



Energy Company Obligation: Help to Heat Joint Local Authority Flexible Eligibility Statement of Intent

Local Authority Names: Bournemouth Borough Council and Borough of Poole

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Status: Bournemouth Borough Council is acting on behalf of Borough of Poole in relation to Help to Heat Flexible Eligibility.

1. Introduction

Bournemouth Borough Council and Borough of Poole (“the Councils”) welcome the introduction of Flexible Eligibility (“FE”) in the Help to Heat Energy Company Obligation (“ECO”). FE has been created to enable local authorities to make declarations determining that certain households, that are not on Affordable Warmth (“AW”) qualifying benefits are still deserving of ECO grants. This is on the basis that they are either in Fuel Poverty (“FP”) or are considered low income and vulnerable to the effects of living in a cold home (“LIVC”). This Statement of Intent sets out the criteria the Councils intend to use to target households under FE, in line with the eligibility criteria set out in the ECO legislation. The Councils are keen to utilise the FE mechanism to ensure that deserving households that do not otherwise meet the AW criteria can benefit from energy efficiency measures wherever possible.

In April 2016, Bournemouth Borough Council updated its strategic approach to Climate Change because of the Council’s commitment to the Compact of Mayors and Paris Pledge, demonstrating Bournemouth’s support for the global movement towards reducing energy use and carbon emissions. This revision also set out Bournemouth’s intention to become a ‘Green Economy Leader’ and position itself at the cutting edge of environmental protection along with other locations that use their environmental credentials to attract business talent and inward investment. Continuing to reduce residents’ fuel bills and associated carbon emissions is a key element of our Strategy. Read the strategy at:

<http://www.bournemouth.gov.uk/greeneconomyleader>

The Borough of Poole views protecting and enhancing Poole’s natural and built environment and reducing Poole’s carbon footprint as one of its key corporate priorities. The Council recognises that it must lead residents, businesses and the public sector in a partnership to adapt to the changing climate and to reduce CO2 emissions. The Council joined the Covenant of Mayors in 2012, a European Union carbon reduction initiative with more than 5,000 signatories worldwide. In signing the Covenant the Council committed to bettering the EU target of a 20% reduction in Borough wide emissions by 2020. The resulting Sustainable Energy Action Plan can be read at: <http://archive.poole.gov.uk/environment/sustainability-and-carbon-reduction/carbon-management-programme/>

The Councils are partners in the Local Energy Advice Programme (“LEAP”) - an outreach service, funded by energy companies under the Warm Home Discount (“WHD”) Industry Initiatives fund. LEAP will serve as both the means of identifying homes that would benefit from a FE energy efficiency measure; and of verifying that the household meets the eligibility criteria. This is in line with the Council’s Home Energy Conservation Act Progress 2017

Reports available at: <https://www.bournemouth.gov.uk/environment-and-sustainability/ClimateChangeandCarbonReduction/Documents/homeenergyconservationprogressreport.pdf> and <http://archive.poole.gov.uk/environment/sustainability-and-carbon-reduction/carbon-management-programme/>

IMPORTANT NOTE: Inclusion in a Declaration of Eligibility issued by the Councils will not guarantee installation of measures. The final decision on whether any individual household will receive an offer of funded energy efficiency measures rests with obligated energy suppliers or their contractors. The final decision will depend on identification of eligible measures, the supplier or contractor's assessment of the cost-effectiveness of installing measures and whether the obligated energy suppliers have achieved their ECO targets.

2. Identification of Eligible Households

The ECO legislation and the Department for Business, Energy and Industrial Strategy ("BEIS") guidance in relation to FE outline three categories of eligibility:

1. FP: Households with low income and high heating costs, not in receipt of ECO qualifying benefits
2. LIRC: Households with low income who, because of health, disability, age or other reason, are vulnerable to the impact of living in a cold home
3. Solid wall insulation "in-fill": Eligibility criteria to facilitate solid wall insulation schemes including households that are not necessarily in fuel poverty or vulnerable.

