Statement of Intent for ECO4 and Great British Insulation Scheme

Wiltshire Council Council ECO4 and Great British Insulation Scheme Flexible **Eligibility Statement of Intent** 

**Local Authority name: Wiltshire Council** 

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This statement sets out Wiltshire 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".

Across, Wiltshire it is estimated that up to 63% of properties have an EPC rating of D or below. Increasing SAP ratings to band C, through the installation of energy efficiency measures, fits with the council's aims of addressing fuel poverty and reducing carbon emissions.

## **Eligibility identification**

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 **22/09/2023** to confirm that each of the households declared will adhere to at least one of the four available routes outlined below. The tick boxes can be used to indicate to households which routes the council is using:

## [Please use the tick boxes to indicate which routes are being used by the LA / DA]

■ **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:

**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)** A person living at the premises is supported by a scheme established by the LA/DA that is named and described within their Statement of Intent and established to support people living on a low-income and considered vulnerable to the cold under NICE Guideline NG6.

\*\*Please note Proxy 5 is not in use currently\*\*

<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

**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;
  - are in a debt repayment plan with their energy supplier; or
  - repaying their fuel debt through 3<sup>rd</sup> party deductions.\*

■ **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.

<sup>\*</sup> Note proxies 1 and 3 cannot be used together.

<sup>\*</sup> Proxy 7 cannot be used in combination with proxy 5 or proxy 6.

Please note, inclusion of a household in Wiltshire Council Flexible Eligibility declaration does not guarantee a measure will be installed in that home by an energy supplier. This will depend on surveys, energy savings achieved by suggested measures, funding and other commercial considerations. Suppliers will carry out an assessment which may identify multiple measures that

are required.

Scheme eligibility

If you are an installer or managing agent and you wish to process ECO Flex declarations then you will need to contact the Centre for Sustainable Energy and sign their Code of Conduct (contact installers@cse.org.uk for more information). They will then process the applications in line with the guidance including contacting the household to check their eligibility and then preparing the declarations for sign-off. There is a charge for this process. The

information will be passed to their ECO supplier according to the ECO application process.

Householders who believe they may be eligible for ECO Flex should contact the Home Energy Team directly (0800 082 2234 or <a href="https://www.cse.org.uk/my-home/how-we-help-">https://www.cse.org.uk/my-home/how-we-help-</a> you/) The Home Energy Team provides impartial energy advice to residents of Wiltshire and will check ECO Flex eligibility in their initial conversation with the resident. They will also check that the resident is happy for their data to be stored and shared with a third party for the purposes of the scheme. The eligibility information will be recorded on a secure CRM. A referral will then be made to an obligated supplier or installer who has signed the Code of Conduct. 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: Emma Bronson

Job Title: Public Health Practitioner

**Telephone:** 0300 456 0100

**Email:** emma.bronson@wiltshire.gov.uk

CEO or dedicated responsible person mandatory signature.

Wiltshire 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 Wiltshire 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: Professor Kate Blackburn

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Job Title: Director of Public Health

Date of signature: 27/09/2023