Guidance



Great British Insulation Scheme and ECO4 Local Authority Administration Guidance

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This document provides guidance for Local Authorities and Devolved Administrations who wish to participate in the Great British Insulation Scheme (formerly known as ECO+) and / or the Energy Company Obligation (ECO4).

This document outlines how Local Authorities and Devolved Administrations can identify and refer households under the Great British Insulation Scheme and ECO4 Flex mechanisms. It details how Local Authorities can evidence eligible households and how they can work collaboratively with suppliers. Information on submitting Statements of Intent (SoI), declarations, declaration notifications, as well as details on the auditing process, are also included.

For more information on the Great British Insulation Scheme and ECO4 more generally, please visit the Draft Great British Insulation Scheme Delivery Guidance¹ and the ECO4 Delivery Guidance².

¹ https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-delivery-guidance

https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-delivery



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1. About this guidance

- 1.1. The Energy Company Obligation focuses on supporting low-income, vulnerable and fuel-poor households through installation of insulation and heating measures. This policy aims to reduce fuel poverty and energy bills in the long-term and reduce carbon emissions.
- 1.2. The Great British Insulation Scheme is a new energy efficiency scheme for households, which will support the existing Energy Company Obligation Scheme (ECO4) in the delivery of predominantly single measures targeted at a wider range of households.
- 1.3. The Electricity and Gas (Energy Company Obligation) Order 2022 (ECO4 Order)³, or the "ECO4" scheme, covers the period from the commencement date of the ECO4 Order on 27 July 2022 to 31 March 2026. Measures that are completed between 1 April 2022 and 27 July 2022 can contribute towards ECO4; this is called 'ECO4 Early Delivery'⁴.
- 1.4. The Great British Insulation Scheme runs alongside ECO4 from the date of the commencement of the ECO4A Order on 25 July 2023 until 31 March 2026, with early delivery allowed from 30 March 2023. Ofgem will administer the Great British Insulation Scheme in accordance with the Electricity and Gas (Energy Company Obligation) Order 2023 (ECO4A Order)⁵.
- 1.5. The flexible approach to identifying eligible households was introduced via the Local Authority Flexible Eligibility scheme (LA Flex) in April 2017 to target low-income households who are unlikely to be in receipt of means tested benefits. This approach for Local Authorities (LAs) and Devolved Administrations (DAs), has been reformed to improve targeting under the Great British Insulation Scheme and ECO4.
- 1.6. Ofgem (the Office of Gas and Electricity Markets) is the administrator of both schemes.
 This document provides guidance on how Ofgem ('we', 'our' and 'us' in this document)

³ www.legislation.gov.uk/uksi/2022/875/made

 $^{^4 \ \, \}text{See the Supplier Administration Guidance for more information} \\ \underline{\text{www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-supplier-administration-v10}}$

will administer Flex within the Great British Insulation Scheme and ECO4, in line with the requirements of the ECO4A Order and ECO4 Order⁶.

- 1.7. The overall policy for the scheme is set by the Department for Energy Security and Net Zero, previously known as the Department for Business, Energy and Industrial Strategy (BEIS).
- 1.8. For ECO4, this guidance applies to all measures installed from the date of the commencement of the ECO4A Order on 25 July 2023. For measures delivered before (25 July 2023) please refer to the ECO4 Guidance: Local Authority Administration⁷.
- 1.9. For the Great British Insulation Scheme, this guidance applies to measures installed under the ECO4A order from Early Delivery on 30 March 2023 onwards.
- 1.10. This document (Great British Insulation Scheme and ECO4 Guidance for Local Authorities) addresses the following:
 - a) The roles and responsibilities of all parties
 - b) How to identify and evidence eligible consumers
 - c) Explain Statement of Intents and how to use them
 - d) How to make a declaration and notification for referred households
 - e) Explain Ofgem's audit process

⁶ https://www.legislation.gov.uk/uksi/2022/875/contents/made

⁷ https://www.ofgem.gov.uk/publications/eco4-guidance-local-authority-administration

Useful links

Draft Great British Insulation Scheme Delivery Guidance:

https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-delivery-guidance

ECO4 Delivery Guidance:

https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-delivery

Department for Business, Energy & Industrial Strategy ECO4 Consultation:

 $\underline{https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-\underline{eco4-2022-2026}}$

Department for Business, Energy & Industrial Strategy ECO4 Government Response:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1065823/eco4-government-response.pdf

Government response to the Energy Company Obligation (ECO+: 2023 – 2026) consultation

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/1148327/design of the energy company obligation 2023-2026 gb insulation scheme - government response.pdf

Department for Business, Energy & Industrial Strategy ECO+ consultation: Consultation Stage Impact Assessment

https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-eco-2023-2026?utm medium=email&utm campaign=govuk-notifications-topic&utm source=488af54d-2946-4175-83d0-74060a586613&utm content=daily

Draft Great British Insulation Scheme and ECO4 Flex Data Dictionary

https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme

The Electricity and Gas (Energy Company Obligation) Order 2022

https://www.legislation.gov.uk/uksi/2022/875/contents/made

Draft Electricity and Gas (Energy Company Obligation) Order 2023

https://www.legislation.gov.uk/ukdsi/2023/9780348248340

2. Introduction

- 2.1. The Energy Company Obligation (ECO), of which the Great British Insulation Scheme forms a part, was first introduced in 2013 and is an energy efficiency scheme for Great Britain. ECO places legal obligations on energy suppliers to deliver energy efficiency and heating measures to domestic premises, and aims to reduce home heating costs for low-income, fuel poor and vulnerable people.
- 2.2. The flexible eligibility component of ECO allows Local Authorities (LAs) or Devolved Administrations (DAs) to engage with energy suppliers / installers, to refer private tenure households that are considered to be low-income, vulnerable to the effects of living in a cold home, or fuel poor.
- 2.3. The ECO1 scheme ran between 1 January 2013 and 31 March 2015. The ECO2 scheme then ran from 1 April 2015 to 31 March 2017. This scheme was then extended and ran from 1 April 2017 to 30 September 2018 and was referred to as ECO2t. The 'LA Flex' component of the scheme was introduced as part of the changes to the scheme in April 2017. The ECO3 scheme ran from 3 December 2018 to 31 March 2022.
- 2.4. ECO4 commenced on the 27 July 2022 and will run until 31 March 2026, focusing on whole-house retrofits with the aim to encourage the installation of insulation, renewables and district heating connections, as well as upgrading inefficient heating systems.
- 2.5. The Great British Insulation Scheme will run from the date of commencement of the ECO4A Order on 25 July 2023 until 31 March 2026. Ofgem will administer the scheme in line with the requirements of the ECO4A Order.
- 2.6. The Great British Insulation Scheme continues ECO4's focus on improving the least energy efficient homes but is predominantly a single measure scheme with extra measures being eligible under certain conditions.

3. Overview of ECO4 and Great British Insulation Scheme Flex

- 3.1. Where a LA wishes to participate in ECO4 Flex and/or Great British Insulation Scheme Flex they are expected to follow this guidance. In addition, we have also produced Delivery Guidance for the entire ECO4 scheme⁸, and the Great British Insulation Scheme⁹, that all stakeholders are required to follow.
- 3.2. This chapter provides an overview of the ECO4 and Great British Insulation Scheme Flex processes for LAs and DAs, as well as the key roles and responsibilities of other relevant parties involved. The following chapters provide further detail on identifying eligible households and relevant documentation.

