

## Statement of Intent for ECO4

### Staffordshire Moorlands District Council ECO4 Flexible Eligibility Statement of Intent

**Local Authority name: Staffordshire Moorlands District Council**

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This statement sets out **XXXXXX** 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.

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

**Route 1:** SAP bands D-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:

<b>Proxy 1)</b> 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 the Index of Multiple Deprivation for 2020, published by the Scottish Government <sup>3</sup>
<b>Proxy 2)</b> Householders receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates).
<b>Proxy 3)</b> 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'.
<b>Proxy 4)</b> A householder receiving free school meals due to low-income.
<b>Proxy 5)</b> 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.
<b>Proxy 6)</b> 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.

\* Note proxies 1 and 5 cannot be used together.

**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.

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 exiting routes.

<sup>1</sup> [The English Indices of Deprivation 2019 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

<sup>2</sup> [Welsh Index of Multiple Deprivation \(full Index update with ranks\): 2019 | GOV.WALES](https://gov.wales)

<sup>3</sup> [Scottish Index of Multiple Deprivation 2020 - gov.scot \(www.gov.scot\)](https://www.gov.scot)

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## Declaration and evidence check confirmation

All potentially eligible households should apply through **XXXXXX** Council or one of their approved ECO installers to ensure that they can either benefit from the scheme or be assessed for eligibility under any other relevant programme.

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

**Name:** XXXX XXXX

**Job Title:** XXXXXXXXXXXXXXXXXXXX

**Telephone:** XXXXX XXXXX

**Email:** XXXXXX@XXXXX.gov.uk

### CEO or dedicated responsible person mandatory signature

The **XXXXXX** 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:** XXXXXX

**Name:** XXXX XXXX

**Job Title:** CEO/ dedicated responsible person

**Date of signature:** XX/XX/XXXX

For any general enquires relating to this SoI, please contact [XXXXXXX@XXXXX.gov.uk](mailto:XXXXXXX@XXXXX.gov.uk).

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## **Eligible Referral Routes**

<b>ECO4 Flex Routes</b>
<b>Route 1)</b> Household income: Households with a combined gross income under £31,000
<b>Route 2)</b> Proxy targeting: Combination of two proxies outlined in Table 6 below.
<b>Route 3)</b> NHS referrals: Households can be referred by either an NHS Trust, an NHS foundation trust, a general medical practitioner provider, a Health Board, or a Local Health Board where a person is suffering from a severe and / or long term health condition that falls under one of the four umbrella conditions; Cardiovascular, Respiratory, immunosuppressed, or limited mobility and could be severely impacted by living in a cold home.
<b>Route 4)</b> Bespoke targeting: Suppliers and LAs can submit an application to BEIS where they have identified low income and vulnerable households, who are not already eligible under the exiting routes. Applications need to demonstrate that, aside from living in SAP band D, E, F and G: <ul style="list-style-type: none"><li>• The proposed methodology would identify low-income households where no more than 49% of which are not in the Help to Heat Group <b>and,</b></li><li>• Where at least 75% of the households that meet the criteria are in owner-occupied premises and contain at least one person living in fuel poverty or,</li><li>• At least 90% of the households that meet those criteria are in private rented premises that contain at least one person living in fuel poverty.</li></ul> Suppliers who refer households under Bespoke Targeting do not need to combine their application with debt data.

Route 2 Proxy Criteria
a) Homes in England in Lower Super Output Area (LSOA) 1-3 areas <sup>7</sup> or, b) Homes in Welsh provision Lower-layer Super Output Area in the first, second or third decile on the Welsh Index of Multiple Deprivation 2019 published in November 2019 by the Welsh Government <sup>8</sup> or, c) For premises located in Scotland, a data zone which is identified as being in the first, second or third decile on the Index of Multiple Deprivation for 2020 published by the Scottish Government <sup>9</sup>
Householders receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates)
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')
A householder supported by a LA run scheme, that has been named and described by the LA in their declaration as supporting low income and vulnerable households for the purposes of NICE Guidelines,
A householder receiving free school meals for low-income,
A household who has been referred to the local authority for support by their energy supplier or Citizens Advice because they have been identified by the referrer as struggling to pay their utility bills <b>(LAs only)</b>
Non Pre-Payment meter households will be eligible if in debt for more than 13 weeks <b>and</b> either in a debt repayment plan with their energy supplier or repaying their fuel debt through 3rd party deductions <b>(Suppliers only)</b>
Pre-Payment meter households, have to have been either self-disconnected or received supplier Discretionary / Friendly credit in the last 13 weeks; or in a debt repayment plan with their energy supplier; or repaying their fuel debt through 3rd party deductions <b>(Suppliers only)</b>

