



RHONDDA CYNON TAF

COFNOD O BENDERFYNIAD WEDI'I DDIRPRWYO GAN SWYDDOG
RECORD OF DELEGATED OFFICER DECISION

Penderfyniad Allweddol | Key Decision ✓

PWNC | SUBJECT:

Energy Company Obligation (Eco) 3 – Local Authority Flexible Eligibility Criteria 'Eco Flex'

DIBEN YR ADRODDIAD | PURPOSE OF THE REPORT:

In accordance with the Council's Scheme of Delegation, this report has been prepared to accompany the intended officer decision of the Director of Development and Prosperity as described below:

This report sets out Rhondda Cynon Taf's proposal to enable delivery of the ECO flexible eligibility scheme, by setting its own local eligibility criteria and publishing a Statement of Intent (Sol) to allow residents to access funding under the Energy Company Obligation (ECO) 3: Flexible Eligibility 'ECO Flex'. The ECO 3 period runs between October 2018 – March 2022.

PENDERFYNIAD WEDI'I DDIRPRWYO | DELEGATED DECISION:

It is agreed that:

Approval is given to proceed with a flexible eligibility scheme based upon eligibility criteria as outlined in this report: and the Statement of Intent (Sol) is published on the Authority's website.

Llofnod y Prif Swyddog
Chief Officer Signature

Simon Gale .

Enw (priflythrennau)
Name (Print Name)

24.06.19.

Dyddiad
Date

Mae'r penderfyniad yn cael ei wneud yn unol ag Adran 15 o Ddeddf Llywodraeth Leol 2000 (Swyddogaethau'r Corff Gweithredol) ac yn y cylch gorchwyl sy wedi'i nodi yn Adran 5 o Ran 3 o Gyfansoddiad y Cyngor.

The decision is taken in accordance with Section 15 of the Local Government Act, 2000 (Executive Functions) and in the terms set out in Section 5 of Part 3 of the Council's Constitution.

YMGYNGHORI | CONSULTATION



24/06/19

LLOFNOD YR AELOD YMGYNGHOROL O'R CABINET
CONSULTEE CABINET MEMBER SIGNATURE

DYDDIAD | DATE

LLOFNOD SWYDDOG YMGYNGHOROL
CONSULTEE OFFICER SIGNATURE

DYDDIAD | DATE

RHEOLAU'R WEITHDREFN GALW-I-MEWN | CALL IN PROCEDURE RULES.

A YW'R PENDERFYNIAD YN UN BRYD A HEB FOD YN DESTUN PROSES GALW-I-MEWN
GAN Y PWYLLGOR TROSOLWG A CHRAFFU?:
IS THE DECISION DEEMED URGENT AND NOT SUBJECT TO CALL-IN BY THE OVERVIEW
AND SCRUTINY COMMITTEE:

NAC YDY | NO ✓

Rheswm dros fod yn fater brys | Reason for Urgency:

*Os yw'n cael ei ystyried yn fater brys - llofnod y Maer/Dirprwy Faer/Pennaeth y Gwasanaeth
Cyflogedig yn cadarnhau cytundeb fod y penderfyniad arfaethedig yn rhesymol yn yr holl
amgylchiadau iddo gael ei drin fel mater brys, yn unol â rheol gweithdrefn trosolwg a chraffu
17.2:*

*If deemed urgent - signature of Mayor or Deputy Mayor or Head of Paid Service confirming
agreement that the proposed decision is reasonable in all the circumstances for it being treated as
a matter of urgency, in accordance with the overview and scrutiny procedure rule 17.2:*

.....
(Maer | Mayor)

.....
(Dyddiad | Date)

DS - Os yw hwn yn benderfyniad sy'n cael ei ail-ystyried yna does dim modd galw'r
penderfyniad i mewn a bydd y penderfyniad yn dod i rym o'r dyddiad mae'r penderfyniad
wedi'i lofnodi.

NB - If this is a reconsidered decision then the decision Cannot be Called In and the decision will
take effect from the date the decision is signed.

AT DDEFNYDD Y SWYDDFA YN UNIG | FOR OFFICE USE ONLY

DYDDIADAU CYHOEDDI A GWEITHREDU | PUBLICATION & IMPLEMENTATION DATES

CYHOEDDI | PUBLICATION

Cyhoeddi ar Wefan y Cyngor | Publication on the Councils Website:- 24th June 2019

DYDDIAD | DATE

GWEITHREDU'R PENDERFYNIAD | IMPLEMENTATION OF THE DECISION

Nodwch: Fydd y penderfyniad hwn ddim yn dod i rym nac yn cael ei weithredu'n llawn nes cyn pen 3 diwrnod gwaith ar ôl ei gyhoeddi. Nod hyn yw ei alluogi i gael ei "Alw i Mewn" yn unol â Rheol 17.1, Rheolau Gweithdrefn Trosolwg a Chraffu.