Overview of the ECO4 scheme

- 3.3. ECO4 places a legal obligation on obligated suppliers¹⁰ to reduce heating costs for low-income and vulnerable households by delivering energy efficiency and heating measures. One route to identify eligible households is through ECO4 Flex, where LAs, the Scottish and Welsh Governments, and suppliers identify households that meet the eligibility requirements set out in the ECO4 Order.
- 3.4. Suppliers can deliver up to 50% of their obligation through the ECO4 Flex route. Delivery under ECO4 Flex is optional for LAs, DAs, and suppliers.
- 3.5. The main objective of the scheme is to reduce household heating costs by improving the least energy efficient housing stock occupied by low-income and vulnerable households. Under ECO4, suppliers with more than 150,000 domestic customer accounts are obligated, subject to supply volumes of 300 GWh / year electricity and 700 GWh / year gas.
- 3.6. The overall obligation period for ECO4 runs from the commencement of the ECO4 Order on 27 July 2022 to 31 March 2026 and is split into four phases:

⁸ https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-delivery

⁹ https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-delivery-guidance

¹⁰ https://www.ofgem.gov.uk/eco-supplier-contact-details

Phase 1: 27 July 2022 to 31 March 2023

Phase 2: 1 April 2023 to 31 March 2024

Phase 3: 1 April 2024 to 31 March 2025

Phase 4: 1 April 2025 to 31 March 2026

- 3.7. For each phase of ECO4, a supplier is allocated a proportion of the overall obligation depending on its relative share of the gas and electricity market. A supplier must achieve its obligation before 1 April 2026.
- 3.8. Homes with an Energy Performance Certificate (EPC), band of D-G may be eligible for the scheme, providing certain conditions are met. There is a minimum requirement of improving band F or G homes to at least band D, and band D or E homes to at least a band C. This requirement is to encourage the delivery of multiple measures to a home for a more complete upgrade of the least efficient homes.
- 3.9. Installations under the ECO4 scheme are referred to as 'measures' and the full package of measures that are delivered to a household to meet the minimum requirements is an 'ECO4 project'.
- 3.10. A list of the measures that can be delivered under ECO4 can be found on our ECO4 measure table¹¹.

Overview of the Great British Insulation Scheme

- 3.11. As with ECO4, suppliers with more than 150,000 domestic customer accounts are obligated under the Great British Insulation Scheme, subject to supply volumes of 300 GWh / year electricity and 700 GWh / year gas.
- 3.12. The Great British Insulation Scheme broadens the eligibility pool from ECO4 by including 2 eligibility groups. The first group is the low-income group, which is for those referred by a local authority, devolved administration or energy supplier

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¹¹ https://www.ofgem.gov.uk/publications/eco4-project-forms-and-tables

participating under Great British Insulation Scheme Flex, as well as for those on certain means tested benefits.

- 3.13. The second group is a general eligibility group that will expand provision to all homes within Council Tax bands A-D in England and A-E in Scotland and Wales with an EPC of D or below.
- 3.14. There is a requirement within The Great British Insulation Scheme that at least 20% of each annual target must be delivered to the low-income group. Delivery to the remaining 80% will be unconstrained giving freedom to suppliers to choose who they deliver to; it may be delivered solely to the general eligibility group or a mix of both groups.
- 3.15. Up to 80% of a supplier's low-income minimum requirement can be met through Great British Insulation Scheme Flex. Households notified under Great British Insulation Scheme Flex will be classified as part of the low-income eligibility group, but their contribution to the low-income minimum requirement of 20% of the annual phase target is limited to 80%. Outside of this 80%, unlimited delivery of Great British Insulation Scheme Flex is permitted (but this will not contribute any further to the supplier's low-income minimum requirement).
- 3.16. The remaining 20% of each supplier's low-income minimum must be delivered to households on means-tested benefits (the eligible benefits mirror those for the Help to Heat Group (HTHG) under ECO4). This is to ensure at least some support is reserved for those households. Please note that it does not form part of the role of the LA to monitor these caps, and this information is provided as an overview of the scheme.
- 3.17. The overall obligation period for the Scheme runs from the commencement date of the ECO4A Order on 25 July 2023 to 31 March 2026 and is split into three phases:
 - Phase A: Date of commencement of the ECO4A order on 25 July 2023 to 31
 March 2024
 - Phase B: 1 April 2024 to 31 March 2025
 - Phase C: 1 April 2025 to 31 March 2026

Roles and responsibilities

3.18. The roles of LAs, the Scottish and Welsh Governments, suppliers, Ofgem and the Department for Energy Security and Net Zero are detailed below.

Table 1: Summary of the roles and responsibilities of the different organisations involved in flexible eligibility

Organisation	Summary of roles and responsibilities	
	 LAs / DAs can volunteer to participate in ECO4 Flex and/or Great British Insulation Scheme Flex to identify eligible households. To participate, a LA / DA will need to publish a signed Statement of Intent (SoI) in line with the Ofgem template¹², which outlines their intention to participate in the schemes and their commitment to follow the scheme rules and routes as set out in the ECO4 Order¹³ and the ECO4A Order. 	
Local Authority / Devolved Administration	 LAs / DAs are responsible for determining whether households are eligible under one of the Flex Routes and will also need to produce declarations to suppliers / installers for all households they identify. The householder eligibility criteria for Routes 1-3 are the same for both schemes (Route 4 is for ECO4 only). If LAs / DAs are participating in both schemes, for eligibility Routes 1-3 LAs / DAs will not be required to indicate on the declaration or declaration notification template for which scheme they are referring the household for. It will be the responsibility of the supplier / installer to determine which scheme is most suitable for the household. See Identifying eligible consumers for further information on referral routes. LAs / DAs can identify households in their area and for other areas where they have been given delegated authority from another LA / DA. Declaration notification LAs / DAs must submit a declaration notification to Ofgem for all 	
	 LAs / DAs must submit a declaration notification to Ofgem for all households they identify. It is up to the LA / DA to decide how 	

¹² https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme

¹³ https://www.legislation.gov.uk/uksi/2022/875/made

they wish to communicate with the supply-chain and inform them that the declaration notification has been sent.

Evidence holding requirements

- For measures where LAs / DAs have determined eligibility, the supplier is responsible for ensuring the LAs / DAs have collected and retained the evidence, which suppliers need necessary access for audit purposes, for up to three years after the Final Determination of the relevant scheme at a minimum.
- Where an insulation measure is installed as part of an ECO4 project or via The Great British Insulation Scheme, the insulation measure is installed by, or under the responsibility of, a person who is registered with TrustMark for the purposes of that measure, and a certificate of lodgement is issued by the operator of TrustMark in respect of that measure, or the insulation measure is installed subject to arrangements equivalent to TrustMark.

SAP bands

- Suppliers / installers are responsible for checking and confirming each individual household's SAP bands, via an RdSAP assessment conducted at the premises before a determination is made on which of the schemes is most suitable for the household, and what measures might be appropriate to install.
- Suppliers / installers must consult with the LA or DA about the carrying out of measures in the premises, before the day on which the measure or project is completed. See Table 5 for SAP band eligibility requirements.

