



Energy Company Obligation Help to Heat

Flexible Eligibility - Statement of Intent (ECOFLEX)

Darlington Borough Council

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1 Introduction and Policy Context

Darlington has a population of 106,000 comprising 47,332 households with a growing number of households living in the private rented sector, estimated to be 18% of households in the borough.

It is recognised that being healthy involves more than good health and social care services and many other things impact on health and wellbeing; including housing.

Darlington's Sustainable Communities Strategy, One Darlington Perfectly Place has identified reducing health inequalities as a priority along with access to decent housing. Providing access to healthy homes is a priority and providing energy efficient homes is a priority.

In Darlington, it is estimated that there are approximately 6,551 households considered to be in fuel poverty which is approximately 13.7% of households. A slight reduction from earlier figures but still unacceptably high. Fuel poverty data is available at LSOA level and there are dramatic variations across the borough ranging from 5.2% to 28.8%.

Darlington is ranked 58th out of 326 local authority areas for deprivation. At ward level 5 of the 20 wards in Darlington are in the top 10% of most deprived in the country. With two of these wards being found in the top 10-20% of wards nationally. A lower ranking means that deprivation levels are higher and conversely a higher figure means that deprivation levels are lower.

Recent stock condition survey information is not available but the last local Stock Condition Survey (2008) indicated that up to 33% of properties failed the Decent Homes Standard and nearly 17% of these failed because they had low levels of thermal comfort. Greater levels of thermal comfort failures were found in the private rented sector but also high levels for some groups who own their own homes.

Low income and vulnerable households may live in cold and unhealthy homes as a result of fuel poverty and this may exacerbate any debt issues.

The Energy Company Obligation is a government energy efficiency scheme in Great Britain to help reduce carbon emissions and tackle fuel poverty. The Electricity and Gas (Energy Company Obligation) Order 2018 sets out those households who would qualify for energy savings measures, and this “Help to Heat group” is set out in schedule 2 of the Order. In addition to this, there is a degree of flexibility which allows Local Authorities to refer households to suppliers for support, in particular households in fuel poverty or with occupants on low incomes and vulnerable to the effects of cold homes, and who otherwise would not be eligible. This is referred to as the Help to Heat Flexible Eligibility Criteria. Local Authorities are obliged to publish a Statement of Intent which sets out who is eligible for this element of the funding.

Darlington Borough Council will use this flexible eligibility to assist households in fuel poverty and hardship. Making the best use of existing homes by improving their quality and conditions. This statement takes into account NICE recommendations on how to reduce the risk of death and ill health associated with living in a cold home.¹

The aim is to help meet a range of public health and other goals. These include:

- Reducing preventable excess winter death rates.
- Improving health and wellbeing among vulnerable groups.
- Reducing pressure on health and social care services.
- Reducing 'fuel poverty' and the risk of fuel debt or being disconnected from gas and electricity supplies (including self-disconnection).
- Improving the energy efficiency of homes.

Generally, high levels of older terraced housing means that maintaining good levels of thermal comfort remains a challenge for residents, this is compounded by the ever increasing costs of energy.

Improvements to make homes warmer may also help reduce unnecessary fuel consumption (although where people are living in cold homes because of fuel poverty their fuel use may increase). In addition, such improvements may reduce absences from work and school that result from illnesses caused by living in a cold home.

The health problems associated with cold homes are experienced during 'normal' winter temperatures, not just during extremely cold weather, an increase in death rates due to a drop in temperature varies across England but can happen when temperatures drop below about 6°C.

In adopting this approach to flexible eligibility it is hoped that it will contribute to an improvement in the excess winter deaths index and the death rate from respiratory illnesses.

¹ NICE guideline (NG6): published date March 2015 <https://www.nice.org.uk/guidance/ng6>

In producing this statement, we have made reference to the Government's Fuel Poverty Strategy 2015².

2 Additional services and available support

All organisations responsible for health, wellbeing, care and safety have the opportunity to impact on people's mental and physical health and wellbeing. With increased pressure on organisations to reduce costs and increase quality and productivity, services can no longer be focused on symptoms or single issues in isolation. There is a need for systemic change towards proactive prevention and a greater emphasis on addressing the wider determinants of health, such as education, housing or social environment. Treating people without identifying and changing what makes them unwell is costly to all involved.

A key support structure is the priority services registers run by energy suppliers and distributors. These schemes offer extra free services to people who are of pensionable age, are registered disabled, have a hearing or visual impairment, or have a long term health problem.

