

Energy Company Obligation: Help to Heat
Local Authority Flexible Eligibility Statement of Intent

On behalf of Action on Energy Cambridgeshire including:

Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council and South Cambridgeshire District Council.

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1) Introduction

- 1.1. Fuel poverty in England is measured using the Low Income High Costs (LIHC) indicator, which considers a household to be fuel poor if: they have required fuel costs that are above average (the national median level); and were they to spend that amount, they would be left with a residual income below the official poverty line.¹
- 1.2. Nationally the 2015 figures for England estimate that 2.5 million households suffer from fuel poverty, 11% the total.² Living in a cold home doubles the risk of respiratory problems in children; increases the risk of minor illnesses; exacerbates existing conditions such as arthritis and is associated with 3 times the level of excess winter deaths as the warmest homes.³
- 1.3. Action on Energy Cambridgeshire is a collective of the city and district councils that work together for mutual benefit in addressing fuel poverty. We welcome the introduction of Flexible Eligibility as part of the Energy Company Obligation (ECO) as it will allow us to support additional vulnerable households under broader criteria.
- 1.4. Fuel Poverty is a serious concern in our county and affects over 19,000 households⁴ contributing to more than 800 Excess Winter Deaths on average each year.⁵ Although our collective actions helped reduce fuel poverty across the county by an estimated 1468 households from 2013-2015 however there is still more to be done.

¹ BEIS, Annual Fuel Poverty Statistics Report 2017, (2017) p.3

² Ibid

³ Marmot Review Team, The Health Impacts of Cold Homes and Fuel Poverty, (2011) p.9

⁴ <https://www.gov.uk/government/collections/fuel-poverty-sub-regional-statistics>

⁵ <http://fingertipsreports.phe.org.uk/health-profiles/2017/e10000003.pdf>

- 1.5. Each Local Authority within Cambridgeshire may have a specific area of concern; therefore our guidance must be broad enough to meet a range of priorities while maintaining focus on the fuel poor. For example, Cambridge City housing is characterised by large numbers of solid walled terraced units with a high percentage of younger people living in the Private Rented Sector.⁶
- 1.6. Action on Energy Cambridgeshire built a referral network and a range of contactors to procure from during our recent £7,857,400 Green Deal Communities project. We will expand this network in delivering ECO Flexible Eligibility and offer the highest quality at the best value we can to our residents.
- 1.7. Meeting the flexible eligibility criteria does not guarantee the installation of measures. The final decision will depend on:
- i. survey carried out by contractors and installation costs calculated;
 - ii. the energy savings that can be achieved for a property;
 - iii. whether suppliers have achieved their targets or require further measures to meet their ECO targets.

2) How we intend to identify eligible households

2a) ECO Flexible criteria eligibility

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:

- Income-based Jobseeker's Allowance (JSA)
- Income-related Employment and Support Allowance (ESA)
- Income Support (IS)
- Pension Credit (PC – all types)
- Universal Credit (UC – no income cap)
- Child Tax Credit (CTC – no income cap)
- Working Tax Credit (WTC – no income cap)
- Housing Benefit (HB)
- Council Tax Reduction (CTR - not where only 25% single occupant reduction applies)

Or a net annual household income of less than £20,000 for a single person, £30,000 for a couple and savings of less than £20,000.

⁶ ONS, 2011 Census: Key Statistics for England and Wales, Section 12: Accommodation and tenure

(Benefit letters must be provided as evidence; or 3 months bank statement(s) plus your latest tax return if self-employed. All pieces of evidence must be dated within 18 months before the completion of the measure. We require a copy of the evidence)

(B) High Cost:

- The property has an Energy Performance Certificate (EPC) rating of E, F or G dated with 10 years of the initial inspection *(EPC provided as evidence)*

OR (where EPC does not exist)

- The property reaches a total score of 20 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
What type of property is it?	Semi-detached	0
	Detached	6
	Mid terrace	-5
	End terrace	-2
	Flat / Maisonette	-20
	Flat unheated space below	-5
When was your house built?	Before 1930	22
	1930 - 1964	14
	1965 - 1981	6
	1982 or later	0
Does the home have central heating? (i.e. radiators and a boiler)	Yes	-10
	No	10
How is your main heating system powered?	Mains gas	-5
	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)	4
	Other (e.g. system build, concrete block, cob, park home)	15

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(Photos must be provided as evidence of the above)

(C) Vulnerable to Cold:

Eligible if:

- Receipt of Disability Living Allowance (DLA), Personal Independence Payment (PIP) or Attendance Allowance (AA) *(Benefit letters required as evidence)*

OR

- Where a resident is vulnerable if:
 - Pregnant *(Mat B1 letter)*
 - Children aged under 5 *(child's birth certificate / child benefit letter)*
 - Aged over 65 *(driving licence / passport / birth certificate)*