Suppliers are responsible for ensuring they meet their obligations under the schemes, and that measures installed under the Great British Insulation Scheme are delivered in line with the lowincome minimum requirement.

Supplier /

Installer

Supplier measure notifications

- The ECO4 or Great British Insulation Scheme Flex route used to identify households and the measure(s) installed at the relevant home should be notified to Ofgem.
- Suppliers can use their own energy debt data to identify and refer eligible households through ECO4 and Great British Insulation Scheme Flex (Supplier Flex) or work with relevant authorities under the scheme (LA Flex). Where suppliers self-refer an eligible ECO4 or Great British Insulation Scheme Flex household via Supplier Flex they must produce details of this on their measure notification.

Evidence holding requirements

 For measures where LAs / DAs have determined eligibility, the supplier is responsible for ensuring the LAs / DAs have collected and retained the evidence, which suppliers need necessary access for audit purposes, for up to three years after the Final Determination of the relevant scheme at a minimum. Where

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	suppliers self-refer an eligible household via Supplier Flex, they
	must collect and retain the evidence.
	 If evidence is found to be insufficient or incorrect during an audit, and a supplier is unable to provide satisfactory reason for the error, the measure may be rejected.
	 Ofgem administers ECO4 and the Great British Insulation Scheme and produces guidance for suppliers / installers, LAs / DAs and supply-chain members.
	Ofgem has set up a process to receive declaration notifications from LAs and to check these against supplier notifications.
	Ofgem is responsible for delivering the annual LA Flex audits.
Ofgem	 Ofgem is responsible for determining whether a supplier has achieved its obligations, including relevant minimum requirements and caps.
	 Ofgem has no remit in approving any data-sharing agreements between local authorities and obligated suppliers or installers and are not responsible for the data handling between them. UK GDPR requirements need to be followed when sharing data between parties.
The Department	The Department for Energy Security and Net Zero is responsible for setting the overall policy for the scheme.
for Energy Security and Net Zero	The Department for Energy Security and Net Zero is responsible for reviewing/approval LA and supplier proposals for new methods of identify households under ECO4 Flex Route 4.
TatMa.ul. a.u.d	 TrustMark is responsible for ensuring installers comply with PAS¹⁴ and MCS standards¹⁵ and that appropriate guarantees are in place¹⁶.
TrustMark and	 Measures installed according to PAS or MCS must be installed by,
TrustMark Equivalent	or under the responsibility of, a person who is registered with TrustMark for the purposes of that measure.
Organisations	 For measures not referred to in PAS or under MCS, such as some DLMs and IMs, installation must be subject to arrangements for quality assurance and consumer protection, including installation

¹⁴ PAS 2035:2019 covers the whole life cycle of a retrofit project, from the initial engagement with a client, through the assessment, design, installation and subsequent evaluation and monitoring stages that should be undertaken to ensure that suitable energy efficiency measures are installed appropriately to the right premises.

¹⁵ MCS is a standards organisation, creating and maintaining standards for the certification of low-carbon energy technologies, installers, and their installations. MCS certified installers are required to follow standards that ensure good performance and that installers are technically safe and competent.
¹⁶ Further information on TrustMark can be found in their <u>Consumer Charter</u>, <u>Code of Conduct and defined Codes of Practice and Standards</u>

standards and arrangements for repairs and other remedies,
which are equivalent to what TrustMark requires.

Working with energy suppliers

- 3.19. There are a number of potential delivery models that could be followed under flexible eligibility, and it will be up to the supplier, or their intermediaries, and LAs / DAs to agree them for each area.
- 3.20. LAs / DAs should be aware that a supplier must provide information to Ofgem on measures delivered under the schemes and as such the suppliers will require information from the LA / DA to support this, including necessary access to household eligibility evidence they have collected.
- 3.21. Suppliers, installers and LAs / DAs are free to and encouraged to establish their own working relationships. There are no formal processes implemented by Ofgem or the Department for Energy Security and Net Zero to do this.
- 3.22. LAs / DAs should ensure it is made clear to residents that the inclusion of a household in a LA / DA declaration does not guarantee a measure will be installed in their home by an energy supplier. Decisions by energy suppliers on whether to install a measure may depend on:
 - survey carried out by suppliers, or their agents / contractors and installation costs calculated,
 - ii) the energy savings that can be achieved for a property,
 - iii) whether suppliers have achieved, or are close to achieving, their targets, and
 - iv) other commercial considerations.
- 3.23. LAs / DAs should additionally make it clear to their residents that suppliers will carryout an assessment to decide which measure(s) their property should receive. This will be decided by the supplier and should subsequently be shared with the LA / DA.
- 3.24. It is encouraged that LAs / DAs and suppliers establish robust partnerships with a strong understanding of mutual roles and responsibilities that provide a positive

customer journey for fuel poor and vulnerable households. As a result of this, situations where customers expect a measure that is then not delivered should be avoided.

4. Identifying eligible consumers

ECO4 Flex and Great British Insulation Scheme Flex Referral routes

- 4.1. The ECO4 Order outlines four separate routes to identify low-income and vulnerable households under ECO4 Flex. All four routes can be used by a single LA and each route must be used independently.
- 4.2. Under Great British Insulation Scheme Flex, three of these four qualifying routes can be used to identify eligible households (Routes 1, 2 and 3 can be used under either scheme. Route 4 is for ECO4 Flex only). The first three routes can be used by a single LA for Great British Insulation Scheme Flex, and each route must be used independently.
- 4.3. When sending declarations to suppliers to notify them of identified eligible households, LAs / DAs are not required to specify which scheme is more suitable for the household. This can be determined by the supplier / installer following the RdSAP assessment. LAs/ DAs should indicate whether they have published an SoI for ECO4 Flex only, or a combined SoI for both ECO4 and Great British Insulation Scheme Flex, using the tick boxes on the declaration template.
- 4.4. Where a LA identifies a household or is notified of an eligible household by a 3rd party, the LA must ensure that the household meets one of the eligibility routes and that an LA officer has seen and collected evidence to demonstrate this. It will be up to the LA to ensure they have sufficient evidence requirements in place and that suppliers have access to this. Where suppliers are not able to provide sufficient evidence during audits, measures may potentially be rejected. We have provided a non-exhaustive list of examples of acceptable evidence in Table 4.
- 4.5. Households identified must be private tenure, ie owner-occupied or private rented sector households. For more information on how to evidence household tenure type see Chapter 3 in the ECO4 Delivery Guidance¹⁷. Properties owned or let by a social landlord can only receive ECO4 or Great British Insulation Scheme measures where it is let by the social landlord at or above market rate, ie meeting the private domestic premises requirement. This will be checked by the supplier during the RDSAP

¹⁷ https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-delivery

- assessment. For more information on how to evidence market rate see Appendix 2 in the Great British Insulation Scheme Delivery Guidance.
- 4.6. There are some differences in the eligible pre-installation SAP bands for each route between ECO4 and Great British Insulation Scheme Flex. However, LAs / DAs are not responsible for checking household SAP bands, as this is the responsibility of the supplier / installer. See 4.19 for information of SAP band eligibility.

