

Heat Networks Regulation
Consumer protection guidance consultation
Joint Response from the National Housing Federation,
the Chartered Institute of Housing and The Heat Network
October 2025

The National Housing Federation (NHF), Chartered Institute of Housing (CIH) and The Heat Network (THN) have been working together for the last nine months to bring together a unified voice for the social housing sector in heat network regulation development. As part of this, we co-founded the Social Housing Heat Network Regulation Task Group, a forum for solution-driven policy discussions which both Ofgem and DESNZ are invited to attend. This response to the 'Consumer protection guidance' consultation is a joint response from all three organisations.

[The National Housing Federation](#) is the voice of England's housing associations, which are not-for-profit social landlords providing affordable housing for people on low incomes. The English Housing Survey shows at least 150,000 housing association homes are supplied with heat and hot water through primarily communal heat networks. Housing associations also provide 75% of the country's rented supported and retirement homes, many of which operate communal heating systems.

[The Chartered Institute of Housing](#) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals and their organisations with the advice, support, and knowledge they need. CIH is a registered charity and not-for-profit organisation. We have a diverse membership of people who work in both the public and private sectors, in twenty countries on five continents across the world.

[The Heat Network](#) is a peer group of social housing providers who meet to discuss and share good practice about district and communal heating. We bring together our own communal heat experiences and share the lessons we've learnt with colleagues across the sector. We have 41 housing association and local authority members who directly manage around over 125,000 homes on over 3,000 networks – around 25% of the UK total – and are responsible for many others on third party heat networks (eg ESCOs and s106 schemes). As well as NHG and CIH, we are also supported by the Local Government Association, the National Housing Maintenance Forum and Community Housing Cymru.

To discuss our consultation response further please contact:

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Our Response

We welcome Ofgem's recognition, both through the consultation document and the draft guidance, of the broader regulatory framework in which registered social housing providers (housing associations and local authorities) operate. While there is still much to be done to fully understand the interplay between heat network and housing legislation, we appreciate Ofgem's ongoing engagement with the sector and look forward to continuing our dialogue with you over the coming months.

We also welcome Ofgem's approach of consulting on draft guidance which will become the rulebook for heat network suppliers. The style is straightforward and easy to follow and understand, with appropriate examples of the regulatory intention. We know that the guidance will continue to evolve as we travel through the transition period and use the guidance in real life. More questions will emerge, scenarios will arise and case history will develop, but this is a really good starting point.

Our response to the specific questions are short but we hope still helps to build your evidence base.

Standards of Conduct

1. Do you find our proposed guidance on the Standards of Conduct relevant to the corresponding authorisation condition, and useful?

Yes

2. What should we consider including in a future iteration of the guidance on the Standards of Conduct, to make it more useful?

Para 1.2: "an authorised person is considered an operator if they control the transfer on that network of thermal energy for the purposes of supplying heating, cooling or hot water". This may need further detail to explain duties where the 'control' is shared across the network, for example where there is bulk supply to a building.

3. Can you share some examples of how you have approached consumer engagement practices, where this has improved your understanding of consumer needs?

Housing associations and local authorities are committed to engaging with their residents. As community organisations with a social purpose to provide affordable housing, they are able to work with a diverse set of residents, including those from underserved groups, and ensure that their views and needs are accounted for in the delivery of safe homes and services. Resident engagement takes many forms, including tenant-led scrutiny panels, the integration of residents into governance structures, as well as day-to-day interactions, such as those between residents and housing staff. Social housing providers recognise that engagement also includes reaching out to residents in a wide range of ways and making the most effective use of data held on both the property and residents.

The Regulator of Social Housing introduced new consumer standards in April 2024. Under these standards, especially the [Transparency, Influence, and Accountability](#)

[Standard](#), social landlords must take the views of their residents into account in their decision-making about how their services are delivered.

In line with regulatory requirements and in order to provide the most effective and efficient service to residents, many social landlords are looking across the board at [Making Every Contact Count](#) and better use of data. The case studies in this report are not specific to heat networks but demonstrate a range of approaches across all types of home that can be taken to make every contact count. These cover areas such as which routine interactions with residents can be used as opportunities to gather additional data, residents' views on how their data is collected, how the data is stored, managed and used, and lessons learned and plans for the future.

