

The Highland Council ECO4 and Great British Insulation Scheme 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) and Great British Insulation schemes which runs until 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 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 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, Great British Insulation Scheme Flex and Energy Efficient Scotland will also positively impact on carbon emissions.

The Highland Council welcomes the introduction of the ECO4 Flex and Great British Insulation Scheme 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 25-Nov-2025 to confirm that each of the households declared will adhere to at least one of the four available routes outlined below.

The tick boxes indicate to households which routes The Highland 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) ¹ , or homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019 ² , 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-income ⁵
Proxy 5	A person living at the premises is supported by a scheme established by the LA 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.

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

	<p>In Highland, this will apply to households who are eligible for the schemes below:</p> <ul style="list-style-type: none"> • Supporting those vulnerable to the cold This scheme is to reduce the risk of death and ill health associated with living in a cold home • Supporting Extreme Fuel Poor Households This scheme is to provide support for households living in fuel-poor areas and offers support to people living on a low-income, considered vulnerable to the cold and living in extreme fuel poverty • Alignment with place-based energy efficiency projects This scheme is for properties located within a designated area of an active energy efficiency project <p>See Appendix 1.</p>
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	<p>Please note, proxy 7 is for supplier owned debt data and is listed here for information only.</p> <p>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)*.</p> <ol style="list-style-type: none"> 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. 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.*

Currently Proxy 7 not available in the Highland. The Highland Council reserve the right to implement this route and update the SoI accordingly

* 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.

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

Compliance

It is the responsibility of the 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 installer to ensure documentation submitted is accurate and true.

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.

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

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 and Great British Insulation Scheme Flex will be held for 3 years post completion, 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 and Great British Insulation Scheme Flex scheme.

The Highland Council is not liable for the work ECO4 flex or Great British Insulation Scheme Flex Installers carry out and do not guarantee the work of these Installers. All contracts are entered between the homeowner and the Installer.

The Highland Council will take appropriate action to deal with any installers **falsely** claiming to be working with The Highland Council or **falsely claiming to be present** on The Highland Council's approved installers list.

Declaration and evidence check confirmation

All potentially eligible households should apply through Home Energy Scotland, The Highland Council or one of the approved ECO Flex/ Great British Insulation Scheme Flex 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 and Great British Insulation Scheme Flex scheme will be determined by the appropriate ECO supplier and their appointed Installers / agents. Eligibility alone does not guarantee funding.

The Programme Manager, Contracts Officer, Project Manager and Project Officer will be responsible for checking, verifying evidence and issuing declarations 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 Installer ahead of any applications being considered.

Approved 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 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 ECO4 Flex scheme according to the Electricity and Gas (Energy Obligation) Order 2022 (ECO4 Order).

The Highland Council will administer Great British Insulation Scheme Flex according to the Electricity and Gas (Energy Company Obligation) Order 2023 (ECO4A Order).

The Highland Council 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 and Great British Insulation Scheme Flex. The Highland

Council will notify Ofgem of households that declarations have been issued for via the declaration notification template.

All personal data collected or processed by The Highland Council for the purposes of ECO4 Flex or Great British Insulation Scheme Flex will be processed and stored in accordance with: The Highland Council's obligations under UK GDPR and the Data Protection Act 2018, The Highland 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.

Authorised by:

Name: Neil Osborne

Job Title: Climate Change & Energy Manager

Date signed: 25th November 2025

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

Appendix 1

The Highland Council published the 'Local Housing Strategy 2023-2028' and 'Our Future Highland' policy which outlines the Council's ambition to improve energy efficiency of domestic homes and tackle fuel poverty across the region.

The Council has a number of recognised schemes, which align with Council policies and strategies (links below), to support Highland residents to access support to improve the efficiency of their home and reduce fuel poverty rates.

- [Energy Efficient Scotland: Area Based Scheme](#)
- [Fuel Poverty Strategy](#)
- [Heat in Buildings Strategy](#)
- [Local Heat and Energy Efficiency Strategy](#)
- [Local Housing Strategy](#)
- [NICE Guideline NG6](#)
- [SSE Renewables grant](#)
- [Our Future Highland](#)

Scheme: Supporting those vulnerable to the cold

Location: Highland wide

A person living in a property is supported by this scheme when they are considered vulnerable to the cold under NICE Guideline NG6.