Adult social care can assess applications from households where a disability or illness is making daily life difficult. They may award a disabled facilities grant towards the cost of providing adaptations and facilities to enable the disabled person to continue to live in the property.

<https://www.gov.uk/government/publications/disabled-facilities-grant>

Homeowners struggling to carry out essential repairs, improvements or adaptations to their home, may be able to access an affordable loan and step-by-step support through The Helping Hand scheme, <https://helpinghandnortheast.org.uk/>

A Tees Valley-wide private landlord forum is held annually and these are an opportunity for landlords to keep up to date with regulations and legislation governing the private sector.

3 Darlington Borough Council's Approach to Flexible Eligibility

The Council's approach to the Help to Heat flexible eligibility criteria (as outlined below) has been taken to maximise the potential for funding. However fitting the criteria within this statement of intent does not guarantee that any individual household will benefit from energy saving improvements as the final decision on funding rests with energy suppliers and will depend on:

- i) The survey carried out and installation costs calculated,

² HM Government Cutting the cost of keeping warm: a fuel poverty strategy for England March 2015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/408644/cutting_the_cost_of_keeping_warm.pdf

- ii) The energy savings that can be achieved for a property, and
- iii) Whether suppliers have achieved their ECO targets or require further measures to meet their ECO targets (this will affect the amount of funding available through the scheme).

4 How Darlington Borough Council intends to identify eligible households

Households are considered eligible for flexible eligibility ECO if they are deemed at risk of living in fuel poverty due to the location of their home or they meet the Low Income, High Cost criteria, or a low income household, with at least one household member vulnerable to the effects of living in a cold home (Low Income, Vulnerable to Cold). Flexible eligibility only applies to private tenure so a property must be privately owned or rented.

5 Criteria for identifying households that are living in fuel poverty

5.1 Priority Areas

All private tenure properties within Darlington in the 25% most deprived areas of the UK measured by the Government's Index of Multiple Deprivation (IMD) will be deemed at risk of living in fuel poverty.

Households outside of these areas will be considered at risk of fuel poverty if they are determined to be a low income household, living in a high cost home in relation to energy use. This can be assessed using available software tools such as the National Energy Action Fuel Poverty Assessment Tool or against the Low Income High Cost criteria outlined below.

We would expect the energy company or their nominated contractor to ensure that all eligible households fully comply with Stage 1 and Stage 2 criteria as follows:

5.2 Low Income, High Cost Households

Households not in a priority area will be eligible if they are in receipt of one of the following benefits:

- Council Tax Allowance (Not single person reduction)
- Housing Benefit
- Pension Credit Savings
- Or, any household, not in receipt of one of these benefits with a gross annual household income of less than £26,000.

5.3 Low Income, Vulnerable to Cold (LIVC)

Households will be considered a low income household, and vulnerable to the effects of living in a cold home, if they meet Stage 1 (Low Income) criteria and someone in the household meets one of the Stage 2 (Health and Vulnerability) criteria as set out in table 2 below.

Income includes income from pensions and all benefits. The income threshold has been uplifted to take into account increased household expenditure on medical equipment, medical appointments and increased energy costs.

Table 2 - Low Income, Vulnerable to Cold

Stage	Criteria	Definition
Stage 1 LIVC	Low Income	Gross annual household income <£32,000.
Stage 2A LIVC	a) High Cost and vulnerable to cold due to illness	One or members of the household has a health condition made worse by living in a cold home*
Stage 2B LIVC	b) High Cost and vulnerable to the cold due to age	One or more members of the household is aged over 65 years and/or is a child under the age of 16 or member of the household is pregnant.

***Stage 2A Health and vulnerability criteria**

* A wide range of people are vulnerable to the cold. This is either because of: a medical condition, such as heart disease; a disability that, for instance, stops people moving around to keep warm, or makes them more likely to develop chest infections; or personal circumstances, such as being unable to afford to keep warm enough.

Studies indicate that cold conditions can exacerbate existing medical conditions including diabetes, certain types of ulcers and musculoskeletal pains. Studies have found an association between cold homes and the increased likelihood of developing symptoms of asthma and bronchitis which can develop into long-term conditions. In addition, cold homes may slow down recovery following discharge from hospital.

Referrals for people with medical conditions which may be exacerbated by living in a cold home will need to be supported by documentary evidence from a medical professional.

