

Great British Insulation Scheme (Energy Company Obligation) Delivery Guidance V1.0

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This guidance sets out Ofgem's procedures for administering the Great British Insulation Scheme, which is a new scheme established by the Electricity and Gas (Energy Company Obligation) Order 2023 (referred to in this guidance as the 'ECO4A Order'). The Great British Insulation Scheme (previously referred to by government as ECO+) places a legal obligation on energy suppliers to deliver energy efficiency measures to domestic premises. Each supplier has an obligation target based on its share of the domestic energy market in Great Britain.

The ECO4A Order was made on 24 July 2023, and parts 1 to 9 of the legislation relating to the Great British Insulation Scheme came into force the following day on 25 July 2023.

Guidance on the Great British Insulation Scheme is provided in the following documents: Great British Insulation Scheme Delivery Guidance, Great British Insulation Scheme Supplier Administration Guidance, Great British Insulation Scheme and ECO4 Guidance for Local Authority Administration and ECO4 Guidance: New Measures and Products. ECO4 The Great British Insulation Scheme Delivery Guidance is aimed at suppliers and the broader supply chain, describing how to deliver measures that are eligible to count towards the Scheme target. It details how a supplier achieves its obligation and which measures are eligible under the Scheme, as well as the criteria that must be met for each measure. Information on how scheme savings are determined, how to notify completed measures and the monitoring process is also included.

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About this Guidance

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 measures to domestic premises. It focuses on low-income and vulnerable and fuel-poor consumer groups through the installation of insulation and heating measures. ECO aims are as follows:

- a) help alleviate fuel poverty and accelerate progress to meet fuel poverty targets
- b) contribute to carbon reduction targets in the domestic sector
- c) reduce the costs of meeting the UK's renewable energy target through promoting more efficient energy use, and
- d) encourage innovation in the industry

An obligation has been outlined under the Electricity and Gas (Energy Company Obligation) Order 2023 (referred to in this guidance as the 'ECO4A Order'). This new scheme will run alongside ECO4 during this period and is called the Great British Insulation Scheme. 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. The Great British Insulation Scheme which will run from 25 July 2023 (the date of commencement of the relevant parts of the ECO4A Order) until 31 March 2026, is an addition to the current ECO scheme to deliver rapid installation of energy efficiency measures to a wider pool of households in the least efficient homes, including those on the lowest incomes and those in lower Council Tax band homes.

Ofgem (the Office of Gas and Electricity Markets) will be administrator of the Great British Insulation Scheme. This document provides guidance on how Ofgem ('we', 'our' and 'us' in this document) will administer the Scheme, in line with the requirements of the ECO4A Order.¹ **This guidance applies to all measures installed under the Great British Insulation Scheme from 30 March 2023.**

¹ [The Electricity and Gas \(Energy and Company Obligation\) Order 2023:](https://www.legislation.gov.uk/ukxi/2023/873/pdfs/ukxi_20230873_en.pdf)
https://www.legislation.gov.uk/ukxi/2023/873/pdfs/ukxi_20230873_en.pdf

Under the Scheme, energy suppliers must achieve a total of £55,998.000² in notional annual bill savings over the three years of the Scheme. The target is divided between suppliers based on each supplier's relative share of the domestic gas and electricity market.

This target must be achieved no later than 31 March 2026.

To help users of our guidance, we have split it into four parts:

- a) **Great British Insulation Scheme Delivery Guidance** – aimed at suppliers and the broader supply-chain, describing how to deliver measures that are eligible to contribute towards meeting the Great British Insulation Scheme targets.
- b) **Great British Insulation Scheme Supplier Administration Guidance**³ – aimed mainly at suppliers, describing the processes that suppliers and Ofgem follow to meet the requirements of the ECO4A Order.
- c) **Great British Insulation Scheme and ECO4 Guidance for Local Authority Administration**⁴ – aimed at Local Authorities and Devolved Administrations describing how to identify and refer households for the Great British Insulation Scheme Flex scheme, publish Statements of Intent and submit Declarations.
- d) **ECO4 Guidance: New Measures and Products**⁵ – aimed at suppliers and the broader supply chain, describing how to apply for and deliver standard alternative methodologies, data-light measures, and Innovation Measures. The Great British Insulation Scheme includes eligible Innovation Measures from within ECO4.

This document (Great British Insulation Scheme Guidance: Delivery) addresses the following:

- a) How a supplier achieves its obligation
- b) Specific requirements relating to eligibility of households

² As set out in the Great British Insulation Scheme consultation stage Impact Assessment. The actual total and annual targets will be confirmed through the final impact assessment when published, and as set out in the regulations to be laid shortly in Parliament.

³ <https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-supplier-administration-guidance>

⁴ <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-local-authority-administration-guidance>

⁵ <https://www.ofgem.gov.uk/publications/draft-energy-company-obligation-eco4-guidance-new-measures-and-products-nmap-v01>

- c) Measures eligible under the Great British Insulation Scheme and the criteria that must be met
- d) How Great British Insulation Scheme savings are determined, including information on scoring
- e) How measures are notified and the information we require
- f) The quality assurance that suppliers must meet
- g) Our expectation of suppliers in relation to audit and counter-fraud activity
- h) Supporting information contained in appendices.

It is the responsibility of each supplier and relevant stakeholder to understand the provisions of the ECO4A Order and how those provisions apply to it. The document is for guidance only and is not intended to be a legal guide. Suppliers, local authorities and members of the supply chain should seek their own legal and technical advice in relation to their obligations under the ECO4A Order. A supplier is responsible for ensuring that it, and any member of the supply-chain acting on its behalf, complies with the applicable legal requirements and industry standards.

This document does not anticipate every scenario which may arise. If a scenario arises which is not addressed in this guidance, we will adopt an approach consistent with the relevant legislation. Any additional guidance we publish will be available on our website.

[The Electricity and Gas \(Energy Company Obligation\) Order 2023 \(legislation.gov.uk\)](https://legislation.gov.uk)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1148327/design_of_the_energy_company_obligation_2023-2026_-_qb_insulation_scheme_-_government_response.pdf

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

<https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-supplier-administration-guidance>

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

<https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-amendment-administration-consultation-decision>

<https://www.ofgem.gov.uk/publications/energy-company-obligation-2022-26-eco4-guidance-new-measures-and-products>

1. Introduction

- 1.1 A new obligation period has been established under the ECO4A Order⁶, and the Scheme that runs during this period is called 'the Great British Insulation Scheme – often in this document abbreviated to 'the Scheme'. The overall obligation period for the Scheme runs from 25 July 2023, (the commencement date of the ECO4A Order) to 31 March 2026 and is split into three phases. Ofgem will administer the Scheme in line with the requirements of the ECO4A Order.
- 1.2 The Great British Insulation Scheme broadens the eligibility pool from ECO4 by including two eligibility groups. The first group is the low-income group which mirrors the eligibility criteria for the Help to Heat Group (HTHG) under ECO4, focusing on SAP rated properties D, E, F and G with low-income and vulnerable households. 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 a SAP rating of D, E, F and G.
- 1.3 The target for notional annual bill savings for obligated suppliers as set out in the ECO4A Order is £55,998,000, which is to be achieved by 31 March 2026. This is split into three phases:
 - a) **Phase A** – 25 July 2023, commencement date of parts 1 to 9 of the ECO4A Order – 31 March 2024: £7,280,0009 (Great British Insulation Scheme measures have been permitted on a voluntary basis from 30 March to 24 July, known as the early delivery period.
 - b) **Phase B** - 1 April 2024 – 31 March 2025: £24,359,000
 - c) **Phase C** - 1 April 2025 – 31 March 2026: £24,359,000
- 1.4 Previous ECO schemes have required full compliance with the supplier's target by final determination, whereas the Great British Insulation Scheme requires compliance on an annual basis. A supplier achieves its obligations by promoting qualifying actions ('measures') at domestic premises.
- 1.5 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.

⁶ <https://www.legislation.gov.uk/ukdsi/2023/9780348248340/contents>

The Great British Insulation Scheme Guidance

- 1.6 This guidance details our administrative processes for the Great British Insulation Scheme and sets out the requirements for all obligated suppliers in accordance with the ECO4A Order. Where a supplier fails to meet the requirements of the ECO4A Order, we may take enforcement action.
- 1.7 We consider that there is a hierarchy of documents that we follow to support our administrative approach:
- a) All existing wider legislation including the ECO4A Order
 - b) Ofgem guidance and any guidance produced by the Department for Energy Security and Net Zero
 - c) Any requirements of specifications referred to in legislation, eg Publicly Available Specification (PAS), Heat Trust requirements, TrustMark, Building Regulations, etc.
 - d) Other specifications and guidance not directly specified in legislation.

Information gathering powers

- 1.8 We use our information gathering powers under the ECO4A Order to require suppliers to provide us with information. We may require a supplier to:
- a) Provide specific information about its proposals for complying with any requirement under the ECO4A Order;
 - b) Produce specific evidence to demonstrate that it is complying with, or that it has complied with any requirement under the ECO4A Order; and
 - c) Provide information relating to the cost to the supplier of achieving its obligations.

Personal Data

- 1.9 Ofgem will process all personal data collected in accordance with the retained EU law version of the General Data Protection Regulation 2016/679 (UK GDPR) and the Data Protection Act 2018. Ofgem uses the personal data collected to perform its statutory functions and may share this information with other organisations in line with Ofgem's

scheme administration functions. For more information on how we process personal data on the Great British Insulation Scheme please refer to our scheme [privacy notice](#).

Queries and further information

- 1.10 For further information on our administration of the Great British Insulation Scheme, please visit our website: <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>. Any queries about our guidance or the administration of the Scheme should be directed to ECO@ofgem.gov.uk.
- 1.11 For further advice regarding energy efficiency visit the following: <https://www.simpleenergyadvice.org.uk/>.
- 1.12 For further information on TrustMark, please refer to: <https://www.trustmark.org.uk/>. Queries about the TrustMark Framework should be directed to eco@trustmark.org.uk
- 1.13 Please direct any queries about the ECO4A Order, future changes to the scheme and wider policy to the Department for Energy Security and Net Zero at gbinsulation@beis.gov.uk.

