

London Borough of Brent

Gas Safety Policy 2026- 2027

This policy sets out Brent Council's approach to ensuring gas safety across its housing stock. It establishes the arrangements for meeting the Council's statutory duties and managing the risks associated with gas in residents' homes.

Owner:	Spencer Randolph, Director of Housing Services	
Approved by:	DMT/Board/Cabinet	Insert date in format dd/mm/yyyy
Review cycle: (years)	1	
Next review date:	dd/mm/yyyy	



Regulator:	<ul style="list-style-type: none"> • Health and Safety Executive (HSE) • Regulator of Social Housing (RSH) – Safety and Quality Standard • Building Safety Regulator (BSR)
Legislation:	<ul style="list-style-type: none"> • Gas Safety (Installation and Use) Regulations 1998 (GSIUR) • Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Building Regulations 2010, including Part J – Combustion appliances and fuel storage systems • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) • Housing Act 2004, including the Housing Health and Safety Rating System (HHSRS) • Construction (Design and Management) Regulations 2015 • Smoke and Carbon Monoxide Alarm (England) Regulations 2015, as amended by the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 • Equality Act 2010
Codes of Practice:	<ul style="list-style-type: none"> • HSE Approved Code of Practice L56 – Safety in the Installation and Use of Gas Systems and Appliances • HSE guidance on gas safety in residential accommodation • Gas Safe Register guidance and relevant industry standards • Relevant British Standards and other applicable technical standards
The policy also operates in the context of:	<ul style="list-style-type: none"> • Gas Safety Management Plan • Building Safety Management System • Resident Engagement Strategy • Fire Safety Policy • Electrical Safety Policy • Lifts and Lifting Equipment Policy • Asbestos Policy • Legionella Policy • Health & Safety Policy • Repairs and Maintenance Policy

Contents

1. Purpose	4
------------------	---

2. Scope	4
3. Policy Statement.....	4
3.1 Equality, Diversity and Inclusion	5
4. Strategic Principles	5
4.1 Lifecycle Gas Safety Management	5
4.2 Risk-Based and Proportionate Control	6
4.3 Governance and Accountability	6
4.4 Competence and Training	6
4.5 Resident Engagement and Inclusion.....	6
4.6 Monitoring, Audit and Continuous Improvement.....	6
4.7 Open Safety Culture.....	7
5. Governance and Accountability	7
5.1 Duty Holder	7
5.2 Gas Safety Management and Assurance	7
5.3 Employees.....	8
5.4 Residents and Leaseholders	8
5.5 Contractors.....	9
6. Monitoring and Assurance	9
7. Communication.....	9

1. Purpose

The purpose of this policy is to set out Brent Council's commitment to the safe management of gas installations and appliances across all residential properties.

It establishes the framework for compliance with the Gas Safety (Installation and Use) Regulations 1998 (GSIUR) and related legislation, ensuring that all appliances, pipework, and flues are maintained safely and inspected at required intervals.

This policy forms part of Brent Council's wider Building Safety Strategy and aligns with the Council's statutory obligations under the Health and Safety at Work etc. Act 1974, ensuring residents, staff, and contractors are protected from the risk of fire, explosion, carbon monoxide poisoning, or gas leaks.

2. Scope

This policy applies to:

- All residential buildings owned or managed by Brent Council. Including general needs housing, supported and sheltered schemes, temporary accommodation, and houses in multiple occupation (HMOs).
- All communal gas installations, heating systems, and plant rooms under Brent Council control.
- All Brent Council staff, contractors, and partners involved in housing management, maintenance, or compliance services that could affect Building Safety.

Non-Housing corporate premises are covered under the Council's Corporate Health and Safety Policy.

3. Policy Statement

Brent Council recognises that gas safety is critical to maintaining safe homes and preventing loss of life, injury, or property damage.

This policy sets out the Council's framework for ensuring that all gas installations are installed, maintained, and tested in accordance with statutory requirements and industry best practice.

Our policy is to:

- **Comply Fully** with all gas safety legislation, including the Gas Safety (Installation and Use) Regulations 1998, and HSE's Approved Code of Practice (ACOP L56).

- **Ensure all Gas Appliances, flues, and Installations** are serviced and safety checked at least every 12 months by Gas Safe registered engineers.
- **Maintain valid Landlord Gas Safety Records (LGSRs)** for 100% of applicable properties at all times.
- **Implement Robust Data Management** and record-keeping using True Compliance to ensure full traceability of inspections, certificates, and remedial actions.
- **Ensure Competence** by engaging only qualified Gas Safe registered engineers to undertake gas work.
- **Promote Resident Safety and Awareness**, ensuring residents understand how to report faults, leaks, or access issues promptly.
- **Monitor Performance** through KPIs, audits, and governance reporting, ensuring continuous improvement and full compliance across the housing portfolio.