Other households that may be considered on referral from a professional organisation are:

- people with addictions;

- people who have attended hospital due to a fall;
- recent immigrants, asylum seekers and refugees;
- people who move in and out of homelessness;
- households that are falling into debt due to a change in circumstances compounded by high energy costs;

5.4 Special Circumstances

Households may also be considered eligible due to special circumstances for example, where a member of the household is awaiting discharge from hospital or where there are issues associated with debts. We will assess such households on a case by case basis and will record all such decisions.

6 Scheme requirements for Solid Wall Insulation (SWI) “in-fill” projects

The Council may facilitate solid wall insulation schemes including households that are not in fuel poverty or vulnerable (‘in-fill’). Flexible eligibility only applies to private tenure; therefore all the properties on a declaration, including in-fill, must be private tenure.

Outside the priority areas outlined in paragraph 5.1, where a household does not meet the criteria for fuel poverty (outlined at 5.1a) or living on a low income and vulnerable to the cold (outlined at 5.2b), the local authority can declare a household as “in-fill” where they are:

- in the same terrace;
- in an immediately adjacent building to, or
- are in the same building.

as a household that does meet those criteria.

In-fill is only allowed where a minimum percentage of households for which the is providing declarations are fuel poor (FP) or on a low income and vulnerable to the cold (LIVC), as set out in Table 3.

Not all the properties in one terrace need to be included in the SWI project in order for the project to be eligible under flexible eligibility.

Table 3 - Summary of the requirements for property types for in-fill projects

Property Type	LA (Local Authority) declaration requirements	In-fill available
Project consisting of a pair of semi-detached houses or bungalows, or a building containing no more than two domestic premises	At least one of the two-properties must be declared by the LA as Fuel Poor or LIVC (i.e. 50% of the properties are FP or LIVC).	The other property to which it is directly adjoined is eligible for solid wall insulation.
Project consisting of any premises that are contained in the same building (e.g. flats), immediately adjacent buildings (e.g. neighbouring detached properties) or in the same terrace	At least two in three properties on the list must be declared by the LA as Fuel Poor or LIVC (i.e. at least 66% of the properties are FP or LIVC)	The other (i.e. up to one third) of properties in the project are eligible for solid wall insulation, provided they are either in the same building, an immediately adjacent building or in the same terrace as the ones identified as FP or LIVC

7 Governance

The Private Sector Housing Manager (or equivalent) will be responsible for signing declarations on behalf of Darlington Borough Council and in their absence, this will be delegated to a Senior Private Sector Housing Officer.

Where an applicant disputes the decision of the local authority in respect of them not qualifying under Flexible Eligibility, this will be reviewed by the Head of Community Safety.

8 Referrals

Referrals are expected from professional organisations that may come into contact with fuel poor or vulnerable households. Some examples include (but are not limited to) social workers, health visitors, occupational therapists, General Practitioners, the Fire Service, Citizens Advice, the Stroke Association, Mind, Age Concern, elected members, energy companies and Communitas Energy CIC (Community Interest Company).

9 Evidence, monitoring and reporting

The Private Sector Housing Team, within Community Safety, will be responsible for keeping records of the application.

It will be the responsibility of the energy company or their nominated contractor to ensure that applicants meet the eligibility criteria and for obtaining evidence and/or applicants' declaration of eligibility.

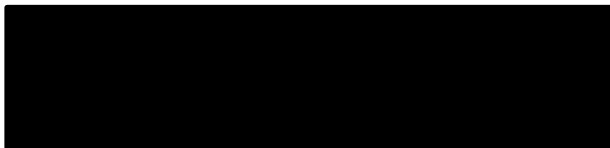
We will collect information on the following:

- Number of households included on declarations, broken down by eligibility type;
- Number of households who received measure, by type (provided by suppliers);
- Number of households ineligible following declaration and reason why (provided by suppliers);
- Suppliers and installers worked with;
- Any additional funding provided in conjunction with flexible eligibility.

All applications will be recorded on a secure system and information will be shared in accordance with the Data Protection Act and the General Data Protection Regulation. It will be the responsibility of the energy company or their nominated contractor to obtain the necessary consent from applicants to share their personal data.

The Council will require the energy company to enter into a data sharing agreement with the Council and reserves the right to reject referrals not in accordance with agreed arrangements.

10 Signature



Ian Williams
Director of Economic Growth

Dated 5th March 2019