

Wiltshire Council
ECO Flexible Eligibility Statement of Intent
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1 Introduction

1.1 Fuel poverty can cause low income and vulnerable households to live in cold, unhealthy homes and push them further into a spiral of debt and exacerbate existing health conditions. Wiltshire Council welcomes the new local authority Flexible Eligibility powers for Energy Company Obligation (ECO) Affordable Warmth grant as a means to help address these issues. These powers will allow the Council to provide affordable warmth assistance to fuel poor households that are not eligible under the existing criteria and to low income households that are vulnerable to the effects of cold. Further details about Flexible Eligibility are set out in the Government's '[Energy Company Obligation \(ECO\): Help to Heat](#)' consultation response document.

1.2 The most recent fuel poverty statistics trend for English region shows that Wiltshire has 9% of households in the county live in fuel poverty¹. This equates to 18,426 homes: a figure that will only increase as fuel prices rise, which they are predicted to do over the coming years².

1.3 The Joint Strategic Needs Assessment identifies cold homes as a particular problem for older persons and vulnerable persons. Excess Winter Death rates are a key indicator of the impact of cold weather on health. In Britain there are approximately 20% more deaths in winter than summer; but in other, much colder, countries the excess is smaller indicating that the impact could be reduced. In Wiltshire, there were 270 excess winter deaths in 2016/17, a value of 18.2 on the excess winter deaths index (all persons).³

1.4 ECO Flexible Eligibility will contribute towards the aims of the Council's Business Plan (2017-2027), Joint Health and Wellbeing Strategy (2019-2022), Energy Change and Opportunity Strategy (2011-2020) and the Economic Strategy and the SWLEP – Swindon and Wiltshire Local Energy Strategy (2018). This includes:

- Protecting those who are most vulnerable (Business Plan)
- Tackling inequalities: Addressing the wider determinants of health such as housing, unemployment, homelessness, education, social isolation, transport and community safety. Ensuring those who have the most need in our communities are as healthy as everyone else. (HWB Strategy)

¹ Public Health Profiles, 2016 data.

² BEIS (2016) Fossil Fuel Price Assumptions

³ Office of National Statistics – Excess Winter Deaths

- Accessibility to good, stable accommodation, underpins good physical and mental health (HWB Strategy)
- Increasing the numbers of energy efficient, safe, healthy and affordable homes to live in
- Enabling financial assistance to vulnerable and low income owner occupiers
- Reducing carbon emissions from the domestic sector
- Strengthening the local economy (Business Plan)

1.5 In December 2015 the Council relaunched its Warm and Safe Wiltshire service to help deliver energy saving advice and efficiency measures to local residents. Integrated into Public Health the service provides a single point of contact, cold homes referral mechanism which ties into existing council and partner referral services to help vulnerable residents to live in warmer, healthier homes.

1.6 Since its relaunch the service has advised over 3700 households to save energy and money.

1.7 The Council will use the Warm and Safe Wiltshire service to market ECO grant to residents, provide advice on energy saving options through the telephone advice service and then assess each resident's eligibility against the local Flexible Eligibility criteria.

2. Eligible households

2.1 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).

2.2 All potentially eligible households will need to apply through the Warm and Safe Wiltshire service in order to be assessed (telephone 0800 038 5722 or see www.warmandsafewiltshire.org.uk for more options). The service will check eligibility in their initial conversation with the resident; they will also check that the resident is happy for their data to be shared. The eligibility information will be recorded onto a customer relations management database for Warm and Safe Wiltshire, and available for the Council to view.

2.3 The Council will issue regular Declarations to their ECO supplier setting out those households that are eligible. The ECO supplier will pass this information onto their accredited ECO installer according to the ECO application process. The supplier will be expected to report on the progress of the referral to ensure that the Council has visibility of the support provided.

2.4 The Council will identify eligible households in fuel poverty as those that:

- 2.5 Have an income of £30,000 or less AND less than £5,000 in savings of any kind; AND
- i) have an EPC Band D or below OR
 - ii) score 35 or above in their responses to the following high cost questions:

Does the home use a boiler?	Yes	0
	No	5
An unfilled cavity wall	Yes	35
	No	0
Was the home built before 1964?	Yes	25
	No	0
What is the main fuel type?	Gas	0
	Electricity	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 2.9)

2.6 The Council will also identify eligible households* on low income and vulnerable to the effects of cold, as those that:

- i) have an income of £30,000 or less AND less than £5,000 in savings of any kind; and
- ii) have one or more members:
 - a. with a limiting long term or terminal illness
 - b. with a disability
 - c. who are 60 years or over
 - d. 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 2.9)

2.6 The Council intends to support regeneration projects across the county where solid wall insulation is technically feasible, permitted under Planning legislation and can attract funding. The Flexible Eligibility powers also allow for homes, in these types of projects, that are not in fuel poverty or vulnerable to be funded. This means that the aesthetic benefits of external solid wall insulation and the economies of scale from working in localised areas can be realised.

