



ECO FLEXIBLE ELIGIBILITY

STATEMENT OF INTENT

North Devon Council

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Version 1

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1. INTRODUCTION

The North Devon Council (NDC) welcomes the introduction of the flexible eligibility part of ECO, and will utilise it to help residents in fuel poverty or at risk from cold related ill health within its district. This Statement of Intent sets out how households will be assessed and declared eligible for ECO in accordance with guidelines provided by the Department of Business, Energy and Industrial Strategy (BEIS). This scheme is part of the Government's Affordable Warmth Programme and takes into account the Annual Fuel Poverty Statistics' Report for England, published by BEIS¹. In providing this statement, we will contribute to the Council's priorities to provide "a stronger future for North Devon" and in "making the district prosperous and the place of choice for all".

Fuel poverty rates are significant across Devon, with many households experiencing high cost and poor quality housing. In 2015, 5,500 households were recognised as being in fuel poverty within the NDC area: this represents 13.1% of the working age population, significantly it is more than 2% higher than the average for England (which is 11%). This is identified and recognised in the Devon Joint Health and Wellbeing Strategy 2016 – 2019, and addressing this issue is one of the goals for the Devon Health and Wellbeing Board².

The Joint Strategic Needs' Assessment local profile for North Devon, shows a fuel poverty rate higher than the national and regional average³.

NDC is working to tackle poor housing and fuel poverty in the district through a combination of intervention, support and signposting.

Where possible, the Council will continue to collaborate with other Devon authorities to develop effective partnership working and consistency across the county.

¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/639118/Fuel_Poverty_Statistics_Report_2017_revised_August.pdf

²<https://www.devonhealthandwellbeing.org.uk/strategies/>

³<http://www.devonhealthandwellbeing.org.uk/jsna/profiles/district/>

Meeting the flexible eligibility criteria does not guarantee the installation of measures. The final decision is made by the energy suppliers or their agents/contractors and will depend on:

- 1) The survey carried out by suppliers' agents/contractors and installation costs calculated.
- 2) The energy savings that can be achieved for a property.
- 3) Whether suppliers have achieved their targets or require further measures to meet their ECO targets.

2. HOW THE LA INTENDS TO IDENTIFY ELIGIBLE HOUSEHOLDS

ECO Flexibility assistance is only available to private tenure households.

In order to be eligible for this funding, a household must fit one or more of the following criteria:

- a) Living in fuel poverty, but not in receipt of benefits ("fuel poverty").
- b) Low income and vulnerability to cold ("LIVC").
- c) Solid Wall Insulation (SWI) "in-fill".

The North Devon District Council will keep these criteria under review in relation to levels of referrals made, delivery of installed measures and the developing practices of other authorities. This Council seeks to maximise take up of the scheme for residents who fall within the criteria of need, within the statutory parameters of the arrangements.

2(a) Criteria for identifying households in fuel poverty (FP)

Fuel poverty is defined as living with low income but high heating costs. Two elements will be assessed to determine eligibility.

- i) For the 'low income' portion of this indicator, evidence will be sought that a member of the household is in receipt of an income related benefit in the first instance (Housing Benefit, Council Tax reduction/support [other than single person discount], Child Tax Credit, Working Tax Credit or Universal Credit).
- ii) If no one in the household meets this criteria, then a household will be identified as being on 'low income' if the annual household income (after housing and energy bills have been deducted) is less than £30,000.
- iii) For the 'high cost' portion of this indicator, eligible households will be identified as those that have an Energy Performance Certificate (EPC) rating of 'D' or lower; or

- iv) Have a score of 10 points or greater in Table 1 below.

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Table 1: Property Condition

Property Details	Type	Points	Tick Box	Score
Number of bedrooms:	1	1		
	2	2		
	3+	3		
Number of people living in the property:	1	1		
	2	2		
	3+	3		
How much loft insulation is present?	None	5		
	Up to 150mm	3		
	250mm and above	1		
What is the wall type?	System built	5		
	Solid stone/brick	3		
	Cavity construction	1		
How much wall insulation is present?	External	1		
	Internal	1		
	Cavity	2		
	None	5		
What heating fuel is used within the property?	Mains gas	1		
	Oil	2		
	LPG	3		
	Electric	5		
	Solid fuel	5		
Is there a central heating system within the property and what age is this?	Less than 10 years old	1		
	Over ten years old	3		
	Broken system	5		
	No system	5		
			Total	

- v) In the event that a property does not meet this criteria, the following property types will be deemed as meeting the definition due to their high energy bills, hard to treat and hard to reach nature:

Qualifying Criteria:

- a) Park Homes and other permanent caravan residences (regardless of income).
- b) Privately rented properties, including Houses in Multiple Occupation (HMOs) (regardless of income).
- c) Properties heated by a fuel other than mains gas.
- d) Flats above commercial premises.
- e) System built properties.
- f) Sheltered housing for the elderly.
- g) Homes which require cavity wall insulation.
- h) Homes which require solid wall insulation.
- i) Homes with 100mm or less of loft insulation.
- j) Homes with a boiler which meets the ECO Qualifying Boiler criteria.

