

# Stratford on Avon District Council Flexible Eligibility Statement of Intent

## Eligibility Criteria for the ECO: Help to Heat Programme

April 2017 - September 2018

This statement sets out the council's flexible eligibility criteria for the ECO: Help to Heat programme September 2017 – September 2018.

### 1. The Roles and Responsibilities of the Local Authority

The Council acknowledges that it is required to:

- Produce and publish a Statement of Intent
- Produce, authorise and issue the declaration determining a household to be eligible
- Retain information to sufficiently evidence that a household meets the criteria outlined in the Statement of Intent for future reporting or audit

In response to this, this Statement of Intent is the council's response to the revised flexibility criteria which sets out the principles defining the council's eligibility criteria.

### 2. What is the ECO Scheme?

The Energy Company Obligation (ECO) is a government energy efficiency scheme in Great Britain to help reduce carbon emissions and tackle fuel poverty. The Help to Heat element of the Government's ECO programme, also described as the Home Heating Cost Reduction Obligation (HHCRO), focuses on low income and vulnerable householders. These are householders who receive specific benefits and, for tax credits and universal credits, are below a certain income threshold.

### 3. What are the qualifying Criteria for the ECO - Help to Heat Group

A person living in private domestic premises is a member of the help to heat group if they receive one of the following benefits:

- Income-related Employment and Support Allowance
- Income-based Jobseeker's Allowance
- Income Support
- Pension Guarantee Credit

OR

- Tax credits

On the condition that the household's relevant income does not exceed the amount set out in the rows corresponding to the type of claim and the number of children or qualifying young persons.

Type of claim	Number of children or qualifying young persons for whom the claimant is responsible				
	0	1	2	3	4 or more
<b>Single claim</b>	£13,200	£17,400	£21,600	£25,800	£30,000
<b>Joint claim</b>	£19,800	£24,000	£28,200	£32,400	£36,600

OR

- Universal Credit

On the condition that the household's relevant monthly income in any of the preceding 12 assessment periods does not exceed the amount set out in the rows corresponding to the type of claim and the number of children or qualifying young persons.

Type of claim	Number of children or qualifying young persons for whom the claimant is responsible				
	0	1	2	3	4 or more
<b>Single claim</b>	£1,100	£1,450	£1,800	£2,150	£2,500
<b>Joint claimant</b>	£1,650	£2,000	£2,350	£2,700	£3,050

#### 4. What is Flexible Eligibility?

For the period running from April 2017 – September 2018 energy suppliers will be able to achieve up to 10% of their Affordable Warmth target in households falling outside of the eligibility criteria described in section 2 above who are defined as eligible by local authorities through their Statement of Intent.

There are two main categories of private tenure targeted by the scheme:

- People living in fuel poverty, in particular those not in receipt of eligible benefits
- People living on a low income and vulnerable to the effects of living in a cold home

In addition, a proportion of non-fuel poor homes (in-fill) will be allowed for Solid Wall Insulation projects, if:

66% of blocks of flats, terraces, adjacent properties are fuel poor/low income and vulnerable to cold or:

50% of semi-detached houses or bungalows and two premises' buildings are fuel poor or low income and vulnerable to cold.

#### 5. How we intend to identify eligible households

**Evidence base:**

##### **Fuel Poverty**

The latest fuel poverty figures for Stratford were published in June 2017. In 2015, 7,203 households (13.6%) in Stratford were fuel poor; this has risen from 12.1% in 2014. This is above the Warwickshire (12.2%) and West Midlands (13.5%) averages.

Fuel poverty at local level uses lower super output areas (LSOAs) which are small areas covering around 1500 residents. As a district we have 45 LSOA with fuel poverty higher than the national average of 11% and 31 LSOA's higher than the Warwickshire average. The LSOAs with the highest proportion of fuel poor households are some of more rural areas such as Long Compton. We are aware that rural areas in our district and those living in old and poorly insulated homes are most vulnerable to cold. They are predominantly paying higher fuel cost, and also have houses that are potentially experiencing higher levels of heat loss.

