



London Borough
of Hounslow

GAS SAFETY POLICY

Assistant Director for Asset Management & Programme Delivery

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1.0 Introduction

- 1.1 The London Borough of Hounslow is committed to act as a Responsible Landlord and fulfil its legal obligations, in compliance with Gas Safety (Installation and Use) Regulations 1998 and other gas related regulations and standards.

2.0 Aim and Objectives

- 2.1 This policy aims to outline the arrangements to managing gas safety within the London Borough of Hounslow owned and managed properties.
- 2.2 This policy also aims to underscore key roles and responsibilities in ensuring compliance with Gas Safety (Installation and Use) Regulations 1998 and other gas related regulations and standards.

3.0 Scope

- 3.1 This policy applies to the London Borough of Hounslow owned and managed residential buildings and corporate properties and to any property, where the London Borough of Hounslow has a legal responsibility for maintenance and repairs.

This includes and not limited to the following:

- General Needs.
 - Supported Housing and Sheltered Housing.
 - Offices and Depots.
 - Community Centres.
 - Libraries and Leisure Centres.
 - Schools and Education Premises.
- 3.2 This policy does not apply to the premises that do not have a gas installation or gas appliances.
- 3.3 This policy does not apply to premises in the following properties:
- Properties that are sold on a long lease.
 - Properties that let on a commercial lease or tenancy. Where the London Borough of Hounslow will ensure that compliance certifications, as stipulated by the terms of the lease, are monitored.
- 3.4 The following items are not included in the scope of maintenance and servicing regime undertaken by the London Borough of Hounslow.
- Gas cookers, Gas ovens and hobs that are owned by the tenants and/or building occupiers, on which case the inspection will solely be undertaken on the Landlord Gas Safety Record (LGSR).
 - Water heating appliances that had been fitted by the tenants and/or building occupiers. Except for those that LBH has expressly agreed to undertake maintenance and servicing responsibilities.

4.0 Legislation

4.1 London Borough of Hounslow shall comply with the following Legislation.

- Gas Safety (Installation and Use) Regulations 1998.
- Health and Safety at Work etc. Act 1974.
- Management of Health and Safety at Work Regulations 1999.
- Housing Act 2004.
- Housing Health and Safety System Rating 2005.
- Gas Safety (Rights of Entry) Regulations 1996.
- Freedom of Information Act 2000.

5.0 Policy Statement

5.1 London Borough of Hounslow recognises that anyone living or visiting its residential buildings, working in their offices or in any other premises, where it is the legal Landlord, these individuals must be protected in as far as reasonably practicable, from the harm caused by the absence of gas safety checks.

5.2 London Borough of Hounslow shall maintain the integrity of its residential buildings, owned and managed properties' gas safety installations and equipment. It shall also develop robust processes and procedures that can assist in ensuring the Council compliance with its legal requirements of applicable legislation and to minimise the risk occurring because of gas and/or gas installation, to its lowest practicable level.

5.3 The London Borough of Hounslow is committed to take reasonable measures to prevent the risk to health and safety to its employees, residents and service users occurring from:

- Carbone Monoxide poisoning.
- Gas Leaks and resulting in fire incidents.
- Loss of heating and/or hot water facilities.

5.4 London Borough of Hounslow shall ensure the implementation of this policy, based on the following commitments and requirements.

- The appointment of a competent and Gas Safe accredited contractor to carry out gas safety inspections in all LBH owned properties where gas heating installations and /or hot water installations as well as gas safety appliances.
- The effective arrangements for undertaking inspections and maintenance of communal gas installations and appliances in residential buildings.
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- The appointment of a competent person(s) that ensures adequate monitoring as well as overseeing projects and effective implementation of this policy.

- The effective arrangements for responding to non-accesses and/or any system failure, which might expose LBH residents and building occupiers to a loss of heating and/or hot water, within their respective dwellings and premises.
- The effective arrangements to undertake regular reviews and effective implementation of this gas safety policy. These include the 10 weeks process required for access, ensuring all statutory gas safety checks are effectively carried out in a timely manner.

6.0 Roles & Responsibilities

6.1 Chief Executive

- 6.1.1 The Chief Executive is the Responsible Person and has the overall responsibility and accountability for Gas Safety within the Council's owned and managed property portfolio, unless agreed otherwise, and where the Council has a landlord compliance responsibility.
- 6.1.2 The Chief Executive is responsible for providing strong leadership in the management of Gas Safety related issues and ensuring Directors take ownership of gas safety matters within their respective areas of responsibilities.