Since the first two of these eligibility routes relate to household income, we set out below the criteria we intend to use to identify and target low income, as part of the identification of FP and LIRC. The Councils note that, under ECO legislation and BEIS guidance, **FE is only open to those living in owner-occupied or private rented sector housing (collectively "private housing")** and is not open to those in social housing. For ease of reference, these criteria are set out 'at a glance' in Appendix 1.

a. Criteria for identifying low income

The Councils intend to utilise as indicators of low income:

- (a) household gross income levels as self-certified by the householder (being not more than the income matrix below); or
- (b) a member of the household receiving certain qualifying benefits; or
- (c) significant and persistent debt problems including energy debt;

For private rented sector properties, the income of the resident (tenant) household is considered rather than that of the landlord.

The gross income thresholds that apply in the assessment of low income are set out in the table below. These are taken from the income levels in the ECO Affordable Warmth qualification criteria, as used to qualify for LEAP, and increased by 10% to account for the higher cost of housing in the South of England: "The affordability of property has worsened quite markedly over the past 15 years" - increasing by 217% (Bournemouth Strategic Housing Market Assessment, 2015).

Household	Number of children or young persons under 18 in the household				
	0	1	2	3	4 or more
One adult	£14,520	£19,140	£23,760	£28,380	£33,000
Two adults	£21,780	£26,400	£31,020	£35,640	£40,260

The Councils also intend to extend eligibility for FE to all private sector households in receipt of **any** means-tested benefits that do not qualify under the broader AW criteria. Means tested benefits that will be used as indicators as low income for FE will include:

- Housing Benefit
- Pension Credit (Savings Credit)
- Any tax credits where the household is not HHCRO eligible (Child Tax Credit, Working Tax Credit, Universal Credit)
- Carer's Allowance
- Council Tax Reduction
- A Disability Benefit (incl. Attendance Allowance, Disability Living Allowance, Personal Independence Payment)

The Councils will reserve the right to flexibility when determining eligibility around the thresholds and criteria set out above, where there is evidence that residents are struggling financially.

b. Criteria for identifying FP households

The legislation and guidance state that those households in private housing, combining low income with high home heating costs should be eligible for FE in this category. The income component of eligibility is set out in (a) above. The criteria to be used as indicators of high heating costs are:

- The home has an EPC with an E, F or G energy efficiency rating
- The home has no or a maximum of 100mm loft insulation
- The primary heating source for the home is not mains natural gas
- The home is large – with four or more bedrooms
- The main wall type of the home is uninsulated solid wall or cavity wall
- The home is a flat above business premises
- The home is a system built property
- The home is privately rented
- The household uses a prepayment meter
- Through disability, health or other condition the home is occupied for long periods or needs to be heated to abnormally high temperatures. (Note that most residents in this category will also qualify under the LIVC criteria set out below)

If the LEAP Home Energy Advisor ascertains that the annual household fuel bill is more than £800, the household will also be classified as having high heating costs.

c. Criteria for identifying LIVC households

The legislation and guidance state that those households in private housing, combining low income with health, disability, age or other conditions that result in a vulnerability to the effects of living in a cold home should be eligible for FE in this category. The income component of eligibility is set out in (a) above. The criteria to be used as indicators of vulnerability to cold reflect the National Institute for Health and Care Excellence ("NICE") 2015 guidance on excess winter deaths and illness caused by cold homes, ECO FE Guidance (BEIS, 2017) and the LEAP eligibility criteria. These are:

- Cardiovascular condition (incl. coronary heart disease, stroke, hypertension, transient ischemic attack)
- Respiratory condition (incl. COPD, asthma)
- Neurological or neurobiological condition (incl. dementia, Parkinson's disease, MS, epilepsy, fibromyalgia, ME)
- Musculoskeletal conditions (incl. arthritis, limited mobility, recently attended hospital due to a fall)

- Blood conditions (incl. Sickle cell disease, thalassemia)
- Cancer
- Moderate to severe mental illness (incl. schizophrenia, bipolar disorder and depression, where receiving regular treatment)
- Severe learning disabilities
- Autoimmune or immunodeficiency diseases (incl. lupus, diabetes, HIV)
- Terminal illness
- Other illness exacerbated by cold (confirmed by GP)
- On the Priority Services Register of partner suppliers
- Core Group Warm Home Discount recipient
- Victim of domestic violence
- Recent bereavement
- Moving in and out of homelessness
- Recent immigration or asylum seeker
- Physical or sensory disability
- A medical exemption certificate
- The resident family has small children below school age (under the age of 5)
- The resident homeowner/private tenant is an older person (over the age of 65).

