

Statement of Intent for ECO4 and Great British Insulation Scheme

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

Local Authority name: Moray Council

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This statement sets out **Moray 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 **25th November 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:

[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)¹, or homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019², or homes in Scotland in “data zone” 1-3 on the Scottish Index of Multiple Deprivation 2020^{3*}

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^{4*}

Proxy 4) A child living at the premises is eligible for free school meals, due to low-income⁵

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.

Proxy 5 refers to the ‘The Scheme of Assistance’ In -Home Advice Service supported and delivered by Moray Council.

¹ 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”.

² Published at <https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Welsh-Index-of-Multiple-Deprivation/WIMD-2019>

³ 2020v2. 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>

⁵ Under section 512ZB(4) of the Education Act 1996 or section 53 of the Education (Scotland) Act 1980

The scheme has been set up by the LA to reduce the risk of death and ill health associated with living in a cold home. The aim is to help meet a range of public health and other goals.

These include:

- Reducing preventable excess winter death rates.
- Improving health and wellbeing among vulnerable groups.
- Reducing pressure on health and social care services.
- Reducing 'fuel poverty' and the risk of fuel debt or being disconnected from gas and electricity supplies (including self-disconnection).
- Improving the energy efficiency of homes.

A wide range of people are vulnerable to the cold. This is either because of: a medical condition, such as heart disease; a disability that, for instance, stops people moving around to keep warm, or makes them more likely to develop chest infections; or personal circumstances, such as being unable to afford to keep warm enough.

The term vulnerable refers to several groups including:

- people with cardiovascular conditions.
- people with respiratory conditions (in particular, chronic obstructive pulmonary disease and childhood asthma)
- people with mental health conditions
- people with disabilities
- older people (65 and older)
- households with young children (from new-born to school age)
- pregnant women
- people on a low income

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 3rd 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 3rd party deductions.*

* 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 to **Moray Council** via [Home Energy Scotland \(HES\)](#) / [SCARF](#) / Council /or one of the [approved ECO / Great British Insulation Scheme installers](#) to see if they can either benefit from the scheme or be assessed for eligibility under any other relevant programme.

Telephone advisors can answer questions about heating and insulating your home, saving money, and cutting costs. They can refer on to delivery partners where appropriate.

HES phone number: 0808 8082282

SCARF phone number: 01224 213 005

The final decision on whether any individual household can benefit from funding for energy saving improvements under ECO Flex will be made by the appropriate ECO supplier and their contractors/agents. Eligibility does not guarantee funding and the final decision of whether measures will be undertaken will depend upon:

- Surveys carried out by an ECO contractor/agent of properties and household circumstances and the installation costs calculated.
- The energy savings that can be achieved the property.
- Whether suppliers have achieved their relevant Affordable Warmth targets or require further measures to meet such targets.
- Where the assessment process identifies that a household are required to pay a proportion of the cost of potential measures themselves, this which would be the subject of agreement between the parties.

An LA officer (not a 3rd 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: Fiona Geddes

Job Title: Housing Strategy and Development Manager

Telephone: 0300 123 4566

Email: housingstrategy@moray.gov.uk

CEO or dedicated responsible person mandatory signature.

Moray 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 **Moray 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: *Fiona Geddes*

Name: Fiona Geddes

Job Title: Housing Strategy and Development Manager

Date of signature: 25/11/2024

For any general enquires relating to this SoI, please contact housingstrategy@moray.gov.uk