Table 2: Great British Insulation Scheme and ECO4 Flex Referral Routes

Route	Explanation		
Route 1: Household Income	Households with a gross annual income of less than £31,000 (including overtime payments and interest earned on savings) This cap applies irrespective of the property size, composition or region and is from all sources of income, including both non means tested and means tested benefits.		
	This is the combined whole household income, including every person 18+ years living at that address who receive an income from any source, such as lodgers and elderly relatives etc.		
Route 2:	Households that meet at least two of the following proxies.		
Proxy Targeting	Proxies 1 & 3 cannot be used in combination with each other. Proxy 7 cannot be used in combination with proxy 5 or proxy 6		
	Proxy 1) Homes in England in Lower-layer Super Output Area (LSOA)1-3 on the English Indices of Deprivation 2019 ¹⁸ , or homes in Wales in LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019 ¹⁹ , or homes in Scotland in "data zone" 1-3 on the Scottish Index of Multiple Deprivation 2020 ²⁰		
	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)		

¹⁸ 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".

 $^{^{19}}$ Published at https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Welsh-Index-of-Multiple-Deprivation/WIMD-2019

²⁰ 2022v2. Published at https://www.gov.scot/publications/scottish-index-of-multiple-deprivation-2020v2-ranks/

Guidance NG6: Recommendation 2, for a reason other than their low-income²¹

Proxy 4) A child living at the premises is eligible for free school meals, due to low-income²²

Proxy 5) A person living at the premises is supported by a scheme established by the LA/DA that is named and described within their Statement of Intent.

Note: LAs wishing to use this proxy must provide the name of the LA run scheme they wish to use as well as providing a short description as to how the scheme supports householders who are living on a low-income and are vulnerable to the cold under NICE Guideline NG6.

Proxy 6) A person living at the premises has been referred to the LA/DA for support by their energy supplier, Citizens Advice or Citizens Advice Scotland because they have been identified by the referrer as struggling to pay their gas or electricity bills.

Proxy 7) 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 3rd 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 3rd party deductions.

Route 3: NHS Referrals

Households referred to the LA/DA as housing a person suffering from a severe or long-term ill-health condition which is adversely affected by living in a cold home.

The person's severe or long-term health condition must be due to:

• A cardiovascular condition,

²¹ https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations#recommendation-2-ensure-there-is-a-singlepointofcontact-health-and-housing-referral-service-for

²² Under section 512ZB(4) of the Education Act 1996 or section 53 of the Education (Scotland) Act 1980

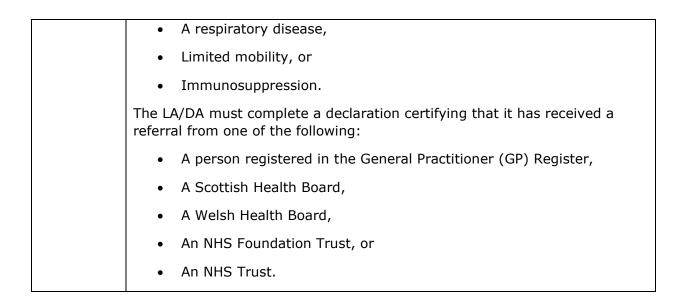


Table 3: Referral Route 4: ECO4 Flex Only

Route	Explanation		
	Route 4 is for ECO4 Flex only, this route does not apply to Great British		
	Insulation Scheme Flex. Suppliers and LAs can submit a proposal via the		
	Route 4 Bespoke Targeting Application form ²³ to the Department for Energy		
	Security and Net Zero (beisecoteam@beis.gov.uk) where they have		
	identified new methods to identify low-income and vulnerable households.		
	The application must be approved by or on behalf of the Department for		
Route 4:	Energy Security and Net Zero Secretary of State (SoS).		
Bespoke			
Targeting	Applications need to demonstrate a number of factors, aside from living in		
	an owner-occupied D, E, F, or G SAP band property or for homes in the		
	private rented sector E, F or G home. Applicants will also need to		
	demonstrate, underpinned by evidence, that the proposed methodology is		
	more effective at identifying households in fuel poverty than the criterion		
	offered under Routes 1 and 2.		

Applications should also demonstrate that assistance reaches the majority of households who are not in receipt of any means tested benefits that fall within the help to heat group benefits:

- a) over 50% of the premises that meet the criteria are not occupied by a member of the help to heat group, and that
 - at least 75% of the premises that meet the criteria are owneroccupied premises occupied by at least one person living in fuel poverty; or
 - ii) at least 90% of the premises that meet the criteria are private rented premises occupied by at least one person living in fuel poverty.

Owner-occupier D, E, F, and G and private rented sector E, F, and G properties may qualify for ECO4 Flex route 4, providing that the LA is consulted by the supplier prior to completed installation, and that their supporting supplier or LA application has been approved by the Secretary of State, (SoS).

 Once the Department for Energy Security and Net Zero has approved an application a reference number will be provided, and this should be notified to Ofgem for all relevant projects. The 10% uplift is only awarded subject to all criteria and minimum requirement rules being met.

Route 2 Proxy Targeting: Premises in a LSOA or the Index of Multiple Deprivation

- 4.7. Under Route 2 proxy 1, premises located in England, in an area identified as a LSOA in the first, second or third decile on the Index of Multiple Deprivation for 2019 published by the Ministry of Housing, Communities and Local Government, can be referred for ECO4 and Great British Insulation Scheme Flex.
- 4.8. In the case of premises located in Wales, homes in an area identified as a LSOA in the first, second or third decile on the Welsh Index of Multiple Deprivation 2019 published in November 2019 by the Welsh Government may also be referred for the schemes.
- 4.9. In the case of premises located in Scotland, homes in a data zone which is identified as being in the first, second or third decile on the Index of Multiple Deprivation for 2020 published in April 2020 by the Scottish Government, may also be referred for the schemes.

4.10. All cases must be used in isolation of each other and combined with another Route 2 proxy from the list, apart from proxy 3.

Route 2 Proxy targeting: Supplier provided data or Citizens Advice²⁴ referral under proxy 6

4.11. Under Route 2, suppliers and Citizens Advice, or Citizens Advice Scotland, have the option to work with the LA by referring customers to the LA for support with their energy bills.

LA and supplier referral:

- 4.12. Where a household has been referred to the LA for support by their energy supplier using debt data elements (similar to those outlined in proxy 7), and the LA combines this with one other proxy from 1-4, the LA must sign the declaration.
- 4.13. Supplier Flex is separate policy that does not require any evidencing from an LA. Suppliers can use all their own energy debt data to refer household under Route 2 from Table 2 above. The same rules of Route 2 needing two proxies apply, and for Supplier Flex suppliers must combine one other proxy from 1-4 with their own data in proxy 7.

LA and Citizen's Advice referral:

4.14. To refer households for the scheme, Citizens Advice, or Citizens Advice Scotland, must produce a signed referral letter to the LA confirming that they have identified a householder as struggling to pay their gas and/or electricity bills. A template referral letter can be found on the Ofgem website on the same webpage as our ECO4 and Great British Insulation Scheme LA Administration Guidance.

²⁴ Also refers to Citizen's Advice Scotland.

4.15. Citizen's Advice will only need to refer a household to a LA, and they will not need to find the second proxy combination (the second proxy combination would need to be identified by the LA).