d. Additional eligibility routes for FP Sole Qualification

The Councils recognise that the intention of flexible eligibility is to enable Councils to be flexible in approach to reach those in need, and therefore is adopting three additional eligibility categories for FP:

- **Area-based:** There are seven Lower Super Output Areas (LSOAs) in two geographical areas – Boscombe and West Howe – where the extent of deprivation is significant, and the Councils believe there will be a very high proportion of FP/LIVC households not eligible for AW. These are the areas that have been identified as being in the bottom decile of the main Index of Multiple Deprivation. By including all private housing residents in these LSOAs as eligible for Declarations (where suitable energy efficiency measures are identified), it will be possible for the Councils to adopt an area-based approach to increase the impact of FE. Accordingly, all private housing residents in LSOA references; E01015279; E01015281; E01015282; E01015290; E01015307; E01015309 and E01015313 (Postcodes at Appendix 2) are eligible for Declarations under this Sol. However, as recognised in previous ECO funding rounds, some deserving households will fall into adjacent LSOAs, due to the nature of the boundaries. Therefore, the Councils will reserve the right to flexibility to allow inclusion of such households in an area-based approach.
- **Park Homes:** Park home residents have been excluded from many past grant schemes and financial assistance initiatives, such as the Warm Homes Discount. The Government has recently addressed some of these issues and it is now possible for park homes to have Energy Performance Certificates and residents to claim WHD. The Fuel Poverty Strategy for England: ‘Cutting the Cost of Keeping Warm’ (DECC, 2015) identified park homes as “high-cost homes” and those living in them as “badly affected by fuel poverty”. The Government’s provision of ECO Flexible-Eligibility is a further opportunity to deliver assistance. Accordingly, all of Bournemouth and Poole’s park home residents are eligible for Declarations under this Sol.
- **Privately Rented properties with an EPC rating of E, F or G:** The private rented sector is well documented as being the hardest sector to improve in energy efficiency terms. “Amongst EPC F and G rated properties in the sector... 45% of households are classified as fuel poor” (The Domestic Private Rented Property Minimum

Standard – BEIS, 2017). This is being addressed by the implementation of the Minimum Energy Efficiency Standard, but further help is required. Accordingly, and in line with national targets to raise EPC ratings, the tenant of any privately rented property with an EPC rating of E, F or G is eligible for Declarations under this Sol.

e. Solid wall insulation “in-fill” projects

Where potential solid wall insulation works have been identified, households will be supported to take advantage of ECO funding for solid wall insulation under the “in-fill” category as set out in the guidance issued by BEIS in April 2017, and subject to the rules and restrictions set out therein, particularly in relation to the minimum number of FP/LIVC households being met.

3. Governance

Responsible officer: The Bournemouth Borough Council officer named below will be responsible for signing Declarations on behalf of the Councils.

Name: Neil Short Job title: Sustainability Manager – Green Economy & Energy
Telephone: 01202 454857 Email: neil.short@bournemouth.gov.uk

The key governance consideration is confirming that households meet the eligibility criteria set out in this Statement of Intent prior to a Declaration being issued. The governance mechanism that will be used to ensure that this is the case, is LEAP. All referrals will be channelled into the LEAP service (see section 4 below) and their eligibility will be checked through the LEAP service.

Eligibility for LEAP, which is funded under the Warm Home Discount Industry Initiatives scheme, has been approved by Ofgem as being in line with the requirement that it is provided ‘to domestic consumers who are in fuel poverty or in a fuel poverty risk group’.

Therefore, where:

- i) a non-social housing, domestic customer has been referred into the LEAP service and their eligibility has been verified through the LEAP service; and
- ii) the dwelling in question has been assessed during a visit and a potential ECO measure has been identified; and
- iii) it is not eligible for AW funding through qualifying benefits; and
- iv) LEAP confirms (following any further checks necessary) that, in addition to being eligible for LEAP, the household also meets the FE eligibility criteria set out in sections 2.a to 2.e above;

then the Councils will be minded to issue a Declaration under the FE mechanism for that property. LEAP eligibility has been closely aligned with FE eligibility, therefore the extra effort and customer inconvenience involved in FE eligibility checking is minimised. Furthermore, if households are eligible under this Sol but are not included in standard LEAP eligibility criteria, this Sol will make them eligible for the LEAP service, thus delivering assistance to a higher number of FP and LIVC households.