Note: This decision will not come into force and may not be implemented until the expiry of 3 clear working days after its publication to enable it to be the subject to the Call-In Procedure in Rule 17.1 of the Overview and Scrutiny Procedure Rules.

Yn amodol ar y drefn "Galw i Mewn", caiff y penderfyniad ei roi ar waith ar / Subject to Call In the implementation date will be

28th June 2019
DYDDIAD / DATE

WEDI'I GYMERADWYO I'W GYHOEDDI: ✓ | APPROVED FOR PUBLICATION : ✓

Rhagor o wybodaeth | Further Information:

Cyfadran Directorate:	Prosperity and Development
Enw'r Person Cyswllt Contact Name:	Derek James
Swydd Designation:	Service Director of Prosperity and Development
Rhif Ffôn Telephone Number:	01443 281115

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

KEY DELEGATED DECISION

A REPORT TO ACCOMPANY A DECISION OF THE DIRECTOR OF PROSPERITY AND DEVELOPMENT

JUNE 2019

ENERGY COMPANY OBLIGATION (ECO) 3 – LOCAL AUTHORITY FLEXIBLE ELIGIBILITY CRITERIA ‘ECO Flex’

AUTHOR: DEREK JAMES, SERVICE DIRECTOR OF PROSPERITY & DEVELOPMENT

1.0 PURPOSE OF THE REPORT

- 1.1 The report provides details on the Energy Company Obligation (ECO) Local Authority Flexible Eligibility Scheme (Scheme).
- 1.2 The purpose of the report is to seek approval to proceed with the Scheme and to publish a Statement of Intent (Sol), see attached in Appendix A which sets out a locally based and evidenced eligibility criteria to allow residents to access ECO Flex funding via energy companies and/or installers.
- 1.3 The Scheme, if approved, will assist the delivery of fuel poverty/affordable warmth objectives while also providing funding towards other capital funded schemes that are currently live in RCT such as Arbed am Byth, funded by Welsh Government.

2.0 RECOMMENDATIONS

It is recommended that:

- 2.1 Approval is given to proceed with a flexible eligibility scheme based upon eligibility criteria as outlined in this report: and
- 2.2 The Statement of Intent (Sol) is published on the Authority's website.

3.0 REASON FOR RECOMMENDATIONS

- 3.1 External funding for the majority of fuel poverty/energy efficiency schemes are targeted to those in receipt of means tested benefit. Although these are households that require assistance, there is a growing number of homes who are in fuel poverty due to low incomes (working poor) but because their incomes are just above the means test they are unable to access other available sources of grant assistance.

- 3.2 The Scheme provides an alternative option to those that are just as likely to be in fuel poverty due to low incomes and/or have illnesses that are exacerbated by living in cold homes, but do not qualify for other assistance such as NEST (Welsh Government Scheme).
- 3.3 The Scheme helps deliver locally based actions to mitigate the impacts of fuel poverty and help households achieve affordable warmth. It also contributes to the delivery of the Council's Corporate Plan, while safeguarding future generations to the impact of climate change through reducing carbon emissions in RCT.

4.0 BACKGROUND

- 4.1 The ECO, first introduced in 2013, is an energy efficiency scheme for Great Britain that places legal obligations on larger energy suppliers to deliver funded or part funded energy efficiency measures to domestic premises. The current ECO period known as 'ECO 3' is running between October 2018 – March 2022.
- 4.2 ECO 'Help to Heat' funding is part of a carbon reduction programme that is aimed at households that are likely to be affected by or at risk of fuel poverty. The main causes of fuel poverty are low incomes, poor energy performance of homes and those living with health conditions that are exasperated by living in cold homes.
- 4.3 'ECO Flex' is a discretionary part of the overall Help to Heat ECO Scheme which allows local authorities to have 'flexible eligibility' to voluntarily have the discretion to set their own local eligibility criteria (in line with Energy Company Obligation: ECO3, 2018 – 22 Flexible Eligibility Guidance (Guidance)) thereby allowing residents who meet the published criteria to access this part of the funding. The criteria must be published online in a (Sol).
- 4.4 A (Sol) is a public statement of the criteria that the Authority intends to use to identify households that meet eligibility criteria under ECO Flex. The (Sol) must include a description of how the Authority intends to identify households in its area that may benefit from the installation of energy efficiency measures that are (a) on low income and are faced with high energy costs in keeping warm; or (b) on a low income and are vulnerable to the effects of living in a cold home.
- 4.5 The total value of the flexible eligibility element of ECO is estimated at £560m over the delivery period. Without a (Sol) residents will not be able to access this funding but could still access other parts of ECO if they meet the relevant criteria. However, the relevant criteria for the other funding is primarily aimed at households in receipt of means tested benefits, similar to Welsh Government's NEST Scheme, but not all fuel poor homes are in receipt of means tested benefits, as many are working but in receipt of low incomes. Therefore, ECO Flex provides the potential to assist households who are at risk of living in fuel poverty due to low incomes or are vulnerable to cold but who

may not necessarily be in receipt of means tested benefits, providing a local criteria based upon local needs.

