



RCH Policy Gas Safety: 2026 - 2028

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Approval Body	Board
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This policy is available, on request, in different languages and in other formats such as large print, audio format and braille as required.

1. Scope

This is a River Clyde Homes (RCH) policy and therefore applies to RCH Staff, Board and Committee members of RCH. This Gas Safety Policy document establishes the comprehensive framework for managing gas safety across all River Clyde Homes (RCH) properties and operations. It applies to all RCH Staff, Board Members, Committee Members, contractors, and relevant third-party service providers involved in delivering, managing, and overseeing gas-related services.

1.2 The policy covers all aspects of gas safety management including but not limited to:

- Annual landlord gas safety checks and certification
- Installation, servicing, and maintenance of gas appliances and systems
- Emergency gas safety response procedures
- Contractor qualification, selection, and performance management
- Tenant engagement and communication regarding gas safety
- Compliance monitoring, reporting, and continuous improvement
- Risk assessment and management of gas-related hazards
- Carbon monoxide detection and monitoring
- Record keeping and compliance documentation

1.3 This policy is designed to protect tenants, staff, contractors, visitors, and members of the public who may be affected by gas-related activities in properties owned or managed by RCH. It establishes clear responsibilities, processes, and standards to ensure consistent application of gas safety practices across the organisation.

1.4 Gas safety represents one of the most critical compliance areas for registered social landlords in Scotland. Failure to maintain rigorous gas safety standards can result in serious harm to individuals, substantial regulatory penalties, reputational damage, and, in extreme cases, criminal prosecution. This policy, therefore, serves as a cornerstone document within RCH's wider health and safety and compliance framework.

2. Introduction

2.1 This Gas Safety Policy ensures that:

RCH fully complies with all legal requirements and current gas legislation including the Gas Safety (Installation and Use) Regulations 1998 and the Gas Safety (Installation and use) (Amendment) Regulations 2018.

2.2 Reporting on key performance indicators (KPIs) identified, will be reported to the Social Landlords Operations Committee (SLOC) as part of our KPI reporting.

2.3 This policy sets out:

- The Purpose for which it will be used
- The line management responsibility
- River Clyde Homes' statement of intent
- How River Clyde Homes will review the policy

2.4 RCH has also prepared relevant documents available to staff and / or the public to view:

3. RCH Gas Management Plan 2025.docx

2.5 River Clyde Homes recognises its responsibility to ensure that an effective Gas Management Plan is in place to promote the safety and security of tenants, owners, staff and users of its homes and buildings and to protect the asset value of those buildings it owns and manages. The operation of the policy ensures that the RCH Group meets its legal requirements under the gas legislation. The principal legislation in this area is as follows:

- Gas Safety (Installation and Use) Regulations 1998 and the Gas Safety (Installation and use) (amendment) regulation 2018
- Regulation 36(3)(a) or (b)
- The Health & Safety at Work Act 1974
- The Management of Health & Safety at Work Regulation 1999
- The Fire Safety (Scotland) Regulations 2006
- Housing (Scotland) Act 2001
- Housing (Scotland) Act 2006
- The Housing Scotland Act 2014
- The Social Housing (Regulation) Act 2023
- Approved Codes of Practice (ACOP) L56 Safety in the Installation and Use of Gas Systems and Appliances
- Building (Scotland) Regulations 2004
- The Gas Safety (Management) (Amendment) Regulations 2023

2.6 The Gas Management Policy should also be read in conjunction with the following policies and strategies:

- Repairs and Maintenance

3. Policy Statement and Responsibilities

- 3.1 River Clyde Homes is a Registered Social Landlord (RSL) and is considered to be a duty holder under the Gas Safety (Management) Regulations, with the Chief Executive responsible for undertaking or delegating the duties under these regulations.
- 3.2 Directors are responsible, for ensuring the health, safety and welfare at work of all employees in their respective departments. In particular, where they are responsible for staff or operatives who may be required to deal with gas safety they will:
- Ensure that adequate resources are made available to ensure suitable arrangements for the management of Gas Safety.
 - Ensure appropriate training, information and instruction is provided for relevant staff and operatives in the form of training courses, seminars, information leaflets, booklets and personal instruction..
 - Ensure that where specialist technical expertise in relation to Gas Safety is not available within the Department, suitable arrangements are in place to obtain any necessary information as required.
- 3.3 RCH will appoint a suitable, qualified person to maintain a gas safety management system.
- 3.4 The system will allow RCH's competent person to keep an accurate log of all gas appliances within the association's assets, service records, and contractor monitoring arrangements, gas incidents and other issues as required. The competent person will be provided with appropriate training to carry out their duties effectively.
- 3.5 Processes are in place to monitor the day-to-day implementation of operational procedures related to this policy.
- 3.6 Independent external auditors undertake a review of 10% of all gas works carried out on installations, servicing, and landlord gas safety check certificates.
- 3.7 River Clyde Homes will ensure that all locations with gas appliances and gas fittings are identified and recorded, and this information is available to all who need it.
- 3.8 All reasonable steps will be taken using schematics and other information sources to ensure Gas infrastructure is not present within our boundary areas.
- 3.9 A comprehensive Gas Management system is in place and maintained. This includes a gas asset register and gas procedures required to ensure compliance with the current gas regulations.