The LEAP team will provide reports to the Councils monthly, and as required, in order that the Councils can meet the requirements set out in section 5. Reports will include information on all ECO measures (including those under FE) identified, and on actual ECO installations that have taken place, for monitoring by the Bournemouth and Poole Affordable Warmth Partnerships.

4. Referrals

The Councils are keen to secure the maximum number of energy efficiency measures, including but not limited to those funded through FE, for the boroughs. The Councils view FE as an important component of this, and will therefore generate direct referrals and self-referrals using several different methods – set out further on in this section.

The Councils have partnership arrangements with AgilityEco and Ridgewater Energy Ltd to deliver the LEAP scheme and ECO-funded works to residents. All FE referrals will be channelled through the LEAP service rather than directly referring households for a FE declaration. Operating Bournemouth and Poole's FE declarations through the LEAP service brings several benefits:

- The household will gain the broader benefits of the LEAP service (simple energy efficiency measures, help in switching energy tariffs, income maximisation support, follow-up local support, etc.)
- The need for an ECO-funded measure such as cavity wall insulation, loft insulation, room-in-roof insulation or a heating system replacement can be verified during the home visit, to ensure that Declarations are only produced where there is a reasonable prospect of a funded measure being installed
- The customer's eligibility under the Bournemouth FE Statement of Intent will be checked as part of the LEAP process (through the initial LEAP referral, the LEAP appointment booking phone call, the home visit or a follow-up phone call where required), before a Declaration is produced, as set out in section 3 above. This will also involve checking that the household does not qualify under the normal AW rules
- The household's desire for an ECO/FE referral is determined prior to a Declaration being issued – this is important for customer consent and data protection purposes.

The strategies for generating LEAP referrals are: targeted promotion generating self-referrals from eligible clients and direct referrals by members of the Bournemouth and Poole Affordable Warmth Partnerships (including Citizens Advice, Ridgewater Energy Ltd, Department for Work and Pensions, Age UK, NHS, Wiltshire and Dorset Fire Service and many other local organisations). This approach has proven to be effective, since having commenced in early 2017, LEAP has helped over 800 Bournemouth and Poole households to save over £600,000 in energy bill reductions and increased benefits.

Cold calling: As identified in the BEIS FE guidance, the Councils aim to avoid distress to vulnerable residents from aggressive and unscrupulous cold-calling marketing practices, which has been of concern during past ECO funding rounds. To achieve this, **the Councils will only progress referrals and issue Declarations for works that have come via the LEAP scheme.**

Any referrals for insulation works falling outside the above FE criteria will, with client's permission, be passed to the Public Health-funded Healthy Homes Dorset insulation scheme, currently operated by the Centre for Sustainable Energy.

5. Evidence, monitoring and reporting

The key elements of the evidence, monitoring and reporting process are set out below:

- i) Prior to any property being included in a Declaration, the Councils will require information from the LEAP service on the FE criteria that each household meets along with supporting evidence. This will have been gathered by the LEAP team through an initial telephone call with the resident, the home visit and further information collected to check eligibility.
- ii) As a data protection agreement is in place between the LEAP service provider and the Councils, required data will be made available to the Councils to ensure that a

clear audit trail is available. This will be retained for a minimum of two years, or such longer periods required under the relevant legislation.

- iii) As households, including those included in FE declarations, proceed through the ECO process, the Councils will be updated in regular reports on the progress of each household.
- iv) Details of households reached through FE will be made available to the Councils to record the number of households assessed, how many were deemed eligible and ineligible, and how many received heating and insulation improvements under both Flexible Eligibility and broader ECO funding.
- v) The Councils will audit a sample of households to confirm eligibility and review this Statement of Intent if found to be necessary.

6. Signatures

Signed *Bill Cotton*
.....

Bill Cotton
Executive Director
of Environment and Economy
Bournemouth Borough Council

Signed *Kate Ryan*
.....

