

Energy Company Obligation: Help to Heat

Local Authority Flexible Eligibility Statement of Intent

Local authority: Leicestershire County Council

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URL: <http://www.firstcontactplus.org.uk/our-services/your-home/warm-homes/eco/>

1) Introduction

Leicestershire County Council (LCC) welcomes the introduction of Flexible Eligibility (FE) and intends to utilise it for the purposes of reducing fuel poverty in the county.

LCC Public Health currently operates the 'Warm Homes' service via a local Warm Homes Officer providing advice and information by telephone and through home visits to support vulnerable residents. Warm Homes receives referrals from the First Contact Plus advice and signposting service also based within the Public Health department which works with front line organisations to provide information and advice and refer residents to relevant local support services. LCC welcome the FE opportunity to assist with the Warm Homes project aims to enhance the living conditions and health of vulnerable people and reduce both excess winter deaths and fuel poverty prevalence.

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.

Inclusion in a Declaration of Eligibility issued by the Council to a supplier/installer will not guarantee installation of measures. The final decision will depend on:

- i) identification of measures eligible under Help to Heat
- ii) the supplier's assessment of the cost-effectiveness of installing measures in relation to achieving its obligation, and
- iii) whether the supplier has achieved their targets or require further measures to meet their Energy Company Obligation targets.

In identifying households as eligible under flexible eligibility LCC is seeking to enable residents to benefit from funding and will seek the consent of households to including them in a Declaration. LCC expects any obligated energy supplier, or contractor working on their behalf will comply with GDPR and the Data Protection Act, to fully follow Ofgem requirements for the Energy Company Obligation Help to Heat, and to act in accordance with industry best practice in relation to consumer care and quality standards of any works that may take place. These are covered in an agreement signed by each participating energy supplier or installer as a requirement of taking part in the scheme.

2) How LCC intends to identify eligible households

2a) ECO Flexible criteria eligibility

Where relevant the Warm Homes service will intend to **signpost residents eligible under existing ECO Affordable Warmth criteria** (qualifying means tested or health benefits). Where this is not applicable applications will be processed via the flexible eligibility scheme via the below criteria; (declaration made once evidence of eligibility is established or a household has made a self-declaration that the information provided is a true and accurate reflection).

Eligible private sector households will need to meet one of the **Low Income Criteria (A)**

AND

Either one from **High Costs (B)** OR one from **Vulnerable to Cold (C)**

(A) Low Income:

- Pension Credit Savings Element
- Contributions Based Employment Support Allowance (ESA)
- Contributions Based Job Seekers Allowance (JSA)
- Housing Benefit
- Council Tax Support (not where only single occupant reduction applies)
- Have a net annual residual household income below the corresponding thresholds from the table below after payment of mortgage or rent.¹ Where household savings are below £4,000, the maximum income bands are increased by 15% for households with 2 adults and 20% for households with 1 adult after payment of mortgage or rent.²

Household composition	2019 equivalised income threshold	Threshold where household savings below £4,000
1 Adult (18+)	£9,300	£11,160.00
and 1 child	£12,200	£14,640.00
and 2 child	£15,000	£18,000.00
and 3 child	£18,000	£21,600.00
and 4+ child	£21,000	£25,200.00
2 Adults+	£15,200	£17,480.00
and 1 child	£18,200	£20,930.00
and 2 child	£21,100	£24,265.00
and 3 child	£24,100	£27,715.00
and 4+ child	£26,800	£30,820.00

(Benefit letters, payslips and/or bank/savings statement(s) must be provided/witnessed as evidence if household income assessment only. Earnings are calculated after tax)

¹ Based on BEIS ECO3 2018-22 Flexible Eligibility Guidance for income thresholds.

² Illustrative example: A couple with 2 children earn a combined salary of £30,000 per year. They have savings of £2,000 and are not eligible to claim any benefits. They pay a mortgage of £500 a month. After deducting the mortgage payments their annual residual income is £24,000 meaning they qualify in section A (Low Income) based on the **15% uplift** since their level of savings is below £4,000 and residual income is below the threshold for a household with 2 or more adults and 2 children.

