

Bromford Flagship

Non-Gas Heating Policy

Policy Statement & Purpose

The purpose of this policy is to demonstrate Bromford Flagship's commitment to ensuring the risk to people, buildings and the wider business are reduced as far as reasonably practicable while ensuring that all legislative requirements are met.

Our policies are supported by other documents including detailed procedures and processes to ensure that the policies are fully embedded into routine working practice.

Bromford Flagship are responsible for the servicing and maintenance of relevant non-gas space heating, domestic hot water (DHW) & communal hot water (CHW) installations and appliances installed within its rented housing stock and communal blocks. In doing so Bromford Flagship are fully committed to meeting all applicable statutory & regulatory requirements, including best practice standards in non-gas fuel safety management, ensuring continual improvement in compliance performance and adopting a risk averse approach for any non-approved deviation from this Policy. Our *Board, as duty holder will receive assurance of statutory, legislative, and regulatory compliance at regular intervals for their review and scrutiny.

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1. Scope

This Policy covers Bromford Flagship Limited and its subsidiaries [excluding Gasway].

Bromford Flagship have a duty to ensure that all heating appliances which includes oil, solid fuel, air and ground source heat pumps (ASHP & GSHP), electric boilers, electric heating appliances, unvented cylinders, pipework, flues, and ventilation provided are safely maintained and annually safety checked by appropriately qualified contractors and engineers.

We will ensure that we fully comply with our legislative and statutory duties in the maintenance of non-gas appliances, flues, pipework, fittings, systems and controls.

Our policy and processes ensure that our contractors and our own qualified engineers provide a high-quality service in terms of competence, customer advocacy and maximisation of the life of our assets and their components. The policy provides assurance to Bromford Flagship that measures are in place to ensure compliance with the regulations and to identify, manage

**References to "the Board" in this document and our governance arrangements mean the coterminous Board acting as the Boards of Bromford Flagship Limited (BFL), Bromford Housing Association Limited (BHA), Flagship Housing Limited (FHL), Merlin Housing Society Limited (MHS) and Bromford Home Ownership Limited (BHO).*

and/or mitigate risks associated with non-gas appliances, flues, pipework, fittings, systems and controls.

The policy is relevant to all Bromford Flagship colleagues, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon Bromford Flagship to maintain a safe environment for customers and colleagues within the home of each customer and within all communal areas of buildings.

Bromford Flagship will follow a systematic approach to the management of non-gas fuel safety to ensure it meets the requirements set out in any relevant regulations. This is to ensure the safety of customers, leaseholders, colleagues, and members of the public.

This Policy covers both domestic and commercial appliances, flues, pipework, fittings, systems and controls where Bromford Flagship as Landlord retains a responsibility to repair and maintain. (e.g. communal and district heating systems).

2. Legislative Requirements

The application of this policy will ensure compliance with the Safety and Quality Standard (consumer standards) April 2024

2.1 Legislation

The principal legislation applicable to this policy are as follows:

- Building Regulations 2010 including all approved documents
- British Standard BS7671:2018 (18th Edition) IET Wiring Regulations
- Health & Safety at Work Act (HASAWA) 1974
- Management of Health & Safety at Work Regulations 1999
- The Construction (Design and Management) Regulations 2015
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Electrical Equipment (Safety) regulations 2016
- The Electricity at Work Regulations 1989
- Supply of Machinery (Safety) Regulations 2008 and BSEN 12453:2001
- The Housing Act 2004 – Including (HHSRS)
- Landlord & Tenant Act 1985
- Building Safety Act 2022
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

2.2 Codes of Practice & British Standards

The principal Codes of Practice and British Standards applicable to this policy are:

- BS5410 Part 1 (2014) Oil Firing Technical association (OFTEC).
- BS8511 2010 – Code of practice for the installation of solid fuel heating.
- BS7593:2019 Code of practice for the preparation, commissioning and maintenance of domestic central heating and cooling water systems
- Code of Practice for the Management of Electrotechnical Care in Social Housing- January 2019
- The Microgeneration Certification Scheme – [MCS Certified | Giving you confidence in home-grown energy](#)