In defining our criteria we need to consider all the implications not just fuel poverty that might lead to a household being on a low income and vulnerable to cold. We have looked into details of deprivation (specifically IMD data), income and health to help define the criteria we have chosen.

The Council has for many years appreciated the need to promote home energy efficiency and support vulnerable residents in achieving an affordable heating regime. Given rising energy prices and Climate Change, it has never been more important to ensure that we conserve energy and promote, at the domestic level, the use of low and zero carbon energy sources and support residents in lowering fuel costs.

### **Social Exclusion**

The Council, a partner within the Social Inclusion Partnership, commissioned research on behalf of the Partnership from the Warwickshire Observatory to examine a range of data sets held by the District and County Councils. These included census data, benefits data and anonymised information from partners. This data was reviewed by researchers and collated to form a research report. The research looked at many measures of social exclusion under seven themes:

- Isolation
- Cohesion
- Health and Wellbeing
- Education, Employment and Training
- Income and Debt
- Housing Need
- Housing Condition

Several key messages are very clearly demonstrated through the research that was undertaken. They include:

- There is strong urban/rural split with evidence through the research to suggest that parts of Stratford upon-Avon and the market towns have some significant challenges in terms of excluded communities.
- There is significant evidence that the most socially excluded communities are geographically located in the former Council housing estates, now owned/managed by Orbit Housing Association.
- There is evidence that some areas with good access to facilities and services may contain households most in danger of becoming isolated.
- Certain geographically isolated communities have significant issues around fuel poverty.
- Geography and LSOA measures can distort the picture. For example, when Lighthorne Heath is removed from Lighthorne village and measured alone, a far more acute picture of social exclusion emerges.

- Certain LSOA's have very high levels of unpaid carers, in particular Studley South and Common.
- Both education, employment and training plus health and wellbeing appear to show very strong correlation with income and debt.
- Housing condition as measured shows that those living in areas of Housing Association accommodation are often living in better standard accommodation, than other tenures.
- Significant levels of housing need can also be found in geographies where there is a higher concentration of housing association properties.

We will be using these key findings as part of the evidence base to support our criteria for the 'flexible' element of ECO.

**Income** – Average income in Warwickshire is £27,267 (2013). Stratford has the biggest differential between residential and workplace wages, at £5,022 – implying that local jobs in the area could be concentrated in lower-skilled sectors and/or with lower earning potential. The low workplace earnings in Stratford reflect large numbers employed in retail and tourism. Higher-earning residents tend to commute out of Stratford for higher-value jobs elsewhere.

**Health** – South Warwickshire CCG has an older age profile and its 65 years+ and 85 years+ population size is significantly larger than that of both Coventry & Warwickshire as a whole and nationally. Its total future population growth is significantly lower but its 65 years+ and 85 years+ population's growth will be significantly higher than that of both Coventry & Warwickshire as a whole and nationally by 2035. This raises a considerable financial challenge with fewer working age people in the CCG area and increased adult health and social care responsibilities associated with an aging population.

To ensure that we address the principles set out with the JSNA we will target households containing people with the following characteristics, which reflects the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess winter deaths and illness caused by cold homes.

1. Aged over 60, and particularly those over 75
2. Children under 5 and pregnant mothers
3. Respiratory disease (COPD, asthma)
4. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
5. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
6. Substance misusers
7. Dementia
8. Neurobiological and related diseases (e.g. fibromyalgia, ME)
9. Cancer
10. Limited mobility
11. Haemoglobinopathies (sickle cell disease, thalassaemia)

12. Severe learning disabilities

13. Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)

To ensure that we can support households in the District that are low income and vulnerable to cold we have developed the following series of criteria:

**Criteria 1:** Low Income High Cost fuel poverty data. Any household within an LSOA with fuel poverty levels above the Warwickshire average of 12.2% (2015 data set) will be eligible.

**Criteria 2:** Anyone who has qualified for a previous heating scheme listed below, or disabled facilities grant (all pre-qualified) or the Council's HRA will automatically qualify.

