

TELFORD & WREKIN COUNCIL

CABINET – 9 JULY 2020

BETTER HOMES FOR ALL

REPORT OF: Director - Housing, Employment & Infrastructure

LEAD CABINET MEMBERS – Cllr D Wright, Cabinet Member for Housing, Transport and Infrastructure & Cllr R Overton, Deputy Leader and Cabinet Member for Enforcement, Community Safety and Customer Services

PART A) – SUMMARY REPORT

1. SUMMARY OF MAIN PROPOSALS

- 1.1 The Council Programme to 'Protect, Care and Invest to Create a Better Borough' was approved in January 2020 and made a clear commitment to give residents access to suitable housing. Our plans to achieve this are set out in our new overarching Housing Strategy. One of the strategy's key objectives is '**making BEST use of our existing homes**' as 80% of the homes that we will have in 20 years time are already built. This report sets out how the Better Homes for All programme has directly contributed to this objective in relation to the private rented sector, and how the programme will be developed to cover all housing tenures.
- 1.2 Over the past 2 years, Better Homes for All has delivered a range of measures to improve housing standards in the private rented sector. Our aim has been to take a balanced approach to 'Educate, Encourage and Enforce'. We have targeted our resources to support the most vulnerable tenants whilst also taking action against rogue landlords who persistently and wilfully fail to meet their legal responsibilities.
- 1.3 Significant progress has been made including:
- **Licensing more than 200 Houses in Multiple Occupation (HMO)** with 2 prosecutions to address poorly managed HMOs;
 - **Ensuring compliance with more than 400 enforcement notices** to bring properties in the private sector up to standard.
 - **Issuing the first Banning Order in England**, preventing the landlord concerned from working in the property industry for up to 5 years;
- 1.4 Our Neighbourhood Enforcement Officers have continued to tackle all aspects of Anti Social Behaviour in communities and this will be the subject of a separate report to Cabinet in September.

1.5 This report sets out proposals to maintain and broaden the scope of Better Homes for All programme to make best use of and improve the quality of existing homes across all tenures. For 2020/1, we are proposing to focus on two new priority areas, as set out in Section 5 of this report:

- **Bringing long term empty residential properties back into use.**
- **Tackling fuel poverty across the Borough by increasing the take-up of energy efficiency schemes and funding.**

1.6 The Covid 19 crisis is impacting across our communities with many residents facing financial hardship. Over the coming months more people may be unable to pay their rent potentially facing eviction once the current moratorium ends at the end of August. We are encouraging people to come to us early before they lose their property so we can support them sustain their tenancy engaging with their landlord and through Better Homes for All ensuring that they are being treated fairly and taking appropriate enforcement action where necessary.

2. RECOMMENDATIONS

2.1.	To note the continued progress outlined in Section 4 of this report.
2.2	To approve the recommended next steps set out in Section 5 of the report specifically 5.1.3 and 5.2.2 along with the Statement of Intent set out in Appendix A of the report outlining our approach to Empty Properties in our borough and Improving Energy Efficiency to help address fuel poverty.
2.3	To grant delegated authority to the Director: Housing, Employment & Infrastructure in consultation with the Lead Cabinet Members for Housing, Transport and Infrastructure & Enforcement, Community Safety and Customer Services, to take the necessary steps to implement these recommendations.

3. SUMMARY IMPACT ASSESSMENT

COMMUNITY IMPACT	Do these proposals contribute to specific Co-Operative Council priority objective(s)?	
	Yes	- Support communities and those most in need and work to give residents access to suitable housing - Improve health and wellbeing across Telford & Wrekin - Keep neighbourhoods safe, clean and well connected
	Will the proposals impact on specific groups of people?	
	Yes	Borough wide impact however more focused towards private sector landlords, letting agents
TARGET COMPLETION /DELIVERY DATE	The Better Homes for All programme is already in delivery. The recommended next steps in Section 5 are to be implemented and subject to review at end March 2021.	
FINANCIAL/	Yes	A number of the actions detailed in Section 4 to improve standards in the

