

# 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 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 income based or health/care 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).

Households applying for support via the Leicestershire Warm Homes Fund Project for gas connections and First Time Central Heating should refer to separate criteria set out below in Appendix 1.

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)
- Annual household income (after tax) below the corresponding thresholds from table 1 below.

Table 1 – Income thresholds broadly consistent with those used under the low-income high cost indicator (2014)

Household composition	Annual household income threshold
No children	£21,780
Up to two children	£30,800
Three or more children	£40,260

*A child is considered as anyone under the age of 18*

*Household income is calculated from all employment, pensions, income related benefits, property, investments etc.*

### (B) High Cost:

- The property has an Energy Performance Certificate (EPC) rating of D, E, F or G
- Property does not have a central heating system (i.e. a boiler/heat pump and radiators)
- Main heating or hot water system is broken
- Non mains gas heating systems
- No mains gas connection to the property
- Primary wall type is solid, cob, park home or system build construction
- The property reaches a total score of 10 or above through the below methodology:

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 <b>main</b> 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
  - Children aged under 5
  - Aged over 65
  - Hospital admission due to a fall
  - Engaged with substance misuse/addiction services

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)

### **Extenuating Circumstances**

Where a resident fails all the above criteria, LCC reserve the right to declare residents eligible at discretion where significant identified vulnerability or hardship can be reduced by receiving support. A declaration on this basis will be made by a member of the Warm Homes service team following contact with the household. Consideration will be given to the likely cost of measures required at the property and the viability of household finances to otherwise support such work without support.

### **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 <b>semi-detached houses or bungalows</b> , or a <b>building containing no more than two domestic premises</b> .	At least one of the two-properties must be declared by the LA as FP or LIVC (i.e. <b>50% of the properties are FP or LIVC</b> ).	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 <b>same building</b> (e.g. flats), <b>immediately adjacent buildings</b> (eg neighbouring properties) or in the <b>same terrace</b> .	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 team.

## **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 service team members Alex Clark, Warm Homes Officer, Tina Potter, Warm Homes Support Officer or Kate Brown Warm Homes Support Officer.

## **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 contacting 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 (PAS2030:2017/19 and relevant future amendments). This opportunity will be advertised to businesses through appropriate channels such as Source Leicestershire. Installers will be required to sign up to a scheme and data processing agreement.

LCC shall also make available a self-declaration application form to participating providers to complete with householder consent, recognising that organisations working in the industry may be well placed to identify households requiring energy efficiency upgrades.

Guidance on the scheme and measures offered by providers on this list will be detailed on a dedicated webpage:

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

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 the Warm homes Support Officer.

- 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 (e.g. record of self-declaration, 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 contacting 1 in 20 applicant households to confirm eligible circumstances at the time the application is received. Eligible households identified by installers using the self-declaration application form may be contacted to confirm household circumstances and eligibility. 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. 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:

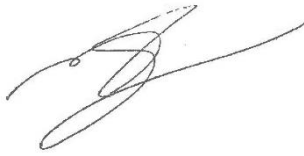
- i) A URN (unique reference number)
- ii) Referral date
- iii) Name of resident(s)
- iv) Address of property
- v) Number of bedrooms
- vi) Contact details
- vii) Survey date
- viii) Household measure characteristics including heating type and condition, insulation status
- ix) Full cost of measures
- 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: 05/10/2021

Director of Public Health, Leicestershire County Council

## Appendices

Appendix 1.

Qualification for the Leicestershire Warm Homes Fund Project first time central heating and community scheme gas network connection via Fuel Poor Network Extension Scheme (FPNES).

Leicestershire County Council is utilising Warm Homes Fund, a scheme set up by National Grid and administered by Affordable Warmth Solutions CIC to connect homes to gas and install first time central heating.

Leicestershire County Council will identify households, streets and/or estates into which it would like to see the gas mains extended and facilitate eligibility for connections and first-time central heating installation via this fund only.

