

## Local Authority ECO Flexible Eligibility Statement of Intent

### Solihull Metropolitan Borough Council Statement of Intent, Flexible Eligibility Criteria for ECO: Help to Heat Programme October 2018 – March 2022

- 1) Date of publication – 1 October 2018
- 2) Publication on website <http://www.solihull.gov.uk/About-the-Council/Strategies-policies/housing>
- 3) Review date: to be reviewed by 31<sup>st</sup> March 2022
- 4) Statement of Intent Version 2

#### Flexible Eligibility Criteria for ECO –October 2018- March 2022

This statement sets out the flexible eligibility criteria for ECO for Solihull Metropolitan Borough Council for October 2018 - March 2022

##### 1. What is the ECO Scheme?

The Energy Company Obligation (ECO) is a government energy efficiency scheme in Great Britain to help reduce carbon emissions and tackle fuel poverty. The Help to Heat element of the Government's ECO programme, also described as the Home Heating Cost Reduction Obligation (HHCRO), focuses on low income and vulnerable householders. These are householders who receive specific benefits and, for child benefits, are below a certain income threshold. This eligibility criteria is set by Government.

As part of Help to Heat, ECO legislation is permitting Local Areas to define additional criteria in their area to help those fuel poor households that fall outside the Help to Heat eligibility but are still in need of support. This is called the flexible element or flexible eligibility. This requires a Statement of Intent to be produced.

##### 2. What are the qualifying Criteria for the ECO - Help to Heat Group

A person living in private domestic premises is a member of the help to heat group if they receive one of the following benefits:

- Universal Credit
- Tax Credits
- Disability Living Allowance
- Personal Independence Payment Living Allowance
- Carer's Allowance
- Severe Disablement Allowance
- Industrial Injuries Disablement Benefit
- War Pensions Mobility Supplement
- Constant Attendance Allowance
- Armed Forces Independent Payment
- Child Benefit (income thresholds apply- see table 1)

**Table 1: Qualifying income thresholds for households in receipt of child benefit**

Type of claim	Number of children or qualifying young persons			
	1	2	3	4 or more
Single claim	£18,500	£23,000	£27,500	£32,000
Joint claim	£25,500	£30,000	£34,500	£39,000

The Help to Heat criteria is set by Government.

### 3. What is Flexible Eligibility?

For the period running from October 2018 - March 2022 energy suppliers will be able to achieve up to 25% of their Help to Heat target in households falling outside of the eligibility criteria described in section 2 above, who are defined as eligible by local authorities through their Statement of Intent.

There are two main categories of private tenure targeted by the scheme:

- People living in fuel poverty, in particular those not in receipt of eligible benefits
- People living on a low income and vulnerable to the effects of living in a cold home

In addition, a proportion of non-fuel poor homes (in-fill) can be allowed for Solid Wall Insulation projects. In-fill can also apply to affordable warmth projects for example providing heating in blocks of flats.

### 4. The Roles and Responsibilities of the Local Authority

The council is required to:

- Produce and publish a Statement of Intent
- Produce, authorise and issue the declaration determining a household to be eligible
- Retain information to sufficiently evidence that a household meets the criteria outlined in the Statement of Intent for future reporting or audit

### 5. Fuel Poverty

The latest fuel poverty figures for Solihull were published in June 2018. In 2016, 8,816 households (9.8%) in Solihull were fuel poor; this has improved from 10.6% in 2017 following interventions.

Fuel poverty at local level uses lower super output areas (LSOAs) which are small areas covering around 1500 residents. As a borough we have 37 LSOA with fuel poverty higher than the national average of 11.1%.

In defining our criteria we need to consider all the implications not just fuel poverty that might lead to a household being on a low income and vulnerable to cold. We have looked into details of deprivation (specifically IMD data), income and health to help define the criteria we have chosen.

The Council has for many years appreciated the need to promote home energy efficiency and support vulnerable residents in achieving an affordable heating regime. Given rising energy prices and Climate Change, it has never been more important to ensure that we conserve energy and

promote, at the domestic level, the use of low and zero carbon energy sources and support residents in lowering fuel costs.

## **6. How we intend to identify eligible households**

Evidence base:

**Deprivation** – Solihull is a relatively polarised borough. This is reflected in the fact that compared to other local authorities in England a relatively high proportion of LSOA's are in the most deprived 10% in the country. The borough has at least 10 LSOA's in the most deprived 5% of neighbourhoods in England in each crime, employment and income domains.

All of the LSOA's in the bottom 10% nationally for overall deprivation in 2015 are in North Solihull regeneration areas. In total 20 out of the 29 LSOA's in the wider North Solihull area are in the deprived 20% in the country.

Green Hill (Shirley East) and Hobs Moat North (Lyndon Wards) are the only LSOA's outside of the regeneration area in the bottom 20% nationally, with Olton South, Ulverley East (Lyndon) and Solihull Lodge (Shirley West) also in the most deprived 30% in the country. It is therefore important that we ensure that households in these LSOA's are able to access energy efficiency measures.

**Income** – Although Solihull is often perceived to be an area of wealth, as with the IMD data there are areas of the borough with income levels that fall below the national averages. Earnings are a limited way of assessing prosperity, as this data does not take into account employment rates, family structure or factors such as housing costs.

