

Dorset Council ECO4 Flexible Eligibility Statement of Intent

Local Authority name: Dorset Council

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Using the powers delegated in the original Statement of Intent by the chief executives of the Housing Authorities of Dorset, the Healthy Homes Dorset Steering Group has reviewed the Dorset Council Statement of Intent, and approved the following changes:

1. The eligibility criteria have been updated to reflect OFGEM ECO Flex Guidance for ECO4.
2. References to legacy councils have been removed where no longer relevant.



Rachel Partridge
Deputy Director for Public Health
Public Health Dorset
Chair
Healthy Homes Dorset Steering Group
28th November 2022

Introduction

Dorset Council (“the Council”) welcomes the continuation of Flexible Eligibility (FE) in the Energy Company Obligation ECO4, enabling local authorities to make declarations determining that certain households not receiving Affordable Warmth (“AW”) qualifying benefits can still be eligible for ECO funding. Dorset Council aims to assist delivery of Government targets raising homes to at least an energy rating of C for all fuel poor homes by 2030 and as many homes as possible by 2035, as set out in the Clean Growth Strategy.

The Council is a founder partner of the Healthy Homes Dorset programme and a partner in the Local Energy Advice Partnership (“LEAP”) scheme funded by energy companies under the Warm Home Discount (“WHD”) Industry Initiatives fund. Both schemes provide advice and assistance to residents to improve the energy efficiency of their homes.

The Council and Healthy Homes Dorset and their associated projects and delivery agents serve as the primary means of identifying homes that would benefit from a FE energy efficiency measure.

Dorset's ambitions for Flexible Eligibility (FE), and how these fit with local policies and priorities:

Fuel poverty in Dorset is comparable to the national average.

Evidence shows that poor housing conditions cause accidental injury, make existing health conditions worse, make treating health conditions difficult and have a huge social impact upon the ability of individuals to achieve their potential in education or employment. Healthy Homes are particularly important to Dorset as it has significantly more older people than most areas in England.

ECO flexibility supports Dorset's ambitions for improved health and wellbeing including reductions in excess winter death and respiratory and circulatory conditions caused and exacerbated by cold homes, improved air quality with reductions in particulates, SO_x and NO_x emissions, reduced fuel poverty and reduced emissions of greenhouse gases. It is delivered as an enhancement of the Healthy Homes Dorset Programme. This programme aims to improve the health and wellbeing of Dorset residents vulnerable to the negative health effects of living in cold homes. This programme is a key component in the local authorities' work to improve housing stock and enable people to live in their own home for longer. ECO flexibility will enable more Dorset residents that are fuel poor or vulnerable to living in a cold home to access the support they need.

The role of Dorset Council is to identify residents eligible for ECO Flex.

Dorset Council will take reasonable steps to ensure eligible residents are correctly identified according to the criteria set out in the Statement of Intent. However:

Dorset Council and Public Health Dorset have no role in deciding whether fuel suppliers decide to fund work or not and are not responsible for funding any heating or insulation improvements.

The decision on whether a household receives an ECO measure is made by the energy suppliers or their agents/contractors. Inclusion in a Certificate made by the Local Authority will not guarantee installation of measures, as the final decision will depend on:

- i) surveys carried out by suppliers' agents/contractors and installation costs calculated,
- ii) the energy savings that can be achieved for a property,
- iii) whether suppliers have achieved or are close to achieving their targets or,
- iv) other commercial considerations

1 How the Local Authority intends to identify and target eligible households

All potentially eligible households will be encouraged to apply through Healthy Homes Dorset and LEAP in order to be assessed, based on the criteria described below. Referrals from public, private, and third sector organisations working with vulnerable people and self-referrals are the primary routes for identifying relevant households. Dorset Council may, at their discretion, publicise the offer to specific relevant groups, such as those in receipt of council tax benefit or users of assisted bin collection schemes.

2 Governance:

The Healthy Homes Steering Group, chaired by Rachel Partridge, Deputy Director of Public Health, Public Health Dorset, will oversee ECO flex Certificates in Dorset. Responsibility for signing local authority Certificates will be delegated to Jon Bird, Programme Manager, Healthy Homes Dorset, Dorset Council, or other council Officers delegated to undertake the work, except in circumstances where there is a potential conflict of interest, in which case they will be referred to the Steering Group for authorisation. The Group will also periodically review the Statement of Intent and amend it as appropriate.