5.0 ELIGIBILITY CRITERIA FOR ECO FLEX

- 5.1 To participate in the scheme, a Local Authority must set its own eligibility criteria in accordance with the Guidance and publish this information online in a (Sol). A (Sol) can be amended or withdrawn at any time with no notice period required. The local criteria proposed for RCTCBC is as follows;

Household Income Threshold

- 5.2 Households with a total income under £30,576 (after housing costs such as rent or mortgage). This figure has been derived from ONS data which shows that this is the average household income for RCT. Although this figure is high in relation to the Guidance it also means that the scheme can potentially assist any household with a lower than average income, based upon locally evidenced need.
- 5.3 To ensure that households most at risk of the effects of fuel poverty are targeted first (as per the Scheme Guidance and because ECO Flex funding can cease at any time once national carbon targets are met) applications will be prioritised based upon the bandings as shown in 5.11, which includes lower income households. Within these bandings applications will be processed in date order of completed full applications. The scheme will be available to owner occupiers and private rented households throughout the whole borough but actively targeted to areas identified from the FRESH (Foundation data for Robust Energy Strategies) developed by Warm Wales, which brings together low income deprived areas, lower energy performance of homes and also health data from a range of sources, highlighting areas most at risk. In addition to this, installers also undertake their own data analysis to identify cluster areas to target and they will also be actively marketing the scheme to help them spend their funding.
- 5.4 All households meeting the above criteria must then also meet one of the following categories;

High Heating Costs

- 5.5 For homes to meet this eligibility criterion they must be considered to have high housing costs due to the poor energy performance of their home. To determine this, properties must either be rated E, F or G on the Energy Performance Certificate (EPC), or where no certificate exists they must meet the high housing costs assessment as detailed within the (Sol), which uses scoring factors to determine whether the property is likely to be less energy efficient.
- 5.6 Either

Vulnerability to Cold

- 5.7 Households are considered to be vulnerable to the effects of living in a cold home if they are living with circumstances and/or health conditions that make them more at risk of excess winter deaths and/or cold related illnesses as reflected within the National Institute for Health and Excellence (NICE) guidance 2015.

Tenure

- 5.8 In accordance with the Guidance, ECO Flex is only available for privately owned properties (Owner-occupiers and private rented homes) and not social rented homes.
- 5.9 Private Rented Sector Homes are included but restrictions apply to only allow properties that are E rated on the EPC. Properties that are F or G (or unrated) can only receive renewables or solid wall insulation. No replacement or repair of a broken heating system will be allowed to any PRS properties. This is due to Energy Efficiency (Private Rented Property) (England & Wales) Regulations 2015 whereby landlords themselves are required to make improvements to properties that are F or G rated by sourcing third party funding assistance.

Priority Applications

- 5.10 To ensure that the scheme continues to assist households who are most at risk of fuel poverty a priority banding assessment will be undertaken to process applications from those in most need first.
- 5.11 Applicants will be prioritised as follows;

High Priority	Medium Priority	Low Priority
Household income under £20k	Household income £20,001 - £24,999	Household income £25,000 - £30,576
Households that are G (EPC) Rated	N/A	N/A
Terminal Illness/Palliative Care or households with cardiovascular or respiratory illnesses	Multiple health conditions (health conditions as listed in NICE guidelines of cold related illnesses)	Single health condition (health conditions as listed in NICE guidelines of cold related illnesses)
Household member in hospital awaiting discharge and vulnerable to the effects of living in a cold home (as per NICE health condition guidelines)	N/A	N/A

- 5.12 The overall priority will be awarded based upon the highest level of priority from either of the two categories as shown above (do not need to score in both categories).
- 5.13 Example 1 - a household member with a terminal illness and the household income is £26,000 will be awarded a high priority for health under the LVC category, even though they score a low priority based upon income alone.
- 5.14 Example 2 – a household member with no health conditions and a household income of £18,000 will be awarded a high priority based upon their income levels under the FP category.
- 5.15 Example 3 – a household member with a cold related illness in hospital awaiting a safe discharge with one health condition and a total household income of £29,000 – awarded a high priority due to allow safe and timely hospital discharge.