One-off applications (where gas is already connected or within 23 metres) for households situated within the top 25% most deprived LSOAs will be eligible to access the gas connection and/or first time central heating installation offer without further eligibility criteria being applied.

Community schemes:

Streets or estates not currently connected to gas but which are situated within a viable distance to access FPNES funding (<50 metres) will be identified and targeted under

expanded eligibility allowing any qualifying tenure of household to receive a free gas connection and first time central heating where desired.

Due to the distribution of streets potentially viable for community scheme gas connections and areas of highest deprivation not aligning in many instances (for example areas of social housing or majority of properties already having gas central heating), LCC shall focus on streets with significant numbers of properties likely to have higher than average fuel bills due to the type of heating in place rather than solely on the basis of deprivation.

This has been determined as necessary during the project due to repeated challenges to achieve viable community schemes in which sufficient uptake of the offer as a proportion of households on a street or area has not been achieved due to eligibility restrictions resulting in schemes having to be abandoned to the detriment of applicant households. Broadening the criteria is necessary to ensure schemes can be viable and funding is utilised within project timescale limitations.

It is also acknowledged that deprivation data alone (calculated at LSOA level) may not adequately reflect the increased living costs of homes on individual streets or postcodes without gas connections within a LSOA where the remaining majority is already connected.

The following streets/estates have been identified for the infrastructure expansion and first-time central heating eligibility on the basis of higher Index of Multiple deprivation ranking (within 25% most deprived LSOAs):

- Maitland Avenue, Mountsorrel - Index of Multiple Deprivation data
- Coniston Court, Earl Shilton - Index of Multiple deprivation data
- Wortley Court, Loughborough - Index of Multiple deprivation data
- Langabeer Court, Loughborough - Index of Multiple deprivation data

The following streets/estates have been identified as eligible for gas connection infrastructure and first time central heating where a significant number of properties all utilise more expensive forms of heating (such as electric, Oil, LPG, solid fuel) where gas connections via community scheme would support all households to achieve lower heating costs.

- Ashbury Dale, Sheepsheaf
- Pennington, Wigston
- Briscoe Avenue, Loughborough
- Huston Court, Loughborough
- Field Farm Close, Loughborough
- Ronald West Court, Loughborough
- Knightthorpe Court, Loughborough
- Peppers Close, Mountsorrel
- The Orchard, Seagrave
- Former Police Station, Upper Bond Street, Hinckley
- Willoughby Gardens, Leicester Forest East
- Winterburn Gardens, Whetstone

Households within the following 14 LSOA's are also identified as fuel poor in line with the Affordable Warmth Solutions definition derived from Index of Multiple Deprivation data (2019) where an area falls within the 25% most deprived in England. Households within the following LSOA's are eligible for free gas connections and can also access the first-time central heating offer either as one-off applications or as part of identified community schemes.

<b>LSOA Code</b>	<b>LSOA Name</b>	<b>Ward</b>
E01025699	Charnwood 002A	Loughborough Bell Foundry
E01025932	North West Leicestershire 009A	Greenhill Centre
E01025725	Charnwood 003F	Loughborough Warwick Way
E01025934	North West Leicestershire 009C	Greenhill North East
E01025856	Hinckley and Bosworth 012C	Hinckley Westfield Junior School
E01025700	Charnwood 002B	Loughborough Canal South
E01025701	Charnwood 002C	Loughborough Central Station
E01025997	Oadby and Wigston 005C	Wigston Rolleston Road
E01025987	Oadby and Wigston 006C	South Wigston Blaby Road & Saffron Road
E01025992	Oadby and Wigston 005A	Guthlaxton College & Wigston Police
E01025844	Hinckley and Bosworth 006F	Earl Shilton East
E01025705	Charnwood 002F	Loughborough Midland Station
E01025829	Hinckley and Bosworth 013C	Burbage North West
E01025715	Charnwood 009B	Loughborough Shelthorpe North

Areas identified will ultimately be subject to approval by Gas Network Operators, FPNES administrators and community schemes can only take place where sufficient uptake of the offer is achieved.