The signature of Certificates will be based on information collected by the organisation contracted to deliver Healthy Homes Dorset: (Currently Ridgewater Energy). Dorset Council will take reasonable steps to ensure residents are correctly identified according to the criteria set out in the Statement of Intent. However, neither Dorset Council nor Public Health Dorset, have a role in deciding whether fuel suppliers decide to fund work or not, and are not responsible for funding any heating or insulation improvements.

3 Referrals:

Referrals from public, private, and third sector workers and self-referrals are the primary routes for identifying relevant households. All potentially eligible households will be encouraged to apply through Healthy Homes Dorset to be assessed. Dorset Council may, at their discretion, publicise the project to specific relevant groups, such as those in receipt of council tax benefit or users of assisted bin collection schemes.

Referrals for ECO Flex are expected to come from the same sources as referrals to Healthy Homes Dorset: From a wide range of public, private, and third sector organisations, including health and social care organisations, citizens advice, energy advice providers, food banks, and partners of the Safe and Independent Living (SAIL) multi-agency referral scheme. Referrals can be made electronically (healthyhomesdorset.org.uk), or by phone (0300 003 7023).

In the interests of maximising uptake of Eco Flex and encouraging fair competition, while minimising the risks of encouraging rogue traders and cold callers taking advantage of Eco Flex, Dorset Council will work with the supply chain to allow bona fide PAS and Trustmark registered ECO installers to apply for Certificates of eligibility independent of Healthy Homes Dorset. HHD will not work with lead generation or marketing companies.

Organisations with ECO funding can apply for a Certificate on behalf of their clients, on the understanding that Healthy Homes Dorset (currently run under contract by Ridgewater Energy) will speak to the clients to confirm eligibility, check if the client would benefit from other services that may improve health and wellbeing, and check that clients understand that DC is issuing a Certificate that is not tied to any particular provider, and that clients should compare offers from more than one provider, especially if a client contribution is being requested. There is an administration fee of £100+VAT per measure for all ECO Flex Certificates.

Clients should be informed that they are likely to receive more than one measure under ECO4 if possible and cost-effective to do so and that a fabric first (insulation) approach is often a condition of some packages of measures under the scheme.

Dorset Council may suspend or remove this element of the pilot at any time or refuse to complete Certificates from organisations that are or appear to be not acting in the best interests of Dorset residents.

4 Evidence, monitoring and reporting:

The Healthy Homes Dorset contractor will check eligibility in their initial conversation with the resident; they will also check that the resident gives permission for their data to be stored and shared with relevant third parties. The eligibility information will be recorded on a secure customer record management system (CRM) along with copies of relevant proofs of income and benefits if applicable. The contractor will present recommendations for Certificates to be issued alongside the relevant data. The Council will supply Ofgem with the required data and receive acknowledgement from Ofgem before issuing any certificates. The Council will issue regular Certificates to its contractor setting out those households eligible. The Contractor will pass this information onto their ECO supplier according to the ECO application process.

Healthy Homes Dorset will use its secure CRM to collate information on households which are eligible for ECO flexibility. The contractor will provide Dorset Council with a monthly report detailing eligible householders and the reasons for approval. The following summarises the information to be collated to confirm eligibility:

- The EPC if already present for the householder
- A form signed by the householder confirming their income/status with relevant proof (e.g. bank statements/3 months payslips)

The form will be designed to prevent fraud. The data protection authority form will inform applicants that the Council may carry out further checks with HMRC to confirm their eligibility and may take action if a claim appears fraudulent.

The energy supplier that provides ECO funding is still required to collect all evidence associated with the necessity for a measure e.g., that the cavity wall is appropriate, the boiler is broken etc.

The Certificate of eligibility is not a substitute for this evidence and Dorset Council would expect this information to be collected and made available to Ofgem on request.

This statement sets out Dorset Council’s flexible eligibility criteria for the Energy Company Obligation (ECO4) scheme from April 2022 – March 2026.

The ECO4 scheme will focus on supporting low income and vulnerable households. The scheme will improve the least energy efficient homes helping to meet the Government’s fuel poverty and net zero commitments.

The flexible approach for Local Authorities (LAs) to identifying fuel poor and vulnerable households who may benefit from heating and energy saving measures is referred to as “ECO4 Flex”.

The Council welcomes the introduction of the ECO4 Flex eligibility routes as it helps the Council achieve its plans to improve the homes of those in fuel poverty or vulnerable to the cold. The Council is publishing this Statement of Intent (Sol), on the 28/11/2022 to confirm that each of the households declared will adhere to at least one of the four available routes outlined below:

Route 1: SAP bands D-G households with an income less than £31,000. This cap applies irrespective of the property size, composition, or region.

