



## Gas Safety Policy

<b>Approved by:</b>	Leadership Management Team
<b>Effective date:</b>	11 <sup>th</sup> November 2025
<b>Review date:</b>	November 2028
<b>Policy developed by:</b>	Property Team

<b>1</b>	<b>Introduction</b>
1.1	Hornsey Housing Trust (HHT) recognises the risks to health and safety of carbon monoxide poisoning or risk of fire / explosion caused by gas appliances and flues which have not been properly installed or maintained.
1.2	In recognising the above risks, HHT always adopts a safety-first approach and provides practical advice to all of its tenants on what to do in the event of a gas emergency.
1.3	Where HHT receives a call from a tenant with a suspected gas leak or fumes HHT will transfer the tenant direct to Cadent (formerly the National Grid).
<b>2</b>	<b>Purpose of the Policy</b>
2.1	This Policy sets out HHT's responsibilities to comply with the relevant legislation and associated regulatory guidance on the safe installation, maintenance and use of gas systems, including gas fittings, appliances and flues in properties it controls and manages.
2.2	<p><b>Key Legislation and Guidance:</b></p> <ul style="list-style-type: none"> <li>• Gas Safety (Installation and Use) Regulations 1998</li> <li>• Gas Safety (Installation and Use) (Amendment) Regulations 2018</li> <li>• Health and Safety at Work etc. Act 1974</li> <li>• Management of Health and Safety at Work Regulations 1999</li> <li>• Housing Act 2004 – Housing Health &amp; Safety Rating System (HHSRS)</li> <li>• Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)</li> <li>• Building Regulations (Part J)</li> <li>• Homes (Fitness for Human Habitation) Act 2018</li> <li>• Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022</li> <li>• Gas Safe Register Technical Bulletins (including TB 008)</li> <li>• HSE Approved Codes of Practice and Guidance</li> </ul>
2.2.1	Specific reference has also been made to relevant the Health and Safety Executive Approved Codes of Practice and Guidance.
2.2.2	<p>The Gas Safety policy should be read in conjunction with:</p> <ul style="list-style-type: none"> <li>• HHT Health and Safety Policy</li> <li>• HHT Repairs Policy</li> <li>• HHT Fire Safety Policy</li> </ul>
2.2.3	<p>In regard to the above legislation a summary of HHT's duties include requirements to:</p> <ul style="list-style-type: none"> <li>• Ensure gas fittings and flues are maintained in a safe condition and that appliances are serviced in accordance with manufacturer's instructions or at least annually (unless otherwise advised by a Gas Safety registered engineer)</li> <li>• Ensure an annual safety check is carried out on each gas appliance / flue and carry out these checks within 12 months of a tenancy commencement date, unless the appliances in the property have been installed for less than 12 months (in which case they should be checked within 12 months of their installation date)</li> <li>• Have all installation, maintenance and safety checks carried out by a Gas Safe registered engineer</li> <li>• Keep a record of each safety check for at least two years</li> <li>• Issue a copy of the latest Landlords Gas Safety Record (safety check) record to HHT tenants within 28 days of the check being completed or to any new tenant before they move in</li> <li>• Maintain a Landlords Gas Safety Record (LGSR) for each property under HHT's control and amend the register in accordance with any changes made to the property (i.e. installation of or removal of gas supply or appliances)</li> </ul>

