

Gas Safety Management Policy

For council housing and other HRA properties

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Document Control

Governance

Table 1 – Policy information

Item	Response
Title	H&N Gas Safety Management Policy
Responsible officer	H&N Head of Repairs & Maintenance
Author	Steve Hughes - H&N Service Manager – M&E
First approved	Head of Repairs & Maintenance 01/10/2019
Version approved	HNSLT 04/03/2026
Next review date	04/03/2027
Review responsibility	H&N Service Manager – M&E
Applicable to	Kirklees Homes and Neighbourhoods staff and subcontractors Kirklees Homes and Neighbourhoods tenants and leaseholders
Regulatory framework	Social Housing (Regulation) Act 2023 and associated RSH Regulatory Standards . Health and Safety at Work Act 1974

Revision history

Table 2 – Revision details

Date	Version	Author	Authorised by	Revision details
Oct 2019	1.0	SH	Head of Repairs & Maintenance	First publication
Mar 2022?	2.0	SH	Head of Repairs & Maintenance	Updated to align with Kirklees Council policy and terminology, and to reflect legal and regulatory requirements.
2023-2025	2.1-2.3	SH	Head of Repairs & Maintenance	Annual reviews with minor or no amendments.
04/03/2026	3.0	SH	HNSLT	Reformatted to meet Kirklees Council's document accessibility

Date	Version	Author	Authorised by	Revision details
				standards. Sections added on tenant responsibilities (aligned with Tenancy Agreement) and reporting gas repairs (aligned with R&M policy). Additional paragraph re. understanding specific tenants' needs (aligned with Vulnerable Tenant Policy).

1 Introduction

1.1 Purposes of this policy

- 1.1.1 This policy sets out Kirklees Council's commitments to meeting its gas safety obligations as a landlord, and identifies key responsibilities within the organisation.
- 1.1.2 The document outlines the standards required for gas safety, installation, maintenance and testing to ensure that risks are suitably assessed and effectively eliminated to minimise the likelihood of a gas incident occurring e.g. gas escape, explosion, damage to property, injury and or death. This includes the identification and implementation of appropriate control measures and the provision of information to any person who may work on or with gas installations and equipment.
- 1.1.3 The policy seeks to provide assurance that gas safety is effectively managed to ensure the safety of employees, contractors, tenants, leaseholders, and members of the public.
- 1.1.4 The policy also sets out tenant responsibilities in relation to gas safety.

1.2 Legal context

- 1.2.1 This policy responds to the [Social Housing \(Regulation\) Act 2023](#) and the associated [Regulatory Standards](#) by addressing the following requirements:

Safety and Quality Standard

- Registered providers must use data from across their records on stock condition to inform their provision of good quality, well maintained and safe homes for tenants including:
 - a) compliance with health and safety legal requirements
- Registered providers must identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas

- Registered providers must ensure that all required actions arising from legally required health and safety assessments are carried out within appropriate timescales.
- Registered providers must ensure that the safety of tenants is considered in the design and delivery of landlord services and take reasonable steps to mitigate any identified risks to tenants

1.2.2 This policy also aims to ensure compliance with the following legislation and guidance:

- Health and Safety at Work etc. Act 1974
- Workplace (Health, Safety & Welfare) Regulations 1992 (as amended)
- Gas Safety (Installation & Use) Regulations 1998
- HSE Guidance INDG 285 – A Guide to Landlords duties: Gas Safety (Installation and Use) Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health (COSHH) Regulations 2002
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
- Construction (Design and Management) Regulations 2015
- Awaab’s Law: The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025
- The Gas Industry Unsafe Situations Procedure with July 2025 amendments
- British Standards and IGEM (Institute of Gas Engineers & Management), IGE (Institute of Gas Engineers) publications
- Building Regulations

1.3 Definitions

1.3.1 For the purposes of this policy, the following definitions apply:

Table 3 – List of definitions used in this policy

Term	Definition
Homes & Neighbourhoods; H&N	Kirklees Council’s housing management services, inclusive of all departments and teams.
Tenant	A person that rents a home from Homes & Neighbourhoods.
Leaseholder	A person that owns a home on a lease, within a council-owned building.
Resident	Any person that is registered as living in a council-owned home or other building, including tenants, leaseholders and others.

Term	Definition
Staff; Officer; Employee	A person that works for Kirklees Council, including temporary or agency workers and apprentices.
Contractor; Subcontractor	A company or person that works on behalf of Kirklees Council.

