

Statement of Intent for ECO4

Cornwall Council and Council of the Isles of Scilly ECO4

Flexible Eligibility Statement of Intent

Local Authority name: Cornwall Council and the Council of the Isles of Scilly

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| 27 th September 2017 | V1.1 | B. Simpson A. Ball | Final Version approved by Health and Social Care Adults Overview and Scrutiny Committee 27 th September 2017. |
| 1 st February 2019 | V2.1 | B.Simpson A.Ball | Draft for Revision. Approved by Public Health SLT 20 th September 2018 |
| 13 th December 2021 | V3.1 | Anthony Ball Rachel Guy | Draft for revision and joint Cornwall Council and Council of the Isles of Scilly |
| 20 th August 2022 | V4.1 | Anthony Ball Jeanette Duncan Rachel Garmory | Final revised joint Cornwall Council and Council of the Isles of Scilly |
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1. Introduction

Addressing fuel poverty and providing affordable warmth for vulnerable householders are important priorities for Cornwall Council and Council of the Isles of Scilly.

Cornwall and Isles of Scilly have below average levels of fuel poverty, at 12.6% and 11.7% respectively. The England average is 13.4% and too many excess winter deaths, at around 200 a year. Cornwall Council’s ambition is to reduce fuel poverty to 5% by 2030. The Council of the Isles of Scilly is committed to achieving affordable warmth and alleviating fuel poverty. Cornwall and Isles of Scilly are striving to enable vulnerable people to live affordably and comfortably in their own homes, independently for longer, thus reducing costs to NHS, social care budgets.

| Area Code | Area name | No. of Households (1) | No. of Households in Fuel Poverty | Proportion of Households Fuel Poor (%) |
|-----------|-----------------|-----------------------|-----------------------------------|--|
| E06000052 | Cornwall | 255,894 | 32,367 | 12.6 |
| E06000053 | Isles of Scilly | 1,119 | 131 | 11.7 |

To address this preventable health inequality, Cornwall Council and Council of the Isles of Scilly will continue to work with OVO Energy Solutions (OVO—ES) to secure Energy Company Obligation (ECO) funding for ECO home improvements and issue Local Authority Declarations to households¹ and to “approved” LA Flex Installers that Cornwall Council and Council of the Isles of Scilly with a clear emphasis on improving the health and life chances of residents and support them in the cost of living crisis to stay warmer, more efficiently

This statement sets out Cornwall Council and Council of Isles of Scilly flexible eligibility criteria for the Energy Company Obligation (ECO4) scheme from April 2022 – March 2026, also known as “Help to Heat”. The purpose is to identify fuel poor and vulnerable households who may benefit from heating and energy saving measures. The ECO4 scheme will focus on supporting low income and vulnerable households. The scheme will improve the least energy efficient homes helping to meet Government, Cornwall and Isles of Scilly fuel poverty and net zero commitments.

¹

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Cornwall Council and Council of Isles of Scilly welcome 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.

Cornwall Council and Council of the Isles of Scilly published the joint Statement of Intent (SoI), on the 1st September 2022 to confirm that any household for which a LA Declaration is sought will adhere in the first instance for Cornwall to Option A (Ofgem Route 3) **and** Option B (Ofgem Route 1). If a LA Declaration is sought for Isles of Scilly te resident could qualify under Option A **or** Option B. Option C (Ofgem Route 2) will be made available to supplement Option A and B in accordance with OFGEM guidance. Option D will be considered if required.

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| Option A (Ofgem Route 3) | SAP bands D-G households that have been identified as low-income and vulnerable, with an occupant whose health conditions may be affected by living in a cold home AND Option B |
| Option B (Ofgem Route 1) | SAP (EPC) bands D-G households with an income less than £31,000. |
| Option C (Ofgem Route 2), noting that Note proxies 1 and 5 cannot be used together | Proxy 1 - Homes in England in Lower-layer Super Output Area 1-3 (LSOA) |
| | 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. 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 Local Authority (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. |

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| | Proxy 6 - A household referred to for support by their energy supplier, Community Energy Plus (Cornwall based energy charity) or Citizen's Advice Cornwall as struggling to pay for energy. |
| Option D (Ofgem Route 4) | SAP band D-G households that are referred under Route 4: Bespoke Targeting. Suppliers and LAs can submit an application to BEIS where they have identified a low income and vulnerable household, who are not already eligible under the existing routes. |

Example A

Request for LA approval is submitted on behalf of a customer living in a C rated home, with an income of £40,000, after housing and energy costs. This would be rejected.

