



West Lothian Council

ENERGY COMPANY OBLIGATION – FLEXIBLE ELIGIBILITY

STATEMENT OF INTENT

Local Authority	West Lothian Council
Date of Publication	31/10/2018
Publication on Website	31/10/2018
Version	S12000040/00001

1. Introduction

- 1.1. The department for Business, Energy and Industrial Strategy (BEIS) have set out an opportunity for Local Authorities (LA's) to engage with energy suppliers on how suppliers can meet their obligations to install energy efficiency measures in homes under the Energy Company Obligation (ECO) scheme. ECO is an obligation on energy suppliers aimed at helping households cut their energy bills and reduce carbon emissions by installing energy saving measures.
- 1.2. West Lothian Council is committed to tackling Fuel Poverty across the region through various means, as detailed in our Local Housing Strategy (LHS), Strategic Housing Investment Plan (SHIP) and Anti-Poverty Strategy. Adopting the Flexible ECO Eligibility Policy will allow Flexible ECO Affordable Warmth Funding for energy efficiency improvement measures to be made available to more residents living in private sector housing. This Statement of Intent will help to target those households in the highest level of need by targeting households living in fuel poverty or who are living on a low income and are vulnerable to the effects of a cold home. Flexible ECO is only available to support residents living in private sector housing.
- 1.3. A household is described as living in fuel poverty, in Scotland, if in order to maintain a satisfactory heating regime; it would be required to spend more than 10% of its income on all household fuel use. If over 20% of income is required, then this is termed as being in extreme fuel poverty.
- 1.4. This statement is not a guarantee that households will access ECO-Flex since this decision rests with the ECO provider(s). In addition to the discretion of the ECO providers all installations will be subject to appropriate surveys by the ECO providers or their agents to confirm that;
 - Properties are suitable for specified measures
 - Installation costs are within the ECO providers' criteria

- ECO providers have funding available
- 1.5. The level of funding made available by the ECO providers varies and there is no guaranteed minimum funding level. Ultimately West Lothian Council may only facilitate and support households. The final agreement and contract is between the house owner and the ECO provider or their agents.

2. West Lothian Council Area

- 2.1. West Lothian Council was established in 1996 and serves a community of over 175,000 citizens in Central Scotland, which is 3.2% of the Scottish population. There are almost 76,000 homes in West Lothian of which about 13,250 are owned by West Lothian Council; of these 76,000 homes there are approximately 22,000 (28%) households in fuel poverty across West Lothian and of those 5,320 (7%) are in extreme fuel poverty¹.

3. Identification of Eligible Households

- 3.1. This following section describes how the council defines the qualifying households for ECO-Flex. This is not a guarantee of funding being made available.

Private sector households will be considered eligible for Flexible ECO Affordable Warmth funding if they are;

- **At risk of living in fuel poverty (Route 1), or**
- **A low income household with at least one household member vulnerable to the effects of living in a cold home (Route 2)**

The council will consider eligibility in line with the Government’s policy and guidance published by the Department of Business, Energy & Industrial Strategy (BEIS), “Energy Company Obligation – Flexible Eligibility” published April 2017. It should be noted that eligibility does not guarantee funding.

3.2. Route 1 – At Risk of Living in Fuel Poverty

Fuel poor eligible households will be identified as those that have an income less than the Scottish mean of £23,150² and one of the following;

- Households living in a property with an Energy Performance Certificate (EPC) rating of E, F or G
- Score 5 or above in their responses to the following high cost questions:

Question	Response	Score
Does the home use a boiler?	Yes	0
	No	5
Was the home built before 1964?	Yes	20
	No	0
Was the home built before 1975 and of non-traditional construction (e.g. solid wall)?	Yes	20
	No	0
What is the main heating fuel?	Gas	-15
	Electricity	5
	Oil	10
	Solid Fuel	10

¹ SHCS Local Authority Analysis 2014-2016

² Scottish Government – Earnings in Scotland: 2017

3.3. Route 2 – A low income household with at least one household member vulnerable to the effects of living in a cold home

Fuel poor eligible households will be identified as;

- Having an income of less than the Scottish mean of £23,150 and
- Have one or more members;
 - With a limiting long term or terminal illness
 - With a mental illness
 - With a respiratory condition
 - With a disability
 - Who are 60 years or over
 - Who have dependent children of 18 years or younger