<p>VALUE FOR MONEY IMPACT</p>		<p>private rented sector, increase support for tenants and landlords and improve standards through targeted enforcement are supported by MHCLG grant monies in addition to the Council's own funding. Consideration of further funding in the future will need to be assessed prior to these grants ending in 2021. In respect of the elements of the programme detailed within Section 5:</p> <ul style="list-style-type: none"> • The statement of intent will facilitate a widening of eligibility for funding of energy saving measures for those households suffering fuel poverty; • The fuel poverty post and initiatives will be funded from £100k approved as part of the 2020/21 Service & Financial Planning strategy; • Capacity funding has been provided to fund an Empty property enforcement officer over the next two years. In addition, there is £150k funding within the Councils capital programme that is provided in the form of loan finance to enable properties to be brought back into use. The implementation of these actions will improve outcomes for vulnerable people within our community and facilitate wider cost benefits to the public sector potentially through a reduction in crime and exploitation, a reduction in homelessness, provision of a safer environment and the improvement of public health outcomes. <p>AEM 15.06.20</p>
<p>LEGAL ISSUES</p>	<p>Yes</p>	<p>The Council does not have a statutory duty to operate an ECO flexible eligibility scheme. However, the council can choose to use its discretionary power in doing so and if it chooses to use this power, then it must publish a statement of intent (SOI).</p> <p>Where a local authority has published a SOI the Electricity and Gas (Energy Company Obligation) Order 2014 allows energy suppliers to install energy saving measures in homes as part of their ECO targets. In order for this to take place the local authority has to make a statement in writing that, in the opinion of the local authority the premises are occupied by a household living on a low income and vulnerable to the effects of living in a cold home; or that the premises are occupied by a household living in fuel poverty.</p> <p>Once a SOI is published, this provides the eligibility criteria that the council will use to allow it to issue such a written declaration.</p> <p>As the declaration will be shared with energy suppliers consent of the household must be obtained before any</p>

		<p>personal information is shared in accordance with the Data Protection Act 1998.</p> <p>In respect of enforcement of housing standards, Legal Services will continue to provide advice and assistance to officers and carry out prosecution of offenders or secure banning orders to prevent rogue landlords from managing properties.</p> <p>Any legal issues arising from implementation of the programme of work as set out will be considered by Legal Services.</p> <p>PM 12/02/2020</p>
OTHER IMPACTS & RISKS	No	The risks and opportunities relating to Better Homes for All are outlined within the report.
ENVIRONMENT IMPACT	Yes	The Climate Emergency declaration was resolved with all party support at Full Council in July 2019 due to concerns about the impact of climate change and the urgent need for action. The actions in Section 5 of this report relating to improving the energy efficiency of the Borough's existing housing stock will make a positive contribution to reducing carbon dioxide emissions in the Borough. For example, any new gas boilers installed will be required to have an energy efficiency rating of A or B with a carbon footprint of up to 230gCO ₂ eq/kWh compared to up to 380gCO ₂ eq/kWh for an older boiler (Source: Parliamentary Office of Science and Technology Research Paper) and cavity wall insulation can reduce carbon dioxide emissions by >1,000kg per annum for a 4-bed detached house
IMPACT ON SPECIFIC WARDS	No	Borough-wide impact

PART B) – ADDITIONAL INFORMATION

4. Improving standards in the private rented sector

4.1 Background

- 4.1.1 The private rented sector is a key and increasing component of our local housing market, with the number of people living in the private rented sector having more than doubled in the last twenty years. Between March 2018 and March 2019 alone there was a 13% growth in the number of rental properties within the Borough, with this growth being experienced across all property sizes.
- 4.1.2 The sector is diverse and ranges from single property owners to portfolio landlords. There has been a recent growth in large scale private rented provision. The Council has also directly delivered in relation to this through its wholly owned housing company Nuplace Ltd, who now have 420 homes either complete or under construction. Nuplace, along with other local exemplar landlords and letting agents, have helped to raise standards within the private rented sector, both in terms of property condition and management practice.