2. Obligations

Great British Insulation Scheme obligations

- 2.1 This section explains the overall Great British Insulation Scheme obligation, the obligation for each phase, when a supplier is obligated, and individual supplier obligations. It also gives an overview of the Scheme rules including eligibility and installation requirements for different Standard Assessment Procedure (SAP) band properties.
- 2.2 The overall obligation period for the Scheme runs from the commencement date of the ECO4A Order to 31 March 2026 and is split into three phases:
- **Phase A:** 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
- 2.3 We are required to determine a supplier's obligation for each of these phases.
- 2.4 Suppliers must meet at least 90% of their Phase A and Phase B targets through measures completed before the end of each phase. Over-delivery from a previous phase will contribute to Phase B and C targets as appropriate. Suppliers are also entitled to carry under the remainder of these targets to the subsequent phase. This applies to both the overall phase target and the low-income target. Each supplier must meet their total obligation by the end of the Scheme (31 March 2026).
- 2.5 A measure is considered to be complete when it has been fully installed and has been handed over. At this point it must be able to deliver savings at a level expected for that measure (see further details of 'when is an installation of a measure complete' at paragraph 7.7). In order for us to be able to recognise the measure as completed, it must also be notified to us within the required timeframes (see chapter 7 for more details relating to notifications, and 7.4 specifically in relation to the required timing of measure notifications).
- 2.6 A licence-holder is a participant in relation to a phase if the supplier or a member of a supply group:
- a) Supplies 300 gigawatt hours or more of electricity in the qualification year for that phase; and supplies electricity or gas to 150,000 or more domestic customers (dual fuel customers are counted twice) at the end of that qualification year, or

- b) Supplies 700 gigawatt hours or more of gas in the qualification year for that phase; and supplies electricity or gas to 150,000 or more domestic customers (dual fuel customers are counted twice) at the end of that qualification year, or
- c) Was a participant in relation to the preceding Great British Insulation Scheme phase.

Promotion of a qualifying action

- 2.7 A qualifying action is the installation of a measure at domestic premises that meets the eligibility criteria specified in the ECO4A Order. The act of promotion is therefore linked to the act of installing a measure that results in the reduction in the cost of heating premises to 21 degrees Celsius in the main living areas and 18 degrees Celsius in all other areas and is completed on or after 30 March 2023 and before 1 April 2026. A supplier promotes the installation of a measure if it is the cause of that measure being installed. Only one supplier may be credited with the savings arising from a measure.
- 2.8 The clearest means of promotion is if a supplier contracts an installer to carry out the installation of a measure. However, the fact that a supplier has funded all or part of the installation of a measure is sufficient to establish that the supplier was a cause of that measure being installed.
- 2.9 A supplier cannot partially or wholly fund a measure with funding from other government schemes or grants, whether from local, devolved or national government.
- 2.10 Suppliers will also be able to transfer measures until 30 June 2026. This means that the supplier 'B' notifying the measure might not be the supplier that originally promoted the measure, but these measures will be treated as promoted by supplier B and not A.
- 2.11 When transferring measures to another obligated supplier all the measures within the retrofit must be transferred, including both the primary and any secondary measures. This also applies to any associated in-fill measures.

Early Delivery

- 2.12 The Great British Insulation Scheme allowed for early delivery of measure at the supplier's own risk. In order to be eligible, early delivery will need to have been in line with the policy as set out.

- 2.13 All measures delivered on or after 30 March 2023 until 24 July 2023 will be known as early delivery measures.

3. Eligibility

Overview of Great British Insulation Scheme rules

3.1 The acronyms referred to in Table 1 are explained below:

- CWI - cavity wall insulation
- Great British Insulation Scheme Flex – flexible eligibility
- GE – general eligibility group
- IMs – innovation measures
- LI – loft insulation
- LIG – low-income group
- OO – owner-occupied
- PRS – private rented sector
- SH – social housing
- SWI - solid wall insulation

Table 1: Overview of Great British Insulation Scheme rules across eligibility, tenure, starting SAP ratings and other rules

Eligibility	Tenure	Starting SAP band	Measures	Other requirements
GE	OO	D-G	All eligible insulation measures minus heating controls	Council Tax band A-D in England or A-E in Scotland and Wales
GE	PRS	D-G in England or Wales ⁷ D-E in Scotland	All eligible insulation measures excluding CWI and LI, and no heating controls	Council Tax band A-D in England or A-E in Scotland and Wales
LIG	OO	D-G	All measures including secondary measures such as heating controls	Must be in receipt of eligible benefits
LIG	PRS	D-G in England or Wales ⁷ D-E in Scotland	All eligible insulation measures minus heating controls	Must be in receipt of eligible benefits
SH	SH	D	IMs only but not a heating control measure	Property rented at below the market rate. All eligible social housing will be treated through the low-income group rather than any being eligible through the general group

⁷ Where the pre-installation SAP band is band F or G, the information in respect of the premises must be registered on the PRS Exemptions Register [by its landlord] in accordance with regulation 36(2) of the 2015 regulations; or the premises are not a domestic PR property within the meaning of regulation 19 of the 2015 Regulations.

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Eligibility	Tenure	Starting SAP band	Measures	Other requirements
SH	SH	E-G	All eligible insulation measures minus heating controls	Property rented at below the market rate. All eligible social housing will be treated through the low-income group rather than any being eligible through the general group
Great British Insulation Scheme Flex for routes 1 and 3	OO	D-G	All measures including secondary measures such as heating controls	Requirements are route specific. Please see relevant sections for more details
Great British Insulation Scheme Flex for route 2	OO	E-G	All measures including secondary measures such as heating controls	Requirements are route specific. Please see relevant sections for more details
Great British Insulation Scheme Flex for routes 1 and 3	PRS	D-G in England or Wales ⁷ D-E in Scotland	All eligible insulation measures minus heating control measures	Requirements are route specific. Please see relevant sections for more details
Great British Insulation Scheme Flex for route 2	PRS	E-G in England or Wales ⁷ E in Scotland	All eligible insulation measures minus heating control measures	Requirements are route specific. Please see relevant sections for more details

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Eligibility	Tenure	Starting SAP band	Measures	Other requirements
In-fill (flat)	Any	Any	CWI, SWI. Applied measure must match that of the associated ECO-eligible property	For every one scheme qualifying flat one in-fill flat can be treated
Primary Great British Insulation Scheme flat for in-fill	OO	D-G	All measures, provided measures include one of CWI, SWI	Can be in either the general eligibility group or low-income group
Primary Great British Insulation Scheme flat for in-fill	SH, PRS	E-G	Any measure that would be eligible if considered in isolation including one of CWI, SWI	PRS can be in either the general eligibility group or low-income group
In-fill (house)	Any	D-G	SWI	For every three scheme qualifying houses one in-fill house can be treated
Primary Great British Insulation Scheme house for in-fill	OO	D-G	Any scheme qualifying measures for eligibility group	Can be in either the general eligibility group or low-income group
Primary Great British Insulation Scheme house for in-fill	SH, PRS	E-G	Any scheme qualifying measures for eligibility group	PRS can be in either the general eligibility group or low-income group

Eligibility groups

- 3.2 The Great British Insulation Scheme targets two eligibility groups. A low-income group similar to the Help to Heat Group in ECO4 and a new general eligibility group.

General eligibility group

- 3.3 The Scheme is designed to target a wide range of households through a general eligibility group. This group can receive measures through the Great British Insulation Scheme if they live in a home that falls within Council Tax bands A-D in England, A-E in Scotland and A-E in Wales, with a SAP rating of D and below. The Council Tax band will need to be provided when notifying measures.⁸

Low-income group and Social Housing

- 3.4 The Scheme also targets a low-income group which mirrors the eligibility criteria for the Help to Heat Group (HTHG) within ECO4. Further information on eligibility can be found from paragraph 3.126 onwards.
- 3.5 Both the general eligibility and low-income groups are then further divided into whether they are owner-occupied or privately rented, with the low-income group further including social housing eligibility. The group the household falls into will then influence which measures they are eligible for. This chapter describes the eligibility for all of these groups.

LA and Supplier Flex

- 3.6 Flexible eligibility is where Local Authorities (LAs) or Devolved Administrations (DAs) 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, and fuel poor.
- 3.7 There are various routes which LAs / DAs can use to refer eligible homes which have been stipulated within the ECO4A Order. Great British Insulation Scheme Routes 1 and 3 are for pre-installation SAP bands D-G for owner-occupied households, D-E for private rented sector households (including F and G if exempt from MEES), and Route 2 is for E-G owner-occupied households, and E private rented sector households

⁸ Further information on evidencing can be found in Appendix 2 – Premises and occupant requirements.

(including F and G if exempt from MEES). Route 4 which is applicable under ECO4, is not applicable under the Great British Insulation Scheme.

- 3.8 Supplier Flex is separate policy that does not require any evidencing from an LA. Suppliers can use their own energy debt data to refer households under Route 2.
- 3.9 Great British Insulation Scheme and ECO4 Guidance for Local Authority Administration⁹, including the mirrored eligibility requirements, is combined for the two schemes.

Low-income minimum requirement

- 3.10 There is a requirement that at least 20% of each annual target should be delivered to the low-income group. Delivery to the remaining 80% will be unconstrained giving freedom to suppliers to choose to whom they deliver; it may be delivered solely to the general eligibility group or a mix of both groups.
- 3.11 We will allow up to 80% of a supplier's low-income minimum requirement to 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% (ie up to 16 percentage points of the 20% low-income minimum requirement can be met through Flex). Outside of the 80% maximum contribution to the low-income minimum requirement, unlimited delivery to Great British Insulation Scheme Flex-eligible households is permitted. The remaining 20% of each supplier's low-income minimum must be delivered to households on means-tested benefits or living in the least efficient social housing. This is to ensure at least some support is reserved for those households.

Private domestic premises

- 3.12 This section of the Delivery Guidance explains the eligibility requirements for private domestic premises as well as those for occupants, in order for a measure to be considered eligible for the Great British Insulation Scheme.
- 3.13 Scheme measures delivered to premises occupied by a member of the low-income group or identified through the Great British Insulation Scheme Flex route must be delivered to private domestic premises. Private domestic premises are domestic premises that are not owned or let by a social landlord.¹⁰

⁹ <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-local-authority-administration-guidance>

¹⁰ For more information on the definition of a social landlord, see Schedule 2 of the ECO4 Order.

- 3.14 Whereas the private requirement (evidence is required to demonstrate that premises are private) does not apply to social housing, the domestic and premises requirements apply to all housing types, including social housing.
- 3.15 Measures can also be delivered to properties owned or let by a social landlord where the property has been let at or above market rate, subject to measure eligibility and occupant requirements. Private domestic owner-occupied premises, and private rented housing can also be treated through Great British Insulation Scheme Flex. Information on how to determine market rate can be found in Appendix 2 – Premises and occupant requirements.
- 3.16 The following section outlines the definitions and requirements for each of the aspects of private domestic premises.

The 'private' requirement

- 3.17 The Great British Insulation Scheme Supplier Data Dictionary¹¹ captures varying tenure types, including owner-occupied (OO), private rented sector (PRS) and Social Housing (SH). The evidence required to demonstrate that premises are private depends on:
- a) Whether or not a 'relevant interest' in the premises is registered,¹²
 - b) Who the premises belong to, or are let by, and
 - c) Where applicable, the financial rate at which the premises are let (ie rent).
- 3.18 The 'relevant interest' is the legal interest granting the current right to occupy those premises and helps to identify the tenure. In England and Wales, the relevant interest may belong to a freeholder, leaseholder, or sub-leaseholder. In Scotland, the relevant interest may belong to the person holding the owner's interest or right, or the person holding the tenant's or sub-tenant's interest.

