



## Herefordshire Council

### Flexible Eligibility Statement of Intent Version 2

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#### 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, 13.5% of households live in Fuel Poverty, equating to around 11,043 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, in partnership with Marches Energy Agency (MEA) called Keep Herefordshire Warm (KHW).

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/savings 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. Solid Wall insulation (SWI) 'in-fill'

### 2.2 Referral into the Flexible Eligibility pathway

If a householder is:

- Not on an Affordable Warmth qualifying benefit (if they are they qualify through the Affordable Warmth route);
- Has a low income as established by 2.3 below **and** occupies a high cost household (resides in a property with an EPC band of E, F or G or scores 6 points plus as established by 2.4 below);

- Has a health issue exacerbated by a cold home as established by 2.5 below **and** a low income as defined in 2.3;
- Is an owner occupier or a private tenant;
- And is in need of a measure available through the Energy Company Obligation.

Then they will form part of a Declaration and will be passed across to the Keep Herefordshire Warm delivery partner for assessment of measures to be installed.

### 2.3 Criteria for identifying household income

If the annual household income after housing costs is below £23,000, then the household qualifies as being 'low income'. If household savings are £8,000 or more (single person household) or £12,000 or more (multiple person household) applicant will not be eligible for flexible eligibility criteria.

### 2.4 Criteria for identifying high cost households

A household will be defined as living in a high cost home, should they reside in a property with an Energy Performance Certificate (EPC) rating of E, F or G.

Should no EPC be available, the following questions will be used to establish directly with the householder whether the household has high energy costs or not.

Question	Response	Score
How many bedrooms are there in the home?	1	0
	2	1
	3	2
	4	3
	5 or more	4
What type of house is it?	Flat	1
	Mid terrace	2
	Semi-detached / End terrace	3
	Detached	4
	Park Home	5
Was the home built before 1964?	Yes	1
	No	0
What is the main heating fuel?	Gas Central heating	0
	Gas room heaters	2
	Oil/LPG	2
	Electricity	3
	Other	3
What is the main wall type?	Solid - uninsulated	4
	Solid - insulated	0
	Cavity – not filled	4
	Cavity - filled	0

A household will be assessed to be a high cost household if achieving a score in excess of **6 points**.

## 2.5 Criteria for identifying vulnerability to cold

The Council will identify households that are vulnerable to the effects of a cold home where one or more member:

- Has a limiting long term or terminal illness affected by cold (see annex for list of qualifying conditions)
- Has a disability
- Is over 60 years of age
- have dependent children of 5 years or under
- is pregnant

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

### **Note on Solid Wall (SW) properties**

To increase economies of scale, SW projects which are not deemed 'fuel poor' will be deemed to be eligible for support where they are co-located with a minimum percentage of households deemed to be fuel poor (FP) or low income and vulnerable to the effects of living in a cold home (LIVC).

#### **Criteria will be:**

Semi-detached houses/bungalows – at least 50% of eligible properties must be fuel poor or LIVC

Same building – at least 66% of properties must be FP or LIVC

Same terrace – at least 66% of properties must be FP or LIVC

### **3. Acting on behalf of another local authority**

This is currently not applicable.

### **4. 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

### **5. Marketing & Referrals**

- 5.1. 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).
- 5.2. 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.
- 5.3. General marketing includes:
  - Information on the Council's website and associated social media;
  - Direct mail outs addressed to eligible / target households;
  - Articles in local newsletters with a community following, such as parish council or privately run village or town newsletters;
  - Emails to households who have previously contacted Keep Herefordshire Warm and asked to be kept informed of new offers;
  - Through home energy advice visit programmes (e.g. Age UK Home Energy Checks Programme);
  - Phone calls to householders who have previously engaged with Keep Herefordshire Warm and wished to be updated on new funding options;
  - Local councillor supported messages on twitter or in newsletters
  - Delivery partner leafleting to properties near those with installations being carried out;
  - Leaflets in community venues;
  - Tweets from @MarchesEnergy and other council twitter and Facebook pages.
  - Stalls at libraries or community events.
- 5.4. In order to target its marketing towards those households that are vulnerable to the effects of cold, on low income, in high energy cost properties, the council will:
  - Work closely with Public Health to identify routes to vulnerable households such as flu vaccine marketing;
  - Engage GP practices;
  - Regularly engage with and update all members of the Herefordshire Affordable Warmth Network;
  - Carry out briefings for frontline council staff and other agencies to encourage referrals, including housing and environmental health staff, health and social care workers, you@home, Age UK , Hereford and Worcester Fire and Rescue Service and other third sector organisations;
  - Target promotional material to homes where income, property and health data indicate the householders may be eligible, such as:
    - [www.epc.opendatacommunities.org](http://www.epc.opendatacommunities.org)
    - MOSAIC – which provides geographical income data at postcode level.
    - Working with the council's Housing and Health Plan Group to assess appropriate data sets to assist in householder targeting.

## **6. 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 B includes a list of accepted documentation to help selected householders to provide the required evidence in relation to their application.

## **7. Signature**



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Richard Ball, Director for Economy and Place, Herefordshire Council

## Annex A

### List of Cold-related Illnesses (not an exhaustive list)

- Respiratory conditions - e.g. COPD, emphysema, chronic bronchitis, severe asthma.
- Cardiovascular conditions - e.g. coronary heart disease, stroke or mini strokes (transient ischemic attacks).
- Diabetes (particularly Type 1).
- Musculoskeletal conditions - e.g. arthritis (osteo and rheumatoid, requiring regular treatment and review), chronic fibromyalgia.
- Neurological conditions – e.g. dementia, Parkinson’s disease, Multiple Sclerosis, trigeminal neuralgia, Chiari malformation.
- Terminal illnesses such as motor neurone disease
- Mental illness – e.g. depression and receiving treatment, schizophrenia, bipolar disorder.
- Reduced mobility (risk of trips, slips & falls)
- Cancer
- Severe head injuries resulting in disabilities.

## Annex B

List of accepted documentation in evidence of Householder eligibility

### 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.