

Dorset Council Statement of Intent v1.4

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 BEIS ECO Flex Guidance with income requirements aligned with more recent government instruments including Green Homes Grant Local Authority Delivery Scheme, Home Upgrade Grant, Guidance on ECO3 and proposals for ECO4.
2. The area-based eligibility retained during the delivery period of the HEAT Melcombe Regis scheme has now been removed now that programme delivery is nearing completion, bringing the SOI into line with BEIS guidance advising against area-based eligibility criteria. Claims under the previous version of the SOI will still be accepted for 60 days from the date of publication of this version of the SOI.
3. References to legacy councils have been removed where no longer relevant.

A handwritten signature in black ink, reading 'R Partridge', is centered on a light grey rectangular background.

Rachel Partridge
Deputy Director for Public Health
Public Health Dorset
Chair
Healthy Homes Dorset Steering Group
5 May 2022

Appendix 2: Statement of Intent v1.4 incorporating modifications authorised January 2022:

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Introduction

Dorset Council (“the Council”) welcomes the continuation of Flexible Eligibility (FE) in the Energy Company Obligation (ECO) phases 3 and 4, enabling local authorities to make declarations determining that certain households not receiving Affordable Warmth (“AW”) qualifying benefits can still be eligible for 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”). 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, and iii) whether suppliers have achieved their targets or require further measures to meet their ECO targets.

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.

1.1 Criteria for identifying eligibility

ECO Flex will be available to private sector households, both owner occupiers and private tenants, in line with Government guidance and ECO regulations, in summary:

- Owner Occupied premises where household is Fuel Poor (FP) or Low Income and Vulnerable to the Cold (LIVC);
- A to E Private rented premises, where household is FP or LIVC, but installation measures are not the replacement or repair of a boiler, electric storage heater or central heating system that has broken down;
- F, G or unrated private rented premises, where household is FP or LIVC and installation measure is only solid wall insulation or a renewable heating measure;
- In-fill Specific targeting for F and G Properties under LA Flex EPC
- Band F and G Private Rented Properties are not eligible under LA Flex, except for solid wall insulation or renewable heating measures as landlords are responsible for meeting these standards under the Domestic Minimum Standards

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

The criteria for identifying Fuel Poor eligible households are (1) Low income **and** (2) high heating costs

The criteria for identifying Low Income and Vulnerable to the Cold eligible households are (1) Low income **and** (2) one or more residents vulnerable to the health problems associated with a cold home

1.1.1 Low Income criteria:

The Council intends 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 (non-AW 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 whichever is the higher of:

BEIS Sustainable Warmth eligibility criteria (currently £30,000)

ECO3 Child Benefit self-declaration form with a 10% uplift to account for the high cost of housing in Dorset:

The Healthy Homes Dorset Steering Group will approve changes based on any updates to BEIS guidance and/or evidence that the suggested rates are not appropriate. The council has chosen to use thresholds based on total income rather than income after housing costs for reasons of practicality and efficiency when assessing household income.

Table 1 – Income thresholds

Household composition	Total Household Income
1 adult	£ 30,000
and 1 child	£ 30,000
and 2 children	£ 30,000
and three children	£ 30,250
and four or more children	£ 35,200
2 adults	£ 30,000
and 1 child	£ 30,000
and 2 children	£ 33,000
and three children	£ 37,950
and four children	£ 42,900

All private sector households in receipt of means-tested benefits not included in the broader AW criteria are also eligible for FE. These are:

- Housing Benefit
- Pension Credit (Savings Credit)
- Council Tax Support (excluding Single Person Discount)

The Councils 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, particularly residents and their families who serve or have served in the armed forces: Dorset Councils actively support the Armed Forces Covenant, a promise from the nation that those who serve or have served in the armed forces and their families are treated fairly.

1.2 high heating costs

A home with one or more of the following characteristics is considered to have high heating costs:

- A valid EPC rating of D, E, F or G (D and E only if the home is privately rented)
- The home has no or a maximum of 100mm loft insulation
- The primary heating source for the home is not a mains natural gas central heating system or heat pump
- 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 a park home located on a licensed residential park home site licensed for year-round residential use
- 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 annual household fuel bill is more than £1300, the household will also be classified as having high heating costs.

1.3 Criteria for identifying one or more residents vulnerable to the health problems associated with a cold home:

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 (1.1.1) 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), recommendations from Booster Fund projects and the LEAP eligibility criteria. These are as follows:

- 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)
- Victim of domestic violence
- Recent bereavement

- Moving in and out of homelessness
- Recent immigration or asylum seeker living in private tenure
- Physical or sensory disability
- A medical exemption certificate (Medical or War Pension Exemption)
- Pregnant women
- People with addictions
- 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).

Privately Rented properties with an EPC rating of D or E: 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 for tenants in lowrated privately rented properties. Accordingly, in line with BEIS FE Guidance 2019 recommendations and Clean Growth Strategy national targets to raise EPC ratings, the tenant of any privately rented property with an EPC rating of D or E is eligible for Declarations under this Sol

Declarations for non-ECO-funded works The Council is a partner in fuel poverty schemes operating in the area covered by this Sol that include ECO-Flex eligibility in their own eligibility criteria, even though they do not utilise ECO funding. These schemes include the Warm Homes Discount-funded ‘Emergency Central Heating Offer’ (ECHO) and National Grid-funded Warm Homes Fund, providing first time central heating. To facilitate works under these schemes, the Council will issue Declarations for ECO-Flex eligible properties when appropriate.

1.4 Any details of scheme requirements for SWI “in-fill” projects:

The Healthy Homes Dorset Steering Committee will keep a watching brief on the situation and approve changes based on evidence of demand and BEIS guidance.

2 Transitional arrangements:

Applications for Certificates that comply with the previous version of the Statement of Intent (v 1.3) eligibility requirements will be signed for the first 60 days of the validity of this version.

This version will be replaced by a new version when the requirements of ECO4 are clear. Any transition timeline will be established once government requirements are known.

3 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 County Council, 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.

4 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 bureaux, 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 organisations to apply for Certificates of eligibility independent of Healthy Homes Dorset.

Organisations with ECO funding can apply for a Certificate on behalf of their clients, on the understanding that Healthy Homes Dorset 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 £50 per address for all ECO Flex Certificates.

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.

5 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. As part of this assessment residents will also be invited to complete a Safe and Independent Living (multi-agency referral service) form. The eligibility information will be recorded on a secure customer record management system (CRM). The contractor will present recommendations for Certificates to be issued alongside the relevant data. 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
- Safe and Independent Living (multi-agency referral scheme) form if used for referral
- A self-Certificate form signed by the householder confirming their income

The self-Certification 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. This self-Certificate and fraud prevention system is analogous to that used for medical prescriptions.

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.