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**Carlisle City Council ECO Flexible Eligibility Statement of Intent**

**Local authority: Carlisle City Council**

**Publication Date: 18th June 2018 Version: 1
Introduction**

This statement sets out Carlisle City Council’s flexible eligibility criteria for the Energy Company Obligation (ECO) scheme for April 2017 – March 2022 with the first 18 months until September 2018 (ECO2t) being a transition period. This is a new government initiative to allow a more flexible approach to enable more people to benefit from energy company grants. These grants can go towards insulation and heating measures including cavity wall and loft insulation, replacement oil boilers and new gas central heating systems. The local authority must publish a statement of intent defining how they are going to identify “eligible” households and the criteria on which properties and households can be subject to a “declaration” for inclusion in any schemes.

The ECO2T transition year until September 2018 includes a flexible eligibility component which will sit alongside the current main ECO scheme and is able to support those who have previously fallen outside of the criteria. Up to 10% of Energy suppliers ECO funding may be available to support Local Authority designed schemes to target 2 main categories of private sector housing tenure:

1. Households in fuel poverty
2. People living on a low income and vulnerable to the effects of living in a cold home.

This policy will support the City Council’s housing strategy with regard to tackling fuel poverty. Fuel poverty occurs when a household spends, or needs to spend, more than 10% of its income on heating its home to an adequate level of warmth. Excess Cold consistently comes out as the most common and significant hazard along with Damp and Mould Growth when inspections are carried out; both are caused by a lack of affordable heating and poor insulation.

More vulnerable residents, such as those living with an adaption in their property, may have more sedentary lifestyles that require higher room temperatures than the average homes; often living in poorly insulated homes, and with lower than average income, these residents are hit hardest by rising fuel prices. There is a need to ensure that there is a fall back for those residents whose heating fails during the coldest periods of the year.

However, recent figures1 indicate that more and more working families are being drawn into fuel poverty as well, and this needs addressing. With more people living in private sector accommodation, there is a need to address conditions in the private rented

1 Carlisle City Council Housing Strategy

sector, which consistently has the worst levels of Standard Assessment Procedure (SAP) ratings, with the most inefficient heating systems.

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**The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015** place obligations on private landlords

* ***From 1st April 2018****, a landlord of a private rented property with an EPC rating of F or G must not grant a new lease or renew an existing lease of that property until works have been carried out to improve the energy efficiency to a rating of E or above.*
* ***From 1st April 2020****, a landlord of a* ***domestic*** *private rented property with an EPC rating of F or G must not continue to let the property until works have been carried out to improve the energy efficiency rating to an E or above.*

Using a combination of enforcement and encouragement will help drive the delivery of these improvements to the housing stock.

The City Council currently has discretionary housing grants that it is able to offer through its Home Improvement Agency – Homelife Carlisle. The eligibility criteria will therefore aim to prioritise homes that have the poorest housing efficiency that may not qualify under the current Discretionary Housing Grants scheme. It will also aim to support current local initiatives to ensure that the widest amount of households benefit from the scheme.

Referrals made under ECO flexibility will be subject to the same market conditions as wider ECO energy efficiency work and so declarations that the local authority make do not guarantee that the measure will be viable. The final decision on whether a household receives an ECO measure is made by the energy suppliers or their contractors as the final decision will depend on:

1. the survey carried out by suppliers/contractors and installation costs calculated,
2. the energy savings that can be achieved for a property and
3. whether suppliers have achieved their targets or require further measures to meet their ECO targets.

**1. How the Local authority intends to identify eligible households**

ECO flexible eligibility is available to private sector households including owner occupiers, private landlords and private tenants in line with the Government’s guidance.

All potentially eligible households should apply through Homelife Carlisle Home Improvement Agency to ensure that any households that do not meet ECO flex criteria can be assessed for eligibility under the Discretionary Housing Grant scheme.

Homelife Carlisle will check their eligibility for standard ECO scheme, ECO flex criteria and eligibility for Discretionary Housing Grants. Sometimes a contribution is required by the customer towards the ECO measure and this may be met via a local grant for example.

**Criteria for identifying households in fuel poverty a) Low Income AND property inefficiency**

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Households should meet the income threshold **AND** meet the property inefficiency criteria by having an EPC of E, F or G or the guidance criteria by having a score of 5 or more to qualify **OR** meet the income threshold and meet the off-mains gas area criteria.

Carlisle City Council will target those most in need having regard to Department for Business, Energy and Industrial Strategy (BEIS) guidance

Those living in private sector housing and on a gross annual income of less than the tables below based on income thresholds for Universal Credit and Tax Credits and household composition. These income thresholds will be applied **after** deducting payments for their rent or mortgage:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Low Income Eligibility** | **0 children** | **1 Child** | **2 Children** | **3 children** | **4+ children** |
| **1 Adult** | £13,200 | £17,400 | £21,600 | £25,800 | £30,000 |
| **2 Adults** | £19,800 | £24,000 | £28,200 | £32,400 | £36,600 |
| **3+ Adults** | £26,400 | £30,600 | £34,800 | £39,000 | £43,200 |

With applicants consent we will use the Discretionary Housing Grants application process to identify low income owner occupiers.

Low income households living in energy inefficient privately rented housing will be identified through enforcement activity under the Housing Act 2004 and through the landlord accreditation scheme with their consent. We will encourage referrals through existing local partner referral networks.

