



**Portsmouth City Council
ECO Flexible Eligibility Statement of Intent
Version 4**

29/11/2019

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1.0 Introduction

1.1. This Statement of Intent sets out how Portsmouth City Council (PCC) will utilise local authority ECO Flex Funding, in accordance with guidelines from the Department for Business, Energy and Industrial Strategy, to declare households eligible for ECO funding where they might not fall into the existing criteria of 'low income', but are felt to be vulnerable to the effects of cold.

1.2. ECO aims to provide funding to low income households and/or residents with health conditions and other vulnerabilities. Cold homes have been linked with a range of health conditions, including respiratory health, strokes, hospital admissions and implications on mental health¹. PCC wishes to utilise Flexible Eligibility to its fullest to mitigate the effects of fuel poverty and improve the health and wellbeing of their residents.

1.3. In Portsmouth there are a total of 88,263 households, of which over 11,000 (12.1%) are in fuel poverty². This will increase as fuel prices rise, which they are predicted to do over the coming years³. Previous research has shown that the highest proportion of fuel poverty was found in the private rented sector and was associated with those households on a means tested benefit. Fratton and Southsea wards in Portsmouth had the highest fuel poverty rates.

1.4. There are an average of 125 excess winter deaths within Portsmouth according to the Office for National Statistics. Excess winter death rates are defined as the deaths occurring in the winter period, December to March, compared to the rest of the year.

1.5. ECO Flexible Eligibility will contribute towards the aims of the Council's Corporate Strategy, Energy and Water at Home Strategy, Joint Health and Wellbeing Strategy, Environmental Sustainability & Climate Strategy and Economic Strategy. This includes: enabling financial assistance to vulnerable and low income owner occupiers, reducing carbon emissions from the domestic sector, improving the numbers of energy efficient, safe, healthy and affordable homes to live in strengthening the local economy.

1. PHE: (2014) Local action on heat inequalities evidence review 7

2. DECC (2016) Sub-regional fuel poverty

3. BEIS (2016) Fossil Fuel Assumptions

4. ECO: Help to Heat Flexible Eligibility 2017 p1.

1.6. To ensure that we can reach a wide and varied selection of homes within the Private Sector across the City, and are able to continue our important progress towards our goal of achieving a significant reduction in energy use in domestic homes across the City, it is important to continue and further develop our work with partners and use a number of different channels to ensure we reach out to all of our residents in a joined up and effective way. Some of our partnerships working to mitigate fuel poverty in the private sector are listed below:

- *Local Energy Advice Programme (LEAP)*; utilised by a large number of local services, charities and organisations throughout the city offering advice on energy efficiency, fuel bills, and switching.
- *Emergency Central Heating Offer (ECHO)*; offers emergency boiler installations within 10 working days when an eligible household is in a 'no heat' situation.
- *Warmer Homes*; provides fully funded gas central heating systems (and gas connections, if required).
- *PCC's Fuel Poverty Working Group* also assists joint working across relevant sectors in the city; pulling together partners from Adult Social Care, Housing, Public Health, Citizens Advice, Charities and other organisations.

2.0 ECO Flexible Eligibility

2.1. ECO Flexible eligibility is available to private sector households, including owner occupiers and private tenants, in line with the Government's guidance⁴.

2.2. It should be noted that inclusion in a declaration authorised by PCC will not guarantee installation of measures or fully funded works, as the final decision on whether any individual household can benefit from energy saving improvements via ECO funding will depend on i) survey 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 their targets or require further measures to meet their ECO targets.

Potentially eligible households will need to apply through Portsmouth City Council's Energy Services Team in order to be assessed (Phone 0239 284 1947 or email: energysaving@portsmouthcc.gov.uk). The Energy Services Team will check eligibility in their initial conversation with the resident; they will also check that the resident is happy for their data to be shared with scheme partners. Portsmouth City Council will issue regular Declarations to our Delivery Partners setting out those households that are eligible. The Delivery Partners will pass this information onto their ECO supplier through the ECO application process.

2.3. Portsmouth City Council will use the following eligibility criteria to identify eligible households that may benefit from the installation of measures under 'Flexible Eligibility'.