In-Fill Applications

- 5.16 Households that do not meet the eligibility criteria can be included under an 'In-Fill' category. To qualify the properties must be private tenure and need to be 'directly adjoined' to the qualifying home. The infill criteria will only apply to the installation of solid wall insulation and at least 50% of the properties must meet the eligibility criteria for the other non-qualifying households to be included as infill. The number of infill properties must not exceed 50% of the total number of properties being included in each particular cluster, for example if 6 properties are adjoined at least 3 would need to meet the eligibility criteria and the remaining 3 will be considered as 'in-fill'.

6.0 EQUALITY AND DIVERSITY IMPLICATIONS

- 6.1 An Equality Impact Assessment (EqIA) screening form has been prepared for the purpose of this report. It has been found that a full report is not required at this time.

7.0 CONSULTATION

- 7.1 There are no formal consultation requirements arising from these proposals.

8.0 FINANCIAL IMPLICATION(S)

- 8.1 The Council's role is to enable the delivery of the scheme and approve applications and provide the necessary declarations to installers/agents/energy companies. Once applications are approved, the contractual relationship is between the applicant and the installer. The energy company installer or agent will access funding on behalf of the application. Therefore, the Council has no financial obligations in respect of this scheme.

- 8.2 However, the Council is intending to pilot a heating grant utilising existing resources from within the capital grants programme. The Council grant will operate independently of this ECO Flex Scheme but has the potential to be utilised in conjunction with ECO funding to contribute to any shortfall of costs for heating measures for eligible households. ECO funding will always be sourced in the first instance.
- 8.3 There is a staff resource implication of administering the Scheme. However, within the existing Housing Strategy Team there is a Housing Energy Officer and a Housing Strategy Officer (circa 1.4 FTE) who will be responsible for the operational delivery of the scheme, therefore the scheme can be administered using existing staff resources.
- 8.4 There is a potential for the Council to acquire a referral fee from delivery partners and this will be established on the condition that it does not hinder the affordability and successful installation of energy measures to residents. The success of the scheme is determined by the overall deliverability of the scheme in realising the Council's objectives. The scheme will commence with no referral fees to be paid to the Council which will help establish engagement of partners and to test the market for funding rates and availability of energy measures. Once the scheme is up and running it is intended to seek referral fees on the condition that the scheme remains deliverable and does not hinder funding offers coming forward. The Scheme will be under continual review to ensure that it remains relevant but also to determine suitability of seeking referral fees but wherever possible fees will be obtained.
- 8.5 Any income generated for the Council would be recycled into the 'Energy pot' to either allow for additional resources as required as the scheme grows, and/or to fund marketing activities to allow as many residents as possible to access the scheme. Any residual monies will be used to assist with delivery of other actions related to Affordable Warmth and Fuel Poverty.

9.0 LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED

- 9.1 There are no legal implications to be considered at this time.
- 9.2 Operational delivery of the scheme will be in accordance with the necessary ECO legislation and published scheme guidance for Flexible Eligibility. Compliance will be reviewed by Officers within the Housing Strategy Team, who will provide all necessary reporting to Ofgem and/or Department of Business, Energy & Industrial Strategy.

10.0 LINKS TO THE CORPORATE AND NATIONAL PRIORITIES AND THE WELL-BEING OF FUTURE GENERATIONS ACT

- 10.1 Delivery of this Scheme contributes to many of the goals of the Well-being of Future Generations Act, in particular the delivery of a prosperous, resilient and healthier Wales.

- 10.2 Both project proposals make a positive contribution towards the Council 2016-2020 Corporate Plan priorities – Economy – Building a strong economy, People – Promoting Independence and positive lives for everyone, Place – Creating Neighbourhoods where people are proud to live and work, while also helping people to improve their own lives and become more resilient to any future increases in energy costs.

11.0 CONCLUSION

- 11.1 Delivering an ECO Flex Scheme provides an opportunity to lever external funding into RCT to support the delivery of the Council's fuel poverty actions, while also supporting other economic and regeneration objectives. Improving the energy performance of homes also helps safeguard future generations towards climate change by reducing carbon emissions.

Other Information: -

Relevant Scrutiny Committee
Finance and Performance

Contact Office: Derek James Tel: (01443) 281115

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Rhondda Cynon Taf County Borough Council
Flexible Eligibility Statement of Intent



Energy Company Obligation: Help to Heat

Local Authority Flexible Eligibility Statement of Intent

Local authority: Rhondda Cynon Taf County Borough Council (RCTCBC)

Date of publication:

Version: 1.0 21st September 2017 to 31st January 2018

Version: 2.0 1st February 2018 to 30th April 2018

Version 3.0 1st May 2018 to 31st September 2018

Version 4.0 – for the period 1st May 2019 onwards

URL:

1) Introduction

RCTCBC welcomes the continuation of Flexible Eligibility (FE) and intends to utilise it for the purposes of reducing people at risk of or living in fuel poverty and/or cold homes. This statement sets out RCTCBC's flexible eligibility criteria for the ECO 3 Help to Heat Programme April 2019 – March 2022.