2 Objectives and scope

2.1 Policy objectives

- 2.1.1 This policy aims to ensure that we meet our obligations as a landlord and seeks to provide assurance that gas safety is effectively managed to ensure the safety of our employees, contractors, tenants, leaseholders and members of the general public.
- 2.1.2 The policy aims to provide clarity on the council's overall approach to gas safety, assuring tenants and other stakeholders that our approach to gas safety is robust and effective.

2.2 Policy scope

- 2.2.1 The policy covers all properties owned or managed by Kirklees Homes and Neighbourhoods.
- 2.2.2 The policy applies to leasehold properties to the extent set out in the lease agreement.
- 2.2.3 This policy is aimed at all Homes & Neighbourhoods employees and contractors who have responsibility for or may come into contact with gas systems or equipment during their normal work activities.
- 2.2.4 It should be read and understood by all parties who have responsibilities within and a duty of care under the Health & Safety at Work Act 1974 and the Gas Safety (Installation & Use) Regulations 1998.
- 2.2.5 Pinnacle Housing, who manage some homes on behalf of the council, are required to provide assurance that the landlord's gas safety obligations are being met. Separate arrangements are in place and maintained to ensure this.

3 Policy statement

3.1 Kirklees Council's commitments

3.1.1 H&N is responsible for the maintenance and repair of circa 22,100 domestic and non-domestic premises owned by Kirklees Council. As a responsible social landlord, H&N is committed to minimising the risks associated with gas safety and ensuring that all our gas safety works, including installation, maintenance and testing, are carried out in compliance with the Gas Safety (Installation and Use) Regulations 1998 and other regulatory and industry body requirements.

3.1.2 Homes & Neighbourhoods will:

- Invest in a programme of maintenance, renewal, testing and upgrading gas installations across H&N, in accordance with industry guidance and manufacturers' recommendations.
- Ensure that all gas installations are tested and certified prior to the letting of H&N properties
- Assess each gas maintenance, upgrade and renewal scheme to ensure that the correct priority level is allocated. H&N will take specific account of each vulnerable tenant's requirements during the prioritisation process for these works
- Ensure that all H&N employees and external contractors carrying out gas installation, maintenance and testing have valid individual registrations with Gas Safe.
- Ensure that each individual mechanical engineer is trained, competent and holds relevant industry recognised qualifications.
- Maintain a clear set of gas safety procedures that are reviewed annually or sooner if there are any changes to legislation or working practices.
- Provide premises gas systems and installation information to H&N employees and external contractors to enable them to work safely.
- Undertake regular gas safety audits.
- Communicate to other persons that they have a duty to co-operate as far as is necessary to allow H&N to comply with the above requirements.

3.1.3 Homes & Neighbourhoods will work with tenants on an individual basis to understand their specific circumstances, including information about any communication needs, disabilities, or vulnerabilities. Gas safety services and arrangements will be delivered in a way that considers and respects tenants' individual needs, in line with the H&N Vulnerable Tenant Policy.

4 Roles and responsibilities

4.1 Council responsibilities

4.1.1 The Building Safety Assurance Board will:

- Review this policy on an annual basis.
- Analyse quarterly performance reports to ensure that issues of significant risk are actioned appropriately.
- Ensure suitable and sufficient resources are made available for the Management of Gas Safety in compliance with our legal duties.

4.1.2 The H&N Head of Repairs and Maintenance:

- Accept responsibility as the designated 'Responsible Person' and be ultimately responsible for the implementation of this policy.
- Assume overall responsibility for the management of gas safety for and on behalf of H&N.
- Ensure suitable and sufficient resources are made available for the Management of Gas Safety in compliance with our legal duties.
- Appoint a competent Gas Safety Responsible Person (GSRP) and Deputy GSRP in writing.
- Validate the competence of the Gas Safety Responsible Person (GSRP) and Deputy GSRP, before they are appointed in writing and thereafter on an annual basis, to ensure that they have sufficient authority, competence, training, knowledge and understanding to provide competent advice and guidance regarding gas safety across the H&N property portfolio to help H&N maintain full statutory compliance

4.1.3 The H&N Heads of Service will:

- Ensure the policy is implemented within their services
- Ensure suitable and sufficient resources are made available within their services for the management of Gas Safety in compliance with our legal duties
- Participate in a programme of Safety, Health and Environmental "Senior Leadership Team (SLT) walkabouts" to include Gas Safety.
- Discuss compliance with gas safety at H&N Senior Leadership Team meetings. The H&N Safety, Health and Environmental (SHE) Manager will:
- Ensure robust procedures are in place in the Gas Safety Management System so that H&N always maintains full statutory compliance.
- Work in conjunction with the Building Safety Team to monitor and audit gas safety compliance across H&N.