Evidencing eligible households

- 4.16. We expect that for all households identified as eligible through ECO4 and/or Great British Insulation Scheme Flex, evidence of eligibility will need to be collected and retained by the LA, and the supplier should have access to this. Ofgem will not be collecting this evidence but will be able to request it from suppliers where issues arise with measures (eg mismatch between LA declaration notification and measure notification) or during audits (further information on audits in Chapter 7 Audits). Where suppliers are not able to provide sufficient evidence during audits, measures may be rejected.
- 4.17. We may request declarations, and any evidence to support the eligibility route, for up to three years after the Final Determination of the schemes, as per the wider data retention policies in ECO²⁵ and Great British Insulation Scheme²⁶, in the case that suppliers need to support the eligibility of a measure. It is therefore the responsibility of suppliers to ensure they collect and retain declarations and have necessary access to evidence collected by LAs / DAs for this period.
- 4.18. However, to support LAs in determining what is sufficient evidence, we have provided a **non-exhaustive** list of forms of evidence in Table 4.

²⁵ https://www.ofgem.gov.uk/publications/eco-privacy-notice

²⁶ https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-privacy-notice

Table 4: Examples of suitable evidence for each of the ECO4 and Great British Insulation Scheme Flex referral routes

Referral	Evidence			
Route				
Route 1: Low- income	 Most recent year's tax return / P60 documentation. If this was issued 6+ months from when the LA dates and issues the declaration, it may only be used in combination with additional evidence. If the householder has multiple jobs, then the householder will need to provide P60s for each job. Where additional income is being received that's not visible on the P60, additional evidence must also be provided e.g. bank statement(s) covering consecutive 3-month period from within the last 4 months prior to when the LA dates and issues the declaration. Most recent year's annual income pension statement. Or if notified monthly, three from within the last 4 months prior to when the LA has dated and issued the declaration. Three payslips alongside bank statements from within the last 4 months prior to when the LA has dated and issued the declaration, from all accounts receiving an income. Evidence such as P45 from within the last 4 months prior to when the LA has dated and issued the declaration can be used in combination with other supporting evidence. As route 1 is based on the whole household income, provide confirmation of the number of adults residing at the address via council tax letters / tenancy agreements / mortgage statements / electoral register / soft credit check. Bank statements used as evidence for Route 1 should show credit payments received, and the householder's name and address. Other information can be redacted if the householder wishes, provided that it is clear that there has been no redaction of payments received. In cases where vulnerable customers are struggling to provide sufficient evidence, this can be dealt with on a case-by-case basis. LAs can take a view on what is appropriate and may ask Ofgem for advice where a specific household is struggling to provide requested evidence. 			
Route 2:	 Screenshot from the LA confirming the household is within an eligible LSOA area, supported by Office for National Statistics (ONS) data: https://onsdigital.github.io/postcode-lookup/. 			
targeting	Copy of council tax reduction eg a photo, an email, a PDF with name and address; or letter confirming reduction from LA.			

- Signed referral letter from a Doctor, GP or other health professionals
 with a valid NHS email identifying that a person living at the premises is
 considered to be vulnerable to the cold and suffers from a health
 condition as stated in the NICE guidance: Recommendation 2, for a
 reason other than their low-income. Or at least one of these nonexhaustive suggestions in written form, (we recommend providing more
 for greater certainty):
 - An NHS Summary Care Record provided it clearly states that the patient suffers from a health condition as stated in the NICE guidance or receives medication for the condition. The Summary Care Record must be authenticated with the GP practices stamp.
 - People with cardiovascular conditions: hospital diagnosis letters, social worker referrals, copy of repeat prescriptions for child with asthma, or copies of referral letters to certain groups that help people with these conditions.
 - People with disabilities: PIP, DLA or Attendance Allowance award notices.
 - Older people (65 and older): birth, marriage certificate, passport, copy of bus pass, or pension statement.
 - Households with young children (5 or under): birth certificate,
 school enrolment letter, or passport.
 - Pregnant women: MAT B1 form to prove the householder was pregnant when the LA signed and issued the declaration.

LAs can take a view on what is appropriate for how recent evidence must be at the point of application i.e. when LAs send the declaration notification to Ofgem. For instance, if dated less than a year, annual allowances / awards are suitable.

- Signed letter from local coordinator / local authority that proves the household was eligible for a LA-run scheme.
- Eligibility Checking Service (ECS)²⁷, documentation showing eligibility for free school meals due to low-income provided by the Department for Education or from the school²⁸.

²⁷ fsm.education.gov.uk

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²⁸ See https://www.gov.uk/government/publications/free-school-meals-guidance-for-schools-and-local-authorities

PPM / non-PPM evidence (supplier provided data): • Customer tariff data to indicate the customer's payment method. Official letter signed by either an NHS trust, NHS foundation trust, NHS health
oard or a person registered in the General Practitioner Register. We would ccept referrals sent from any health professional with a valid NHS email. If rovided as a physical letter, this should be on headed paper and authenticated with the GP surgery stamp. The letter will need to state that the official signing the letter considers someone in the household to be suffering from one of the our health conditions listed in Table 2, and that the health of the person is diversely affected by living in a cold home. The link to a generic letter template an be found on our Ofgem website.*
oute 4 is applicable to the ECO4 scheme only. The evidence for this will be ssessed as part of a Department for Energy Security and Net Zero led panel ssessment.
co ro rit ne ou dr ar

* In recognition of doctor's and GP's time and effort, and to reduce their administrative burden, we have published a standard referral letter³⁰ on our website that can be used for Route 3 and Route 2, proxy 3 unless the doctor / GP wants to use their own letter. For Route 2, proxy 6 we have published a standard referral letter for Citizen's Advice³¹. We have also published an installer verification letter³² so that surveyors can notify eligible households to the LA, and a household application form³³ to allow eligible households to apply to their LA.

³⁰ <u>https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme</u>

³¹ https://www.ofgem.gov.uk/sites/default/files/2022-

^{09/}Citizen%E2%80%99s%20Advice%20referral%20letter%20template-%20ECO4%20Flex.docx

³² https://www.ofgem.gov.uk/sites/default/files/2022-11/Final%20-

^{%20}ECO4%20Flex%20Installer%20Verification%20Letter.docx

³³ https://www.ofgem.gov.uk/sites/default/files/2022-

^{11/}ECO4%20Flex%20householder%20application.docx

ECO4 and the Great British Insulation Scheme LA and Supplier Flex Routes: SAP band eligibility

- 4.19. LAs / DAs are not required to check household SAP bands to confirm that households are within an eligible SAP band for the relevant referral Route. This is the responsibility of the supplier / installer. Suppliers / installers must conduct an RdSAP assessment at the premises before a determination is made on what measures might be appropriate to install and are required to ensure that the household is within an eligible SAP band for the referral route, tenure type and scheme that measures are to be installed under.
- 4.20. There are some differences in the eligible pre-installation SAP bands between ECO4 and the Great British Insulation Scheme. These are outlined in Table 5.

