



# Torfaen County Borough Council

## Statement of Intent for Energy Company Obligation 4 (ECO4) and Great British Insulation Scheme (GBIS) Flex

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This “Statement of Intent” sets out the participation of **Torfaen County Borough Council** in the Energy Company Obligation (ECO4) and Great British Insulation Scheme (GBIS) Flexible Eligibility (Flex) scheme as of **30/05/2025**, with the intent to identify households that may benefit from the installation of a measure as part of an ECO4 or GBIS project.

ECO4 and GBIS place legal obligations on energy suppliers to deliver insulation and heating measures to homes, with the aim to reduce home heating costs for fuel poor households and the least energy efficient homes. The Flexible Eligibility (Flex) component of ECO4 and GBIS allows Local Authorities (LAs) to identify and refer consumers that live in private tenure properties and are considered low-income, fuel poor, or vulnerable to the effects of living in a cold home.

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 Council is publishing this Statement of Intent (Sol), on the 30/05/2025 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 England in Lower-layer Super Output Area 1-3 (LSOA), or homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 20192b, or the Index of Multiple Deprivation for 2020, published by the Scottish Government

**Proxy 2)** Householders receiving a Council Tax reduction (based on low income only).

**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.~~ Not currently available in Torfaen.

**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.

\* Note proxies 1 and 3 cannot be used together.

\*\* Not to be confused with Welsh Government policies to offer free school meals to all school children.

\*\*\* Proxy 5 is unavailable. Torfaen County Borough Council does not run a scheme that meets these criteria.

**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 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.

<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835115/loD2019\\_Statistical\\_Release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf)

<sup>2</sup> <https://www.gov.wales/welsh-index-multiple-deprivation-full-index-update-ranks-2019>

## **Scheme Eligibility**

Households wishing to apply for ECO4 scheme funding should contact one of the approved ECO installers listed on the [Warm Wales website](#) who will facilitate the application process and assess eligibility.

Please note that the ECO4 scheme is not a Council funded or managed scheme, many aspects of it are outside the Council's control or design.

## **Administration / Referral Fees**

The current market rate being charged is £300 per application (plus VAT). It is important to note that fees are to be paid by the Installer / Agent / Energy Company and under no circumstances should they be passed on to the householder / customer.

## Governance

The body to which any application for assessment prior to qualification under this Statement of Intent will need to be made shall be delegated to the Community Interest Company -Warm Wales. Torfaen County Borough Council do not accept applications directly. If you wish to make an application for confirmation of grant eligibility, please make an application via the following link: <https://www.warmwales.org.uk/eco/> Warm Wales will guide you through the application process, facilitating access to the Torfaen County Borough approved scheme. Alternatively, you may contact one of the approved ECO installers listed on the Warm Wales website: <https://www.warmwales.org.uk/eco/> Warm Wales shall engage in scheme promotion and conduct vetting of applications via collection of evidential client information. Warm Wales will be solely responsible for referring successful applications to Torfaen County Borough Council for sign off. Torfaen County Borough Council shall issue declaration certificates to eligible applicants. Any third-party agent of a contractor with clients they wish to refer to the council will need to have said clients utilise the vetting services of Warm Wales and have those clients referred to the council via that organisation. The council will not be party to any such arrangement implemented between Warm Wales and any third-party agent of each independent contractor. All contractors wishing to participate in ECO4 Flex and The Great British Insulation Scheme Flex will need prior approval from Warm Wales.

An LA officer (not a 3rd party working on behalf of an LA) will be responsible for checking, and verifying evidence, and issuing declarations. Officers holding the following positions shall be empowered to sign declarations on behalf of Torfaen County Borough Council:

Job Title: Decarbonisation Officer; Environmental Health Officer

Declarations will be valid for 12 months from date of signature.

For any general enquiries relating to this Sol please contact:

[Energy.Management@torfaen.gov.uk](mailto:Energy.Management@torfaen.gov.uk) / [Public.Health@torfaen.gov.uk](mailto:Public.Health@torfaen.gov.uk)

## **Final Decision**

The decision on whether a household receives a measure under flexible eligibility or other ECO funding streams will be made by the energy supplier or their agent / contractor. Qualification in the statement of intent or issuance of a declaration by Torfaen County Borough Council will NOT guarantee installation of a measure, the final decision rests with the supplier. Whilst some measures being grant-funded will be free to the householder at point of sale, others may be partially grant funded and will require a contribution from the householder or agent in order to be delivered.

Any financial or contractual arrangement relating to the installation of a specific measure or home survey or service shall be at the discretion of the homeowner or occupier to accept or decline as they choose. The Council will not be party to any such arrangements; this shall solely be between the householder and any third party of their choice on the Warm Wales list of approved agents / contractors.

## **Liabilities**

Torfaen County Borough Council accept no responsibility or liability resulting from any negative consequence, damage, or loss arising from the acceptance of an ECO FLEX grant. This includes efforts connected with the preparation, application or survey prior to an installation or as a result of works delivered under the scheme. Torfaen County Borough Council do not endorse any specific energy supplier, grant agent, installer or company connected to the application or installation of ECO flex grants or products. Any grievance or issue raised against grant works or application process should be taken up with installing party/agent/financier. Torfaen County Boroughs involvement in the scheme is limited to the declaration of eligibility for grant.

The decision on whether a household receives a measure under flexible eligibility or other ECO funding streams will be made by the energy supplier or their agent / contractor. Qualification in the statement of intent or issuance of a declaration by Torfaen County Borough Council will NOT guarantee installation of a measure, the final decision rests with the supplier.

## **General Data Protection Regulations & Privacy Notice**

In order to access ECO4 funding, personal data will need to be shared with third parties by agents through which any application is made. Torfaen County Borough Council are not able to process or handle applications without involvement of said third parties.

Third parties not the Council, are responsible for sourcing ECO4 funding and arranging installation of measures. For this reason, Torfaen County Borough Council does not consider itself to be the Data Controller as it is not the body responsible for offering or delivering the grant. Torfaen County Borough Council will process all data submitted as part of the scheme in accordance with data protection legislation. Please refer to Newport City Council's Privacy Notice: All data will be managed and stored in accordance with GDPR requirements and relevant legislation. A copy of the Council's Privacy Notice stating how data is managed can be found here - [PN152 - Eco Flex 4 Scheme Privacy Notice | Torfaen County Borough Council](#)

## **CEO or Dedicated Responsible Person Mandatory signature**

Torfaen County Borough Council will administer the Energy Company Obligation (ECO) and Great British Insulation Scheme (GBIS) according to Ofgem guidelines and processes.

The CEO / dedicated responsible persons of the Council will oversee the process of identifying eligible households under ECO 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 Torfaen County Borough Council or its chosen third-party administrator (Warm Wales) 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 data protection policy, the Information Commissioner's Office Data Sharing Code and other guidance, and Department for Energy Security and Net Zero guidance.

**Name:** Stephen Vickers

**Signature:** 

**Job Title:** Chief Executive

**Date of signature:** 20.05.25

## Further Information

For more information on the **routes for eligibility via ECO4 Flex**, please visit the [Energy Company Obligation \(ECO\) Homeowners and tenants](#) page on the Ofgem website.

For more information on the **routes for eligibility via GBIS Flex**, please visit the [Great British Insulation Scheme Homeowners and tenants](#) page on the Ofgem website.

For more information on the **administration of ECO4 and GBIS Flex**, please visit the [Great British Insulation Scheme and ECO4 Local Authority Administration Guidance](#) on the Ofgem website.