Example B

Request for LA approval is submitted on behalf of a resident with a health condition, living in a E rated home with an income of £20,000 after housing and energy costs. This would be supported.

Example C

Request for LA approval is submitted on behalf of a resident without any health condition, living in a E rated home with an income under the £31,000 threshold. They earn £20,000 a year and after housing and energy costs their income is assessed as £16,000. This would be rejected as despite living in an energy inefficient home and on a low income, no declared health condition(s).

Procedure

Whilst Cornwall Council and Council of the Isles of Scilly will be responsible for the Local Authority Declaration assessments and the issuing of the Declarations, the final decision on whether any individual household can benefit from energy saving improvements under ECO Affordable Warmth² or their agents/contractors.

The issuing of a Declaration by Cornwall Council and Council of the Isles of Scilly to OVO Energy Solutions (OVO—ES) to secure Energy Company Obligation (ECO) funding or to “approved” LA Flex Installers) will not guarantee installation of measures, as the final decision will depend on:

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- i) A survey carried out by suppliers or its agents/contractors and installation costs calculated;
- ii) The energy and/ or financial savings that can be achieved for a property, and
- iii) Whether suppliers have achieved their targets or require further measures to meet their ECO targets; or
- iv) Whether it falls within the 50% cap of Local Authority Declarations provided for under ECO Affordable Warmth Obligation.

2. Governance

Cornwall Council and Council of the Isles of Scilly is committed to the provision of a fair and transparent process in identifying eligible households under Flexible Eligibility and has implemented the necessary governance structures to oversee the process and ensure independent scrutiny.

Table 3 identifies the named roles and responsibilities for those acting on behalf of Cornwall Council and Council of the Isles of Scilly and responsible for the signing, reviewing and processing of Cornwall Council and Council of the Isles of Scilly's:

- Statement of Intent;
- Local Authority Declarations.

| Table 3 - Statement of Intent and Authorisation of Cornwall Council and Council of the Isles of Scilly Local Authority Declaration | | |
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| Position | Named individual | Responsibilities |
| Chief Executive | Kate Kennally | Signatory for the Statement of Intent Signatory for Cornwall Council Flexible Eligibility Annual Report. Senior Responsible Officer (SRO) |
| Chief Executive | Paul Masters | Signatory for the Statement of Intent Signatory for Cornwall Council Flexible Eligibility Annual Report. Senior Responsible Officer (SRO) |
| Director of Public Health for Cornwall and Isles of Scilly | Rachel Wigglesworth | Signatory for Local Authority Declarations Member of Local Authority Declaration Review Panel |
| Consultant In Public Health (Cornwall) | Caroline Court, Brian O'Neill*, Eunan O'Neill, | Sign off Local Authority Declarations on behalf of Cornwall Council Director of Public Health through delegated authority. '* up to 30 th September 2022. |

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| | Richard Sharpe | |
| Strategic Director Place, Economy & Environment | Nicola Stinson | Sign off Local Authority Declarations on behalf of Council of the Isles of Scilly through delegated authority |
| Advanced Public Health Practitioner (Cornwall Council) | Anthony Ball | Responsible manager for Cornwall Council <ul style="list-style-type: none"> The officer reviewing referred cases and recommendations for award of Local Authority Declarations to householders. Reporting scheme progress to Local Authority Declaration Review Panel. |
| Housing Tenant and Liaison Officer (Council of the Isles of Scilly) | Rachel Guy | Responsible manager for Council of the Isles of Scilly: <ul style="list-style-type: none"> The officer reviewing referred cases and recommendations for award of Local Authority Declarations to householders. Reporting scheme progress to Local Authority Declaration Review Panel. |
| Inclusion Officer (cover Cornwall Council and Council of the Isles of Scilly applications and LA Approvals) | Bev Wilson | Responsible officer for: <ul style="list-style-type: none"> The review of referred cases and recommendations for award of Local Authority Declarations to householders Provision of a Unique Reference Number URN for each declaration issued by Cornwall Council and Council of the Isles of Scilly Maintaining Cornwall Council and Council of the Isles of Scilly's Local Authority Declaration Register |

Table 3. Cornwall Council and Council of the Isles of Scilly Local Authority Declaration roles & responsibilities.

