trust operates a comprehensive Gas Safety Management System designed to ensure that all gas installations, appliances, flues and associated systems under its control are safely managed throughout their operational life.

The Gas Safety Management System is based upon the principles of continual improvement (**Plan – Do – Check – Act**) and forms part of the Trust's wider Health and Safety Management System, Asset Management Strategy and Landlord Compliance Framework.

The Trust recognises that gas safety is an ongoing management process requiring robust governance, competent personnel, planned maintenance, accurate asset information, resident engagement and independent assurance.

The Gas Safety Management System comprises:

- Clearly defined governance and accountability arrangements
- Competent responsible persons and specialist contractors
- Comprehensive gas asset information
- Annual landlord gas safety inspections
- Planned servicing and preventative maintenance programmes
- Responsive repairs and emergency arrangements
- Gas appliance replacement programmes
- Carbon monoxide risk management
- Contractor competence assurance
- Resident communication and access arrangements
- Audit and assurance
- Board oversight and performance reporting

2.2 Objectives

The Trust's Gas Safety Management System aims to:

- Protect residents, employees, contractors, volunteers and visitors from gas-related risks
- Maintain safe gas installations throughout the trust's housing stock and workplaces
- Achieve 100% compliance with annual landlord gas safety inspection requirements
- Minimise disruption through proactive maintenance
- Maintain accurate gas asset records
- Identify defects before they present a safety risk
- Promote continual improvement through monitoring, audit and learning from incidents

2.3 Plan – Do – Check – Act

The Trust adopts the internationally recognised **Plan – Do – Check – Act (PDCA)** model for managing water safety.

Plan

The Trust will:

- Maintain a complete gas asset register;
- Programme annual inspections;
- Assess gas safety risks;
- Identify vulnerable residents;
- Allocate responsibilities and resources.

Do

The Trust will:

- Undertake annual inspections
- Service appliances
- Complete repairs
- Replace obsolete equipment
- Maintain carbon monoxide protection
- Provide training

Check

The Trust will:

- Monitor compliance
- Audit contractors
- Investigate incidents
- Review KPIs
- Monitor access performance

Act

The Trust will:

- Implement lessons learned;

- Revise procedures;
- Update risk assessments;
- Improve contractor performance;
- Review investment programmes.

3. Gas Servicing and Safety Inspections

The Trust will ensure all landlord-owned gas appliances, flues, chimneys and associated pipework are inspected and tested at intervals not exceeding twelve months.

All inspections shall be undertaken by suitably qualified engineers registered with the **Gas Safe Register** and holding the relevant competencies for the type of installation being inspected.

The Trust will maintain a rolling inspection programme to ensure all statutory inspections are completed before expiry of the previous Landlord Gas Safety Record.

The Trust will carry out an audit process via an independent third party to re inspect/service 5% of all appliances serviced each year to quality check.

3.1 Landlord Gas Safety Records

Following every inspection the Trust shall obtain a valid Landlord Gas Safety Record (LGSR). Copies shall be:

- Provided to new residents before occupation
- Provided to existing residents within statutory timescales
- Retained electronically
- Linked to the trust's compliance management system

3.2 Defects

Where inspections identify defects they shall be categorised and managed according to risk.

Immediate action shall be taken where appliances are classified as:

- **Immediately Dangerous (ID)**
- **At Risk (AR)**

Appliances classified as Immediately Dangerous shall not remain in service.

4. Planned Maintenance and Gas Asset Management

The Trust will maintain a planned preventative maintenance programme covering:

- Boilers
- Warm air units
- Water heaters

- Commercial catering equipment
- Communal heating plant
- Gas pipework
- Flues
- Ventilation systems

Gas assets shall be replaced based upon:

- Age
- Condition
- Reliability
- Manufacturer recommendations
- Lifecycle planning
- Risk

The Trust will maintain a comprehensive Gas Asset Register to support long-term investment planning.

5. Carbon Monoxide Safety

The Trust recognises carbon monoxide as one of the most significant risks associated with gas installations. The Trust will ensure:

- Carbon monoxide alarms are installed where required by legislation;
- Alarms are tested during annual inspections;
- Residents receive advice regarding carbon monoxide;
- Defective alarms are replaced promptly.