- 4.1.3 Despite this, some private landlords and letting agents were failing to meet minimum requirements, therefore our Better Homes for All programme was launched in February 2018. The Council successfully secured funding for two years from the Ministry of Housing, Communities and Local Government (MHCLG) to establish the programme. We are now mainstreaming this intelligence-led approach into our core team in order to ensure that we continue to proactively target resources where they will have the greatest impact.
- 4.1.4 Better Homes for All has been underpinned by an “Educate, Encourage, Enforce” approach. Advising landlords and letting agents, supporting accreditation and local landlord associations, and encouraging market professionalism, have been equally as important as stepping up enforcement.
- 4.1.5 In line with our new Housing Strategy, Better Homes for All has also focused on increasing support for tenants renting in the private sector, particularly the most vulnerable.

4.2 Progress update

Increasing support for tenants and landlords

- 4.2.1 The Council has provided advice to tenants on a broad range of issues, such as eviction notices, rent accounts and security of tenure. We also support tenants who have been illegally evicted or have suffered harassment from their landlord.
- 4.2.2 We have been able to increase the support we provide to tenants most at risk of exploitation through a new vulnerability support project. This project specifically targets tenants who have been exploited by criminal landlords. Between April-December 2019, the project received 69 referrals and supported an additional 19 households connected with the first Banning Order in England, of which 24% were victims of criminal exploitation.
- 4.2.3 We have delivered 5 Area Activity Days in our urban housing estates. The aim of these days is to raise the profile of support available and help residents understand our service and their rights to safe, secure accommodation.
- 4.2.4 We have appointed two new Tenancy Sustainment Officers to provide targeted support to clients with complex needs to help them sustain a long-term tenancy. Between July-December 2019, these officers supported 224 clients. This support is over and above the advice and support that is given to anyone who is homeless or at risk of becoming homeless, which includes a personalised housing plan, individual to each client’s needs.
- 4.2.5 We continue to support landlords and letting agents through the Telford & Wrekin landlord accreditation scheme, which currently has 92 members. This provides advice, guidance and training for landlords and letting agents and assurance to tenants that an accredited landlord’s properties will be managed in accordance with an agreed code of conduct.

Improving standards through targeted enforcement

- 4.2.6 We have received over 800 service requests from tenants reporting repairs, or complaining about their landlords, over the last 12 months. This included 97 referrals as a result of our “**Report a Rogue**” campaign.
- 4.2.7 We have been successful in gathering intelligence by working in partnership with West Mercia Police, Shropshire Fire and Rescue Authority, The Home Office, Her Majesty’s Customs and Revenue Gang Master’s Licensing Authority and the Health and Safety Executive, collectively known as the Multi-Agency Targeted Enforcement Strategy (**MATES**). The MATES operations have identified accommodation that does not meet fire safety standards, a number of unlicensed HMOs, as well as highlighting vulnerable tenants that require our urgent support. Each partner organisation that is involved in MATES follows up the visits using their own legal powers as appropriate. Further covert operations are planned for 2020 although these are currently subject to Covid19 restrictions.
- 4.2.8 **Enforcement activity has included:**
- Issuing the first Banning Order in England. A Banning Order prevents a landlord or agent from working in the property industry for up to 5 years allowing the Council to take over management of the Landlord’s property. This has sent a strong message to other rogue landlords operating or who may be thinking of operating in our area.
 - Serving 425 enforcement notices to improve property conditions, the majority of which were complied with. Where landlords failed to comply, prosecutions followed.
 - Issuing 2 Rent Repayment Orders, totalling of over £3k. A Rent Repayment Order requires a landlord who has committed certain offences to repay rent or housing-related benefits.
 - Issuing 7 civil penalties for Housing Act offences, totalling £36k. Civil penalties are an alternative to prosecution, which can be a time-consuming process.
- 4.2.9 We have particularly targeted our resources on bringing Houses in Multiple Occupation (HMOs) up to standard. When the mandatory HMO licensing requirements changed in October 2018, we had an initial surge in applications and there were 148 applications pending this time last year. We have now issued licenses for 258 HMOs. We have also progressed 2 prosecutions in order to address poor management of HMOs.
- 4.2.10 Another area we have prioritised is the enforcement of trading standards legislation to ensure that letting agents operating in Telford & Wrekin are legally compliant. This approach is highly innovative and has seen some very positive results, including educating letting agents that they need to:
- Be a member of a Government approved property redress scheme – initially only 70% were members of a scheme, now only one letting agent is non-compliant with enforcement action in progress.
 - Provide tenants with an Energy Performance Certificate (EPC) at the start of their tenancy and ensure that no property below an E-rating is rented – 8 penalty notices have been issued with a number more in progress.
 - Make any fees for tenants and landlords clear in store and on their Website – there are 2 ongoing investigations which will be reported on in 2020/21.
 - Use assured short-hold assured tenancy agreements and not licences, as the latter does not give adequate protection to tenants – there are 2 ongoing investigations into the use of ‘sham’ licences.

