



**Somerset West  
and Taunton**



## **JOINT ECO Flexible Eligibility Statement of Intent of:**

**Mendip District Council**

**Sedgemoor District Council**

**Somerset West and Taunton Council**

**South Somerset District Council**

**Publication date: XX/XX/2020**

**Version number: 1**

**Published URL's:**

### **1 Background**

- 1.1 Energy Company Obligation (ECO) - is a requirement placed on energy companies over a certain size to help improve domestic energy performance of the homes of those vulnerable to the cold or on low incomes. In the ECO3 phase there is a new additional facility called Flexible Eligibility. This is where the Councils can set criteria to direct assistance towards local private sector homes at risk of fuel poverty, but falling outside of the normal rules of ECO (usually qualifying benefits).

1.2 Following broad guidance from the department for Business Energy and Industrial Strategy (BEIS), the Councils can access Flexible Eligibility funds on the production of this Statement of Intent. This allows the Councils to set qualifying criteria to target local residents at risk of from fuel poverty. Residents meeting these agreed criteria, subject to the appropriate Council issuing a signed Declaration and a favourable survey report (para 2.7 below) may be assumed eligible by Energy Companies for ECO funded energy efficiency improvements.

## 2 Introduction

2.1 Fuel poverty can cause low income households to live in cold homes which have a negative impact on their health and wellbeing. This is particularly the case for vulnerable households with a cold related illness. In 2017, there were 20,305 fuel poor households in Somerset (using the Low Income High Costs (LIHC) definition). The table below shows the split between the four district local authorities in 2017<sup>1</sup>.

LA Name	Estimated number of households	Estimated number of fuel poor households	Proportion of households fuel poor (%)
Mendip	49,996	5,370	10.7%
Sedgemoor	52,808	5,706	10.8%
Somerset West and Taunton	67,934	7,329	10.8%
South Somerset	75,323	7,900	10.5%

2.2 Those most affected by cold homes: households where somebody is older, has a disability and whose health conditions are worsened by cold or damp homes. Somerset has an aging population and higher proportion of people with disabilities. Amongst the 65-74 age group, the annual rate of growth is estimated at 3.4%, five times the average growth rate. One in six of the population identified themselves as having a long-term health problem or disability, which limited their day-to-day activity (2011 Census).

<sup>1</sup> See <https://www.gov.uk/government/collections/fuel-poverty-sub-regional-statistics>

- 2.3 Those within the latter category and living in the most rurally isolated areas of Somerset with less access to services. Many parts of Somerset rank amongst England's lowest population density, meaning that vulnerable households living in these very rural areas (often in homes without access to gas) have even less mainstream support than households living elsewhere. In addition, there are estimated to be 10,310 households in Somerset who are without gas central heating (currently the most efficient form of heating available), living within the 25% most deprived areas in the UK, but who could be connected to the gas network.
- 2.4 ECO flexibility will support the delivery of national fuel poverty targets to improve the EPC ratings of households in fuel poverty. This statement of intent will also help deliver the aims of the Somerset Housing Strategy which facilitates a partnership approach to the delivery of sustainable, warm and healthy homes for all Somerset residents. The framework has been developed by the Somerset Strategic Housing Partnership which includes all four Councils and Somerset County Council that represents the Somerset Clinical Commissioning Group (CCG).
- 2.5 The Councils each have a legal duty to improve the health and wellbeing of residents and to reduce the differences in health outcomes between the populations they serve. Housing is a key factor that affects people's health. Evidence shows that poor housing conditions cause accidental injury, make existing health conditions worse, make treating health conditions difficult and have a huge social impact upon the ability of individuals to achieve their potential in education or employment.
- 2.6 The eligibility criteria have been designed to support fuel poor activity in Somerset with a particular focus on the areas previously identified in the Council's respective HECA reports and those homes identified in 2.3 and 2.4 above.

