

## **Energy Company Obligation: Help to Heat**

### **Local Authority Flexible Eligibility Statement of Intent**

**Local authority:** Royal Borough of Windsor and Maidenhead

**Date of publication:** 28/08/2019

**Version:** Version 1.0

#### **1) Introduction**

Royal Borough of Windsor and Maidenhead welcomes the introduction of Flexible Eligibility (FE). The scheme will be utilised for reducing fuel poverty and targeted at those suffering from long term health conditions exacerbated by living in a cold and/or damp home or on a low income living in a poorly rated energy inefficient dwelling.

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) 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 the Royal Borough of Windsor and Maidenhead is seeking to enable residents to benefit from funding and will seek the consent of households to include them in a Declaration. The Royal Borough of Windsor and Maidenhead 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 Royal Borough of Windsor and Maidenhead intends to identify eligible households**

##### ***2(a) Criteria for identifying 'Living in fuel poverty, but not in receipt of benefits' (Fuel Poor or "FP")***

Fuel poverty is defined as living with low income but high heating costs. The Royal Borough of Windsor and Maidenhead will assess two elements to determine eligibility:

- i) For the 'low income' portion of this indicator, the referring agency, Heat Berkshire, will look to find evidence that a member of the household is in receipt of an ECO qualifying benefit in the first instance. Should the resident not receive any ECO qualifying benefits, we will consider a household in receipt of Council Tax Benefit, Housing Benefit, or with an income of less than £35,000 after tax and after paying for housing and utility costs, to be 'low income' for the purposes of this criteria.
- ii) For the 'high cost' portion of the indicator, we 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, we 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*
  - ✓ *Privately rented properties including 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 which require a loft insulation top up*
  - ✓ *Homes which require solid wall insulation*
  - ✓ *Homes with a broken heating system which meet the ECO Broken Heating criteria*
  - ✓ *Homes which require connection to the mains gas network to enable a wider gas mains upgrade programme, regardless of income (subject to 50% of homes meeting the eligibility criteria - infill) where the scheme would not be financially viable to go ahead without the inclusion of all properties*

### **Notes regarding our income threshold**

The Royal Borough of Windsor and Maidenhead has seen historically low levels of take up of ECO, at the date of issuing this statement of intent, only 38.9 homes per thousand have benefited from an ECO measure, ranking the Borough as the 47<sup>th</sup> out of 67 councils in the southeast region in terms of ECO take-up, and being almost half the average across Great Britain (75.7/1000 homes). The Borough has fared far worse for take up of measures for the Affordable Warmth group customers (HHCRO), with only 5.8 grants per thousand homes, compared to the British average of 33.3 grants per thousand homes. It is therefore important to offer a simple set of criteria, that is easy for residents to understand, and to keep the marketing message straightforward, to maximise take-up for those most at need in the Borough. The income level has been selected to reflect this, and has been set at such a level that reflects the high cost of living that the residents have, in a Borough, which has areas of wealth, but which also masks hidden pockets of deprivation within. The income level has also been set to align with income levels of neighbouring boroughs, to ensure that a consistent approach is taken for joined up

activities, including a recent successful multi-borough bid for funding from the Warm Homes Fund.

## **2(b) Criteria for identifying 'low income and vulnerability to cold' (LIVC)**

The Royal Borough of Windsor and Maidenhead will assess two combined elements to determine eligibility:

1. The 'low income' portion of this identifier as set out in the previous section for 'fuel poverty'
2. Identifying low income and vulnerability to cold

Royal Borough of Windsor and Maidenhead will target households containing people with the following characteristics, which in part reflects the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess winter deaths and illness caused by cold homes:

- i. Aged over 65
- ii. Children under 5
- iii. Pregnant women
- iv. People with disabilities
- v. Respiratory disease (e.g. COPD, asthma)
- vi. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- vii. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
- viii. Substance misusers
- ix. Dementia
- x. Neurobiological and related diseases (e.g. Fibromyalgia, ME)
- xi. Cancer
- xii. Limited mobility
- xiii. Haemoglobinopathies (sickle cell disease, thalassaemia)
- xiv. Severe learning disabilities
- xv. Autoimmune and immunodeficiency diseases (e.g. Lupus, MS, diabetes, HIV)
- xvi. Other illnesses exacerbated by cold (confirmed by GP)
- xvii. People who move in and out of homelessness
- xviii. People who have attended hospital due to a fall
- xix. Recent immigrants and asylum seekers

Royal Borough of Windsor and Maidenhead will also reserve the right to view applications on a case by case basis, and where it is felt necessary, Officers will use their discretion to approve eligibility where the resident does not meet the above criteria, but is believed to be vulnerable or in need of assistance.

### **a. "in-fill" projects**

The Royal Borough of Windsor and Maidenhead can also declare households as eligible for HHCRO measures that do not meet the criteria for FP or LIVC, where they are in the same terrace as, immediately adjacent to, or in the same building as households that do meet those criteria. Measures delivered to these premises are known as “in-fill” measures.

Premises with in-fill measures should be listed on the same LA declaration as household(s) that i) are in the same terrace as, ii) in an immediately adjacent building to or, iii) in the same building as households identified by an LA as FP or LIVC.

Only solid wall insulation, district heating and first time gas central heating (as part of a wider gas mains upgrade) can be installed where the premises are listed in the LA declaration as in-fill.

### **3) Governance**

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

Job title: Energy Reduction Manager

Email: [energy.manager@rbwm.gov.uk](mailto:energy.manager@rbwm.gov.uk)

Other Royal Borough of Windsor and Maidenhead officers are also authorised to sign declarations where required, to assist with workloads, absences, or any change of staff

### **4) Referrals**

The Royal Borough of Windsor and Maidenhead will ensure appropriate referral processes are in place and will work with relevant partners to identify potentially eligible people in the most effective way, while maintaining the protection of personal data. This will include initial identification of eligible households using the Landmark EPC data for those living in ‘fuel poverty’ and with ‘high costs’. There will be a joint working arrangement with Adult Social Care, to determine those that may be vulnerable to living in a cold home, suffering from a qualifying medical condition. All potential eligible households will be contacted and referred to a council nominated supplier.

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

- a. All data for customers seeking to be approved through the Royal Borough of Windsor and Maidenhead will be held on a secure cloud based database. Referrals will be checked and verified by the council before approval is provided, and the declaration signed,

- b. Data on measures installed will be provided to the council by the supplier, including information on works carried out, estimated fuel bill savings and customer satisfaction levels,
- c. The data will be used by the council to prepare its HECA report, and to report internally on the success of the scheme.

**6) Signature**

**I hereby approve the implementation of ECO Flexible Eligibility in the Royal Borough of Windsor and Maidenhead area, and authorise any future updates or changes to this Statement of Intent to be signed and authorised by the Head of Communities, Enforcement and Partnerships.**

(Signature Redacted for Data Protection purposes)

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Head of Communities, Enforcement and Partnerships

Royal Borough of Windsor and Maidenhead