



Herefordshire Council

Flexible Eligibility Statement of Intent Version 4

Published 09th September 2019

Published on Herefordshire Council website 'Home Energy' page

1. Introduction

1.1 Herefordshire Council welcomes the local authority Flexible Eligibility element of the Energy Company Obligation and believe that Flexible Eligibility offers greater opportunities for Herefordshire Council and its associated partners to support and assist fuel poor households and those at risk from cold homes.

Fuel Poverty remains a major issue in Herefordshire. According to the latest statistics, 12.2% of households live in Fuel Poverty, equating to around 9,990 homes. Fuel Poverty is prevalent across much of the county, particularly in rural areas such as the Golden Valley, Weobley and Mortimer. The larger city and town areas within the county also have significant numbers of fuel poor households, including Hereford, Leominster and Kington.

1.2 Herefordshire Council and its partners continue to work hard to enable effective action to tackle fuel poverty and associated challenges through a cooperative approach. The Herefordshire Affordable Warmth Strategy (<http://bit.ly/2mMsYrr>) includes an affordable warmth action plan and three key aims;

- To raise awareness of fuel poverty and affordable warmth among all stakeholders
- To encourage and support households to achieve affordable warmth;
- To develop sustainable strategies and delivery models via co-operation and evaluation.

1.3 Flexible Eligibility, the Energy Company Obligation and current activity to support fuel poor households contributes towards the following Herefordshire Health & Wellbeing strategic priorities:

- Priority Three- For older people – quality of life, social isolation, fuel poverty;
- Priority Four- Impact of housing – fuel poverty and poverty and the impact on health and wellbeing

In addition, Herefordshire Council's Corporate Plan 2016-20 seeks to;

- Enable residents to live safe, healthy and independent lives;

- Keep children and young people safe and give them a great start in life;
- Support the growth of our economy;
- Secure better services, quality of life and value for money.

1.4 Herefordshire Council continues to operate an energy efficiency and affordable warmth service called Keep Herefordshire Warm (KHW), in partnership with Severn Wye Energy Agency (SWEA).

1.5 Herefordshire Council's ambitions for Flexible Eligibility (FE) are:

- To maximise the uptake of cavity wall and loft insulation measures;
- To maximise the uptake of measures for off-gas properties especially electrically heated, oil and LPG and solid fuelled properties;
- To develop schemes to support off-gas park home residents;
- To develop schemes targeting hard-to-treat and in particular, solid walled properties;
- To develop other schemes as opportunities arise;
- Provide a route for the use of council capital funding contributions where, from time to time, these might be eligible.

2. Household eligibility

2.1 Keep Herefordshire Warm and the council will identify households that may benefit from the installation of measures under "flexible eligibility", i.e. households that are living in fuel poverty or living on a low income and vulnerable to the effects of living in a cold home as follows:

2.1.1 The ECO Flexible eligibility scheme is available to private sector households, including owner occupiers and private tenants, in line with the Government's guidance (ECO: Help to Heat Flexible Eligibility p1).

2.1.2 The council will assess eligibility based upon household income thresholds, house type and likely energy costs and health conditions (particularly those conditions exacerbated by living in a cold home).

Residents who are owner occupiers or private tenants will be eligible for Flexible Eligibility where they meet the following criteria:

- I. Low income, High Costs but not in receipt of benefits
- II. Low income and Vulnerability to Cold
- III. Dwelling Type
- IV. Solid Wall insulation (SWI) 'in-fill'

I. LOW INCOME + HIGH COSTS

Households must have an annual income under these thresholds **AND** an EPC rating of E, F, G (or equivalent) to be eligible.

Definition: Low Income thresholds (disposable income after paid rent or mortgage. All income from all sources savings and investments, pensions, all benefits incl. housing benefit).

Household composition		Number of Dependants				
		0	1	2	3	4
One Adult	Annual Net income	£10,000	£12,500	£15,000	£17,500	£20,000
	<i>Monthly equivalent</i>	£833.00	£1,042.00	£1,250.00	£1,458.00	£1,667.00
Two or more Adults	Annual Net income	£16,000	£18,500	£21,000	£23,500	£26,000
	<i>Monthly equivalent</i>	£1,333.00	£1,542.00	£1,750.00	£1,958.00	£2,167.00

AND

An **EPC OF E,F,G** (where there is no EPC rating for the property then use guidance below). Households that reach or exceed a score of **6** points will be deemed to be high cost.