4.1.4 The HN Gas Safety Responsible Person (GSRP) and Deputy GSRP will:

- Act as the Competent Persons for managing and preventing any foreseeable risk from exposure to gas across the HN property portfolio.
 - Provide competent advice and guidance to help HN maintain full statutory compliance
 - Work in partnership with the HN Head of Assets and Building Safety, Head of Operations, Head of Building Safety and SHE Manager to develop, implement and maintain a robust Gas Safety Management System across the HN property portfolio.
 - Ensure that a programme of gas servicing checks is carried out annually, or earlier if there is a change of tenancy and that gas safety records are maintained and retained
 - Ensure that the competence of all persons who conduct gas installation, maintenance and testing have been assessed and deemed to have the required knowledge, skills, experience, training, qualifications to conduct such works in compliance with all statutory requirements.
 - Ensure that HN workers are provided with the correct equipment, that is clean, in good working order, suitable and sufficient for the work activity and are trained to use the equipment safely.
 - Investigate any gas safety incidents; ensuring that a root cause analysis is conducted with suitable and sufficient additional control measures identified and implemented to eliminate / reduce the likelihood of a reoccurrence to as low as is reasonably practicable.
 - Review and update the gas compliance database on a weekly basis and escalate any concerns to the H&N GSRP, Deputy GSRP, Head of Repairs and Maintenance, SHE Manager and the Service Director for H&N immediately.
 - Communicate lessons learnt to all relevant persons in a timely manner.
 - Consult the Safety, Health and Environmental Team and Building Safety Team for advice and guidance as required.
- 4.1.5 Members of H&N Repairs and Maintenance Service, external gas contractors and sub-contractors will ensure that:
- All maintenance, installations and servicing programmes are planned and managed in accordance with the Gas Safety (Installation and Use) Regulations 1998 (SI 1998 No 2451)(GSIUR) and The Health and Safety at Work Act 1974.
 - All instances of non-conformance are recorded and reported in accordance with the Gas Industry Unsafe Situations Procedure 7th Edition (GIUSP).
 - Gas Safe registration is maintained, as required by the HSE.
 - Work in partnership with the H&N GSRP, Deputy GSRP, SHE Manager and Building Safety Team to develop and implement a Gas Safety Management System for all premises under the direct control of H&N.
 - All employees, contractors and sub-contractors follow the gas procedures documented in the H&N Gas Safety Management System.
 - All roles and responsibilities are clearly defined in writing.
 - All employees under their control are suitably trained, supervised and work safely at all times, in accordance with all instructions and procedures issued to them.

4.1.6 The H&N Safety, Health and Environmental (SHE) Team will:

- Provide competent health, safety and environmental support, advice and coordination across the organisation, ensuring policies and procedures are in place so that H&N remains compliant with all relevant legislation.
- Work in partnership with the HN GSRP and Deputy GSRP to develop and implement a robust Gas Safety Management System for all premises under the direct control of H&N.
- Ensure all accidents, incidents and near misses are correctly reported and investigated in accordance with HSE and H&N policies and procedures.

4.1.7 The H&N Building Safety Team will:

- Collate data and prepare quarterly compliance reports that incorporate gas safety for submission to the H&N Service Director and Senior Leadership and Management Teams.
- Conduct a programme of audits to ensure that up to date information is maintained and retained in the Gas Safety Management System and that all actions identified within the risk assessments and the inspection and audit programme have been completed, signed off and recorded.
- Monitor and audit gas safety compliance against agreed KPIs for the management of gas safety across H&N.
- Prepare gas safety guidance information for tenants in an appropriate format.

4.1.8 All H&N staff will:

- Familiarise themselves with this policy – employees have a duty of care to themselves, their colleagues, contractors, residents and members of the public.
- Attend relevant training courses as and when required.
- Immediately report incidents or concerns to the H&N GSRP, Deputy GSRP, Head of Repairs and Maintenance or the SHE Team to enable appropriate action to be taken.
- Contribute and co-operate with the council on matters of safety; any concerns must be discussed with their manager.

4.2 Tenant responsibilities

4.2.1 Tenants must allow access to their homes for gas safety checks, servicing, repairs and other works to be carried out, in line with the Tenancy Agreement.

