Statement of Intent for ECO4 and Great British Insulation Scheme

East Devon District Council ECO4 and Great British Insulation Scheme Flexible

**Eligibility Statement of Intent** 

**Local Authority name: East Devon District Council** 

Publication Date: 13/03/2024

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This statement sets out **East Devon District Council's** flexible eligibility criteria for the Energy

Company Obligation (ECO4) and Great British Insulation schemes which run until March 2026.

The ECO4 scheme will focus on supporting low income and vulnerable households. The scheme

will improve the least energy efficient homes helping to meet the Government's fuel poverty

and net zero commitments. The Great British Insulation Scheme will support the ECO4 scheme

in the delivery of predominantly single measures targeted at a wider range of households.

The flexible approach for Local Authorities (LAs) to identifying fuel poor and vulnerable

households who may benefit from heating and energy saving measures is referred to as "ECO4

Flex" and "Great British Insulation Scheme Flex".

The Council is publishing this Statement of Intent (SoI), on the 13/03/2024 to confirm that

each of the households declared will adhere to at least one of the four available routes outlined

below. The tick boxes can be used to indicate to households which routes the council is using:

☑ Route 1: Owner-occupied and private rented sector households with a gross annual income

less than £31,000. This cap applies irrespective of the property size, composition, or region.

Route 2: Owner-occupied and private rented sector households that meet a combination of

two of the following proxies:

V1.0

**Proxy 1)** Homes in England in Lower-layer Super Output Area 1-3 (LSOA)<sup>1</sup>, or homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019<sup>2</sup>, or homes in Scotland in "data zone" 1-3 on the Scottish Index of Multiple Deprivation 2020<sup>3</sup>\*

**Proxy 2)** A person living at the premises is entitled to a Council Tax reduction on the grounds of low-income.

**Proxy 3)** A person living at the premises is considered to be vulnerable to the cold under the National Institute for Health and Care Excellence (NICE) Guidance NG6: Recommendation 2, for a reason other than their low-income<sup>4</sup>\*

**Proxy 4)** A child living at the premises is eligible for free school meals, due to low-income<sup>5</sup>

Proxy 5) Not applicable

**Proxy 6)** A household referred to the LA for support by their energy supplier or Citizens Advice or Citizens Advice Scotland, because they have been identified as struggling to pay their electricity and/or gas bills.

Proxy 7) [Please note, proxy 7 is for supplier owned debt data and is listed here for information only]. Households identified through energy supplier debt data. This route enables obligated suppliers to use their own debt data to identify either non pre-payment meter households (non-PPM), or pre-payment meter households (PPM)\*.

- a. **Non-PPM customers:** These are customers who have been in debt for more than 13 weeks ending with the day on which the declaration is made, and are in a debt repayment plan with their energy supplier or repaying their fuel debt through 3<sup>rd</sup> party deductions.
- b. **PPM customers:** Suppliers may also identify PPM households who:
  - have either self-disconnected or received supplier Discretionary/Friendly credit within the last 13 weeks ending with the day on which the declaration is made; or
  - are in a debt repayment plan with their energy supplier; or
  - repaying their fuel debt through 3<sup>rd</sup> party deductions.\*

<sup>&</sup>lt;sup>1</sup> Published at https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019. The deciles are published in "File 7: all ranks, deciles and scores for the indices of deprivation, and population denominators". 
<sup>2</sup> Published at https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Welsh-Index-of-Multiple-Deprivation/WIMD-2019

<sup>3 2020</sup>v2. Published at http://www.gov.scot/publications/scottish-index-of-multiple-deprivation-2020v2-ranks 4 https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations#recommendation-2-ensure-there-is-a-singlepointofcontact-health-and-housing-referral-service-for

<sup>&</sup>lt;sup>5</sup> Under section 512ZB(4) of the Education Act 1996 or section 53 of the Education (Scotland) Act 1980

- \* Note proxies 1 and 3 cannot be used together.
- \* Proxy 7 cannot be used in combination with proxy 5 or proxy 6.