4. Details of scheme requirements for “in-fill” projects

- 4.1. The council can also facilitate Solid Wall insulation (SWI) schemes under flexible eligibility including households that are not in fuel poverty or vulnerable (“in-fill”).
- 4.2. We recognise the benefits of integrating ECO-Flex into planned Housing Improvement Programmes. In terms of SWI schemes in-fill criteria, the council intends to support energy efficiency improvement projects for vulnerable households in areas where solid wall insulation is technically feasible, permitted under planning legislation and can attract funding. This will be primarily, but not exclusively, areas identified by the council as forming part of its Home Energy Efficiency Programmes Area Based Schemes (HEEPS:ABS). Targeted areas for HEEPS programmes are in the lowest SIMD data zone areas which are a key source of data for determining a household’s risk of fuel poverty.
- 4.3. We will include the following criteria as determining eligibility for ECO-Flex funding;
 - Households are in the same street where HEEPS:ABS programmes are being undertaken
 - Homes are of the same build type as the council housing stock targeted to be included in HEEPS:ABS programmes to improve energy efficiency levels
 - They do not qualify for existing passport benefit limited schemes or would receive a lesser value of funding
 - They have one or more of the qualifying criteria as detailed in Route 2 (above)
 - Properties which have an EPC rating of E, F or G
- 4.4. Non-fuel poor households eligible for solid wall insulation in-fill must be one of the following;
 - In the same terrace as the household that does meet the criteria
 - In an immediately adjacent building to the household that does meet the criteria
 - Are in the same building as the household that does meet the criteria

In-fill eligibility must meet the minimum percentages set out below as per BEIS guidance:

Property Type	LA declaration requirements	In-fill available
Property consisting of a pair of semi-detached houses or bungalows containing no more than 2 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 properties 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) 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
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Exceptional cases not meeting the above criteria will be considered by a West Lothian Council Housing Investment Officer.

5. Acting on behalf of another Local Authority

5.1. West Lothian Council is not acting on behalf of another Local Authority to issue declarations of eligibility.

6. Joint Statement of Intent

6.1. West Lothian Council do not intend to issue a joint Statement of Intent with another Local Authority.

7. Governance

7.1. The ECO order states that LA’s must be consulted in the installation of a measure under flexible eligibility by suppliers.

7.2. In order to access Flexible ECO Eligibility funding the council is required to submit a LA Declaration to the ECO supplier. The final decision on whether a household received ECO measures is made by the energy suppliers and therefore inclusion in a declaration will not guarantee the installation of measures. The final decision will depend on:

- The survey carried out on the property
- The energy savings that can be achieved for a property
- There is adequate funding to support ECO funding for the installation of the energy efficiency measures
- Whether ECO obligated parties have achieved their targets to require further measures to meet their ECO targets

7.3. For HEEPS:ABS programmes, the council’s appointed contractor will be responsible for collating household data to determine if the householder meets the Flexible ECO Eligibility funding criteria. The installer will complete a LA Declaration for each householder and will state if eligibility has been met through;

- Living in Fuel Poverty
- Living on a low income and vulnerable to effects of a cold home
- Solid Wall “in-fill”

7.4. All declarations must be submitted by the council and signed by an approved Authorised Signatory. The Authorised Signatory responsible for signing and submitting declarations on behalf of the council will be the Head of Housing, Customer and Building Services and is based at; West Lothian Civic Centre, Howden South Road, Livingston, EH54 6FF.

8. Referrals

- 8.1. Referrals for Flexible ECO funding will be accepted from both Home Energy Scotland (HES) and via the council's own advocacy service The West Lothian Advice Shop.
- 8.2. The delivery of the HEEPS:ABS programme is managed by the council and all HEEPS:ABS enquiries are directed initially to the West Lothian Advice Shop, who maintain an active referral relationship with HES. Referrals for Flexible ECO funding will also be accepted from contractors appointed to deliver energy efficiency measures as part of the HEEPS:ABS programme.
West Lothian Advice Shop Telephone: 01506 283000
West Lothian Advice Shop Website: <https://www.westlothian.gov.uk/advice-shop>
Home Energy Scotland Telephone: 0800 808 2282
Home Energy Scotland Website: <https://www.energysavingtrust.org.uk/scotland/home-energy-scotland>
- 8.3. All referral information will be handled in accordance with the Data Protection Act and General Data Protection Regulations (GDPR) and retained for the purposes of evidence, monitoring and reporting.

9. Evaluation, Evidence and Reporting

- 9.1. To facilitate internal monitoring and reporting the council will be required to evidence records to support household eligibility and information received from suppliers or installers on measures installed.
- 9.2. The council's appointed contractors to deliver its HEEPS:ABS programme will be required to collate information on behalf of the council for monitoring, evaluation, evidence and reporting on a quarterly basis. An annual report will be submitted to BEIS detailing the success of the programme including:
 - Targeted households
 - Number of referrals
 - Referral routes
 - Eligibility criteria
 - Number of successful outcomes
 - Barriers
 - Energy efficiency measures supported

The information detailed in the report will assist BEIS to review the success of flexible eligibility, if it is achieving its objectives of targeting households living in fuel poverty or who are living on a low income and are vulnerable to the effects of living in a cold home.

10. Review

- 10.1. The scheme will be reviewed annually or at any point there is a significant change to the scheme or the funding available.
- 10.2. On the review of the scheme the council has the option to withdraw this statement where the scheme is no longer valid or provides no advantages to the communities of West Lothian.

11. Statement of Intent Authorisation

11.1. The Statement of Intent should be signed by the Chief Executive for the LA or other senior nominated officer at Director Level, on their behalf.

Signed: 

Name: Graham Hope

Position: Chief Executive

Date: 31 / 10 / 2018