

ECO Flexible Eligibility: Liverpool City Region Joint Statement of Intent

This joint Statement of Intent covers the following Liverpool City Region Authorities whose full addresses can be found in Annex A:

Halton Borough Council (E06000006)
Knowsley Metropolitan Borough Council (E08000011)
Liverpool City Council (E08000012)
Sefton Metropolitan Borough Council (E08000014)
St Helens Metropolitan Borough Council (E08000013)
Wirral Metropolitan Borough Council (E08000015)

Sefton Version LCR Sol 2.0.2019

This document is the Sefton Council version of the Liverpool City Region Statement of Intent (Sol) and whilst information on other Liverpool City Region local authorities is provided, the information should only be seen as a general guide. Reference should be sought from each Authority's most recent Sol on their websites. Also, please note, each will apply a separate numbering process and version update.

- 1) Date of publication: 11th July 2019
- 2) Published location for this and previous versions:
<https://www.sefton.gov.uk/environmental-protection/energy-and-environment/energy-efficiency-at-home/energy-company-obligation-flexible-eligibility.aspx>

1. Liverpool City Region Joint Statement of Intent

The Liverpool City Region (LCR) Local Authorities named above welcome the extension of ECO Flexible Eligibility into ECO3. With this joint Statement of Intent the LCR Local Authorities named above wish to express their commitment to improving the energy efficiency of their residential properties within the LCR and thereby reduce fuel poverty. Energy efficiency improvements will be delivered in the most cost effective way possible and maximise efficiency savings through a combined approach utilising the procured LCR ECO Framework where feasible. Details of the Framework (or alternative arrangements) will be maintained on the same webpage where this statement resides. Although this is a joint Statement of Intent, no Local Authority listed above may make a Local Authority Declaration (LAD) on behalf of another.

An individual household which falls under a LAD is not guaranteed to receive installed measures as a final decision will depend on:

- I. the resident meeting the criteria stipulated in this statement;
- II. the level of funding that can be offered dependant on the lifetime scores that can be achieved, the cost of the improvement measure which relates to their property, the current heating systems and its state of repair;
- III. energy suppliers' obligation levels;
- IV. the technical capacity of the property and presence or absence of barriers which may impede physical delivery;
- V. the ability of the LCR to secure a delivery partner/s;
- VI. the ability of the: deed holder or council securing any match/ gap funding required.

2. How the LA intends to identify eligible households

We do not intend to target those on benefits for flexible eligibility as these households are captured under the ECO Help to Heat.

The LCR Local Authorities intend to identify households in the following ways:

1. Identifying households that are living in fuel poverty (FP) or living on a low income and vulnerable to the effects of living in a cold home (LIVC); and
2. Those that would be Solid Wall Insulation (SWI) 'infill' as identified under the Government guidance and those identified to us from our existing energy delivery partner/s or local Registered Providers of social housing.

The local authorities have defined, "low income" for the purposes of identifying households in point 1 above should be determined by the Minimum Income Standard (MIS) developed by the Joseph Rowntree Foundation (www.minimumincome.org.uk) but reserve the right to amend the child age breakdown element for operational purposes. The decision and reasoning to use the MIS and for not adopting table 1 in Annex 6 of the government guidance are as follows:

1. After analysis of the possible incomes of households in receipt of Help to Heat welfare benefits, excluding DLA, these households could all earn significantly more than those in table 1, Annex 6. Qualification would therefore be through Help to Heat, potentially leaving LA Flex redundant;
2. The use of the Minimum Income Standard is becoming more widespread amongst government bodies and organisations for determining low income; and

3. It is regularly updated to reflect changing living costs.
4. Unlike Help to Heat criteria, residents need an additional qualifying criterion (vulnerable to the cold or high heating costs) other than income. Therefore, the higher income levels are justified to reflect the further needs.

2.1. Criteria for identifying fuel poverty

To reduce the administrative burden on LA officers and to enable every contact to count, as per the NICE guidelines NG6 '[Excess winter deaths and illness and the health risks associated with cold homes](#)'. We intend to identify those who are in fuel poverty to be:

1. Living in a property which has an Energy Performance Certificate (EPC) Band D or below, in accordance with the Government's Fuel Poverty Strategy target; and
2. Living on an income below the Minimum Income Standard.

The EPC estimates the cost of heating the property over three years which can be used in the verification of point 2 above.

