

## Energy Company Obligation: Help to Heat

### Local Authority Flexible Eligibility Statement of Intent

**Local authority:** West Devon Borough Council and South Hams District Council

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#### 1. Introduction

West Devon Borough Council and South Hams District Council welcomes the introduction of Flexible Eligibility (FE) and intends to utilise it for the purposes of reducing fuel poverty in the borough.

	South Hams	West Devon
Regional Average	12.2%	
Number of households	5113	3622
Percentage of households	13.2%	15.2%

(Government statistics)

Fuel poverty is more prevalent in groups with low household incomes, including pensioners, benefit recipient, and working families with below average incomes. Fuel poverty is highest and has increased fastest, in the most deprived areas. The low wage economy, particularly in West Devon and higher living costs contribute further to levels of fuel poverty.

The council runs a number a loan schemes, as well as being a part of Devon-wide schemes and initiatives to tackle fuel poverty and improve housing conditions for those who are particularly vulnerable to the cold in the private sector. One of the primary objectives of Environmental Health is to remedy category 1 hazards, excess cold being one which is particularly focused on and is the result of lack of heating and insulation. West Devon Borough Council and South Hams District Council will take advantage of this new Flexible Eligibility scheme so that as many residents can benefit as possible, and so that those who don't qualify through existing schemes but are in fuel poverty can obtain financial help to install key energy measures. The council's existing grant schemes can also be accessed by residents who are eligible for Ecoflex but where there is a shortfall in grant funding.

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 will not guarantee installation of measures. The final decision will depend on:

- i) identification of measures eligible under Help to Heat ii)
- 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 West Devon Borough Council and South Hams District Council is seeking to enable residents to benefit from funding and will seek the consent of households to including them in a Declaration. West Devon Borough Council and South Hams District Council expects any obligated energy supplier, or contractor working on their behalf, comply with 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 a separate memorandum of understanding between the Council and the obligated party.

## **2. How West Devon Borough Council and South Hams District Council intends to identify eligible households**

The Councils recognise that the community sector is an important partner when improving fuel poverty. Therefore the Councils will be looking to use existing links with the local groups/organisation to identify residents in fuel poverty. The Councils will also use/cross reference existing datasets including EPC/rental deposits and benefit recipients taking into account data protection restrictions. We will also target those most in need having regard to BEIS guidance on targeting, including:

### **a. Identifying fuel poverty**

Private homeowners qualify to apply through ECO flexible eligibility subject to meeting category 1 and category 2 eligibility criteria below\*:

#### **Category 1**

For the 'low income' portion of this indicator, the referring agency will look to find evidence that a member of the household is in receipt of an ECO qualifying income-related benefit in the first instance. Should the resident not receive any ECO qualifying income-related benefits, then the referring agency will consider a household in receipt of Council Tax

Benefit, Housing Benefit, or with a household income of less than £35,000 after paying for rent or mortgage, council tax and energy costs to be 'low income' for the purposes of this criteria.

## Category 2

For the 'high cost' portion of the indicator, the referring agency, will look to identify eligible households as those that have an **Energy Performance Certificate (EPC) rating of 'D' or lower**. These properties will be identified using the Landmark online EPC register. In the event that a property does not meet this criteria or does not have an EPC, the referring agency will identify if the property falls into one of these additional categories which have been selected due to their high energy bills, hard to treat and hard to reach nature:

- Park homes and other permanent caravan residences (regardless of income)  
Privately rented properties (regardless of income) including Houses in Multiple Occupation (HMOs).
- Properties heated by a fuel other than mains gas
- Flats above commercial premises
- System built properties
- Sheltered housing for the elderly
- Homes which require cavity wall insulation
- Homes with require a loft insulation top up
- Homes which require solid wall insulation
- Homes with a boiler which meets the ECO Qualifying Boiler criteria

### b. Identifying low income and vulnerability to cold

West Devon Borough Council and South Hams District Council will target households containing people with the following characteristics, which reflects the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess winter deaths and illness caused by cold homes and who meet low income household eligibility.

- i. Aged over 60, and particularly those over 75
- ii. Householders with children under 16
- iii. Pregnant women
- iv. Respiratory disease (COPD, asthma)
- v. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- vi. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
- vii. Substance misusers

- viii. Dementia
- ix. Neurobiological and related diseases (e.g. fibromyalgia, ME)
- x. Cancer
- xi. Limited mobility
- xii. Haemoglobinopathies (sickle cell disease, thalassaemia)
- xiii. Severe learning disabilities
- xiv. Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)
- xv. Anyone else who has a health condition which is made worse by the cold

### **Solid wall insulation “in-fill” projects**

Where potential works have been identified households will be supported to take advantage of “in-fill” projects where the minimum number of vulnerable households is met. Reference will be made to the guidance.

### **3. Governance**

#### **Responsible officer**

The officer below will be responsible for signing Declarations on behalf of the local authority.

David Sexton

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### **4. Referrals**

West Devon Borough Council and South Hams District Council will ensure that referral processes used comply with data protection. Initially referrals will be made as a result of identifying eligible households using the Home Analytics Database. People will also be referred via the Local Energy Advice Programme (LEAP) and local community groups. The council will also identify households through analysing EPC data. Contact will be made with those who applied through previous energy schemes but were unsuccessful due to ineligibility, i.e. the Central Heating Fund will also be targeted and referred. We will also work with partner services and organisations, i.e. South Hams & West Devon Citizens Advice, South Dartmoor Community Energy, Tamar Energy Community, Devon DARE to

determine those that may be vulnerable and those with health conditions. We will also target people who are in receipt of disability/carers benefits who have been means tested in the past.

Eligible households will also be identified through routine inspections which officers in housing services carry out. Private tenants and private homeowners will be identified and referred to the scheme.

Low income households living in energy inefficient housing will be identified in the private rented sector through enforcement activity under the Housing Act 2004 and landlord associations/forums.

## **5. Evidence, monitoring and reporting**

- a. Anonymised data on the characteristics of households reached through Flexible Eligibility will be reviewed.
- b. The data above will include details of households assessed, how many were deemed eligible and ineligible, and how many received heating and insulation improvements.

## **6. Signature**



West Devon Borough Council and South Hams District Council