2(b) Criteria for identifying low income and vulnerability to cold (LIVC)

Three elements will be used to assess eligibility under this criteria:

- 1) 'Low income' portion of this identifier, as set out under the previous section for 'fuel poverty'.
- 2) 'High heating cost', as set out under the previous section for 'fuel poverty'.
- 3) Vulnerability to cold will be assessed on the basis of information provided by the resident(s) identifying any health condition suffered by any member of the household, which have been diagnosed by a healthcare professional. This information will be cross-referenced against NICE guidelines and quality statement for the health risks associated with cold homes⁴. These are:
 - a) People with cardiovascular conditions.
 - b) People with respiratory conditions (in particular, chronic obstructive pulmonary disease (COPD) and childhood asthma).
 - c) People with mental health conditions (moderate to severe).
 - d) People with disabilities.
 - e) Older people (65 and older).
 - f) Households with young children (up to 10 years old).
 - g) Pregnant women.
 - h) People with addictions.
 - i) People with terminal illness.
 - j) People living with dementia.
 - k) People with autoimmune or immunodeficiency diseases (e.g. diabetes, MS, lupus).
 - l) People with suppressed immune systems (e.g. cancer treatment or HIV).

⁴<https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations>

- m) People who move in and out of homelessness.
- n) People in receipt of disability benefits, including PIP and DLA.
- o) Recent immigrants, asylum seekers and refugees (living in private tenure).
- p) Anyone else with a health condition made worse by the cold (assessed against relevant guidance).

Any referral or enquiry received that does not meet the above requirements, will be considered on a case-by-case basis; the decision made, and reasoning will be documented.

2(c) Criteria for Solid Wall Insulation (SWI) “in-fill” projects

To facilitate SWI projects in a locality, solid wall homes (i.e. no cavity wall) which are not ‘fuel poor’ will be eligible for Flexible ECO funding where they are co-located with a minimum percentage of households assessed to be fuel poor or LIVC.

The criteria for this will be:

- Semi-detached houses/bungalows and buildings with 2 premises – at least 50% of properties in an SWI project must be FP or LIVC.
- Same terrace – at least 66% of properties in an SWI project must be FP or LIVC.
- Same building – at least 66% of properties in an SWI project may be FP or LIVC.
- Adjacent properties – at least 66% of properties in an SWI project must be FP or LIVC.

3. ACTING ON BEHALF OF ANOTHER LOCAL AUTHORITY

This declaration is made solely for North Devon Council (NDC). NDC is not acting on behalf of any other local authority.

4. JOINT STATEMENT OF INTENT

This declaration is made solely for the District Council. NDC is not currently part of any joint SOI or common criteria arrangement. This will be kept under review.

5. GOVERNANCE

The Private Sector Housing (PSH) team at North Devon District Council will liaise with residents and ECO providers to produce the required declaration forms. The Head of Service for Environmental Health and Housing (or any qualified person he elects to delegate to), will be responsible for signing local authority declarations on behalf of NDC.

6. REFERRALS

NDC expects referrals for Flexible Eligibility may come from:

- 1) Self-referrals from residents.
- 2) Other Council departments.
- 3) Social care or health organisations.
- 4) ECO providers, installers or agents.
- 5) Use of Home Analytics' database.
- 6) Analysing EPC data.
- 7) Contact will be made with those who applied through previous energy schemes but were unsuccessful due to ineligibility, e.g. the Central Heating Fund.
- 8) Citizens Advice.
- 9) North Devon Homes.
- 10) Other RSLs.
- 11) 361 Energy.
- 12) Social prescribing organisations (who determine those that may be vulnerable or those with health conditions).
- 13) We will also target people who are in receipt of disability/carers' benefits who have been means' tested in the past.
- 14) Eligible households will also be identified through routine inspections, which officers in the PSH team undertake.
- 15) Private tenants and private homeowners will be identified and referred to the scheme.
- 16) Low income households living in energy inefficient housing will be identified in the private rented sector through enforcement activity under the Housing Act 2004 and landlord associations/forums.

NDC will ensure that referral processes used, comply with data protection.

7. EVIDENCE, MONITORING AND REPORTING

The data collected from residents will be suitable and sufficient to confirm their eligibility. This will include:

- 1) Name, address and contact details.
- 2) Benefit details.
- 3) Property type.
- 4) Heating type, fuel and other relevant issues.

Records will be kept of all households targeted, referred and in receipt of any measure. All information will be kept in such a way to maintain the protection of personal data.

Current guidance encourages ECO suppliers to keep the relevant Local Authority informed of all measures installed on the basis of LA declarations made. Where ECO providers are operating within the district, the content and frequency of reporting will be agreed with that supplier. This will allow NDC to report to BEIS and include relevant information in any future Home Energy Conservative reports.

Suitable checks and enquiries will be made to prevent and detect fraud, including official letters on health conditions and DWP support.

Signature:  _____

Jeremy W Mann; Head of Service for Environmental Health & Housing