This policy reflects Brent Council's commitment to a proactive, risk-based, and transparent approach to Building Safety management across all its housing assets, in order to protect the health and wellbeing of residents and others.

3.1 Equality, Diversity and Inclusion

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

Brent Council will ensure that Gas Safety measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality Act 2010.

4. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

4.1 Lifecycle Gas Safety Management

- Gas safety will be embedded throughout each building's lifecycle: design, construction, handover, occupation, refurbishment, and end-of-life.
- We will maintain accurate and up-to-date gas system information to inform decision-making and ensure continuity of safety measures over the life of the building.

4.2 Risk-Based and Proportionate Control

- A proportionate, risk-based approach will be applied to gas safety management.
- Controls and resources will be prioritised based on the nature, complexity, age, and occupancy of each property.

4.3 Governance and Accountability

- Clear lines of responsibility and robust governance arrangements will underpin Gas Safety management. Brent Council will designate specific duty holders and responsible persons for Gas Safety at strategic and operational levels.
- Gas Safety performance and compliance will be monitored through established governance structures, ensuring senior oversight and accountability for delivering this policy.

4.4 Competence and Training

- All staff and contractors involved in Gas Safety will be suitably trained and qualified. Competence will be maintained through ongoing professional development and independent verification where appropriate.
- Engineers must hold valid Gas Safe registration for the appropriate category of work.

4.5 Resident Engagement and Inclusion

- Residents and leaseholders will be kept informed about Gas Safety arrangements in their homes and buildings.
- Brent Council will provide residents with relevant information or instructions to help control gas risks.
- We will seek to engage residents through communications and, where appropriate, consultation on major works affecting gas systems.
- Particular consideration will be given to residents who may be at higher risk to ensure suitable additional measures or adjustments are in place.

4.6 Monitoring, Audit and Continuous Improvement

- Gas safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.
- Brent Council is committed to learning from any Building Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our safety management systems and procedures.

4.7 Open Safety Culture

- Brent Council will promote a just and open culture where employees, contractors, and residents can report Gas Safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning.

5. Governance and Accountability

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for Gas Safety across all housing assets. The structure ensures effective oversight, competent delivery, and continuous improvement.

5.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for Gas Safety compliance. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage gas risks across all Brent Council housing stock.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

5.2 Gas Safety Management and Assurance

Strategic Responsible Person	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk
	Responsibilities	Holds overall strategic accountability for compliance with Gas Safety legislation and standards. Approves the Gas Safety Policy and Management Plan, secures resources, and ensures that Gas Safety is integrated within the wider Building Safety and Asset Management Strategy. Champions a positive safety culture and ensures that performance and risks are reported to the Chief Executive and corporate governance boards.
Deputy Strategic Responsible	Name	Gary Mitchell
	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk

Person	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the Gas Safety strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that Gas Safety is given appropriate priority within service planning.
Local Responsible Person	Position	Strategic Compliance Manager
	Responsibilities	Provides assurance that operational arrangements for Gas Safety are effective and compliant. Oversees the implementation of the Gas Safety Management Plan, monitors contractor performance, and ensures that records, certificates, and statutory inspections are accurate and up to date. Acts as the principal contact for regulators, auditors, and certification bodies
Compliance Lead (Contract Manager)	Name	John Roche
	Position	Contract and Compliance Manager Mechanical
	Email	John.Roche1@brent.gov.uk
	Responsibilities	Acts as the Council's professional lead for Gas Safety compliance. Manages the delivery of testing, inspection, and remedial programmes, verifies contractor competence, and monitors KPIs and SLAs. Provides expert advice to the Local Responsible Person on technical standards, legislation, and best practice.

5.3 Employees

All employees must cooperate with the Council's Gas Safety arrangements, follow safe systems of work, complete relevant training, and report hazards or faults immediately.

5.4 Residents and Leaseholders

Residents and leaseholders must cooperate with Gas Safety requirements, allow access for inspection and testing, and avoid tampering with fixed installations or equipment.

Where access is not provided for statutory gas safety checks, Brent Council will escalate the matter promptly and may take legal enforcement action to maintain continuous compliance with the annual LGSR requirement.

5.5 Contractors

All contractors must be demonstrably competent and comply with Brent Council's Gas Safety procedures and legal standards. Failure to do so may result in contract suspension, termination, or removal from the Council's approved supplier list.

6. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Compliance performance will be measured across the entire housing stock, including void properties (properties that are temporarily unoccupied). To ensure full visibility of statutory safety compliance, risk exposure, and service performance.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The Gas Safety Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True Compliance). We will utilise such systems to maintain accurate records and produce management reports.
- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

7. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels.

Residents dissatisfied with how a gas safety inspection or repair has been managed may escalate concerns in line with the Brent Council Complaints Policy.

DRAFT