TPAS's [tenant engagement standards](#) represent good practice in resident and consumer engagement, and TPAS's principles and framework are used by many social landlords. The establishment of high-level principles, with accompanying guidance for engaging residents in heat networks' decision making, would be welcome, and would allow social landlords to adapt existing methods of engagement as they see fit.

Quality of Service: Complaints

4. Do you find our proposed guidance on complaints relevant to the corresponding authorisation condition, and useful?

Yes

5. What should we consider including in a future iteration of the guidance on complaints, to make it more useful?

Para 2.11: "It is our intention that variations between our definition of a complaint and another relevant authority within the sector should not result in an authorised person having to accept housing and/or heating complaints under different thresholds, nor should it result in a duplication of complaint handling procedures."

We're pleased to see the housing complaint process recognised and that the intent is for duplication to be avoided. This begins to be explored in Paras 2.40-2.42, but more clarity on how this will work in practice is still required. We suggest further joint work between registered providers, residents, Housing Ombudsman Service and the Energy Ombudsman to develop an efficient process that works for residents.

Quality of Service: Assistance and Advice Information

6. Do you find our proposed guidance on assistance and advice information relevant to the corresponding authorisation condition, and useful?

Yes

7. What should we consider including in a future iteration of the guidance on assistance and advice information, to make it more useful?

N/A

Billing and Transparency

8. Do you find our proposed guidance on billing and transparency relevant to the corresponding authorisation condition, and useful?

Yes

9. What should we consider including in a future iteration of the guidance on billing and transparency, to make it more useful?

Para 3.7: we welcome the pragmatic approach where information on fuel type, net zero and monopoly supply only need be provided 'where reasonably practicable'.

Para 3.20: to mirror bills for metered networks, unmetered network bills are also expected to include the charges, information about consumption and comparisons to the previous year. In unmetered networks, proxies are used for consumption such as number of bedrooms or m² of the property. This means that meaningful comparisons to previous years' consumption are difficult. Guidance should clarify that an explanation on how the proxy for consumption is calculated is sufficient.

Para 3.23 – unbundling: We welcome recognition in the guidance that the process of unbundling heat network charges would be very complicated and we welcome the opportunity for further discussion about this.

10. Can you share some examples of best practice for billing, including any examples of templates or bills currently sent to consumers?

For metered networks, our members mostly use third-party metering and billing agents who we're sure would be happy to share examples with Ofgem directly (although we can assist if this is not the case).

11. Do you have any views on non-domestic billing guidance?

No

Back Billing

12. Do you find our proposed guidance on back-billing relevant to the corresponding authorisation condition, and useful?

Yes

13. What should we consider including in a future iteration of the guidance on back-billing, to make it more useful?

Para 4.6: we're not sure why it's necessary to particularly refer to the Heat Trust standards in the guidance as all heat networks will fall under the new regulations.

With regard to the sections Networks covered by the Landlord and Tenant Act (paras 4.7-4.11) and Back-billing and housing interactions (paras 4.12-4.17): we know this is tied into Ofgem's ambition to unbundle heat charges from service charges and we look forward to working with you on this going forward. We do however welcome the interim approach Ofgem is taking whereby "From the start of

regulation, until further notice, Section 20B of the Landlord and Tenant Act 1985 will take precedence. This means that consumers living in properties covered by this legislation will be subject to the 18 months back-billing limit.” (para 4.8)

Para 4.16: “Given the existing legislation in the Landlord and Tenant Act 1985 the housing regulatory framework will take precedence over the heat network regulatory framework in these scenarios. This means that, while consumers are able to contact Citizen’s Advice, Consumer Scotland and the Energy Ombudsman for complaints and questions, they should also contact the Housing Regulator, Regulator of Social Housing, LEASE (Leasehold Advisory Service), and the First Tier Tribunal.” It is not clear what the intention is, in providing this information as part of guidance. It describes the current situation but without context, it is quite confusing for both consumers and providers. For a tenant or leaseholder of a Registered Provider the first route for redress should be the internal complaints procedure.

Heat Supply Contracts

14. Do you find our proposed guidance on heat supply contracts relevant to the corresponding authorisation condition, and useful?

Yes

15. What should we consider including in a future iteration of the guidance on heat supply contracts, to make it more useful?

Para 5.6: “If a consumer has an equivalent supply contract, including a Deemed Contract or Relevant Lease, we would expect the relevant supplier to take reasonable steps to provide information missing from the equivalent contract to the consumer upon request. Where a Relevant Lease is used, we would not expect parties to vary the lease or contract to include the missing information if it is not reasonable to do so.” We welcome this pragmatic approach.