¹¹ <https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-supplier-data-dictionary>

¹² A registered premises is one with a relevant interest registered on the Land Registry in England and Wales or, in Scotland, the Land Register of Scotland or recorded in the Register of Sasines. For more information on the evidencing routes for registered and unregistered premises refer to Appendix 2 – Premises and occupant requirements.

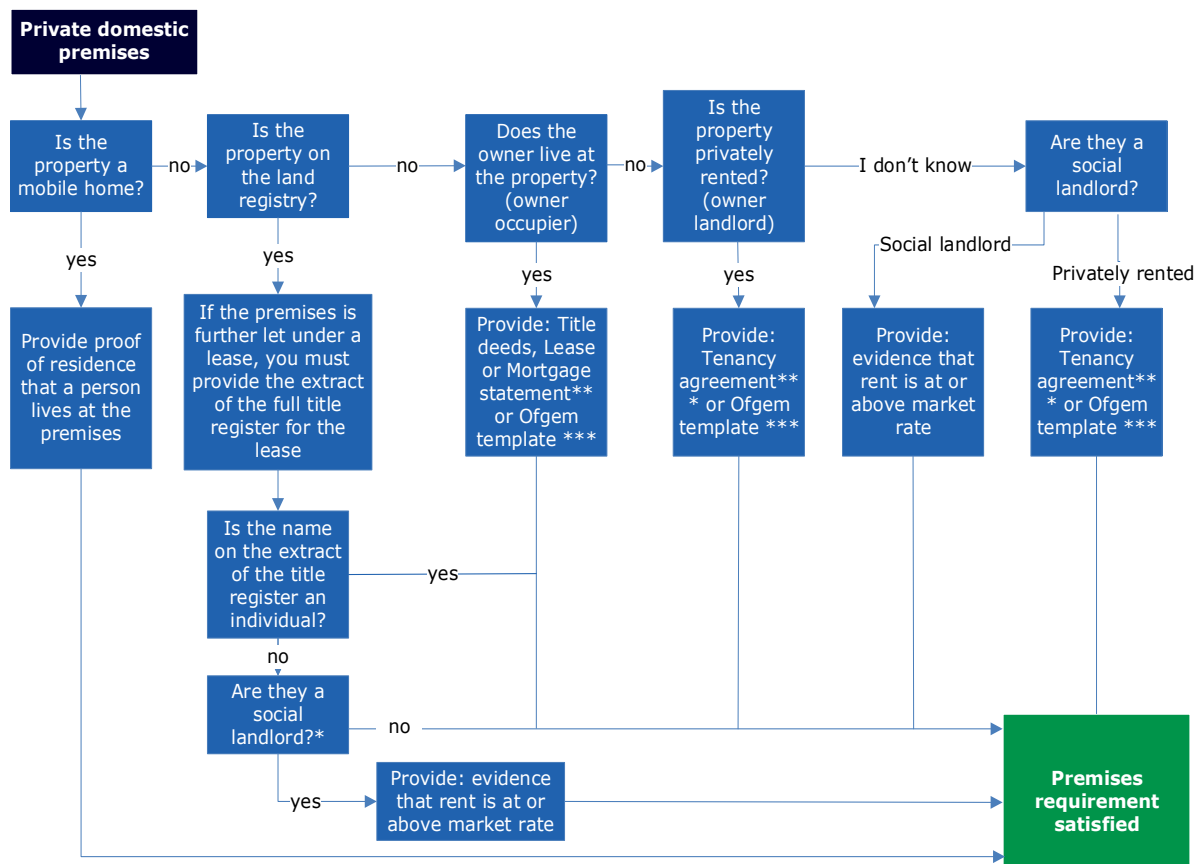
- 3.19 Where premises are subject to a shared ownership arrangement between a private individual and a social landlord, we consider the premises to be private domestic premises given a private individual is one of the owners of the premises.
- 3.20 Where a customer has entered into an agreement with a bank where the bank buys the property and sells it back to the customer over a period of time, (for example, due to the customer's religious beliefs) the following will need to be considered when determining whether the property is owner occupied:
- a) The terms of the customer's agreement with that bank, and
 - b) Who has the registered interest in the property.¹³
- 3.21 Properties that have a Lifetime Mortgage through an Equity Release scheme are treated in the same way as a standard mortgage.¹⁴ The premises should be categorised as owner-occupied, as full ownership is retained by the occupier, subject to the plan provider holding a charge over the property. This is the same as a standard mortgage.
- 3.22 Where the Equity Release Scheme for the property is a Home Reversion Plan, properties will be considered on a case-by-case basis to determine if they are owner-occupied or private rented sector.
- 3.23 A property occupied by the way of liferent meets the definition of 'owner-occupied premises' in the ECO4 Order.¹⁵ If the title deeds confirm that the property is under liferent, and the property has not subsequently been let out to someone else, it would be considered as owner-occupied for the purposes of the Great British Insulation Scheme.
- 3.24 Evidence demonstrating who the premises belong to, or are let by, must relate to the person to whom the relevant interest belongs.
- 3.25 Figure 1 shows how to identify private domestic premises, and some of the documents needed to prove the premises requirement. The Ofgem template can be found on the Great British Insulation Scheme Great British Insulation Scheme Eligibility and Premises Declaration.

¹³ See Appendix 2 – Premises and occupant requirements for information on the documentation needed in these circumstances.

¹⁴ An Equity Release scheme is where the equity in the property is either extracted in a single lump or in instalments and repaid when the occupier either dies or moves to permanent long-term care.

¹⁵ A liferent is a feature of Scottish property law. It allows a person who owns a heritable property to transfer the property to another person(s) and retain the right to occupy the premises.

Figure 1: Private domestic premises flowchart



* See Appendix 2 for information on how to identify a social landlord

** If dated earlier than 12 months prior to the completion of the first measure in a retrofit, must be accompanied by proof of residence dated within 12 months prior to completion of the first measure in a retrofit

*** Must be accompanied by proof of residence dated within 12 months before the completion of the first measure in the retrofit

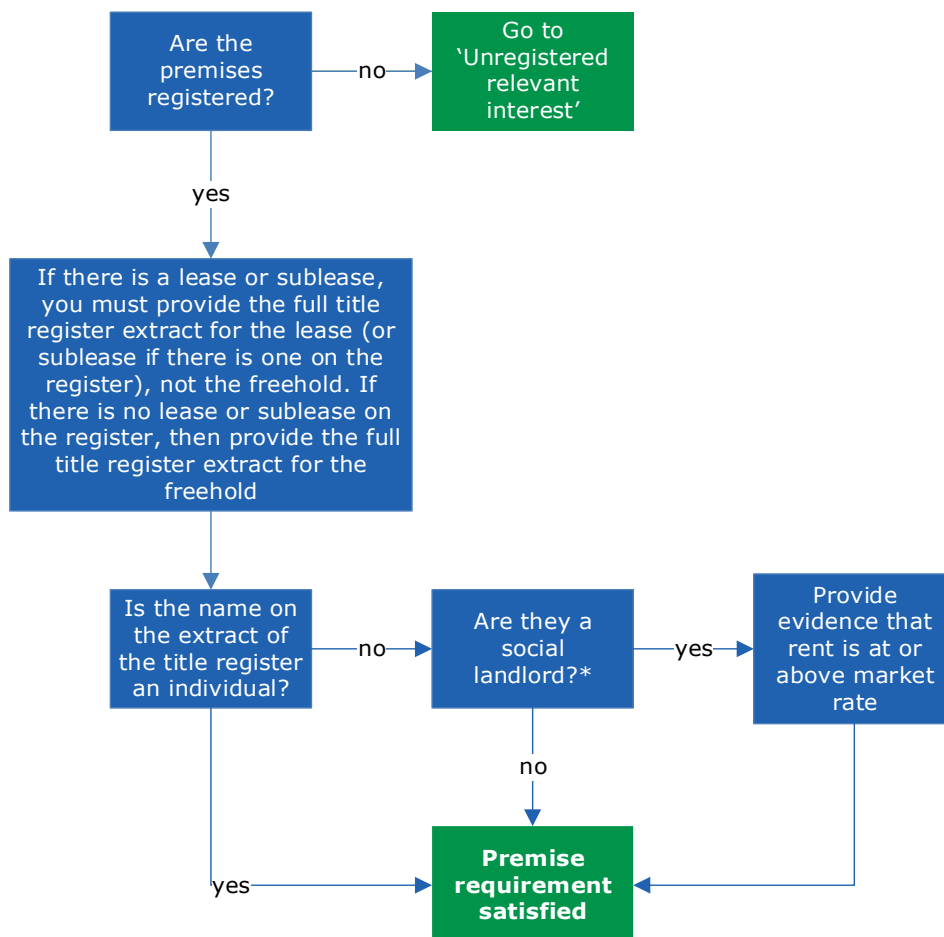
Registered relevant interest

- 3.26 In England and Wales, premises are **not** considered to be private domestic premises if the relevant interest registered on the Land Registry belongs to a social landlord, **unless** the supplier can evidence that the premises are let at or above market rate.¹⁶
- 3.27 In Scotland, premises are **not** considered to be private domestic premises if the relevant interest registered on the Land Register of Scotland or recorded in the Register of Sasines belongs to a social landlord, **unless** the supplier can evidence that the premises are let at or above market rate.

¹⁶ See Appendix 2 – Premises and occupant requirements for information on calculating the market rate.

3.28 Figure 2 shows how to meet the premises requirement for registered premises.

Figure 2: Registered premises flowchart



* See Appendix 2 for information on how to identify a social landlord

3.29 For information on how to evidence the registered relevant interest see Appendix 2 – Premises and occupant requirements.

