



## Organisational Policy

### Heating Policy

#### ***Our Commitment***

*Argyll Community Housing Association Group is committed to provide equal opportunities across all services and to avoid discrimination. This policy is intended to assist Argyll Community Housing Association (ACHA) and Argyll Homes for All (AHFA) to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.*

***This policy can be made available in other formats, for example in large print, audio-format or Braille: the document may also be available in other languages, in full or summary form, as appropriate.***



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#### Section 1 – Context

1.1 Argyll Community Housing Association Ltd (ACHA) is a registered social landlord with over 5000 properties within Argyll and Bute area.

1.2 We upgrade our tenants' homes and install new heating systems when required.

#### Section 2 – The Law and Good Practice

2.1 It is essential to ensure that the properties meet the Scottish Housing Quality Standard and the EESSH Energy Efficiency in Social Housing Standard (EESSH) rating in the most cost effective manner and that the ongoing maintenance of heating systems is robust.

2.2 The Scottish Housing Quality Standard has been superseded by the EESSH standard. The Energy Efficiency Standard for Social Housing (EESSH) aims to improve the energy efficiency of social housing in Scotland. It will help to reduce energy consumption, fuel poverty and the emission of greenhouse gases. The standard will also contribute to reducing carbon emissions by 56% by 2020, 75% by 2030, 90% by 2040 and net-zero emissions of all greenhouse gases by 2045, in line with the requirements set out in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.

The EESSH is based on the minimum Energy Performance Certificate (EPC) rating. EPCs are calculated using the Standard Assessment Procedure (SAP) for energy rating of dwellings 2009 methodology. As SAP 2012 is now being widely used, the Building Research Establishment Ltd (BRE) was commissioned to compile a conversion table which details the energy efficiency ratings required to meet EESSH using both SAP 2009 and SAP 2012.

#### 2.3 Ratings

Minimum energy efficiency (EE) ratings are shown in the table below and vary depending on the type of property and the fuel used to heat it. SAP ratings are expressed on a scale of one to 100; the higher the number, the lower the running costs.

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#### Minimum SAP ratings to pass the EESSH

Dwelling type	EE rating (SAP 2009)		EE rating (SAP 2012)	
	Gas	Electric	Gas	Electric
Flats	69	65	69	63
Four-in-a-block	65	65	65	62
Houses (other than detached)	69	65	69	62
Detached	60	60	60	57

2.4 The Scottish Government have identified a range of improvements that they refer to as “reasonable measures”. The following relate to heating systems:

- condensing boilers
- heating controls
- storage heaters (or switching to more efficient storage heaters)
- thermostatic radiator valves

#### Gas Central Heating

Under the Scotland Act, heat policy, energy efficiency and building standards are devolved, however regulation of energy markets, oil and gas, electricity and gas networks and consumer protection remain reserved to the UK Government. As such, the Scottish Government can set standards for energy efficiency, regulate technical aspects of district heating, and can introduce measures to decarbonise heat in buildings not using mains gas. It is not, however, within the Scottish Government's competence to require the decarbonisation of the heat supply of those currently using mains gas. In this area, the Scottish Government will continue to work with the UK Government to identify and investigate the best way forward. The Scottish

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Government have also recently published their Vision for Scotland's electricity and gas networks between 2019 and 2030 which discusses the potential role of the gas network in providing low carbon heat in the future.

The Scottish Government's Climate Change Plan and Heat Policy Statement outline the overarching approach to decarbonising heat.

The Scottish Government has been consistent in its support for energy efficiency and low carbon heat, and continues to focus its efforts where it has control of the necessary levers. As such, over the short- to medium-term we are focussing on improving the energy efficiency of all buildings, deploying appropriate low carbon heat solutions in individual buildings that do not use mains gas and developing heat networks where appropriate. ACHA will reflect this overarching approach and where possible if we can install a renewable heating system instead of gas we endeavour to do so.

2.5 For harder to treat properties, additional measures may need to be considered including using renewable technologies.