Addressing this issue is a priority for the Local Authority and over the past 10 years RCTCBC has enabled many interventions and services to help mitigate the impacts of fuel poverty for residents. This has been documented and prioritised through various strategic delivery plans and we continue to work with partners to provide or enable services which mitigate the impact of fuel poverty and create warmer homes, improve property conditions and improve the health and well-being of residents living in the borough.

In identifying households as eligible under flexible eligibility, RCTCBC is seeking to enable residents to benefit from funding and will seek the consent of households to including them in a Declaration. The Council will issue regular Declarations to Delivery Partners setting out those households that are eligible. The Delivery Partner will pass this information onto the ECO supplier through the ECO application process.

It should be noted that the final decision on whether any individual household will benefit from energy saving improvements rests with obligated energy suppliers or their contractors and not the Local Authority. Inclusion in a Declaration of Eligibility issued by the Council to a supplier will not guarantee installation of measures and the Council's role is restricted to setting eligibility criteria and verifying that residents meet the set criteria.

Whilst this approach has been taken to maximise the potential for funding the final decision will depend on the following;

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Flexible Eligibility Statement of Intent



- I. Identification of measures eligible under Help to Heat
- II. The Surveys carried out and installation costs calculated
- III. The supplier's assessment of the cost-effectiveness of installing measures in relation to achieving its obligation
- IV. Whether the supplier has achieved their targets or requires further measures to meet their Energy Company Obligation targets (this will affect the amount of funding available through the scheme)
- V. The energy savings that can be achieved for a property.

RCTCBC expects any obligated energy supplier, or contractor providing funding under ECO Flex to comply with all General Data Processing Requirements (GDPR) and to fully follow Ofgem requirements as required specified for the Energy Company Obligation Help to Heat. They would also need to act in accordance with industry best practice in relation to consumer care and quality standards of any works that may take place.

2) How RCTCBC intends to identify eligible households

RCTCBC will specifically target areas of high concentrations of low incomes, homes with poor energy performance and areas with health inequalities. Information will be publicly made available for residents to self-refer into the scheme through marketing and website updates. Details of how we will identify solid wall properties as eligible for insulation under the 'in-fill' category is also outlined below.

Subject to availability of resources within the Council and the legal use of data, the Council will target those most in need having regard to BEIS guidance on targeting, including:

- i. Those living in the private sector and in receipt of a low income (as per criteria)
- ii. We will cross-reference data on income with data that we hold or can access on Energy Performance Certificates, prepayment meters, expenditure on fuel, housing type/age/condition, heating type
- iii. Low income households living in energy inefficient housing will be identified in the private rented sector through enforcement activity under the Housing Act 2004
- iv. Working with partners to engage and reach vulnerable and hard to reach households
- v. Use of the Council's Energy Services Hub referrals and role of frontline Energy Advisors
- vi. Identifying fuel poverty through advertising campaigns to invite households to apply to the Council and area based targeting.

This will help the local authority identify households that would benefit from the installation of measures under Flexible Eligibility as follows:

- Those that are living in fuel poverty
- Those that are vulnerable to the effects of living in a cold home
- Those that would benefit from in-fill for the purposes of solid wall insulation

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Flexible Eligibility Statement of Intent



RCTCBC will identify households that meet either one of the ECO flexibility categories as follows;

Category 1 Households who meet the low income threshold and face high energy costs

Category 2 Households who meet the low income threshold and who are vulnerable to the effects of a cold home

Or those that benefit from in-fill for the purposes of solid wall insulation

Eligible Tenures:

- Registered Social Landlord/Housing Association – not eligible
- Owner Occupiers – included
- Private Rented Sector– restrictions apply to only allow properties that are E rated. Properties that are rated F or G (or unrated) can only receive renewables or solid wall insulation. No replacement or repair of a broken heating system will be allowed to any PRS properties

STAGE 1 - Identifying low income households

Rhondda Cynon Taf County Borough Council considers that households that receive a lower than average income (based on local income figures) are at risk of Fuel Poverty. ONS data for RCTCBC was analysed to provide the 'local average figure'.

A household will be determined as having a 'low income' for the purposes of ECO Flex by the following;

Individual Circumstances

- Households with a total household income less than £30,576 after housing costs (mortgage or rent).
- Savings – an income figure for assumed 'tariff income' as per UK Guidelines on assessing tariff incomes from savings will be used as part of the households income.
- All income from wages, pensions, benefits including housing benefit and council tax benefit, universal credit (amongst others) will be included in the calculation for the household income. The only income that will be excluded from the calculation is Disability Living Allowance (DLA), Attendance Allowance (AA), Personal Independence Payment (PIP).

For the purpose of this criteria 'Housing Costs' are defined as mortgage or rent payments.