Unregistered relevant interest

3.30 Premises for which a relevant interest is not registered will be considered private domestic premises if:

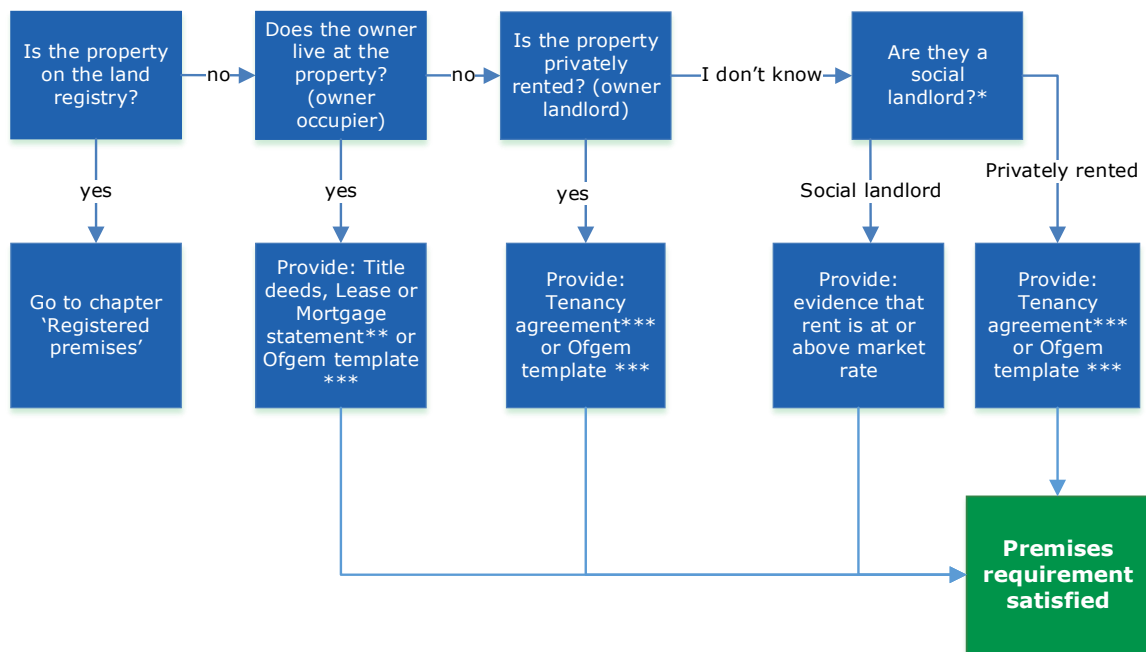
- a) The premises are not owned or let by a social landlord unless the premises are let by the social landlord at or above market rate.
- b) The premises are let under a lease granted under the 'Right to Buy' or 'Right to Acquire' schemes in England or Wales.

c) The premises are let under a lease granted under the 'Right to Purchase' scheme in Scotland.

d) The premises is a croft (see paragraphs 3.36 - 3.37 below for more information).

3.31 Figure 3 shows how to meet the premises requirement for unregistered premises. The Ofgem template can be found on the Great British Insulation Scheme Pre Retrofit Eligibility and Premises Declaration¹⁷.

Figure 3: Unregistered premises flowchart



* See Appendix 2 for information on how to identify a social landlord

** If dated earlier than 12 months prior to the completion of the first measure in a retrofit, must be accompanied by proof of residence dated within 12 months prior to completion of the first measure in a retrofit

*** Must be accompanied by proof of residence dated within 12 months before the completion of the first measure in the retrofit

3.32 For more information on how to evidence unregistered relevant interest, see Appendix 2 – Premises and occupant requirements.

Online verification service (for premises in England and Wales)

3.33 For properties in England and Wales, the Energy Saving Trust (EST) has developed a service allowing users to verify that a premises is a private domestic premises through

¹⁷ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

a data-matching process with the Land Registry. This service cannot be used to evidence tenure for social housing or local authority-owned properties.

3.34 EST will provide the following categories against these verifications:

- a) Matched
- b) Unmatched
- c) Unavailable

3.35 Where EST verifies a premises as 'matched', we consider that the premises is a private domestic premises. Where the premises are 'unmatched' or 'unavailable', alternative evidence will be required.

Crofts

3.36 A property that is a croft can be treated as an owner-occupied premises as long as appropriate evidence is provided. This should show that the property is a croft and that the person listed – who can be in either the low-income or general group - lives at the property. This can be evidenced by any of the following:

- a) Evidence of leases registered with the Crofting Commission
- b) Evidence that the premises is listed on the Register of Crofts (mandatory for all crofts)
- c) A copy of a crofting tenancy agreement.

3.37 Although it is possible to evidence the property as recorded on the Register of Sasines or providing title deeds, these documents are not usually available for crofts. If a supplier wishes to use an alternative form of evidence, they should contact us.

The 'premises' requirement

3.38 As outlined in the ECO4A Order, a supplier achieves its obligation by promoting qualifying actions in domestic premises, including mobile homes (also referred to as park homes). All Great British Insulation Scheme eligible measures must be delivered to eligible domestic premises, including those delivered via the Great British Insulation Scheme Flex, and in-fill.

- 3.39 As the Scheme relies on SAP/RdSAP (Reduced Data SAP) assessments, in order for a property to qualify as a domestic premises, it must be a dwelling that serves wholly or mainly for domestic purposes (ie is occupied as a home).¹⁸

Dwellings

- 3.40 Any domestic premises receiving Great British Insulation Scheme measures must meet the 'dwelling' definition in The Energy Performance of Buildings (England and Wales) Regulations 2012¹⁹ and The Energy Performance of Buildings (Scotland) Regulations 2008²⁰.
- 3.41 Regulation 2 of The Energy Performance of Buildings (England and Wales) Regulations 2012 defines a 'dwelling' as "a building or part of a building occupied or intended to be occupied as a separate dwelling".
- 3.42 Regulation 2 of The Energy Performance of Buildings (Scotland) Regulations 2008 defines 'dwelling' as per regulation 2 of the Building (Scotland) Regulations 2004²¹ as "a unit of residential accommodation occupied (whether or not as a sole or main residence) by an individual or by individuals living together as a family or by not more than six individuals living together as a single household (including a household where care is provided for residents), and includes any surgeries, consulting rooms, offices or other accommodation, of a floor area not exceeding in the aggregate 50 square metres, forming part of a dwelling and used by an occupant of the dwelling in a professional or business capacity".
- 3.43 We see this definition implemented through the approach used for SAP assessments, as these are the regulations that govern SAP assessments. SAP and Reduced data SAP (RdSAP) assessments can only be carried out on properties which are deemed to be 'dwellings'. A property's eligibility for a SAP assessment or EPC (Energy Performance Certificate) can be used as proof that it is a dwelling.

¹⁸ See ECO4 Order Article 2 for the definition of private domestic premises

¹⁹ <https://www.legislation.gov.uk/ukxi/2012/3118/contents/made>

²⁰ <https://www.legislation.gov.uk/ssi/2008/309/contents/made>

²¹ <https://www.legislation.gov.uk/ssi/2008/309/contents/made>

3.44 Suppliers can only deliver measures to:

- a) Pre-existing buildings erected before 1 April 2022, or
- b) Premises which were first occupied as domestic premises before the day on which the installation was completed.²²

3.45 Evidence to confirm the date of building completion can include:

- a) In England and Wales, a building control completion certificate; or
- b) In Scotland, notification from a local authority of acceptance of a completion certificate.

3.46 Where neither of these documents are available, suppliers should contact us to discuss alternative documentation. A measure may not be eligible if evidence cannot be provided. Evidence to demonstrate the date of building completion must be dated prior to the evidence of the occupancy.

3.47 Where a building is subject to a change of use, such as commercial to domestic, or a single house into multiple flats, we would consider this building to be a 'new building' under this provision. If an extension is being added, see paragraph 3.59.

Confirming that premises are not new build premises

3.48 Where a building is pre-existing before 1 April 2022 the Great British Insulation Scheme Eligibility and Premises Declaration should be completed and signed to confirm that the building was pre-existing before 1 April 2022. The supplier should make this document available on request.

3.49 Where the Great British Insulation Scheme Pre Retrofit Eligibility and Premises Declaration is not completed and signed to identify that the premises are pre-existing, evidence of occupancy (see paragraph 3.57) or other evidence that the building is pre-existing must be available.

3.50 Where there is uncertainty about the age of a premises, a building that was erected before 1 April 2022 may be identified by reference to any of the following documents:

²² See ECO4A Order Article 11(e)(ii)

- a) Documentation that meets the occupancy requirements (listed in paragraph 3.57)
- b) In England and Wales, a Land Registry search, where a title has been registered prior to 1 April 2022
- c) In Scotland, a search of the Land Register of Scotland or Register of Sasines
- d) A Certificate of Title or Deeds dated prior to 1 April 2022
- e) A date prior to 1 April 2022 on an EPC
- f) In England and Wales, a building control completion certificate, or
- g) In Scotland, notification from a local authority of acceptance of a completion certificate.

3.51 Where none of these documents are available, suppliers should contact us to discuss alternative documentation.

3.52 We may carry out an audit to confirm that the Great British Insulation Scheme Pre Retrofit Eligibility and Premises Declaration has been completed as required. Where the declaration is not completed, we may request further evidence from suppliers to verify that a building was erected before 1 April 2022.

Evidencing requirements for delivering measures to new buildings

3.53 Where a measure is delivered to new build premises, such as buildings subject to a change of use (see section on Dwellings from paragraph 3.40) it needs to be evidenced that the premises were first occupied as domestic premises before the installation was completed.²³

3.54 For a measure delivered to the premises of a member of the low-income group evidence to demonstrate that a member of the low-income group resides in the premises will be sufficient to evidence eligibility as this demonstrates that the premises is occupied.

3.55 All social housing, Great British Insulation Scheme Flex and in-fill measures delivered to new buildings require a declaration on the Great British Insulation Scheme Pre

²³ See ECO4A Order Article 11(e)(ii)

Retrofit Eligibility and Premises Declaration to be completed and signed by the occupant.

- 3.56 Where premises were erected after 1 April 2022, a declaration from a landlord or non-resident owner must be signed on The Great British Insulation Scheme Eligibility and Pre-Premises Declaration to confirm that premises are occupied. If the declaration is signed by a landlord or a non-resident owner on behalf of the customer, additional evidence must be collected to demonstrate the date of building completion as well as current or previous occupancy.
- 3.57 Premises are considered occupied, where any of the following documentation is dated after the building completion and prior to the installation of the measure:
- a) Utility bill, landline phone bill or TV licence,
 - b) Council tax letter or letter from the council,
 - c) Mortgage statement or bank statement,
 - d) Tenancy agreement, or
 - e) Extract from the electoral register.
- 3.58 Where these documents are not available, suppliers should contact us to discuss alternative documentation. Evidence of date of completion and occupancy must be made available on request. Where there is insufficient support evidence, the measure may be ineligible.

New build extensions

- 3.59 A new build extension is an extension²⁴ completed on or after 1 April 2023.
- 3.60 A Great British Insulation Scheme measure may not be delivered to a new build extension until the works for the extension have been completed.

