



## **Statement of Intent**

The Highland Council

21/09/2018

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### **Introduction**

[The Energy Company Obligation Flexible Eligibility](#) (hereafter referred to as ECO Flex) allows local authorities to tackle fuel poverty and householders vulnerable to the effects of living in cold homes by working with energy suppliers to access ECO funding. This programme will be focused on the West Highland area, in addition to areas covered by the HEEPS ABS programme. Where possible this scheme will aim to blend both ECO and HEEPS funding streams.

The Highland Council is committed to tackling fuel poverty which is prevalent across the Highlands due to the rural geography and lack of gas connection. The 2015 Scottish Housing Conditions Survey (2016) showed Highland fuel poverty levels to be at 56%, well above the Scottish average of 34%. This commitment to tackling fuel poverty is set out in the Local Housing Strategy and the Highland Outcome Improvement Plan.

Private tenure households are eligible for ECO Flex funding if they are:

- a) Fuel poor households, especially those that are not in receipt of ECO eligible benefits, or any other benefits.
- b) Low income households that are vulnerable to the effects of living in a cold home

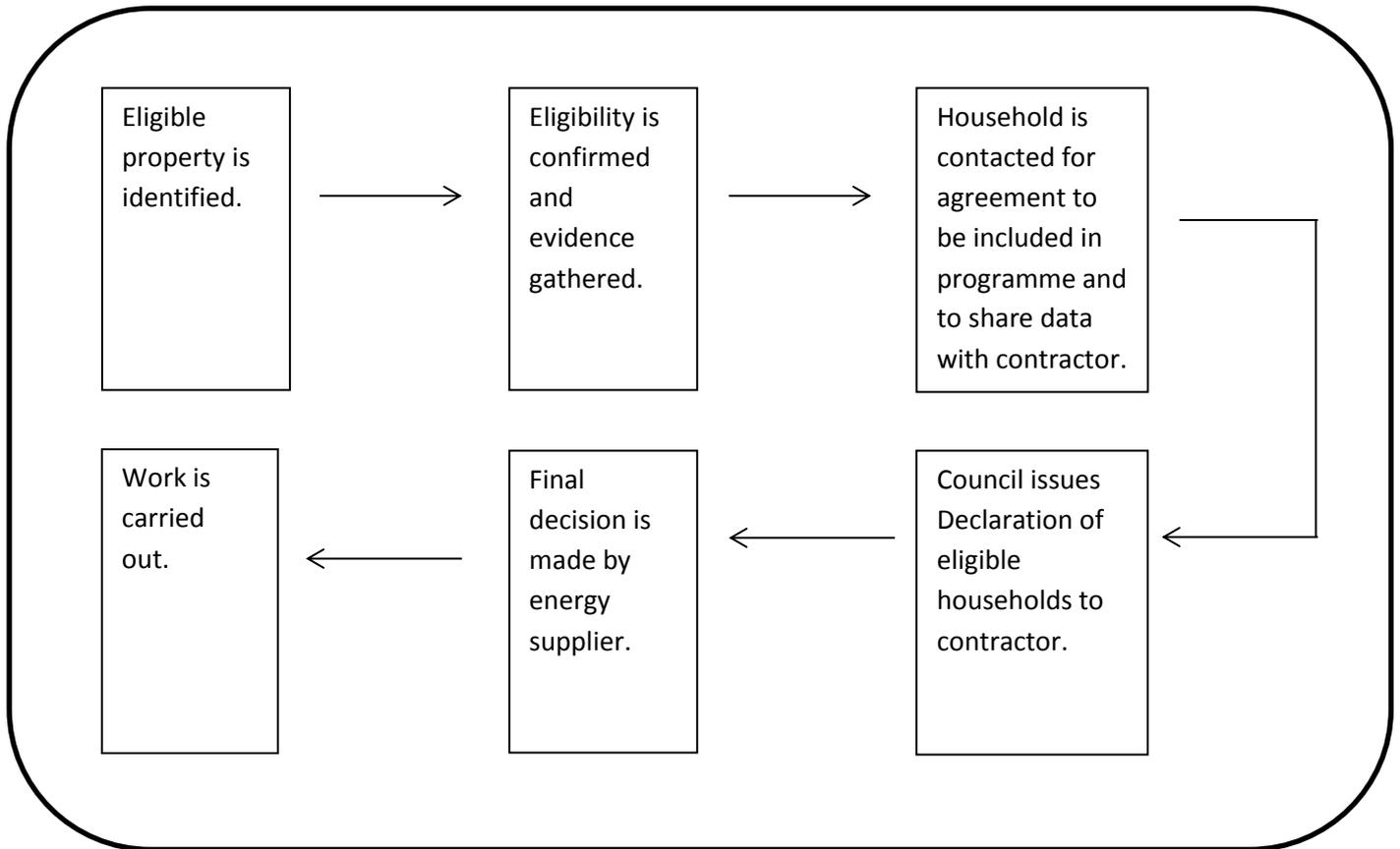
The Highland Council, in partnership with Home Energy Scotland, will contact households in this area who may be eligible for funding under ECO Flex. Referrals to this programme will also be taken through households contacting Home Energy Scotland or other referral partners directly.