**Health** – Solihull has a relatively old and ageing population. 43,900 people are aged over 65+ (21% of population compared to England average of 18%). Census measures of health show that older people in Solihull have a similar health profile to England. However, on some indicators of health and care, performance is below average. For instance,

- Falls – significantly higher rate of injuries for over54's than England
- Flu vaccination below national average (at risk groups 43.1% (45%), 65+ 71.3% (71%). This is a reduction on previous year.
- Solihull figures for excess winter deaths in the over 85's is one of the highest in the West Midlands (3 year average)

The Council will continue to support vulnerable households targeting people with the following characteristics

- i. Aged over 60, and particularly those over 75
- ii. Children under 5 and pregnant mothers
- iii. Respiratory disease (COPD, asthma)
- iv. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- v. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
- vi. Substance misusers
- vii. Dementia
- viii. Neurobiological and related diseases (e.g. fibromyalgia, ME)

- ix. Cancer
- x. Limited mobility
- xi. Haemoglobinopathies (sickle cell disease, thalassaemia)
- xii. Severe learning disabilities
- xiii. Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)

Due to the diversity of households in the borough, we have developed a number of criteria to ensure that we address household vulnerability to both fuel poverty and cold.

Criteria	Owner occupiers eligible	Privately rented eligible
<b>Criteria 1:</b> Low Income High fuel Costs (LIHC) fuel poverty data 2016. Any household within an LSOA with fuel poverty levels above the national average with a household income below the boroughs mean of £31,796 (gross) per annum with high energy costs or under heating the home will be eligible.	√	X
<b>Criteria 2:</b> Anyone who has qualified for a Disabled Facilities Grant in the last 3 years.	√	X
<b>Criteria 3:</b> Anyone over the age of 65 years old with a household income below the borough mean of £31,796 (gross) per annum.	√	X
<b>Criteria 4:</b> Private rented sector households in the borough for insulation measures only.	X	√
<b>Criteria 5:</b> A householder with an existing diagnosed health condition made worse by living in a cold home (such as a cardiovascular conditions, respiratory conditions,) and an EPC rating of E, F and G and/or an income of below the borough mean household income of £31,796 (gross) per annum	√	X
<b>Criteria 6;</b> Any privately owned household with a pre-payment meter and a household income below the borough mean of £31,796 (gross) per annum	√	X
<b>Criteria 7:</b> Any ex social housing property sold into private ownership (right to buy properties) with a household income below the borough mean household income of £31,796 (gross) per annum	√	X
<b>Criteria 8:</b> Anyone living in a park home on a residential park homes site with a household income below the borough mean household income of £31,796	√	X
<b>Criteria 9: First Time Central Heating only-</b> A household with no existing central heating, located within 23m of a gas main (or distance deemed feasible by the District Network Operator) and a household income below the borough mean household income of £31,796 (gross) per annum	√	√ (existing energy efficiency band A-E only are eligible)

## External Wall Insulation (EWI)

The need for an external wall insulation scheme remains. There will be some ad hoc projects. This will be reviewed when more information is available to the Authority regarding the levels of funding to support installation. Independent quality inspections of each external wall insulation job would be required for external wall insulation to be supported under flexible element.

We intend to facilitate EWI for one off properties situated within EWI schemes administered by other organisations, i.e. right to buy properties that adjoin properties having EWI installed by a social housing provider.

## Governance

Primary contact for signing the declarations will be our Home Energy Conservation Officer/Sustainability Officer:

Robin Dunlevy

Growth Strategy and Commissioning

Managed Growth and Communities Directorate

Solihull Metropolitan Borough Council

Council House

Manor Square

Solihull

West Midlands

B91 3QB

[rdunlevy@solihull.gov.uk](mailto:rdunlevy@solihull.gov.uk)

### 10 step governance process

Step	activity	Who is responsible
1	5) Statement of intent published on <a href="http://www.solihull.gov.uk/About-the-Council/Strategies-policies/housing">http://www.solihull.gov.uk/About-the-Council/Strategies-policies/housing</a>	Solihull Metropolitan Borough Council
2	<b>Householder eligibility assessment:</b> Householder contact logged with referral agent. Application and consent forms completed by the customer and returned to the referral agent.	Act on Energy
3	Householder offered additional energy advice i.e. switching suppliers, understanding their energy bill, smart meters	Act on Energy
4	Declaration <ul style="list-style-type: none"><li>- A single declaration per property is sent by the appointed referral agent to SMBC</li></ul>	SMBC

	- Cross checked with information in statement of intent and referral agents records Any rejected declaration return to step 2.	
5	Referral sent to delivery partner with customer consent	Referral agent
6	<b>Property eligibility assessment;</b> Technical survey	Installer
7	Measure and funding options offered to the customer based on technical survey	Installer
8	Install accepted or rejected by the customer. Install arrangements made between the customer and installer	Customer and installer
9	Customer feedback requested	Referral agent
10	Review of process, cases and customer feedback completed by the Project Manager.	SMBC/ Act on Energy /Energy Supplier

## 6) Referrals

Marketing will be undertaken by the Council and its partners utilising available data to aid targeting to the eligible criteria groups referred to above. The programme will predominantly focus on self referral as a result of marketing activity, such as direct mail to households who may be eligible. Any marketing will contain the local authority logo for the organisation undertaking the marketing as a minimum.

Act on Energy will take all calls related to this programme and collect the relevant data, which will be stored and managed in line with the Data Protection Act 2018. Householders will be asked to consent to their contact details being passed from the referral agent to a named installer and its funder.

Act on Energy's privacy notice can be viewed via <http://www.actonenergy.org.uk/wp-content/uploads/2018/05/User-Privacy-Policy-GDPR-2018.pdf>

SMBC will confirm with Act on Energy that the declaration has been agreed. The referral agent is then responsible for making the referrals to their chosen installer. Declarations will only be signed when received from Act on Energy.

## 7) Signature

Name: ANNE BRERETON

Position: Corporate Director

Organisation: Solihull Metropolitan Borough Council

Signed: Anne Brereton

Date: 29th October 2018.