Route 2: SAP bands E-G households that meet a combination of two of the following proxies:

Proxy 1) Homes in England in Lower-layer Super Output Area 1-3 (LSOA)¹ Proxy

Proxy 2) Household receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates).

Proxy 3) Household vulnerable to living in a cold home as identified in the National Institute for Health and Care Excellence (NICE) Guidance. Only one from the list can be used, excludes the proxy ‘low income’.

Proxy 4) A householder receiving free school meals due to low-income.

Proxy 5) A householder supported by a LA run scheme, that has been named and described by the LA as supporting low income and vulnerable households for the purposes of NICE Guideline. Details of scheme:

Healthy Homes Dorset

Proxy 6) A household referred to the LA for support by their energy supplier or Citizen's Advice, because they have been identified as struggling to pay their electricity and gas bills.

** Note proxies 1 and 5 cannot be used together (LSOA area and LA run scheme).*

Route 3: SAP bands D-G households that have been identified by their doctor or GP as low income and vulnerable, with an occupant whose health conditions may be impacted further by living in a cold home. These health conditions may be cardiovascular, respiratory, immunosuppressed, or limited mobility related.

This is because the Council has identified a positive correlation between households who suffer from long-term health conditions and living off a low-income, with living in poorly insulated homes.

Route 4: SAP band D-G households that are referred under Route 4: Bespoke Targeting. Suppliers and LAs can submit an application to BEIS where they have identified a low income and vulnerable household, who are not already eligible under the exiting routes.

We are not currently considering this route

¹ *The English Indices of Deprivation 2019* (publishing.service.gov.uk)

Declaration and evidence check confirmation

All potentially eligible households should apply through Dorset Council or one of their approved ECO installers to ensure that they can either benefit from the scheme or be assessed for eligibility under any other relevant programme. Dorset Eco-Flex is managed and run by Ridgewater Energy, so PAS ECO installers should apply to them to register (terms, conditions and fees apply)

The officer below will be responsible for checking and verifying declarations and associated evidence submitted on behalf of the local authority:

Name: Mr Jon Bird

Job Title: Service Manager for Growth and Economic Regeneration

Telephone: 01305 221895

Email: jon.bird@dorsetcouncil.gov.uk

CEO or dedicated responsible person mandatory signature

Dorset Council will administer the scheme according to BEIS' ECO4 Order and will identify eligible households via Ofgem's application process. The CEO of the Council will oversee the process of identifying eligible households under ECO4 Flex. The eligibility information will be stored securely in line with the Council's data protection policy, Information Commissioner's Office Data Sharing Code, and BEIS guidance.

Signature:

A handwritten signature in black ink, appearing to read 'R Partridge', is shown on a light-colored background.

Rachel Partridge
Deputy Director for Public Health
Public Health Dorset
Chair, Healthy Homes Dorset Steering Group
28th November 2022

For any general enquires relating to this Sol, please contact jon.bird@dorsetcouncil.gov.uk

Appendix 1 - Examples of suitable evidence for each of the ECO4 Flex referral routes

Referral Route Evidence

Route 1: Low income

- Tax returns if within the past three months,
- Payslips from the last three months,
- Bank statements within the last three months proving income payments, including non means tested benefits,
- P45 or P60 documentation, so long as the household's annual income is visible.

Route 2: Proxy targeting

- Screenshot from the LA confirming the household is within a LSOA area, supported by Office for National Statistics (ONS) data: <https://onsdigital.github.io/postcode-lookup/>.
- Copy of council tax reduction e.g., a photo, an email, a PDF with name and address; or letter confirming reduction from LA.
- Signed, referral letter from a Doctor / GP identifying that a person living at the premises is considered to be vulnerable to the cold and suffers from a health condition as stated in the NICE guidance: NG6, excluding the low-income proxy.
- Signed letter from local coordinator / local authority that proves the household was eligible for a LA-run scheme.
- Eligibility Checking Service (ECS), documentation showing eligibility for free school meals due to low-income provided by the Department for Education or from the school.
- Signed letter accompanied by proof of gas and electricity debt from the energy supplier or Citizen's Advice, showing that the household has been referred to the LA for support with their energy bills.

PPM / non-PPM evidence (supplier provided data):

- Customer tariff data to indicate the customer's payment method.

Route 3: NHS referrals

Official letter signed by either an NHS Trust, NHS Trust Board or NHS GP.

This letter will need to state that the official signing the letter considers someone in the household to be suffering from one of the four health conditions (a cardiovascular condition, a respiratory disease, limited mobility or immune suppression).

Route 4: Bespoke targeting

N/A