Teachers' Housing Association

Housing Safety Compliance Policy

Tier 1 – Strategic & Regulatory · Board approval · July 2026

Prepared by House of Risk Ltd

Document Control Sheet

Status (Draft or Final & Version)	FINAL – V1.0
Document reference	Housing Safety Compliance Policy
Reason for review	New overarching policy consolidating THA's five statutory building-safety compliance areas – gas, electrical, fire, asbestos and legionella – together with lifts and lifting equipment and smoke and carbon monoxide alarms, into a single Tier 1 policy. Drafted in the THA Policy Template and aligned to the rationalised Policy Framework (April 2026) and the tiered policy governance model. Reflects the RSH Safety and Quality Standard (2024), the Building Safety Act 2022 and current statutory safety regimes. Supersedes the separate Gas Safety Policy and Fire Safety Policy.
Approved by (Board/Committee/Exec)	Board
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Version Control

Guidance: a major change requiring approval moves the whole version number (e.g. V1.0 to V2.0). A minor change not requiring approval moves only the number after the decimal point. Where a document is reviewed but unchanged, the number after the decimal point still moves.

Date	Reviewed by (name and title)	New version number	Summary of changes
July 2026	Becky Tucker at House of Risk Ltd	V1.0	New policy consolidating THA's building-safety compliance arrangements (gas, electrical, fire, water/legionella, asbestos, lifts and alarms) into a single Housing Safety Compliance Policy, drafted in the THA Policy Template and aligned to the rationalised Policy Framework. Supersedes the standalone Gas Safety Policy and Fire Safety Policy.

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1. Scope

This policy applies to all homes, buildings and communal areas that Teachers' Housing Association (THA) owns or manages; general needs housing, sheltered accommodation and communal areas. It applies to everyone who delivers or supports safety compliance, including colleagues, contractors, consultants and agents acting on behalf of THA.

It covers the statutory building-safety areas; gas, electrical, fire, water hygiene (legionella), asbestos, and lifts and lifting equipment, together with smoke and carbon monoxide alarms and THA's wider building-safety duties.

The policy does not apply to areas within privately owned leasehold properties except where THA retains landlord or management responsibility (for example, communal parts) or where required by the lease or by statute.

Damp, mould and condensation are dealt with under the separate Damp and Mould Policy, which sits alongside this policy. Together they set out how THA keeps its homes safe and meets its duties under the Regulator of Social Housing's Safety and Quality Standard.

2. Purpose and objectives

The purpose of this policy is to set out how THA meets its statutory duties across all building-safety compliance areas, and to give the Board, the Regulator and residents assurance that THA's homes are safe.

The objectives of this policy are to:

- prevent injury, harm or loss of life arising from building-safety hazards;
- achieve and evidence compliance in each statutory safety area, on time and to standard;
- hold an accurate, up-to-date understanding of THA's homes and the safety assets within them;
- appoint competent people, contractors and specialists to deliver safety requirements;
- maintain accurate, auditable records and reliable compliance data;
- respond effectively to defects, incidents, non-compliance and emerging risks; and
- provide the Board and Executive Team with clear, reliable assurance that homes are safe.

3. Policy statement

THA's priority is to keep residents safe in their homes. THA recognises building-safety compliance as a critical statutory obligation and a core part of safe, well-managed homes.

THA is committed to meeting its duties in each safety area to the highest standard that is reasonably practicable; to knowing its homes and the assets within them; to appointing competent people and contractors; to keeping accurate records and reliable data; and to maintaining a clear golden thread from strategy, through controls and records, to Board assurance. Vulnerable residents and higher-risk buildings are prioritised, and overdue or high-risk items are chased and escalated until they are resolved.

