

ECO Help to Heat Statement of Intent for Flexible Eligibility

Northumberland County Council

Darlington Borough Council

Durham County Council

Hartlepool Borough Council

Middlesbrough Borough Council

Redcar & Cleveland Borough Council

Stockton-on-Tees Borough Council

Gateshead Council

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<http://www.northumberland.gov.uk/Business/Grants/Grants-Funding.aspx#grantsfunding>

Introduction

The consortium of Local authorities listed above, led by Northumberland County Council intends to work closely with energy companies, installers and customers to maximise the input of Flexible Eligibility ECO on fuel poor households.

Under the Energy Company Obligation (ECO) Regulations 2017 - 2018 (ECO2t) local authorities can set their own criteria for eligibility for funding for domestic energy efficiency measures. This funding is aimed at those within a local authority most likely to be in fuel poverty. Energy companies can spend up to a maximum of 10% of their full obligation within these criteria.

This statement takes into account NICE recommendations on how to reduce the risk of death and ill health associated with living in a cold home. NICE guideline [NG6] Published date: March 2015
<https://www.nice.org.uk/guidance/ng6>

The aim is to help meet a range of public health and other goals. These include:

- Reducing preventable excess winter death rates.
- Improving health and wellbeing among vulnerable groups.
- Reducing pressure on health and social care services.

- Reducing 'fuel poverty' and the risk of fuel debt or being disconnected from gas and electricity supplies (including self-disconnection).
- Improving the energy efficiency of homes.

Improvements to make homes warmer may also help reduce unnecessary fuel consumption (although where people are living in cold homes because of fuel poverty their fuel use may increase). In addition, such improvements may reduce absences from work and school that result from illnesses caused by living in a cold home.

The health problems associated with cold homes are experienced during 'normal' winter temperatures, not just during extremely cold weather. (An increase in death rates due to a drop in temperature varies across England but can happen when temperatures drop below about 6°C.)

All organisations responsible for health, wellbeing, care and safety have the opportunity to impact on people's mental and physical health and wellbeing. With increased pressure on organisations to reduce costs and increase quality and productivity, services can no longer be focused on symptoms or single issues in isolation. There is a need for systemic change towards proactive prevention and a greater emphasis on addressing the wider determinants of health, such as education, housing or social environment. Treating people without identifying and changing what makes them unwell is costly to all involved.

Additional services and available support

A key support structure is the priority services registers run by energy suppliers and distributors. These schemes offer extra free services to people who are of pensionable age, are registered disabled, have a hearing or visual impairment, or have a long term health problem.

Adult social care can assess applications from households where a disability or illness is making daily life difficult. They may award a disabled facilities grant towards the cost of providing adaptations and facilities to enable the disabled person to continue to live in the property. Where necessary the grants may be awarded to improve or provide a heating system in a home which is suitable to the needs of the disabled person or to adapt heating or lighting controls to make them easier to use.

<https://www.gov.uk/government/publications/disabled-facilities-grant>

Homeowners struggling to carry out essential repairs, improvements or adaptations to their home, may be able to access an affordable loan and step-by-step support through The Helping Hand scheme. <https://helpinghandnortheast.org.uk/>

Landlord Development forums (also known as the Private Landlords forums) are held across the region. The forums are an opportunity for landlords to keep up to date with regulations and legislation governing the private sector.

The consortium's approach to the Help to Heat flexible eligibility criteria (as outlined below) has been taken to maximise the potential for funding. However fitting the criteria within this statement

of intent does not guarantee that any individual household will benefit from energy saving improvements as the final decision on funding rests with energy suppliers and will depend on:

- i) The survey carried out and installation costs calculated,
- ii) the energy savings that can be achieved for a property, and
- iii) whether suppliers have achieved their ECO targets or require further measures to meet their ECO targets (this will affect the amount of funding available through the scheme)

How the LA intends to identify eligible households

Households are considered eligible for flexible eligibility ECO if they are at risk of living in fuel poverty (FP) or a low income household, with at least one household member vulnerable to the effects of living in a cold home (LIVC). Flexible eligibility only applies to private tenure so a property must be privately owned or rented.

A. Criteria for identifying households that are living in fuel poverty (FP)

All private tenure properties within the 25% most deprived areas in the UK measured by the Government's Index of Multiple Deprivation (IMD) will be deemed at risk of living in fuel poverty (FP).