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<sup>1</sup> This version has been withdrawn and is retained for information purposes only. Please visit [https://www.highland.gov.uk/info/1210/environment/829/energy\\_and\\_sustainability/6](https://www.highland.gov.uk/info/1210/environment/829/energy_and_sustainability/6) for the most up-to-date version

The Highland Council will work in partnership with Eon and/or their agents/contractors to deliver this programme. As such the final decision on whether a household receives an ECO measure rests with the supplier. **Meeting the above eligibility or being included in a Declaration issued by The Highland Council does not guarantee installation of measures.** Final decision is dependent on i) surveys carried out by Eon’s agent/contractors and installation costs calculated; ii) the energy savings that can be achieved for a property; and iii) whether Eon have achieved their targets or require further measures to meet their ECO targets.

The Highland Council ECO Flex Process



**Eligibility**

Flexible Eligibility allows The Highland Council to set its own criteria of identifying households that are fuel poor or living on a low income and vulnerable to the effects of living in a cold home. ECO Flex aims to tackle private tenure housing, which includes privately rented and owner occupied properties. Social housing is not eligible for ECO Flex; however The Highland Council will strive to include social housing (including council and housing association properties) under other funding streams where possible. The following criteria only apply to the ECO Flex programme.

1) Criteria for identifying households in fuel poverty

For the purposes of inclusion in ECO Flex, fuel poverty is defined as a household, which in order to maintain a healthy indoor environment, would be required to spend more than 10% of its income on household fuel.

In order to identify households living in fuel poverty indicators of high energy cost will be used, taken from the Highland Council's HERO Map and HEAT Database. Indicators will be weighted and include: no gas connection, EPC ratings of E, F and G, the age and type of property. Scoring these indicators will allow The Highland Council to identify properties to be targeted for work.

High energy indicators will be used initially to target households, however priority will be given to households on low income for inclusion in the programme. Low income will be defined here as the median household income, as defined by the Department of Work and Pensions. Information on household income will be gathered by referral partners (see section '*Referrals*' below).

2) *Criteria for identifying low income and vulnerable to cold*

Priority will be given to households who live on a low income. Householders on the following means-tested benefits will be considered as low income:

- Jobseekers' s Allowance (JSA)
- Employment and Support Allowance (ESA)
- Working Tax Credit (dependant on income thresholds)
- Child Tax Credit (dependant on income thresholds)
- Universal Credit (dependant on income thresholds)
- Disability Living Allowance (DLA)
- Personal Independence Payment (PIP)
- Attendance Allowance

Households not in receipt of benefits will be considered low income based on information on income supplied by the householder or referral partner (see section '*Referrals*' below). Income thresholds will be used to determine eligibility.

Householders with health conditions can become vulnerable to the effects of living in a cold home. People with the following health conditions may be particularly vulnerable to the cold, and therefore eligible for support:

- People with cardiovascular conditions
- People with respiratory conditions
- People with mental health conditions
- People who are terminally ill
- People with suppressed immune systems
- People with disabilities or long term illness

Other criteria for households vulnerable to cold can include properties where a member is:

- Over the age of 65
- Under the age of 5
- Pregnant
- In acute or long term debt

Properties which do not currently have a working central heating system will also be eligible. These households will be identified through referrals from partners (see section 'Referrals' below). Other households not meeting the above criteria may be considered on a case by case basis at the discretion of The Highland Council.

3) Any details of scheme requirements for SWI "in-fill" projects

ECO Flex aims to tackle private tenure housing, which the below criteria applies to. Social housing is not eligible as an "in-fill".

In order to encourage multi-property solid wall insulation projects, properties that do not meet the above criteria of being in fuel poverty or low income and vulnerable to cold, may be included in certain circumstances. These properties will be referred to as "in-fill".

In-fill is only allowed for solid wall insulation (SWI). These properties may be included when they are: in the same terrace; in the immediately adjacent building or; in the same building as households that meet the standard eligibility criteria.

A minimum percentage of households which meet the standard eligibility (fuel poor or low income and vulnerable to cold) must be included in SWI projects before in-fill can be considered, as shown in table below.

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

## **Governance**

The Highland Council or its referral partners will identify potential households using the above outlined eligibility criteria. These properties will be included in a local authority declaration signed by the Energy & Sustainability Manager at The Highland Council. With permission of the householders, the details of the property will then be passed to Eon and their agents/contractors. As specific information on eligibility criteria may be sensitive, these will not be passed on to the supplier and their agents, only that the household is eligible for work under the ECO Flex programme.

## **Referrals**

Referrals for ECO funding will be primarily from Home Energy Scotland, but may also be accepted from fuel poverty/vulnerability/social care or health organisations and internal departments, or any partnership with Eon and/or agents/contractors.

All referral information will be handled in accordance with Data Protection Act and retained for purposes of evidence, monitoring and reporting.

## **Evidence, monitoring and reporting**

Data will be collected to aid in the monitoring and evaluation of the programme. Evidence of the household eligibility will be gathered through The Highland Council databases or by referral partners. This will be held by The Highland Council alongside the number of households eligible for ECO Flex and will be stored following data protection and sharing policies.

Follow up questionnaires and feedback forms will be sent to households after the installation to monitor the impact on their ability to heat their home and householder health. Post-install inspections will be required in order to ensure satisfactory levels of quality of work. In some cases EPCs may be carried out by the supplier and/or their agents or contractors as part of the monitoring of the programme.

Information gathered by The Highland Council and referral partners will be shared with Eon and their agent/contractor only with the permission of the householder and in accordance with data protection and sharing policies. The number and type of measures installed will be recorded by Eon or their agent/contractor.

An annual report will be provided by The Highland Council to the Department of Business, Energy & Industrial Strategy in order to allow monitoring and evaluation of the ECO programme. This report will contain details of the number of installations, information on the methodology for identifying eligible households and evaluation outcomes.

Authorised by:

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The Highland Council