2.6 A range of renewables solutions such as

- biomass,
- solar hot water,
- photovoltaic panels,
- air/ground source heat pump,
- micro combined heat and power, may be considered.

### Section 3 – Our Policy Objectives

3.1 ACHA aims to improve, develop and manage quality affordable homes across Argyll and Bute by working in partnership.

3.2 The specific objectives of this Policy are to achieve the following:

1. To comply with the Scottish Housing Quality Standard and the Energy Efficiency Social Housing Standard by installing the most cost effective heating choices that deliver those standards.
2. To reduce fuel poverty and improve the comfort of our tenants' homes.
3. To achieve value for money

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#### Section 4 – Implementing our policy objectives

##### 4.1 Heating Choice

The choice of the type of heating installed in our tenant's home is a key component in meeting the required energy efficiency rating. Therefore, the following policies are applied to heating choices:

1. The tenant will be given a choice of heating type to allow for the location and fuel sources available.
2. The heating choices that can be targeted at our properties are, generally, gas boiler heating, electrical storage heating, oil boiler heating, solid fuel central heating and air source heat pumps. However, these choices will require to be limited if ACHA is to cost effectively upgrade the heating systems and meet the energy efficiency rating.
3. All properties will be subject to an assessment of their energy efficiency rating, and only those heating systems that effectively contribute to meeting the energy efficiency rating will be offered.
4. If gas is available, then the heating upgrade offered will be gas central heating.
5. If gas is available through an economic infill to the existing infrastructure, then the heating upgrade offered will be gas central heating.
6. Solid Fuel Heating systems will be only be upgraded where the property can cost effectively meet the energy efficiency rating and the house currently has solid fuel central heating.
7. Oil Heating systems will be only be upgraded where the property can cost effectively meet the energy efficiency rating and the house currently has oil central heating.
8. Air sourced heat pumps will be offered in properties that are difficult to meet standard through any other traditional upgrades.
9. No dual fuel heating systems will be supported. Only one heating type will be upgraded. This will apply particularly to houses which have an open solid fuel fireplace and another central heating installation. In these instances, the most effective heating system will be installed and the open fire place

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removed. If the tenant wishes to retain their open fire, then this will be allowed. However, the tenant will be responsible for the cost of any works required to the open fire such as re-lining the flue. We will continue to service the open fire to ensure that we meet our statutory responsibilities and ensure the safety of our tenants.

10. Normally any gas focal fires will be removed. However, if the tenants have gas central heating and wishes to retain their gas focal fire this will be allowed. However, the tenant will be responsible for the cost of replacing the focal fire when required. We will continue to service this appliance to ensure that we meet our statutory responsibilities and ensure the safety of our tenants. An ex-gratia policy has been approved by the Board. It allows for an ex-gratia be paid to tenants who are losing a focal fire – gas or solid fuel.
11. These heating choices will apply and good information will be supplied to tenants to ensure they understand the reasons these heating systems are offered. However, we recognise that there may be a few occasions where our tenants appeal against the heating system offered. An appeal panel has been established and any appeals will be passed to the Director of Investment and Regeneration and an appeals panel will make a final decision

#### 4.2 Energy Efficiency Upgrades

The upgrade of heating systems will be supported by technically feasible and appropriate energy efficiency upgrades that can be delivered without any disproportionate costs.

- Accessible loft spaces will be upgraded to 270mm loft insulation depth where the current level is 100mm depth or less or the roof is being upgraded. Note: All properties identified with less than 200mm in the Stock Condition Survey will be targeted for potential upgrade
- Cavity Wall Insulation will be installed where the current cavity is not currently filled and the property is suitable for cavity wall insulation. Exposed properties will be assessed carefully before any cavity wall insulation is installed. Some properties have suffered dampness where poor installations of cavity wall insulation have been identified as an ancillary cause. Other forms of cavity wall insulation will be installed, such as glued bead instead of blown fibre, to prevent the reoccurrence of

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dampness. Additional works to the external fabric may be required to prevent any transfer of dampness into the cavity.