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Flexible Eligibility Statement of Intent



STAGE 2

1. Households with high costs

Households that meet the low income criteria will then be assessed to determine whether they are considered to have high energy costs from the home they live in. The assessment will consider the Energy Performance (EPC) where one is available or if not an assessment will be undertaken against the criteria in the table below.

For homes to be considered as having high housing costs, they must meet one of the following criteria;

- a. Park Homes and other permanent caravan residences (regardless of income)
- b. Privately rented properties including Houses in Multiple Occupation (HMOs)
- c. Properties heated by a fuel other than mains gas
- d. Flats above commercial premises
- e. System built properties
- f. Sheltered Housing for the elderly
- g. Households living in homes with an EPC certificate in bands E, F or G or
- h. Households that score equal to or above '50' (fifty) on the following scoring criteria

QUESTION	RESPONSE	SCORE
How many bedrooms are there in the home?	1	10
	2	20
	3	30
	4	40
	5	50
	6 +	60
What type of house 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 1964 or system built?	Yes	20
	No	0
What is the main fuel type?	Gas	0
	Electricity	20
	Other	20
Is the property a park home?	Yes	20
	No	0
Is the household an excessive energy user (as per Ofgem guidance over	Yes	10
	No	0

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Flexible Eligibility Statement of Intent



23,000 kWh of gas or 5,100 kWh of electric)		
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High energy users are defined as those households who use more than 23,000 kWh of gas and more than 5,100 kWh of electric as per Ofgem's Factsheet 96 dated 18.1.11 'Typical domestic energy consumption figures'.

2. Identifying low income and vulnerability to cold

Households that have been identified as having low income as per STAGE 1 will be assessed to determine whether they have certain characteristics that would define them as being 'vulnerable to cold'. They do not need to have been considered to have high housing costs if they have a qualifying health condition that considers them to be more vulnerable to cold, but they must have been identified as having a low income.

The qualifying circumstances and/or health conditions that are considered to make households vulnerable to cold are based upon those reflected within the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess winter deaths and illness caused by cold homes as follows;

- i. Aged 85 and over
- ii. Children under 5 and pregnant mothers
- iii. Respiratory disease (COPD, asthma)
- iv. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- v. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
- vi. Substance misusers
- vii. Dementia
- viii. Neurobiological and related diseases (e.g. fibromyalgia, ME)
- ix. Terminal illness - Cancer
- x. Limited mobility
- xi. Haemoglobinopathies (sickle cell disease, thalassaemia)
- xii. Severe learning disabilities
- xiii. Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)

To qualify as being vulnerable to cold, households must have at least one of the above health conditions.

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Flexible Eligibility Statement of Intent



Priority Banding

To ensure that the scheme continues to assist households who are most at risk of fuel poverty a priority banding assessment will be undertaken to process applications from those in most need first.

Applicants will be prioritised as follows;

High Priority	Medium Priority	Low Priority
Household income under £20k	Household income £20,001 - £24,999	Household income £25,000 - £30,576
Households that are G (EPC) Rated	N/A	N/A
Terminal Illness/Palliative Care or households with cardiovascular or respiratory illnesses	Multiple health conditions (health conditions as listed in NICE guidelines of cold related illnesses)	Single health condition (health conditions as listed in NICE guidelines of cold related illnesses)
Household member in hospital awaiting discharge and vulnerable to the effects of living in a cold home (as per NICE health condition guidelines)	N/A	N/A

The overall priority will be awarded based upon the highest level of priority from either of the two categories as shown above (do not need to score in both categories).

Example 1 -a household member with a terminal illness and the household income is £26,000 will be awarded a high priority for health under the LVC category, even though they score a low priority based upon income alone.

Example 2 – a household member with no health conditions and a household income of £18,000 will be awarded a high priority based upon their income levels under the FP category.

Example 3 – a household member with a cold related illness in hospital awaiting a safe discharge with one health condition and a total household income of £29,000 – awarded a high priority due to allow safe and timely hospital discharge.

Any referral or enquiry received that does not meet the above criteria will be considered by Rhondda Cynon Taf CBC on a case by case basis.

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Solid wall insulation “in-fill” projects

Where potential works have been identified households will be supported to take advantage of funding for solid wall insulation under “in-fill” category as set out in the BEIS guidance issued February 2019.

To qualify as ‘Infill’ properties must be private tenure and need to be ‘directly adjoined’ to the qualifying home. This includes two semi-detached properties, a detached building containing multiple properties or properties in the same Street/Terrace. The infill criteria will only apply to the installation of solid wall insulation and at least 50% of the properties must meet the eligibility criteria as long as the number of ‘In-Fill’ properties do not exceed 50%

3) Governance

Responsible officer

The officer below will be responsible for signing Declarations on behalf of the local authority.