<p>2.2.4</p> <p>2.3</p> <p>2.3.1</p> <p>2.4</p> <p>2.4.1</p> <p>2.4.2</p> <p>2.4.3</p>	<p>The application of this Policy ensures that HHT meets compliance with the outcomes of the Regulatory Framework for Social Housing in England introduced by the Regulator for Social Housing as outlined below:</p> <ul style="list-style-type: none"> <li>• (Registered Providers must) meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes</li> </ul> <p><b>Access and Communication</b></p> <p>HHT is committed to ensuring that the services it provides are accessible to everyone. HHT will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for HHT or use its services.</p> <p><b>Equality, Diversity and Inclusion</b></p> <p>HHT is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following protected characteristics; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Marriage and Civil Partnership, Pregnancy and Maternity, and Religion and / or Belief.</p> <p>HHT also recognises that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, health condition, or any other matter which causes a person to be treated with injustice.</p> <p>HHT will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make every effort to ensure staff and others with whom HHT works, will adhere to the central principles of the Human Rights Act (1998).</p>
<p><b>3</b></p>	<p><b>Statement of Intent</b></p>
<p>3.1</p> <p>3.2</p> <p>3.3</p>	<p>HHT will comply with all legal and regulatory requirements in meeting its responsibilities to ensure gas safety and use of solid and LPG fuel systems in the properties it owns or manages.</p> <p>To satisfy itself, tenants, contractors and other users of its buildings that it reaches the highest standards in gas safety, HHT will operate a comprehensive gas safety management system and supporting procedures that are appropriately resourced and supported by cross team / HHT working practices.</p> <p>The above procedures will ensure HHT operates 'firm but fair' working practices when attempting to ensure Landlords Gas Safety Records are completed and valid gas safety certificates are maintained at all times. To this effect HHT will:</p> <ul style="list-style-type: none"> <li>• Inform all tenants in writing (and in their preferred format) 56 days before the expiry of the Landlord Gas Safety Record (LGSR) or equivalent for solid or LPG fuels and give an initial appointment date for a new safety check (tenants can request alternative appointments if inconvenient)</li> <li>• Make numerous attempts to contact the tenant via letter, phone, email and / or personal visit if an appointment cannot be arranged</li> </ul>

	<ul style="list-style-type: none"> <li>• Monitor the position of all properties where gas safety checks remain outstanding through monthly meetings attended by cross-functional team including contractors and continue efforts to contact tenants and arrange access. HHT will deal with any suspected abandoned properties in line with it's the Suspected Abandoned Properties Procedure</li> <li>• Consider using the emergency access procedure as provided within the terms of the tenancy agreement</li> <li>• Throughout the above processes work with external agencies and advocacy groups where tenants are known to be vulnerable for any reason and require additional support</li> <li>• Clear Protocol for Legal Action: If all other efforts fail, the policy should clarify that seeking an injunction will only be done after multiple attempts to work with the resident and their family or caregivers. It could also involve collaboration with social services to assess the individual's situation before moving forward with legal measures.</li> <li>• Safeguarding Measures: Before pursuing an injunction, ensure safeguarding procedures are in place, such as involving a social worker, reviewing the mental capacity of the resident, or assessing any potential risk factors.</li> </ul>
3.4	HHT will set stringent and challenging targets in providing gas safety services with a minimum of top quartile performance when benchmarked against similar housing providers and will strive to be an exemplar of best practice for the housing sector in carrying out LGSR checks.
3.5	HHT will ensure that all operatives that are employed to carry out installation, removal, maintenance or safety checking work to gas fittings or flues are suitably competent and are Gas Safe registered in accordance with regulation 3(3) of the Gas Safety (Installation and Use) Regulations 1998 (with LPG, HETAS and Commercial Gas specialisms for solid and LPG fuels as required).
3.6	HHT will ensure any contractor it employs to carry out installation, removal, maintenance or safety checking work to gas fittings or flues and solid / liquid fuel systems, are suitably competent and have Gas Safe registered operatives through its procurement and preferred supplier processes.
3.7	In order to maintain its excellent track record of promoting gas safety, HHT will not grant any new permissions for tenants to install gas fire appliances in their properties via the 'request to make alterations procedures'.
<b>4</b>	<b>Policy</b>
4.1	<b>HHT Responsibilities</b>
4.1.1	As a duty Holder, HHT will fulfil its legal responsibility to deal with the safe installation, maintenance and use of gas systems, including gas fittings, appliances and flues in the domestic and commercial premises they own and control (as per Regulation 36 of the Gas Installation and Use Regulations).
4.1.2	Although, HHT may employ external contractors to carry out this work on its behalf, it remains the responsible body for ensuring gas safety to tenants and other users of the buildings it owns or manages.
4.1.3	In fulfilling its gas safety duties (and with specific reference to its responsibilities as a landlord and as per Regulation 36 of the current Gas Safety Installation and Use Regulations), HHT will take action in the following areas (see 3.2 to 3.11).

