#### **Energy Company Obligation**

#### Local Authority Flexible Eligibility Statement of Intent

Local authority: London Borough of Hounslow

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#### 1) Introduction

The London Borough of Hounslow welcomes the introduction of Flexible Eligibility (FE) and intends to utilise it for the purposes of reducing fuel poverty in the borough.

In the Council's 'Housing Strategy 2014 –2018', objective 5 is "to create a cleaner, safer and greener living environment for our communities". One of the priorities identified under this objective states that 'Fuel poverty is a concern with both the economic downturn and rising fuel costs resulting in cold homes. Pensioners aged 65+ are particularly vulnerable to health risks associated with fuel poverty and cold homes'. The Strategy outlines that it planned to 'work innovatively with existing and new partners to tackle the causes and effects of fuel poverty, including making residents aware of sources of help, such as Winter Fuel Payments and potential access to Energy Company Obligation and Green Deal funding'.

We wish to make it clear that the final decision on whether any individual household can benefit from energy saving improvements rests with obligated energy suppliers or their contractors. Inclusion in a Declaration issued by us to a supplier will not guarantee installation of measures. The final decision will depend on i) the survey carried out by suppliers' 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 Energy Company Obligation targets. Where funding is available from within the Local Authority to enable works to take place, for example through local carbon offset funds, this will be considered.

The London Borough of Hounslow expects any obligated energy supplier, or contractor working on their behalf, to comply with the Data Protection Act, to follow Ofgem's requirements for the Energy Company Obligation Help to Heat, and to act in accordance with industry best practice in relation to customer care and quality standards of any works that may take place.

This Statement of Intent is intended to support the London Borough of Hounslow's partnership with the London Borough of Islington, who will sign declarations on our behalf.

## 2) How we intend to identify eligible households

The London Borough of Hounslow will delegate responsibility to identify households that may benefit from flexible eligibility to the London Borough of Islington. The route by which residents are identified will follow the methodology for assessment as set out in the Statement of Intent for the London Borough of Islington.

Where resources allow, we will identify households that may benefit from FE in a number of ways:

a. Identifying fuel poverty

We will rely on targeted means of identifying those most in need.

- i. Where the legal use of data allows, we will identify those living in private sector and in receipt of the relevant means-tested benefits
- ii. We will cross-reference data on income with data that we can hold or access on Energy Performance Certificates and on the private rented sector
- iii. Low income households living in energy inefficient housing will be identified in the private rented sector through enforcement activity under the Housing Act 2004
- iv. Individuals in fuel poverty will be identified though the London Borough of Islington's extensive fuel poverty referral network, SHINE London and through the London Borough of Hounslow's 'Better Homes, Better Health' scheme (see Section 4)
- v. Particular efforts will be made to reach low income households in older dwellings
- vi. Combining data on prepayment meters with tenure data
- vii. Promoting the scheme to low income council leaseholders
- b. Identifying low income and vulnerability to cold

The Seasonal Health Interventions Network London [SHINE London] (see Section 4) provides an effective means of identifying vulnerable household through a large and well-established referral network. Through this network we intend to target those households containing people with the characteristics below. These are aligned with 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, 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)

The presence of some of these diseases will not in itself mean that someone is extremely vulnerable but a scoring matrix has been developed to weight certain characteristics and referrals from health and social care services will be given more weight. Health and social care teams working with the above groups will continue to be engaged.

c. Solid wall insulation "in-fill" projects

SHINE London will support households to take advantage of "in-fill" projects where the minimum number of vulnerable households is met. This will involve contacting neighbouring properties to ascertain their eligibility.

## 3) Governance

a. Responsible Officer

The Officer below will be responsible for signing Declarations on behalf of the London Borough of Hounslow.

Job title: Senior Energy Advice Officer (London Borough of Islington) Telephone: 020 7527 2121 Email: energy.advice@islington.gov.uk The London Borough of Islington's Statement of Intent contains details of the decision-making organogram overseeing the process of identifying eligible households under flexible eligibility. See: http://www.energyadvice.islington.gov.uk/energy-grants/other-grants/

## 4) Referrals

## a. Referral network

SHINE London was established in January 2017 and takes a holistic 'one stop shop' approach to seasonal health, with one referral leading to an assessment for almost 30 different interventions. Residents are either referred by third parties such as local health, social care, housing services and voluntary sector organisations or can directly contact SHINE themselves.

Any individual seeking to access the flexible eligibility arrangements will need to be referred through SHINE London: Telephone: 0300 555 0195 Email: contact@shine-london.org.uk Online: www.shine-london.org.uk

The London Borough of Hounslow will also utilise their 'Better Homes, Better Health' (BHBH) scheme to generate leads of potentially eligible properties for funding. BHBH provides a free package of support to help eligible Hounslow residents improve their homes, keep warm and save money on energy bills. The service has been commissioned for the last four years and delivers circa 600 annual home visits by trained energy advisors to eligible residents – with the aim of reducing fuel poverty, promoting well-being and reducing incidences of ill-health during winter. Online: https://www.hounslow.gov.uk/info/20086/about\_your\_tenancy/1259/better\_homes\_better\_health

b. Information flows with suppliers/contractors

Declarations will be passed to suppliers/contractors through secure data transfer. In turn they will be expected to provide information on the outcomes of these, including the nature and date of works completed.

# 5) Evidence, monitoring and reporting

The London Borough of Islington will collect all data on behalf of the London Borough of Hounslow. This information will be used to evaluate Hounslow's approach to flexible eligibility, to determine if the criteria requires amendment and to inform future policy and schemes. It will form the basis of an annual report required by the Department of Business, Energy and Industrial Strategy (BEIS) to determine the success of Local Authority Flexible Criteria.

- a. Anonymised data on the characteristics of households reached through FE will be reviewed and reported to an appointed Hounslow Officer on a quarterly basis
- 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
- c. All households for whom Declarations were made will be contacted by SHINE London after three months to review their experience of the process
- d. The two-stage approval process for Declarations, case review process and Hounslow Officer review will act to deter, prevent and detect fraud.

6) Signature

Peter Matthew Director of Housing, London Borough of Hounslow