■ **Route 3:** Owner-occupied and private rented sector households that have been identified by either a person registered in the General Practitioner Register, a Scottish Health Board, a Welsh Health Board, an NHS Foundation Trust, or an NHS Trust as vulnerable, with an occupant whose health conditions may be adversely affected by living in a cold home. These health conditions must be cardiovascular, respiratory, immunosuppressed, or limited mobility related.

Route 4 [applicable to ECO4 Flex only]: Owner-occupied and private rented sector households that are referred under Route 4: Bespoke Targeting. Suppliers and LAs can submit an application to the Department for Energy Security and Net Zero where they have identified new methods to identify low-income and vulnerable households. Applications need to demonstrate a number of factors, including that the proposed methodology is more effective at identify households in fuel poverty than the criterion offered under Routes 1 and 2.

## Scheme eligibility

All potentially eligible households should apply through East Devon District Council or one of their approved ECO / Great British Insulation Scheme installers, if a list of approved installers is available, to see if they can either benefit from the scheme or be assessed for eligibility under any other relevant programme.

## **Declaration and evidence check confirmation**

It should be noted that the final decision on whether any individual household will benefit from energy saving improvements or heating 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. The final decision will depend on;

- i) identification of measures eligible under Help to Heat
- ii) the supplier's assessment of the cost-effectiveness of installing measures in relation to achieving its obligation
- iii) whether the supplier has achieved their targets or require further measures to meet their Energy Company Obligation targets.

East Devon District Council expects that energy suppliers or agents of energy suppliers involved in flexible eligibility surveys and works identified will comply with the Data Protection Act in accordance with Ofgem requirements, will act in accordance with industry best practice

Guidance – ECO4 Flex Statement of Intent template

in relation to consumer care and quality standards and will comply fully with the requirements

set out in The Electricity and Gas (Energy Company Obligation) Order 2018.

Companies and individuals must not falsely represent their association with the Council and

must not use the East Devon District Council logo on paperwork unless formally agreed.

At initial engagement with prospective clients, representatives must confirm who they are,

which company they are working for, and whether that company has been subcontracted by

another company or will be selling on householder details.

The administration charge levied by East Devon District Council in providing the declaration

necessary for clients to access the ECO Flexible Eligibility Scheme is £100 + VAT. This charge must be paid by the energy supplier or their agent and may not under any circumstances, be

passed on to the client receiving assistance via the scheme. Billing will be monthly.

Failure to pay a monthly bill may lead to declarations associated with the Energy Company

being refused. The Council reserves the right to waiver administration costs where it is

working in partnership with an Energy Company or its representatives.

An LA officer (not a 3<sup>rd</sup> party working on behalf of an LA) will be responsible for checking, and

verifying evidence, and issuing declarations. For any general enquiries relating to this SoI

please contact:

Name: Martin Prew

Job Title: Private Sector Housing Technical Officer

**Telephone:** 01395 571572

Email: pshousing@eastdevon.gov.uk

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CEO or dedicated responsible person mandatory signature.

East Devon District Council will administer the ECO4 Flex scheme according to the Electricity

and Gas (Energy Company Obligation) Order 2022 (ECO4 Order).

The Council will administer Great British Insulation Scheme Flex according to the Electricity and

Gas (Energy Company Obligation) Order 2023 (ECO4A Order).

The dedicated responsible person of the Council will oversee the process of identifying eligible

households under ECO Flex and Great British Insulation Scheme Flex. The Council will notify

Ofgem of households that declarations have been issued for via the declaration notification

template.

All personal data collected or processed by East Devon District Council for the purposes of ECO4

Flex or Great British Insulation Scheme Flex will be processed and stored in accordance with:

the Council's obligations under UK GDPR and the Data Protection Act 2018, the Council's data

protection policy, the Information Commissioner's Office Data Sharing Code and other

guidance, and Department for Energy Security and Net Zero guidance.

Signature:

Name: Matthew Blythe

Job Title: Assistant Director – Environmental Health

Date of signature: 06 March 2024

For any general enquires relating to this SoI please contact pshousing@eastdevon.gov.uk