3. Responsibilities/Duty holder

Role	Responsibilities	Frequency
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Board	<ul style="list-style-type: none"> • They are the responsible legal entity and must oversee the discharge of the required standards. • They act as Duty Holders and are accountable for ensuring the implementation of this Policy and the associated Management Plans • They will receive assurance through regular performance reports that the Policy and Management Plan are being implemented and that the regulations are being fully complied with. • In doing so they will ensure the safety of colleagues, customers, contractors, and the wider public has not been compromised. • They will also ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested third parties, informed of the regulatory landlord compliance position. • The Board will be responsible for ensuring that any necessary remedial action, arising from performance reports, are undertaken to comply with the Policy and ensure that a regulatory landlord compliant position is maintained. 	6 Monthly/ Annually
Audit and Risk Committee	<ul style="list-style-type: none"> • Seek assurance that the regulations are being adhered to providing challenge on the adequacy of controls • They will receive Internal Audit reports, and monitor the delivery of actions arising, through to successful completion. • They will draw any concerns they may have arising from such reports to the attention of the Board • Provide critical friend support and advice 	Quarterly
Chief Executive Officer	<ul style="list-style-type: none"> • Retains the overall responsibility for the monitoring of the consistent implementation of this Policy and associated Management Plans to effectively comply with the regulatory standards. • If the regulatory standards are not maintained to report any breach in standards to the Board and Regulator of Social Housing. 	Ongoing
Disclosure Committee	<ul style="list-style-type: none"> • Provides oversight on the adequacy of assurance over regulatory requirements • Reviews external reporting prior to submission / publication • Delegates operational oversight to appropriate persons or groups as required to fulfil the above remit 	Regularly
Chief officers	<ul style="list-style-type: none"> • Appoint/nominate sufficient resources to fulfil the Responsible Person roles for all Non-gas heating Safety requirements and use this Policy to define their duties. • Delegate appropriate authority for in-house delivery or procurement to meet the requirements. • Ensure that the conditions of all contracts are being fulfilled either by Internal Service Provider/s or external Contractors. • Will oversee the programme of Policy and Strategic Review 	Ongoing

	<ul style="list-style-type: none"> Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance. 	
Senior leaders	<ul style="list-style-type: none"> Agree and set budgets that are sufficient to meet the compliance requirements Will ensure the operational delivery of this Policy and Management Plans and compliance with the regulations Will manage the strategic implementation of this Policy and ensure compliance with all Regulations. Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors (Internal and/or external) to address any delivery shortfalls. Monitor the quality and correct storage of all certification and documents required to demonstrate Landlord Compliance. Will provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. Will implement Data Governance Protocols Will receive audit feedback and act upon the findings. 	Ongoing
Delivery Teams	<ul style="list-style-type: none"> Will formulate Programmes of Work consistent with the delivery of this Policy. Will instruct/liaise with internal operational managers and external Contractors in respect to the operational delivery of this Policy and Management Plan. Will liaise with Neighbourhood Management Team /Housing Team and customers to explain the importance of compliance and the need to achieve access to complete safety checks and works Managing customer feedback (enquiries, complaints and compliments) handling and progress. Liaise with IT and ensure system(s) and interfaces operate effectively Will manage the availability of accurate Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts. Will oversee the preparation of the KPI/MPI and OPI reporting suite 	Ongoing
Colleagues	<ul style="list-style-type: none"> Carrying out their work in line with this policy and associated procedures and processes Applying Bromford Flagships DNA in everything they do Reporting non-compliance to line management as soon as practically possible Consider Non-gas heating safety in all our activities and notifying compliance leads of any activity which puts compliance at risk. 	Ongoing
Customers	<ul style="list-style-type: none"> Agreeing to and keeping appointments to provide access. Liaising with Bromford Flagship colleagues in relation to any poor service, failure to attend/poor repair etc. 	As required

	<ul style="list-style-type: none"> • Report any Non-gas heating failure, faults or defects impacting the safe operation of heating systems in their home. • Provide customer satisfaction information. 	
Contractors/Suppliers	<ul style="list-style-type: none"> • Operational delivery of non-gas space & water heating Safety Inspections and cyclical maintenance to Non-Domestic and Domestic Stock. • Review Property addresses and reconcile with databases to ensure the programme remains accurate. • Liaise with customers in relation to arranging / keeping appointments. • Liaise with the delivery teams in relation to access issues. • Update system(s) with accurate data in line with Data Protocols. • Provide appropriate, complete and correct certification for all Non-gas heating Safety works. • Provide Quality Assurance (QA) checks in accordance with the contract. 	Ongoing
Independent External Auditor	<ul style="list-style-type: none"> • Undertake 5% External Validation of Non-gas space & water heating Safety Inspections in line with the Management Plan. 	Ongoing
Internal Audit and assurance	<ul style="list-style-type: none"> • Conduct reviews according to audit and assurance plans as agreed with ARC 	Ongoing