5. Making best use and improving the quality of all existing homes

Improving energy efficiency

- 5.1.1 According to BEIS (Department for Business, Energy and Business Strategy), in 2016 there were 2.53 million households in England who were in fuel poverty, which is 10.9% of all English households. In Telford & Wrekin, we estimate around 7,700 households in fuel poverty which is above the national average at 11.5%.
- 5.1.2 The Council continues to work in partnership with Agility Eco and Marches Energy Agency to provide the following services to reduce fuel poverty for residents of Telford & Wrekin:
- **LEAP** is a free energy advice service. Advisors visit eligible residents and can implement free simple energy saving measures, such as LED light bulbs and draught-proofing, to reduce energy bills. Residents are also referred to any other schemes that will benefit them, such as insulation and heating upgrades (through a scheme called ECO – see next steps below), replacement of old and inefficient appliances and emergency central heating repairs. Training to over 30 staff from the Council and partner organisations, such as Wrekin Housing Trust, Carers Contact centre and Community Centres has been delivered to ensure all organisations can support clients to be referred into the LEAP scheme. Residents can also refer themselves via a Freephone number or the LEAP website (<https://applyforleap.org.uk/>).
 - **Switch Telford** – the Council's energy price comparison and switching Website (<https://telford.makeitcheaper.com/compare> or via a Freephone helpline). Since Switch Telford was launched in April 2017, there have been 1,755 switches and between January-June 2019 at least 10% of people switching saved £447 or more.
 - **Connected for Warmth** (first time central heating) – the Council supported Agility Eco's successful bid to the Warm Homes Fund in December 2019 to enable residents of Telford & Wrekin who have never had central heating installed in their home and have expensive and inefficient heating systems, such as storage heaters or open fires, to obtain free connections to the gas grid and first time central heating. Further information is available at www.connectedforwarmth.org.uk or via a Freephone helpline.

Recommended Next steps:

5.1.3 The following next steps are recommended to improve energy efficiency of our housing stock across all tenures:

- **Publish a Statement of Intent** - one of the main ways that the Government seeks to reduce fuel poverty and improve the energy efficiency of domestic properties is via the Energy Company Obligation (ECO) scheme. ECO is a legal requirement for major energy companies to provide funding for the installation of energy saving

measures (insulation and heating upgrades) in eligible households. This funding is in its third phase (ECO3) and runs until March 2022. As part of ECO3, local authorities are able to publish a Statement of Intent (SOI - also known as Local Authority Flex). The SOI is a public statement of the criteria set by the local authority to identify households eligible for measures provided under ECO3 funding. The rationale for publishing a SOI is that it will widen eligibility for funding and will enable more vulnerable households in Telford & Wrekin affected by fuel poverty to benefit from energy saving measures. The proposed SOI is set out in Appendix A of this report.

