Energy Company Obligation ECO3 Affordable Warmth Lewisham Statement of Intent on Flexible Eligibility



Local authority: Lewisham Council

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URL: https://lewisham.gov.uk/myservices/environment/environment/energyefficiency/taking-the-lead

1) Introduction

Lewisham Council supports the use of Flexible Eligibility as a means for enabling locally driven solutions to fuel poverty.

Fuel poverty is an important local priority and the Council has been able to use Flexible Eligibility to work in partnership locally and with neighbouring boroughs to connect vulnerable households with support.

The Council will look to work with energy suppliers and their partners delivering the ECO3 obligation. While the Council would welcome the opportunity to determine allocation of funding it should be noted that final decisions on whether any individual household will benefit from energy saving improvements 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.

In identifying households as eligible under flexible eligibility Lewisham Council is seeking to enable residents to benefit from funding. Lewisham 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.

Where resources allow, Lewisham Council is willing to work with other London boroughs to deliver flexible eligibility under the provisions for delegation set out in the BEIS guidance on Flexible Eligibility. The South East London Fuel Poverty partnership was set up in 2018 in order to allow resources to be pooled across the public and community sectors to work at scale in addressing this issue.

2) How Lewisham Council intends to identify eligible households

This section sets out the criteria that will be applied in identifying eligible households under Flexible Eligibility, subject to availability of resources within the Council and the legal use of data.

a. Criteria for identifying households in fuel poverty

Households will be identified as being in fuel poverty where they meet the thresholds of low income and high energy costs set out below.

Low income households are defined as:

Household type	Inner Gross	Inner Net	Outer Gross	Outer Net
Single working age	£30,455	£24,027	£26,845	£21,579
Couple working age	£43,387	£36,171	£37,450	£32,172
Single pensioner	£17,831	£17,939	£13,141	£16,748
Couple pensioner	£27,654	£24,862	£17,355	£22,318
Lone parent, one child aged 0-1	£56,628	£41,101	£48,087	£36,871
Lone parent, two children aged 2-4 and primary	£67,058	£46,768	£61,346	£43,464
Lone parent, three children aged 2-4. primary and secondary	£78,298	£53,269	£72,585	£49,965
Couple, one child aged 0-1	£58,617	£47,575	£53,242	£43,931
Couple, two children aged 2-4 and primary	£65,752	£53,126	£61,691	£50,372
Couple, three children aged 2-4, primary and secondary	£75,071	£60,158	£71,010	£57,404
Couple, four children aged 0-1, 2-4, primary and secondary	£110,455	£81,392	£94,344	£73,744

Source: Minimum Income Standard for the UK, 2018, Joseph Rowntree Foundation

Any household in receipt of Council Tax Reduction (as a means tested benefit not included in the list of ECO 3 qualifying benefits) is also deemed to meet the threshold of low income.

A household facing high energy costs is defined as one or more of the following:

Indicator	Definition	Value
1	Greater than 80% of average London domestic energy bill	£988
2	Below the fuel poverty strategy target EPC Band	EPC D-G
3	No gas central heating Gas boiler below 86% efficiency Central heating not working Main heating electric	n/a
4	Household using a pre-payment meter	n/a

Sources: Annual Domestic Energy Bills, September 2018, BEIS; Cutting the cost of keeping warm: a fuel poverty strategy for England, 2015, DECC

b. Identifying low income and vulnerable to the effects of living in a cold home

The following describes the criteria that will be used to identify households as being low income and vulnerable to the effects of living in a cold home.

Low income is as set out in part a) above.

Criteria that will be used to identify a household as vulnerable to the cold include:

Vulnerability: illness

A household with one or more occupants who correspond to the vulnerabilities outlined in the National Institute for Health and Care Excellence (NICE) 2015 guidance on excess winter deaths and illness caused by cold homes

Respiratory: chronic obstructive pulmonary disease; asthma

Cardiovascular: ischaemic heart disease; cerebrovascular disease

Immunodeficiency: HIV

Neurological conditions: Alzheimer's disease; vascular dementia; other forms of dementia: Parkinson's disease

Moderate to severe mental illness: schizophrenia; bipolar disorder; moderate to severe depression or anxiety disorder

Substance abuse

Autoimmune disease, cancer and neurobiological disease: lupus; multiple sclerosis;

diabetes; rheumatoid arthritis; cancer; fibromyalgia; ME

Haemoglobinopathies: sickle cell disease; thalassaemia

Limited mobility; osteoarthritis; other musculoskeletal conditions

Severe learning disabilities

Severe sensory impairment

Vulnerability: age

Household with one or more under 5s (including pregnant mother)

Household with one or more persons aged 70+

Vulnerability: other

Households referred through Lewisham advice and referral service for fuel poverty

People who move in and out of homelessness

Anyone who has attended hospital due to a fall

Recent immigrants, asylum seekers and refugees

Sources: Guideline NG6: Excess winter deaths and illness and the health risks associated with cold homes, 2015, NICE; A new definition of fuel poverty in Scotland: review of recent evidence, Scotlish Government, 2017

c. Solid wall insulation "in-fill" projects

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

3) Acting on behalf of other local authorities

Lewisham Council will be making declarations of flexible eligibility on behalf of: Bexley Council https://www.aleo.org.uk/forum/viewtopic.php?f=89&t=1135
Bromley Council https://www.aleo.org.uk/forum/viewtopic.php?f=89&t=1158
Greenwich Council

http://www.royalgreenwich.gov.uk/downloads/file/3571/energy company obligation statement of intent

Southwark Council https://aleo.org.uk/forum/viewtopic.php?f=89&t=1210

These boroughs have outlined how they are delegating responsibility for determining flexible eligibility to Lewisham Council in their respective Statements of Intent.

4) - Governance

Responsible officer

The primary officer responsible for signing Declarations on behalf of the local authority is:

Job title: Climate Resilience Manager

Telephone: 020 8314 6605

Email: martin.o'brien@lewisham.gov.uk

Should the Climate Resilience Manager be unavailable, the Council's Sustainability Manager will deputise. The Council's Sustainable Development Select Committee will review the Council's delivery on flexible eligibility on an annual basis.

5) Referrals and delivery

Lewisham Council has established a partnership with South East London Community Energy¹ that is intended to create a long-term sustainable local referral route for households eligible for energy company funded measures. This partnership will be the Council's main route for identifying and referring households to ECO obligated parties. Any individual or organisation seeking to use the flexible eligibility arrangements or the Council's endorsement in relation to Flexible Eligibility will be expected to use the partnership arrangements as the referral route, and should in the first instance contact the responsible officer identified above.

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¹ http://selce.org.uk/

6) Evidence, monitoring and reporting

- A copy of all declarations issued by Lewisham Council will be retained
- A record of evidence collected through the partnership with South East London Community Energy will be retained
- Lewisham Council will provide a report to BEIS that reflects the reporting requirements suggested in the BEIS guidance on Flexible Eligibility that also covers all of the boroughs Lewisham has delegated responsibility to sign declarations for.

The data above will be retained for the 3 year period recommended in the BEIS guidance, subject to any restrictions required by Lewisham's Information Management Team.

7) Signature

Mingh 18/3/2019 **Kevin Sheehan**

Executive Director for Customer Services

Lewisham Council