4.0 Principles

Bromford Flagship will comply with statutory, legislative and regulatory standards and are committed to providing a robust, safe, efficient and cost-effective service to our customers in relation to the management of Gas safety. In respect of our responsibilities for non-gas space and water heating safety Bromford Flagship will:

- Provide clear lines of responsibility for the management of all non-gas heating appliances which includes oil, solid fuel, air and ground source heat pumps (ASHP & GSHP), electric boilers, electric heating appliances, unvented cylinders, pipework, flues, and ventilation systems.
- Retain an averse risk appetite in matters relating to non-gas space and water heating safety.
- Ensure robust Non-gas safety procedures are in place and adhered to by all colleagues. This will be achieved by providing relevant training for all colleagues involved with Gas safety.
- Completing a non-gas safety check and service on all relevant appliances in Bromford Flagship maintained properties, within 12 months of installation/handover or at intervals of not more than 12 months since the last safety check.
- Completing an annual safety check on all oil, solid fuel, air and ground source heat pump (ASHP, GSHP) appliances, pipework, flues, and ventilation in Bromford Flagship maintained properties.
- Record the safety check results on an appropriate document and store securely in an electronic document record management system.
- Carrying out a safety check and service on all relevant appliances at every change of occupancy e.g., voids, mutual exchanges, transfers, decants
- Carrying out a safety check and service on all relevant appliances at intervals of not more than 12 months in standing stock properties and longer-term empty homes.

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- Undertaking a 5% audit, utilising either internal technical auditors or independent third-party consultants on all service and safety checks relating to non-gas appliances and their installations.
 - Undertaking related repairs in line with performance targets.
 - Promptly dealing with unsafe situations by making them safe and carrying out repairs with agreed timescales.
 - Maintain a process for dealing with unsafe situations in accordance with internal unsafe situations process which mirrors or is similar to the requirements of the Gas Industry Unsafe Situations Procedure (IGEM/G/11).
 - Installing and maintaining CO detectors in all our properties in any room containing any fixed combustion appliance, except gas cookers.
 - All properties will have the Smoke and CO Alarms inspected & tested annually.
 - Inspecting relevant domestic properties every 12 months & commercial every 6 months, which are known to contain decommissioned appliances and systems to ensure that appliances or supplies have not been connected without Bromford Flagship knowledge.
 - Having a robust process for gaining access, by appointment, to conduct fuel safety checks, servicing and other works.
 - Taking appropriate legal action where customers refuse or fail to facilitate access to their home to undertake the service/safety check.
 - Capping off oil supplies where appropriate, following a risk assessment, if access cannot be gained to carry out a safety check to mitigate risk to customers, property, or the wider neighbourhood, monitoring these properties regularly and retaining these properties on the annual servicing programme.
 - Monitoring customer requests to undertake work affecting any space or water heating appliance, installation, system, pipework, controls or flue maintained by Bromford Flagship.
 - Ensuring all new build properties in Bromford Flagship management are included in the appropriate servicing programme for future inspection and maintenance in accordance with this Policy.
 - Ensure every contractor or consultant employed by Bromford Flagship to carry out works in our homes and buildings has the relevant licenses, registrations, accreditations, competencies and qualifications, as specified by the relevant regulations and Bromford Flagships procedures.
 - Ensure colleagues receive appropriate training to fulfil their duties in relation to managing space and water heating system and appliance safety.
 - Fulfil our commitment to equality and diversity while delivering non-gas space & water heating services to our customers.
 - Only using a competent and appropriately qualified contractors and engineers to ensure that we fully comply with our legislative and statutory duties.
 - Having a robust process for gaining access, by appointment, to conduct fuel safety checks, servicing and other works.
 - Refusing requests by customers to install solid fuel appliances or opening up & re-commissioning of solid fuel appliance and fireplaces.
 - Removing open flued appliances at void stage or at every other appropriate opportunity in consultation with the customer (e.g., solid fuel appliances and gas fires). In exceptional circumstances i.e. Cost of living etc. Careful consideration would be given as to whether an economical repair is feasible. However, if the appliance or chimney is beyond economical repair or presents a risk to the structural integrity or safety of the building the option to decommission, seal & remove chimney will be the preferred option.

4.1 Additional Safety Measures

- Require that customer alterations should be subject to prior notification, agreement, and appropriate landlord's permission (Refer to Customers Alteration Policy) from Bromford Flagship to proceed before they are undertaken – as is required by the Tenancy Agreement. Permission will not be unreasonably withheld. Any unauthorised alterations will be required to be removed by Bromford Flagship's appointed contractor at the customer's own expense.