Where carbon monoxide alarms activate:

- Residents shall be advised to contact the National Gas Emergency Service immediately if a gas appliance is suspected
- The Trust shall arrange attendance by a Gas Safe engineer
- Affected appliances shall remain isolated until declared safe

6. Responsive Repairs and Gas Escapes

The Trust operates a 24-hour emergency response service for gas-related emergencies.
Gas escapes shall receive an immediate emergency response. Where notified of:

- Smell of gas
- Suspected carbon monoxide
- Damaged gas installations
- Unsafe appliances

the Trust shall:

- Advise residents to contact the National Gas Emergency Service (0800 111 999) immediately
- Arrange attendance by a competent contractor

- Support vulnerable residents where required
- Make safe the installation

7. Contractor Management

Only contractors appropriately registered with the Gas Safe Register shall undertake gas work on behalf of the Trust. The Trust will verify:

- Gas Safe registration
- Competencies
- Insurance
- Qualifications
- Training
- Contractor performance

Contractors shall:

- Comply with RAMS
- Comply with permit-to-work procedures where applicable
- Provide certification
- Report unsafe installations immediately

8. New Installations, Refurbishment and Alterations

All new gas installations shall:

- Comply with current legislation
- Be installed by gas safe registered engineers
- Be commissioned appropriately
- Include operating information
- Include certification

Gas installations within listed buildings shall be designed sympathetically whilst maintaining statutory safety standards.

9. Resident Information and Responsibilities

Residents will receive guidance regarding:

- Annual servicing
- Carbon monoxide safety
- Recognising gas leaks
- Emergency procedures
- Providing access

Residents should:

- Report faults promptly
- Report gas smells immediately
- Test carbon monoxide alarms where instructed
- Allow access for inspections

Residents must not:

- Alter gas installations
- Disconnect appliances
- Remove flues
- Interfere with meters

without written approval.

10. Training and Competence

The Trust will ensure:

- Managers understand gas safety responsibilities
- Employees receive gas safety awareness training where appropriate
- Responsible persons receive specialist training
- Refresher training is completed periodically

Training compliance shall be monitored through the Corporate Training Matrix.

11. Incident Management and Emergency Procedures

The Trust will investigate all significant gas incidents including:

- Gas escapes
- Carbon monoxide incidents
- Fires involving gas installations
- Dangerous occurrences
- Contractor failures

Where required the Trust shall notify:

- HSE
- Gas Safe Register
- Fire & Rescue Service
- Regulator of Social Housing

Lessons learned shall be incorporated into future management arrangements.

12. Monitoring, Audit and Performance Review

The Trust will monitor gas safety performance through:

- Compliance reporting
- Contractor audits
- Internal audit
- Independent review
- Board reporting

Performance shall be reviewed at least quarterly by the Executive Leadership Team and reported to the Resident Experience and Community Committee and Board.

The Trust adopts the principles of continual improvement and will use audit findings, incidents, resident feedback and lessons learned to strengthen water safety arrangements.

13. Three Lines of Assurance

The Trust adopts a Three Lines of Assurance model to provide confidence that water safety risks are being effectively managed.

First Line – Operational Management

Operational assurance is provided through:

- Annual inspections
- Planned servicing
- Responsive repairs
- Contractor supervision
- Asset management
- Resident communication

Second Line – Independent Oversight

Independent assurance is provided through:

- Health & Safety Adviser
- Gas Safe registered contractors
- Internal audit
- Contractor performance monitoring
- Compliance reporting
- Independent third party audit process

Third Line – Governance

Strategic assurance is provided through:

- Executive Leadership Team
- Resident Experience and Community Committee
- Board scrutiny
- External audit where commissioned

- Regulatory inspection

This approach provides assurance that gas safety risks are effectively governed, independently verified and continuously improved.

14. Policy Implementation and Review

This policy shall be communicated to all relevant employees and made available through the Trust's document management system.

Managers are responsible for ensuring the requirements of this policy are implemented within their areas of responsibility and that evidence of compliance is maintained.

The Director of Operations shall review this policy at least annually, or sooner where:

- Legislation changes
- Approved codes of practice or guidance are revised
- Significant gas incidents occur
- Enforcement action is taken
- Audit findings identify opportunities for improvement
- Organisational changes affect management responsibilities

The Director of Operations is responsible for ensuring revisions are communicated throughout the organisation.