Question	Response	Score
How many bedrooms are there in the home?	1	0
	2	1
	3	2
	4	3
What type of property is it?	Flat	1
	Mid Terrace	2
	Semi-detached/ End Terrace	3
	Detached House	4
	Park home	5
Was the home built before 1964?	Yes	1
	No	0
What is the main wall type	Solid - uninsulated	4
	Solid - insulated	0
	Cavity - not filled	4
	Cavity - filled	0
What is the main heating type?	Gas Central Heating	0
	Gas Room Heaters	2
	Oil/LPG	2
	Electricity	3
	Other	3
Heating system completely broken down?	Yes	6
	No	0

II. EXPANDED LOW INCOME + VULNERABILITY

Households must have an annual income under these thresholds **AND** a 'Vulnerability' (listed below) to be eligible.

Definition: Low Income thresholds (disposable income after paid rent or mortgage. All income from all sources savings and investments, pensions, all benefits incl. housing benefit).

The income threshold figures below are based on additional costs required for heating an inefficient property during the day and living with a health condition.

Household composition		Number of Dependants				
		0	1	2	3	4
One Adult	Annual Net income	£16,000	£18,500	£21,000	£23,500	£26,000
	<i>Monthly equivalent</i>	<i>£1,333.00</i>	<i>£1,542.00</i>	<i>£1,750.00</i>	<i>£1,958.00</i>	<i>£2,167.00</i>
Two or more Adults	Annual Net income	£22,000	£24,500	£27,000	£29,500	£32,000
	<i>Monthly equivalent</i>	<i>£1,833.00</i>	<i>£2,042.00</i>	<i>£2,250.00</i>	<i>£2,458.00</i>	<i>£2,667.00</i>

AND

Vulnerability defined as:	Aged over 65
	Children under 5 and pregnant mothers
	Respiratory disease (COPD, asthma)
	Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
	Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
	Substance misusers
	Dementia
	Neurobiological and related diseases (e.g. fibromyalgia, ME)
	Cancer
	Limited mobility
	Haemoglobinopathies (sickle cell disease, thalassaemia)
	Severe learning disabilities
Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)	

Exceptional cases, not meeting the requirements above, will be considered on a case by case basis.

III. DWELLING TYPE

Park homes located on the Fayre Oaks Home Park licensed residential site will be eligible regardless of income or receipt of benefit subject to a cost effectiveness assessment. The specific nature of this criterion is due to external funding restrictions.

IV. SOLID WALL INSULATION (SWI) “IN-FILL” PROJECTS

To increase the economies of scale of SWI projects, solid wall homes which are not ‘fuel poor’ will be eligible for Flexible ECO funding, where they are co-located with a minimum percentage of households assessed to be fuel poor or LIVC.

Criteria will be:

- Semi-detached houses/bungalows – at least 50% of properties in an SWI project must be FP or LIVC
- Same terrace – at least 66% off properties in an SWI project must be FP or LIVC
- Same building – at least 66% off properties in an SWI project must be FP or LIVC
- Adjacent properties - at least 66% off properties in an SWI project must be FP or LIVC

3. Governance

- 4.1 The Keep Herefordshire Warm service and relevant council officers will work with partners to identify and assess suitable households for inclusion within FE declarations to suppliers;
- 4.2 Herefordshire Council reports progress towards objectives through the Home Energy Conservation Act (HECA) report to the Department of Business, Energy and Industrial Strategy;
- 4.3 The Statement of Intent will be signed by the Director for Economy and Place Directorate at Herefordshire Council that oversees the Keep Herefordshire Warm Scheme.

Name: Richard Ball

Job title: Director for Economy and Place

- 4.4 The declaration of households who meet the council's agreed Flexible Eligibility criteria will be signed off in accordance with Herefordshire Council's Economy & Place Directorate scheme of delegation, principally these will be signed off by the lead officer for reporting against the Home Energy Conservation Act (HECA):

Name: Matthew Locking

Job title: Marches Sustainable Energy Project Manager

Email: mlocking@herefordshire.gov.uk

4. Referrals

- 4.1. Herefordshire Council and associated partners will identify eligible households through the Keep Herefordshire Warm Service. Householders may contact the advice line directly or be referred to the service from referral agencies (as currently).
- 4.2. Referrals will also be accepted from energy companies via Keep Herefordshire Warm and installers where there may be an opportunity for a householder to be Flexible Eligibility qualifying.

