



# Statement of Intent for ECO4 and Great British Insulation Scheme

## Exeter Council ECO4 and Great British Insulation Scheme Flexible Eligibility Statement of Intent

**Local Authority name: Exeter City Council**

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This statement sets out Exeter City 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 welcomes the introduction of the ECO4 Flex and Great British Insulation Scheme Flex eligibility routes as it helps the Council achieve its plans to improve the homes of those in fuel poverty or vulnerable to the cold.

The Council is publishing this Statement of Intent (SoI), on the 07/08/2023 to confirm that each of the households declared will adhere to at least one of the four available routes outlined below. The tick boxes indicate 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 and is from all sources of income, including both non means tested and means tested benefits.

**Route 2:** Owner-occupied and private rented sector households that meet a combination of two of the following proxies:

**Proxy 1)** Homes in England in Lower-layer Super Output Area 1-3 (LSOA)<sup>1</sup>

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

**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>2\*</sup>

**Proxy 4)** A child living at the premises is eligible for free school meals, due to low-income<sup>3</sup>

**Proxy 5)** Not applicable

**Proxy 6)** A household referred to the LA for support by their energy supplier or Citizens Advice 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.\*

\* Note proxies 1 and 3 cannot be used together.

\* Proxy 7 cannot be used in combination with proxy 5 or proxy 6.

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<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> <https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations#recommendation-2-ensure-there-is-a-singlepointofcontact-health-and-housing-referral-service-for>

<sup>3</sup> Under section 512ZB(4) of the Education Act 1996 or section 53 of the Education (Scotland) Act 1980

**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.

This is because the Council has identified a positive correlation between households who suffer from long-term health conditions and living off a low-income, with living in poorly insulated homes.

**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 Exeter City 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.

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.

Exeter City 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 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 Exeter City 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 Exeter City 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.

The LA officer below will be responsible for checking, and verifying evidence, and issuing declarations. For any general enquiries relating to this SoI please contact:

**Name:** Claire Hope

**Job Title:** Private Sector Housing Officer

**Email:** financial.assistance@exeter.gov.uk

### **CEO or dedicated responsible person mandatory signature.**

Exeter City 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 CEO/ 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 Exeter City 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:** Simon Lane

**Job Title:** Service Lead – Environmental Health & Community Safety

**Date of signature:** 07/08/2023