ECO: Flexible Eligibility Statement of Intent

Version 3 Published: 2 April 2019 – 30 June 2022 Broadland District Council Statement of Intent South Norfolk Council Statement of Intent

1. Introduction

- 1.1. Broadland District Council (BDC) and South Norfolk Council (SNC) will utilise the Flexible Eligibility stream of the Government's Energy Company Obligation (ECO) to assist vulnerable households living in fuel poverty. This will contribute to a number of the Council's key ambitions
 - To plan and provide for well housed communities
 - To increase levels of health and wellbeing
 - To achieve environmental excellence.
- 1.2. Upon identifying a household as eligible under this scheme, a declaration of eligibility will be authorised and issued to an ECO provider. The case will then fall under standard ECO regulation, further detail for which can be found on the Ofgem website¹. Qualifying through Flexible Eligibility does not guarantee the installation of measures, this rests with the obligated energy suppliers or their contractors. The final decision will depend on
 - (i) the survey conducted by the supplier's agents or contractors and subsequent installation costs;
 - (ii) a property's potential energy savings;
 - (iii) whether suppliers have achieved their targets or require further measures in order to meet ECO targets.

2. Identifying Eligible Households

2.1. The Councils have formulated the following eligibility criteria to identify private sector households that may benefit from installation of measures through the Energy Company Obligation. This approach was created with regard to the Department of Business, Energy and Industrial Strategy (BEIS) guidance on targeting².

In the case of enquiries relating to a council grant where the applicant does not receive an ECO Affordable Warmth benefit³ that is non-means tested, this flexible criteria will be used.

2.2. To qualify, the resident must meet one of the Low Income criteria (section A) in addition to criteria from either High Costs (section B) OR Vulnerable to Cold (section C). Possible routes of eligibility are therefore –

¹<u>Ofgem Energy Company Obligation more information</u>

² Department of Business, Energy and Industrial Strategy: guidance on identifying eligible households

³ Energy Company Obligation: list of qualifying benefits

(A) Low Income + (B) High CostsOR(A) Low Income + (C) Vulnerable to Cold

2.3. Criteria for Identifying Fuel Poverty

Section A: Low Income

- (i) In receipt of one of the following income-related benefits:
 - Housing benefit
 - Council tax reduction/support (not single occupancy)
 - Pension savings credit

OR

(ii) Households not in receipt of an income-related benefit but below state pension age or only claiming child benefit should use the relevant income threshold as shown in the table below. This threshold applies to a household's disposable income after any mortgage or rent payments.

Household Composition	Annual Household Income (after housing costs)	Monthly Household Income Equivalent (after housing costs)
1 adult (18+ years)	£9,300	£775
and 1 child	£12,200	£1017
and 2 children	£15,000	£1250
and 3+ children	£20,000	£1667
2 adults (18+ years)	£15,200	£1267
and 1 child	£18,200	£1517
and 2 children	£21,100	£1758
and 3+ children	£25,000	£2083

Table 1: Low income thresholds used to determine households eligibility for support.

OR

- (iii) If a resident is in receipt of state pension, the household will be assessed using the following income criteria:
 - Where the household consists of only 1 resident's income, at least 50% must be from state pension, and the resident must have no more than £10,000 in savings and investments.
 - Where the household consists of 2 resident's incomes, at least 75% must be from state pension, and the residents must have no more than £20,000 in savings and investments.

Section B: High Costs

(i) Resident is living in a property with an Energy Performance Certificate (EPC) rating of E, F or G.

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(ii) If no EPC is available, a score of at least 80 is required on the questionnaire shown in table 2 below.

Question	Response	Score
	1	5
How many bedrooms are there	2	10
in the home?	3	35
	4+	55
What type of property is it?	Park home or other permanent caravan residence	15
	Flat	15
	Flat above commercial premises	20
	Terrace	20
	Semi-detached	30
	Detached	35
Are energy payments made by	Yes	0
direct debit?	No	10
Does the home use a boiler?	Yes	0
Does the nome use a boller?	No	20
What is the main fuel type?	Gas	0
	Oil	15
	Electricity	25
	No central heating	30
	Other	15
Was the home built before	Yes	20
1964?	No	0
Does the property have 100mm	Yes	20
or less of loft insulation?	No	0

Table 2: Questionnaire used to determine whether a household has high energy costs. Based on BEIS guidance.