4.2.2 Tenants are responsible for taking good care of their homes and reporting any potential damage as soon as they notice it.

4.2.3 Tenants are responsible for gaining permission from Kirklees Homes & Neighbourhoods before undertaking any home improvements to their homes, with the exception of decorating.

4.3 Reporting gas repairs

- 4.3.1 **Gas leaks should be reported to the National Gas Emergency Service on 0800 111 999.**
- 4.3.2 Tenants should report repairs as soon as possible to prevent further damage and ensure that their home remains in good condition.
- 4.3.3 The best way for tenants and leaseholders to report repairs, including non-emergency gas repairs, is directly through their [My Kirklees account](#). This is available 24 hours a day, seven days a week.
- 4.3.4 For people that are unable to access this service online, other options are available:
- Call Housing Repairs (Kirklees Direct) on [01484 414800](tel:01484414800) between 8am - 6pm.
 - Email details of the repair to housing.direct@kirklees.gov.uk
 - Council staff can report repairs on behalf of tenants by using an [internal online form](#).
- 4.3.5 For out-of-hours emergency repairs (6pm onwards), please contact Housing Repairs on 01484 414850. This service is only available for situations that pose an immediate danger to tenants, other individuals, or risk serious damage to the property or neighbouring properties. In such cases, a temporary repair may be carried out to make the home safe, with any follow-up repairs scheduled as either urgent or routine, depending on the situation.
- 4.3.6 Information on [how to report repairs](#) is provided to new tenants at the start of their tenancies and is also available to view on the council's website.
- 4.3.7 If any council staff or contractors are made aware of any potential emergency or significant repair hazard in tenants' homes, they should immediately report it through the methods above.

4.4 Gas safety incidents

- 4.4.1 All gas incidents must be reported via the Claim Control System to the H&N SHE and Compliance Teams, who will ensure that the HSE is notified in accordance with the Reporting of Incidents, Diseases and Dangerous Occurrence Regulations 2013 (RIDDOR) in the event of a work-related reportable injury, specified dangerous occurrence or occupational disease.
- 4.4.2 All gas incidents will be investigated in a timely manner with a root cause analysis conducted and lessons learnt communicated to all relevant persons.
- 4.4.3 The main hazards associated with this policy are:
- Gas escapes.

- Fire or explosion where gas escape could be the source of ignition in a potentially flammable or explosive atmosphere.
- Carbon monoxide poisoning from a leak of products of combustion.
- Inadequate or deficient gas appliances, pipework or flues (ducts or compartments).
- Pipe strikes during excavation works.
- Non-compliance with regulatory or industry standards.

5 Monitoring and review

5.1 Monitoring and improvement

- 5.1.1 Monitoring gas safety and updating risk assessments are an integral part of the Control of Gas Safety Management System.
- 5.1.2 A system of formal audit (internal and/or external) of the Gas Safety Management System must be in place to ensure that both policy and procedures are being implemented.
- 5.1.3 The Gas Management Team will maintain an on-going audit plan to address the management of gas safety, reporting key findings to the Head of Repairs and Maintenance, the Service Director for H&N and the Building Safety Assurance Board.
- 5.1.4 Where the Head of Repairs and Maintenance or appointed competent person(s) have reason to believe that the Gas Safety Management System is not achieving the aims of this policy, the Service Director for H&N and the SHE Manager shall be notified, and a review of the system shall be carried out. If the review identifies deficiencies, the Head of Operations shall take action to amend the system as required.

5.2 Policy review

- 5.2.1 The policy will be reviewed annually, or in response to relevant changes in legislation, regulation or organisational structures.
- 5.2.2 Any significant changes will be consulted on prior to implementation and relevant approvals sought.

5.3 Publication and communication

- 5.3.1 This policy and future updates will be published on the council's website.

5.3.2 Gas Safety Guidance information is available for tenants in appropriate formats, including on the Homes & Neighbourhoods pages of Kirklees Council's website.

5.3.3 This policy, and any subsequent amendments, will be shared with employees and contractors through induction and training. These may be provided in alternative formats or languages, as required.

6 Associated policies and strategies

6.1 Homes & Neighbourhoods policies

6.1.1 The following Homes & Neighbourhoods policies and other documents are relevant:

- Homes & Neighbourhoods Tenancy Agreement
- Homes & Neighbourhoods Repairs & Maintenance Policy
- Homes & Neighbourhoods Vulnerable Tenant Policy
- Homes & Neighbourhoods Gas Safety Management System