



Stafford Borough Council

**Flexible Eligibility Statement of Intent
Version 2**

Published 1st November 2018

Available online on the Stafford Borough Council website

<http://www.staffordbc.gov.uk/warmerhomes>

1 Introduction

- 1.1 The Energy Company Obligation (ECO) is an obligation on energy suppliers aimed at helping households cut their energy bills and reduce carbon emissions by installing energy saving measures.
- 1.2 The Home Heating Cost Reduction Obligation (HHCRO) and Carbon Emissions Reduction Obligation (CERO) elements of ECO restrict financial assistance for measures to households in receipt of certain benefits or for certain measures (See Appendix 1). This often excludes households who may still be in fuel poverty but whose income takes them just above the benefit eligibility level.
- 1.3 The most recent version of ECO allows energy suppliers to achieve up to 10% of their HHCRO obligation by installing energy saving measures to the homes of households declared eligible by Local Authorities (LAs). This new mechanism, known as “Flexible Eligibility”, allows LAs to make declarations determining that certain households meet their eligibility criteria for a measure under the Affordable Warmth element of ECO in their area.
- 1.4 This Statement of Intent sets out how Stafford Borough Council proposes to use the Flexible Eligibility element of the Energy Company Obligation to support and assist fuel poor households and those at risk from cold homes.
- 1.5 Fuel Poverty is a significant issue in Stafford Borough, with 11% of the population (6,212 households) believed to be affected.
- 1.6 The issues are not uniform across the Borough; older, less efficient properties and a lack of access to mains gas are a key driver of high fuel poverty rates in rural parts of the Borough, particularly areas surrounding Eccleshall and Gnosall. Urban areas such as Holmcroft and Littleworth within the Stafford town area experience high levels of fuel poverty characterised by hard-to-treat, energy inefficient housing and lower incomes.

- 1.7 Tackling the negative effects of fuel poverty and cold homes remains a key priority for the Council and will contribute to our objective “To improve the quality of life of local people by providing a safe, clean, attractive place to live [...]” as identified in the Corporate Plan 2018-2021. It is also a key priority within the “Age Well” theme of the Stafford and Surrounds Health and Wellbeing Strategy 2015-2020.
- 1.8 Stafford Borough Council operate an energy efficiency and affordable warmth service for all residents known as Warmer Homes Stafford (0800 677 11785 or www.warmerhomesstafford.org.uk).
- 1.9 This has been in operation since 2014 and provides advice and support, primarily to vulnerable households who may be at risk from the cold. As well as a freephone advice line, Warmer Homes Stafford can offer home visits, community events and training to frontline workers. The service is currently managed by Marches Energy Agency (www.me.org.uk) who also procure and work with a range of installers and contractors to maximise the uptake of energy efficiency measures in the Borough. Additional grant funded programmes are also delivered through Warmer Homes Stafford.
- 1.10 A wide range of partner organisations engage regularly with Warmer Homes Stafford including other Council departments, health agencies and voluntary sector partners. Partners signpost and refer individuals and households for support across a wide range of services.
- 1.11 It is the Council's intention to continue to use Warner Homes Stafford to help residents of the Borough access energy efficiency measures and support, through the Energy Company Obligation. This includes the use of existing installer relationships and frameworks in relation to the delivery of energy efficiency measures.
- 1.12 The Council believes ‘Flexible Eligibility’ can play an important role in tackling fuel poverty and improving energy efficiency across the Borough. In particular, the Council is keen to use Flexible Eligibility to;
- maximise the uptake of cavity wall and loft insulation measures;
 - maximise the uptake of measures for off-gas properties, including assistance to households with LPG, oil and solid fuel heating systems
 - assist residents with hard to manage and inefficient electric heating systems
 - assist residents with non-programmable heating systems
 - help develop schemes targeting insulation at hard-to-treat properties, particularly solid walled properties
 - develop other schemes as opportunities arise, including support for park home sites
 - provide a route for the use of Local Authority capital funding contributions where, from time to time, these might be eligible through the Council's Assistance Policy.

2 Household eligibility

2.1 In accordance with Government Guidance (ECO: Help to Heat Flexible Eligibility¹), the Flexible Eligibility scheme will be available to private sector households only (owner occupiers and private tenants).

2.2 The Council and its partners will identify households that may benefit from the installation of measures under Flexible Eligibility, i.e. households that are in fuel poverty or on a low income and vulnerable to the effects of living in a cold home.

2.3 The Council, supported by Marches Energy Agency, will assess eligibility based upon household income/savings thresholds, house type and likely energy costs and health conditions (with a particular emphasis on health conditions that can be exacerbated by living in a cold home).

2.4 Criteria for identifying household income

A household will be considered to be low income if income after housing costs is **below £21,000**.

This is based upon the median after housing costs income outlined in the Annual Fuel Poverty Statistics Report, 2016.