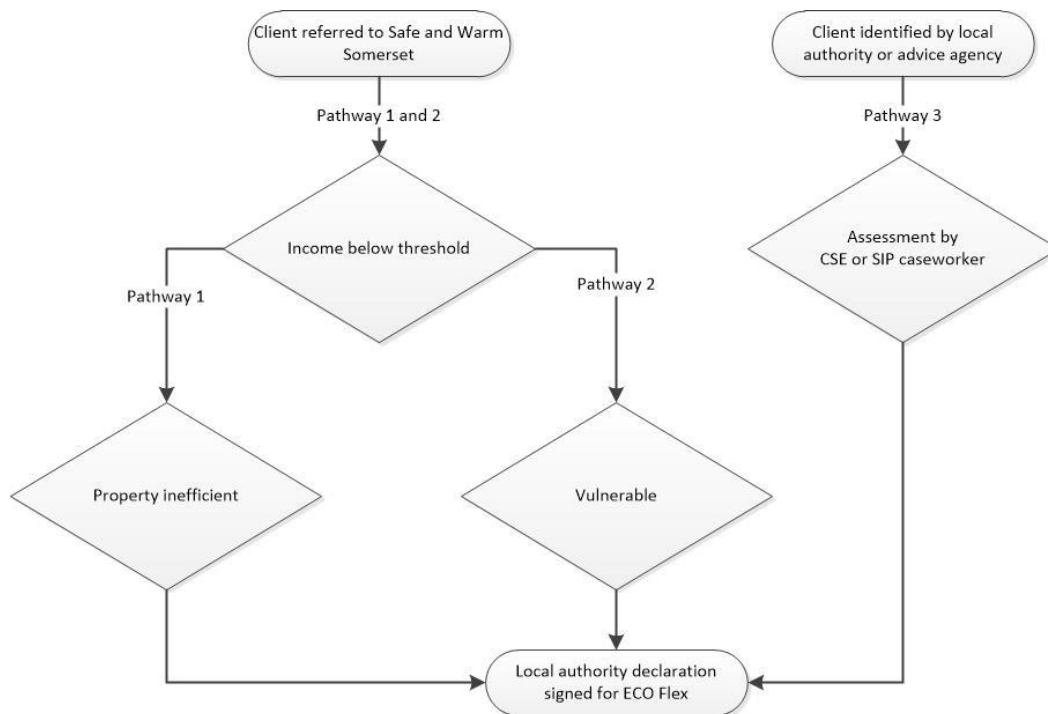
2.7 Referrals made under ECO flexibility will be subject to the same market conditions as wider ECO energy efficiency work; as such a local authority declaration does not guarantee that the measure will be viable. The final decision will depend upon the survey by the obligated suppliers or their agents/contractors.

### 3 How the LA intends to identify eligible households

3.1 ECO Flexible eligibility is available to private sector households, including owner occupiers and private tenants, in line with the Government’s guidance (ECO: Help to Heat Flexible Eligibility p1). All potentially eligible households will need to apply through the Home Energy Team at the Centre for Sustainable Energy in order to be assessed (0800 082 2234 or <https://www.cse.org.uk/advice/contact-us>).

3.2 The Home Energy Team will check eligibility in their initial conversation with the resident; they will also check that the resident is happy for their data to be stored and shared with a third party. The eligibility information will be recorded on a secure customer record management system (CRM). The Councils will issue regular Declarations to its Delivery Partners setting out those households that are eligible. The Delivery Partner will pass this information onto their ECO supplier according to the ECO application process.

3.3 There are three pathways to eligibility.



### 3.4 Pathway 1: Income and Property

The Councils will each identify in the administrative districts they serve eligible households\* in fuel poverty as those that:

i) have a net income of £30,000 or less AND less than £30,000 in savings of any kind;

and

ii) score 35 or above in their responses to the following high cost questions:

Does the home use a boiler?	Yes	0
	No	5
Property is a park home	Yes	35
	No	0
Has unfilled cavity walls?	Yes	35
	No	0
Was the home built before 1964?	Yes	25
	No	0
What is the main fuel type?	Mains gas	0
	Electricity (not heat pump)	30
	Other	20

iii) exceptional cases, not meeting the requirements above, will be considered on a case by case basis.

\*Eligibility does not guarantee funding (see paragraph 3.7)

### 3.5 Pathway 2: Income and health

The Councils will also each identify in the administrative districts they serve, eligible households\* on low income and vulnerable to the effects of cold, as those that:

i) have a net income of £30,000 or less AND less than £30,000 in savings of any kind;

and

ii) have one or more members:

- with a limiting long term or terminal illness
- with a disability
- who are 60 years or over
- who are dependent children of 16 or under; or under 20 and in full-time education or approved training

iii) exceptional cases, not meeting the requirements above, will be considered on a case by case basis.

\*Eligibility does not guarantee funding (see paragraph 3.7). The Councils have undertaken a full Equalities Impact Assessment which has taken into account all of the protected groups. This can be made available on request.

### **3.6 Pathway 3: Caseworker assessment as part of frontline support**

Somerset Safe & Warm and Somerset Independence Plus are jointly delivering a fuel poverty service to the County of Somerset. Case workers for these organisations will be able to make a direct assessment of someone's personal circumstances and deem them in fuel poverty and vulnerable to the cold. This assessment may include, but may not be limited to; household income; household expenditure relative to income; and location i.e. IMD score for the Lower Super Output Area (LSOA) area of residence. **N.B.** There is not a qualifying list of LSOA's which agents/contractors can use to target households.

- 3.7 The final decision on whether any individual household can benefit from energy saving improvements under Affordable Warmth will be made by the obligated ECO suppliers or their agents/contractors. Inclusion in a Declaration, issued by each of the Councils as appropriate to a supplier, will not guarantee installation of measures, as the final decision will depend on: i) survey carried out by suppliers agents/contractors and installation costs calculated; ii) the energy savings that can be achieved for a property; and iii) whether suppliers have achieved their targets or require further measures to meet their ECO targets.

## **4 Contractor requirements**

- 4.1 Contractors will need to demonstrate that they have a direct contractual relationship with an energy supplier to deliver the ECO. Furthermore they will need to be PAS 2035 or Trustmark certified.
- 4.2 Upon approval (see 7.2) contractors will be required to purchase credit for their future declarations and maintain a minimum credit balance of at least the value of a dual measure; further details will be provided to contractors on approval.

## **5 Acting on behalf of another local authority**

- 5.1 Sedgemoor District Council will be acting on behalf of Mendip District Council, Somerset West and Taunton Council and South Somerset District Council as the Accountable Body for the purposes of the Warm Homes Project and has been granted delegated authority to consider and sign Declarations for and on behalf of any other Council for the joint ECO Flexible Statement of Intent.

## 6 Governance

- 6.1 At Sedgemoor District Council, Somerset Independence Plus sits within the Housing, Communities and Wellbeing Group. The Declaration of households who meet the relevant Council's Flexible Eligibility criteria for the joint statement of intent for the named district authorities will be signed off by Teresa Harvey (Assistant Director) Sedgemoor District Council or Christian Trevelyan Sedgemoor District Council.

## 7 Referrals

- 7.1 All potentially eligible households will need to apply for ECO Flex through the Home Energy Team at the Centre for Sustainable Energy. There is an administration fee of £50 for a single measure and £100 for a dual measure per property for all ECO Flex declarations (to be paid by the installer or energy supplier installing the measure) at no cost to the householder.
- 7.2 If you are an installer or managing agent and you wish to process ECO Flex declarations then you will need to contact the Centre for Sustainable Energy and sign their Code of Conduct (contact [ecoflex@cse.org.uk](mailto:ecoflex@cse.org.uk) for more information). They will then process the applications in line with the BEIS guidance including contacting the household to check their eligibility and then preparing the declarations for sign-off. The information will be passed to their ECO supplier according to the ECO application process.
- 7.3 Householders who believe they may be eligible for ECO Flex should contact the Home Energy Team directly (0800 082 2234 or <https://www.cse.org.uk/advice/contact-us>). The Home Energy Team will check eligibility in their initial conversation with the resident; they will also check that the resident is happy for their data to be stored and shared with a third party for the purposes of the scheme. The eligibility information will be recorded on a secure CRM. A referral will then be made to an obligated supplier or installer who has signed the Code of Conduct.
- 7.4 Households that are eligible under flexible eligibility may be identified through a number of referral routes and partners. The Home Energy Team provides impartial energy advice to residents of Somerset. Organisations who work with vulnerable low income households will be able to refer households to the service for assessment. The following details the types of organisations and front line staff who actively make referrals in Somerset:

- Somerset Independence Plus

- Arm's Length Management Organisation operating in each of the Councils served. For example, for Sedgemoor District Council this is Homes in Sedgemoor
- Wessex Resolutions CIC
- Third sector organisations i.e. the voluntary and community sector. Including Community Council for Somerset, Age UK
- Citizens Advice Bureaus
- Red Cross Home from Hospital and handy man services
- Credit Unions
- GP practices and frontline health staff
- Fire Service
- Parish & Town Councils
- Village agents
- Housing Associations

## **8 Evidence, monitoring and reporting**

8.1 The Home Energy Team will use its secure CRM to collate information on households which are eligible for ECO flexibility. The service will provide each Council with a monthly report detailing eligible householders and the reasons for approval. The following summarises the information to be collated to confirm eligibility:

- The EPC if already present for the householder i.e. showing the wall construction, property age etc.
- A self-declaration form signed by the householder confirming their eligibility based on the pathways set out above

8.2 The energy supplier that provides ECO funding is still required to collect all evidence associated with the necessity for a measure e.g. that the cavity wall is appropriate, the boiler is broken etc. The declaration of eligibility is not a substitute for this evidence and the Councils would expect this information to be collected and made available to Ofgem on request.



## **9 Data Protection**

- 9.1 The Councils are committed to working within the bounds of the Data Protection Act 2018 (the DPA 2018) and General Data Protection Regulation (GDPR).
- 9.2 Residents should note that:
- 9.2.1 In order to fully assess eligibility and deliver the services described in this Statement of Intent, the written consent to the sharing of personal, financial and health details will be required at the outset from both the resident, the parent or guardian of all residents under the age of 18 living with them and from all other persons over the age of 18 in the same household:
- 9.2.2 The delivery of the services described may necessarily require the sharing of personal, financial and health information between the Councils, CSE and/or with the other agencies referred to paragraph 7.4 above:
- 9.2.3 Contractors undertaking works to a residence should only be provided with a contact name and address:
- 9.2.4 Anonymised information will be provided by each Council to ECO and central government:
- 9.2.5 The Councils are legally obliged to comply with the Freedom of Information Act and the Environmental Information Regulations.

## **10 Fraud and Bribery**

The Councils each have a clear commitment and responsibility to minimise the possibility of fraud or other misuse of public money and assets. It pledges to take all action necessary to identify such cases and pursue the recovery of losses and the punishment and those responsible.

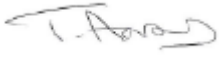
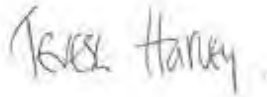


- 10.1 An applicant who tries to fraudulently claim support by falsely declaring their circumstances, providing a false statement or evidence in support of their application, may have committed an offence.

## **11 Safeguarding**

11.1 The Councils are committed to safeguarding children and vulnerable adults, by promoting the rights of people who use its services and safeguarding them from harm or neglect.

## 12 Signature

The following Authorities are signatories to this Joint Statement of Intent:

Participating Council	Signature
Mendip District Council	  <b>Title: Tracy Aarons Deputy Chief Executive</b>
Sedgemoor District Council	  <b>Title: Teresa Harvey Assistant Director – Housing, Communities &amp; Wellbeing</b>
Somerset West and Taunton Council	  <b>Title: Simon Lewis Assistant Director, Housing and Communities</b>
South Somerset District Council	  <b>Netta Meadows Title: Director, Service Delivery</b>