**ii) How we assess Property inefficiency**

Where an EPC is present a household would qualify if they have an EPC rating of E, F or G. This is in line with the Government’s long-term fuel poverty strategy to ensure no fuel poor household is band E or below by 2025. If no EPC rating for the property is available then the guidance as in Appendix A will be used as developed by BEIS.

If the household achieves a score of 5 or above then it would qualify as being eligible.

Rural areas

In addition the City Council would be keen to target rural fuel poverty in off-gas areas (areas that do not have a mains gas supply).

Therefore any households will qualify that meet the qualifying income criteria **and**: ~ Lack cavity wall insulation OR

~ Have under 60mm loft insulation OR

~ Properties off the main gas network OR

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~ Any properties with mains gas that have not had central heating

1. **Low income and vulnerable to cold**

Priority will be based on those living in inefficient housing as these households are less likely to qualify under existing Discretionary Housing grants scheme. However households may also qualify if they are vulnerable to the effects of the cold due to having a low income and also have a member of the household with the following characteristic which reflects the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess Winter deaths and illness caused by cold homes:

~ Aged over 60

~ Children under 5 and pregnant mothers

~ Respiratory disease (COPD, Asthma)

~ Cardiovascular disease

~ Mental illness

~ Substance misusers

~ Dementia

~ Immuno-deficiency diseases

~ Cancer

~ Limited mobility

~ Learning difficulties

~ Diabetes (a condition that has been identified as a target area in Cumbia’s Joint strategic needs assessment)

Qualifying households still need to meet the income threshold criteria.

1. **Details of scheme requirements for Solid Wall In-fill projects**

In addition a proportion of non-fuel poor homes (in-fill) will be allowed for solid wall insulation projects if:

~ 66% of occupiers of blocks of flats, terraces, adjacent properties are fuel poor/low income and vulnerable to cold or

~ 50% of occupiers of semi-detached houses or bungalows and two premises buildings are fuel poor or low income and vulnerable to cold.

Ofgem has issued guidance on its administrative requirements for in-fill.

1. **Governance** *Responsible Officer*

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The officer below will be responsible for signing Declarations on behalf of the local authority:

Job Title: Scott Burns- Regulatory Services Manager

Telephone: 01228 817328

Email: scott.burns@carlisle.gov.uk The portfolio holder is: Lee Sheriff

1. **Referrals**

Referrals for consideration under ECO Flexible Eligibility can be received by Carlisle City Council via Homelife Carlisle Home Improvement Agency by the following:

Tel: 01228 817111 or Email: homelife@carlisle.gov.uk

Referrals will also be encouraged from local referral routes and partners as well as by potentially eligible households as identified by approved suppliers.

1. **Evidence, monitoring and reporting**

The City Council’s Home Improvement Agency will administer the scheme and identify eligible households via application process. The manager of Regulatory Services will oversee the process of identifying eligible households under flexible eligibility by use of Officer Decision Notices using anonymised data on monthly basis and usual City Council’s decision-making processes.

The eligibility information will be stored securely in line with the Council’s data protection policy, Information Commissioner’s Office Data sharing Code (legislation) and BEIS guidance. The City Council will issue declarations to its suppliers and/or delivery partner(s) setting out those households that are eligible. The delivery partner(s) will pass this information onto their ECO supplier according to the ECO application process.

The following summarises the information to be collated to confirm eligibility:

* The EPC if already present
* Evidence of household income
* Evidence of health condition / vulnerability

Declarations will include the following information: whether eligibility criteria is low income & vulnerable to the effects of living in a cold home (LIVC) or in fuel poverty (FP) and the proportion of households that met this criteria on any solid wall insulation

projects that include “in-fill”. The application form gives information to applicants on what checks may be carried out and penalties to deter and prevent fraud.

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Monitoring of ECO Flexible Eligibility will be carried out using the Home Improvement Agency grants procedure and via secure Case manager database that allows time frames of installations to be logged at each stage.

Home visits will be arranged on a random basis to check quality of works as agreed in the application process. Customer satisfaction will also be monitored by the use of follow-up customer satisfaction questionnaires.

The energy supplier that provides ECO funding is still required to collect evidence required by Ofgem as stated in BEIS guidance documents.

**6. Signature**

**Mark Lambert**

**Corporate Director of Governance and Regulatory Services**

**Appendix A**

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|  |  |  |
| --- | --- | --- |
| Question | Response | Score |
| How many bedrooms are there in your home? | 1 | 0 |
| 2 | 10 |
| 3 | 17 |
| 4 | 27 |
| 5+ | 36 |
| Are energy payments made By direct debit? | Yes | -7 |
| No | 0 |
| What type of house is it? | Semi-detached | -4 |
| Detached | 6 |
| Mid Terrace | -10 |
| End terrace | -4 |
| Converted flat | -9 |
| High rise flat | -20 |
| Low rise flat | -34 |
| Bungalow | 0 |
| Was the home built before 1964? | Yes | 17 |
| No | 0 |
| No response | 17 |
| What is the main heating fuel used in your home? | Gas | -14 |
| Electricity | 0 |
| Oil | 12 |
| Other | -10 |
| Does at least one member of the household spend most of the day at home? | Yes | 1 |
| No | 0 |