4. Definitions

Term	Definition
Accountable Executive	The Operations Director, holding executive accountability for building-safety compliance across THA. An internal governance title, not a statutory 'dutyholder' designation.
ACM	Asbestos-containing material.
ACoP L8	The HSE Approved Code of Practice and guidance for the control of legionella bacteria in water systems.
EICR	Electrical Installation Condition Report – the periodic inspection of a property's fixed electrical installation.
Fire Safety Lead	The competent officer who coordinates THA's operational fire-safety arrangements on behalf of the organisation. The legal 'Responsible Person' is determined in accordance with the Regulatory Reform (Fire Safety) Order 2005, not by this policy.
FRA	Fire Risk Assessment – the suitable and sufficient assessment required for buildings with communal areas.
Golden thread	The accurate, accessible information that shows how a building is kept safe, from strategy through controls to assurance.
Higher-risk building	Broadly, a building at least 18 metres tall, or with at least seven storeys, containing two or more residential units (Building Safety Act 2022).
LGSR	Landlord Gas Safety Record – the mandatory annual gas safety check.
LOLER	Lifting Operations and Lifting Equipment Regulations 1998.
Material / notifiable issue	A safety matter serious enough that THA would tell the Regulator of Social Housing without delay.
Three lines of defence	The assurance model: front-line delivery (1st), management monitoring (2nd) and independent audit (3rd).

5. Policy

5.1 Our approach – the safety cycle

THA manages building safety as a single, planned, risk-based programme. For each area THA assesses the risk, plans the work, delivers it on time using competent contractors, records it against the property, assures the quality of what has been done, and reports compliance to the Board. Each area is managed to its own statutory regime, and vulnerable residents and higher-risk buildings are prioritised throughout.

THA recognises that while all compliance requirements are important, immediate life safety risks receive the highest priority when allocating resources and responding to incidents.

5.2 Gas safety

THA will comply with its landlord duties under the Gas Safety (Installation and Use) Regulations 1998 (as amended), ensuring all gas appliances, fittings and flues are maintained in a safe condition. THA will:

- complete an annual Landlord Gas Safety Record (LGSR) for every property with a gas supply, on a 10–12 month cycle;

- provide existing residents with the relevant gas-safety record within 28 days and provide it to new residents before occupation; and, where legislation permits a communal record to be displayed, display it prominently and explain how residents may obtain an individual copy;
- ensure only Gas Safe registered engineers carry out gas work, and inspect and record all new installations;
- retain gas safety records for at least the statutory minimum period and in accordance with THA's records-retention requirements; and
- quality-assure a sample of inspections through independent third-party audit.

5.3 Electrical safety

In line with the statutory electrical safety standards for social housing, the RSH Safety and Quality Standard and BS 7671, THA will keep the fixed electrical installation and landlord-provided electrical equipment in its homes safe. THA will:

- carry out inspection and testing of fixed electrical installations at least every five years, or sooner where the previous report requires it, with work carried out to BS 7671 by competent persons;
- inspect or test landlord-provided electrical equipment at least every five years, in accordance with the applicable regulations;
- provide electrical reports and records to existing, new and prospective residents within the required statutory timescales;
- complete remedial or further investigative work within 28 days of the report, or any shorter period the report specifies; and
- carry out an appropriate electrical safety check when a home becomes void, including a visual inspection and any further inspection or testing indicated by its condition or existing records.

5.4 Fire safety

THA will fulfil its fire-safety duties, including those of the Responsible Person under the Regulatory Reform (Fire Safety) Order 2005 where THA holds that role, as strengthened by the Fire Safety Act 2021 and the Fire Safety (England) Regulations 2022. THA will:

- ensure every building with communal areas has a suitable and sufficient Fire Risk Assessment (FRA), reviewed on a risk basis and after material change;
- manage FRA actions to completion within agreed timescales, escalating high-risk issues immediately;
- maintain, test and service fire safety systems and equipment – fire detection and alarms, emergency lighting, fire doors and firefighting equipment – to legal, British Standard and manufacturer requirements;
- in buildings that meet the relevant thresholds, carry out fire door checks, provide fire-service information and wayfinding signage, and meet the other duties under the Fire Safety (England) Regulations 2022;
- keep a clear evacuation strategy for each building and communicate it to residents and staff; and
- provide residents with accessible fire safety information and identify vulnerable residents for person-centered consideration where recommended.