4.2 Data

- Maintain an up-to-date Master Database of all properties where we have a responsibility to provide Safety Checks and maintenance on non-gas space and water heating systems, pipework, controls and appliances.
- For each relevant property record and maintain up to date data confirming which of the systems and appliances within the scope of this Policy exist and do not exist and the organisation's associated responsibility.
- Where a requirement exists hold data and certification relating to the last two Safety Checks and record the next due date.
- Where a requirement does not exist hold appropriate evidence.
- Maintain current and up to date records of remedial works for the entire portfolio which will detail all recommendations from non-gas space & water heating safety checks.

4.3 Access

- Have a robust process in place to gain access to homes and property for undertaking essential safety inspection and works on non-gas space and water heating systems, pipework, controls and appliances in accordance with Bromford Flagships access procedures.
- Take appropriate legal action where customer refuse or fail to facilitate access to their home to undertake safety checks and maintenance of non-gas systems, pipework and appliances.

5. Linked documentations (including policies, procedures, standards, processes, reconciliation frameworks)

Bromford Flagship Documents	Bromford only	Flagship only
Customers Alterations Policy Bromford Flagship Health and Safety Policy	<ul style="list-style-type: none">• Gas Safety Procedure.• Electrical Safety Procedure• Non Gas Heating procedure.• Gas Safety Pre-work Risk Assessment – Non Gas worker.• Gas Fuel Safety Quality Audit Process Guidance.• Appointment letters 1-3• Legal (7 day) letter• Access process map• Capping letter• Working around flues process maps• Mutual Exchange policy	<ul style="list-style-type: none">• Flagship Gas Safety Policy & Procedure• The Gas and Carbon Monoxide Safety Management Plan.• Gas Safety Operational Guidance Notes.• The Landlord Compliance Policy.

	<ul style="list-style-type: none"> • Empty homes policy • Safety Alert 26 – Gas Cooker Safety. • Safety Alert 21 – Gas Safety Process. • Reconciliation framework. 	
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External References

External references
The Institution of Gas Engineers and Managers: IGEM The Institution of Gas Engineers and Managers (IGEM)
Gas Safe Register: Gas Safe Register - The Official List of Gas Safe Registered Businesses - Gas Safe Register

6. Competence and Training

We will commit to demonstrating a sufficient level of skill, knowledge and aptitude that shows we can provide good quality advice and services to our customers. Competence will be detailed through our process and procedure documentation and remain under continuous review to ensure we provide our services safely and by suitably trained colleagues.

7. Agreed KPIs

The following KPIs are reported to the Executive Team on at least a monthly basis:

- Number of current expired oil, solid fuel, ASHP & GSHPs
- Number of oil, solid fuel, ASHP & GSHPs due to expire in the next 30 days
- Number of oil, solid fuel, ASHP & GSHPs due to expire in the next 60 days

The Board are provided with the following KPIs on a monthly basis:

- Number of current expired oil, solid fuel, ASHP & GSHPs

Risk and Compliance Forum are provided with the following KPIs on a monthly basis:

- Number of oil, solid fuel, ASHP & GSHP services expired within the previous calendar month
- Number of oil, solid fuel, ASHP & GSHP services expired in current month
- Cumulative number of expired Oil, Solid Fuel, ASHP & GSHP services over the last rolling 12 months
- Number of oil, solid fuel, ASHP & GSHP services due to expire in the next 60, 30 and 7 days.

Operational KPIs and MIs are monitored daily by the Compliance Team and Service Delivery Team using real time dashboards. Exceptions are highlighted to management immediately.

8. Assurance Framework

Our risk appetite is averse for health and safety risks. We have zero tolerance for actions or omissions that could compromise the health and safety of individuals affected by our operations. We are committed to upholding the highest standards of health and safety

compliance, proactively identifying and mitigating risks, and fostering a culture of safety throughout the organisation.

Our assurance framework should be read in conjunction with this document to understand how we undertake assurance in line with our risk appetite.

9.0 Document Details

Owner: Paul Coates- Chief Customer Officer
Approved By: Bromford Flagship Board
Date of Approval: 28th February 2025
Next Review Due: 28th February 2026
Policy Version: 1.0
Share to website: Yes/No

Version Control

Note: Minor updates approved by delegated authority increase version number by 0.1. Major updates and formally approved versions increase version number by 1.0. Version Detail Approved by Date 1.0 [first issue following Bromford Flagship merger with introduction of new version control on xx/xx/xxxx]

Renewal Date	Version	Approved By	Comments