OR

- Has a health condition that can be exacerbated by the cold including:
 - Hospital admission due to a fall
 - Cardiovascular conditions (e.g. angina, stroke)
 - Respiratory conditions (e.g. COPD and asthma)
 - Musculoskeletal conditions (e.g. osteoarthritis, rheumatoid arthritis)
 - Neurological conditions (e.g. ME, fibromyalgia, dementia, multiple sclerosis)
 - Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)
 - Mental health conditions (e.g. depression, schizophrenia, bipolar disorder)
 - Disabilities (e.g. impaired mobility)
 - Terminal illness
 - Learning disabilities (e.g. downs syndrome)
 - Cancer
 - Haemoglobinopathies (e.g. sickle cell disease, thalassaemia)

(A letter from a medical professional - such as a report, care or treatment plan – will be required as evidence. Other cold related health conditions may be considered with a related medical letter. Please where possible only send copies of information you already have, and do not pay for new information)

2b) Solid Wall Insulation (SWI) “in-fill”

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). The in-fill criteria will be:

- Semi-detached houses/bungalows and buildings with 2 premises – at least 50% of properties must meet the fuel poor criteria (A+B or A+C)
- Same terrace – at least 66% of properties in an SWI project must meet fuel poor criteria (A+B or A+C)
- Same building – at least 66% of properties in an SWI project must meet fuel poor criteria (A+B or A+C)
- Adjacent properties - at least 66% of properties in an SWI project must meet fuel poor criteria (A+B or A+C)

(Photos must be provided as evidence)

3) Acting on behalf of another Local Authority:

In general practise it is the responsibility of the Local Authority where the applicant property resides to sign “Local Authority Declarations”.

However, when required, one of the Local Authorities may issue a declaration on behalf of another of the above named Local Authorities. In this case the declaration will include the name of the Local Authority upon which the decision is being made on behalf of.

4) Joint statement of intent

The Councils named below have all agreed to the same criteria as defined above. Cambridge City Council is acting as lead behalf of the Local Authorities including:

- Cambridge City Council
- South Cambridgeshire District Council
- East Cambridgeshire District Council
- Fenland District Council
- Huntingdonshire District Council

5) Governance

The below named representatives will have authority to sign-off Local Authority declarations on behalf of Action on Energy Cambridgeshire within their respective districts.

Declarations will also be signed by the officer who dealt with the application, and they will hold responsibility for obtaining the evidence requirement.

Local Authority	Authorised Signatory: Name / Position	Signature
Cambridge City Council	Justin Smith, Energy Projects Team Leader	

South Cambridgeshire District Council	Beverly Agass, Chief Executive Officer	
East Cambridgeshire District Council	Elizabeth Knox, Environmental Services Manager	
Fenland District Council	tbd	
Huntingdonshire District Council	tbd	

These representatives were designated at the time of the declaration.

6) Referrals

Action on Energy Cambridgeshire will receive referrals via established pathways from Local Authority officers, contractors and other frontline staff. This includes health and social care sectors, the voluntary sector and other agencies. Residents may also find compliant installers via the National Insulation Association website <http://www.nia-uk.org/consumer/>.

Targeting Referrals

Action on Energy Cambridgeshire may identify households using:

- EPC data
- Benefits data
- Index of Multiple Deprivation data
- GP referrals
- Non gas data
- Stay Well Group and other agency meetings
- Landlords association meetings

Referrals will also be encouraged through the Winter Warmth Campaign.

General Referrals

- Editorial in the Council's *Open Door and Cambridge Matters* magazines
- Articles in local newsletters
- Messaging via social media
- Contractors leafleting properties
- Community events and staff training

Other avenues for referrals may be used by Action on Energy Cambridgeshire as they become available.

7) Evidence, Monitoring and Reporting

- a) The following data will be collected and the mechanisms in place for monitoring the effective targeting of relevant households;
- Referral date
 - Reference number
 - Contractor
 - Name of resident
 - Address
 - Tenure
 - Survey date
 - Benefits
 - Income (where benefits unavailable)
 - EPC rating
 - Home survey score (where EPC unavailable)
 - Health condition
 - Measure
 - Grant
 - Full cost
 - Contribution amount
 - Contribution from
 - Installation date
 - Lifetime cost saving
 - Lifetime carbon saving

Records will be kept of all referrals and who receive a measure, and evidence must be provided by the households.

Progress will be part of the key performance indicators of the respective Councils Home Energy Conservation Act reporting among other requirements.

- b) Reporting will be based on the criteria outlined above with summary analyses and accompanying data.
- c) District reports are to be delivered quarterly at Action on Energy Cambridgeshire meetings.
- d) The respective Councils reserve the right to see survey details and perform quality assurance checks
- e) Eligibility will require a paper trail of documentation, for example benefits letters, quotations, invoices and photographic survey evidence.

Data Protection

The contractor(s) and Action on Energy Cambridgeshire will abide by the data protection act 1998. This will be set out in the Memorandum of Understanding or Service Level Agreement.

This Act requires the parties to respect principles of fair processing when handling personal information. The Act also guarantees individuals certain rights in relation to the processing of their data, including the right of access to personal records.

In May 2016, the UK government agreed to implement the new General Data Protection Regulation (GDPR). This will replace the existing Data Protection Act 1998 in May 2018, and the Local Authorities will then abide by GDPR.

Data will be stored for a minimum 6 year period by the respective Local Authorities in line with Ofgem guidance.

8) Signatures