

Cheshire West & Chester Council

# Council Housing

## Gas Safety Policy

Issue date: July 2025

Review date: July 2028



Cheshire West  
and Chester

## 1. Management Information

Approval Date:	July 2025
Next Review Date:	July 2028
Policy Owner:	Janet Lawton, Head of Council Housing Management Service
Responsible Service Area:	Council Housing Management Service
Responsible Director:	Director of Economy and Housing

### Annual Checks

Policy owners should ensure that an annual check of hyperlinks, roles, and names is undertaken. These checks are in addition to formal review process. Please see Policy and Procedure framework guidance for further details.

## 2. Introduction

This policy explains how the Council will manage gas safety within its housing stock, setting out responsibilities, standards, and processes to keep residents and others safe. It demonstrates the commitment to strong compliance, transparency and assurance while supporting safe and sustainable homes.

## 3. Aim of Policy

The aim of this policy is to provide a framework for gas safety management, including assurance that measures are in place to identify, manage and mitigate the risks associated with gas, in respect of tenant's homes. It applies to across the Councils own housing.

This policy supports us in ensuring that we meet our obligations as a landlord, and employer, and seeks to provide assurance that gas safety is appropriately managed. We aim to ensure, so far as reasonably practicable, that our tenants, leaseholders, staff, contractors, and the public are not exposed to any risks to their health, safety and wellbeing from gas.

The policy is relevant to all our staff, tenants, contractors and other persons or stakeholders who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.

When we use the terms 'we', 'our' and 'us' within this policy, we mean the Council unless otherwise stated.

The policy objectives are to:

- Provide clear lines of responsibility for the management of gas safety
- Specify individual responsibilities in the management of gas safety
- Clarify our approach to Landlord Gas Safety Records (LGSRs)
- Clarify the method of reviewing and monitoring gas safety compliance

- Meet our legal and moral obligations as a domestic landlord

#### 4. Strategic context

This policy helps the Council to meet the following local and national strategic aims.

Social Housing Regulations Act 2023 – Consumer Standards

- Quality and Safety Standard
- Transparency, Influence and Accountability Standard
- Tenancy Standard

[CWAC Borough Plan 2024 – 2028](#) - sets out how the Council will work with all its residents to build a stronger future where the Council and residents all play their part in creating thriving, caring and sustainable communities.

The Borough Plan has six missions as follows:

- Starting well - The best start for the borough's children and young people, with improved opportunity, a healthier start, greater resilience in families and the best possible support and care when it is needed.
- Tackling hardship and poverty - More people feel more financially secure as the causes and impact of hardship and poverty are addressed by working alongside residents.
- Resilient people living their best lives - Local people are enabled to flourish, be healthy, happy and independent for longer in supportive communities.
- Opportunity in a fair local economy - Local people and businesses contribute to and benefit from a strong and fair local economy.
- Neighbourhood pride - Residents live in well maintained, connected and safe places with good and affordable homes.
- Greener communities - Individuals, public services and businesses take action to move to tackle the climate emergency, achieve net zero, protect the natural environment and adapt to the impact of climate change.

[Together with Tenants Charter | Cheshire West and Chester Council](#)  
[Tenant Engagement Strategy 2025-30](#)  
[Council Housing Asset Management Strategy](#)

#### 5. Definitions and legislation

Gas safety refers to the practices and procedures aimed at ensuring the safe use and containment of gases, particularly in homes and workplaces. It involves the inspection and maintenance of gas appliances and equipment to prevent hazards such as gas leaks, fires, and carbon monoxide poisoning.

**LGSR - Landlord Gas Safety Record.** This is the formal record produced by a Gas Safe registered engineer following an annual gas safety check. It confirms that appliances, flues and pipework have been inspected and meet safety standards.

## Legislation

The application of this policy will ensure compliance with the regulatory framework and the new consumer standards (safety and quality) for social housing in England, which was introduced on the 1<sup>st</sup> April 2024 and is now applied by the Regulator of Social Housing.

However, the principal legislation applicable to this policy is the Gas Safety (Installations and Use) Regulations 1998. These place a duty on the Landlords to take precautions to ensure, as far as is reasonably practicable, the safety of the people on their premises and in the immediate vicinity.