4.2	<p><b>Gas Safety Maintenance</b></p>
4.2.1	<p>HHT will ensure the safe maintenance of gas appliances, flues and installation pipework installed, and solid / LPG fuel systems in premises under its control via an ongoing programme of regular / periodic inspections, together with any necessary remedial work. This will include specific maintenance requirements defined in manufacturer instructions or where this is not available via a check of the physical condition of the appliance, installation pipework, air vents and any flue deterioration, testing and remedial action (on a prioritised risk assessment basis).</p>
4.3	<p><b>Annual Safety Checks (Landlords Gas Safety Record – LSGR)</b></p>
4.3.1	<p>HHT will carry out annual safety checks on all properties at no more than 12-month intervals (this is in addition to any safety checks required when an appliance is first installed). In line with Gas Safety (Installation and Use) (Amendment) Regulations 36a 2018, HHT has implemented an ‘MOT-style’ approach to the annual inspection. Under this new legislation, landlords can have the check completed any time in the 2 months before the current certificate expires and still retain its original expiry date. See section 2.3 for the approach and process HHT uses when carrying out annual safety checks or maintaining the LGSR. As a minimum the LGSR will contain:</p> <ul style="list-style-type: none"> <li>• Description and location of each appliance and / or flue checked</li> <li>• Name, registration number and signature of the engineer who carried out the check</li> <li>• Date on which the appliance and / or flue was checked</li> <li>• The address of the property at which the appliance and / or flue is installed</li> <li>• HHT’s full address and contact details</li> <li>• Any defect identified and any action required or taken to fix it</li> <li>• Confirmation of the results of operational safety checks carried out on the appliances</li> </ul>
4.3.2	<p>The above checks will be carried out in all domestic properties owned or managed by HHT, including those that may have a gas supply, but where this is not used. The only exceptions to these requirements are some high-rise blocks where HHT has removed the gas supply and Retirement Living premises where there is no gas supply to individual properties and properties that are off the gas infrastructure e.g. rural areas. HHT will, however, conduct annual safety checks in Retirement Living premises where there is gas fired communal hot water systems or communal cooking facilities.</p>
4.3.3	<p>Where any defects are identified during the annual safety check that are the responsibility of HHT to rectify, HHT will ensure prompt remedial action if deemed ‘Immediately Dangerous’ or ‘At Risk’ and will ensure the appliance is not used until the fault is remedied.</p>
4.4	<p><b>Safety Checks Before Tenancies Commence</b></p>
4.4.1	<p>When HHT are informed of empty properties, it will cap off the gas supply on the next working day or sooner if possible and produce a cap-off certificate before void works commence to bring the property back up to a lettable condition. HHT will ensure a full gas safety check is carried out at the start of any new tenancy and that the new tenants receive a copy of the current LGSR (gas safety certificate) within 28 days of moving in.</p>

4.5	<b>Gas safety checks for new build properties</b>
4.5.1	HHT will cap off gas supplies in all new build properties at handover and the supply will be reconnected once the property is occupied by the new tenant / buyer. HHT will ensure any unoccupied property used for sales / viewing purposes will be maintained the same as with an occupied property.
4.6	<b>Tenants' own gas appliances</b>
4.6.1	<p>In circumstances where Gas Safe registered engineers (carrying out safety checks on HHT's behalf) discover that a tenants own gas appliances may be faulty, they will:</p> <ul style="list-style-type: none"><li>• Inform the tenant and issue a written warning notice that the appliance is unsafe, and that continued use is an offence</li><li>• Attempt to persuade the tenant that they (the engineer) should disconnect the appliance until such time as the tenant can arrange for their own Gas Safe registered engineer to repair the existing appliance or install a new safe appliance</li><li>• Label the appliance as unsafe where the above consent is refused</li><li>• Contact the gas supplier and inform them of their actions - (who may use powers to enter the property and take action to avert danger to life (and property))</li><li>• Inform HHT of all actions taken</li></ul>
4.6.2	HHT will not permit the use of or storage of compressed gas or Liquid Petroleum Gas (LPG) for portable appliances within its properties or communal areas unless in exceptional circumstances i.e. oxygen for medical reasons.
4.6.3	If a tenant is required to use and store compressed gas for medical reasons (i.e. oxygen), we will advise them to contact the local Fire and Rescue Service who will arrange to carry out a home fire safety check.
4.6.4	<p>In addition, Gas Safe engineers working for or on HHT's behalf will:</p> <ul style="list-style-type: none"><li>• Carry out a visual check of gas cooking appliances</li><li>• HHT has an obligation under the Gas Safety (installation and Use) Regulations 1998 to ensure that chimneys and flues in its properties are maintained as being fit for purpose. Where tenants have installed their own free-standing outset, conventional fire (with the landlord's permission and where the manufacturer's instructions are available), HHT will remove the fire and enable a full inspection of the flue to be carried out</li><li>• Where tenants have installed an Insert Decorative Flue Effect (DFE) fire, HHT will, with the tenants' permission disconnect the fire via an isolation valve (where one exists). The tenant will then be required to arrange for their own Gas Safe Registered Engineer to inspect the fire and flue (at their own expense) and pass on the inspection certificate to HHT once complete. If tenants refuse permission for the fire to be disconnected HHT will label the fire as being unsafe for use</li></ul>