Table 5: Comparison between ECO4 and the Great British Insulation Scheme LA and Supplier Flex Routes: SAP band eligibility

ECO4		
Route	SAP Bands	Tenure Type
Route 1	D, E, F, G	Owner-occupied
	E, F, G	PRS*
Route 2	E, F, G	Owner-occupied
	E, F, G	PRS
Route 3	D, E, F, G	Owner-occupied
	E, F, G	PRS
Route 4	D, E, F, G	Owner-occupied
	E, F, G	PRS
*0		rk3

Great British Insulation Scheme		
Route	SAP Bands	Tenure Type
Route 1	D, E, F, G	Owner-occupied
	D, E (including F	PRS
	and G if exempt	
	from MEES*)	
Route 2	E, F, G	Owner-occupied
	E (including F	PRS
	and G if exempt	
	from MEES)	
Route 3	D, E, F, G	Owner-occupied
	D, E (including F	PRS
	and G if exempt	
	from MEES)	
Route 4	N/A*	<u>, </u>

^{*}Route 4 has been removed for GBIS

^{*}PRS = Private Rented Sector

^{*}MEES = Minimum Level of Energy Efficiency Standard

5. Statement of Intent (SoI)

- 5.1. A Statement of Intent (SoI), as set out in the ECO4 Order³⁴ and the ECO4A Order³⁵, is intended to state publicly the criteria that either a LA, a group of LAs, or a DA, intends to use to identify households that meet the eligibility criteria under flexible eligibility.
- 5.2. We have published a combined Statement of Intent (SoI) template on our website for ECO4 and the Great British Insulation Scheme³⁶. The template has been simplified to remove reference to SAP band eligibility, as SAP bands should be checked by the supplier / installer, not the LA. The SoI template has been combined to create consistency across the two schemes and avoid unnecessary complexity in the administration process.
- 5.3. The SoI template includes all routes and covers both schemes. LAs / DAs should use the tick boxes provided on the SoI to publicise which eligibility routes / proxies they wish to opt in to administer, but cannot remove routes / proxies from the SoI template. This is to make the administration of SoIs simpler and smoother. Any further information a LA / DA wishes to add to highlight routes / proxies not being used should be included on an accompanying website. LAs / DAs wishing to use route 2 proxy 5 must add further information to the SoI in order to describe the scheme relied upon for that proxy.
- 5.4. A LA or DA must publish a SoI before it can make declarations that households meet the eligibility criteria. The LAs / DAs most recent version of the SoI should be used when making declarations, and it should not reference schemes other than ECO4 Flex and Great British Insulation Scheme Flex.
- 5.5. Where a LA / DA has already published a SoI for ECO4 Flex, and they do not wish to participate in Great British Insulation Scheme Flex, they will not need to publish a new SoI. Likewise, Ofgem may publish updated SoI templates from time to time with relatively minor changes. We do not expect LAs to publish a new SoI on their website

³⁴ https://www.legislation.gov.uk/uksi/2022/875/made

³⁵ The Electricity and Gas (Energy Company Obligation) Order 2023 (legislation.gov.uk)

³⁶ Great British Insulation Scheme | Ofgem

when we publish an updated SoI template. Instead, LAs who are amending existing SoIs should use the most up to date template

- 5.6. The SoI is intended to create transparency and public accountability for the eligibility criteria and will advertise the LA's participation to their residents, energy suppliers, charities and community groups, who may be able to work with them. The SoI should be uploaded on the LA's individual website and should only reflect the ECO4 and / or Great British Insulation Scheme criteria to reduce the risks of confusion or rejection.
- 5.7. The SoI will state the LA / DA's intent to participate in ECO4 and Great British Insulation Scheme Flex and a commitment that a LA officer will check and verify that declarations have been issued for households which match the criteria in the SoI.
- 5.8. The SoI must be signed by the CEO or equivalent dedicated responsible person. A wet signature on the published version is not a legal requirement. However, we would strongly urge LAs to provide either a wet or electronic signature, or as a minimum a printed name and date, along with contact details of the best person to contact regarding their SoI. Signatures cannot be auto populated or duplicated.
- 5.9. If we find key aspects of the SoI were incorrect, not published at all or was published after a declaration was made, we will look to refuse or revoke approval of the measures included in the relevant declarations.
- 5.10. The SoI template includes fields for the following information:
 - a) Name of the LA,
 - b) Whether the LA is acting on behalf of another LA (if relevant),
 - c) Date of publication,
 - d) Version number,
 - e) A statement to outline that the LA accepts that declared households must adhere to at least one of the available 4 routes across both ECO4 Flex and Great British Insulation Scheme Flex Where LAs use the LA-run scheme proxy (listed as proxy 5 above), the name and the description of the scheme must be stated in the SoI. The description will need to include which cohort of people the LA-run scheme is

helping, and how they have identified the householder or person as low-income and vulnerable for the purposes of NICE Guideline. An LA officer will be responsible for checking and verifying declarations and associated evidence submitted.

- f) A signature (or co-signature) from the CEO or dedicated responsible person to confirm the above.
- 5.11. Where a LA needs to edit the SoI during the schemes, they should use version numbers to ensure it is clear to Ofgem and suppliers which version should be used. Previous versions of the SoI should remain publicly available but clearly marked as 'superseded' / 'withdrawn' and include the date in which the document was withdrawn.

Delegation between LAs and joint SoIs

- 5.12. A LA can delegate to another LA to provide declarations for households in its administrative area. This needs to be stated in the SoI of the LA to which it has been delegated.
- 5.13. Where a LA has delegated another LA to deliver declarations on their behalf, we suggest the delegating LA also publishes the relevant SoI on its website, so that residents are aware.
- 5.14. LAs should have regard to the requirements of the UK General Data Protection Regulation³⁷ (UK GDPR) and the Data Protection Act 2018³⁸, when sharing data between parties. Ofgem administers ECO4 and Great British Insulation Scheme Flex, but we have no remit in approving any data-sharing agreements between local authorities and obligated suppliers or installers and are not responsible for the data handling between them.

³⁷ https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation

³⁸ Data Protection Act 2018 (legislation.gov.uk)

6. Declarations

Local Authority / Devolved Administration Declaration

- 6.1. LAs and DAs are also required to produce dated declarations for all households that they refer for the scheme to the supplier or installer. Whilst Ofgem does not require a signature on the declaration, suppliers may still require one for their own auditing and administrative processes, and LAs should work with suppliers to ensure all of their requirements are met. The declaration should be dated with the date on which the LA / DA confirms that the householder is eligible under one of the referral routes. Authorities can only issue declarations once they have published a SoI.
- 6.2. A declaration confirms that the authority has verified that a property meets the eligibility criteria of one of the four referral routes, and they have collected evidence to demonstrate this. Multiple households can be included on a single declaration provided each household has their own URN.
- 6.3. For administration ease, we have created a declaration template³⁹ LAs / DAs can submit to suppliers, or LAs / DAs can create their own declaration template.
- 6.4. The declaration template has been combined for ECO4 and Great British Insulation Scheme Flex, to create consistency across both schemes. The LA / DA will not need to indicate on the declaration which of the schemes they are referring the household(s) under. They should indicate on the declaration whether they have published an SoI for ECO4 Flex only, or a combined SoI for both schemes (in this case please tick both the ECO4 and the Great British Insulation Scheme options). For referral routes one to three, the declaration will be valid for either scheme (if the LA / DA is participating in both). It will be the responsibility of the supplier / installer to determine which scheme is most suitable for the household, and what measure(s) might be appropriate to install. Referral route 4 is applicable to ECO4 Flex only.
- 6.5. An LA can provide declarations for households not within its administrative area when they have been given delegated authority from another LA. This should be made clear on the declaration, as stated from paragraph 5.13.