- Health and Safety at Work Act 1974
- The Gas Installation and Use Regulations 1998 (amended 2018)
- The Gas Industry Unsafe Situations Procedure'
- The Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- The Furniture and Furnishings (Fire Safety) Regulations 1988
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- The Building Regulations 2010
- Electrical Equipment (Safety) Regulations 2016
- The Construction, (Design and Management) Regulations 2015
- Corporate Manslaughter and Corporate Homicide Act 2007
- Reporting of Injuries, Diseases and Dangerous Occurrences
- The Social Housing Regulation Act (2023)
- The Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR)

## 6. How the policy will be delivered

We will take all reasonably practicable steps to prevent and control the risk of gas in the properties that we own and lease. We will provide all our tenants, leaseholders, staff, contractors, and visitors with clear advice on gas safety.

We are committed to keeping our tenants, leaseholders, staff, contractors, and visitors to our properties safe from gas risks and meeting our obligations as a Responsible Person under all current and relevant legislation, whilst also following best practice in relation to gas safety.

## Roles and responsibilities

The Compliance Manager is responsible through delegation for:

- Operational implementation and delivery of this policy.
- Ensuring that any associated procedures are implemented and kept up to date.
- Ensuring that gas safety progress and performance of the Landlord Gas Safety Record (LGSR) programme is monitored, measured and reviewed, and gas

safety performance is reported to the Board.

- Monitoring and reviewing the effectiveness of gas safety training and policy development.
- Ensuring that there is a programme of gas safety works that meets all relevant gas safety related standards, legislation, and best practices.
- Ensuring that there are maintenance and servicing contracts for gas appliances, systems and installations that meet all relevant gas safety related standards, legislation, and best practices.
- Ensuring that routine quality assurance checks in relation to gas safety are undertaken.
- Ensuring that the quality and integrity of gas safety related data meets legislation requirements.
- Ensuring staff under their management are trained and competent in gas safety to a level appropriate to their roles and responsibilities.
- Ensuring that information is provided to tenants, staff, contractors, and other relevant stakeholders on the potential risks associated with gas safety.
- Ensuring that there are formal embedded arrangements for reporting serious incidents related to gas safety, as defined in relevant procedures.

The Compliance Manager will:

- Exercise overall control within their functional area of responsibility to ensure compliance with gas safety legislation and this policy.
- Provide sufficient resources to fulfil their functional area's gas safety responsibilities and to report any non-compliances or inadequately controlled gas risks that require further resources.
- Promote the participation of staff and managers in improving gas safety e.g. by facilitating discussion of gas safety issues at team meetings and one-to-ones.
- Approve or recommend approval of functional area improvement plans with targets for improving gas safety performance, where appropriate.
- Receive any exceptional reports on any urgent gas safety issues requiring an Cabinet decision at functional area level.

The Compliance Manager will:

- Take action to resolve any situations that may adversely affect the gas safety of staff or other persons and rectify any problems within their control or escalate to an appropriate manager, as soon as practicable.
- Give all staff under their control adequate information, instruction, training, and supervision to carry out their duties safely and competently, paying particular attention to new/inexperienced staff and trainees.
- Manage the gas safety performance and training of their direct reports through one-to-ones, appraisals, direct supervision, briefings, etc.
- Seek competent advice, where necessary, and act appropriately on the advice and recommendations given.

All staff will:

- Ensure that they comply with this policy to ensure that the aims, objectives and

intent of the policy are achieved.

- Take reasonable care for the gas safety of themselves and other persons who may be affected by their acts or omissions.
- Report accidents, incidents and near misses with the potential for injury or damage to their line manager or supervisor.
- Co-operate with their managers, colleagues and other relevant persons in matters relating to this policy.

### **Other Relevant Roles and Responsibilities**

The Council's Executive Cabinet has ultimate responsibility for gas safety across all the Council's owned properties, and will:

- Resource and allocate appropriately qualified and suitably experienced persons to assist in discharging our duty for gas safety, and the implementation of this policy.
- Ensure that an effective gas safety strategy is in place, and responsibilities have been delegated to the Head of Housing to support the implementation of this policy.

The Council Housing Management Board has strategic oversight for the management of gas safety and ensuring compliance is achieved and maintained.

