

# Statement of Intent for Energy Company Obligation 4 and Great British Insulation Scheme

## The City of Edinburgh Council Energy Company Obligation 4 and Great British Insulation Scheme Flexible Eligibility Statement of Intent

**Local Authority name: City of Edinburgh Council**

**Publication Date: 08/05/2025**

**Version number: V.5**

**Publication on web site: [www.edinburgh.gov.uk/ECO4](http://www.edinburgh.gov.uk/ECO4)**

This statement sets out the City of Edinburgh Council's flexible eligibility criteria for the Energy Company Obligation (ECO4) and Great British Insulation Scheme (GBIS).

The focus of the ECO4 scheme is on supporting low income and vulnerable households living in the least energy efficient homes by providing financial assistance for a package of housing improvements relating to energy efficiency and low carbon heating, helping to meet the Government's fuel poverty and net zero commitments. The Great British Insulation Scheme will complement and augment the ECO4 scheme via the delivery of predominantly single measures targeted at a wider range of households. Both schemes are scheduled to run until 31 March 2026.

The flexible approach for Local Authorities to identifying fuel poor and vulnerable households who may benefit from heating and energy saving measures is referred to as "ECO4 Flex" and "GBIS Flex". The City of Edinburgh Council are currently in the process of reviewing ECO4 Flex and GBIS Flex mechanisms to understand and realise how they can be maximised in Edinburgh whilst ensuring the protection of consumers.

The following sets out the eligibility criteria, how the schemes are administered, and the role of the Council as the validator.

**IMPORTANT NOTE:** A Declaration issued by the Council will not guarantee funding for 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 supplier in question has 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 will only accept referrals from approved delivery partners<sup>1</sup>. 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 ECO4 Flex declaration would be produced for the household. It is the Council's discretion when selecting potential ECO4 Flex and GBIS Flex delivery partners and when determining whether ECO4 Flex and GBIS Flex can support a pre-existing programme.

## Privacy Notice

Ofgem is the administrator of ECO4 and GBIS. They have publicly available published guidance which states that the funding ECO4/GBIS 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 ECO4/GBIS 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 (i.e., in the case of ECO4/GBIS the occupant or the landlord) a Privacy Notice.

## Scheme eligibility

The Council is publishing this Statement of Intent, on the 22/10/2024 to confirm that each of the households that the Council declares to Ofgem will be eligible via one of the three routes supported in Edinburgh, as outlined below. The check boxes are used to indicate which routes the Council is using:

**Route 1:** Owner-occupied households with a home with an EPC rating of bands D-G and private rented sector households with a home with an EPC rating of bands E-G with a gross annual household income less than £31,000 (this cap applies irrespective of the size of the home, composition, or region).

---

<sup>1</sup> The list of approved installers can be found on the Council's [ECO4/GBIS](#) and [LHEES webpages](#).

☒ **Route 2:** Owner-occupied and private rented sector households with a home with an EPC rating of bands E-G that meet a minimum of two of the following proxies:

**Proxy 1)**<sup>2</sup> Homes in Scotland in a “data zone” in decile one-three of the most recent Scottish Index of Multiple Deprivation.<sup>3</sup>

**Proxy 2)** A person living permanently at the premises is entitled to a Council Tax reduction on the grounds of low income.

**Proxy 3)**<sup>4</sup> 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>5</sup>

**Proxy 4)** A child living permanently at the premises is eligible for free school meals, due to low income. The child must be eligible for free school meals under Section 512ZB(4) of the Education Act 1996 or Section 53 of the Education (Scotland) Act 1980. Further information can be found at [GOV.UK](http://GOV.UK).

**Proxy 5)** A person living at the premises is supported by a scheme established by the City of Edinburgh Council 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. **[Please note that Proxy 5 is not currently supported by the City of Edinburgh Council. The City of Edinburgh Council reserve the right to implement this proxy and update the Statement of Intent accordingly.]**

**Proxy 6)** A household referred to the City of Edinburgh Council 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)**<sup>6</sup> 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). **[Please note, Proxy**

---

<sup>2</sup> Note proxies 1 and 3 cannot be used together

<sup>3</sup> 2020v2. Published at <http://www.gov.scot/publications/scottish-index-of-multiple-deprivation-2020v2-ranks>

<sup>4</sup> Note proxies 1 and 3 cannot be used together

<sup>5</sup> The guidance for Local Authorities from Ofgem lists the suitable evidence and those able to certify for this Proxy in Sections 6.7-6.13 [ECO4 and GBIS Flex Local Authority Guidance \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/eco4-and-gbis-flex-local-authority-guidance)

<sup>6</sup> Proxy 7 cannot be used in combination with proxy 5 or proxy 6

**7 is for supplier owned debt data and is listed here for information only and is not currently supported by the City of Edinburgh Council. The City of Edinburgh Council reserve the right to implement this proxy and update the Statement of Intent accordingly.]**

- 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 third 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 third party deductions.

**Route 3:** Owner-occupied households with a home with an EPC rating of bands D-G and private rented sector households with a home with an EPC rating of bands 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 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 households with a home with an EPC rating of bands D-G and private rented sector households with a home with an EPC rating of bands E-G that are referred under Route 4: Bespoke Targeting. Suppliers and local authorities 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 **[Please note that Route 4 is not currently supported by the City of Edinburgh Council. The City of Edinburgh Council reserve the right to implement this route and update the Statement of Intent accordingly.]**

## **Application process**

All potentially eligible households should view the **City of Edinburgh Council's [ECO4 and GBIS webpage](#)** for a list of its approved ECO4 / GBIS Installers. The potentially eligible households should contact one of the approved Installers, who will be able to confirm if they

can benefit from the scheme (or be assessed for eligibility under any other relevant programme).

The Council will only accept requests for a Declaration from one of the Council's approved ECO4 / GBIS Installers, where a Confidentiality Agreement or Data Sharing Agreement is in place, to ensure data protection requirements are respected.

The Council reserves the right to onboard or remove firms from the list of approved installers in certain situations that the Council deems suitable.

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

A Council officer will be responsible for checking, and verifying evidence, and issuing declarations. For any general enquiries relating to this Statement of Intent please contact [LHEES@edinburgh.gov.uk](mailto:LHEES@edinburgh.gov.uk).

### **Installer Eligibility**

The City of Edinburgh Council has completed a review of Flexible Eligibility to assess various mechanisms of delivery to understand how ECO4 Flex and GBIS Flex can be maximised in Edinburgh whilst minimising risk to the consumer. From the date of publication of this Statement of Intent, requests for Flexible Eligibility funding can be made by any Installer that has gained membership of the Council's ECO4 Approved Installer List and is operating in line with the terms and conditions of the scheme. ECO4 Approved Installers in Edinburgh can be found on the [ECO4 and GBIS webpage](#).

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

The **City of Edinburgh Council** will administer the ECO4 Flex scheme according to the Electricity and Gas (Energy Company Obligation) Order 2022 (ECO4 Order).

The Council will administer the GBIS Flex scheme 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 GBIS 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 **City of Edinburgh Council** for the purposes of ECO4 Flex or GBIS 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.

**Signature:** 

**Name:** Paul Lawrence

**Job Title:** Chief Executive

**Date of signature:** 08/05/2025

For any general enquires relating to this Statement of Intent, please contact [LHEES@edinburgh.gov.uk](mailto:LHEES@edinburgh.gov.uk)