3.10 The Compliance Officer (Gas) will be responsible for ensuring the accuracy of the gas register and will ensure it is maintained and current.

3.11 The gas register is maintained within our core Housing and Asset Management System (ActiveH).

3.12 RCH will ensure compliance with all Scottish Housing Regulator requirements and adhere to the Notifiable Events Guidance in relation to this policy.

4. Operational Procedures

4.1 Access Procedures

RCH has established a systematic approach to gaining access to properties for gas safety checks In accordance with Regulation 36A:

(1) Where a safety check of an appliance or a flue made in accordance with regulation 36(3)(a) or (b) is or was completed within the period of 2 months ending with the deadline date, that check is to be treated for the purposes of regulation 36(3)(a) and (b) as having been made on the deadline date.

- Initial notification sent to tenant 63 days before certificate expiry
- Two follow-up letters sent at 6 weeks and 4 weeks if there was no response
- Contact attempts by email and text and telephone throughout process
- The final hand delivered letter 7 days prior to forced access but before MOT date is reached

In cases where there is reason to believe there is immediate danger, RCH may exercise rights of entry under the Housing (Scotland) Act

4.2 Digital Record Keeping

- All gas safety records are digitally stored within the Housing and Asset Management System.
- Records are backed up daily with secure off-site storage
- Records are retained for a minimum of 2 years as required by legislation
- Digital certificates are automatically forwarded to tenants
- Real-time compliance reporting allows for immediate identification of non-compliant properties
- Comprehensive audit trail of all gas safety activities maintained

4.3 No-Access Procedure

When tenants repeatedly refuse access:

- Legal proceedings are initiated when necessary to enforce access

- Monthly monitoring of 'no access' cases by the Senior Asset and Compliance Manager
- Vulnerability assessment to identify tenants who may need additional support

4.4 Appliance Management

- All gas appliances owned by RCH are recorded in the asset register
- Annual inspections include an assessment of appliance condition and efficiency

5. Contractor Management

5.1 Contractor Selection and Qualification

All contractors undertaking gas work for RCH must:

- Be Gas Safe registered with appropriate ACS qualifications
- Provide evidence of public liability insurance (minimum £10 million cover)
- Demonstrate previous experience in social housing gas safety work
- Submit to a formal procurement process in accordance with RCH's procurement policy
- Agree to comply with RCH's code of conduct and tenant care standards
- Maintain up-to-date knowledge of gas safety regulations and industry best practice

5.2 Performance Management

Contractor performance is monitored through:

- Monthly KPI reports on completion rates, response times, and tenant satisfaction
- Quarterly contract review meetings with senior management
- Random spot checks by RCH's Gas Compliance Coordinator
- External audit of 10% of all works completed
- Tenant feedback surveys
- Analysis of recurring issues or patterns of failure

5.3 Quality Assurance

- 10% external assurance checks
- All operatives must carry and present valid Gas Safe ID cards
- Photographic evidence of safety-critical components required for all services
- Complete service records must be submitted within 24 hours of completion

- Any unsafe situations must be reported immediately to the Gas Compliance Coordinator
- Random technical audits conducted on completed works
- Annual review of contractor training and qualifications

6. Emergency Response Procedures

6.1 Gas Leaks and Carbon Monoxide

In the event of a suspected gas leak or carbon monoxide incident:

- Immediate evacuation of the affected area
- Call to the National Gas Emergency Service (0800 111 999)
- Notification to the Gas Compliance Coordinator within 1 hour
- Property to be made safe before re-occupation
- Incident report to be completed within 24 hours
- Root cause analysis conducted for all significant incidents

