

SUBJECT:	MONMOUTHSHIRE ECO FLEX ‘STATEMENT OF INTENT’.
MEETING:	ICMD
DATE:	12th June 2019
DIVISION/WARDS AFFECTED:	All

1. PURPOSE:

- 1.1 The purpose of this report is to seek approval to implement the Council’s “Statement of Intent” that will allow Monmouthshire residents access to funding under the Energy Company Obligation (ECO): Help to Heat programme. The statement will support households who are most likely to experience fuel poverty and those vulnerable to the effects of a cold home.

2. RECOMMENDATIONS:

- 2.1 To agree and adopt the Council’s “Statement of Intent” and its participation in the ECO Help to Heat Scheme.

3. KEY ISSUES:

- 3.1 Energy Company Obligation (ECO) funding is a requirement placed on energy companies over a certain size to help improve domestic energy performance in the homes of the vulnerable. ‘Flexible Eligibility’ allows councils to set their own criteria to extend the funding outside of the normal rules of ECO (usually based on qualifying benefits).
- 3.2 Monmouthshire County Council see ECO Flexible Eligibility fitting well within the aims of the Home Energy Service and is happy to support its use to provide additional funding for energy efficiency measures to eligible residents in the county. It estimated that approximately 22% of households are in fuel poverty in Monmouthshire (Research carried out by Building Research Establishment (BRE) the data covered 2012-2016).
- 3.3 The funding can be used for the installation of an energy efficiency measure (‘measures’) such as cavity wall insulation, loft insulation, boiler repairs and first time central heating. This list is not exhaustive and the measures available will change over time. Some measures can be fitted free to eligible households whilst other measures may require a customer contribution. Whenever possible the Home Energy Service aims to find additional funding for eligible households to reduce any customer contribution needed.
- 3.4 The attached ‘Statement of Intent’ sets out the extended criteria on eligibility and the process by which householders can access the funding. The drafting of the Statement has followed the Department for Business, Energy & Industrial Strategy’s document ‘Energy Company Obligation: ECO3, 2018 – 19 Flexible Eligibility Guidance’.
- 3.5 Funding is only available for owner-occupier and private rented tenant households. To qualify for flexible eligibility funding, households will have to satisfy criteria within the attached ‘Statement of Intent’.
- 3.6 The final decision on whether a household receives a measure under ECO flexible eligibility or other ECO funding stream will rest with the energy supplier or their agent/contractor. Qualification in the statement of intent or the declaration by Monmouthshire County Council will NOT guarantee installation of any measures,

3.7 Energy suppliers and/or their agents involved with flexible eligibility surveys will comply with the Data Protection Act and they will need to undertake work in accordance with OFGEM requirements and act in accordance with industry best practice in relation to consumer care and quality standards.

3.8 The following scenarios could qualify for assistance under the scheme (See Appendix 1):

- i) Where households have a low income and high heating costs; or
- ii) Where households have a low income and have vulnerabilities which make them particularly susceptible to the cold; or
- iii) Where homes are in-fill properties for the purpose of solid wall insulation.

3.9 The scheme will be fully funded via energy suppliers obligated under ECO

4. OPTIONS APPRAISAL:

4.1 Option 1: The Recommended Option - To publish a 'Statement of Intent' regarding flexible eligibility criteria, thereby allowing Monmouthshire residents suffering from fuel poverty, access to funding under the Energy Company Obligation (ECO): Help to Heat programme. This is the preferred option.

4.2 Option 2 - Not to publish a 'Statement of Intent'. This option prevents vulnerable Monmouthshire residents accessing funding under the Energy Company Obligation (ECO): Help to Heat programme and leaves them open to suffering from fuel poverty. It is therefore discounted.

5. EVALUATION CRITERIA:

5.1 An evaluation report can be found at **Appendix 2**.

6. REASONS:

6.1 It is the expectation of Welsh Government that the Council supports this proposal to support low income and vulnerable households.

6.2 The Council made the decision a number of years ago to withdraw discretionary private sector housing funding, such as renovation grants. There are, therefore, no alternative funding streams available to householders.