Previous heating schemes:

- NEA Boilers on Prescription
- Warwickshire Warm and Well Scheme

**Criteria 3:** Anyone over the age of 65 years old, or a household with a child under the age of 5 years old or a householder is pregnant with a household income below £32,552 (2016 data) per annum.

**Criteria 4:** Private rented sector households in Stratford District for insulation measures only.

**Criteria 5:** A householder with an existing diagnosed health condition made worse by living in a cold home (such as a cardiovascular conditions, respiratory conditions) and an EPC rating of E, F and G and/or an income of below the average income £27,759 per annum.

**Criteria 6:** Any privately owned household with a pre-payment meter.

**Criteria 7:** Any ex social housing property sold in to private ownership within the last 10 years.

### **External wall insulation**

We believe that demand for this in year one may be low, but we would want to support infill owner-occupied properties within a planned scheme delivered by a Registered Provider

It is important to note that this statement of intent and subsequent declarations do not guarantee funding and/or the installation of measures for any household. All measures will be subject to technical survey by the delivery partner. Schemes may close suddenly and funding withdrawn if delivery partner targets have been achieved. The delivery of the flexible eligibility going forward is subject to government policy

## **7. Governance**

Primary contact for signing the declarations will be our Home Energy Conservation Officer:

**Paul Chapman- Private Sector Housing Manager**

Stratford on Avon District Council,

Elizabeth House, Church Street,

Stratford upon Avon,

Warwickshire, CV37 6HX.

email [paul.chapman@stratford-dc.gov.uk](mailto:paul.chapman@stratford-dc.gov.uk),

## Governance process

Step	Deliverable	Key Delivery Organisation
1	Statement of intent published on council website	SDC
2	<b>Householder eligibility assessment:</b> Householder contact logged with contact centre and checked against criteria	Act on Energy
3	Householder offered additional energy advice i.e switching suppliers, understanding their energy bill, smart meters to ensure holistic service	Act on Energy
4	Declaration collation <ul style="list-style-type: none"> <li>- Batch of properties added to declaration</li> <li>- Cross checked with information in statement of intent</li> </ul>	Act on Energy
5	Declaration approval signed Agree and check content of the declarations. Any rejections return to step 2.	HECA officer at SDC Or HEART Service
6	Referral sent to energy supplier with customer consent	SDC/ Act on Energy
7	<b>Property eligibility assessment;</b> Technical survey	Energy Supplier
8	Measure and funding options offered based on technical survey	Energy Supplier
9	Customer feedback	Energy Supplier and Act on Energy
10	Review of process, cases and customer feedback at monthly meetings	SDC/ Act on Energy /Energy Supplier

## 8. Referrals

Marketing will be undertaken by a combination of the SDC/ Act on Energy/Energy Supplier utilising available data to aid targeting to the eligible criteria groups referred to above. The programme will predominantly focus on self-referral as a result of marketing activity such as direct mail to households who may be eligible.

All marketing will contain the local authority logo for the organisation undertaking the marketing.

Act on Energy will take all calls related to this programme and collect the relevant data which will be stored and managed in line with the Data protection Act 1998. Householders will be asked to consent to their contact details being passed from Act on Energy to the Energy Supplier to continue in the process.

SDC will confirm with Act on Energy when the declaration has been made and those referrals will then be passed to the Energy Supplier for the technical survey.

## 9. Evidence, monitoring and reporting

Key performance Indicators – Quarterly Reporting structure will be in line with the table as follows:

<b>Activity</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>
Marketing activity e.g. Letters to households within LSOA				
Calls generated from LSOA				
Referrals to Energy supplier				
Other onward referrals				
No receiving energy advice				
Technical surveys completed				
Loft installs				
CWI Installs				
Boiler Installs				
Number of Installs audited				
Customer satisfaction forms				

### Signature –

Name - Cllr Peter Richards

Position - Portfolio Holder

Organisation – Stratford-on-Avon District Council

Signed - Peter Richards

Dated: 19 January 2018