(B) High Cost:

- The property has an Energy Performance Certificate (EPC) rating of E, F or G (where deemed as an accurate representation – i.e. property has not drastically changed since surveyed)
- Property has no fixed heating system or no hot water system
- Main heating system is broken
- Non mains gas heating systems
- No mains gas connection to property
- The property reaches a total score of 10 or above through the below methodology (where EPC does not exist or is outdated);

Question	Response	Score
How many bedrooms are there in the home?	1	0
	2	10
	3	18
	4	25
	5 or more	32
Are energy payments made by Direct Debit?	Yes	-7
	No	0
What type of property is it?	Semi-detached	2
	Detached	6
	Mid terrace	-10
	End terrace	0
	Flat / Maisonette	-20
When was your house built?	Before 1930	22
	1930 - 1964	14
	1965 - 1981	8
	1982 - 2002	4
	2003 or later	0
Does the home have central heating? (i.e. radiators and a boiler)	Yes	-5
	No	10
How is your main heating system powered?	Mains gas	-2
	Electric	18
	Oil	8
	LPG (bulk/bottle gas)	10
	Solid Fuel	12
	Low carbon e.g. heat pump / biomass boiler	-20

What type of walls does your property primarily have?	Solid brick/stone	15
	Cavity wall (insulated)	0
	Cavity wall (not insulated)	5
	Other (e.g. system build, concrete block, cob, park home)	15
Does at least one member of the household spend most of the day in the home?	Yes	1
	No	0

(C) Vulnerable to Cold:

- Where a resident is vulnerable if:
 - Pregnant (*Mat B1 letter*)
 - Children aged under 5 (*birth certificate*)
 - Aged over 65 (*birth certificate, driving licence, passport, medical letter*)
 - Hospital admission due to a fall (*Letter from a medical professional*)
 - Engaged with substance misuse/addiction services (*liaison with service*)

OR

- Has a diagnosed health condition that can be exacerbated by the cold including:
 - Cardiovascular conditions
 - Respiratory conditions (in particular chronic obstructive pulmonary disease (COPD) and childhood asthma)
 - Musculoskeletal conditions (Osteoarthritis, Rheumatoid Arthritis)
 - Neurological conditions (ME, Fibromyalgia, Dementia, Multiple Sclerosis, Epilepsy)
 - Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV, resulting from cancer treatment)
 - Mental health conditions (e.g. schizophrenia, bipolar disorder, or medicated Depression, Anxiety)
 - Disabilities (diagnosed condition or impact on mobility or receipt of disability benefit e.g. PIP, DLA)
 - Terminal illness
 - Severe learning disability
 - Cancer
 - Haemoglobinopathies (sickle cell disease, thalassaemia)

(Letter from medical professional required to evidence condition(s))

2b) Solid Wall Insulation (SWI) “in-fill”

LCC and the Warm Homes service are not actively seeking households requiring SWI grants through ECO. This is due to it being likely that fuel poor households will be unable to afford the significant household contributions required to cover the remaining installation costs beyond the ECO subsidy.

To increase the economies of scale of SWI projects, solid wall homes (i.e. brick or stone without a cavity) which are not 'fuel poor' can be classified as eligible for measures under the ECO Flexible funding where they are co-located with a minimum percentage of households assessed to be fuel poor (as per the above Low Income and High Cost (A+B), or Low Income and Vulnerable to Cold (A+C) criteria). SWI availability will be dependent upon whether it is a measure the contractor or energy supplier partner offer. The in-fill criteria will be summarised by BEIS:

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 LA as FP or LIVC (i.e. 50% of the properties are FP or LIVC).	The other private property to which it is directly adjoined is eligible for solid wall insulation. This is known as the in-fill property.
Project consisting of any premises that are contained in the same building (e.g. flats), immediately adjacent buildings (eg neighbouring properties) or in the same terrace .	All properties that are receiving a LA Flex measure must be covered by a declaration. This applies to LIVC, FP and in-fill properties. Up to 50% of total FP or LIVC combined properties within the project can receive a measure.	The in-fill 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 FP or LIVC.

3) Acting on behalf of another local authority:

LCC is not acting on behalf of another local authority outside Leicestershire and will only make declarations on behalf of Leicestershire County residents via contact with the Warm Homes service living in the following local authority boundaries:

- Blaby District Council
- Charnwood Borough Council
- Harborough District Council
- Hinckley & Bosworth Borough Council
- Melton Borough Council
- North West Leicestershire District Council
- Oadby & Wigston Borough Council

District councils and other front-line organisations are invited to identify and refer households to contact the Warm Homes service through the First Contact Plus team in the LCC Public Health department.

Joint statement of intent

Several district councils in Leicestershire have established their own local ECO Flex SOIs. This SOI is designed as a separate offer available across the entire Leicestershire County Council administered region, for the benefit of the Warm Homes service and to ensure a minimum ECO Flex offer is available to all Leicestershire residents. This SOI will run in parallel with any existing local offer to ensure residents can be referred to that which is most appropriate.

LCC intend for eligible households to be referred through existing First Contact Plus pathways to the Warm Homes service to assess for eligibility with declarations made by the Warm Homes Officer, Alex Clark.

4) Governance

The SOI will be signed on behalf of Leicestershire County Council by Director of Public Health Mike Sandys.

Declarations will be signed on behalf of Leicestershire County Council by the Warm Homes Officer, Alex Clark (First Contact Plus).