²⁴ An extension as referenced and defined by Building Regulations Part Lb, Fabric standards, at Section 4.1. This supports the Building and Approved inspectors (Amendment) Regulations 2010: <https://www.legislation.gov.uk/uksi/2010/719/contents/made>

- 3.61 In the case of measures installed to new build extensions, including loft conversions, suppliers will need to evidence that the construction of the extension is completed prior to the date of completed installation (DOCI) of the measure.
- 3.62 Suitable evidence that the extension was completed before the DOCI for the measure includes:
- a) In England and Wales, a building control completion certificate, or
 - b) In Scotland, a notification from a local authority of acceptance of a completion certificate.
- 3.63 Where neither of these documents are available, suppliers should contact us to discuss alternative documentation.
- 3.64 This evidence must be made available on request. Where no documentation is available, the measure may be ineligible.

The 'domestic' requirement

Occupancy

- 3.65 In addition to qualifying as a dwelling, for a property to be deemed a domestic premises, it must be occupied primarily as a home by its residents.
- 3.66 This part of the test considers the way in which the building is generally used. In most cases it should be clear that premises are being used as a home, ie the premises are used by the occupants for living in on more than a short-term basis (more than three months). Suppliers are expected to check the length of a lease or licence to occupy in scenarios where one would expect the lease or licence to be short-term.
- 3.67 The use of premises as a home can be evidenced in the following ways:
- a) *Owner-occupied premises:* the receipt by the occupant of utility bills or mortgage statements relating to the premises may indicate that the premises are used as a home. There may be other indicators such as mortgage deeds naming the occupant.
 - b) *Premises occupied under a lease or licence to occupy:* the receipt by the occupant of at least three months of utility bills relating to the premises, or the existence of

a lease or licence of longer than three months in the name of the occupant (such as a tenancy agreement) may indicate that the premises are used as a home. There may be other indicators that could be considered acceptable evidence. Please contact us if you are unsure.

Commercial activities

- 3.68 Occupants may carry out some commercial activities at the premises from a room also used for domestic purposes, provided that the primary use of the premises is as a home. Examples of commercial activities include working or running a business from home.
- 3.69 We will accept a property's SAP assessment or domestic EPC as sufficient evidence to prove that a property is not being primarily used for commercial purposes, as only domestic properties can qualify for SAP. Any mixed-use areas of the dwelling that are included in the SAP assessment will qualify for the Great British Insulation Scheme.
- 3.70 Where a property has an integral home office or studio etc, the occupier of the property will still be able to apply to the Great British Insulation Scheme provided the property qualifies for a SAP assessment, as SAP assessments can only be performed on properties assessed to be primarily for domestic use.
- 3.71 Care homes and student halls of residence will not be eligible for Great British Insulation Scheme measures as these are commercial properties.

Houses in multiple occupation

- 3.72 Houses in multiple occupation (HMOs) can be treated as part of the Great British Insulation Scheme if at least one household occupying the HMO is eligible to receive support from the Scheme.
- 3.73 Some properties have shared facilities, such as kitchens and bathrooms, but are essentially separate households. In these cases, a SAP assessment may not be possible on the individual unit or room. This means that the SAP assessment will include all the rooms, including all shared facilities.
- 3.74 As defined in the Housing Act 2004²⁵, a HMO cannot be formed by a single household and is set up by separate units of living accommodation. The separate units are treated as a single dwelling if they are assessed as such during a SAP assessment.

²⁵ For further information on HMOs, section 254 in the Housing Act 2004
<https://www.legislation.gov.uk/ukpga/2004/34/contents>

- 3.75 Proof of rent (or another form of consideration) of at least one resident in the HMO must be retained.
- 3.76 Occupancy requirements for HMOs are the same as for other types of domestic premises (see paragraph 3.57).

Rural and off-gas premises

- 3.77 Great British Insulation Scheme measures may be delivered in rural and off-gas premises. Measures delivered to low-income households in rural off-gas properties in Wales and Scotland will receive an uplift of 20%.
- 3.78 A 'rural area' refers to an area classified as rural in the '2011 rural-urban classification of output areas' document for properties in Wales,²⁶ and in the 'Scottish Government Urban Rural Classification 2016' document for properties in Scotland²⁷.

Declaring Off-gas premises

- 3.79 Off-gas premises are those premises not connected to a pipe-line system operated by a gas transporter on 31 March 2022.²⁸ We will require the Retrofit Coordinator to fill out the Great British Insulation Scheme Pre-Retrofit Eligibility and Premises Declaration and declare whether or not a connection to gas pipeline was present before 31 March 2022.
- 3.80 Off-gas premises are considered premises²⁹:
- a) Where the primary heating system is a fixed coal, oil, or LPG heating system;
 - b) Where the home has a fixed electric heating system with no evidence of using a gas cooker; or
 - c) Where there is no fixed gas heating system in place and no connection to mains-gas present (including a gas cooker).
 - d) The Retrofit Coordinator collects off-gas information through an RdSAP assessment and lodges it in the TrustMark's Data Warehouse in the field

²⁶ <https://www.gov.uk/government/statistics/2011-rural-urban-classification>

²⁷ <https://www.gov.scot/publications/scottish-government-urban-rural-classification-2016/pages/2/>

²⁸ See Article 2(1) of the ECO4 Order which is referred to for the definition of this in the draft ECO4A Order

²⁹ ECO4 Government Response p.54

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

'MainsGas'. Evidence should be retained to prove the premises was not connected to any pipe-line system operated by a gas transporter.

How to determine rural premises

- 3.81 Suppliers may use the ONS Postcode Directory,³⁰ or an equivalent system, to ensure measures are installed in eligible rural areas. Suppliers can look up a postcode and read off the value in the pop-up under 'Rural Urban Indicator' or download the latest available dataset, find the relevant postcode, and read off the corresponding value in the 'ru11ind' column - see below for which codes indicate a rural location.
- 3.82 In **Wales**, the Rural Urban Indicator Codes D1, D2, E1, E2, F1 and F2 qualify as rural areas.
- 3.83 In **Scotland**, the classifications 6, 7 and 8 indicate rural areas. This is based on the 8-fold classification as per Scottish Government Urban Rural Classification 2020³¹ and which are reflected in the ONS Postcode Directory and the Rural-Urban Classification for Output Areas Locator Tool. These areas represent the following rural areas:
- 6 – Accessible Rural Areas
 - 7 – Remote Rural Areas
 - 8 – Very Remote Rural Areas

Private rented sector

- 3.84 Private Rented Sector (PRS) properties can receive Great British Insulation Scheme measures in some circumstances. The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 establish a Minimum Level of Energy Efficiency Standard (MEES) for PRS properties.³² Under the Private Rented Sector Minimum Standard Regulations, landlords are obligated with certain requirements including to meet minimum standard of SAP Band E before the property can be let. Therefore, properties with a SAP band of F and G are not eligible for the Scheme, except in England and Wales where two exceptions may apply.

³⁰ <https://onsdigital.github.io/postcode-lookup/>

³¹ In the alternative 6-fold classification, the equivalent rural areas are classified as 5 and 6. See <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2022/05/scottish-government-urban-rural-classification-2020/documents/scottish-government-urban-rural-classification-2020/scottish-government-urban-rural-classification-2020/govscot%3Adocument/scottish-government-urban-rural-classification-2020.pdf>

³² <https://www.gov.uk/guidance/domestic-private-rented-property-minimum-energy-efficiency-standard-landlord-guidance>

- 3.85 Exceptions to the requirement for PRS properties to be Band D or E in England or Wales (and where SAP Band F and G are eligible) are if the property is registered on the PRS Exemptions Register³³ in accordance with regulation 36(2) of the 2015 Energy Efficiency (Private Rented Property) (England and Wales) Regulations (2015 No 962)³⁴
- 3.86 Whether a property is on the PRS Exemptions Register can be determined and evidenced by checking the public PRS Exemptions register website³⁵. This website enables an individual property postcode to be entered to get confirmation of whether it is on the exemption register.

PRS General eligibility group

- 3.87 Measures that qualify for the Great British Insulation Scheme in general eligibility group PRS properties are higher cost scheme measures. Therefore, PRS properties in the general eligibility group are not eligible for loft or cavity wall insulation. General eligibility PRS properties are eligible for insulation measures such as:

- Solid wall
- pitched roof
- flat roof
- under floor
- solid floor park home and
- room in-roof insulation

PRS Low-income group

- 3.88 Qualifying Great British Insulation Scheme measures in low-income group PRS properties are eligible for all insulation measures, however secondary heating controls are not eligible.

Evidence needed for PRS properties

- 3.89 To evidence whether properties are PRS, we will require suppliers to obtain a declaration from the customer confirming the tenure. This should be included on the Great British Insulation Scheme Pre Retrofit Eligibility and Premises Declaration. Suppliers may also use the ECO4 and the Great British Insulation Scheme - Templates to Evidence Private Domestic Premises and Social Housing³⁶. These templates are to be

³³ [Guidance on PRS exemptions and Exemptions Register evidence requirements - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prs-exemptions-and-exemptions-register-evidence-requirements),

³⁴ [The Energy Efficiency \(Private Rented Property\) \(England and Wales\) Regulations 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2015/962/regulation-36-2)

³⁵ <https://prsregister.beis.gov.uk/NdsBeisUi/register-search-exemptions>

used in scenarios where the documents to be provided on request, as outlined in the ECO4 or Great British Insulation Scheme Delivery Guidance, are not available.

Suppliers must obtain the landlord's permission for the delivery of a measure(s) in a PRS property.

- 3.90 This can be evidenced in the 'Declarations and sign off' section in the Scheme Pre Retrofit Eligibility and Premises Declaration ³⁷.
- 3.91 Suppliers may choose to have further evidence requirements in relation to PRS properties beyond this. This could be in the form of a copy of a valid tenancy agreement.
- 3.92 To evidence that a Band F or G PRS property is eligible for a Great British Insulation Scheme measure either a screenshot must be provided of the PRS exemptions register³⁸

Social housing

- 3.93 Great British Insulation Scheme measures with the exception of heating control measures can also be delivered to social housing with a SAP energy efficiency rating of E, F, and G, where the premises are let below the market rate. All eligible social housing will be treated through the low-income group rather than any being eligible through the general group. The type of measures that can be delivered to social housing properties is dependent on the SAP energy efficiency rating of the property prior to the installation of measures.
- 3.94 Delivery to E, F and G-rated social housing premises is available to all the insulation measures, which are:
- a) Cavity wall insulation
 - b) Solid wall insulation
 - c) Loft insulation
 - d) Pitched roof insulation

³⁷ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

³⁸ <https://prsregister.beis.gov.uk/NdsBeisUi/register-search-exemptions>

- e) Under floor insulation
- f) Solid floor insulation
- g) Park home insulation
- h) Room in roof insulation
- i) Innovation measures (IMs)

3.95 Delivery to D rated social housing is limited to IMs that are not a heating control measure.

Determining whether properties are social housing

3.96 In England and Wales, premises are considered to be social housing if the relevant interest is registered on the Land Registry as belonging to a social landlord.³⁹

3.97 In Scotland, premises are considered to be social housing if the relevant interest is registered on the Land Register of Scotland or recorded in the Register of Sasines as belonging to a social landlord.⁴⁰

3.98 Where premises are not registered, it can be considered as social housing where there is proof that a social landlord lets the property.⁴¹

3.99 Information on how to identify social landlords can be found in Appendix 2 – Premises and occupant requirements.

3.100 The supplier must collect a declaration on the Great British Insulation Scheme Eligibility and Premises Declaration signed by or on behalf of a social landlord providing assurance that the SAP assessment reflects the current characteristics of the property. The signatory should have sufficient and appropriate authority to act on behalf of the social landlord.