If no EPC is available for the property then a similar adjacent property's EPC may be used or alternatively the LA reserves the right to use appropriate and approved proxy software packages that can offer a suitable indicative EPC Band. The LA may also in limited circumstances identify households that;

- i. are required to spend 10%¹ or more of their disposable income (after rent or mortgage payment is considered and excluding income payments for disability related needs) on fuel to maintain an adequate level of heating². [i.e. meet the 10% model for defining fuel poverty] Or
- ii. meet the Government's Low Income High Cost model for defining fuel poverty³

2.2. Criteria for identifying low income and vulnerability to cold

To reduce the administrative burden on LA officers and to enable every contact to count, as per the NICE guidelines NG6, we intend to identify those who are deemed as LIVC to be:

Low Income:

- Living on an income below the Minimum Income Standard,

¹ In line with other UK government administered schemes.

² An adequate level of heating is described as 21°C for 16 hours a day in a living room and no less than 18°C for all other rooms (World Health Organisation).

³ As defined by the Hills Fuel Poverty Review, "Getting the measure of fuel poverty"
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/48297/4662-getting-measure-fuel-pov-final-hills-rpt.pdf

- and;

Vulnerable to Cold:

Having one or more of the following vulnerabilities:

- a. Those identified in Nice Guidelines NG6 as “Groups at greater risk of harm from cold weather”:
 - people with cardiovascular conditions;
 - people with respiratory conditions;
 - people with disabilities;
 - people with mental health conditions or learning difficulties that reduces individual’s ability to self-care (including dementia);
 - older people (65 and older);
 - households with young children (from new-born to school age);
 - pregnant women;
- b. People with pre-existing chronic medical conditions such as, but not limited to: diabetes, stroke, suppressed immune system, terminally ill;
- c. People who are housebound or otherwise low mobility;
- d. Families with school age children;
- e. People assessed as being at risk of, or having had, recurrent falls.

Where oversubscribed we reserve the right to prioritise those we determine to be at greatest risk as; households that are in Council Tax Band A-D, containing one or more of the following:

- Vulnerable to cold in **b** and **c** in section 2.2 above;
- Children under 5;
- Older people 85 and over;
- Pregnant women; or
- Terminally ill.

2.3. Identification of area based schemes and scheme requirements for SWI “in-fill” projects

The LCR Local Authorities intend to support area based schemes through Local Authority Declarations (LADs) in order for “whole place” schemes to be realised. We believe that this is an effective solution to inclusion, regeneration of whole areas, improved community cohesion and subsequent benefits from an improvement in cohesion.

Area based schemes will be determined according to each local authority and or Registered Provider of social housing depending on the housing stock management within each authority and the needs of the residents. The following is a list of the targeting components which may be used to identify area based scheme locations that will be subject to LADs:

- Lower Super Output Area (LSOA);
- RdSAP ≤ D;

- Tower blocks, whole estates, streets by street projects;
- Indices of Multiple Deprivation (IMD) statistics;
- Areas of regeneration; and
- Any regeneration approved grant initiative such as those from Homes England or the European Regional Development Fund (ERDF) / European Structural and Investment Fund (ESIF).

We would look to offer LADs to the following prescribed areas as these have already been identified as areas of regeneration and the targeting components used to determine these LADs is given with each scheme listed below:

- Any Scheme mentioned in the ESIF bid led by the Viridis Partnership and administered by Sefton Council.

Although this is a combined Statement of Intent the logical administrative actions of evaluating and signing the LADs would be undertaken by each Local Authority.

2.4. Issuing of LADs for schemes that prescribe Statement of Intent declarations as eligibility criteria for none ECO flexibility schemes

Sefton Council will permit the Responsible Officer to issue LADs to other fuel poverty or energy efficiency schemes, where Sefton residents are eligible under this Statement of Intent and can improve their heating, insulation or electrical efficiency, reduce CO₂ emissions or save on utility bills. These LADs will be separately identified in the Council system for storing declarations.

3. Governance

Although this is a combined Sol the logical administrative actions of evaluating and signing of the LADs would be undertaken by each local authority. No LA named in this Sol is permitted to act on behalf of another.