- **Develop a new fuel poverty Website** - to increase take-up of our existing offer by making it easier for residents to see what help is available for their tenure group. As an interim measure, we have improved our existing Council web-page to highlight the range of support available.

- **Develop a Fuel Poverty Strategy** – to include identifying and bidding for additional external funding to further reduce fuel poverty, working in partnership with other organisations. The strategy will be evidence-led and informed by the planning stock condition survey work set out in the Housing Strategy. The strategy will set out how we will also target those parts of the Borough with the highest levels of fuel poverty, such as South Telford, where improving the energy efficiency of homes will play a key part in our housing renewal plans. We will also prioritise improvements that have the greatest climate change impact, supporting the Council's aspiration for the Borough to be carbon neutral by 2030. The outcomes delivered will be reviewed after 12 months.

5.2 Bringing empty properties back into use

5.2.1 Based on Government data, there were 390 properties in Telford & Wrekin in October 2018 that had been empty for more than 2 years with Council Tax records in May 2020 showing over 700 that had been empty for more than 6 months. While lower than the unitary authority average of 1,515 empty for more than 2 years empty properties remain a concern in the Borough, as they can attract anti-social behaviour and crime, reduce property prices locally and be a blight on a neighbourhood. In order to encourage owners of long-term empty and unused properties to bring them back into use, we have charged a 50% Council Tax premium since 2013. This premium was increased in 2019/20 budget.

Recommended Next steps:

5.2.2 Specific revenue and capital funding has been allocated to ensure that we can deliver the commitment in the Council Programme to bring more empty properties back into use. We will prioritise those properties that have been empty for 2+ years, are in a poor or dangerous condition or are causing a significant adverse impact in their neighbourhoods. We will target those areas with the highest number of empty properties, using Council Tax data and local intelligence from ward members, Town & Parish Councils and local residents. We have already progressed this with the appointment in June of an Empty Property Officer. We will drive this initiative forward by:

- Enabling residents to report empty properties online and widely promoting this;

- Developing a robust Empty Property Strategy to make best use of all housing stock, and removing any detrimental impacts to our communities and neighbourhoods;
- Negotiating with owners to bring properties back into use and providing advice and support to facilitate this, such as the option to use the Council's in-house lettings agency, Telford HomeFinder, to find tenants and manage the property on the owner's behalf;
- Using a range of powers to develop a 'best course of action approach' for each empty property presenting, including enforcement action to:
 - Tackle environmental crime linked to empty properties, such as graffiti and fly-tipping;
 - Clean-up land that is affecting the amenity of an area;
 - Secure a property to prevent unauthorised access;
 - As a last resort, and if other options have been unsuccessful, acquire land and property – either purchasing, taking over the management or enforcing the sale of a property.

PREVIOUS MINUTES

15 February 2018 – Cabinet, Better Homes for All

14 March 2019 – Cabinet, Better Homes for All Update

Report prepared by Katherine Kynaston Director: Housing, Employment & Infrastructure Katherine.kynaston@telford.gov.uk :

Appendix A – Telford & Wrekin Statement of Intent

Telford & Wrekin Council
Eco Flexible Eligibility Statement of Intent
June 2020 -
Published at <http://www.telford.gov.uk>