	<ul style="list-style-type: none"><li>• HHT will also inspect Carbon Monoxide detectors in domestic properties (either portable or hard wired) where they exist.</li></ul>
4.6.5	Where a new kitchen is being installed, HHT will disconnect and reconnect gas cookers for tenants as part of kitchen installation work provided it is safe to use. If the gas cooker is found to be unsafe to use, HHT will advise the tenant and apply Gas Industry Unsafe Procedure (GIUSP) as required by the Gas Safety (Installation and Use) Regulations 1998.
4.6.6	For any appliance that is classified as 'At Risk', or 'Immediately Dangerous' (ID), the gas operative will (with the permission of the tenant) disconnect or isolate it from the gas supply and advise the tenant that it is an offence to use the appliance until it has been repaired or replaced by a Gas Safe Registered operative. If the permission is refused, the operative will inform the client and escalate the case to Cadent (formerly the National Grid).
4.7	<b>Maintain Gas Safety Records</b>
4.7.1	HHT will maintain records of all annual safety checks undertaken for a minimum period of two years from the date of the inspection and ensure tenants receive a copy LGSR as soon as is reasonably practical (either electronically or in paper copy and specifically in paper copy if requested by the tenant) after the safety check and no more than 28 days for new tenants moving in. Records will be kept securely and will not be shared with third parties without the tenants' consent.

4.8	<p><b>Potential Carbon Monoxide Poisoning</b></p>
4.8.1	<p>In line with the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, HHT have installed CO Detectors in any room with a gas appliance (except for kitchens where a gas cooker only is present) and will test these during the annual Gas Safety check programme. In compliance with the British Standards (7967) guidance, if a Gas Safe registered engineer acting on HHT's behalf or call handlers working in HHT are contacted by a tenant reporting fumes, smells, spillage / leakage of gas combustion products or activation of Carbon Monoxide (CO) detectors, they will advise them to seek medical assistance immediately to verify if CO is the cause of their illness (and report the results back to HHT at the earliest opportunity - HHT will keep a record of the conversation with the tenant). Call handlers or engineers working on site will also transfer the call to Cadent (formerly the National Grid) who will arrange to make safe the gas supply as required.</p>
4.8.2	<p>HHT employs an independent specialist contractor to conduct a full inspection of the installation to identify the cause of suspected Carbon Monoxide release. In compliance with the British Standard Guidance, HHT will subsequently, raise an order for the gas supply to be reconnected and for CO detectors, appliances and flue to be checked (to British Standard 7697) and any remedial work to be carried out.</p>
4.9	<p><b>Inspection of Flues in Void Spaces (behind walls or ceilings)</b></p>
4.9.1	<p>In compliance with the Gas Safe Register Technical Bulletin 008, HHT will ensure all Gas Safe registered engineers that carry out gas safety inspections on its behalf, can see the flue (which takes fumes away from an appliance) as part of their inspection. This will apply in all cases even where the flue may be concealed behind walls, ceilings or panelling (void spaces).</p>
4.9.2	<p>Where Gas Safe registered engineers cannot see flues to inspect them safely, they will classify appliances as 'At Risk' and will turn off boilers until such time as appropriate inspection hatches can be fitted to the property. Where this situation is likely to occur, HHT will arrange for the supply of temporary heaters at the tenant's request or if adverse weather conditions are expected.</p>
4.9.3	<p>The construction date and type of HHT domestic properties is such that flues concealed in void spaces are not a common occurrence, however, where they are in existence HHT will install the necessary inspection hatches as the need for them is discovered via the annual safety inspections.</p>
4.10	<p><b>Independent Checking of Gas Safety arrangements</b></p>
4.10.1	<p>To seek assurances that the gas safety work HHT commissions maintains the highest standards, HHT require contractors carrying out this work on its behalf to quality check a percentage of its completed gas safety inspections on a risk-based approach. HHT will also ensure a percentage of all completed gas safety inspections are quality checked via an independent external agency.</p>

