

The Highland Council ECO4 Flexible Eligibility Statement of Intent

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Introduction

This statement sets out The Highland Council's flexible eligibility criteria for the Energy Company Obligation (ECO4) scheme from April 2022 – March 2026.

The ECO4 scheme focuses 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 Highland Council is committed to tackling fuel poverty which is prevalent across the Highlands due to the rural geography and lack of gas connection. The 2018 Scottish Housing Conditions Survey (2020) shows Highland fuel poverty levels to be at 32%, which is above the Scottish average of 25%. This commitment to tackling fuel poverty is set out in the Local Housing Strategy and the Highland Outcome Improvement Plan. Additionally, The Highland Council has declared a climate and ecological emergency, and the outcomes of ECO4 Flex and Energy Efficient Scotland will also positively impact on carbon emissions.

The Highland Council welcomes the introduction of the ECO4 Flex eligibility routes as it helps The Highland Council achieve its plans to improve the homes of those in fuel poverty or vulnerable to the cold.

Referral routes

The Highland Council is publishing this Statement of Intent (SoI), on the 19-Apr-2023 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 owner occupied households and SAP bands E-G private rented households with a gross annual 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 Scotland who are in "data zone" 1-3 on the Scottish Index of Multiple Deprivation (SIMD) for 2020, published by the Scottish Government ¹
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 ² . Only one from the list can be used, excludes the proxy 'low income'.
Proxy 4)	A householder receiving free school meals for a child, 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 Scotland, because they have been identified as struggling to pay their electricity and gas bills.
Proxy 7)	Households identified through 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).

* Note proxies 1 & 3 and 6 & 7 cannot be used in combination with each other.

Route 3: SAP bands D-G owner occupied or SAP bands E-G private rented 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.

¹ [Scottish Index of Multiple Deprivation 2020 - gov.scot \(www.gov.scot\)](http://www.gov.scot)

² [Overview | Excess winter deaths and illness and the health risks associated with cold homes | Guidance | NICE](#)

This is because The Highland 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 bands D-G owner-occupied households and SAP bands E-G private rented households that are referred under Route 4: Bespoke Targeting. Suppliers and LAs can submit an application to ESNZ (Department for Energy Security and Net Zero (previously known as (BEIS) Department for Business, Energy and Industrial Strategy) where they have identified a low income and vulnerable household, who are not already eligible under the exiting routes.

Currently Route 4 is not available in the Highlands. The Highland Council reserve the right to implement this route and update the SoI accordingly.

Compliance

It is the responsibility of the ECO installer(s) to collect all necessary evidence from applicants / households to allow applications to be verified as meeting the eligibility criteria as set out in this Statement of Intent.

All evidence requirements, as set by Ofgem, will be accepted on face value as being accurate. All risks and liabilities reside with the ECO Installer to ensure documentation submitted is accurate and true.

ECO Installers will be responsible for ensuring informed consent is sought from applicants / households to allow evidence to be shared with The Highland Council, in accordance with the Data Protection Act 2018.

ECO Installers will liaise with The Highland Council and energy suppliers in relation to eligibility and measures proposed for install.

ECO Installers will cooperate fully with The Highland Council for all audit or investigation requirements, providing access to allow relevant documentation to ensure regulatory compliance.

All data / evidence relating to ECO4 Flex will be held for 3 years post completion of ECO4 in March 2026.



The Highland Council will decide on which eligibility routes it is prepared to use at any one time. Declarations will only be made for projects instigated by The Highland Council or where The Highland Council has selected installers to participate in its ECO4 Flex scheme.

The Highland Council is not liable for the work ECO Installers carry out and do not guarantee the work of these ECO Installers. All contracts are entered between the homeowner and the ECO Installer.

Declaration and evidence check confirmation

All potentially eligible households should apply through Home Energy Scotland, The Highland Council or one of the approved ECO Installers (published online) to ensure they can either benefit from the scheme or be assessed for eligibility under any other relevant programme.

The final decision on whether individual households can benefit from energy efficiency improvements funded under the ECO4 Flex scheme will be determined by the appropriate ECO supplier and their appointed ECO Installers / agents. Eligibility alone does not guarantee funding.

The Project Manager and Contract Administrator will be responsible for checking and verifying declarations and associated evidence submitted on behalf of The Highland Council

All requests should be emailed to ECOflex.Highlands@highland.gov.uk.

The Highland Council requires all evidence to be provided along with necessary consent for information sharing to be provided by the ECO Installer ahead of any applications being considered.

Approved ECO Installers will be issued guidance notes by The Highland Council to support the collation of required evidence and documentation required to allow applications to be issued. Failure to comply will result in a temporary ban of the ECO Installer while The Highland Council undertakes a full review to determine eligibility to deliver the scheme in Highland.



CEO or dedicated responsible person mandatory signature

The Highland Council will administer the scheme according to BEIS ECO4 Order and will identify eligible households via Ofgem's application process. The Climate Change & Energy Manager will oversee the process of identifying eligible households under ECO4 Flex.

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

Authorised by:

Name: Neil Osborne

Job Title: Climate Change & Energy Manager

Date signed: 18/04/2023

For any general enquires relating to this SoI, please contact ECOflex.Highlands@highland.gov.uk.