Kate Ryan
Strategic Director - Place
Borough of Poole

Appendix 1

Eligibility for Bournemouth and Poole ECO-Flex Declarations – at a glance

Criteria set out in the Statement of Intent that households must meet (either $a + b$ (FP) or $a + c$ (LIVC) or sole FP qualifications d or e)																										
a) Low income and either:	b) Fuel Poverty (FP) or	c) Vulnerable to Cold (LIVC)																								
<p>Housing Benefit</p> <p>Pension Credit (Savings Credit)</p> <p>Child Tax Credit (income below thresholds)</p> <p>Working Tax Credit (income below thresholds)</p> <p>Universal Credit (income below thresholds)</p> <p>Carers Allowance</p> <p>Council Tax Reduction</p> <p>A Disability Benefit (incl. Attendance Allowance, DLA, PIP)</p> <p>Persistent debt problems</p> <p>Household gross income levels being not more than those in the income matrix below:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">Household</th> <th colspan="5" style="text-align: center;">Number of children or young persons under 18 in the household</th> </tr> <tr> <td></td> <td style="text-align: center;">0</td> <td style="text-align: center;">1</td> <td style="text-align: center;">2</td> <td style="text-align: center;">3</td> <td style="text-align: center;">4 or more</td> </tr> </thead> <tbody> <tr> <td>One adult</td> <td style="text-align: right;">£14,520</td> <td style="text-align: right;">£19,140</td> <td style="text-align: right;">£23,760</td> <td style="text-align: right;">£28,380</td> <td style="text-align: right;">£33,000</td> </tr> <tr> <td>Two adults</td> <td style="text-align: right;">£21,780</td> <td style="text-align: right;">£26,400</td> <td style="text-align: right;">£31,020</td> <td style="text-align: right;">£35,640</td> <td style="text-align: right;">£40,260</td> </tr> </tbody> </table> <div style="border: 1px solid black; padding: 10px; margin-top: 10px; background-color: #f0f0f0;"> <p>d) OR: one of these sole FP qualifications:</p> <ul style="list-style-type: none"> Client is private housing resident in a Bournemouth LSOA identified as in the bottom decile of the IMD (see Appendix 2 for postcodes) Client is a park home resident Client is a tenant in a privately rented property with an EPC rating of E, F or G <p>e) OR: a solid wall insulation “in-fill” project</p> </div>	Household	Number of children or young persons under 18 in the household						0	1	2	3	4 or more	One adult	£14,520	£19,140	£23,760	£28,380	£33,000	Two adults	£21,780	£26,400	£31,020	£35,640	£40,260	<p>EPC of E, F or G</p> <p>No or maximum of 100mm loft insulation</p> <p>Primary heating source not mains natural gas</p> <p>Four or more bedrooms</p> <p>Uninsulated solid wall or cavity wall</p> <p>Park home or mobile home</p> <p>Flat above business premises</p> <p>System built property</p> <p>Privately rented</p> <p>Prepayment meter</p> <p>Home occupied for long periods or heated to abnormally high temperatures.</p> <p>Annual household fuel bill is more than £800</p>	<p>Cardiovascular condition</p> <p>Respiratory condition</p> <p>Neurological or neurobiological condition</p> <p>Musculoskeletal conditions</p> <p>Blood conditions</p> <p>Moderate to severe mental illness</p> <p>Severe learning disabilities</p> <p>Autoimmune or immunodeficiency diseases</p> <p>Cancer</p> <p>Terminal illness</p> <p>Other illness exacerbated by cold (confirmed by GP)</p> <p>Core Group WHD recipient</p> <p>Victim of domestic violence</p> <p>Recent bereavement</p> <p>Moving in and out of homelessness</p> <p>Recent immigration or asylum seeker</p> <p>Physical or sensory disability</p> <p>Medical Exemption Certificate</p> <p>On Priority Services register of partner supplier</p> <p>Children under the age of 5</p> <p>Resident over the age of 65</p>
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Appendix 2

Eligibility for Bournemouth and Poole ECO-Flex Declarations: FP Qualifying LSOA Postcodes

