



## Statement of Intent for ECO4

### Moray Council ECO4 Flexible Eligibility Statement of Intent

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[http://www.moray.gov.uk/moray\\_standard/page\\_41080.html](http://www.moray.gov.uk/moray_standard/page_41080.html)

This statement sets out **Moray Council's** flexible eligibility criteria for the Energy Company Obligation (ECO4) scheme from April 2022 – 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 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".

The Council welcomes the introduction of the ECO4 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.

At present, Moray Council only allow works funded by ECO flex to be undertaken by contractors appointed directly to install energy efficiency measures as part of the Energy Efficient Scotland: Area Based Scheme programme (EES:ABS).

The Council is publishing this Statement of Intent (Sol), on the **21/02/2023** to confirm that each of the households declared will adhere to at least one of the four available routes outlined below:

**Route 1:** Owner occupier SAP bands D-G households with an income less than £31,000 and Social Housing or Private Rented SAP bands E-G

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

**Route 2:** SAP bands E-G households that meet a combination of two of the following proxies:

**Proxy 1** Homes in LSOA 1-3 on the Index of Multiple Deprivation for 2020, published by the Scottish Government<sup>1</sup>

**Proxy 2** Householders receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates).

**Proxy 3** Householders vulnerable to living in a cold home as identified in the National Institute for Health and Care Excellence (NICE) Guidance. Only one from the list can be used, excludes the proxy 'low income'.\*

**Proxy 4** A householder receiving free school meals due to low-income.

**Proxy 5** A householder supported by a LA run scheme, that has been named and described by the LA as supporting low income and vulnerable households for the purposes of NICE Guideline.

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

*\* Proxies 1 and 3 can't be used in combination with each other*

**Route 3:** SAP bands D-G households that have been identified by their doctor or GP as low-income and vulnerable, with an occupant whose health conditions may be impacted further by living in a cold home. These health conditions may be cardiovascular, respiratory, immunosuppressed, or limited mobility related.

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<sup>1</sup> [Scottish Index of Multiple Deprivation 2020 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-index-of-multiple-deprivation-2020/pages/1-introduction-to-the-index-of-multiple-deprivation-2020.aspx)

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:** SAP band D-G households that are referred under Route 4: Bespoke Targeting. Suppliers and LAs can submit an application to BEIS where they have identified a low income and vulnerable household, who are not already eligible under the existing routes.

### **Declaration and evidence check confirmation**

All potentially eligible households should apply through the **Moray Council** or one of their approved EES: ABS contractors to ensure that they can either benefit from the scheme or be assessed for eligibility under other relevant programmes.

Householders should apply for Flex declaration via an EES:ABS contractor

The officer below will be responsible for checking and verifying declarations and associated evidence submitted on behalf of the local authority:

**Name:** Fiona Geddes

**Job Title:** Housing Strategy and Development Manager

**Telephone:** 0300 123 4566

**Email:** [housingstrategy@moray.gov.uk](mailto:housingstrategy@moray.gov.uk)

The final decision on whether a household receives ECO measures is made by the energy suppliers and therefore inclusion in an ECO Flex Declaration does not guarantee installation of energy efficiency measures.

## **Governance**

The key governance consideration is confirming that households meet the eligibility criteria set out in this Statement of Intent prior to a Declaration being issued. Subject to the above consideration being satisfied, the Council will issue a Declaration under the Flexible Eligibility mechanism for that property. At present, Moray Council only allow works funded by ECO flex to be undertaken by contractors appointed directly to install energy efficiency measures as part of its EES: ABS projects.

## **Referrals**

Moray Council are reviewing ECO Flexible Eligibility mechanisms to fully understand and realise how ECO can be maximised in our region whilst ensuring the protection of consumers.

At present the council will only accept referrals from approved delivery partners. A completed template declaration, along with supporting evidence will be submitted to the council for assessment against the criteria set out within this statement of intent. If approved, a signed ECO Flex declaration would be produced for the property. It is the council's discretion when selecting potential ECO Flex partners and when determining whether ECO Flex can support a pre-existing programme.

## **Privacy Notice**

Ofgem is the administrator of the ECO scheme. They have publicly available published guidance which states that the funding ECO energy supplier of an installed energy efficiency measure must ensure that its processing of information complies with all applicable data protection laws. It is the responsibility of the energy supplier to ensure the person who lives at the premises where the ECO measure is delivered knows how and why their information will be processed, including who the information will be disclosed to and for what purpose. The General Data Protection Regulation (UK GDPR) requires anyone collecting personal data to give the data subject (ie in the case of ECO the occupant or the landlord) a Privacy Notice.

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

Moray Council will administer the scheme according to BEIS' ECO4 Order and will identify eligible households via Ofgem's application process. The CEO of the Council will oversee the process of identifying eligible households under ECO4 Flex.

The eligibility information will be stored securely in line with the Council's data protection policy, Information Commissioner's Office Data Sharing Code, and BEIS guidance.

**Signature:**



**Name:**

Fiona Geddes

**Job Title:**

Housing Strategy and Development Manager

**Date of signature:**

21/02/2023

For any general enquires relating to this Sol, please contact

[housingstrategy@moray.gov.uk](mailto:housingstrategy@moray.gov.uk)