- Options for insulation upgrades, such as internal wall insulation, external wall insulation, underfloor insulation will be considered where there is no other cost effective way of meeting the energy efficiency rating or the property is subject to a related upgrade, such as a whole house refurbishment.

#### 4.3 Renewable Options

There is benefit in further exploring the Feed in Tariff and the Renewable Heat Initiative) which may offer funding support for installations such as PV panels, solar panel, air source heat pumps, wind turbines etc. These type of upgrades will only be considered where they cost effectively contribute to meeting the required energy rating.

#### Section 5 – Performance management

5.1 ACHA operates within a performance management framework which reports to and aims to meet the requirements of our tenants, Board of Management, the Scottish Housing Regulator and the Scottish Social Housing Charter.

5.2 As required by Section 31 of the Housing (Scotland) Act 2010, the Scottish Social Housing Charter sets out the standards and outcomes that all social landlords should aim to achieve when performing their housing activities:

##### □ Charter Ref.1 – Equalities

Social landlords perform all aspects of their housing services so that:

- *Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.*

##### □ Charter Ref.3 – Participation

Social landlords manage their businesses so that:

- *Tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.*

##### □ Charter Ref.4 – Quality of Housing

Social landlords manage their business so that:



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- *Tenants homes, as a minimum, meet the Scottish Housing Quality Standard (SHQS) by April 2015, and continue to meet it thereafter and are always clean, tidy and in a good state of repair when they are allocated.*
  
- 5.3 We use Regulatory and local performance indicators to monitor and report on our heating policy. The relevant indicators include: -
  - Number and percentage of properties with valid gas safety certificate
  - Progress toward completion of the Scottish Housing Quality Standard including impact of exemptions and abeyances.
  - Progress towards completion of the Energy Efficiency Standard for Social Housing
  
- 5.4 Internally, performance will be monitored monthly by ACHA's Senior Management and bi-monthly by the Board of Management and local Area Committees. Performance information will also be provided, on a regular basis to our tenants, via the Tenants Newsletter and to the Tenants Panel. We will agree the approach regarding the publishing of Performance information with our tenants and service users and this will be reported annually by October of each year.
  
- 5.5 Externally, the Scottish Housing Regulator will monitor performance in terms of outcomes and standards achieved in line with the requirements of the Scottish Social Housing Charter. We will, annually, submit key performance information on our achievements to the Regulator.
  
- 5.6 In order to ensure that this policy remains fit for purpose and continues to meet Charter requirements, a Tenant's Scrutiny Panel will monitor and review the performance standards.

### Section 6 - Development and training

- 6.1 Staff involved in the delivery, procurement and organisation of the heating installations will be suitably qualified and trained.
- 6.2 All ACHA staff will undertake mandatory Customer Care and Diversity training.
- 6.3 We will ensure that all contractors working for us are qualified to carry out all work requested in a safe and appropriate manner.

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#### Section 7 – Our positive action initiatives

None apply

#### Section 8 – Dealing with complaints

8.1 We value complaints and endeavour to use information from them to help us improve our services. If a tenant, factored owner or any other customer is unhappy with our repairs and maintenance service we will deal with the matter through our Complaints Handling Procedure.

#### Section 9 – Consultation and review procedures

9.1 This policy will be reviewed every three years or earlier if required due to substantive changes in legislation or regulatory requirements.

9.2 As part of the review process formal consultation will take place with relevant stakeholders who include: -

- Tenants
- Area Committees
- The Tenant Consultation Register
- The Tenants Panel
- Staff

9.3 The outcome of the review process will be made available via our tenants' newsletter and on our website.

#### Section 10 – Confidentiality and data protection

10.1 All information relating to the tenant or factored owner, provided by us to contractors or other third parties, will be done so only to fulfil the obligation of this policy.

10.2 We will ensure that we meet the requirements of GDPR February 2019.