³⁹ https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme

- 6.6. The declaration process is the same for all LAs / DAs across England, Wales and Scotland.
- 6.7. Prior to issuing a declaration the LA / DA must ensure a SoI has been uploaded onto the authority's website, at the same time or before the declaration has been dated and issued.
- 6.8. Suppliers are able to work with LAs to identify households that meet the relevant criteria. Where suppliers are working with a LA, that LA must outline that they are using supplier debt data under Route 2, and date and issue the declaration by following the declaration process below.
- 6.9. Table **6** below provides two examples of evidence related to suppliers:

Table 6: LA and Supplier Flex evidence examples

LA Flex Example 1: LA and supplier collected evidence				
LA A non-pre-payment meter household has beer		LA issued declaration		
	in debt for 100 days and is repaying their fuel			
	debt through 3rd party deductions.			
	A member of the household has been referred			
	by a LA under a scheme established by the LA			
	to support households containing people who			
	would be considered vulnerable to the cold for			
	the purposes of NICE Guidelines.			
Supplier Flex Example 2: evidence collection from suppliers				
Supplier	A pre-payment meter household has been self-	Supplier evidence this		
	disconnected from its provider for six weeks.	referral via their measure		
	This household also receives Council Tax	notification		
	reductions based on low-income.			

Declaration notification template

- 6.10. We have set up a process to receive declaration notifications from LAs / DAs. Ofgem will use LA / DA's notification templates via a CSV file⁴⁰ to check against supplier measure notifications. Please note that the declaration itself should be sent to the supplier / installer, but the declaration notification is sent to Ofgem by the LA / DA. The ECO4 and Great British Insulation Scheme Flex Data Dictionary⁴¹ provides a description of all the fields and general information to help LAs / DAs complete the declaration notification for ECO4 and / or Great British Insulation Scheme Flex.
- 6.11. We have provided a combined declaration notification template for ECO4 and Great British Insulation Scheme Flex on our website⁴², which must be used for declaration notifications. The LA / DA do not need to indicate on the declaration notification which of the schemes they are referring the household under. It will be the responsibility of the supplier / installer to determine which scheme is most suitable for the household, and what measure(s) might be appropriate to install. For referral route 4, the LA / DA must be participating in ECO4 Flex, as this route is applicable to ECO4 only.
- 6.12. The declaration notification template includes the following fields:
 - LA Declaration Unique Reference Number (URN),
 - Referral made outside of LA remit (if appropriate),
 - Referral Route:

Route 1, Low-Income households,

Route 2, Proxy Targeting- including supplier debt data,

Route 3, NHS Referral, or

⁴⁰ https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme

⁴¹ https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme

⁴² https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme

Route 4 (applicable to ECO4 Flex only), Bespoke Targeting (Department for Energy Security and Net Zero Panel),

- Route 2 proxies or Route 3 umbrella conditions (ie one of the four eligible medical conditions for Route 3) (only mandatory if referral routes 2 or 3 are used),
- Additional Route 2 proxies
- Route 4 Application number (applicable to ECO4 Flex only),
- Address Line 1,
- Address Line 2,
- Postcode,
- LA area code⁴³ ⁴⁴,
- Confirmation that the LA or DA has been consulted by the supplier or installer about the carrying out of measures in the premises before the day on which the ECO4 or Great British Insulation Scheme measure is completed,
- Date of householder eligibility (the date the LA assessed and declared the household eligible),
- Statement of Intent publication date,

⁴³ See Tab 3.4 of the 'Headline HEE release tables' for LA area codes https://www.gov.uk/government/collections/household-energy-efficiency-national-statistics

⁴⁴ A local authority can provide declaration notifications for households not within its administrative area under certain circumstances. For example, this includes where a LA delegates some functions to another LA, where the LA providing the service is best placed to make a determination of the eligibility of a household. In such situations all relevant LAs must co-sign the SoI to confirm which LAs are operating on behalf of others. This must also be recorded on the LA declaration notification.

- Statement of Intent link.
- Confirmation whether LA / DA has published Statement of Intent for ECO4
 Flex only, or combined Statement of Intent for ECO4 and Great British
 Insulation Scheme Flex.
- 6.13. The CSV declaration notification template can be found on our website. The LA / DA will need to fill out each of the fields by manually adding data or by clicking on the drop-down boxes, no signature is required here.
- 6.14. Because suppliers, installers and LAs / DAs are free to and encouraged to establish their own working relationships, it is up to the LA / DA to decide how they wish to communicate with the supply-chain and inform them that the declaration notification has been sent to Ofgem.

Unique Reference Number (URN)

- 6.15. Each declaration must include a unique reference number (URN). This URN should be in the same format for both ECO4 and Great British Insulation Scheme Flex, and must be unique to each property identified by the LA or DA. These URNs will be used by Ofgem to carry out checks against supplier measure and project notifications for each household.
- 6.16. The URN must follow the format below:

ANNNNNNN-NNNNN

6.17. The 'ANNNNNNN' should identify the LA making the declaration. Each LA has a 9-digit Office for National Statistics (ONS) code. For example, the ONS code for Liverpool is E08000012. These ONS codes are available online and an amalgamated list of area codes can be found in the Department for Energy Security and Net Zero's Household Energy Efficiency National Statistics tables⁴⁵.

⁴⁵ See Tab 3.4 of the 'Headline HEE release tables' for LA area codes https://www.gov.uk/government/collections/household-energy-efficiency-national-statistics

- 6.18. The second section of the URN, 'NNNNN', should represent the number of the declaration in the order it has been made. For example, the first declaration can be 00001. There cannot be multiple declarations from the same LA with the same number; each household will need a unique number.
- 6.19. Where a LA has delegated to another LA the ability to issue declarations on their behalf in their administrative area, the ONS code should represent the LA making the declaration, not the original delegating LA.
- 6.20. After the declaration notification has been processed and confirmed as following the accepted formats by Ofgem and measures have been installed, the supplier must produce a notification to Ofgem that lists the declaration URN and the route used. This notification will be used for checking and auditing purposes.

Interim declaration notification process (submissions via email)

- 6.21. For the beginning of the ECO4 and Great British Insulation Scheme Flex, authorities will be expected to provide Ofgem with their declaration notification via email: <u>ECO4Flex@ofgem.gov.uk</u>. The guidance will be updated once the register for use by LAs becomes available, and we will communicate this to LAs in newsletters / workshops. Once built, the LA should send their declaration notification to Ofgem on the register, and the matching process to energy supplier measure notifications will be automated.
- 6.22. Through email, authorities will be able to provide their declaration notifications by using the ECO4 and Great British Insulation Scheme Flex CSV spreadsheet that is published on our website. Ofgem will subsequently review the notification and respond to the LA of its approved outcome. Ofgem do not share the declaration notification from the LAs with suppliers.
- 6.23. Supplier notifications that do not reconcile with the LA declaration notification will produce a mismatch error report. In this case, Ofgem will notify the supplier of the report and will allow the supplier to remediate the error and renotify Ofgem of the measures at a later stage. If there are any measures that cannot be confirmed against a declaration notification that has been issued by a LA / DA, Ofgem will reject the measure.