³⁹ The ECO4A Order refers to Schedule 2 paragraph 3(a) of the ECO4 Order for this definition

⁴⁰ The ECO4A Order refers to Schedule 2 paragraph 3(b) of the ECO4 Order for this definition

⁴¹ Other than under a lease granted pursuant to Part 5 of the Housing Act 1985 or sections 61 to 84 of the Housing (Scotland) Act 1987, as modified by section 84A of that Act. For further information see Schedule 2 of the ECO4 Order.

Determining whether the premises are let below market rate

- 3.101 Social housing under this provision will only be eligible where the housing is let below the market rate. The supplier must produce a declaration signed by a social landlord providing confirmation that the social housing premises are let below the market rate, or where the premises are currently void, have previously and will be let below the market rate. The declaration to be signed by a social landlord is included within the Eligibility and Pre-Retrofit Declaration form. This declaration form must be retained by suppliers and be available on request for audit purposes.
- 3.102 Where social housing is let at or above the market rate, the property can be treated as a private domestic premises, where the occupant meets the eligibility requirements. See section on PRS from paragraph 1.13 for more information.
- 3.103 For more information on how market rate is determined for different areas see Appendix 2 – Premises and occupant requirements.

In-fill

- 3.104 Under the Great British Insulation Scheme, there are two different categories for in-fill depending on whether the properties are flats or houses.
- 3.105 The ECO4A Order⁴² defines a 'flat'⁴³ as:
- a) in respect of domestic premises in England and Wales, has the same meaning as in the Building Regulations 2010(a).
 - b) in respect of domestic premises in Scotland, has the same meaning as in the Building (Scotland) Regulations 2004(b) and also includes a maisonette, as defined in those Regulations.
- 3.106 The ECO4A Order considers a house⁴⁴ "a domestic premises that is not a flat" where 'flat' has the same meaning as in the ECO4A Order as referenced above.
- 3.107 The scores for in-fill premises are set out in Chapter 6: Scores. For in-fill measures, a pre-retrofit RdSAP assessment needs to be performed before the installation of the in-fill measure in order to calculate the SAP rating of the premises. If suppliers wish to treat a property under in-fill they need to submit information about the associated

⁴² <https://www.legislation.gov.uk/ukdsi/2023/9780348248340/contents>

⁴³ Article 20(3) of the ECO4A Order 2023

⁴⁴ See article 21(3) of the ECO4A Order: 'where "flat" has the same meaning as in article 20(3) <https://www.legislation.gov.uk/ukdsi/2023/9780348248340/contents>

Great British Insulation Scheme treated property via the Scheme register, alongside other required property and measure details. In order to be validated, suppliers need to specify which premises are treated under in-fill and which Great British Insulation Scheme treated properties are associated with it. A Great British Insulation Scheme measure installed in a property cannot support more than one in-fill measure. There is no requirement that the associated scheme measure is determined to be completed as long as the associated scheme measure has been notified.

- 3.108 The associated scheme measure must be the same type of measure that is installed in the in-fill property. The ratio of associated scheme measures to the in-fill measure depends on whether a property is a house or a flat, which is described below under the respective sections for in-fill flats and in-fill houses.
- 3.109 When notifying an in-fill measure the primary measure/s must be identified in that notification.
- 3.110 In-fill measures must be promoted by the same supplier and notified against the same supplier licence. When transferring measures between suppliers (inter-supplier transfers), in-fill measures cannot be transferred until all the in-fill and primary measures are approved. Once the measures have all been verified, they can only be transferred as a group. For transfer between different licenses of the same supplier (intra-supplier transfers) measures don't need to be approved before the transfer. See Chapter 8: Transfers of measures in the Great British Insulation Scheme Supplier Administrative Guidance⁴⁵ for further information on inter- and intra-supplier transfers.
- 3.111 If a measure at an ECO-eligible property is not approved or gets rejected at a later stage, for example if the household or property was found to be ineligible for the Great British Insulation Scheme, then any linked in-fill property where a measure was installed would also not be approved. If the decision to refuse or revoke the savings of a supporting measure is taken, suppliers will be able to update the notification of the in-fill measure to link it to a different associated ECO-eligible property, given it meets all relevant criteria.

In-fill flats

- 3.112 For every Great British Insulation Scheme eligible flat another 'in-fill' flat whose household would not otherwise be eligible for the Scheme can be treated under the Scheme in-fill. For example, in a block of flats, the whole block can be upgraded if at least 50% of the flats are occupied by scheme eligible households. For illustration of

⁴⁵ <https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-supplier-administration-guidance>

this, Figure 4: In-fill flats shows an example of a block of flats that can be treated wholly under Great British Insulation scheme, given over half of the block of flats are eligible under the Scheme.

3.113 Eligible measures for flats treated as in-fill include:

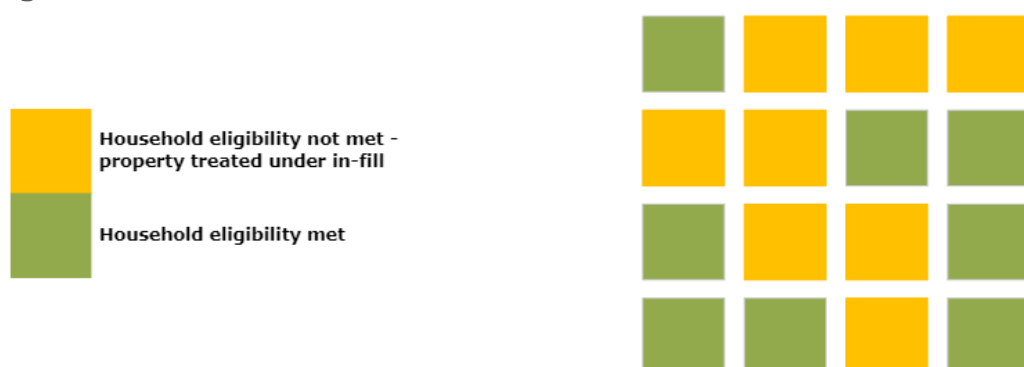
- a) Solid wall insulation
- b) Cavity wall insulation.

3.114 The in-fill measure has to be linked to the same kind of measure in the associated Great British Insulation Scheme property, ie if the in-fill measure is a solid wall insulation, it needs to be linked to a solid wall insulation in the associated Great British Insulation Scheme measure in the other property.

3.115 The in-fill flats within the same block can be either privately rented, owner occupied or social housing. No restrictions apply to in-fill flats regarding their SAP rating. The associated Great British Insulation Scheme flat in which the original measure has been installed must meet the Scheme eligibility requirements.

3.116 The in-fill measure needs to be finalised within three months from the installation of the associated Great British Insulation Scheme measure with which it is being linked. For a flat, this means that a three-month deadline starts on the date of the DOCI of the associated measure in the linked Great British Insulation Scheme flat. See from paragraph 1.21 - for measure completion timings.

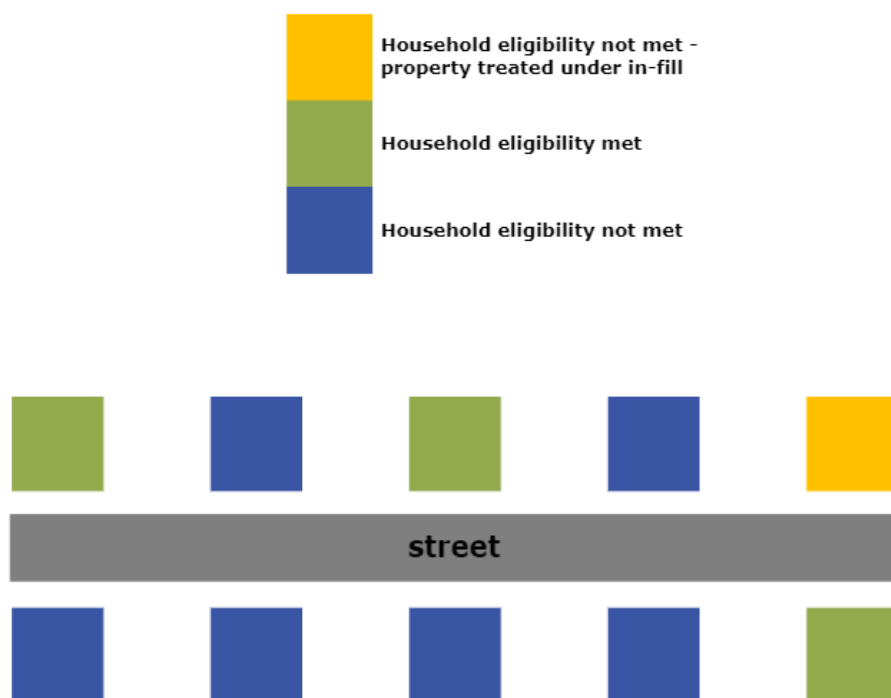
Figure 4: In-fill flats



In-fill houses

- 3.117 Houses can be treated under Great British Insulation Scheme in-fill with a ratio of 3:1, so one in-fill property can be treated for every three scheme treated houses.
- 3.118 The in-fill house can be owner occupied, PRS or social housing and must be in SAP band D, E, F or G before the installation of the measure. The original Great British Insulation Scheme treated property to which the in-fill measure is being linked must meet all Great British Insulation Scheme eligibility requirements.
- 3.119 The eligible measures for in-fill houses are limited to solid wall insulation.
- 3.120 The in-fill measure must be linked to a solid wall insulation measure in the associated Great British Insulation Scheme treated property, ie it needs to be linked to **three** solid wall insulation measures, each in a different Great British Insulation Scheme treated property.
- 3.121 The in-fill house must be located on the same street (name) as the three Great British Insulation Scheme-eligible houses and hence, have the same street address as the Scheme treated houses.
- 3.122 The in-fill measure needs to be finalised within three months from the installation of the last of the three associated Great British Insulation Scheme measures. This means that three months start with the DOCI of the last of the three associated measures in the Great British Insulation Scheme treated houses. See from paragraph 1.21 for measure completion timings.
- 3.123 Figure 5: In-fill houses shows a street with three Great British Insulation Scheme treated houses, which means that one in-fill property on the same street can be treated along with three other properties eligible for the Scheme.

