

# Home Energy Improvement Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	November 2020
Review date:	November 2023

1	Introduction
1.1	As a responsible landlord, One Vision Housing (OVH) aims to provide homes and services that reduce fuel poverty, lower carbon emissions and improve the efficient use of energy.
1.2	<p>This Policy sets out the provisions OVH puts in place for:</p> <ul style="list-style-type: none"> <li>• For reducing domestic energy consumption through the installation of physical measures and improvements (internally and externally funded)</li> <li>• Provision of advice to customers to help lower energy bills</li> <li>• A rationale for when OVH will and will not grant permission for measures to properties that are externally funded, for example through Green Deal or Energy Company Obligation funding streams</li> </ul>
1.3	<p>Operation of the Policy also ensures compliance with the Regulatory Framework for Social Housing, adopted by the Regulator for Social Housing (RSH), as follows:</p> <ul style="list-style-type: none"> <li>• Registered Providers shall: <ul style="list-style-type: none"> <li>○ ensure that tenants’ homes meet the standard set out in section five of the Government’s Decent Homes Guidance<sup>14</sup> and continue to maintain their homes to at least this standard</li> <li>○ meet the standards of design and quality that applied when the home was built, and were required as a condition of publicly funded financial assistance, if these standards are higher than the Decent Homes Standard</li> <li>○ in agreeing a local offer, ensure that it is set at a level not less than these standards and have regard to section six of the Government’s Decent Homes Guidance</li> <li>○ provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choices to, tenants, and has the objective of completing repairs and improvements right first time</li> <li>○ meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes</li> </ul> </li> </ul>

<p><b>1.4</b></p> <p><b>1.4.1</b></p> <p><b>1.5</b></p> <p><b>1.5.1</b></p> <p><b>1.5.2</b></p> <p><b>1.5.3</b></p>	<p><b>Access and Communication</b></p> <p>OVH is committed to ensuring that our services are accessible to everyone. We will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.</p> <p><b>Equality, Diversity and Human Rights</b></p> <p>OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity/ Gender Expression, Sexual Orientation, Religion and / or Belief, Marriage and Civil Partnership, Pregnancy and Maternity.</p> <p>OVH also recognise that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p>OVH will also ensure that all services and actions are delivered within context of current Human Rights legislation. Staff and others with whom we work, will adhere to the central principles of the Human Rights Act (1998).</p>
<p><b>2</b></p>	<p><b>Statement of Intent</b></p>
<p><b>2.1</b></p> <p><b>2.2</b></p> <p><b>2.3</b></p>	<p>OVH is committed to improving the energy efficiency in its homes and reducing the effects of ‘fuel poverty’ and the ‘fuel poverty gap’ for its customers. The revised definition / framework views fuel poverty inequalities in terms of:</p> <ul style="list-style-type: none"> <li>• Different dwelling characteristics – especially the level of thermal efficiency</li> <li>• Different household and tenants characteristics – i.e. the disabled or elderly that spend more time at the property and where the effects of fuel poverty are likely to be exacerbated</li> <li>• The prices paid for energy</li> </ul> <p>OVH will meet the requirements of the Energy Efficiency Regulations 2015 by ensuring each property for rent (domestic and commercial) has an Energy Performance Certificate (EPC) rating of ‘E’ or above.</p> <p>OVH will, wherever possible, combine the stock assessment information it holds from Energy Performance Certificates (and other information it holds on energy performance) with information held on customers, their household characteristics and energy use patterns. This combined approach will be used to inform its approach to intervention measures to improve the energy efficiency in OVH properties.</p> <p>Through the combined approach outlined above, OVH’s actions to improve energy efficiency in its properties contribute to the wider aims of:</p> <ul style="list-style-type: none"> <li>• Improved health and wellbeing for OVH customers</li> <li>• Reduced customer debt</li> <li>• Improved thermal comfort for customers</li> </ul>