6.24. If a mismatch error report is issued to the supplier, the supplier will be advised to resolve the error with the appropriate LA or DA. The flowchart in <u>Appendix 1</u> illustrates the ECO4 and Great British Insulation Scheme Flex Process as described in section 5.1 - 6.22 of this guidance.

Timings

- 6.25. A declaration can only be issued once a valid SoI has been published on the LA / DA website. A LA must not make a declaration until it has made a determination that each property included in a declaration is verified to meet the householder eligibility criteria.
- 6.26. The declaration must be issued within the 12-month period ending with the day immediately preceding the day on which the measure is complete. The declaration must meet the ECO4 and Great British Insulation Scheme criteria.
- 6.27. LAs can submit declarations to suppliers / installers at the same time or after they submit declaration notifications to Ofgem. Ofgem will then use these notifications as part of measure processing for households referred through ECO4 and Great British Insulation Scheme Flex by comparing them to supplier measure or project notifications that are using the LA declaration eligibility route. Declaration notifications must be sent to Ofgem before measures are completed, although they do not need to be processed by that date.

7. Audits

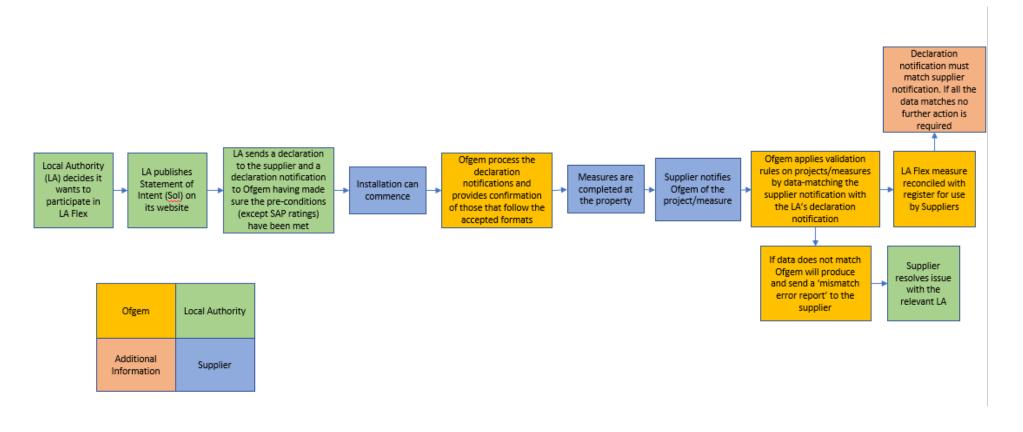
- 7.1. Suppliers will be expected to be able to provide sufficient evidence for all LA Flex measures to ensure that they meet the eligibility and compliance requirements of the schemes.
- 7.2. Ofgem will send suppliers an annual sample of measures that they have notified throughout the duration of the year and request that suppliers carry out internal checks on them to ensure that they have complied with the scheme's requirements.
- 7.3. If the supplier's evidence is insufficient or incorrect, they will need to engage with the LA or installer to review their data.
- 7.4. Once the supplier has carried out its internal checks, they will be expected to present the evidence to Ofgem through a compliance report. This should also detail the checks conducted.
- 7.5. Where the evidence was found to be insufficient or incorrect, the supplier must explain in detail the reasons for the error. If Ofgem find the case provided by the supplier to be unsatisfactory, then the measure may be rejected.
- 7.6. Ofgem will publish their own report to summarise the overall findings of the audit. This report will assess the reasons for non-compliance and further auditing may be carried out where necessary. The report will be published on our Ofgem website.
- 7.7. Where Ofgem identify that LAs have not carried out adequate due diligence checks, we will include this in the report. Ofgem would expect suppliers to consider results from the report when delivering LA Flex measures for the following year.

Devolved Administration checking process

7.8. Where Scottish and Welsh governments submit SoIs and declarations on behalf of LAs within their remits, they will be expected to carry out their own checks on LAs to ensure that they have complied with Ofgem's guidance. Whilst they will be responsible for their own LA remits in this situation, Ofgem will still monitor Scottish and Welsh declarations.

7.9. If Scottish and Welsh governments do not submit a SoI and declaration on behalf of LAs within their remit, or a LA within a devolved remit refers households for Flex independently from their DA, Ofgem will audit the LAs following the process above.

Appendix 1: Great British Insulation Scheme and ECO4 Flex process for Local Authorities (LAs)



8. Appendix 2: Summary of key changes between ECO4 Guidance for Local Authorities V1.2 and Draft Great British Insulation Scheme and ECO4 Local Authority Administration Guidance

	Previous ECO4 Guidance for	Draft Great British Insulation Scheme and ECO4 Authority Administration Guidance
	Local Authorities V1.2	
Scope of	LA / DA administration for ECO4	LA / DA administration for both ECO4 Flex and new Great British Insulation Scheme Flex.
document	Flex only	
SAP bands		Clarification added to confirm that LAs / DAs are not responsible for checking SAP bands, as
		these are checked by the supplier / installer (see Table 1 and paragraph 4.6).
		There are some differences in the SAP band requirements between ECO4 Flex and Great
		British (see 4.19)
Statement of		We have published a new combined Statement of Intent template. The template has been
Intent		simplified to remove reference to SAP band eligibility. LAs / DAs who wish to participate in
		Great British Insulation Scheme Flex should republish their Statement of Intent using the new
		template (see Chapter 5)
Declarations	Wet or electronic signature	Ofgem no longer requires a signature on the declaration, however suppliers may still require
	required on LA / DA declarations	one for their own auditing and administrative processes (see 61)
	to suppliers	The declaration template has been combined for both schemes. LAs / DAs do not need to
		indicate on the declaration which scheme they are referring the household under (as this will
		be determined by the supplier / installer). They should indicate on the declaration whether
		they have published an SoI for ECO4 Flex only, or a combined SoI for both schemes (see
		Chapter 6: Declarations).
Declaration		The declaration notification that the LAs / DAs send to Ofgem has been combined for both
Notification		schemes. LAs / DAs do not need to indicate on the declaration notification which of the

Route 2, proxy 7	Previous guidance stated that proxies 6 & 7 cannot be used in combination with each other.	schemes they are referring the household under (as this will be decided by the supplier / installer). A new field has been added for the LA / DA to indicate whether they have published an SoI for ECO4 Flex only, or for both schemes (see Chapter 6, paragraph 6.10-6.14) This has been updated to clarify that proxy 7 cannot be used in combination with proxy 6 or proxy 5 (see Table 2).
Evidence requirements		The following clarifications have been added to the examples of suitable evidence for the referral routes (see Table 4): Route 1: Bank statements / payslips provided as evidence can be from within the last 4 months prior to when the LA dates and issues the declaration. These should cover a consecutive 3-month period within this timeframe. Bank statements should show credit payments received, and householder name and address. Other information can be redacted, provided it is clear that there has been no redaction of payments received. In cases where vulnerable customers are struggling to provide sufficient evidence, this can be dealt with on a case-by-case basis. Route 3 and Route 2, proxy 3: Where patients are unable to receive a health care professional referral letter via email, a physical letter can be used. This should be on headed paper and authenticated by the GP surgery practice stamp.