The Compliance Manager will ensure that all operational and management staff are sufficiently equipped with the appropriate training to discharge their duties.

The Compliance Manager will utilise the reconciliation dashboard and provide monthly updates on property lists across all systems ensuring stock lists match and reporting any discrepancies to the Gas Compliance Lead for further investigation

The Compliance Manager will liaise with contractors and any relevant staff in relation to the delivery of gas safety works related to maintenance and investment programmes.

The Compliance Manager will ensure, through regular checks and audits, that compliance with this policy, and health and safety legislation in general, is maintained with respect to the implementation of this policy across the organisation.

The Compliance Manager will be responsible for supporting the Compliance Coordinator in the delivery of the LGSR programme and ensuring all Council properties with gas have a valid LGSR by following the gas access procedure.

### **Training and Competence**

All staff are supported by a range of training across the organisation, which as a minimum, shall include general information, on the job training, instructions, briefings and e-learning relevant to their roles and responsibilities.

For this Policy the term 'contractor' will mean those bodies who deliver gas work activities on behalf of the Council. The term 'operative' will mean individuals employed by 'contractors' who are undertaking gas work activities on behalf of the Council. Operatives must be Gas Safe registered engineers who have been checked to verify

they are competent and suitably qualified to work safely and legally with those aspects of gas to which their role relates.

Planned investment works and related gas works are delivered through the Councils Contractors Framework. In addition to checking and verification mechanisms within the original procurement exercise there are a range of procedures for measuring statutory competencies and performance capabilities of these contractors.

Where management information determines that service providers are not complying with statutory or procedural requirements, an escalation procedure will be put into action. This allows the responsible persons to take the necessary action against contractors or operatives with the ultimate sanction being their permanent removal from council activities. Individual managers will be required to ensure the necessary training is provided for staff and that records are kept of attendance and qualification attainment. Timescales and review periods will be attached to this training.

All training, competencies, and qualification attainment, such as Nationally Accredited Certification Scheme (ACS) and gas safety awareness, of contractors and their staff will be checked by the technical staff responsible for the discharging of gas safety statutory compliance on behalf of before the operative is permitted to work on council stock.

### **Resident Engagement**

We will, where applicable and relevant, engage and communicate with our tenants to support them in their understanding of compliance and building safety. This will be in several ways whether that is through our website, tenant compliance portal, social media channels, focus groups, Council Housing Management Board or any other communication channels we choose to utilise.

### **Programme of Works**

We will undertake an annual gas servicing programme to all our domestic properties to meet our statutory requirements.

### **Notifications and Advice**

Where residential homes contain a gas supply, as confirmed by asset data, access arrangements will be instigated and tenants will be contacted not less than six weeks before the next LGSR anniversary date. Once completed, tenants will receive a record of the work through a gas servicing certificate, usually posted to their home by the contractor.

In communal buildings they will be displayed on the notice board.

### **Escalation and Difficult to Access Properties**

Where we encounter access issues, the Council will utilise all available means to access properties, this may include breach of the tenancy agreement or breach of any lease or license or potentially using legal channels to obtain warrants of access through the magistrate's courts where we have continued no access. Should there be a need to utilise the legal process these decisions will be made in conjunction with, and support from our legal team.

## **Non-Compliance**

Any non-compliance with this policy that is identified at a functional level will be formally reported to the Gas Compliance Lead in the first instance.

The Compliance Manager will agree an appropriate course of corrective action with the functional team to address any such non-compliance and, where appropriate, report details of the non-compliance to the Council's Head of Council Housing Management Service.

The Council's Head of Council Housing Management Service will ensure, where appropriate, the Executive team and Board are made aware of any non-compliance so they can consider the implications of this and act as appropriate.

In cases of serious non-compliance with this policy, the Director of Economy and Housing, Head of Council Housing Management Service, Cabinet Member for Homes and Planning, and Council Housing Management Board will consider whether it is necessary to disclose such non-compliance with any relevant regulatory bodies in the spirit of positive self- and co-regulation.

## **Implementation and Communication**

The Compliance Manager will ensure that monitoring arrangements are in place to give assurance that the systems and procedures associated with this policy have been implemented and maintained. Where shortfalls in performance are identified, corrective actions will be taken at the appropriate functional and management level.