1. Introduction

- 1.1 In accordance with the Department for Business, Energy and Industrial Strategy (BEIS) Guidelines, this Statement of Intent sets out how Telford & Wrekin Council will determine households' eligibility for ECO funding where those households do not fit into the Government criteria of 'low income' but are nevertheless felt to be vulnerable to the effects of cold.
- 1.2 There are around ¹ 7,700 householders in fuel poverty in the Borough -11.5%. Within this, certain communities are particularly affected. This includes the urban wards of Stirchley, Brookside, Madeley, and parts of Wellington, as well as rural areas around Telford where fuel poverty rates are much higher - 12-16%
- 1.3 This ECO flexible eligibility criteria will contribute to the priority in the Council Programme to improve the health and wellbeing of residents of Telford & Wrekin, particularly being mindful that 15 of the Borough's neighbourhoods are ranked amongst the 10% most deprived nationally for health.
- 1.4 The Council has recently declared a climate change emergency and recognises the contribution that addressing fuel poverty can make to our aspiration to become a carbon neutral borough by 2030. For example, installing a combi boiler could improve a home's energy efficiency from a Band G (the lowest band), to a Band D category and with further measures, such as roof or wall insulation, this could reach a Band C rating.
- 1.5 We have also made a clear commitment in our Council Plan for every family to have a safe, warm and affordable home. 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 health. Telford & Wrekin Council wishes to use Flexible Eligibility to its fullest to mitigate the effects of fuel poverty and improve the health and wellbeing of its residents.
- 1.6 The Council is currently helping to address fuel poverty in the following ways;
 - Switch Telford (switch.telford.gov.uk) - a price comparison service that encourages residents to save money on their energy bills (1,755 switches since launch in April 2017);
 - Referrals to LEAP (Local Energy Advice Partnership) run by Agility Eco, offering free home visits with low cost energy saving measures for eligible T&W residents;
 - Information on the Council Website signposting people to energy advice.

- 1.7 Inclusion in a Declaration made by the LA to a supplier will not guarantee installation of measures, as the final decision 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, and iii) whether suppliers have achieved their targets or require further measures to meet their ECO targets.

2. How the Council will identify eligible households

- 2.1 In accordance with the provisions of the ECO Order, eligible households must be either;
- (a) Living in fuel poverty i.e. low income, high cost or;
 - (b) Have a low income and are vulnerable to the cold
- 2.2 Telford & Wrekin Council will apply the following eligibility criteria to identify eligible households who may benefit from the installation of measures under ECO flexibility.
- 2.3 This Eco Flexibility criteria applies to private sector households, including owner occupiers and private tenants, in line with the Government guidance

(a) Criteria for identifying households in fuel poverty (low Income high cost)

Private sector households will be considered at risk of fuel poverty if they are determined to be a low income household and live in a high cost home, in relation to energy use.

Low income is defined by:

- Having a household income, after the payment of rent/mortgage, council tax, and utility bills of less than £22,200

This is based on the median after housing costs income for Middle-layer Super Output Areas in Telford & Wrekin.

High heating cost households are determined by:

- a) the property has an EPC (Energy Performance Certificate) of D, E, F or G or;
- b) if the property doesn't have an EPC, then having a score of 50 points or more from answering the following questions;

Question	Response	Score
How many rooms are there in the home?	1	0
	2	10
	3	30
	4	40
	5	50
	6 or more	60
Are energy payments made by direct debit?	Yes	0
	No	15
What type of property is it?	Flat	0
	Terraced	20
	Semi-detached	30
	Detached	30
	Park Home/permanent caravan	60

What is the tenure?	Owner occupied	0
	Registered Social Landlord	0
	Private rented	15
Does the home use a boiler?	Yes	0
	No	5
Was the home built before 1976?	No	0
	Yes	25
What is the main fuel type used in the home?	Gas	0
	Other	15
	Electricity	30

(b) Criteria for identifying low income and vulnerability to cold (LIVC)

Private sector households will be considered vulnerable to the effects of living in a cold home if they are determined to be a low income household AND meet one the vulnerable to cold criteria below.