Figure 5: In-fill houses



The occupant requirement

3.124 Where measures are delivered to private domestic premises, except in the case of in-fill, the premises must either be occupied by:

- a) a member of the low-income group, or
- b) a household declared by a relevant authority⁴⁶ as meeting one of the three Great British Insulation Scheme Flex referral routes.

3.125 The eligibility requirements do not apply to properties within the general group. They also do not apply to properties receiving in-fill measures. The eligibility requirements do not apply to measures delivered to social housing where the premises are let below the market rate.

⁴⁶ See Article 2 of the ECO4 Order for the definition of a local authority

Great British Insulation Scheme-eligible benefits

3.126 Householders who receive specific benefits (or if in receipt of Child Benefit and are below the equivalised income threshold for the household composition) are members of the low-income group. A supplier can promote a measure to occupants of private domestic premises if they are in the low-income group or live with someone in the low-income group in the same premises. Low-income group is based on a tenant's status rather than the landlord's, where the property is rented above the market rate.

Evidencing eligibility

3.127 There are several things to consider when collecting evidence for low-income group eligibility. Suppliers must ensure:

- a) The measure is being installed at private domestic premises where a low-income group member lives, and appropriate evidence is available to demonstrate this.
- b) Benefit letters are from official departments or organisations (See Appendix 2 – Premises and occupant requirements for example benefit letters).
- c) The relevant information provided on the forms is clearly visible.
- d) The household eligibility requirement is met, such that the premises are occupied by a member of the low-income group at any time within a 12-month period ending with the day on which the measure is completed, with the exception of Warm House Discount (WHD) Core Group 1 and Core Group 2 customers in England and Wales and Core Group customers in Scotland.

3.128 All documents showing low-income group eligibility must be dated within a 12-month period ending with the day on which the measure is completed. Once successfully data matched, this will act as sufficient evidence for low-income group eligibility in the case of audit.

3.129 All documentation providing evidence of low-income group eligibility and DWP/EST data-matching must be dated within 12 months and checks on eligibility must be carried out before install ending with the day on which the measure is completed.

3.130 For suppliers to demonstrate that the occupant requirement is met, they must be able to provide evidence of the following:

- a) A person's membership of the low-income group, and
- b) That the person is an occupant of the premises.

3.131 A person living at private domestic premises is an eligible member of the low-income group if they receive at least one of the following benefits and satisfy the relevant income requirements, where applicable:

Table 2: List of eligible benefits under the Great British Insulation Scheme low-income group

Benefits that are eligible under the Great British Insulation Scheme low-income group
1) Income based Jobseekers Allowance (JSA)
2) Income related Employment and Support Allowance (ESA)
3) Income Support (IS)
4) Pension Credit Guarantee Credit (PCGC)
5) Working Tax Credit (WTC)
6) Child Tax Credit (CTC)
7) Universal Credit (UC)
8) Housing Benefit
9) Pension Credit Savings Credit (PCSC)
10) Child Benefit (subject to income caps and composition)

3.132 Households with disabilities would only be an eligible member of the low-income group where they are in receipt of a means tested benefit or found eligible under one of the three routes outlined in Great British Insulation Scheme Flex.

3.133 Suppliers can demonstrate to us that the occupant requirement is met by ensuring that a copy of the relevant documents is made available at audit.

Evidencing low-income group eligibility

3.134 We do not require full 'proof of benefit' letters. To evidence low-income group eligibility, we only need the page(s) that show:

- a) Name, benefit type, and benefit address matching where the measure was installed. Where the address is different, official documents proving they resided at the premises where the measure was installed

- b) Official letter headed paper from HMRC, DWP/Jobcentre Plus, HM Government, or the Pension Service
- c) Name, benefit type, and benefit address matching where the measure was installed. Where the address is different, official documents proving they resided at the premises where the measure was installed
- d) Relevant date (either of the letter, start or end of the benefit), and
- e) Confirmation that a customer receives a qualifying benefit through a bank statement, for example.

Matched WHD Core Group notice

3.135 A supplier can produce a matched WHD Core Group 1 and Core Group 2 notice in England and Wales, or Core Group notice in Scotland for each respective scheme year to satisfy us that a person is a member of the low-income group during audits. Core Group notices can be accepted prior to 30 March 2023. Please note that there are now three different Core Group letter types.

Matched DWP reference number

3.136 Suppliers or members of the supply chain may arrange for the Energy Saving Trust (the data-matching service provider), who have a contract with DWP, to confirm that a person is a member of the low-income group.

3.137 If DWP confirms (via the Energy Saving Trust) that a person receives a low-income group benefit, the supplier may rely on this as a way of demonstrating that a person is a member of the low-income group. If a supplier wishes to rely on a DWP confirmation, it must include the 10-digit reference number provided by the data-matching service provider when notifying the measure. This is the 'DWP reference number' in the notification template. This reference number will also be accepted where it is preceded by the three digits identifying the service user.

3.138 The Energy Saving Trust refer the following categories of people to suppliers:

- a) **Matched** - a person who is confirmed by DWP as receiving a low-income group benefit
- b) **Unmatched** – a person who is confirmed by DWP as not receiving a low-income group benefit at the time of the search

- c) **Un-verified** – the person's details could not be found and verified by DWP. This is typically due to an error with the data submitted (ie hidden spacing or a spelling mistake).

- 3.139 We will conduct these checks during monthly processing. All documents showing low-income eligibility must be dated within a 12-month period ending with the day on which the measure is completed. Where the 'matched' DWP reference number is dated more than 12 months before the end of the date of completed installation of the first measure, suppliers will receive error notifications through monthly processing.
- 3.140 Suppliers will also receive error notifications if the date that is provided via data-matching is after the date on the DOCI for the first measure within a project.
- 3.141 In these cases, we will require alternative evidence to demonstrate that a person was in receipt of a low-income group benefit and was residing at the address at the time of installation.
- 3.142 An 'unmatched' or 'unverified' referral will not be sufficient to satisfy us that a person is a member of the low-income group. In this case, the supplier should not include the DWP reference number when notifying the measure. The supplier should satisfy us that the relevant person is a member of the low-income group through one of the other routes detailed in this section. They should also ensure that any additional evidence that demonstrates this is made available on request.
- 3.143 Where suppliers initially notify unmatched or unverified measures on the scheme register, these measures will need to be either amended manually by the supplier, or the supplier will need to renotify the measure on the ECO Register with the 'matched' DWP reference number or use another route to evidence low-income group eligibility.
- 3.144 Recipients of UC can be on either the full service or the live service. Both full service and live service UC records can be data matched by DWP.

ECO Eligible Referrals (EER)

- 3.145 Under the Great British Insulation Scheme, suppliers can also use the ECO Eligible Referral (EER) route to identify eligible households. This route allows suppliers to identify whether their customers are in receipt of ECO eligible benefits through a check with DWP.
- 3.146 In order for the customer to be eligible, the evidence provided through this check must be dated within 12 months prior to the installation of the measure. See [Evidencing Eligibility](#) section for more information.

3.147 If DWP confirms that a person receives a low-income group benefit, the supplier may rely on this as a way of demonstrating that a person is a member of the low-income group. If a supplier wishes to rely on a DWP confirmation, it must include the EER URN when notifying the measure to Ofgem. This URN must start with 'EER' and a prefix to indicate supplier, followed by a unique number. Suppliers must also notify the low-income group Verification Method as 'ECO Eligible Referral' on their notification template.

Income levels under Child Benefit

3.148 We expect suppliers to communicate to the supply chain that where a person is in receipt of one of the low-income group qualifying benefits listed in Table 2 this evidence route should be pursued before using Child Benefit. Verifying eligibility through the Child Benefit route should be the method of last resort and only utilised where **all** other routes of establishing eligibility are exhausted.

3.149 If Child Benefit is used to evidence low-income group eligibility, suppliers should collect a householder's self-declaration, as well as evidence showing that the household is in receipt of Child Benefit payments. They should also evidence that the occupier's gross income is within the Great British Insulation Scheme Child Benefit thresholds based on whether the householder is a single or couple household, see below in [Table 3](#).

3.150 Suitable evidence would include last three consecutive payslips if paid monthly (or equivalent length) alongside bank statements from the last three months from all accounts receiving an income, or the most recent year's P60/tax return.

3.151 If the P60 was issued 6+ months ago, it may only be used in combination with additional evidence such as recent payslips/bank statements.

3.152 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 eg three bank statements from last 3 months.

3.153 Evidence such as a P45 from the last 3 months can be used in combination with other supporting evidence.

3.154 The sole use of customer self-declarations to prove householder eligibility is no longer sufficient by itself. To confirm the number of adults residing at the address, and whether in a single or couple household, suitable evidence would include;

- a) customer self-declarations supported by council tax letters

- b) tenancy agreements
- c) mortgage statements
- d) electoral register
- e) soft credit check

3.155 To confirm the number of children within the household, this may be evidenced by showing the child benefit letter supported by the payment.

3.156 Evidence should be dated no more than 12 months before the day on which the measure is completed, and the evidence cannot be dated after the day of completed installation. This verifies that the person living at the premises is confirmed to not only be in receipt of Child Benefit, but also is under the relevant annual income threshold for the household composition.

3.157 The declaration must also be counter-signed by the relevant third party to provide assurance that the person living at the premises is in receipt of Child Benefit and is not in receipt of any of the other qualifying benefits listed in Table 2. The relevant third party could include, but is not limited to: the installer, operative, assessor or managing agent. We will monitor the number of measures notified using the Child Benefit eligibility route and may undertake targeted audits where considered appropriate. In this instance, we will work with suppliers to seek assurance that household eligibility has been appropriately verified, and other routes discounted, as well as verifying the evidence. Where there is evidence of suspected fraud or misrepresentation this will be treated under our existing Counter Fraud policies, and measures will be at risk of rejection. Further information on our Counter Fraud policies is provided in [Chapter 8](#).