Para 5.9 – ‘What is included in a heat supply contract’: key performance indicators of the heat network, including network efficiency. Meaningful efficiency KPIs are very difficult to provide if the scheme is unmetered. In line with OFGEM’s ambition for a regulatory framework focussed on outcomes for residents, there should be greater flexibility on providing information for providers of unmetered networks

16. Can you provide any examples of best practice for heat supply contracts/agreements?

The Heat Network has asked its members to provide these so we can pass them on to Ofgem.

17. Do you agree with our use of “deemed contract”?

Yes

18. Can you provide any examples of best practice for termination of contract, including scenarios where a consumer terminates the contract or disconnects but continues to live in the property?

No

19. What are your views on transitional arrangements and timelines for implementing heat supply contracts? (paras 5.18-5.21)

We strongly welcome Ofgem's pragmatic approach to the introduction of HSCs overtime, for example (para 5.19)

- when a new resident enters the property,
- when meter requirements come into effect, or
- when an existing contract term ends and a new one is needed

We also welcome the recognition that varying leases can be costly and/or lengthy (including situations where residents refuse to accept proposed changes), and that in these cases alternative routes to delivering the HSC outcome can be considered (para 5.21)

Protections for Consumers in Vulnerable Situations

20. Do you have any views on interactions between the protections for heat network consumers in vulnerable situations and existing regulations in housing, such as the social housing, leasehold and freehold, and private rental sectors

Registered providers are required to meet consumer based standards as set out by the Regulator of Social Housing. These mean landlords need to:

- ensure tenants are safe in their homes
- listen to tenants' complaints and respond promptly to put things right
- be accountable to tenants and treat them with fairness and respect
- know more about the condition of every home and the needs of the people who live in them
- collect and use data effectively across a range of areas, including repairs

To meet these requirements social landlords have to understand the range of vulnerabilities, needs and preferences across their residents. Compliance with all requirements is tested during routine organisational inspection by the RSH. For housing associations there is a very clear line of accountability to the board and local authorities are accountable as public bodies. The HOS also has powers to determine and address severe maladministration and public findings naming relevant landlords.

To achieve the most effective outcomes for consumers, protections for heat network customers should be integrated into existing processes where possible and any requirements to evidence this to Ofgem should recognise the value of this integrated approach.

The 2024 Leasehold Reform Act and recent consultation from MHCLG on [leasehold and service charge reform](#) will extend the rights of both leaseholders and tenants who pay

service charges. These include the right to routinely receive standardised information and the right to request information. Government also proposes to reform the regulation of major works for leaseholders including introducing a new requirement to produce and share information on Asset Management Plans to give leaseholders a clearer sense of when major works may take place and the extent of the work and level of cost. Legislation already requires consultation with leaseholders on major works over of over £250 per leaseholder.

21. Do you find our proposed guidance on [priority services registers](#) relevant to the corresponding authorisation condition, and useful?

Yes

22. Do you find our proposed guidance on [security deposits, payment difficulties, disconnections and direct debits](#) relevant to the corresponding authorisation condition, and useful?

Yes

23. Do you find our proposed guidance on [prepayment meters](#) relevant to the corresponding authorisation condition, and useful?

Yes. We're particularly pleased to see clearer language being used to acknowledge the general use of PPM as opposed to when they are used for debt collection (and the associated involuntary installation).

The guidance is clear that heat network suppliers to not have right of entry for debt collection and therefore the 'involuntary installation' of PPM is limited to remotely switching a meter from credit to PPM mode. The processes and safeguards outlined in the guidance for this to happen are clear, including the pragmatic approach where attempts to engage and/or visit the customer are unsuccessful.

There should be flexibility within any requirement for staff to wear and use a body camera on a welfare visit. For some residents this may be alarming and may result in refusal to grant entry and disengagement from any offer of help and support.

24. Do you find our proposed guidance on [self-disconnection](#) relevant to the corresponding authorisation condition, and useful?

Yes

25. What should we consider including in a future iteration of the guidance on protections for consumers in vulnerable situations, to make it more useful?

N/A

26. Do you find our proposed guidance on the security of supply relevant to the corresponding authorisation condition, and useful?

Yes

27. What should we consider including in a future iteration of the guidance on the security of supply, to make it more useful?

N/A