The posts of the Responsible Officer (RO) for signing “Local Authority Declarations” on behalf of the local authorities can be found below and each LA address can be found in Annex A:

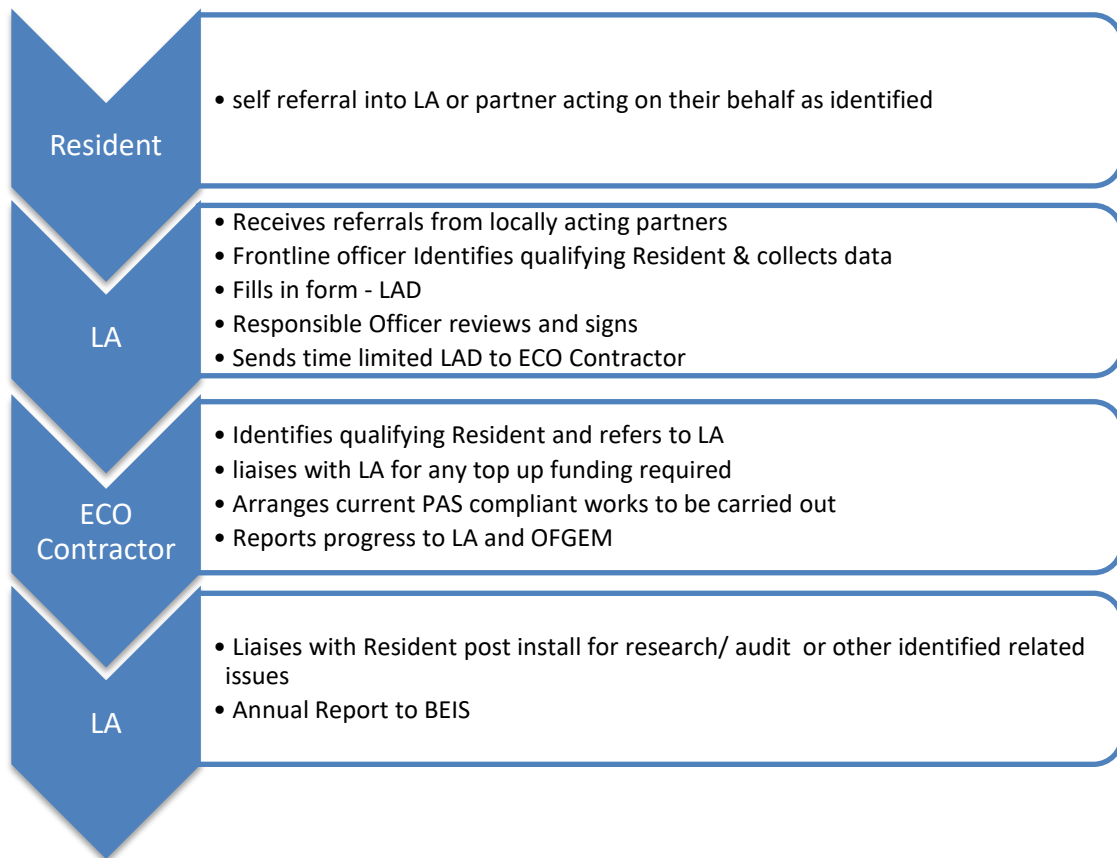
- I. **Liverpool City Council:**
Principle housing officers, Head of Housing Strategy, Head of the Healthy Homes Programme Home Improvement Agency
- II. **Sefton Council Metropolitan Borough Council:**
Appointed HECA contacts as declared on Sefton’s Reporting webpage for this Statement of Intent.
- III. **Wirral Metropolitan Borough Council:**
Principal Housing and Investment Officers, Housing and Investment Manager, Housing Services Senior Manager, Head of Operational Housing Services.

- IV. **St Helens Metropolitan Borough Council:** St.Helens Council's Affordable Warmth Unit Representative
- V. **Knowsley Metropolitan Borough Council:** Energy Efficiency Officer, Strategic Housing Partnership Manager and Group Manager Strategic Housing
- VI. **Halton Borough Council:** Public Health Division 1st Floor Runcorn Town Hall.

3.1. Governance structures

The structure given below, is an outline of the process across the Local Authorities. Specific referral routes are given in section 4 below by each Local Authority.

Individuals



Area-based

Local Authority housing officers, in conjunction with Registered Providers (RPs) where applicable, will determine geographic areas which are in need of energy efficiency improvements.