5.5 Water safety and legionella

THA will manage the risk from legionella bacteria in its water systems in line with the Health and Safety at Work etc. Act 1974, COSHH 2002, and the HSE Approved Code of Practice L8 and guidance HSG274. THA will:

- carry out a legionella risk assessment for relevant water systems, reviewed on a risk basis and after material change;

- maintain a written scheme of control, with monitoring and control measures delivered by competent persons; and
- act promptly on the findings of risk assessments and monitoring.

5.6 Asbestos

THA will meet its duty to manage asbestos under Regulation 4 of the Control of Asbestos Regulations 2012. THA will:

- carry out asbestos management surveys and maintain an up-to-date asbestos register;
- maintain and follow an asbestos management plan, re-inspecting asbestos-containing materials (ACMs) on a risk basis;
- commission refurbishment and demolition surveys before intrusive works, in line with HSG264; and
- inform and warn anyone who may disturb ACMs, including contractors, before work begins.

5.7 Lifts and lifting equipment

THA will keep passenger lifts, stairlifts and hoists safe under the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and the Provision and Use of Work Equipment Regulations 1998 (PUWER). THA will:

- service lifting equipment in line with manufacturer and contract requirements;
- arrange a thorough examination – six-monthly for equipment that carries people – by a competent person; and
- act promptly on defects and thorough-examination reports.

5.8 Smoke and carbon monoxide alarms

THA will comply with the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended in 2022). THA will:

- provide a smoke alarm on every storey of a home used as living accommodation;
- provide a carbon monoxide alarm in any room used as living accommodation that contains a fixed combustion appliance (excluding gas cookers);
- check alarms are in working order at the start of each tenancy; and
- repair or replace a faulty alarm as soon as reasonably practicable after THA is notified that it is not working.

5.9 Building safety and higher-risk buildings

Additional duties apply to the tallest buildings under the Building Safety Act 2022. Broadly, a higher-risk building is at least 18 metres tall, or has at least seven storeys, and contains two or more residential units. Where THA holds such buildings, it will identify and discharge the duties applying to it as an accountable person or principal accountable person – including registration, maintaining prescribed building-safety information, preparing and maintaining the safety case report, mandatory reporting, and resident engagement where applicable. THA keeps its housing stock under review against the statutory higher-risk-building criteria and will identify and discharge any duties that apply should it own or manage a higher-risk building. The position is reviewed whenever stock is acquired, developed or materially altered.

5.10 Access and the no-access process

THA can only keep a home safe if it can get in to check it. THA will give reasonable notice and work to arrange convenient appointments. Where access is not gained, THA will follow a formal escalation – repeat appointments at varied times with a clear record kept, a written warning explaining why the check matters, and legal action to obtain access, where necessary, as a last

resort. Throughout, THA will take account of vulnerabilities and support needs so that residents are treated fairly and safely.

5.11 Knowing our homes – stock and asset data

Safety compliance depends on knowing what THA is responsible for. THA maintains an accurate, up-to-date and evidenced record, at individual property level, of the condition of its homes and the safety-related assets and appliances within them – for example, whether a home has a gas supply, its heating type, and any communal systems – based on physical assessment. This record is the foundation of the compliance programme: it drives what checks are due, where and when. THA keeps it current as homes are acquired, disposed of or altered, and uses it to plan investment and to evidence compliance to the Board and the Regulator.

5.12 Competent people and contractors

THA delivers safety compliance through competent people. THA ensures that staff, contractors and specialist assessors are suitably qualified, accredited and experienced for the work they carry out – for example, Gas Safe registration for gas work and competent fire risk assessors. Contractor competence and performance are checked at appointment and monitored through the contract, and certification and records are obtained for every task. THA monitors contractor performance through defined KPIs, quality assurance and periodic review.

5.13 Records, data and systems

THA keeps complete, accurate and accessible records for every safety area in its asset compliance system, held as a single source of truth. Records are retained for the required periods (for example, gas records for at least six years), validated for accuracy on a regular basis, and used to produce compliance reporting. THA treats the quality and integrity of its compliance data as a compliance matter in its own right, because reliable data is what allows THA, the Board and the Regulator to trust that homes are safe.

5.14 Reporting defects, incidents and regulatory notification

Anyone – a resident, colleague or contractor – can report a safety defect. Every report is logged, risk-assessed, prioritised by seriousness and who is affected, put right, and confirmed as complete; urgent and emergency hazards are dealt with first. THA records, investigates and learns from safety incidents and near misses, and escalates serious incidents to the Chief Executive and Chair. Lessons learned are incorporated into future working practices, procedures and assurance activities. THA meets its external reporting duties, including reports to the Health and Safety Executive under RIDDOR, and will notify the Regulator of Social Housing without delay of any material or notifiable issue affecting the safety of tenants' homes.

5.15 Working with residents on safety

Keeping homes safe is a shared effort. THA gives residents clear, accessible information about safety in their homes and about how to report a concern, is transparent about its safety performance, and listens and responds when residents raise issues – consistent with the Transparency, Influence and Accountability Standard. THA pays particular attention to residents who are vulnerable or have additional needs.

6. Compliance, assurance and Board oversight

THA recognises that compliance is demonstrated not simply by carrying out safety checks, but by evidencing – through governance, assurance and independent scrutiny – that homes remain safe. THA manages this through a clear assurance framework built on three lines of defence:

- First line – the Asset Compliance team and contractors deliver and record the checks and manage the programme day to day;

- Second line – the Asset Compliance Manager and management monitor performance against defined measures for each area, check data quality, and challenge exceptions; and
- Third line – independent audit provides assurance to the Board that the arrangements, and the data behind them, are sound.

Performance in each area is measured, for example, the percentage of valid gas records, first-time access rates, and overdue checks – and reported to the Board through the Compliance Report. That report sets out performance against target, overdue and high-risk items, the status of remedial actions, and any exceptions with the action being taken. The Board, through its named Health & Safety member and the relevant committee, receives regular assurance in sufficient detail that homes are safe, and holds management to account for putting things right. Overdue, high-risk and remedial items are tracked to completion. THA's reporting also includes the building-safety Tenant Satisfaction Measures that apply to it, including for electrical safety. A summary of THA's assurance and reporting routes is at Appendix B.

7. Sustainability

THA plans safety works to minimise disruption and waste, and services equipment efficiently to reduce unnecessary emissions. Where relevant, safety compliance supports THA's wider planning for the transition to lower-carbon systems, without ever compromising resident safety.

8. Responsibilities

Role	Responsibility
Board (and named Board member for Health & Safety)	Approves this policy, oversees building-safety compliance, and gains assurance through the assurance framework that THA's homes are safe. Holds management to account for putting things right.
Chief Executive	Accountable for building-safety compliance across THA and for setting the tone from the top. Receives escalation of serious incidents.
Operations Director (Accountable Executive)	Executive accountability for the compliance programme, policy ownership in practice, resource allocation, and commissioning of independent assurance.
Asset Compliance Manager	Plans and delivers the safety programme across all areas, maintains the asset data, records and compliance dashboard, manages contractors, and reports compliance, exceptions and remedial actions.
Fire Safety Lead	Coordinates THA's operational fire-safety arrangements on behalf of the organisation. The legal Responsible Person under the Regulatory Reform (Fire Safety) Order 2005 is determined by the Order, not by this policy.
Contractors and competent specialists	Carry out safety work competently and to standard and provide the required certification and records.
All colleagues	Report any safety defect straight away, support access for checks, and follow the safety procedures.
Residents	Allow access for safety checks, report anything unsafe, and never remove or disable a smoke or carbon monoxide alarm.