	<ul style="list-style-type: none"> <li>• Sustainable communities with reduced tenancy turnover</li> <li>• More attractive homes for prospective customers to live in</li> <li>• Reduced maintenance costs</li> <li>• Improved asset value</li> <li>• Contribute to the UK Government target to reduce carbon emissions</li> </ul>
2.4	<p>OVH will work in close partnership with Local Authorities in the area of its operation ensuring all measures to improve home energy efficiency are integrated, provide value for money and help to achieve wider strategic aims and objectives.</p>
2.5	<p>OVH will seek to maximise funding opportunities to supplement or complement its own resources allocated to home energy improvement measures. This will include working with energy providers, energy advisors and other external bodies to:</p> <ul style="list-style-type: none"> <li>• Access grant funding</li> <li>• Develop joint programmes to drive efficiencies</li> <li>• Investigate use of new and emerging energy efficiency technologies</li> <li>• Target intervention measures at property types that are difficult to treat, have below average SAP ratings – (See Section 5 for details) or where the fuel poverty gap for customers is deemed to be the highest</li> </ul>
2.6	<p>OVH will ensure that all measures it takes to improve the energy performance of its properties meets all legal requirements including those outlined in:</p> <ul style="list-style-type: none"> <li>• The Warm Homes and Energy Conservation Act 2000</li> <li>• All appropriate building and planning regulations</li> <li>• The Housing Health and Safety Rating System as outlined in the Housing Act 2004</li> </ul>

<b>3</b>	<b>Policy</b>
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3.1	<b>Actions to Improve Energy Efficiency in Homes</b>
3.1.1	<p>Since it was formed, OVH has invested significantly in its housing stock in order to meet and exceed the Governments Decent Homes Standard. In addition to these improvements OVH has used its own resources and external funding to deliver programmes designed to improve the thermal efficiency of properties. Measures taken include:</p> <ul style="list-style-type: none"> <li>• Installation of replacement double glazed windows to a minimum of B-rated standard</li> <li>• Installation of loft, wall and external wall insulation, as appropriate for property type</li> <li>• Installation of energy efficient boilers and heating systems</li> </ul>
3.1.2	<p>OVH will ensure all future replacement programmes for these measures and any ad-hoc installations will be of a specification that complies with the prevailing regulations and quality standards at the time.</p>
3.1.3	<p>OVH will carry out an energy assessment via an accredited Energy Assessor on all properties that become void (empty and undergoing works to get them back to a lettable condition) to generate an Energy Performance Certificate (EPC) which will be stored on a national database (unless a current EPC has been carried out within the last 10 years). Additional EPCs will be generated to ensure minimum energy efficiency standards are met in line with the regulatory requirements.</p>

**3.1.4** Information from EPC's will be collated and used to determine the nature, timing and prioritisation of future investment programmes as well as providing tenants with information on low level and low cost measures that occupants can implement to improve the energy efficiency of the property.

**3.1.5** New tenants moving into OVH properties for the first time will be given a copy of the EPC when they move into the property.

## **3.2 Permissions to Install New Energy Efficient Measures**

**3.2.1** Where tenants wish to install new energy efficient measures to OVH properties either funded through their own resources or via external funding routes, for example Green Deal or Energy Company Obligation funding, they will first need to obtain OVH's written permission (where this impacts on the fabric of the building in anyway).

**3.2.2** OVH will review such 'requests to alter' on a case-by-case basis but reserves the right to refuse permission where the improvement requested:

- Is likely to damage OVH property in its installation process or is in any other way unsuitable for the property
- Creates an on-going maintenance cost that OVH would not have otherwise had to cover (without the measure / installation taking place)
- Is work that OVH may be planning (within a reasonable timescale) to complete on a programme or ad-hoc basis based on known property / customer information
- Is unlikely to deliver any meaningful cost savings to existing or future tenants of the property, (for example where requests for installation of water meters is received from larger properties, with larger households that are likely to have high water usage)
- If from a property where a starter tenancy is in place and has not been converted into an assured tenancy
- Is from properties where the current occupants are under or over occupying
- Is from properties where OVH are taking any tenancy enforcement action against the current tenants

## **3.3 Permissions to install water meters**

**3.3.1** Where tenants request to put water meters in OVH properties in order to save money, OVH will use the United Utilities guidance on installations of meters. The advice can be viewed in full on the link below:  
[http://www.unitedutilities.com/documents/Water\\_meter\\_application\\_pack.pdf](http://www.unitedutilities.com/documents/Water_meter_application_pack.pdf)

**3.3.2** OVH is aware that water meters can have positive or negative financial impact on households, therefore, will recommend that customers should consider their circumstances before switching to a water meter. OVH will help customers to make a decision on whether or not to change to a water meter by providing advice on financial impact as outlined in the below table.