A schematic and address list will be provided along with which properties can be included as infill and which will require a LAD in order to present an offer of a whole place scheme.

The RO will sign the LAD and provide a copy to the requesting officer and this will be sent to the ECO Framework or Approved Contractor.

4. Referrals

Data sharing in accordance with the Data Protection Act (and will be updated in line with the General Data Protection Regulation) will be by consent and the Approved Contractor becomes a data controller when client details are passed to it. Any obligated supplier working on behalf of the LCR Local Authorities would be expected to report quarterly on:

- I.** Number of LADs unused and the reasoning for this;
- II.** Costing of works, ECO Level of funding, any top-up funding and source of;
- III.** Average timescales from receiving LAD to work completion;
- IV.** CO₂ Savings;
- V.** Other mutually agreed criteria.

The LA reserve the right to randomly select properties that LADs have been issued to, to receive follow up; this is in order to audit the data received by the installer is correct and that the information contained within the original LAD was correct at the time of writing by an independent officer to deter, prevent and detect fraud.

In order to administer this scheme, the Local Authorities named within this document will collate evidence in accordance with the scheme including the following where appropriate:

- a.** Income data;
- b.** SAP Band;
- c.** Estimated annual fuel costs;
- d.** Vulnerability; and
- e.** Equalities monitoring data.

4.1 Referral Routes

Residents and organisations who believe they know a household who may qualify are directed to contact their own Local Authority provider to self-refer to this scheme. Information about who to contact for each Local Authority is given below:

I. Halton Borough Council:

Halton Direct Link and the Contact Centre will act as the central point of contact for referrals. The Council will accept referrals from individuals or organisations, such as Energy Projects Plus, acting on behalf of individuals.

Halton Direct Link Offices are based in Widnes Town Centre and Halton Lea. The Contact Centre can be contacted on

Phone: 0303 333 4300

II. Knowsley Metropolitan Borough Council:

All referrals will be directed through Knowsley's Energy Officer

Phone: 0151 443 5817

Email: simon.rugen@knowsley.gov.uk

III. Liverpool Referrals:

Liverpool's Healthy Homes Home Improvement Agency will act as a central hub for a referrals route from fuel poverty/vulnerability/social care or health organisations, or any partnership with a selected obligated supplier across the City.

Freephone: 0800 012 1754

Email: www.healthyhomesprogramme@liverpool.gov.uk

IV. Sefton Metropolitan Borough Council:

All applications for LADs will be coordinated through the affordable warmth service at Sefton Council. The council will accept referrals from individuals or advocates, such as Energy Projects Plus, on behalf of individuals.

Phone: 0151 934 2222

V. St Helens Metropolitan Borough Council:

All applications for LADs will be coordinated through the affordable warmth service at St.Helens Council. The council will accept referrals from individuals or advocates on behalf of individuals.

Phone: 01744 676555

Email: homeimprovementagency@sthelens.gov.uk

VI. Wirral Metropolitan Borough Council:

Activity and referrals will be prioritised in Wirral's Selective Licensing areas and will come through the Healthy Homes Service. The Council will also accept referrals for eligible households outside of the Selective Licensing areas from individuals and advocates working for Community and Voluntary Sector organisations and from the Council's contractor under the Fuel Poverty & Energy Efficiency Programme.

Phone: 0151 691 8114

Signature

The Sol should be signed by the Chief Executive Officer for the local authority or other senior officer nominated on their behalf who is at least at Director Level.

Signed on Behalf of **Sefton Metropolitan Borough Council**

Stephan VanAndersen

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Position:
Head of Corporate Resources

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Date: 9th July 2019

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ANNEX A

Halton

Public Health Division
1st Floor Runcorn Town Hall
Heath Road
WA7 5TN

Knowsley Council

Strategic Housing
1st Floor the Yorkon Building
Archway Road
Huyton
Knowsley
L36 9FB

Liverpool City Council

Healthy Homes HIA Team
Cunard Building
Water Street
Liverpool
L3 1DS

Sefton Council

Affordable Warmth Service
2nd floor, Magdalen House
30 Trinity Road
Bootle, Merseyside
L20 3NJ

St.Helens Council

People's Services - Private Housing Initiatives
Town Hall
Victoria Square
St.Helens
WA10 1HP

Wirral Council

Housing and Investment Team
PO Box 290
Brighton Street
Wallasey
CH27 9FQ