Figure 1 (below) provides an overview of the Local Authority Declaration processing procedure which includes:

- Initial review of the referred case, eligibility checks and a recommendation from the Inclusion Officer as to whether the householder qualifies for the award of a Local Authority Declaration;
- An oversight review of the case file, and the officer's recommendation, as well as a case prioritisation process conducted by Cornwall Council Advanced Public Health Practitioner and Council of the Isles of Scilly's Landlord and Tenant Liaison Officer with formal recommendation for award or rejection of a Local Authority

Declaration to the Director of Public Health (or delegated Consultant in Public Health) or for Isles of Scilly representative.

Table 4 identifies the members of Cornwall Council and Council of the Isles of Scilly's Local Authority Declaration Review panel the members of which are responsible for:

- Scrutinising Cornwall Council and Council of the Isles of Scilly standards and processes in the delivery of Flexibility Eligibility;
- The provision of advice to those signing, reviewing and processing the Council's Local Authority declaration where required;
- Undertaking an annual review of the (ECO) Flexible Eligibility Statement of Intent and Policy.

| Named individual | Responsibilities |
|-------------------------|---|
| Rachel Wigglesworth | Chair (or Vice-Chair) |
| Anthony Ball | Reporting on scheme delivery and for the provision of Cornwall Council's Annual Scheme report |
| Rachel Guy | Reporting on scheme delivery and for the provision of Council of the Isles of Scilly's Annual Scheme report |
| Gemma Finnegan | Voluntary and Community Sector (VCS) representative (external scrutiny and oversight) |
| Mark Deer | Healthcare/housing representative Cornwall Council |
| Jeanette Persich | Healthcare representative Council of the Isles of Scilly |

Table 4. Local Authority Declaration Panel membership.

Cornwall Council Director of Public Health retains accountability for the formal recommendation for award or rejection of a Local Authority Declaration, whilst responsibility for signing rests with the appropriate Consultant in Public Health (Cornwall Council)

Council of the Isles of Scilly Local Authority Declaration will be signed by the Housing Officer on behalf of the Council of the Isles of Scilly.

3. Referrals

Cornwall Council and Council of the Isles of Scilly is committed to providing the residents of Cornwall open access to the opportunities presented through Cornwall Council and Council of the Isles of Scilly Local Authority Declaration and supporting process of Flexible Eligibility.

Further information on working with Cornwall Council and Council of the Isles of Scilly and its Winter Wellbeing partners in the delivery of Cornwall's Flexible Eligibility scheme are available.

To self-refer or refer through trusted intermediary please contact :

Bev Wilson or Lisa Tucker Inclusion Cornwall, 4S (South) New County Hall, Treyew Road, Truro, Cornwall TR1 3AY.

Landline: 01872 326440 or Mobile: 07772 565655 or 07871 982501 or

Email: bev.wilson@cornwall.gov.uk or lisa.tucker@cornwall.gov.uk

Declaration and evidence check confirmation

All potentially eligible households should apply through Cornwall Council (for Cornwall) and Council of Isles of Scilly (for Isles of Scilly) or one of their approved ECO installers to ensure that they can either benefit from the scheme or be assessed for eligibility under any other relevant programme.

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

Web: <https://www.cornwall.gov.uk/health-and-social-care/public-health/public-health-campaigns/winter-wellbeing/> or <https://www.scilly.gov.uk/Existing Statement of Intent>

4. Data protection

Cornwall Council and Council of the Isles of Scilly is committed to working within the bounds of the General Data Protection Regulation (GDPR).

This act requires the Council's to respect principles of fair processing when handling personal information.

The Act also guarantees individuals certain rights in relation to the processing of their data, including the right of access and erasure of personal records processed by the Council's.

Any personal information provided and shared between the Council's, government agencies for reporting purposes and/or their chosen managing agent shall be managed in accordance with the provisions of the GDPR and the council's policies.

Your information will be processed by the Wellbeing and Public Health Service and/or Inclusion Cornwall which are part of Cornwall Council.