Job title: Heat & Save Team (Housing Strategy Officer/Housing Energy Officer)

Telephone: 01443 281136

Email: heatandsave@rctcbc.gov.uk

Other local governance will include anonymous checking from another Officer to verify that households are being referred in accordance with agreed intention. There may also be other Audits from the council’s internal Audit team in accordance with normal grant auditing of the Council’s Capital Housing Programme

4) Referrals

RCTCBC is already working with local primary care providers to market ‘Heat & Save’ energy efficiency advice and grant services to residents with health related conditions. We also work with Communities First Clusters areas and the Council’s over 55 forum. We also have existing close working relationships with Care & Repair agencies and other partners that are already directing referrals to the Housing Energy Officer for advice and assistance. Referrals from a third party would also include community groups or money savers projects, citizens advice services etc.

The Council is also developing links with secondary care provider to advertise the services and assistance available.

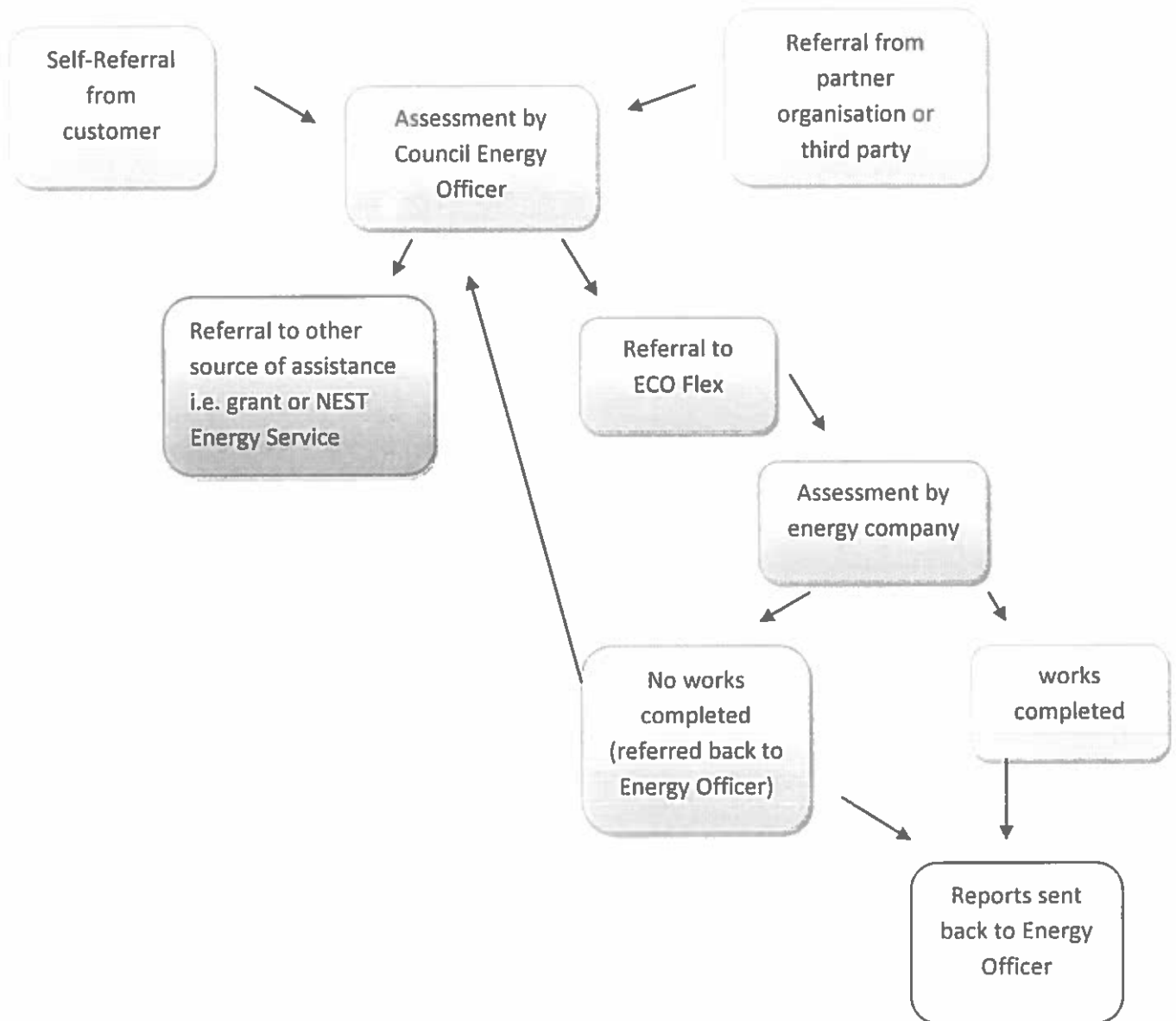
The Council as part of identifying ‘fuel poor areas’ at risk will also seek to obtain health data to help inform strategic decisions for targeting marketing and advertising to certain areas within the borough.