### 3.3.3 Potential financial impact at a glance.

TENANT CURRENT BILL	£300-400	£400-500	£500-600	£600-700	
1 person in the household	£3-103	£103-203	£203-303	£303-403	↑ Potential Savings ↓
2 people in the household	Savings unlikely	Small savings	£85-185	£85-185	
3 People in the household	Savings unlikely	Savings unlikely	Small savings	£66-166	
4 people in the household	Savings unlikely	Savings unlikely	Savings unlikely	Small savings	
5 or more people in the household.	Savings unlikely	Savings unlikely	Savings unlikely	Savings unlikely	

3.3.4 In all cases of ‘requests to alter’ OVH will carry out an assessment based on the property type, nature of improvement to be installed and the household characteristics. A written response will be sent to the principle tenant outlining OVH’s decision and the reasons behind it.

3.3.5 Where permission is refused, tenants may choose to appeal the decision via OVH’s two stage internal appeals process. Decisions of the stage 2 appeals panel will be final and there will be no further right of appeal

## 4 Implementation

4.1 All OVH staff need to be aware of the Home Energy Improvement Policy to direct any customer enquiries they receive.

4.2 An OVH Project Manager will make decisions and respond to tenants on all ‘right to alter applications’.

4.3 All decisions for future programmes of home environmental improvement measures based on information obtained through energy assessments and wider stock condition information will be made by the Energy and Sustainability Manager.

## 5 Performance

5.1 OVH will use and report on the SAP rating for its properties (Standard Assessment Procedure – which ranks the energy costs per square meter, where 0 represents zero energy costs and 100 is a net exporter of energy).

## 6 Consultation

6.1 All OVH staff have been consulted in the development of this Policy.

6.2 The OVH Tenant Policy Review Group will also be consulted in the development of this Policy.

<b>7</b>	<b>Review</b>	
7.1	The Policy will be reviewed by the Executive Management Team (EMT) every three years from the date approval, or sooner if required by changes in OVH business practice, changes in relevant legislation or regulation or as a result of system audits.	
<b>8</b>	<b>Equality Impact Assessment</b>	
8.1	Was a full Equality Impact Assessment (EIA) required?	
8.2	When was EIA conducted and by who?	An EIA Relevance Test which was conducted by the Policy and Strategy Officer and the Business Planning and Improvement Officer on 24-04-13 is still relevant.
8.3	Results of EIA	<p>The EIA Relevance Test indicated there are no differential or adverse impacts for any groups with protected characteristics as a result of the implementation of this Policy. Recommendations from the EIA Relevance Test include:</p> <ul style="list-style-type: none"> <li>• Monitoring closely the impacts of the Policy on vulnerable people, in particular the elderly and / or the disabled who are most likely to suffer the effects of fuel poverty and fuel poverty gap due to the amount of time they spend within properties</li> <li>• Monitor the effects of Welfare Reform measures on vulnerable groups and amend resource allocation accordingly</li> </ul>
<b>9</b>	<b>Scheme of Delegation</b>	
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	EMT
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Operation Director – Assets and Compliance
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operation Director – Assets and Compliance

Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
05/09/2017	In line with the review schedule	See section 6	<ul style="list-style-type: none"><li>• The Policy makes reference to the requirements of the Energy Efficiency Regulations 2015</li><li>• Job titles have been updated</li><li>• All references free home energy checks has been removed</li></ul>
17 <sup>th</sup> November 2020	In line with the review schedule	See section 6	There are no significant changes to the Policy in this review.