The Data Controller for all the information you provide on the forms are Cornwall Council, New County Hall, Treyew Road, Truro TR1 3AY. Data Protection Registration Number: Z1745294. and Council of the Isles of Scilly, the Town Hall, St Mary's, Isles of Scilly TR21 0LW. Data Protection Registration Number: Z5715100.

Cornwall Council is registered as a Data Controller with the Information Commissioners Office (Registration Number Z1745294) under the Data Protection Act (2018).

Council of the Isles of Scilly is registered as a Data Controller with the Information Commissioners Office (Registration Number Z5715100) under the Data Protection Act (2018).

5. Complaints and arbitration procedure

Cornwall Council and Council of the Isles of Scilly maintains a set of standards which outline the service that customers can expect from the Council. These standards and supporting complaints procedure are detailed within Cornwall Council and Council of the Isles of Scilly Customer Promise.

Cornwall Council and Council of the Isles of Scilly Customer Promise and Complaint Procedure are publicly available by request or via Cornwall Council and Council of the Isles of Scilly websites <https://www.cornwall.gov.uk/council-and-democracy/listening-and-learning-compliments-comments-and-complaints/> or <https://www.scilly.gov.uk/complaints>

6. Anti-Fraud, bribery and corruption

Cornwall Council and Council of the Isles of Scilly has a clear commitment and responsibility to minimise the possibility of fraud or other misuse of public money and assets. It pledges to take all action necessary to identify such cases and pursue the recovery of losses and the punishment of those responsible.

An applicant who tries to fraudulently claim support by falsely declaring their circumstances, providing a false statement or evidence in support of their application, may have committed an offence under The Fraud Act 2006.

The Council has implemented a clear network of systems and procedures to assist in the fight against fraud. These arrangements will keep pace with any future developments, in both preventative and detection techniques regarding fraudulent or corrupt activity that may affect the Council's operations or related responsibilities.

The Council's desire to maintain an honest authority, free from fraud and reinforces the 'zero tolerance' stance is detailed in the Council's Anti-Fraud, Bribery & Corruption Policy.

Cornwall Council and Council of the Isles of Scilly Anti-Fraud, Bribery & Corruption Policy is publicly available by request or via Cornwall Council and Council of the Isles of Scilly website. <https://www.cornwall.gov.uk/council-and-democracy/key-council-strategies/> or <https://www.scilly.gov.uk/council/council-finances/anti-fraud-and-corruption-policy>

7. Safeguarding

Cornwall Council and Council of the Isles of Scilly is committed to safeguarding children and vulnerable adults. Cornwall Council and Council of the Isles of Scilly promotes the rights of people who use our services and safeguarding them from harm or neglect.

Cornwall Council and Council of the Isles of Scilly's Safeguarding policies are publicly available by request or via Cornwall Council and Council of the Isles of Scilly's website <https://www.cornwall.gov.uk/health-and-social-care/adult-social->

[care/safeguarding-adults/information-for-professionals/local-safeguarding-adults-policies-standards-and-guidance/](#).

8. Equality and diversity

Cornwall Council and Council of the Isles of Scilly is committed to promoting equality and diversity and tackling social exclusion in all operations of the organisation and the services it provides.



Cornwall Council and Council of the Isles of Scilly's Equality of Opportunity Policy is publicly available by request or via Cornwall Council and Council of the Isles of Scilly's website <https://www.cornwall.gov.uk/media/20664626/cc-equality-of-opportunity-policy-version-21.pdf> or <https://www.scilly.gov.uk/council/council-finances/anti-fraud-and-corruption-policy>

If you would like this information on audio tape, Braille, large print, any other format or interpreted in a language other than English, please contact **The Equalities Team - Cornwall Council Room 4W New County Hall Treyew Road Truro TR1 3AY Tel: 0300 1234 100 or Council of the Isles of Scilly, Town Hall, St Mary's, Isles of Scilly. TR21 0LW Tel : 0300 1234 105**

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Cornwall Council and Council of Isles of Scilly will administer the scheme according to BEIS' 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 ECO4 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 BEIS guidance. As per Section 8 (Performance, Evaluation and review) this document may be amended from time to time.

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| Chief Executive Cornwall Council |  |
| Date | 26 August 2022 |
| Chief Executive Council of the Isles of Scilly |  |
| Date | 30 August 2022 |

For any general enquires relating to this Statement of Intent please contact anthony.ball@cornwall.gov.uk or call 01872 323583