6.2 Assistant Director for Asset Management & Programme Delivery

- 6.2.1 The Assistant Director for Asset Management & Programme Delivery shall hold the delegated responsibility given to them by the Chief Executive for the implementation of this policy, across the Council's owned and managed properties, where the Council has landlord's compliance responsibility.
- 6.2.2 The Assistant Director for Asset Management & Programme Delivery shall ensure that sufficient funds and resources are available to enable an adequate management of gas safety related inspections and testing, and - where applicable – any works arising from the annual Landlord Gas Safety Record and/or from other repairs undertaken on gas safety appliances.
- 6.2.3 The Assistant Director for Asset Management & Programme Delivery shall provide the Chief Executive and the Senior Leadership Team with reassurances that statutory Gas Safety Inspections and gas safety related matters are being adequately carried out in the required timeframe, and where repairs and inspections have been identified as requiring additional and urgent attention, an Action Plan should be drawn up to address any shortcomings and prevent non-compliance.

6.3 Property Compliance Team

- 6.3.1 The Property Compliance Team shall be responsible for ensuring all structural building as well as mechanical and electrical inspections and testing, within the corporate properties and residential buildings have been effectively carried out and monitored for compliance, in line with the council legal duties and responsibilities.

- 6.3.2 The Property Compliance Team shall ensure adequate management of the gas safety contractors as well as the data compliance monitoring of all statutory annual gas safety inspections and gas safety related works carried out.
- 6.3.3 The Property Compliance Team shall ensure that all works carried out to address mechanical & electrical compliance, including gas installation and gas related repairs are adequately checked for quality assurance and standard requirements.
- 6.3.4 The Property Compliance Team - in co-operation with the Asset management Team - shall ensure an adequate management of the gas safety contractor's, undertaking gas safety inspections and -where applicable- gas safety related remedial works, as part of the preventative planned maintenance and reactive repairs.
- 6.3.5 The Property Compliance Team shall ensure the measurement of the Council's mechanical & electrical compliance performance and evaluation, generating accurate reports and solutions to support the London Borough of Hounslow's senior management in meeting its regulatory duties, as laid out by the relevant legislation.

6.4 Asset Management Team

- 6.4.1 The Asset Management Team shall ensure that a register is in place which holds all relevant data information pertaining to the Council's owned and managed properties, plant and equipment. This includes the location of gas safety appliances that require a statutory Landlord Gas Safety Record and Gas Appliance installations.
- 6.4.2 The Asset Management Team shall ensure all Properties and Plant data is being regularly checked, validated and maintained for accuracy.
- 6.4.3 The Asset Management Team shall ensure that all data compliance collected during a handover from the Development Team, these are communicated to the Property Compliance Team for validation and recording.
- 6.4.4 The Asset Management Team shall – in cooperation with the Property Compliance Team- take ownership of a risk register for all areas of contract management, ensuring that property plant and equipment compliance requirements for inspection and testing as well as reactive repairs are being effectively delivered and any risk to property compliance, is being brought to light and adequately controlled and managed.

6.5 Directors and Head of Services

- 6.5.1 The Directors (including Assistant Directors) and Head of Services are responsible for communicating and the local implementation of this policy across their areas of responsibility.
- 6.5.2 They shall ensure that they are familiar with relevant legislation which could impact London Borough of Hounslow statutory compliance with the Gas Safety (Installation and Use) Regulations 1998, repairs and installations of gas appliances and any other related work(s) carried out within and/or by their Directorate.
- 6.5.3 They shall support and - where applicable- implement gas safety recommendations as received from the London Borough of Hounslow's approved and competent gas safety contractor(s), ensuring that colleagues under their control have received

sufficient information, instructions and training to undertake work activities that do not impede the integrity of the properties and/or result in a non-compliance with the statutory requirements.

- 6.5.4 They shall also have an adequate understanding and are familiar with any relevant service level agreements (i.e. The Council's own premises where services are provided by a third party) and which may either impact the Gas Safety Management Process and/or any other associated gas safety related works, such as repairs and/or installations.

6.6 Managers

- 6.6.1 Managers shall ensure that all colleagues receive adequate induction, information on gas safety within the London Borough of Hounslow owned properties and where the Council has landlord responsibility.
- 6.6.2 As part of the induction process, managers shall ensure that all colleagues are made aware of this policy, as well as how and where to report Gas Safety issues and concerns.
- 6.6.3 Any budgetary requirements for the purposes of statutory gas safety inspections and - where applicable- any related works are reviewed and approved. Where budgets are declined, a written record must be generated and maintained, outlining the reason(s) for the budget refusal and names involved in this decision making.
- 6.6.4 Managers shall ensure that suitable arrangements are in place to enable access to premises and residential buildings for the purpose of undertaking annual gas safety inspections and/or completing any identified gas safety related works.

6.7 Employees

- 6.7.1 London Borough of Hounslow employees must ensure that they are familiar with this policy and to comply with its content at all times, effectively.
- 6.7.2 All employees are responsible for ensuring they report any gas safety issues to the building managers and/or housings managers for corrective actions to be taken.

6.8 Corporate Health and Safety Team

- 6.8.1 The Corporate Health and Safety Team shall ensure the health, safety and wellbeing of employees, visitors and other relevant stakeholders that are occupying the Council's owned and managed buildings.
- 6.8.2 The Corporate Health and Safety Team shall provide adequate health and safety advice to all employees and relevant stakeholders- this includes Hounslow community schools and where the London Borough of Hounslow is the employer and Landlord, with the aim to prevent the risk of accidents, incidents and near misses to their health, safety and wellbeing as a result of gas safety concerns.
- 6.8.3 The Corporate Health and Safety Team shall measure health, safety and wellbeing performance, for accidents, incidents and near misses to prevent reoccurrence.

6.9 Housing Management Team

- 6.9.1 The Housing Management Team shall ensure that this policy is communicated, implemented and made readily accessible to all those that are affected by it, within the residential buildings.
- 6.9.2 The Housing Management Team shall ensure that all Housing Officers and Coordinators are provided with adequate information and instructions to support London Borough of Hounslow's management of gas safety risk, across its residential building portfolio.
- 6.9.3 The Housing Management Team shall ensure that Housing Officers and Housing Coordinators work cooperatively with the Corporate Health and Safety for reporting all accidents, incidents, near a miss and ill health, as a result of gas safety, so that these can be investigated and/or reported to the regulators through the appropriate channels, as and when required to do so.
- 6.9.4 The Housing Management Team shall ensure that Housing Officers and Housing Coordinators work cooperatively with the Asset Management Team, Corporate Health and Safety Team and the Property Compliance Team, by communicating the information passed on to them to the Council's Housing tenants and reporting health, safety and property compliance concerns back to the Council.
- 6.9.5 The Housing Management Team shall cooperate with the Council's approved Gas Contractors, ensuring where no- accesses to residential dwellings for statutory gas safety inspections and/or any gas safety related repairs and installations, these are recorded and appropriate actions are taken to arrange access to the residential dwellings, as soon as practicable.

7.0 Management Arrangements

7.1 Landlord Gas Safety Records

- 7.1.1 A Landlord Gas Safety Record is a statutory annual inspection carried out on all gas safety appliances and equipment. Gas Safety Inspections are required to be carried out by a Gas Safe Engineer.
- 7.1.2 A Landlord Gas Safety Record document should be sent out to the client no later than 28 days.
- 7.1.3 Pursuant to Regulation 36(3)(c) of the Gas Safety (Installation and Use) Regulations 1998, it is the Landlord's statutory duty to ensure the health and safety of its tenants by checking and servicing their gas appliances and installations on an annual basis, as well as retaining records and certification for a minimum of two years from the date of the check.
- 7.1.4 In residential buildings and where the Council's tenants are unreachable and access to their dwellings is not gained as a result, this may result in a potential contravention of Regulation 36. However, under Regulation 39 it is a defence in litigation, if the Landlord can demonstrate that it took all reasonable steps to prevent the contravention through a defined process.
- 7.1.5 In order to fulfil the regulatory requirements, arrangements for annual gas safety inspections in the London Borough of Hounslow owned properties are included within the maintenance contracts held by the Council's approved and competent gas contractor(s).

7.2 Quality Assurance Inspections

- 7.2.1 Employees and Contractors are expected – where applicable -to maintain high standards of customer care, in accordance with this policy and relevant service standards, including and not limited to; adhering to the corporate customer and staff charters, be courteous, be helpful and respond to the needs and concerns of residents sympathetically and sensitively.
- 7.2.2 Adequate records of all action(s)and steps taken to obtain access to the tenanted property for the purpose of completing statutory gas safety checks or Landlord Gas Safety Record shall be adequately maintained for traceability.
- 7.2.3 Any representations undertaken by customers and/or Councillors shall be managed and dealt with in accordance with relevant procedures and protocol.
- 7.2.4 A minimum of 10% of annual gas safety checks shall undergo quality assurance checks by a third party accredited. Ensuring these are carried out in line with the gas safety checks standards requirement. Any contractor' poor performance observed shall be escalated and brought to the attention of the contract manager and remedial actions raised shall be implemented.

7.3 Policy Review

- 7.3.1 This Gas Safety Policy shall be reviewed two-yearly for adequacy and effectiveness, ensuring it remains in compliance with the legal requirements as well as with the organisational structure in place to support its implementation.
- 7.3.2 This Gas Safety Policy shall be reviewed in the event of a major change that has occurred to London Borough of Hounslow's governance structure and/or had triggered a significant change in the Responsible Person's role and responsibilities.