5. Evidence, monitoring and reporting

- 6.1 Data will be collected on each potential applicant in line with the Privacy Notice published in conjunction with this statement. Qualifying householders will be asked to give consent to be referred and that they agree to the terms and conditions and declare the information they have given regarding their eligibility to be true. This 'statement' is likely to be made over the phone but options to make it in writing or in person will also be available,
- 6.2 A data sharing agreement will allow data to be shared between Herefordshire Council, Marches Energy Agency (Keep Herefordshire Warm) and selected installer partners on a regular basis. A secured, online method for accessing data on past and ongoing referrals will be available to such partners.
- 6.3 Outcomes of Declarations made to installers will be available to the council using the data sharing procedure outlined above.
- 6.4 In order to monitor and audit the process, the council will trial a 1 in 3 of households to share evidence of their eligibility which will be reviewed in the view to moving to 100% auditing.

A high level of non-compliance in relation to these 'audits' will trigger a review of the Flexible Eligibility process. Those householders selected to provide evidence will be asked to share documentation regarding their income and health. Property type and 'high cost factors' will be assessed by installer partners.

Annex A includes a list of accepted documentation to help selected householders to provide the required evidence in relation to their application.

6. Signature



Richard Ball, Director for Economy and Place, Herefordshire Council

Annex A

1) **Proof of income and household makeup**

- PAYE employees - copy of a recent* payslip, or P60 if received within last 3 months.
- Self-employed – copy of recent* three line accounts or alternative document confirming net income. Must include the month, money earned, allowable expenses and net profit.
- Self-assessment – most recent tax assessment or set of accounts.
- Parental responsibility for children under 16 - copy of a passport; birth certificate; or Child Benefit award letter from the Child Benefit Office, showing your current address; or recent* bank statement showing payment of Child Benefit.
- Parental responsibility for children aged 16-19 in full time education – copy of acceptance on course of study or student financial support notice.

2) **Proof of receipt of benefits, tax credits and/or pensions**

- Copies of recent* slips or giro details showing amounts currently payable (in last 3 months); or
- Copies of recent* bank statements showing payments received; or
- Copies of recent letters from the DWP, HMRC or pension provider confirming the amounts currently payable.

3) **Proof of Disability/Illness Payments:**

- Copy of current sick certificate or MEDEX certificate or letter from your GP to confirm your condition. We cannot cover the cost of obtaining medical evidence.
- Copy of evidence of disability/illness payments such as recent* bank statements.

*Recent means **within last 3 months** with the exception of annual benefit letters for State Pension/ Works Pension/ Disability Living Allowance and Child Benefits.

Appendix 1 - Warmer Homes Herefordshire – Additional eligibility

Households that are located within the following 17 LSOA areas are also identified as households in fuel poverty as part of the 'Warmer Homes Herefordshire' Project.

Defined by the Local Authority as priority areas (*based on multiple data sources including IMD (inc. Health, Age, Income and condition of housing), distance to gas main, BEIS 2017 fuel poverty statistics, NEED data, BRE housing stock report*), a maximum no. of households (500) will qualify as part of the Warmer Homes Herefordshire programme (including urban and rural installs). Note priority will be given to community based off gas (>23m from gas main) schemes.

LSOA Code	LSOA Name	Ward Name
E01013986	Herefordshire 012A	College
E01013992	Herefordshire 017A	Newton Farm
E01014005	Herefordshire 005F	Bromyard West
E01014010	Herefordshire 012C	Central
E01014011	Herefordshire 012D	Central
E01014033	Herefordshire 006C	Kington
E01014034	Herefordshire 006D	Kington
E01014041	Herefordshire 002A	Leominster East
E01014042	Herefordshire 002B	Leominster North & Rural
E01014047	Herefordshire 003C	Leominster South
E01014048	Herefordshire 003D	Leominster East
E01014064	Herefordshire 022D	Ross North
E01014071	Herefordshire 017E	Red Hill
E01014072	Herefordshire 015C	Red Hill
E01014073	Herefordshire 015D	Saxon Gate
E01014074	Herefordshire 015E	Hinton & Hunderton
E01014086	Herefordshire 012E	Widemarsh