Low income is defined by:

Having a household income, after the payment of rent/mortgage, council tax, and utility bills of less than £22,200

Vulnerability to cold is defined by:

A household will qualify as being vulnerable to the effects of a cold home where one or more occupant;

- is aged over 60;
- is pregnant;
- is responsible for a child under the age of 18 living in the household;
- has a disability;
- is on the Energy Companies Priority Services Register;
- has a limiting long term or terminal illness affected by cold;
- respiratory conditions e.g. COPD, childhood asthma, severe asthma, emphysema, chronic bronchitis
- cardiovascular conditions e.g. coronary heart disease, high blood pressure, heart attack, poor circulation, stroke or mini strokes (TIA)
- diabetes
- musculoskeletal conditions e.g. arthritis (requiring regular review), chronic fibromyalgia
- neurological conditions e.g. dementia, Parkinson's Disease, Multiple Sclerosis
- mental health conditions e.g. depression, schizophrenia, bipolar disorder
- restricted mobility
- terminally ill
- suppressed immune system (e.g. from cancer treatment or HIV)

In exceptional cases, where an applicant does not meet the requirements under either a) or b), consideration will be made on a case by case basis.

3. Acting on behalf of another local authority

Telford & Wrekin Council is not acting on behalf of any other local authority.

4. Joint statement of intent

Telford & Wrekin Council are not working with any other local authority in regard to this Statement of Intent.

5. Governance

Once a household who has applied for help through a contractor and their eligibility has been confirmed, their information will be passed to the Local Authority to make a Declaration.

Qualifying residents will be asked to sign consent for their information to be sent to the Council, agree to the terms and conditions of the application and declare that the information they have provided is correct. They must accept that any applications later found to be invalid, based on information they provided, must be re-paid.

Applicants will be made aware that any agreement they sign is between them and the installer, not with Telford & Wrekin Council.

Declarations that a household meets Telford & Wrekin Council's Flexible Eligibility criteria will be signed by Home Improvement Case Workers on behalf of the local authority. The declaration will then be sent to the appointed contractor for progressing.

6. Referrals

- 6.1 The Council's Marketing & Communications Team has developed a Marketing Plan to promote the availability of Eco funding to its residents and encourage referrals. The Plan includes;
- regular press releases;
 - internal communications to all staff;
 - managers' briefings;
 - pop up banners on intranet;
 - flyers to community team for events and community centres;
 - flyers at libraries, Contact Points, Registered Social Landlords, GP surgeries;
 - Facebook and Twitter;
 - Customer call hold message;
 - Council webpage;
 - Gov Delivery subscriber groups – Housing Benefit, News For You, Council Tax;
 - Radio Shropshire coverage – launch of new service ;
 - Article in Your Voice (distributed to over 76,000 subscribers);
 - Communication via Town & Parish Councils.
- 6.2 To target our marketing towards those households vulnerable to the effects of cold, on a low income, in high energy cost properties, the Council will;
- Work closely with Public Health to identify routes to vulnerable households;
 - Brief frontline Council staff and other partners to encourage referrals from their respective clients, including staff in Marches Energy Agency, Housing and Environmental Health, Health & Social Care, Age UK, Shropshire Fire & Rescue Service, Citizen's Advice;
 - Send mailshots to homes where our data on income, property and health suggests that households may be eligible.
- 6.3 The Council works with partners and other schemes who will be able to identify and refer eligible households, such as; Marches Energy Advice, LEAP Referrers.
- 6.4 Potentially eligible households can apply themselves through;

- My EcoHome portal - for insulation and heating measures;
- Connected for Warmth website - for first time central heating and gas connection.

7. Evidence, monitoring and reporting

7.1 All evidence, monitoring and reporting will be undertaken through contract management procedures which will be put in place with installers. This will include;

- data collection and the mechanisms for monitoring the effective targeting of relevant households;
- monitoring which households of those targeted have subsequently receive a measure;
- the method and frequency with which information is reported to those with governance and decision-making responsibilities;
- auditing of data collection and the monitoring mechanism and
- the use of controls to deter, prevent and detect fraud.

8) Signature

Signed:

Position: Director – Housing, Employment & Infrastructure, Telford & Wrekin Council

Date: