



# Statement of Intent

## Local Authority Flexible Eligibility Statement of Intent

- 1) Mid Devon District Council
- 2) Date of publication: 1/2/18
- 3) Version 1.0
- 4) <https://www.middevon.gov.uk/ECOFlexibleEligibility>

### 1) Introduction

According to the Devon Joint Strategic Needs Assessment (2017), fuel poverty in Devon (13%) remains higher than the national average (10.6%). Mid Devon District Council's Public Health Plan 2016-19 identifies fuel poverty as a key priority area.

A number of health conditions arise or are exacerbated by living in a cold and/or damp home. These are included in this Statement of Intent (SOI).

To date, the Council has supported the implementation of the Central Heating Fund (now expired) as a member of the Cosy Devon Partnership. The Council also works in partnership with Wessex Resolutions CIC, a local not-for-profit lender, to provide home improvement loans for repairs and energy efficiency measures. The Cosy Devon Partnership, of which the Council is a member, also works with the Local Energy Advice Programme (LEAP). This year the Council is also looking to partner with one of the UK's largest energy switching providers to help residents get the best deal possible.

Mid Devon District Council welcomes the government's new Flexible Eligibility scheme so that those who don't qualify through existing schemes but are in fuel poverty can obtain financial help to install key energy measures.

It is important to note that the final decision on whether a household receives an ECO measure is made by the energy suppliers or their agents/contractors. For example, inclusion in a Declaration of Eligibility made by the Local Authority to a supplier will not guarantee installation of measures, as the final decision will depend on:

- i) The 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.

In identifying households as eligible under flexible eligibility Mid Devon District Council is seeking to enable residents to benefit from funding and will seek the consent of households to including them in a Declaration. Mid Devon District Council expects any obligated energy supplier, or contractor working on their behalf, to comply with the Data Protection Act, to fully follow Ofgem requirements for the Energy Company Obligation Help to Heat, and to act in accordance with industry best practice in relation to consumer care and quality standards of any works that may take place. These are covered in a separate memorandum of understanding between the Council and the obligated party.

## **2) How Mid Devon District Council intends to identify eligible households**

The Department of Business, Energy and Industry Strategy (BEIS) provides guidance on the targeting of Flexible Eligibility which seeks to identify private households that may benefit from energy saving measures and are:

- i) Fuel poor households, especially those that are not in receipt of Affordable Warmth eligible benefits, and the estimated 20% of fuel poor households that are not in receipt of any benefits; and
- ii) Low income households that are vulnerable to the effects of living in a cold home (LIVC)

In addition, LAs can declare some non-fuel poor homes as eligible to facilitate solid wall insulation projects, as long as a proportion of the households in the project are in fuel poverty or LIVC.

Subject to availability of resources within the Council and the legal use of data the Council will target those most in need having regard to BEIS guidance on targeting, including:

- i) Those living in the private sector and in receipt of the relevant means-tested benefits and/or on a low income
- ii) Those living in energy inefficient Residential Mobile Homes (Park Homes) who are over the age of 55
- iii) We will cross-reference data on income with data that we hold or can access on Energy Performance Certificates, prepayment meters, expenditure on fuel, housing type/age/condition, and heating type
- iv) Low income households living in energy inefficient housing will be identified in the private rented sector.
- v) Households receiving help through the LEAP project
- vi) Private tenants living in properties with D, E, F and G EPC rating

### ***(a) Identifying households in fuel poverty***

Private homeowners qualify to apply through ECO flexible eligibility subject to meeting category 1 and category 2 eligibility criteria below. Private tenants and residents of park homes will be eligible regardless of income.

## Category 1

For the 'low income' portion of this indicator, the referring agency will look to find evidence that a member of the household is in receipt of an ECO qualifying income-related benefit in the first instance. Should the resident not receive any ECO qualifying income-related benefits, then the referring agency will consider a household in receipt of Council Tax Benefit, Housing Benefit, or with a combined household income of less than £30,000 (gross) for the purposes of this criteria.