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.

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.

¹ <https://www.gov.uk/government/publications/energy-company-obligation-eco-help-to-heat-scheme-flexible-eligibility>

Question	Response	Score
How many bedrooms are there in the home?	1	0
	2	10
	3	17
	4	27
	5 or more	36
	No response	17
Are energy payments made by Direct Debit?	Yes	-7
	No	0
	No response	-7
What type of house is it?	Semi detached	-4
	Detached	6
	Mid terrace	-10
	End terrace	-4
	Converted flat	-9
	Purpose built flat, high rise	-20
	Purpose built flat, low rise	-34
	Bungalow	0
	No response	-4
Was the home built before 1964?	Yes	17
	No	0
	No response	17
What is the main heating fuel?	Gas	-14
	Electricity	0
	Oil	12
	Other	-10
	No response	-14
Does at least one member of the household spend most of the day in the home?	Yes	1
	No	0
	No response	0

A household will be considered to be a high cost household if achieving a score in excess of **5 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 A for a list of qualifying conditions)
- Is registered disabled
- Is over 60 years of age
- Has responsibility for a child (or children) aged 5 years or younger
- Is pregnant

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

2.7 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 of ECO)
- has a low income as established by 2.4 above,
- resides in a high cost household, a property with an EPC of E, F or G or scoring 5 or more points as by the table at 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
- Is in need of a qualifying energy efficiency measure available through ECO (e.g. loft insulation or boiler replacement).

Stafford Borough Council can then make a declaration to state that the householder qualifies for funding via our Flexible Eligibility criteria.

This declaration will then be passed to a Warmer Homes Stafford delivery partner for expected delivery of the measure(s) required.

3 Acting on behalf of another local authority

Not applicable.

4 Joint Statement of Intent

Not applicable

5 Governance

5.1 Warmer Homes Stafford is a scheme managed by Stafford Borough Council to tackle cold homes and fuel poverty in the Borough. Marches Energy Agency have been contracted to deliver the scheme on behalf of the Council and provide regular performance information based on a schedule of Key Performance Indicators. Progress towards corporate targets is reported quarterly to a Scrutiny Committee.

5.2 Stafford Borough Council reports progress towards its various energy and carbon reduction objectives through the Home Energy Conservation Act (HECA) reports.

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

6 Marketing & Referrals

6.1 Stafford Borough Council and associated partners will seek to identify eligible households through the Warmer Homes Stafford service. Householders may contact the advice line directly or be referred to the service from referral agencies (as is current practice).

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

6.3 Warmer Homes Stafford general marketing approaches include:

- 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 Warmer Homes Stafford and clients who have asked to be kept informed of new offers

- Phone calls to householders who have previously engaged with Warmer Homes Stafford and wished to be updated on new funding options
- Local councillor supported messages on twitter or in newsletters
- Leafleting to properties near those with installations being carried out
- Leaflets in community venues
- Tweets from @marchesenergy @warmerhstafford and other Council twitter feeds.
- Through an ongoing programme of Warmer Homes Stafford Community Events

- 6.4 To better target promotional efforts, Stafford Borough Council will seek to target promotion to those that meet the required criteria, by;
- working closely with Public Health colleagues to identify routes to vulnerable households such as flu vaccine marketing and attendance at flu jab clinics
 - engaging with GP practices across the Borough.
 - undertaking briefings for frontline Council staff and other agencies to encourage referrals, including housing and environmental health staff, health and social care workers, Age UK , Fire and Rescue Service and other relevant third sector organisations
 - Working with the Stafford Community Wellbeing Working group
 - Targeting mail outs to homes where income, property and health data indicate the householders may be eligible by using relevant council held data sets
 - Using the Councils BRE stock modelling work and EPC data

7 Evidence, monitoring and reporting

- 7.1 Data will be collected on each potential applicant through the governance processes described at paragraph 5 above. Qualifying householders will be asked to give consent to be referred and that they agree to the terms and conditions, at the same time declaring that the information they have given regarding their eligibility to be true at the time. This 'statement' will in most cases be made over the phone, however, options to make the statement in writing or in person will also be available.
- 7.2 A data sharing agreement will allow data to be shared between Stafford Borough Council, Marches Energy Agency (as scheme managers of Warmer Homes Stafford) and selected installer partners / energy companies on a regular basis. A secured, online method for accessing data on past and ongoing referrals will be available to such partners and has been used on previous Warmer Homes Stafford led projects.
- 7.3 Through the data sharing agreement above, the Council will have access to records on the outcomes of the declarations made.
- 7.4 In order to monitor and audit the process, the Council may ask a proportion (at least 20%) of households to share evidence of their eligibility. 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.

8 Signature



Name: Anna Nevin

Post: Health and Housing Manager

Date: 1st November 2018

This document has been superseded

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.*