Households outside of these areas will be considered at risk of fuel poverty if they are determined to be a low income household, living in a high cost home in relation to energy use. This can be assessed using available software tools such as the UNO energy database or the NEA Fuel Poverty Assessment Tool or against the Low Income High Cost criteria outlined below.

Households need to meet Stage A.1 (Low Income) criteria **and** one of the Stage A.2 (High Cost) criteria.

Stage A.1 (Low Income)

Income here is defined as total household income after tax (including council tax) and housing costs (if they pay rent or mortgage) have been deducted. This includes income from pensions and all benefits.

A different income threshold is provided for different types of household composition, reflecting that larger households require larger incomes in order to achieve the same standard of living as smaller ones.

Household composition	Annual household income	Monthly household income Equivalent
1 adult (18 years and over)	£8,900	£740
and 1 child	£11,700	£980

and 2 children	£14,400	£1,200
and three children	£17,300	£1,440
and four or more children	£20,100	£1,680
2 adults (18 years and over)	£14,600	£1,220
and 1 child	£17,400	£1,450
and 2 children	£20,200	£1,680
and three children	£23,100	£1,930
and four or more children	£25,700	£2,140

Stage A.2 (High Cost)

Property EPC rating of E, F or G.

Or properties with an EPC rated D that are classed as hard-to-heat

Hard-to-heat homes include:

- those with solid walls
- those with no loft space
- those in a state of disrepair
- high rise blocks
- those not connected to the gas grid
- those not connected to the electricity grid

Other factors, such as listed architectural features, accessibility or construction quality may make it difficult to significantly improve the SAP rating. Such properties are sometimes described as 'hard to treat'. Although important, the major issue from a health perspective is to ensure properties are not 'hard to heat'.

B. Criteria for identifying low income and vulnerability to cold (LIVC).

Households will be considered a low income household, and vulnerable to the effects of living in a cold home, if they meet Stage B.1 (Low Income) criteria **and** someone in the household meets one of the Stage B.2 (Health and vulnerability) criteria.

Stage B.1) Low Income

Low income thresholds are taken from the guidance for fuel poverty but each one has been uplifted by £1,000 to take account of additional costs experienced by vulnerable households (e.g. medical treatments / equipment, higher energy use, transport to appointments etc.)

As before income is defined as total household income after tax (including council tax) and housing costs (if they pay rent or mortgage) have been deducted. This includes income from pensions and all benefits.

Household composition	Annual household income	Monthly household income Equivalent
1 adult (18 years and over)	£9,900	£830
and 1 child	£12,700	£1,060
and 2 children	£15,400	£1,280
and three children	£18,300	£1,530
and four or more children	£21,100	£1,760
2 adults (18 years and over)	£15,600	£1,300
and 1 child	£18,400	£1,530
and 2 children	£21,200	£1,770
and three children	£24,100	£2,010
and four or more children	£26,700	£2,230

Stage B.2) Health and vulnerability criteria

A wide range of people are vulnerable to the cold. This is either because of: a medical condition, such as heart disease; a disability that, for instance, stops people moving around to keep warm, or makes them more likely to develop chest infections; or personal circumstances, such as being unable to afford to keep warm enough.

People with long-term conditions. Studies indicate that cold conditions can exacerbate existing medical conditions including diabetes, certain types of ulcers and musculoskeletal pains. Studies have found an association between cold homes and the increased likelihood of developing symptoms of asthma and bronchitis which can develop into long-term conditions. In addition, cold homes may slow down recovery following discharge from hospital.

Criteria for identifying vulnerability to cold are listed below:

- people who have suffered a heart attack, stroke or TIA)
- people with respiratory conditions (in particular, chronic obstructive pulmonary disease and childhood asthma)
- people with mental health conditions
- people with disabilities
- people with long term health conditions (examples may include fibromyalgia, MS, diabetes, certain types of ulcers and musculoskeletal pains)
- arthritis (osteoarthritis or rheumatoid arthritis)
- older people (65 and older)
- households with children (under 16)
- pregnant women
- people who are terminally ill
- people with suppressed immune systems (e.g. from cancer treatment or HIV)

Considered on referral from a professional organisation:

- people with addictions
- people who have attended hospital due to a fall
- with cardiovascular conditions (for example heart problems, heart disease, people recent immigrants, asylum seekers and refugees)
- people who move in and out of homelessness
- households that are falling into debt due to a change in circumstances compounded by high energy costs

Scheme requirements for Solid Wall Insulation (SWI) “in-fill” projects

The local authority intends to facilitate solid wall insulation schemes including households that are not in fuel poverty or vulnerable (‘in-fill’). Flexible eligibility only applies to private tenure, therefore all the properties on a declaration, including in-fill, must be private tenure.

