

## Statement of Intent for ECO4 and Great British Insulation Scheme

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

Local Authority name: Watford Borough Council

Publication Date: 6th October 2023

Version number: V.9a

Publication on web site: https://www.watford.gov.uk/SOI

This statement sets out **Watford Borough 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 eligibility routes as it helps them achieve 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 29<sup>th</sup> August 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:

**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. In Watford Borough Council, residents may be eligible under this Proxy if they have:

completed a Warm and Well Assessment carried out by the National Energy Foundation's (NEF) Better Housing Better Health (BHBH) helpline service. Residents referred by the Council to BHBH to receive free, independent home energy advice through a Warm and Well Assessment are referred on the basis of being low-income and at risk of or be in fuel poverty, and considered vulnerable to the cold under NICE Guideline NG6

**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.

<sup>3</sup> 2020v2. Published at http://www.gov.scot/publications/scottish-index-of-multiple-deprivation-2020v2-ranks <sup>4</sup> https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations#recommendation-2-ensure-there-is-asinglepointofcontact-health-and-housing-referral-service-for

<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>&</sup>lt;sup>5</sup> Under section 512ZB(4) of the Education Act 1996 or section 53 of the Education (Scotland) Act 1980

- 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.

**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 identifying households in fuel poverty than the criterion offered under Routes 1 and 2.

## Scheme eligibility

All potentially eligible households should apply through Better Housing Better Health on 0800 107 0044, 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.

Installer enquiries: Any supplier or installer who seeks a council declaration on behalf of an eligible resident will first need to be registered with the 'NEF Supplier Network'. The Network ensures that councils have information about the standards, practices and accreditations of installers working in their area reducing the risk of fraud, poor quality installations and the exploitation of vulnerable residents that the council is looking to assist via ECO Flexible

Eligibility. For further information about the Network and guidance on how to register, suppliers should contact <a href="mailto:suppliernetwork@nef.org.uk">suppliernetwork@nef.org.uk</a>

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 Sol please contact:

Name: Neil Walker	Job Title: Senior Project Manager, Energy
	& Housing Renewal
Telephone: 01923 278149	Email: Neil.Walker@Watford.gov.uk

## CEO or dedicated responsible person mandatory signature.

Watford Borough Council will administer the ECO4 Flex scheme according to the Electricity and Gas (Energy Company Obligation) Order 2022 (ECO4 Order).

Watford Borough 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 **Watford Borough 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.

Name	Alan Gough		
Job Title	Executive Head of Strategy & Initiatives (Sustainability & Culture)		
Date	6 <sup>th</sup> October 2023	Signature Alan GM	