Please note, the combination of Proxies 1 and 3 cannot be used together.

### **Eligibility via Local Authority declaration:**

- LAs can use any of the routes and proxies detailed above, providing they have published a SoI on their website.
- The household that they have identified must be a private domestic premises for which the pre-project SAP band is D, E, F or G for owner-occupied homes, or SAP bands E, F or G for private rented sector households and properties receiving measures under Route 2.

### **Statement of Intent**

- SoIs will only be valid if it states an LA's intent to participate in ECO4 Flex and contains commitment that the signing LA officer has checked and verified that declarations will be issued for households which match the criteria for the SoI.
- From **1<sup>st</sup> July**, a new SoI will be required from LAs across GB to state their intent to participate in ECO4 Flex and a commitment that the signing LA officer will check and verify that declarations will be issued for households that match the criteria in the SoI. As with ECO3 SoIs, these would need to be signed by the CEO or dedicated responsible person.
- For ECO4, OFGEM propose that the SoI template is simplified to include the following information:
  - a) Name of the LA
  - b) LA they are acting on behalf of (if relevant)

- c) Date of publication
  - d) Version number
  - e) A statement to outline whether all or which of the four eligible routes outlined in the ECO4 Order the LA will use to identify households. The statement must also outline that a dedicated LA officer will check and verify declarations and associated evidence submitted.
  - f) A signature, (or co-signature) from the CEO or dedicated responsible person to confirm the above.
- This will be a standardised Sol template that the LA would publish on their website when they decide to participate in ECO4 Flex. OFGEM will publish a standard template separately alongside their ECO4 Flex Administration Guidance. This Sol will be published ahead of notifying declarations.

### **Notification of LA / DA declarations to Ofgem**

- OFGEM require LAs and Devolved Administrations (DAs), to submit declaration notifications in the form of a CSV file to Ofgem. Declarations will be on a per property basis so that, unlike ECO3, a declaration number is unique to one property.
- OFGEM propose that the declaration template includes the following fields:
  - 1) LA Declaration Unique Reference Number (URN),
  - 2) Referral made on behalf of another LA (optional),
  - 3) Referral Route:
    - Route 1, Low Income households,
    - Route 2, Proxy Targeting,
    - Route 3, NHS Referral or
    - Route 4, Bespokes Targeting (BEIS Panel).
  - 4) Route 2 or Route 3 proxies (only if relevant),
  - 5) Address details – street name/postcode,
  - 6) LA area (A local authority can provide declarations for households not within its administrative area . For example, this includes where a LA delegates some functions to another LA, where the LA providing the service is best placed to make a determination of the eligibility of a household. In such situations all relevant LAs must co-sign the Sol to confirm which LAs are operating on behalf of others. This must also be recorded on the LA declaration.)
  - 7) Date of householder eligibility,
  - 8) Statement of Intent publication date,
  - 9) Statement of Intent link.
- OFGEM expects both LAs and DAs to notify them of declarations ahead of the measure being delivered.
- Declarations must be issued no earlier than 12 months before the date on which the project started at the premises and no later than the date on which the project started.

### **Interim declaration process (submissions via email)**

- For the beginning of the ECO4 Flex scheme, Local Authorities and Devolved Administrations should provide Ofgem with their declaration notification via email: [ECO4Flex@ofgem.gov.uk](mailto:ECO4Flex@ofgem.gov.uk).