Eligible residents will fit the following criteria for either 'Low Income High Cost and vulnerable to cold' or 'Fuel Poor'.

Portsmouth City Council will assess eligible residents to be 'Low Income High Cost (LIHC) and a vulnerability to cold' from the following criteria:

- i) To determine 'low income', the household will either be in receipt of an ECO-qualifying income related benefit or the household has an annual income of less than £35,000 after paying rent/mortgage, council tax and utilities bills.
- ii) To determine 'high cost', eligible households will have an Energy Performance Certificate (EPC) rating of 'D' or lower. In the event that a property does not have an EPC, PCC will use their existing household composition scoring table to determine a high cost home.

The below category of housing will be considered eligible, based on their tendency to have high energy bills and be hard to treat:

- Park homes and permanent caravans (regardless of income)

Portsmouth City Council manages a number of Ofgem accredited fuel poverty mitigation schemes available across the Portsmouth area. Eligibility criteria for the schemes include criteria based on health conditions, of which many could be exacerbated by living in a cold home, as well as criteria based on other vulnerabilities which could increase the likelihood of the household falling into fuel poverty. From our existing scheme criteria, the below have been selected by Portsmouth City Council as deeming a household eligible under flexible eligibility:

Portsmouth City Council will assess eligible residents to be 'fuel poor' if they meet one or more of the following criteria:

- In receipt of any means tested benefit.
- In receipt of disability-related benefit, including Disability Living Allowance (DLA), Personal Independence Payment (PIP) or Attendance Allowance.
- On the Energy Companies' Priority Services register (those at most risk from the effects of a power cut).
- Has a pre-existing long term chronic condition such as: heart disease, stroke or transient ischaemic attack (TIA), asthma, chronic obstructive pulmonary disease (COPD) or diabetes.
- Has dementia, learning disabilities or mental ill-health that reduces individual's ability to self-care
- Has a health condition that can be exacerbated by living in cold including,
 - i. cardiovascular conditions, ii. respiratory conditions (in particular, chronic obstructive pulmonary disease and childhood asthma), iii. mental health conditions, iv. disabilities, v. terminally ill, vi. suppressed immune systems (e.g. from cancer treatment or HIV)
- Aged 60 and over
- Is pregnant.
- Responsible for a child under 15 living at the property.

In exceptional cases, not meeting the requirements above under both categories will be considered by Portsmouth City Council on a case by case basis.

3.0 Governance Officers responsible for signing “Local authority declarations”

3.1. Governance Officers responsible for signing “Local authority declarations” are Portsmouth City Council's Energy Services Team Manager Andrew Waggott, Graduate Energy Officers Antonia Lindup & Louise Hyde, and Energy Assistant Magdalena Taborska-Crowther.

4.0 Referrals

4.1. Portsmouth City Council will identify eligible households through various routes: - This could result from residents phoning or emailing the Help Desk, Energy Services Team, from a frontline worker or following marketing such as the below:

- General marketing: including advertising or editorial in the Council's magazine to residents
- Messages on social media or in newsletters
- Delivery Partner leafleting to properties near those with installations being carried out.
- Leaflets to community venues
- Libraries or community events
- Via LEAP
- Presentations to frontline workers or groups

4.2 In order to target its marketing towards those households that are vulnerable to the effects of cold, we will work closely with Public Health to identify routes to vulnerable households.

4.3 Training will be given to frontline Council staff and other agencies to referral, including housing and environmental health staff, health and social care workers, Telecare and Home Safety team, Age UK and CAB; in order to make them more able to identify those in risk of fuel poverty.

5.0 Evidence, monitoring and reporting

5.1 All evidence, monitoring and reporting will be undertaken through contract management procedures which will be put in place with installers. This will include: a) Data collection and the mechanisms for monitoring the effective targeting of relevant households; b) Monitoring which households of those targeted have subsequently received a measure; c) The method and frequency with which information is reported to those with governance and decision-making responsibilities; d) The auditing of data collection and the monitoring mechanism; and e) The use of controls to deter, prevent and detect fraud.

Signature..... (Director of Housing, Neighbourhood & Building Services)