Section C: Vulnerable to Cold

(i) The resident is in receipt of a health related benefit.

OR

- (ii) The resident is aged 65 and over or has children aged under 5 or is pregnant.
- OR
 - (iii) The resident is on the Energy Companies' Priority Services register.
- OR
- (iv) The resident has a health or vulnerability condition that can be exacerbated by living in a cold home, as referenced within the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess winter deaths and illness⁴.

⁴ List of health or vulnerability conditions

OR

2.4. Scheme Requirements for SWI "In-fill" Projects

- 2.4.1 Currently the Councils are not actively searching for in-fill properties, but will declare properties to be eligible if approached by a resident or ECO provider. This approach has been taken due to the expectation that ECO grants will be insufficient in enabling fuel-poor households to afford solid wall insulation.
- 2.4.2. Where a property doesn't meet the fuel poverty criteria they can be declared "in-fill" if they are
 - in the same terrace as; or
 - in an immediately adjacent building to; or
 - are in the same building as a household that does meet those criteria.
- 2.4.3. There are also minimum percentages of households that must apply, as detailed in table 3 below.

Property Type	Declaration Requirements
Semi-detached or a building containing no more than two domestic properties	At least 1 of the 2 (50%) properties must have been declared as fuel poor and therefore be eligible for ECO
Any premises that are contained in the same building (e.g. flats), immediately adjacent buildings (e.g. neighbouring properties) or in the same terrace	At least 2 of the 3 (66%) properties must have been declared as fuel poor and therefore be eligible for ECO

Table 3: Minimum requirements for different property types. Based on BEIS guidance.

3. Acting on Behalf of another Local Authority

The Flexible Eligibility scheme will be facilitated through the Energy Team service currently shared by Broadland District Council and South Norfolk Council. The team will provide the central administration for the scheme through taking referrals, processing applications and liaising with ECO providers for both local authorities. Each declaration of eligibility will be authorised by the assigned officers within the stated council.

4. Joint Statement of Intent

Broadland District Council, South Norfolk Council, Norwich City Council and Breckland District Council have agreed to the same Flexible Eligibility criteria outlined within this Statement of Intent.

5. Governance

The authorisation of declarations will be the responsibility of the Housing Standards Senior Manager. In their absence authorisation will fall to the Housing and Health Manager.

6. Referrals

- 6.1. The Energy Team expect referrals for flexible eligibility to come in three ways:
 - 1) Self-referrals from residents;
- 2) Referrals from other council teams or partner organisations; Flexible Eligibility Statement of Intent Version 3 2/04/2019 30/06/22

- 3) Referrals from ECO providers or installers.
- 6.2. Declarations will be issued to contractors through a secure data-sharing process. In turn the contractor will be expected to provide information on the outcomes of the referrals.

7. Evidence, Monitoring and Reporting

- 7.1. Before processing a declaration, the Energy Team will verify that a resident meets the outlined qualifying criteria. Applications will be assessed on a case-by-case basis. To evidence eligibility, the following information will be documented:
 - Name, address and contact details.
 - Details of property type, heating type and required measures.
 - Official documents to support sections A, B or C criteria.
- 7.2. To prevent fraud, the required information will be collected through an application form which applicants must sign to declare the data is correct. Official benefit letters will be checked and if necessary will be verified by internal Benefit Teams. External sources will also be sought to verify answers, such as EPC data, gas grid maps and google street view.
- 7.3. To monitor targeting pathways and promotion methods, applicants will be asked where they heard about the scheme.
- 7.4. Records will be kept of all households targeted and referred as part of the scheme, in addition to the measure installed. Progress will be reported as part of the performance reports and service plans.

8. Signature

Signature of Managing Director – Trevor Holden