9. Equality and diversity

THA will apply this policy consistently and fairly and will not discriminate against anyone based on a protected characteristic under the Equality Act 2010. When managing access, enforcement and communication, THA will take account of vulnerabilities and support needs – including person-centered fire risk assessments where these are recommended – so that all residents are treated fairly and kept safe.

10. Related documents

- Housing Safety Compliance Procedure (companion Tier 3 procedure)
- Damp and Mould Policy
- Health and Safety Policy
- Repairs, Maintenance and Disrepair Policy
- Risk Management Policy and Framework
- Complaints Policy
- Compensation and Remedies Policy
- Data Protection Policy

This policy supersedes THA's separate Gas Safety Policy and Fire Safety Policy, and removes the need for standalone electrical, asbestos and legionella policies; those areas are now covered as distinct sections within this single policy.

11. Legislation and regulation

THA will comply with all relevant legislation and regulatory standards, including but not limited to:

- Health and Safety at Work etc. Act 1974; Management of Health and Safety at Work Regulations 1999
- Gas Safety (Installation and Use) Regulations 1998 (as amended)
- Regulatory Reform (Fire Safety) Order 2005; Fire Safety Act 2021; Fire Safety (England) Regulations 2022
- Building Safety Act 2022
- Control of Asbestos Regulations 2012
- Control of Substances Hazardous to Health Regulations 2002 and ACoP L8 (legionella)
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER); Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended 2022)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Landlord and Tenant Act 1985; and the electrical safety standard BS 7671
- Regulator of Social Housing – Safety and Quality Standard, and Transparency, Influence and Accountability Standard (2024)

12. Review

This policy will be formally reviewed every two years, or sooner if there are material changes to legislation, regulation, or THA's operating arrangements. In addition, THA will carry out an annual lighter-touch "Policy MOT", coordinated by the Accountable Executive and Asset Compliance Manager, to confirm the policy remains current and to capture any lessons learned. Review triggers include:

- appointment of a new safety contractor in any area;
- a significant safety-related incident or audit finding;
- any change to HSE guidance or Regulator of Social Housing requirements; and
- amendments to relevant legislation or codes of practice.

Appendix A – The safety compliance programme at a glance

Frequencies shown are the usual position; the actual programme is driven by each property's circumstances and the relevant risk assessment.

Safety area	What we do	Typical frequency
Gas	Gas safety check on every home with gas, by a Gas Safe registered engineer; record issued to the resident.	Annually (10–12-month cycle)
Electrical	Periodic inspection (EICR), with remedial work to BS 7671.	At least every 5 years, and at change of tenancy
Fire	Fire risk assessment of buildings with communal areas and acting on the findings.	Risk-based; reviewed regularly and after material change
Water / legionella	Legionella risk assessment, with monitoring and control (ACoP L8).	Per the risk assessment
Asbestos	Management survey, asbestos register, and re-inspection.	Per the asbestos management plan
Lifts	Servicing and thorough examination (LOLER).	Six-monthly thorough examination
Smoke & CO alarms	Provide and check alarms; repair or replace when reported faulty.	At the start of each tenancy, and as reported

Appendix B – Assurance and reporting at a glance

How THA gain and evidence assurance that its homes are safe – the golden thread from front-line delivery to Board oversight.

Assurance route	What it covers	Frequency	Who receives it
Operational compliance dashboard	Live status by area, including gas and electrical safety; what is due, done and overdue; data checks	Continuous / monthly	Asset Compliance team; SMT
Compliance Report	Performance against measures; overdue and high-risk items; status of remedial actions; exceptions and actions	Quarterly	Board / relevant committee
Independent assurance	Delivered through the Board-approved internal audit and assurance programme; frequency and scope informed by risk, performance, incidents and previous findings (third line)	Risk-based	Board / Audit & Assurance
Serious incident / material issue	Immediate escalation; RIDDOR to the HSE and notification to the RSH where required	As it arises	CEO, Chair; RSH/HSE as required