The Council would also like to support the insulation of park homes, which usually have poor energy efficiency.

2.7 Non-fuel poor households eligible for solid wall insulation in-fill must be:

- in the same terrace as
- in an immediately adjacent building to, or
- are in the same building as a household that does meet the criteria

- back to back entire terraces, but only if the back of the actual properties are touching (not back to back garden / alleyway separates the terrace).

2.8 For each project, infill eligibility must meet the minimum percentages set out below:

Property Type	LA declaration requirements	In-fill available
Project consisting of a pair of semi-detached houses or bungalows, or a building containing no more than two domestic premises	At least one of the two-properties must be declared by the Council as fuel poor i.e. 50% of the properties must be fuel poor	The other property to which it is directly adjoined is eligible for solid wall insulation.
Project consisting of any premises that are contained in the same building (e.g. flats), immediately adjacent buildings (e.g. neighbouring detached properties) or in the same terrace	At least two in three properties on the list must be declared by the Council as fuel poor i.e. at least 66% of the properties are fuel poor	The other (i.e. up to one third) of properties in the project are eligible for solid wall insulation, provided they are either in the same building, an immediately adjacent building or in the same terrace as the ones identified as fuel poor

2.9 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 the Council 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.

3. Contractor requirements

3.1 Contractors will need to demonstrate that they have a direct contractual relationship with an energy supplier to deliver ECO. Furthermore, they will need to be PAS 2035 or Trustmark certified.

3.2 Upon approval (see 6.2) contractors will be required to purchase credit for their future declarations. A minimum balance of £100 is required with an opening purchase of £500.

4. Acting on behalf of another local authority

4.1 n/a

5. Governance

5.1 The Warm and Safe Wiltshire service is provided by Wiltshire Council in partnership with Dorset & Wiltshire Fire and Rescue Service and the Centre for Sustainable Energy. It is comprised of Council staff, from Public Health.

5.2 The Declaration of households who meet the Council's Flexible Eligibility criteria will be signed off by Rachel Kent, Public Health Consultant or Richard Francis, Public Health Specialist.

6. Marketing & Referrals

6.1.1 Wiltshire Council and its partners will identify eligible households through the Warm and Safe Wiltshire service, managed by the Centre for Sustainable Energy. This may result from residents phoning or emailing the service following marketing or following a referral to the service from a frontline worker. Wiltshire Council also received referrals via the Safe and Independent Living (SAIL) forms. 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.

6.1.2 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 (installers@cse.org.uk). 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.

6.2 General marketing that has proved effective for Warm and Safe Wiltshire includes:

- Mail outs to households
- Leaflets with blue badge applications
- Leaflets with bus pass renewals
- Doctor surgery mailouts

6.3 In order to target its marketing towards those households that are vulnerable to the effects of cold, the Council will:

- work closely with Public Health to identify routes to vulnerable households such as flu vaccine marketing
- carry out briefings for frontline Council staff and other agencies to encourage referrals, including housing and environmental health staff, health and social care workers, Mears, Age UK and Citizens' Advice

- target homes where income, property and health data indicate the householders may be eligible,

7. Evidence, monitoring and reporting

7.1 The number of households eligible for ECO Flexible Eligibility will be recorded by Warm and Safe Wiltshire service in their monthly monitoring report. This will be split into fuel poor homes and those on a low income and vulnerable to the effects of living in cold homes.

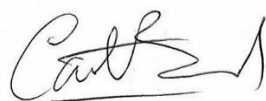
7.2 The number of ECO Flexible Eligibility funded measures installed and the number of homes improved will be reported by the supplier. This will be split into fuel poor homes and those on a low income and vulnerable to the effects of living in cold homes.

7.3 Each eligible household will be asked to sign a self-declaration form when agreeing with the supplier to go ahead with works. The self-declaration form will be designed to prevent fraud. The data protection authority form will inform applicants that the Council may carry out further checks with HMRC to confirm their eligibility. Medical prescriptions use a similar system of self-declaration. This will be stored on a CRM at the Centre for Sustainable Energy.

8. Statement of Intent authorisation

Signed by:

Date: 18 November 2019



Dr Carlton Brand
Executive Director Adult Care, Public Health & Digital
Wiltshire Council