5) Referrals

LCC expect declarations made for this funding will result from referrals via the established pathways from local authorities and other front-line staff to First Contact Plus and the Warm Homes service within Public Health. This includes health and social care sectors, the voluntary sector and other agencies. Residents may also self-refer for advice via the First Contact Plus website and be contacted within a target of 2 working days.

LCC will maintain a list of accredited providers of ECO funded measures to which residents declared eligible under ECO Flex criteria will be free to approach any provider of their choosing with their declaration. Installers of measures will be able to join this list upon signing data protection and outcomes reporting agreements and providing evidence of accreditation with relevant ECO funding standards (PAS2030:2017 and relevant future amendments). This opportunity will be advertised to businesses through appropriate channels such as Source Leicestershire. Guidance on the scheme and measures offered by providers on this list will be detailed on a dedicated webpage.

Targeting:

LCC may propose targeting of households based on available resources and data sets:

- EPC data
- Benefit data
- Health Needs Assessment & and Public Health data identifying priority neighbourhoods with higher prevalence of fuel poverty, deprivation and health inequalities
- GP referrals

- Non gas data

General referrals will also be encouraged through the existing Warm Home service promotion by the Public Health and First Contact Plus teams as well as the service promotion by Peterborough Environment City Trust (PECT);

- Editorial in the Council's *Leicestershire Matters* magazine to residents
- Articles in the *Staff Matters* newsletter
- Articles in local newsletters
- Offer to households during triage and follow-up calls by First Contact Plus team when discussing any referrals received
- Contractors leafleting to those properties in surrounding areas to those already being supported
- Community events and staff training

6) Evidence, Monitoring and Reporting

LCC will provide central administration for the ECO Flexible eligibility for Leicestershire. First Contact Plus and Warm Homes will hold all required householder information including the SOI qualifying criteria evidence (e.g. record of self-declaration, benefit letters, EPC data, WHO home visit documentation) and signed declarations.

LCC will maintain a record of the numbers of households referred for ECO flexible eligibility together with the number of ECO flexible eligibility funded measures installed. This will be utilised for annual reporting purposes to BEIS.

LCC will audit the process by requesting one in 20 applicant households provide evidence of eligibility at the time of approval and checking this as the application goes ahead. If a resident cannot provide the required evidence this will not affect their eligibility, however, a high level of non-compliance will trigger a review of the flexible eligibility process. Evidence of eligibility received will be noted and then immediately destroyed. If a resident is receiving support through a home visit, the visiting officer or other front line professional staff can confirm eligibility by noting that appropriate evidence has been witnessed.

As described in section 5 and above, evidence, monitoring and reporting will be undertaken for the following reasons:

- i) Monitoring the effective targeting of households in line with the aims of the Warm Homes service.
- ii) Monitoring which households of those targeted and declared eligible have subsequently received measures or reasons for drop-out.
- iii) Method and frequency of information reporting between those with decision making responsibilities to ensure data is kept secure
- iv) To guide future adjustments to the scheme to ensure it works effectively
- v) Data auditing
- vi) The use of controls to deter, prevent and detect fraud.

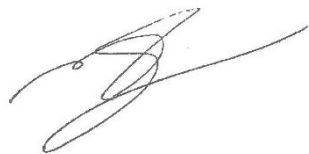
LCC expect to collect data including household characteristics to assist in delivering, reporting and adjusting the scheme as appropriate which may include:

- i) A URN (unique reference number)
- ii) Referral date
- iii) Name of resident(s)
- iv) Address of property
- v) Number of bedrooms
- vi) Contact details
- vii) Survey date
- viii) Household measure characteristics including heating type and condition, insulation status
- ix) Full cost of measures
- x) Grant contribution
- xi) Customer contribution
- xii) Installation date
- xiii) Drop-out and reasoning
- xiv) Qualifying ECO Flex criteria met (i.e. Low Income (A) plus High Cost (B) or Vulnerability to Cold (C) and sub categories.

The data outlined above will be anonymised for reporting purposes to BEIS. Providers of ECO measures will report to LCC the outcomes of declarations received including measures successfully installed which will be matched to the URN given on the declaration. Outcomes will be matched to the record held by LCC to inform reporting and evaluation of the scheme. No personal identifiable information will be shared.

LCC will seek partnerships locally where possible to ensure that local businesses benefit from the opportunities arising and will advertise the opportunity via the Source Leicestershire portal. LCC will periodically review this scheme and may choose to change any existing methodology to ensure the best offer for residents can be realised. This may include working with more than one delivery partner or energy supplier to ensure the widest selection and coverage of improvement measures are available to residents.

7) Signature



Mike Sandys

Date: 20/05/2019

Director of Public Health, Leicestershire County Council