The scheme has been set up by the Council 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 energy supply (including self-disconnection).
- Improving the energy efficiency of homes.

A wide range of people are vulnerable to the cold, outlined below, or face 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

The Highland Council is satisfied properties can be considered vulnerable to the cold under NICE guideline NG6, if they meet the above criteria.

Scheme: Supporting Extreme Fuel Poor Households
Location: Highland wide

This scheme has been established by Highland Council to provide support to households living in fuel-poor areas and offers support to people living on a low-income, considered vulnerable to the cold and living in extreme fuel poverty. Aligning with Council policy, as set out in [Our Future Highland](#), the scheme aims to provide homes which are warmer and more energy efficient and to improve the quality and condition of domestic properties in Highland and to support our communities to make a positive difference to the lives of people and to support Highland residents to live well and independently.

Highland Council is satisfied properties can be low income and vulnerable to the cold under NICE guideline NG6, if they meet one of the three criteria detailed below.

Criteria 1: Someone living at the property is on a state benefit listed below:

Benefit	
Income based Jobseekers allowance (JSA)	Attendance Allowance
Income based Employment & Support Allowance (ESA)	Carer's Allowance
Income based Income Support (IS)	Housing Benefit
Disability Living Allowance (DLA)	Pension Guarantee Credit
Personal Independence Payment (PIP)	Working Tax Credit (WTC)
Industrial Injuries Disablement Benefit	Child Tax Credits (CTC)
War Pensions Mobility Supplement	Universal Credit (UC)
Council Tax Reduction (excluding 25% discount for single occupancy)	Support for Mortgage Interest

Criteria 2: Fuel costs are 20% or higher than net income after living costs

Number of people in the household	Household net income (after housing costs) per year	Household net income (after housing costs) per week
1 adult	£10,695	£206
1 adult and 1 child	£14,030	£270
1 adult and 2 children	£17,250	£332
1 adult and 3 children	£20,700	£399
1 adult and 4 or more children	£24,150	£465
2 adults	£17,480	£337
2 adults and 1 child	£20,930	£403
2 adults and 2 children	£24,265	£467
2 adults and 3 children	£27,715	£533
2 adults and 4 or more children	£30,820	£593

Criteria 3: Household is entitled to:

- Cold Weather Payment
- Child Winter Heating Assistance
- Warm Home Discount scheme

Scheme: Alignment with place-based energy efficiency projects

Location: Highland wide

The scheme has been established by Highland Council to orchestrate the delivery of place-based projects and ensuring a just transition for all.

Scottish Government's Energy Efficient Scotland: Area Based Scheme (EES:ABS) contribute to delivering wider aims as set out in the [Heat in Buildings Strategy](#) and [Fuel Poverty Strategy](#). To ensure:

- Fewer Scottish households experience fuel poverty and extreme fuel poverty
- Energy inefficiency is reduced
- More Scottish homes are warm and comfortable
- Long term reductions in CO2 emissions and decarbonisation of heat
- More fuel poor households benefit from a 'whole house' retrofit, including the provision of zero/low carbon heating measures and microgeneration
- The maximisation of other funding, including Energy Company Obligation (ECO), and other investment to maximise the impact of projects

Households will be deemed eligible for this scheme if their property is located in a designated area of an active energy efficiency project, developed in line with the principles outlined in the [Local Heat and Energy Efficiency Strategy](#).

Properties must meet the criteria, as set out by the Scottish Government, for the Energy Efficiency Scotland: Area Based Scheme (EES:ABS).

Highland Council is satisfied properties can be considered vulnerable to the cold under NICE guideline NG6, for the below reasons:

- SAP rating below 68 or EPC band D-G
- Property is not and cannot be connected to mains gas
- Property has inefficient or inadequate heating
- The home is poorly ventilated
- Property is uninsulated or the insulation requires upgrading
- Current energy efficiency project in the area