BH1 1EZ	BH1 3SH	BH1 4EA	BH1 4HT	BH5 1EJ	BH11 8DS	BH11 8HL
BH1 3BE	BH1 3SR	BH1 4ED	BH1 4HU	BH5 1EL	BH11 8DT	BH11 8HN
BH1 3BL	BH1 4AB	BH1 4EF	BH1 4HW	BH5 1EQ	BH11 8DU	BH11 8HQ
BH1 3ED	BH1 4AD	BH1 4EG	BH1 4HX	BH5 1EU	BH11 8DW	BH11 8HR
BH1 3HA	BH1 4AE	BH1 4EH	BH1 4HY	BH5 1EX	BH11 8DX	BH11 8HS
BH1 3HT	BH1 4AG	BH1 4EJ	BH1 4HZ	BH5 1FE	BH11 8DY	BH11 8HT
BH1 3NS	BH1 4AH	BH1 4EL	BH1 4JE	BH8 8GH	BH11 8DZ	BH11 8HX
BH1 3NT	BH1 4AJ	BH1 4EN	BH1 4JF	BH8 8GJ	BH11 8EA	BH11 8HY
BH1 3NU	BH1 4AL	BH1 4EP	BH1 4JH	BH11 8AB	BH11 8EB	BH11 8HZ
BH1 3NY	BH1 4AN	BH1 4EQ	BH1 4JL	BH11 8AD	BH11 8EE	BH11 8JA
BH1 3PD	BH1 4AQ	BH1 4ER	BH1 4JP	BH11 8AH	BH11 8EF	BH11 8JB
BH1 3PE	BH1 4AX	BH1 4ES	BH1 4JR	BH11 8AJ	BH11 8EG	BH11 8JD
BH1 3PG	BH1 4AY	BH1 4ET	BH1 4LA	BH11 8AL	BH11 8EH	BH11 8JP
BH1 3PQ	BH1 4AZ	BH1 4EU	BH1 4LB	BH11 8AN	BH11 8EJ	BH11 8LD
BH1 3PR	BH1 4BA	BH1 4EW	BH1 4LG	BH11 8AQ	BH11 8EL	BH11 8LE
BH1 3PZ	BH1 4BD	BH1 4EX	BH1 4LJ	BH11 8AS	BH11 8EN	BH11 8LN
BH1 3QA	BH1 4BE	BH1 4EY	BH1 4LT	BH11 8AT	BH11 8EP	BH11 8QU
BH1 3QB	BH1 4BH	BH1 4EZ	BH5 1AE	BH11 8AU	BH11 8EQ	BH11 8SE
BH1 3QF	BH1 4BT	BH1 4FD	BH5 1AH	BH11 8AW	BH11 8ER	BH11 8SF
BH1 3QG	BH1 4BZ	BH1 4GZ	BH5 1AL	BH11 8AY	BH11 8ES	BH11 8SG
BH1 3QH	BH1 4DB	BH1 4HA	BH5 1AU	BH11 8AZ	BH11 8ET	BH11 8SJ
BH1 3QL	BH1 4DG	BH1 4HB	BH5 1AW	BH11 8BA	BH11 8EU	BH11 8SL
BH1 3QN	BH1 4DH	BH1 4HD	BH5 1DB	BH11 8BB	BH11 8EW	BH11 8SN
BH1 3QR	BH1 4DJ	BH1 4HE	BH5 1DD	BH11 8BD	BH11 8EX	BH11 8SQ
BH1 3QW	BH1 4DN	BH1 4HF	BH5 1DH	BH11 8BH	BH11 8EY	BH11 8SS
BH1 3RB	BH1 4DP	BH1 4HG	BH5 1DT	BH11 8BJ	BH11 8EZ	BH11 8TB
BH1 3RG	BH1 4DQ	BH1 4HH	BH5 1DU	BH11 8BZ	BH11 8GB	BH11 9HN
BH1 3RH	BH1 4DR	BH1 4HL	BH5 1DY	BH11 8DA	BH11 8HA	
BH1 3RJ	BH1 4DS	BH1 4HN	BH5 1DZ	BH11 8DB	BH11 8HB	
BH1 3RQ	BH1 4DT	BH1 4HP	BH5 1EA	BH11 8DD	BH11 8HD	
BH1 3RY	BH1 4DW	BH1 4HQ	BH5 1EB	BH11 8DN	BH11 8HE	
BH1 3RZ	BH1 4DX	BH1 4HR	BH5 1EE	BH11 8DP	BH11 8HH	
BH1 3SA	BH1 4DZ	BH1 4HS	BH5 1EG	BH11 8DR	BH11 8HJ	