4.11	<b>Boiler Replacement Programme</b>
4.11.1	Future boiler replacements will be prioritised according to the HHT Lifecycle projections, taking into account condition including an assessment of risk (on an individual basis) and availability of budget. Properties where tenants have refused Decent Homes works to be completed may also be prioritised when they become void (empty).
4.11.2	Where tenants are granted permission to install their own systems, they may be entitled to compensation under the 'Right to compensation for improvement' regulations and subject to the depreciation formula, when the tenancy is terminated.
4.11.3	Where HHT has just reason to suspect properties are abandoned, gas fired boilers will be fitted with additional security measures to prevent theft until abandonment procedures are complete or HHT is satisfied that the tenant is occupying the property as per the terms of their tenancy agreement.
4.12	<b>No Gas Properties</b>
4.12.1	In addition to the duties to carry out annual safety checks of properties with a known gas supply under the Gas Safety (Installation and Use) Regulations, HHT will also check properties where the asset management records indicate no gas supply exits or it has previously been removed.
4.12.2	HHT performs checks of 'no-gas' properties as a matter of good practice, rather than a legal obligation.
4.12.3	HHT will make all reasonable endeavours to carry out checks on properties that are deemed higher risk of having a supply installed (without the tenant informing HHT) on a two-yearly cycle. If inspections indicate a supply has been installed in a property it will then be included on the register for annual checking.
4.12.4	This will include areas where suppliers are known to be active in carrying out installation works and properties where no inspection has taken place in the previous two-year period. Where other elements of HHT's asset management and checking regime ensure buildings are inspected more frequently and it is known that no gas supply exits, it will not be necessary to conduct 'no gas' inspections.
4.12.5	When carrying out 'no-gas' inspections HHT will also ensure at least one smoke alarm is equipped on each storey of the property where there is a room used as living accommodation (i.e. in a standard two storey house, a smoke alarm should be fixed to the ceiling in the downstairs hallway and the upstairs landing).

<b>5</b>	<b>Implementation Responsibilities</b>
5.1	All HHT staff have responsibility for ensuring gas safety for persons that use buildings it owns and or controls in line with general Health and Safety regulations. Whilst not all staff will have specific duties in regard to maintaining the LGSR, they will need to have an awareness of the Policy and supporting procedures to deal with any tenant queries that may arise.
5.2	The Repairs & Compliance Manager and other staff with specific responsibility for overseeing day to day gas safety operations to ensure HHT's compliance with the requirements. The Repairs & Compliance Manager will have specific responsibilities to: <ul style="list-style-type: none"> <li>• Ensure the procurement process for any contractors employed by HHT for any installation, maintenance or gas safety testing works reach the standards required by the Gas Safe Register</li> </ul>
5.3	The Head of Property will be responsible for any investigations following any confirmed major incidents involving gas escape from HHT premises or suspected CO poisoning including liaising with gas suppliers, emergency services and the Health and Safety Executive as required.
<b>6</b>	<b>Performance</b>
6.1	HHT measures performance on all aspects of gas safety management through a comprehensive set of key performance indicators which includes the percentage of properties with a current LGSR in place.
6.2	HHT collates the above performance information and provides reports to tenants including benchmark information comparing performance to other housing providers on a quarterly basis.
<b>7</b>	<b>Consultation</b>
7.1	All HHT staff have been consulted in the development of the Policy and specific input of technical advice has been sought from those staff with operational knowledge of gas safety management.
<b>8</b>	<b>Review</b>
8.1	The Policy will be reviewed at least once every <b>Three Years</b> from the date of approval to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on the obligations of HHT.