

Carlisle City Council ECO Flexible Eligibility Statement of Intent

Local authority: Carlisle City Council

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Version: 3

URL: <https://www.carlisle.gov.uk/Residents/Housing-and-Homeless/HomeLife>

Introduction

This statement sets out Carlisle City Council's flexible eligibility criteria for the Energy Company Obligation (ECO3) scheme from October 2018 – March 2022. This is a 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 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. A percentage of Energy suppliers ECO funding may be available to support Local Authority designed schemes to target two main categories of private sector housing tenure:

- A) Households in fuel poverty
- B) 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.

Some residents may have more sedentary lifestyles that require higher room temperatures or those living in poorly insulated homes, or with lower income, 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 sector, which consistently has the worst levels of Standard Assessment Procedure (SAP) ratings, with the most inefficient heating systems.

¹ Carlisle City Council Housing Strategy

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.

The government has also introduced 'Green Homes Grants' which are targeted towards low income households who are living in the poorest performing homes with regard to energy efficiency particularly those with an EPC of E, F or G. The City Council has decided, where possible, to have a similar lower income threshold as that suggested by the Government's for eligibility for Green Homes Grants.

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:

- a) the survey carried out by suppliers/contractors and installation costs calculated,
- b) the energy savings that can be achieved for a property and
- c) 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 or one of their approved ECO installers to ensure that any households that do not meet ECO flex criteria can be assessed for eligibility under the Discretionary Housing Grant scheme or potentially LAD schemes of Green Homes Grants.

Homelife Carlisle will check their eligibility for standard ECO scheme, ECO flex criteria, LAD Green Homes Grants (where available) 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.

**(ECO) Energy Company Obligation –
Carlisle City Council Flexible Eligibility Criteria**

<p>To qualify households should match 1 or more of the options below</p>	<p>Qualification Criteria:</p> <p>You must own your own home or rent from a private landlord (private sector households only)</p>
<p>Option A Low Income & in receipt of benefits</p>	<p>Households in receipt of:</p> <ul style="list-style-type: none"> ~Housing benefit/Local housing allowance ~Council Tax Reduction benefit or second adult rebate (means-tested) ~Tax Credits ~ Pension savings credit ~Any other means-tested welfare benefit <p>(* NOTE: most households in receipt of another welfare benefit will now qualify under Affordable Warmth (main ECO))</p>
<p>Option B Low Income and NOT in receipt of benefits</p>	<p>Households who are not in receipt of benefits should have a total net household income not exceeding the following thresholds per annum including pensionable and/or employable income:</p> <ul style="list-style-type: none"> ~ £30,000 per annum
<p>Option C Low Income AND property inefficiency</p>	<p>Households who are not in receipt of benefits should have a total net household income not exceeding the following thresholds per annum including pensionable and/or employable income:</p> <ul style="list-style-type: none"> ~ £30,000 for 1 or 2 person households ~ £32,000 for 3 person households ~ £38,000 for 4+ person households <p>AND</p> <p>Have an inefficient property by having:</p> <p>Either:</p> <ul style="list-style-type: none"> ~ an EPC of D, E, F or G OR ~ no mains gas central heating (including rural non-gas properties and properties without mains gas central heating)
<p>Option D Private rented property with an EPC of E, F or G**</p>	<p>Households that have a valid private rented tenancy of at least 6 months or private landlords who will commit to renting properties with an EPC of E, F or G</p>

<p>Option E Low income and vulnerable to the effects of the cold</p>	<p>Households who are not in receipt of benefits should have a total net household income not exceeding the following thresholds per annum including pensionable and/or employable income:</p> <ul style="list-style-type: none"> ~ £30,000 for 1 or 2 person households ~ £32,000 for 3 person households ~ £38,000 for 4+ person households <p>AND have a member of the household with one of the following characteristics:</p> <ul style="list-style-type: none"> ~ Aged over 60 ~ Children under 5 & pregnant mothers ~ Respiratory disease (COPD, Asthma) ~ Cardiovascular disease ~ Mental illness ~ Substance misusers with medical prescription ~ Dementia ~ Immuno-deficiency diseases ~ Cancer and under treatment ~ Limited mobility ~ Learning difficulties ~ Diabetes ~ Contribution based ESA
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***NOTE: If you receive one of the following benefits you will qualify under main ECO3:** Pension Guarantee Credit, Income-related ESA, Income based JSA, Income support, Working and Child Tax Credits, Universal credit, Armed forces independence payment, Attendance Allowance, Carer’s Allowance, Disability Living Allowance, Severe Disablement Allowance, War pensions mobility supplement, Industrial Injuries disablement benefit, Personal Independence Payment, Constant attendance allowance.

** Some measures are not available to private rented properties under ECO depending on the EPC rating.

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.

Carlisle City Council reserves the right not to issue declarations where installers have not been approved by The City Council. Installers should have signed and comply with our data-sharing agreement.

3) Governance

Responsible Officers

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

Job Title: Emma- Kate Bishop – Home Improvement Agency Team Leader

Telephone: 01228 817443 Email: emma.bishop@carlisle.gov.uk

Job Title: Scott Burns- Regulatory Services Manager

Telephone: 01228 817328 Email: scott.burns@carlisle.gov.uk

The portfolio holder is: Cllr Nedved

4) Referrals

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

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.

5) Evidence, monitoring and reporting

The City Council's Home Improvement Agency (HIA) will administer the scheme and identify eligible households via application process. Officer Decision Notices will be used to monitor the process using anonymised data 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 when required
- Evidence of household income
- Evidence of health condition or vulnerability which may include current medical prescriptions. It is the Home Improvement Agency's decision as to what

documents are acceptable as evidence ultimately. Guidelines of acceptable documents are available from the HIA on request.

- Evidence of private rented property where necessary

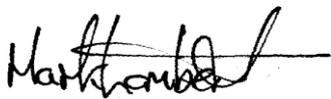
Declarations will include the following information: whether eligibility criteria are low income and vulnerable to the effects of living in a cold home (LIVC) or in fuel poverty (FP) and the proportion of households that met this criteria on any solid wall insulation projects that include “in-fill”. The application form gives information to applicants on what checks may be carried out and penalties to deter and prevent fraud.

Monitoring of ECO Flexible Eligibility will be carried out using the Home Improvement Agency grants procedure and via secure Casemanager database that allows time frames of installations to be logged at each stage. Approved contractors may also use a welfare benefit checking tool.

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

A handwritten signature in black ink, appearing to read 'Mark Lambert', with a long horizontal stroke extending to the right.

Mark Lambert

Corporate Director of Governance and Regulatory Services

Dated: 2 March 2021