

October 2018 v2

Local Authority ECO Flexible Eligibility Statement of Intent

- 1) Stratford-on-Avon District Council.
- 2) Date of publication – 1 October 2018
- 3) Publication on website <https://www.stratford.gov.uk/homes-properties/energy-warmth.cfm>
- 4) Review date: to be reviewed by 31st March 2022
- 5) Statement of Intent Version 2

Flexible Eligibility Criteria for ECO – Stratford-on-Avon District October 2018- March 2022

This statement sets out the flexible eligibility criteria for ECO for Stratford-on-Avon District for October 2018 - March 2022

1. 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 child benefits, are below a certain income threshold. This eligibility criteria is set by Government.

As part of Help to Heat, ECO legislation is permitting Local Areas to define additional criteria in their area to help those fuel poor households that fall outside the Help to Heat eligibility but are still in need of support. This is called the flexible element or flexible eligibility. This requires a Statement of Intent to be produced.

2. 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:

- Universal Credit
- Tax Credits
- Disability Living Allowance
- Personal Independence Payment Living Allowance
- Carer's Allowance
- Severe Disablement Allowance
- Industrial Injuries Disablement Benefit
- War Pensions Mobility Supplement
- Constant Attendance Allowance
- Armed Forces Independent Payment
- Child Benefit (income thresholds apply- see table 1)

Table 1: Qualifying income thresholds for households in receipt of child benefit

Type of claim	Number of children or qualifying young persons			
	1	2	3	4 or more
Single claim	£18,500	£23,000	£27,500	£32,000
Joint claim	£25,500	£30,000	£34,500	£39,000

The Help to Heat criteria is set by Government.

3. What is Flexible Eligibility?

For the period running from October 2018 - March 2022 energy suppliers will be able to achieve up to 25% of their Help to Heat 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) can be allowed for Solid Wall Insulation projects. In-fill can also apply to affordable warmth projects for example providing heating in blocks of flats.

4. The Roles and Responsibilities of the Local Authority

The council 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

5. How we intend to identify eligible households

Evidence base: ONS October 2017

Fuel Poverty

The latest fuel poverty figures for Stratford were published in June 2018. In 2016, 7,203 households (10.5) in Stratford were fuel poor; this has improved from 13.6% in 2017 following interventions.

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 – Mean income in Stratford District is £32,519 (October 2017 – source: ONS). Stratford has the biggest differential between residential and workplace wages, 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.

- 6) Aged over 60, and particularly those over 75
- 7) Children under 5 and pregnant mothers
- 8) Respiratory disease (COPD, asthma)
- 9) Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- 10) Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)

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11) Substance misusers

12) Dementia

13) Neurobiological and related diseases (e.g. fibromyalgia, ME)

14) Cancer

15) Limited mobility

16) Haemoglobinopathies (sickle cell disease, thalassaemia)

17) Severe learning disabilities

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

19) How the Local Authority intends to identify eligible households

Stratford-on-Avon District flexible eligibility

Due to the diversity of households in the District, we have developed a number of criteria to ensure that we address household vulnerability to both fuel poverty and cold.

Criteria	Owner occupiers eligible	Privately rented eligible
Criteria 1: Low Income High fuel Costs (LIHC) fuel poverty data 2016. Any household within an LSOA with fuel poverty levels above the Warwickshire average with a household income below the District mean of £32,519 (gross) per annum with high energy costs or under heating the home will be eligible.	✓	X
Criteria 2: Anyone who has qualified for a Disabled Facilities Grant in the last 3 years.	✓	X
Criteria 3: Anyone over the age of 65 years old with a household income below the Stratford District mean of £32,519 (gross) per annum.	✓	X
Criteria 4: Private rented sector households in Stratford District for insulation measures only.	X	✓
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 District mean household income of £32,519 (gross) per annum	✓	X
Criteria 6: Any privately owned household with a pre-payment meter and a household income below the District mean of £32,519 (gross) per annum	✓	X

Criteria 7: Any ex social housing property sold into private ownership (right to buy properties) with a household income below the District mean household income of £32,519 (gross) per annum	✓	X
Criteria 8: Anyone living in a park home on a residential park homes site with a household income below the District mean household income of £32,519	✓	X
Criteria 9: First Time Central Heating only- A household with no existing central heating, located within 23m of a gas main (or distance deemed feasible by the District Network Operator) and a household income below the District mean household income of £32,519 (gross) per annum	✓	✓ (existing energy efficiency band A-E only are eligible)

External Wall Insulation (EWI)

The need for an external wall insulation scheme remains. There will be some ad hoc projects. This will be reviewed when more information is available to the Authority regarding the levels of funding to support installation. Independent quality inspections of each external wall insulation job would be required for external wall insulation to be supported under flexible element.

We intend to facilitate EWI for one off properties situated within EWI schemes administered by other organisations, i.e. right to buy properties that adjoin properties having EWI installed by a social housing provider.

Acting with other Partners

Stratford-on-Avon District Council works in partnership under the long established Warm and Well in Warwickshire Partnership led by Act on Energy, and the HEART Partnership led by Nuneaton and Bedworth Borough Council. Through this, we will use the branding for delivering energy efficiency measures to tackle fuel poverty in the District.

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

10 step governance process

Step	activity	Who is responsible
1	Statement of intent published on www.stratford.gov.uk	Stratford-on-Avon District Council
2	Householder eligibility assessment: Householder contact logged with referral agent. Application and consent forms completed by the customer and returned to the referral agent.	Referral agent
3	Householder offered additional energy advice i.e. switching suppliers, understanding their energy bill, smart meters	Referral agent
4	Declaration <ul style="list-style-type: none"> - A single declaration per property is sent by the appointed referral agent to Stratford on Avon District Council - Cross checked with information in statement of intent and referral agents records Any rejected declaration return to step 2.	SDC or HEART Service
5	Referral sent to delivery partner with customer consent	Referral agent
6	Property eligibility assessment; Technical survey	Installer
7	Measure and funding options offered to the customer based on technical survey	Installer
8	Install accepted or rejected by the customer. Install arrangements made between the customer and installer	Customer and installer
9	Customer feedback requested	Referral agent
10	Review of process, cases and customer feedback completed by the Project Manager.	SDC/ Act on Energy /Energy Supplier/HEART

20) Referrals

Marketing will be undertaken by the District Council and its partners 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. Any marketing will contain the local authority logo for the organisation undertaking the marketing and the Warm and Well in Warwickshire logo as a minimum.

The appointed referral agent will take all calls related to this programme and collect the relevant data, which will be stored and managed in line with the General Data Protection Regulations 2018. Householders will be asked to consent to their contact details being passed from the referral agent to a named installer.

The Warm and Well in Warwickshire privacy notice can be viewed via

<http://www.actonenergy.org.uk/wp-content/uploads/2018/05/User-Privacy-Policy-GDPR-2018.pdf>

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Stratford-on-Avon District Council will confirm with the referral agent that the declaration has been agreed. The referral agent is then responsible for making the referrals to their chosen installer. Declarations will only be signed when received from the appointed referral agent.

The Council will also accept referrals from frontline workers who are working with a client who may require energy efficiency improvements to their homes. Full householder eligibility will be determined during the initial contact with the resident made by the referral agent.

20) Signature

Name: Dave Webb

Position: Corporate Director

Organisation: Stratford-on-Avon District Council

Signed: _____

Handwritten signature of Dave Webb, consisting of a stylized initial 'D' followed by the name 'webb' in lowercase letters.