



Herefordshire Council

Flexible Eligibility Statement of Intent Version 1

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1) Introduction

- 1.1 Herefordshire Council welcomes the new 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.
- 1.2 Fuel Poverty remains a major issue in Herefordshire. According to the latest statistics, 15.1% of households live in Fuel Poverty, equating to around 12,000 homes. Fuel Poverty is prevalent across much of the county, particularly in rural areas such as the Golden Valley and Weobley. The larger cities and towns within the County also have significant numbers of fuel poor households, including Hereford, Leominster and Ross-on-Wye.
- 1.3 Herefordshire, as a large rural county, faces exceptional challenges in relation to the age and type of housing, the availability of mains gas, and the population profile. From an estimated 82,521 domestic dwellings in Herefordshire, 20.5% of homes were built before 1919. Mains gas is available to only 69.4% of properties, compared to 87% nationally. Of vulnerable households in Herefordshire, 25.5% inhabit dwellings classified as 'non-decent' under the Decent Homes Standard, 33.0% of whom live in pre-1919 homes and 23.2% of whom live in properties with a SAP rating of below 55 (band E).
- 1.4 Herefordshire Council and its partners continue to work hard to enable effective action to tackle fuel poverty and associated challenges through cooperative approaches. 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

1.5 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

1.6 Herefordshire Council continues to operate an energy efficiency and affordable warmth service, in partnership with Marches Energy Agency (MEA). The Keep Herefordshire Warm (KHW) service has been operated since 2014 and provides affordable warmth advice and support, primarily to vulnerable households. The service includes a Freephone advice line (0800 677 1432) and also offers advice through community events and other avenues of support. KHW commissions and works with a range of installers and contractors to maximise the uptake of energy efficiency measures in the county, particularly through ECO. The scheme also helps to deliver Local Authority grants as and when available. In the financial year of 2016/17, Keep Herefordshire Warm directly supported Xx vulnerable households and delivered local authority capital funding of £9,300, which in turn leveraged in circa £18,000 of external funding.

1.7 Under the umbrella of Keep Herefordshire Warm, MEA also facilitate the Herefordshire Affordable Warmth Network (HAWN). The network brings together key public, community and voluntary sector partners to better enable effective action to tackle fuel poverty and excess winter deaths through shared learning and experience, coordinated delivery and support.

1.8 The Council aspires to continue to utilise the current Keep Herefordshire Warm advice and support service to market ECO grants and energy efficiency works to vulnerable Herefordshire residents. This includes existing frameworks and procurement approaches to help deliver measures and additional activity. The eligibility of each household (as outlined below) will be assessed through the KHW service.

1.9 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 properties, particularly solid walled properties

- To develop other schemes as opportunities arise
- Provide a route for the use of Local Authority capital funding contributions where, from time to time, these might be eligible.

The following tables indicate the size and scale of the Flexible Eligibility opportunity within Herefordshire.

Indicators of an energy efficient home (high cost home)	
No. F and G rated Properties	6,775
No. Solid Walled Properties	25,329
No HH's off the gas network	41,964
No. Electrically heated properties	7,215

Sources; 2011 Census Data, EPC register Data (April 2017) and Non Gas Map (2017)

Perceived Vulnerability to the cold (Determined from health conditions)	
COPD	3,921
Asthma	11,510
Atrial Fibrillation	4,198
Coronary Heart Disease	6,386
CVD – Primary Prevention	1,250
Heart Failure	1,873
Hypertension	29,642
Peripheral Arterial Disease (PAD)	1,309
Stroke or TIA	4,159
Muscular Skeletal Condition	286
Dementia (POPPI 2014)	1,615
Cancer	5,850
Mental Health Adult Service User	3,915

Income Status, susceptibility to Fuel Poverty	
Total number of HH's	79,154

Estimated number of Fuel Poor HH's	11,952
Percentage of Fuel Poor HH's	15.1%
Average Earnings (p.a)	
No. HH's with income less than £20,000	
No. Children in low income HH's	4,300 (14%)
No. HH's reciving free school meals	
No. Pension credit claimants	

Sources:

2.0 Household eligibility

2.1 ECO Flexible eligibility 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).

2.2 The Council and associated partners 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:

2.3 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).

2.4 Criteria for identifying household income

The following questions will be used to establish directly with the householder whether their household is classified as low income.

Question 1: How many people over the age of 18 normally live in your property, including yourself?

Question 2: How many people under the age of 18 normally live in your property?

Question 3: After paying the rent or mortgage (if you have one), how much income does your household usually have left each month? The table below will be used as a guide to informing whether a household qualifies or not.

Household composition	Annual household income	Monthly household income Equivalent
1 adult	£8,300	£690
and 1 child	£11,000	£920

and 2 children	£13,500	£1,130
and three children	£16,200	£1,350
and four or more children	£18,800	£1,570
2 adults	£13,700	£1,140
and 1 child	£16,300	£1,360
and 2 children	£18,900	£1,580
and three children	£21,600	£1,800

Question 4: How much savings do you have? (If household savings are £8000 or more (single person household) or £12000 or more (multiple person household) applicant will not be eligible for flexible eligibility criteria.

