



Energy Company Obligation: Help to Heat

Local Authority Flexible Eligibility Statement of Intent

Local authority: East Devon District Council

Version: 3.1

Date of publication: January 2020

Background ECO-Energy Company Obligation- is a requirement placed a few years ago on energy companies over a certain size to help improve domestic energy performance of the homes of the vulnerable. In ECO3 phase that we are entering there is a new additional facility called Flexible Eligibility. This is where the Council can set criteria to direct assistance towards local private sector homes at risk of fuel poverty, but falling outside of the normal rules of ECO (usually qualifying benefits)

1) Introduction

East Devon District Council welcomes the introduction of Flexible Eligibility (FE) and intends to utilise it for the purposes of reducing fuel poverty in East Devon.

National data indicates that there are 6,988 dwellings (11.3% of the total stock) in fuel poverty within the district. This compares with 13.2% in Devon, 12.2% in the South West and 10.6% nationally. 6% of dwellings are likely to have an excess cold hazard with a further 12% having a risk of a cold hazard.

The council runs a number of loans and grant schemes, as well as being a part of Devon-wide schemes and initiatives to tackle fuel poverty and improve housing conditions for those who are particularly vulnerable to the cold in the private sector. One of the primary objectives of the council is to remedy category 1 hazards, excess cold being one which is particularly focused on and is the result of lack of heating and insulation. East Devon District Council is taking advantage of this new Flexible Eligibility scheme so that as many residents can benefit as possible, and so that those who don't qualify through existing schemes but are in fuel poverty can obtain financial help to install key energy measures. ***It is the council's intention to consider utilising existing grant schemes and/or funding for residents who are eligible for EcoFlex and may require a 'top up' due to an identified shortfall in grant funding.***

It should be noted that the final decision on whether any individual household will benefit from energy saving improvements or heating 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 East Devon District Council is seeking to enable residents to benefit from funding and will seek the consent of households to including them in a Declaration. East Devon District Council expects any obligated energy supplier, or contractor working on their behalf to 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.

This Statement of Intent (SOI) sets out how households in East Devon will be identified and declared to be eligible for energy efficiency measures under the current ECO 3 scheme.

2) How East Devon District Council intends to identify eligible households

East Devon District Council will identify households that may benefit from flexible eligibility in a number of ways:

a. Identifying fuel poverty

East Devon District Council will utilise the Energy Savings Trust Home Analytics Data Base to target fuel poor. The Data base will also be used to target those in poor health once Health Data has been added, a project that is ongoing.

Subject to availability of resources within the Council and the legal use of data the Council will target those most in need having regard to BEIS guidance on targeting, including:

- i. Those living in private sector and in receipt of the relevant means-tested benefits and/or on a low income
- ii. Those living in energy inefficient Residential Mobile Homes who are over the age of 55
- iii. We will cross-reference data on income with data that we hold or can access on Energy Performance Certificates, prepayment meters, expenditure on fuel, housing type/age/condition, heating type
- iv. Low income households living in energy inefficient housing will be identified in the private rented sector through enforcement activity under the Housing Act 2004
- v. Household receiving help through the LEAP project
- vi. Private tenants living in properties with E.F and G EPC rating

b. Identifying low income and vulnerability to cold

East Devon District Council will target households containing people with the following characteristics, which 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 60 (55 in the case of mobile homes), and particularly those over 75
- ii. Children under 5 and pregnant mothers
- iii. Private tenants on low income living in properties with E, F and G EPC rating
- iv. Respiratory disease (COPD, asthma)
- v. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- vi. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
- 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)

Income is defined as a household's disposable income after they have paid for their rent or mortgage. The household income should include income from all sources, such as net earnings (after tax), income from savings and investments, pensions, all benefits (including housing benefit) and net council tax payments.

East Devon District City Council define 'low income' in the following table

Household composition	Annual household income	Monthly household income
Single adult	£9790	£814
Single adult plus 1 child	£12870	£1078
Single adult plus 2 children	£15840	£1320
Single adult plus 3 children	£19030	£1580
Single adult plus 4 or more children	£22110	£1848
Couple	£16060	£1340
Couple plus 1 child	£19140	£1595
Couple plus 2 children	£22220	£1848
Couple plus 3 Children	£25410	£2123

Couple plus 4 or more children	£28270	£2354
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c. Solid wall insulation "in-fill" projects

Where potential works have been identified households will be supported to take advantage of "in-fill" projects where the minimum number of vulnerable households is met.

3) Governance

Responsible officers

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

Name: Meryl Spencer (Private Sector Housing Manager) or;
Martin Prew (Private Sector Housing Technical Officer)

Telephone: 01395 571571

Email: mspencer@eastdevon.gov.uk
mprew@eastdevon.gov.uk

4) Evidence, monitoring and reporting

a. Anonymised data on the characteristics of households reached through FE will be reviewed

b. The data above will include details of households assessed, how many were deemed eligible and ineligible, and how many received heating and insulation improvements



5) Signature