

**Swindon Borough Council**  
**ECO Flexible Eligibility Statement of Intent**  
**Version 2 – 02 May 2018 to 20 October 2019**  
**Superseded by Version 3**

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**[https://www.swindon.gov.uk/info/20055/home\\_energy\\_efficiency/233/home\\_energy\\_conservation](https://www.swindon.gov.uk/info/20055/home_energy_efficiency/233/home_energy_conservation)**

## **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. Swindon Borough 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 (2015) for Swindon showed that 9% of households in the borough live in fuel poverty<sup>1</sup>. This equates to 8,335 homes: a figure that will only increase as fuel prices rise, which they are predicted to do over the coming years<sup>2</sup>.

1.3 Cold homes are 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 Swindon, there were 100 excess winter deaths between August 2014 and July 2015, a value of 19.5 on the excess winter deaths index (all persons).<sup>3</sup> This figure is lower than the South West and the National figures, but still requires some attention.

1.4 ECO Flexible Eligibility will contribute towards the aims of the Council's Affordable Warmth Strategy, which in turn links to the Swindon Borough Council Priorities One and Four and Outcome Two of the Joint Health and Wellbeing Strategy. There are also clear links with the Council's responsibilities under the Home Energy Conservation Act. This includes:

- Develop a referral mechanism for the Local Authority Flexible Eligibility route to the Energy Company Obligation (Affordable Warmth Strategy).
- Improve infrastructure and housing to support a growing, low-carbon economy (SBC Priority One).

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<sup>1</sup> Sub Regional Fuel Poverty data – BEIS (2017)

<sup>2</sup> BEIS (2016) Fossil Fuel Price Assumptions

<sup>3</sup> Excess Winter Mortality in England and Wales 2014/15 (Final) – Office for National Statistics

- Help people to help themselves while always protecting our most vulnerable children and adults (SBC Priority Four).
- Adults and older people in Swindon are living healthier and more independent lives (Health & Wellbeing Strategy Outcome Two).
- To enable all homes in Swindon to be adequately insulated and heated (Affordable Warmth Strategy).
- Reducing carbon emissions from the domestic sector.

1.5 Activity within Swindon has included the Safe & Warm programme, a 5 year area-based fuel poverty programme to help residents access schemes for home insulation, heating and income maximisation support along with advice and support for people at risk of falls or fires in the home. Some 17,000 households in total engaged with this scheme generating some 37,000 areas of action. Over £678,000 of insulation measures were installed, over £2.7 million in unclaimed benefit entitlement was identified, and £30,000 in funding for small falls prevention measures and a further 3,500 fire safety measures were provided. Safe & Warm ended in 2014.

Current work is focussed on the financial impact of high energy bills including Swindon Energy Matters a tariff comparison and switching service with additional support for low income and prepayment customers, and a programme of Warm Home Discount awareness and sign up events, along with work to implement the NICE guidelines on excess winter deaths and cold homes (in particular with the Great Western Hospital) and to improve partner engagement across Swindon.

1.6 From July 2017 Swindon Borough Council will be joining Wiltshire Council's Warm and Safe Wiltshire service to market ECO grants 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](http://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 confirm eligible households in fuel poverty as those that meet all of the criteria below:

- i) have an income defined in the table below
- ii) vulnerability and property efficiency

**i) Income**

The income thresholds are defined in the table below and match those for ECO Help to Heat.

Low income eligibility	0 children	1 child	2 children	3 children	4 or more children
One adult	£13,200	£17,400	£21,600	£25,800	£30,000
Two + adults	£19,800	£24,000	£28,200	£32,400	£36,600

**ii) Vulnerability and property efficiency**

Where an EPC is present a household will need an EPC rating of E or below to be eligible. This is aligned with the Government’s long term fuel poverty strategy to ensure no fuel poor household is band E or below by 2025.

BEIS published an analytical annex<sup>4</sup> to support its strategic framework for action on fuel poverty. The annex contains marginal abatement cost curves which examine the potential for measures to alleviate fuel poverty. Low-cost insulation measures make up some of the most cost-effective measures as well as upgrading heating systems in off-gas properties. Therefore the following determine eligibility:

- Any properties lacking cavity wall insulation; OR
- Under 60mm of loft insulation; OR
- Properties off the mains gas network; OR
- Any properties with mains gas have not had central heating at any time

For clarity, the following measures would be possible under this vulnerability and property efficiency criteria:

**Loft measures**

- The property has less than 60mm of loft insulation; OR
- The property is rated band E or below on the EPC and loft insulation is recommended

**Cavity wall measures**

- The property lacks cavity wall insulation; OR
- The property is rated band E or below on the EPC and cavity wall insulation is recommended.

<sup>4</sup>  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/211137/fuel\\_poverty\\_strategic\\_framework\\_analytical\\_annex.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/211137/fuel_poverty_strategic_framework_analytical_annex.pdf)

### Heating measures

- The property is off the mains gas network; OR
- The property has mains gas but has not had central heating at any time

### Any other measure recommended on the householders EPC

- The property is rated band E or below

2.5 The scheme will additionally target low income households with a health condition that's worsened by the cold.

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

2.8 For each project, in-fill 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	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

properties) or in the same terrace		terrace as the ones identified as fuel poor
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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. Acting on behalf of another local authority**

3.1 n/a

**4. Governance**

4.1 The Warm and Safe Wiltshire service is provided by Wiltshire Council in partnership with Swindon Borough Council, Dorset & Wiltshire Fire and Rescue Service and the Centre for Sustainable Energy.

4.2 The Declaration of households who meet the Council’s Flexible Eligibility criteria will be signed off by David Miles, Affordable Warmth Coordinator, or Alison Robinson, Home Energy Conservation Officer, both Swindon Borough Council.

**5. Marketing & Referrals**

5.1 Swindon Borough Council will identify eligible households through the Warm and Safe Wiltshire service. This may result from residents phoning or emailing the service following marketing or following a referral to the service from a frontline worker.

It will also cross-reference data on income with any data obtained on Energy Performance Certificates, prepayment meters, expenditure on fuel, housing type/age/condition, and heating type to identify suitable referrals.

Low income households living in energy inefficient housing will be identified in the private rented sector through enforcement activity under the Housing Act 2004.

The UNO database of privately owned housing stock can be used to identify areas which could benefit.

The Council will also receive referrals through the Dorset and Wiltshire Fire Service through their Safe and Independent Living (SAIL) initiative.

5.2 Along with the activities suggested in 5.1, the Council will look at cost effective ways to raise awareness and generate referrals through engagement with other Council services.

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

- Work closely with the Great Western Hospital to identify routes to vulnerable households through engagement on the NICE guidelines around excess winter deaths and cold homes.
- Look at other health sector related opportunities 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, Age UK, Citizens' Advice and other third sector organisations.
- Target homes where income, property and health data indicate the householders may be eligible.

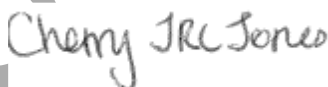
## 6. Evidence, monitoring and reporting

6.1 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.

6.2 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.

6.3 Each eligible household will be asked to complete a short questionnaire examining their circumstance and 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.

## 7. Statement of Intent authorisation



Signed by:

Date: 02 May 2018

**[Cherry Jones]**  
**Director of Public Health**  
**Swindon Borough Council**