Where a household does not meet the criteria for fuel poverty (outlined at A) or living on a low income and vulnerable to the cold (outlined at B), the local authority can declare a household as “in-fill” where they are:

- in the same terrace as

- in an immediately adjacent building to, or
- are in the same building as a household that does meet those criteria

In-fill is only allowed where a minimum percentage of households for which the LA is providing declarations are fuel poor (FP) or on a low income and vulnerable to the cold (LIVC), as set out in Table 1.

Not all the properties in one terrace need to be included in the SWI project in order for the project to be eligible under flexible eligibility.

Table 1 - Summary of the requirements for property types under in-fill

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 property to which it is directly adjoined is eligible for solid wall insulation.
Project consisting of any premises that are contained in the same building (e.g. flats), immediately adjacent buildings (e.g. neighbouring detached properties) or in the same terrace	At least two in three properties on the list must be declared by the LA as Fuel Poor or LIVC (ie at least 66% of the properties are FP or LIVC)	The other (i.e. up to one third) of 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

Acting on behalf of another local authority

In most circumstance the designated officer signing the declaration will be from the local authority of the resident applying. However where that officer is unavailable all nominated officers from each of the local authorities that are signatory under this declaration will be granted permission to sign a declaration on behalf of any of the other authorities unless a local authority opts out of this process. If a local authority decides that all declarations from their area must be signed by an officer from that Council then they will nominate at least two.

Joint statement of intent - Participating Local Authorities

Northumberland County Council

Darlington Borough Council

Durham County Council

Hartlepool Borough Council

Middlesbrough Borough Council

Redcar & Cleveland Borough Council

Stockton-on-Tees Borough Council

Gateshead Council

All authorities are working with local partnership organisations to support this Sol a list of key partners is below;

Citizens Advice Bureau

Community Action Northumberland

Middlesbrough Environment City

The Stroke Association

Governance

The Energy Officer from each participating local authority will be responsible for signing declarations on behalf of their authority or will delegate to Northumberland County Council in the first instance. If a local authority will not agree to the above governance arrangement they will identify at least two officer posts within the local authority that can sign any required declarations.

In addition to the above a review board will be established that can be made up of any 4 members of the Energy Officers Group. Their role will be to assess individual cases where the applicant either falls just outside the qualifying criteria but there is still a clear need or where the applicant disputes the decision of the local authority in respect of them not qualifying under Flexible Eligibility. This board's decision will be final.

Referrals route from fuel poverty/vulnerability/social care or health organisations

Referrals are expected from professional organisations that may come into contact with fuel poor or vulnerable households. Some examples include (but are not limited to) social workers, health visitors, occupational therapists, GPs, housing officers, environmental health, the fire service, Community Action Northumberland, Citizens Advice Bureau, The Stroke Association, Mind, WarmZones, Age Concern, local councillors, energy companies, Communitas Energy CIC.

Evidence, monitoring and reporting

Where the Flexible eligibility criteria is used in conjunction with a consortium project then the lead authority will keep records of the applications and eligibility.

Where it is used by a project specific to one local authority area, the relevant Local Authority will be responsible for keeping records of the application.

Internal auditing will be carried out on the above data collection and monitoring mechanism

- All applications will be recorded on a secure system
- All LAs will have access to the data relating to their area.
- Service Level Agreement in place with each energy supplier that will detail acceptable time scales and processes
- Paper and electronic copies of all documents relating to each application including any evidence supplied by the applicant.
- Every applicant will be required to sign a declaration stating that the information they have supplied is truthful and accurate.

Director on behalf of STOULTON-ON-TEES BOROUGH COUNCIL

Name: RICHARD MCGUCKIN Signature: 

Date: 28.02.2018