6.2 Response Times

- Emergency gas issues: Attendance within 2 hours, 24/7/365
- Urgent issues (no heating/hot water): Attendance within 24 hours
- Non-urgent issues: Attendance within 5 working days
- Response times are monitored and reported monthly

6.3 Incident Reporting

- All gas-related incidents are recorded on the incident management system
- Serious incidents are reported to the Health and Safety Executive in accordance with RIDDOR regulations
- Quarterly incident analysis to identify trends and improvement opportunities
- Annual safety review to update procedures based on incidents and near misses
- Learning from incidents shared across the organisation and with contractors

6.4 Emergency Contact Information

Emergency contact information is:

- Prominently displayed in all communal areas
- Included in all tenant handbooks and welcome packs
- Available on the RCH website and tenant portal

- Distributed annually with a gas safety certificate Provided in accessible formats and multiple languages

6.5 Co-ordination with External Agencies

- Clear protocols established with emergency services
- Regular liaison with the National Gas Emergency Service
- Participation in local resilience forums
- Information-sharing agreements with other housing providers
- Annual review and testing of emergency plans

7. Tenant Engagement and Communications

7.1 Tenant Education

RCH will proactively work to improve tenants' knowledge on gas safety through:

- Annual gas safety awareness campaign
- Information packs for new tenants
- Quarterly articles in tenant newsletters
- Safety advice on the RCH website and social media channels
- Community gas safety workshops, particularly targeted at vulnerable tenant groups
- Digital resources, including video guides and interactive tools

7.2 Communication Strategy

- Clear, jargon-free communication in all gas safety materials
- Information available in multiple languages and formats
- Use of visual materials for those with literacy challenges
- Regular SMS reminders for upcoming gas safety checks
- Tenant feedback mechanism for all gas safety interactions
- Tailored communication approaches for different tenant demographics

7.3 Tenant Responsibilities

Information provided to tenants will clearly outline their responsibilities:

- Providing access for annual gas safety checks
- Not tampering with gas appliances or flues

- Reporting gas safety concerns promptly
- Understanding how to use gas appliances safely
- Knowing what to do in an emergency
- Maintaining adequate ventilation in properties with gas appliances

7.4 Tenant Satisfaction

- Regular surveys to assess tenant satisfaction with gas services
- Clear complaints procedure for gas-related issues
- Annual review of tenant feedback to identify improvements
- Tenant involvement in service design and improvement
- Recognition of exemplary tenant cooperation

8. Continuous Improvement

- Annual internal audit of gas safety management processes
- Learning from incidents and near misses incorporated into policy updates
- Tenant feedback is used to refine operational procedures
- Industry developments and best practices monitored and adopted
- Regular staff training on policy changes and implementation

9. Document Control

- Version control system for all gas safety documentation
- Clear audit trail of policy changes and approvals
- Responsibility for updates assigned to the Gas Compliance Coordinator
- Distribution of updated policy to all relevant stakeholders
- Regular review of associated procedures and guidance documents

10. Equality, Diversity and Inclusion

10.1 RCH will apply this policy fairly and consistently. In implementing this policy, we will not directly or indirectly discriminate against any person or group of people because of their race, religion or belief, gender, disability, age, sexual orientation, or any other grounds. Our commitment to equality and fairness will apply irrespective of factors such as age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion or belief, sex, sexual orientation, or other personal attributes.

10.2 RCH will make reasonable adjustments to ensure that all customers can access services, information and support.

11. Data Protection

11.1 All personal data collected in relation to gas safety management will be managed in accordance with data protection legislation and RCH's data governance policies.

12. Complaints

12.1 Customers who are dissatisfied with how this safety service has been managed may raise a complaint through RCH's Complaints Procedure. Where dissatisfaction remains, customers may refer the matter to the Scottish Public Services Ombudsman.

13. Monitoring, Performance and Reporting

13.1 RCH will monitor performance against this policy on an ongoing basis. Key performance indicators will include, but are not limited to:

- Percentage of properties with valid gas safety certificates (target: 100%)
- compliance with statutory requirements and repair timescales
- customer satisfaction

13.2 Performance information will be reported regularly to the Executive Leadership Team and the RCH Board to provide assurance, support scrutiny and drive continuous improvement. Where performance concerns are identified, appropriate corrective action will be taken.

14. Review

14.1 The Policy will be reviewed every 2 years, or earlier where required due to legislative change, regulatory guidance, complaints, notifiable events or learning from performance monitoring.