## Category 2

For the 'high cost' portion of the indicator, the referring agency, will look to identify eligible households as those that have an **Energy Performance Certificate (EPC) rating of 'D' or lower**. These properties will be identified using the Landmark online EPC register. In the event that a property does not meet this criteria or does not have an EPC, the referring agency will identify if the property falls into one of these additional categories which have been selected due to their high energy bills, hard to treat and hard to reach nature:

- Park homes and other permanent caravan residences (regardless of income)
- Privately rented properties including Houses in Multiple Occupation (HMOs) (regardless of income)
- Properties with a reliance on solid fuel heating
- Flats above commercial premises
- System built properties
- Homes which require cavity wall insulation
- Homes which require a loft insulation top up
- Homes which require solid wall insulation
- Homes with a boiler which meets the ECO Qualifying Boiler criteria

Council will use the Energy Savings Trust Home Analytics Data base that has been previously utilised by the Cosy Devon Partnership in targeting households for the Central Heating Fund. It will also use existing networks, such as community energy agencies, the community and voluntary sector and Council officer intelligence to identify eligible households.

### ***(b) Criteria for identifying low income and vulnerability to cold***

Mid Devon District Council will target households containing people with the following 'at risk' characteristics, which reflect the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess winter deaths and illness caused by cold homes.

- i. Aged over 60 (55 in the case of mobile homes), and particularly those over 75
- ii. Households with children under 16
- iii. Pregnant mothers

- iv. Private tenants on low income living in properties with D, E, F and G EPC rating
- v. Respiratory disease (chronic obstructive pulmonary disease (COPD), asthma)
- vi. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- vii. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
- viii. Types of Dementia or Creutzfeld-Jacob disease (CZD)
- ix. Neurobiological and related diseases (e.g. fibromyalgia, myalgic encephalomyelitis (ME) or similar fatigue syndromes)
- x. Cancer
- xi. Limited mobility
- xii. Haemoglobinopathies (sickle cell disease, thalassaemia)
- xiii. Severe learning disabilities
- xiv. Autoimmune and immunodeficiency diseases (e.g. lupus, multiple sclerosis (MS), diabetes, human immunodeficiency virus (HIV))

***(c) Any details of scheme requirements for Solid Wall Insulation “in-fill” projects***

Where potential works have been identified households will be supported to take advantage of "in-fill" projects where the minimum number of vulnerable households is met.

**3) Governance**

*Responsible officer*

The officer below will be responsible for signing Declarations on behalf of the local authority (in his absence the Director of Operations).

**Simon Newcombe**

Job title: Group Manager, Public Health and Regulatory Services

Telephone: 01884 244 615

Email: [snewcombe@middevon.gov.uk](mailto:snewcombe@middevon.gov.uk)

*Monitoring and Implementation*

The officer below will be responsible for initial enquiries about the Statement of Intent and the process for submitting and receiving declarations (in absence Lead Officer – Private Sector Housing).

**Kevin Swift**

Job title: Public Health Officer

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**4) Referrals**

Mid Devon District Council will use a number of referral mechanisms and pathways to identify and generate customers for ECO Flex as follows:

1. Use of the Home Analytics database to target households likely to fit the criteria.
2. Through the Local Energy Advice Program (LEAP) which is currently providing energy advice across Devon in partnership with Cosy Devon districts.
3. Previous applicants to the Central Heating Fund scheme that were not eligible or successful in securing assistance.
4. Referrals generated by community agencies, local energy agencies, contractors and installers.
5. Referrals generated as a result of Council staff interaction with householders, landlords e.g. Private sector housing, Benefits, Customer First (front of house)

**5) Evidence, monitoring and reporting [this section optional but best practice]**

- a. Anonymised data on the characteristics of households reached through Flexible Eligibility will be reviewed
- b. The data above will include details of households assessed, how many were deemed eligible and ineligible, and how many received heating and insulation
- c. Eligibility checks will be conducted internally using data sets held by Council in accordance with Data Protection guidance and legislation.
- d. Dedicated officers within Public Health and Regulatory Services will collect, collate and review data generated from the roll out of the program.

**6) Signature**

**Andrew Pritchard**

Director of Operations

Mid Devon District Council