

## **Southampton City Council**

### **Statement of Intent for ECO4 and GBIS Flexible Eligibility**

**Publication Date:** 29/11/2023

**Version number:** V2.0

**Published on web site:** <https://www.southampton.gov.uk/our-green-city/council-commitments/sustainable-energy/deals-contracts/>

This statement sets out Southampton City 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 intends to link ECO4 and GBIS Flex applications to its affordable warmth project, Southampton Healthy Homes, to ensure that residents receive additional advice and support from statutory, voluntary and health sector partners across the city.

The Council is publishing this Statement of Intent (Sol), on the 29/11/2023 to confirm that each of the households declared will adhere to at least one of the three available routes outlined below. The tick boxes indicate which routes the council is using:

Note that it is the responsibility of installers to ensure that properties meet the wider ECO4 and GBIS eligibility criteria, for example in respect of tenure, council tax band and pre-project SAP band. This will not be checked by the Local Authority.

**Route 1:** Owner-occupied and private rented sector households with a gross annual household 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>

**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>2</sup>:

- 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.

**Proxy 4)** A child living at the premises is eligible for free school meals, due to low-income<sup>3</sup>.

**Proxy 5)** A person living at the premises is supported by Southampton City Council's Southampton Healthy Homes project (see below for details). This project was established to support people living on a low income and vulnerable to the cold. The criteria for selecting this cohort is based on 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.

<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> National Institute for Health and Care Excellence (NICE) Guidance [NG6]: Excess winter deaths and illness and the health risks associated with cold homes | Recommendations (Recommendation 2) | <https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations#recommendation-2-ensure-there-is-a-singlepointofcontact-health-and-housing-referral-service-for>. Excludes 'low income' proxy.

<sup>3</sup> Under section 512ZB(4) of the Education Act 1996.

**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.
- 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.

**Route 4 [Not used]:** 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.

### **Scheme eligibility**

All potentially eligible households should apply to the council through the Southampton Healthy Homes project (see below) or an ECO / Great British Insulation Scheme installer, to see if they can either benefit from the scheme or be assessed for eligibility under any other relevant programme.

## Referrals

Installers may make referrals via the [ECO4 / GBIS flex referral form](#)<sup>4</sup> subject to satisfactory completion of the Memorandum of Understanding and Data Sharing Agreement. Installers may email [keepwarm@environmentcentre.com](mailto:keepwarm@environmentcentre.com) for more information.

## Southampton Healthy Homes

The Council will also identify eligible households through its Southampton Healthy Homes affordable warmth project. The project is supported by statutory, voluntary and health sector partners across the city to reach the most vulnerable in the community.

A household may be considered eligible for Southampton Healthy Homes for the purposes of Route 2 Proxy 5 if the applicant is able to provide evidence that a member of the household is vulnerable to the cold under NICE Guideline NG6 and that the household meets the criteria the project. Eligibility for Southampton Healthy Homes is assessed on a case-by-case basis, considering the health and financial circumstances of the occupiers.

Southampton City Council work in partnership with the Environment Centre (tEC) charity to deliver Southampton Healthy Homes. Full details are available [online](#)<sup>5</sup>.

The Southampton Healthy Homes team can be reached by:

- Freephone – 0800 804 8601 (Monday to Friday, 9am to 5pm)
- Email – [keepwarm@environmentcentre.com](mailto:keepwarm@environmentcentre.com)

## Shortfall Funding

The Council may be able to provide shortfall funding in the event that insufficient funding is available to cover the full cost of works, subject to household circumstances and relevant terms and conditions. This funding may be accessed through the Southampton Healthy Homes project. The Southampton Healthy Homes team can be reached by:

- Freephone – 0800 804 8601 (Monday to Friday, 9am to 5pm)
- Email – [keepwarm@environmentcentre.com](mailto:keepwarm@environmentcentre.com)

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<sup>4</sup> <https://environmentcentre.com/southampton-city-council-ecoflex-eligibility/>

<sup>5</sup> <https://www.southampton.gov.uk/our-green-city/how-you-can-help/saving-energy-at-home/southampton-healthy-homes/>

## **Marketing**

It is appreciated that Installers may wish to advertise the availability of ECO4 / GBIS flex funding but Southampton City Council requires that Installers participating in the scheme do not claim to be procured by, or working with, Southampton City Council or the Southampton Healthy Homes project without prior express written permission. Similarly, use of logos associated with the council or Southampton Healthy Homes project is prohibited.

Households are free to choose their Installer and so Installers must not claim to be the only source of this funding nor make guarantees of full funding in advance of technical surveys and relevant funding applications.

## **Inappropriate Referrals or Marketing Behaviours**

If Southampton City Council (including the relevant Trading Standards team) believe that an Installer is acting inappropriately, including (but not limited to) submitting false applications or undertaking marketing activities that are not compliant with the above statement or Council's ['no cold calling' rules](#)<sup>6</sup> then the Council reserves the right to suspend applications from this Installer.

## **Declaration and evidence check confirmation**

An LA officer will be responsible for checking, and verifying evidence, and issuing declarations. Southampton City Council will administer the ECO4 Flex scheme according to the Electricity and Gas (Energy Company Obligation) Order 2022 (ECO4 Order). The Council will administer Great British Insulation Scheme Flex according to the Electricity and Gas (Energy Company Obligation) Order 2023 (ECO4A Order).

## **CEO or dedicated responsible person mandatory signature**

The CEO/ dedicated responsible person of the Council will oversee the process of identifying eligible households under ECO4 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.

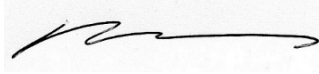
All personal data collected or processed by the Environment Centre (tEC) or Southampton City Council for the purposes of ECO4 Flex or Great British Insulation Scheme Flex will be processed and stored in accordance with: the Council's obligations under UK GDPR and the Data Protection Act 2018, the Council's and the Environment Centre (tEC)'s data protection

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<sup>6</sup> <https://www.hants.gov.uk/business/tradingstandards/consumeradvice/community-support/no-cold-calling-zones/zones>

policies, the Information Commissioner's Office Data Sharing Code and other guidance, and Department for Energy Security and Net Zero guidance.

Signature:



Name: Ian Collins

Job Title: Director – Environment

Date of signature: 29/11/2023

### **Disclaimer**

This document is subject to change following publication of any updated guidance by Ofgem and/or changes to the Council's approach to ECO4 / GBIS flex.

### **Enquiries**

For any general enquires relating to this Sol, please contact the Environment Centre (tEC) at [keepwarm@environmentcentre.com](mailto:keepwarm@environmentcentre.com) or Steven Hayes-Arter (Service Manager – Private Sector Housing & Port Health, Southampton City Council)

[steven.hayes-arter@southampton.gov.uk](mailto:steven.hayes-arter@southampton.gov.uk)