

# Energy Company Obligation (ECO): Help to Heat

## Local Authority Flexible Eligibility Statement of Intent

Name of authority: Epping Forest District Council

23 May 2019

Publication on website ( URL):

<https://www.eppingforestdc.gov.uk/housing/private-housing/housing-conditions-and-enforcement/>

### **1 - Introduction**

This Statement of Intent (SOI) sets out how Epping Forest District Council (EFDC) intend to identify households who could be eligible for government's ECO: Help to Heat funding, in accordance with guidelines from the Department for Business, Energy and Industrial Strategy (BEIS). This Scheme is part of the government's Affordable Warmth programme.

Epping Forest District Council welcome the introduction of the Local Authority Flexible Eligibility scheme and intend to utilise the scheme to direct a proportion of funding to residents who struggle to heat their home to a comfortable standard, or who have a specific condition which may make them more vulnerable to the effects of a cold home. Through this scheme EFDC intend to reduce fuel poverty and minimise the health risks associated with living in a cold home.

**EFDC intend to work with approved contractors and obligated energy suppliers as part of energy referral scheme called Warm Homes.**

Through the Warm Homes scheme EFDC hope to utilise flexible eligibility alongside other local funding schemes where possible, to reduce the installation costs of energy measures for residents as much as possible.

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 EFDC to a supplier or contractor, will not guarantee installation of any measures, as the final decision will depend on:

- Identification of measures eligible under Help to Heat;
- The contractors or energy supplier's assessment of the energy savings that can be achieved for a property, and
- Whether the supplier has achieved their targets or requires further measures to meet their Energy Company Obligation targets.

In identifying households as eligible under Flexible Eligibility EFDC are seeking to enable residents to benefit from funding and will obtain consent from households before including them in a Declaration.

EFDC expect any obligated energy supplier or contractor working on their behalf, to comply with 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.

## **2 - How the LAs intend to identify eligible households**

ECO Flexible Eligibility Help to Heat funding is only available to private tenure households.

EFDC will identify households that may benefit from Flexible Eligibility in several ways. Subject to resources and the legal use of data, private sector households must fit one, or more of the following criteria:

- Living in fuel poverty but not in receipt of benefits
- Low income and vulnerability to cold (LIVC)

These criteria will be kept under review, in relation to levels of referrals made, delivery of installed measures and the practices of other authorities

### **A. Criteria for identifying 'living in Fuel Poverty, but not in receipt of benefits' (FP):**

For those living in private tenure, Fuel Poverty is assessed based on the National Government model of a household having high energy costs and a low income. The following ways of identifying Fuel Poverty will be assessed:

- If the household does not receive an income related benefit and has an income of £35,053 or less (after paying for rent/mortgage), then the household will be identified as 'low income' (1)
- The Council will cross reference data which we hold or can access to establish whether the household has high energy costs.

Examples include:

- Energy Performance Certificates (rated D, E, F & G)/SAP ratings, prepayment meters, expenditure on fuel, the housing type/age/condition including Park Homes, levels of insulation in the property, heating type, whether the property has a working heating system).
- Low income households living in energy inefficient housing in the private rented sector will also be identified through enforcement activity under the Housing Act 2004.

*(1) Source: a median net annual income threshold for Epping Forest District Council been calculated from the ONS dataset 'Small area income estimates for middle layer super output areas, England and Wales', utilising [Net annual income \(equivalised\) after housing costs](#) data for Financial Year ending 2016.*

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/smallareaincomeestimatesformiddlelayersuperoutputareasenglandandwales>

## **B. Criteria for identifying 'low income and vulnerability to cold' (LIVC):**

Low income will be assessed by:

If the household does not receive an income related benefit and has an income of £35,053 or less (after paying for rent/mortgage), then the household will be identified as 'low income'.

To establish vulnerability to cold, EFDC will target households containing people with the following characteristics, which reflect the *National Institute for Health and Care Excellence (NICE) 2015* guidance on excess winter deaths and illness caused by cold homes.

Specifically, these are:

- Older people (aged over 60 and particularly those over 75)
- Young children (under 5)
- People with Respiratory conditions (e.g. Chronic obstructive pulmonary disease (COPD) and childhood asthma)
- People with Cardiovascular conditions (e.g. ischaemic heart disease, cerebrovascular disease)
- People with mental health conditions (e.g. schizophrenia, bipolar disorder)
- Pregnant women
- People with addictions (e.g. substance misusers)
- People who have attended hospital due to a fall
- People with dementia
- People with neurobiological and related conditions (e.g. fibromyalgia, ME)
- People with terminal illness
- People with autoimmune & immune deficiency diseases (e.g. from cancer treatment, HIV, MS)
- People with disabilities,
- Haemoglobinopathies (sickle cell disease, thalassaemia)
- People with severe learning disabilities

Vulnerability to the cold will also be identified, by considering the living circumstances of the person, this includes:

- People who move in and out of homelessness
- Recent immigrants, asylum seekers and refugees (if living in private tenure)
- People living in Park Homes

Any referral or enquiry received that does not meet the above requirements will be considered on a case by case basis.

Where a household meets the eligibility criteria they will be recommended by the Council for funding. However, the final decision will be made by the obligated energy supplier who provides this funding, or their contractors/delivery partners.

### **C. Criteria for identifying 'Infill' properties and vulnerability to the cold:**

To encourage multi-property solid wall insulation in private tenure, EFDC may be able to provide declarations for households that are neither living in fuel poverty (FP) or living on a low income and vulnerable to the effects of living in a cold home (LIVC), known as 'in-fill' properties. This is designed to help the delivery of solid wall insulation which particularly benefit from economies of scale. If at least 50% of eligible households receive either of these measures, an adjacent property can also receive the same measure, if the number of these 'in-fill' properties does not exceed 50%.

"In-fill" is only available for private domestic premises and only allowed for solid wall insulation. This does not include social housing.

EFDC can declare a household as "in-fill" where they are:

- a) in an immediately adjacent building to; or
- b) are in the same building as a household that does meet those criteria; or
- c) in the same terrace as; or
- d) back to back entire terraces, but only if the back of the actual properties are touching (not back to back garden/ alleyway separates the terrace).

#### **Summary of the requirements for property types under in-fill**

<b>Property Type</b>	<b>EFDC declaration Requirements</b>	<b>In-fill available</b>
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 EFDC as Fuel Poor or LIVC (i.e. 50% of the properties are Fuel Poor 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 (e.g. neighbouring properties) or in the same terrace.	All properties that are receiving a ECO Flex measure must be covered by a declaration. This applies to LIVC, Fuel Poor and infill properties. Up to 50% of total Fuel Poor 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 Fuel Poor or LIVC.

### **3 - Referrals**

EFDC will ensure appropriate referral processes are in place while maintaining the protection of personal data. This will include:

- Self-referrals by residents into partnership schemes (such as the Warm Homes scheme);
- Referrals from local authorities, on behalf of residents;

- Identification of eligible households using housing stock conditions data, where held by Local Authorities;
- We will also work with partner agencies, including GPs, hospitals and other health care professions to determine those that may be vulnerable due to living in a cold home, and/or suffering from a qualifying medical condition.

#### **4 - Evidence, monitoring and reporting**

EFDC will record key information including the number of referrals made and the number of funded installations delivered for reporting to BEIS.

EFDC will inform residents that they may be required to provide evidence of income and medical/health conditions at a later date, in order to deter fraudulent claims.

#### **5 - Governance and Signatures**

This Statement of Intent (SOI) is signed on behalf of Epping Forest District Council by:

*J R Nolan*

Commercial and Regulatory Service Director  
Epping Forest District Council