

Statement of Intent for ECO4

Midlothian Council ECO4 Flexible Eligibility Statement of Intent

Local Authority name: Midlothian Council

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This statement sets out Midlothian 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 Scottish Government's Energy Efficient Scotland (EES) Programme is a key mechanism for delivering energy efficiency improvements to the homes of fuel poor households in Midlothian. ECO Flex declarations will be made to support households connected to current EES programmes delivered through the council's appointed managing agents and contractors. When eligible, ECO Flex funding will be considered to complement EES programmes and to assist the delivery of mixed tenure projects to the homes of households at risk of fuel poverty.

The council is publishing this Statement of Intent (SoI), on the 18 May 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 private rented sector 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 for owner-occupied households and private rented sector households that meet a combination of two of the following proxies:

Proxy 1) Homes in 1-3 on the Index of Multiple Deprivation for 2020, published by the Scottish Government¹

Proxy 2) Householders receiving a Council Tax reduction (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 owner-occupied households and private rented sector E-G 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 impacted further by living in a cold home. These health conditions may be cardiovascular, respiratory, immunosuppressed, or limited mobility related.

Route 4: SAP band D-G owner-occupied households and private rented sector E-G households that are referred under Route 4: Bespoke Targeting. Suppliers and LAs can submit an application to ESNZ where they have identified a low income and vulnerable household, who are not already eligible under the exiting routes.

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

Declaration and evidence check confirmation

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

The Council will only accept requests for a Declaration from an organisation with which it has a prior relationship, including a Confidentiality Agreement or Data Sharing Agreement, to ensure data protection requirements are respected.

Prior to any property being included in a Declaration, the Council will require details for the eligibility criteria that the household meets along with evidence that the Council deems adequate and meets Ofgem guidance requirements.

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

Name: Alan Ramage

Job Title: Planned Maintenance Manager

Telephone: 0131 561 5275

Email: alan.ramage@midlothian.gov.uk

IMPORTANT NOTE: Inclusion in a Declaration of Eligibility issued by the Council does not guarantee installation of measures. The final decision on whether any individual household will receive an offer of funded energy efficiency measures rests with obligated energy suppliers or their contractors. The final decision will depend on identification of eligible measures, the supplier or contractor's assessment of the cost-effectiveness of installing measures and whether the obligated energy suppliers have achieved their Help to Heat targets.

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. The Council will therefore require satisfactory evidence being provided prior to any Declaration being produced.

At present, the 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

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

The Midlothian Council will administer the scheme according to the Electricity and Gas (Energy Company Obligation) Order 2022 (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 ECO 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 ESNZ guidance.

Signature: Alan Ramage

Name: Alan Ramage

Job Title: Planned Maintenance Manager

Date of signature: 18 May 2023

For any general enquires relating to this SoI, please contact
alan.ramage@midlothian.gov.uk