7. RESOURCE IMPLICATIONS:

7.1. There are no financial or resource implications for the Council.

8. SUSTAINABLE DEVELOPMENT AND EQUALITY IMPLICATIONS:

8.1 The Future Generations Evaluation has been completed and no negative implications were identified (**See Appendix 2**)

9. SAFEGUARDING AND CORPORATE PARENTING IMPLICATIONS

9,1 The policy supports and contributes positively to these priorities (**See Appendix 2**)

10. CONSULTEES:

10.1 Head of Planning, Housing and Place-shaping, Enterprise, DMT, SLT

11. BACKGROUND PAPERS:

12. **AUTHOR:** Stephen Griffiths, Strategy & Policy Officer

13. CONTACT DETAILS:

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Monmouthshire County Council

Local Authority ECO Flexible Eligibility Statement of Intent

Date of publication: ?/?/2019

Version: 1

Valid from: 25 January 2019

www.monmouthshire.gov.uk/ [provide specific URL to the website where it is published]



1) Introduction

Monmouthshire County Council is committed to supporting residents vulnerable to fuel poverty and cold homes. Working with the South East Wales Energy Agency, a local fuel poverty charity, the council has developed the Home Energy Service which acts as a one-stop-shop for all home energy and warmth needs. The service provides advice, support and access to funding aimed at assisting those residents who own their own home or rent privately and are at risk of fuel poverty, or impaired health as a result of living in a cold and/or damp home.

2) Background

Energy Company Obligation (ECO) funding is a requirement placed on energy companies over a certain size to help improve domestic energy performance in the homes of the vulnerable. 'Flexible Eligibility' allows councils to set their own criteria to extend the funding outside of the normal rules of ECO (usually based on qualifying benefits).

Monmouthshire County Council see ECO Flexible Eligibility fitting well within the aims of the Home Energy Service and is happy to support its use to provide additional funding for energy efficiency measures to eligible residents in the county.

This Statement of Intent sets out the extended criteria and how householders can make applications to access the funding.

The funding can be used for the installation of an energy efficiency measure ('measures') such as cavity wall insulation, loft insulation, boiler repairs and first time central heating. This list is not exhaustive and the measures available will change over time. Some measures can be fitted for free to eligible households whilst other measures may require a customer contribution. Whenever possible the Home Energy Service aims to find additional funding for eligible households to reduce any customer contribution needed.

3) How the council intends to identify eligible households

Identifying Eligible Households.

Monmouthshire County Council considers that three groups of households eligible for assistance with the installation of energy saving measures under the Flexible Eligibility arrangement:

- I. Where households have a low income and high heating costs
- II. Where households have a low income and have vulnerabilities which make them particularly susceptible to the cold

III. Where homes are in-fill properties for the purpose of solid wall insulation.

The first two groups of households may be on low incomes, yet not sufficiently low as to be eligible for benefits. Previous ECO and other grant schemes have overlooked these residents and we are delighted to be able to seek support for them under Flexible Eligibility.

Determining Household Eligibility Criteria (Household Groups i and ii).

When determining eligibility all households must satisfy the Criteria 1 (Low Income) and either Criteria 2 (high heating costs) or Criteria 3 (vulnerability to living in a cold home),

I.E. Eligible household = Low Income (criteria 1) + High Heating Costs (criteria 2) **OR** Low Income (criteria 1) + Vulnerability to Cold (criteria 3).

Criteria 1 Eligibility – Low Income is determine by using the monetary values in the table below. Please note that these values may change from time to time. Updated values will be published on our website when applicable.

Household composition	Annual household income after deducting rent or mortgage costs	Monthly household income Equivalent after deducting rent or mortgage costs
1 adult (18 years and over)	£8,900	£740
and 1 child	£11,700	£980
and 2 children	£14,400	£1,200
and 3 children	£17,300	£1,440
and 4 or more children	£20,100	£1,680
2 adults (18 years and over)	£14,600	£1,220
and 1 child	£17,400	£1,450
and 2 children	£20,200	£1,680
and 3 children	£23,100	£1,930
and 4 or more children	£25,700	£2,140

Criteria 2 Eligibility – High heating costs will be assessed either as:

- a. A home with an Energy Performance Certificate (EPC) in bands E, F or G or
- b. A home that scores 50 or more from the table below.

Question	Answer	Score
How many bedrooms are there in the home?	1	0
	2	10
	3	20
	4	30
	5	40
	6 or more	50
What type of home is it?	Detached	30
	Semi- detached	20
	Mid terrace	10
	End terrace	20
	Flat	20
	Bungalow	30
Are energy payments made by Direct Debit?	Yes	0
	No	10
Was the house built before	Yes	20

1964 or system built?	No	0
What is the main heating fuel?	Mains Gas	0
	Electricity	20
	Other	20
Is the property a Park Home?	Yes	30
	No	0
Is the household a High Energy User? (Using over 23,000 kWh of gas or 5,100 kWh of electricity a year.)	Yes	10
	No	0

Criteria 3 Eligibility – To determine vulnerability a full time member of the household must satisfy one or more of the following criterion:

- a) Health can be a major factor in how much heat is required in a property. Therefore, health criteria will be important in assessing flexible eligibility.
- i. Cardiovascular condition (incl. coronary heart disease, stroke, hypertension, transient ischemic attack)
 - ii. Respiratory condition (incl. COPD, asthma)
 - iii. Neurological or neurobiological condition (incl. dementia, Parkinson’s disease, MS, epilepsy, fibromyalgia, ME)
 - iv. Musculoskeletal conditions (incl. arthritis, limited mobility, recently attended hospital due to a fall)
 - v. Blood conditions (incl. Sickle cell disease, thalassemia)
 - vi. Cancer
 - vii. Moderate to severe mental illness (incl. schizophrenia bipolar disorder and depression where receiving regular treatment)
 - viii. Severe learning disabilities
 - ix. Autoimmune or immunodeficiency diseases (e.g. lupus, diabetes, HIV)
 - x. Terminally ill
 - xi. Other illness exacerbated by cold (confirmed by GP)
 - xii. A substantial and permanent disability and is in receipt of Disability Living Allowance, Attendance Allowance or Personal Independence Payment
- b) Age can also be a factor in how much heat is required to achieve affordable warmth, with older and younger residents being particularly adversely affected.
- i. An adult aged 60 or over
 - ii. A child under the age of 5
 - iii. Is pregnant.

Determining Property Eligibility Criteria (Household Group iii - Solid Wall Properties)

Where a property is of Solid Wall or System Built Construction, Monmouthshire County Council would be delighted to support the installation of solid wall insulation. We will therefore agree to complete Declarations for those households (regardless of income or vulnerability) who fulfil the in-

fill criteria. Where a household does not meet the criteria for Fuel Poverty (FP) or Low Income Vulnerable to Cold (LIVC), an LA can declare a household as “in-fill” where they are:

- a) in an immediately adjacent building, such as a semi-detached property; or
- b) in the same terrace; or
- c) are in the same building, such as a flat, as a household that does meet those criteria.

In the case of (a) at least one of the two properties has a household group that satisfy the FP or LIVC criteria; and in the case of (b) and (c) 66% of the properties have a household group that satisfy the FP or LIVC criteria.

4) Governance and Process

Monmouthshire County Council work with the South East Wales Energy Agency (SEWEA) to promote energy efficiency advice and the installation of energy efficiency measures to support those in fuel poverty. SEWEA will manage the Flexible Eligibility process on behalf of the Council and its Helpline (01633 223111) will be used to assess householder eligibility against the low income/vulnerability criteria set out above.

All eligible householders will be asked to complete a self-certification form and may be asked to provide documents in support of their eligibility. SEWEA will then seek a signed Declaration from the council which enables the relevant supplier to claim the ECO funding required to enable the requested energy efficiency measure to be installed.

Steve Griffiths, Strategy & Policy Officer, Housing & Communities will sign off Declarations on behalf of the council and will audit 3% of applications to ensure compliance with the published eligibility criteria.

5) Householder Application

Any Monmouthshire householder who believes that they may be eligible for help under flexible eligibility should contact the SEWEA Helpline on 01633 223111 or email advice@sewenergy.org.uk. SEWEA will check eligibility status and will supply an application form that will require the applicant to self-certify their income and secondary eligibility criteria. When approved they will refer the resident to an assessor or installer to take the process further.

Referrals can be made by a third party and would include Care & Repair, Citizens Advice, Credit Union, Care Providers, etc., with the above self-certification also being required.

However, being eligible is not a guarantee that measures will be installed. A final decision on whether any individual household can benefit from energy saving improvements under this strand of ECO will be made by the obligated suppliers or their agents/contractors. Inclusion in a Declaration issued by us does not guarantee the installation of measures.

6) Supplier/Installer Network

Any supplier or installer who seeks a council Declaration on behalf of an eligible householder will first need to be registered with SEWEA. This ensures that the council has information about the standards, practices and accreditations of installers working in the county so reducing the risk of fraud, poor quality installations and the exploitation of vulnerable residents that the council is looking to assist. For further information, call SEWEA on 01633 223111 or email advice@sewenergy.org.uk.

All suppliers, agents and contractors will have to comply with the General Data Protection Regulations and Data Protection Act 2018.

7) Signature

Signatory for Flexible Eligibility Statement of Intent

..... Date: 2019

Mr Mark Hand, Head of Planning, Housing and Place-Shaping,
Monmouthshire County Council.