APPENDIX A

Rhondda Cynon Taf County Borough Council
Flexible Eligibility Statement of Intent



Referral Pathways



APPENDIX A

Rhondda Cynon Taf County Borough Council
Flexible Eligibility Statement of Intent



5) Evidence, monitoring and reporting

- a. Declarations will be valid for 18 months or until 31st March 2022, whichever is the soonest
- b. Anonymised data on the characteristics of households reached through FE will be reviewed.
- c. The data above will include details of households assessed, how many were deemed eligible and ineligible, and how many received heating and insulation improvements
- d. [All households for whom Declarations were made will be contacted within 3 months to confirm that measures have been installed

6) Signature

NAME:

POSITION:

Rhondda Cynon Taf County Borough Council

DATE:

EQUALITY IMPACT ASSESSMENT FORM

Please ensure that you refer to the 'Equality Impact Assessment Guidance' when completing this form. If you would like further assistance please contact the Equality & Diversity Team.

Details

Name of initiative to be assessed: ECO - Flexible Eligibility Scheme

Name of responsible officer: Keryl Lanfear

Group/Directorate: Prosperity & Development Services

Service Area: Housing

Date: 30.4.19

a) What are you assessing for impact?

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal	Information/ Position statement
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

b) Please name and describe below:

Eligibility criteria for ECO flex scheme which enables residents to access external funding for energy efficiency measures, if they meet the Council's discretionary eligibility criteria.

c) Is the delivery of this initiative affected by legislation or other drivers such as codes of practice? If so, please identify what and how

Energy Company Obligation Order 2013

d) Does the initiative directly affect service users, employees or the wider community?

Yes
No

Continue assessment

No need to continue screening or carry out an EqIA

EQUALITY IMPACT ASSESSMENT FORM

Screening/Relevance Test: Is an equality impact assessment required?

Screening is used to decide whether the initiative you are responsible for has a high or medium impact on any of the protected groups and will require a full EqIA.

Please provide details of the possible impact your proposal may have on the following groups, this may not necessarily be negative, but may impact on a group with a particular characteristic in a specific way.

You should also identify whether this constitutes a high, medium or low impact.

Please refer to Equality Impact Assessment Guidelines for further information.

Protected Characteristic	Impact
Age	Low
Disability	Low
Gender Reassignment	Low
Marriage and Civil Partnership	Low
Pregnancy and Maternity	Low
Race	Low
Religion or Belief	Low
Sex	Low
Sexual Orientation	Low
Other Characteristics	
Welsh Language	Low
Carers	Low
Armed Forces Community	Low

If after completing the EqIA screening/relevance test, you determine that this service/function/policy/project is not relevant for an EqIA you must provide adequate explanation below. (Please use additional pages if necessary).

Scheme has no positive or negative impact upon any of the protected characteristics. It is aimed at low income households and those with health conditions who may be at risk of or living in fuel poverty.

Are you happy that you have sufficient evidence to justify your decision?

Yes No

Signed: Keryl Lanfear Position: Housing Strategy Officer Date: 30.4.19

EQUALITY IMPACT ASSESSMENT FORM

N.B. If the initial screening process has identified actual or potential high or medium negative impact on a particular group or groups then you MUST carry out a full EqIA.

Approved by Head of Service or Director

Signed:

Position:

Date:

Full Equality Impact Assessment

You should use the information gathered at the screening stage to assist you in identifying possible negative/adverse impact and clearly identify which groups are affected.

In terms of any disproportionate/negative/adverse impact that the proposal may have on a protected group, what steps (if any) could be taken to reduce that impact for each group identified. Attach a separate action plan if necessary.

If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.

Evidence Sources

(i) Give details of any data or research that has led to your reasoning above, in particular, the sources used for establishing the demographics of service users.

(ii) Give details of how you have engaged with service users on the proposals and steps taken to avoid any disproportionate impact on a protected group and how you have used any feedback to influence your decision.

Are you satisfied that the engagement process complies with the requirements of the Statutory Equality Duties?

Yes

No

EQUALITY IMPACT ASSESSMENT FORM

Decision Log - detail how Elected Members and Senior Managers have been involved in the decision process (give dates of key meetings and decisions made).

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Review

Date of Next Review:	
If review is not required, explain why:	

Completed by:	
Signature:	
Job Title:	
Date:	

This assessment must be approved by an appropriate Head of Service or Director

Approved by:	
Signature:	
Job Title:	
Approval date:	

Please return a copy to:

Equality & Diversity Team
The Pavilions
Cambrian Park
Clydach Vale
CF40 2XX

Email: equality@rctcbc.gov.uk