2.5 Criteria for identifying high cost households.

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	10
	3	35
	4	55
	5	70
	6 or more	80
Are energy payments made by Direct Debit?	Yes	0
	No	15
What type of house is it?	Semi detached	30
	Terrace	20
	Flat	0
	Detached	30
What is the tenure?	Private rented	15
	Owner occupied	0
	Registered Social Landlord	0
	Local Authority	0
Does the home use a boiler?	Yes	0
	No	5
Was the home built before 1964?	Yes	25
	No	0
What is the main fuel type?	Gas	0
	Electricity	30
	Other	15

A household will be assessed to be a high cost household if achieving a score in excess of **50 points**.

2.6 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
- who have dependent children of 5 years or under

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

2.6 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 2.4 above,
- occupies a high cost household (scoring 50 points plus as established by 2.5 above)
- has a health issue exacerbated by a cold home as established by 2.6 above
- Is an owner occupier or a private tenant
- And is in need of a measure available through ECO2 (t).

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.

3.0 Acting on behalf of another local authority

This is currently not applicable.

4.0 Governance

- 4.1 The Keep Herefordshire Warm service is monitored and evaluated by an Affordable Warmth Steering Group, chaired by Matt Locking, Energy Strategy Officer. The group oversees the services provided by Keep Herefordshire Warm and other associated projects. The steering group is comprised of various Council departments including Environmental health, Public Health, The Council's Home Improvement Agency and Marches Energy Agency (as the contracted party delivering the Keep Herefordshire Warm service). The steering group;

- Take an overview of the project and assess performance against agreed targets
- Link activity to the Council's affordable Warmth Strategy and Action Plan.
- Promote joint working amongst the various affordable warmth stakeholders
- Understand and promote key messages

4.2– Herefordshire Council reports progress towards objectives through the Home Energy Conservation Act (HECA) reports (see Link to latest HECA) and an Interim 'Affordable Warmth Strategy Update' report .

4.3 The declaration of households who meet the Council's agreed Flexible Eligibility criteria will be signed off by an appropriate senior officer.

5.0 Marketing & Referrals

5.1 Herefordshire Council and associated partner 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).

Referrals will also be accepted from energy companies and installers where there may be an opportunity for a householder to be FE qualifying.

5.2 General marketing includes:

- advertising or editorial in the Council's magazines to residents
- 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

5.3 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 mail outs to homes where income, property and health data indicate the householders may be eligible, such as:
 - 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.

Evidence, monitoring and reporting

6.1 Data will be collected on each potential applicant through the governance processes described at paragraph 4 above. 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 ask a proportion (at least 25%) of households to share evidence of their eligibility at the time of their application. 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 households to provide the required evidence in relation to their application.

5.0 Signature

The Sol should be signed by the Chief Executive Officer for Herefordshire Council or other senior officer nominated on their behalf who is at least at Director Level.

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.

Further Information

How does the cold affect people with some of these conditions?

Respiratory conditions - *Asthma is a lung complaint that narrows the airways, making breathing difficult. Bronchitis is an infection of the bronchi usually caused by a viral infection; the common cold can sometimes lead to bronchitis in people whose lung resistance levels are low, such as smokers or asthmatics. Cold and damp weather may instigate attacks, or make breathing more difficult. The drying effect of central heating and efficient insulation may also contribute.*

Cardiovascular conditions - *cold weather can constrict blood vessels, increase heart rate and blood pressure, making the heart work much harder to keep the body warm and causing changes to the blood that can increase the risk of developing blood clots and lead to heart attack and strokes/mini strokes.*

Neurological conditions - *increased sensitivity to heat or cold due to the nervous system not functioning as it should. Some conditions such as dementia may result in a reduced ability to respond to cold weather changes such as increasing the heating or putting on more layers.*

Musculoskeletal conditions – *often related to wear and tear in joints causing pain in fibrous tissues, muscles, tendons, and other connective tissues. Cold, damp weather can increase joint stiffness or cause joints to swell or contract exacerbating pain.*

Mental Health / Illness - *can often impact how an individual interacts with their environment. This could lead to (for example) underheating, poor control of temperature or lack of recognition of link between cold home and ill health. In addition, some mental illnesses like depression can be just one part of other issues (debt, insecurity, poverty etc).*

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.

Notes:

1) *Household income is the total before tax and National Insurance are deducted (gross income). It includes: War Disablement Pension, Disablement Pension Allowance and Working Tax Credit. It excludes: Council Tax Benefit, Housing Benefit, Attendance Allowance, Disability Living Allowance or PIP, Child Benefit and Child Tax Credit.*

2) *Eligible benefits include:*

- *Income support*
- *Income-based Employment and Support Allowance (not contribution-based ESA)*
- *Income-based Jobseeker's Allowance (not contribution-based JSA)*
- *Guarantee Pension Credit (not Savings Pension Credit alone)*
- *Housing Benefit (including a rent allowance paid under Local Housing Allowance scheme)*
- *Working Tax Credit and/or Child Tax Credit if annual income less than £15,050*
- *any amount of Universal Credit.*