Future Generations Evaluation (includes Equalities and Sustainability Impact Assessments)

<p>Name of the Officer completing the evaluation Stephen Griffiths</p> <p>Phone no: 01633 644455 E-mail: stephengriffiths@monmouthshire.gov.uk</p>	<p>Please give a brief description of the aims of the proposal</p> <p>The publication of the Council's Statement of Intent</p> <p>The Statement of Intent sets out the criteria to establish vulnerable household in Monmouthshire eligible for funding under the ECO flexible funding scheme.</p>
<p>Name of Service</p> <p>Housing & Community Services</p>	<p>Date Future Generations Evaluation form completed</p> <p>27th February 2018</p>





1. **Does your proposal deliver any of the well-being goals below?** Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal.


Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
<p>A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs</p>	Neutral Contribution.	
<p>A resilient Wales Maintain and enhance biodiversity and</p>	Positive Contribution	Improving the energy efficiency of properties will

ecosystems that support resilience and can adapt to change (e.g. climate change)		reduces energy consumption and therefore carbon emissions.
A healthier Wales People's physical and mental wellbeing is maximized and health impacts are understood	It positively contributes to the health occupants of properties that are of sub-standard quality through their refurbishment that will make them warmer.	Improving the energy efficiency of properties will reduce energy consumption and help households out of fuel poverty.
A Wales of cohesive communities Communities are attractive, viable, safe and well connected	It positively contributes through the refurbishment of substandard houses and by returning empty properties back into use.	
A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental wellbeing	Through the provision of good quality housing	
A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation	A neutral contribution	

2. How has your proposal embedded and prioritised the sustainable governance principles in its development?

Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
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Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
 <p>Long-term Balancing short term need with long term and planning for the future</p>	<p>Improvements made to qualifying properties and households will meet the short-term needs of the household (reducing fuel poverty and increasing better health). Improved properties will add to the number of good quality houses that will be available in the long term and contribute to a lower carbon footprint.</p>	
 <p>Collaboration Working together with other partners to deliver objectives</p>	<p>Not Applicable</p>	
 <p>Involvement Involving those with an interest and seeking their views</p>	<p>Not Applicable</p>	
 <p>Prevention Putting resources into preventing problems occurring or getting worse</p>	<p>Not applicable</p>	

Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
 <p data-bbox="120 363 264 395">Integration</p> <p data-bbox="85 400 479 480">Positively impacting on people, economy and environment and trying to benefit all three</p>	<p data-bbox="517 231 1077 263">Through the availability of good quality housing.</p>	

3. Are your proposals going to affect any people or groups of people with protected characteristics? Please explain the impact, the evidence you have used and any action you are taking below.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Age	Positive	None	
Disability	Positive	None.	
Gender reassignment	None	None	
Marriage or civil partnership	None	None	
Race	none	None	
Religion or Belief	None	None	
Sex	None	None	
Sexual Orientation	None	None	
Welsh Language	None	None	

4. Council has agreed the need to consider the impact its decisions has on important responsibilities of Corporate Parenting and safeguarding. Are your proposals going to affect either of these responsibilities? For more information please see the guidance note <http://hub/corporatedocs/Democratic%20Services/Equality%20impact%20assessment%20and%20safeguarding.docx> and for more on Monmouthshire's Corporate Parenting Strategy see <http://hub/corporatedocs/SitePages/Corporate%20Parenting%20Strategy.aspx>

	Describe any positive impacts your proposal has on safeguarding and corporate parenting	Describe any negative impacts your proposal has on safeguarding and corporate parenting	What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?
Safeguarding	None	<i>No negative impacts</i>	
Corporate Parenting	None	No negative impacts	

5. What evidence and data has informed the development of your proposal?

None

6. **SUMMARY:** As a result of completing this form, what are the main positive and negative impacts of your proposal, how have they informed/changed the development of the proposal so far and what will you be doing in future?

The main positive benefits of the proposal are:

- Improving the quality of sub-standard housing.
- Improving the quality of life for those living in substandard low quality housing
- Reducing the impact of fuel poverty on households
- Reducing carbon footprint

The main negative impacts are: None identified to date

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7. Actions. As a result of completing this form are there any further actions you will be undertaking? Please detail them below, if applicable. Yes

What are you going to do	When are you going to do it?	Who is responsible	Progress
Submit to Individual Cabinet Member Decision	June 26 2019	Stephen Griffiths	
Review the Policy and submit to Select	March 2020	Stephen Griffiths	

8. Monitoring: The impacts of this proposal will need to be monitored and reviewed. Please specify the date at which you will evaluate the impact, and where you will report the results of the review.

The impacts of this proposal will be evaluated on:	During March 2020 and submitted to Select
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