If staff become aware of any issues that may impact the effective implementation of this policy, or any associated procedures, they should report this to the Compliance Manager. All relevant feedback will be incorporated into the policy and procedural review process.

The Council will monitor and report performance in compliance with this Policy in the following ways:

- Third party audits
- Internal audits
- Asset Management system outputs and reports
- Performance indicator(s)
- Customer feedback.
- Management reports.

Robust Key Performance Indicators (KPIs) will be established and maintained to ensure we are able to report on our Gas safety performance in relation to this policy.

The following KPIs will be monitored and reviewed periodically, as a minimum, and will be reported to the Councils Management Board, Executive Cabinet and Council Housing Management Board on a monthly and quarterly basis:

- Percentage of properties with a valid gas safety certificate.
- Percentage of properties with combustible appliances that are fitted with a carbon monoxide detector.

We define an LGSR as suitable if it includes:

- A description and location of each appliance or flue that was checked.
- The name registration number and signature of the engineer who made the checks.
- The date the checks were carried out.
- The address of the property where the appliances or flues are installed.
- Your name and address (or agents' where applicable).
- Information on any safety defects and actions needed or taken to fix them.
- The results of all operational safety checks carried out on the appliances.

## **Records**

The Council will keep all necessary records in relation to the management of gas safety including gas servicing records, maintenance works, asset information and audit records for two years.

### **Gas Servicing Records**

Stock asset information in relation to gas installations will be held by The Council on an in-house asset management database. This allows bespoke reports which help the Gas Team to interrogate gas asset information to ensure statutory obligations are being appropriately discharged by the Council. Gas servicing records are provided by the contractor, who sends daily data transfers to update the in-house asset management database. This also allows electronic signatures for the authorisation of certification and works by in-house gas qualified staff. As a minimum the Gas Team will ensure all existing stock assets on the rent roll are periodically reconciled against the in-date Landlord Gas Safety Records (LGSR).

## **7. Equality and reasonable adjustment statement**

We value diversity and work to create an inclusive environment for customers and staff, where everyone has access to the same opportunities. We welcome our responsibility to comply with equalities legislation and regulatory requirements that relate to equity, diversity and inclusion and aim to do more. Through our activities we aim to remove systemic barriers to equal opportunities and eliminate all forms of discrimination, harassment, and victimisation within our organisation.

We are committed to providing excellent customer services, which are fair, equitable and inclusive. As such, we will endeavour to understand and make any reasonable adjustments required for customers in line with our Reasonable Adjustment Statement and the Equality Act 2010. Any reasonable adjustment provided will be recorded and kept under active review.

## **8. Related Documents**

- Building Safety Policy
- HMC Annual Gas Servicing Access Procedure

- HMC Planned Works Gas Procedure
- HMC Gas RIDDOR Reporting Procedure
- HMC Customer's Own Gas Appliance Procedure
- Quality Management System (QMS)

## 9. Equality Analysis

Results of EA / Actions taken forward to mitigate any potential negative impacts	Inform that this policy can be provided in alternative formats.  Inform about the ongoing equality and diversity training for staff in the delivery of this policy.
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## 10. Consultation and Business Intelligence

The policy was created in consultation with the Council's tenants, leaseholders and staff.

## 11. Monitoring and review

The Council Housing Management Board has responsibility for the monitoring and review of this policy. This policy will be reviewed every three years starting from the date it is approached and adopted.

## 12. Approval and Review History

The approval route for all policies and procedures is via the Cabinet Member for Homes and Planning who has delegated powers for policy approval from the Council's Executive Cabinet.

Date	Version	Approved by
30 July 2025	V1	Cabinet Member for Homes and Planning
29/09/2025	V1.2	Cabinet Member for Homes and Planning
28/05/2026	V1.3	Cabinet Member for Homes and Planning

## 13. Document Revision History

Date amended	Version	Key Changes
25/09/2025	V1.2	Revised version to take into account the insourcing of the housing management service from ForHousing.
22/05/2026	V1.3	Policy revised following insourcing of housing management services, updates to revised service structure and contact

		information. No substantive changes have been made to the policy.
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