Child Benefit income thresholds

Table 3: Great British Insulation Scheme Child Benefit income thresholds (before tax and National Insurance)

Type of claimant	Number of children or qualifying young persons			
	1	2	3	4 or more
Single claimant	£19,900	£24,800	£29,600	£34,500
Member of a couple	£27,500	£32,300	£37,200	£42,000

Great British Insulation Scheme Flex for Local Authorities and Suppliers

- 3.158 Suppliers can deliver up to 80% of their low-income minimum requirement obligation through the Great British Insulation Scheme flexible eligibility (Great British Insulation Scheme Flex) route. Delivery under Great British Insulation Scheme Flex is optional for suppliers.
- 3.159 We have provided guidance below on this eligibility route for suppliers and supply-chain members. There is a separate guidance document for Local Authorities (LAs), the Great British Insulation Scheme and ECO4 Guidance for Local Authority Administration, which is published on the Ofgem website⁴⁷.
- 3.160 There are three separate qualifying routes to identify low income, fuel poor and vulnerable households. Under the LA Flex policy all routes can be used as evidence by a single LA to determine eligibility, and each route should be used independently of each other. The eligible routes are:

⁴⁷ <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-local-authority-administration-guidance>

Table 4: Great British Insulation Scheme Flex Routes

Route	Explanation
Route 1: Household Income	<p>Households with a gross annual income of less than £31,000 (including overtime payments and interest earned on savings), provided they have a pre-installation SAP band of D-G if they are owner occupied properties, or D-G (including F and G if exempt from MEES*) if they are private rented sector properties. 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.</p> <p>This is the combined whole household income, including every person 18+ years living at that address, such as lodgers and elderly relatives etc.</p>
Route 2: Proxy Targeting	<p>Households that meet at least two of the following proxies, provided they have a pre-installation SAP band of E-G for owner occupied households and private rented sector E (including F and G if exempt from MEES) households.</p> <p>Proxies 1 & 3 cannot be used in combination with each other. Proxy 7 cannot be used in combination with proxy 5 or proxy 6.</p> <p>Proxy 1 - Homes in England in Lower-layer Super Output Area (LSOA) 1-3 on the English Indices of Deprivation 2019⁴⁸ or homes in Wales in LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019⁴⁹, or homes in Scotland in "data zone" 1-3 on the Scottish Index of Multiple Deprivation 2020⁵⁰*</p> <p>Proxy 2 - A person living at the premises is entitled to a Council Tax reduction on the grounds of low income</p> <p>Proxy 3 - A person living at the premises is considered to be vulnerable to the cold under the National Institute for Health and Care Excellence (NICE) Guidance: Recommendation 2, for a reason other than their low income⁵¹*</p> <p>Proxy 4 - A child living at the premises is eligible for free school meals, due to low-income⁵²</p> <p>Proxy 5 - A person living at the premises is supported by a LA run scheme that is named and described in their Statement of Intent, and established to support people living on a low income and vulnerable to the cold under NICE Guideline NG6</p>

⁴⁸ 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".

⁴⁹ Published at <https://stats.wales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Welsh-Index-of-Multiple-Deprivation/WIMD-2019>

⁵⁰ 2022v2. Published at <https://www.gov.scot/publications/scottish-index-of-multiple-deprivation-2020v2-ranks/>

⁵¹ <https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations#recommendation-2-ensure-there-is-a-singlepointofcontact-health-and-housing-referral-service-for>

⁵² Under section 512ZB(4) of the Education Act 1996 or section 53 of the Education (Scotland) Act 1980

	<p>Proxy 6 - A person living at the premises has been referred to the LA 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. This proxy is restricted to those mentioned in this list.</p> <p>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)*.</p> <p>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.</p> <p>b) PPM customers: Suppliers may also identify PPM households who:</p> <ul style="list-style-type: none"> • 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.
<p>Route 3: NHS Referrals</p>	<p>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, provided they have a pre-installation SAP band of D-G if they are owner occupied properties, or D-E (including F and G if exempt from MEES) if they are private rented sector properties.</p> <p>The person's severe or long-term health condition must be due to:</p> <ul style="list-style-type: none"> • A cardiovascular condition, • A respiratory disease, • Limited mobility, or • Immunosuppression. <p>The LA must complete a declaration certifying that it has received a referral from one of the following:</p> <ul style="list-style-type: none"> • A person registered in the General Practitioner (GP) Register, • A Scottish Health Board, • A Welsh Health Board, • An NHS Foundation Trust, or • An NHS Trust.

*MEES = Minimum Level of Energy Efficiency Standard

3.161 Evidence for each of these routes will be sourced from different organisations and the table in Appendix 2 – Premises and occupant requirements outlines a non-exhaustive list of evidence examples for the evidence routes stated above. Evidence for Route 2 proxy 6 or 7 will come from energy suppliers, otherwise known as supplier referrals.

3.162 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 households under Route 2 from Table 4 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.

3.163 Table 5 below provides two examples of evidence related to suppliers.

Table 5: LA and Supplier Flex evidence examples

Actor	LA and Supplier Flex eligibility	Evidence
<i>LA Flex Example 1: LA and supplier collected evidence</i>		
LA	<p>A non-pre-payment meter household has been in debt for 100 days and is repaying their fuel debt through 3rd party deductions.</p> <p>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.</p>	LA signed declaration
<i>Supplier Flex Example 2: evidence collection from suppliers</i>		
Supplier	<p>A pre-payment meter household has been self-disconnected from its provider for six weeks.</p> <p>This household also receives Council Tax reductions based on low-income.</p>	Supplier evidence this referral via their measure notification

3.164 The roles of LAs / DAs, suppliers / installers, Ofgem and The Department of Energy Security and Net Zero are detailed below, summarising their responsibilities within Great British Insulation Scheme Flex.

Table 6: Summary of the roles and responsibilities of the different organisations involved in Great British Insulation Scheme Flex.

Organisation	Summary of roles and responsibilities
Local Authority / Devolved Administration	<p>Statement of Intent</p> <ul style="list-style-type: none"> LAs / DAs can volunteer to participate in 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 template⁵³, which outlines their intention to participate in the scheme and their commitment to follow the scheme rules and routes as set out in the Electricity and Gas (Energy Company Obligation) Order 2023 (ECO4A Order). <p>Declaration</p> <ul style="list-style-type: none"> LAs / DAs are responsible for determining whether households are eligible and will also need to produce declarations to suppliers / installers for all households they identify. LAs / DAs can identify households in their area and for other areas where they have been given delegated authority from another LA / DA. <p>Declaration notification</p> <ul style="list-style-type: none"> LAs / DAs must submit a declaration notification for all households they identify to Ofgem. 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. <p>Evidence holding requirements</p> <ul style="list-style-type: none"> 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 to for audit purposes, for up to three years after the Final Determination of the Great British Insulation Scheme at a minimum.
Supplier / Installer	<ul style="list-style-type: none"> 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.

⁵³ <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-la-and-supplier-flex-forms-and-subsidiary-documents>

	<p>SAP bands</p> <ul style="list-style-type: none"> 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 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. 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. Suppliers are responsible for ensuring they meet their obligations under the scheme, and that measures installed under the Great British Insulation Scheme are delivered in line with the low-income minimum requirement. <p>Supplier measure notifications</p> <ul style="list-style-type: none"> The Great British Insulation Scheme Flex route used to identify households and the measures 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 Great British Insulation Scheme Flex (Supplier Flex) or work with relevant authorities under the scheme (LA Flex). Where suppliers self-refer an eligible Great British Insulation Scheme Flex household via Supplier Flex they must produce details of this on their measure notification. <p>Evidence holding requirements</p> <ul style="list-style-type: none"> 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 to for audit purposes, for up to three years after the Final Determination of the Great British Insulation Scheme at a minimum. Where 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.
<p>Ofgem</p>	<ul style="list-style-type: none"> Ofgem administers 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 audits. 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 of Energy Security and Net Zero	<ul style="list-style-type: none"> The Department of Energy Security and Net Zero is responsible for setting the overall policy for the scheme.
TrustMark and TrustMark Equivalent Organisations	<ul style="list-style-type: none"> TrustMark is responsible for ensuring installers comply with PAS and MCS standards and that appropriate guarantees are in place. Measures installed according to PAS or MCS must be installed by, or under the responsibility of, a person who is registered with TrustMark for the purposes of that measure. 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 standards and arrangements for repairs and other remedies, which are equivalent to what TrustMark requires.

Great British Insulation Scheme Flex audits and mismatches

3.165 Where there is a mismatch between what a supplier notifies and what is included in the LA declaration notification, an error will be flagged, and this will be sent back to the supplier for remediation. Where evidence cannot be obtained, we will be minded to reject the measures.

3.166 Table 7 Below are some examples of potential causes of mismatches and the remediation steps:

Table 7: LA declaration notification and supplier measure notification mismatches and remediation steps

Error	Remediation steps
Supplier notifies measure using LA Flex eligibility but there are no declaration notification details that match the declaration number or address.	<p>This could occur when the LA has not submitted the declaration notification for that household prior to the supplier notifying the measure. Potential options:</p> <ul style="list-style-type: none"> • Notify supplier that declaration notification doesn't exist; • Measure held until next processing round to give time for declaration notification to be submitted then flag to supplier.
Measure uses the same URN as a previous measure.	Supplier would need to reassess their measure Notification Reference to ensure that each measure has been installed with a separate reference identity.

3.167 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 scheme.

3.168 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.

3.169 If the supplier's evidence is insufficient or incorrect, they will need to engage with the LA or installer to review their data.

3.170 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.

3.171 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.

3.172 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.

3.173 Ofgem would expect suppliers to consider results from the report when delivering LA Flex measures for the following year.

4. Retrofits

- 4.1 PAS 2035:2019⁵⁴ 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.
- 4.2 It supports both the one-off installation of improvement measures and a staged approach in which improvement measures are implemented over time.
- 4.3 PAS 2035:2019 is the over-arching document in the retrofit standards framework, with which users of the TrustMark Government-endorsed quality scheme are required to comply when carrying out domestic retrofit work. It may also be applied to retrofits outside the TrustMark Quality Assurance Framework. The TrustMark Quality Assurance Framework references measures from the PAS 2030:2019 standard.
- 4.4 PAS 2030:2019 sets out how the installation of specific energy efficiency measures should be carried out in existing domestic buildings. The primary objective is the provision of a robust, uniformly applicable energy efficiency measure installation process that will assist installers that comply with its requirements in full to demonstrate that their installation processes can provide installation to specification and in accordance with the client's expectations.
- 4.5 This will involve insulation and, in some cases, secondary heating controls referred to in PAS 2035:19 that will follow the domestic retrofit process required. This includes but is not limited to
 - a pre-retrofit assessment
 - development of an improvement option evaluation and medium-term improvement plan⁵⁵
 - installation of measures, commissioning, and handover.

⁵⁴ <https://shop.bsigroup.com/products/retrofitting-dwellings-for-improved-energy-efficiency-specification-and-guidance-3/standard>

⁵⁵ Projects assessed to follow the Path A domestic retrofit process may not require an improvement option evaluation and medium-term plan. See PAS2035:19 0.5

- 4.6 This initial pre-retrofit assessment is the start of the lifecycle of a project and determines the starting SAP rating of the property which is needed to evidence eligibility and calculate scores.
- 4.7 We expect that measures will be in compliance with PAS 2035 and will be managed by a Retrofit Coordinator. They should be qualified in accordance with the requirements set out in Annex A of PAS 2035:2019. They are also responsible for overseeing the project from inception to completion, ie the risk assessment, the dwelling assessment, the retrofit design, installation, and post-retrofit monitoring and evaluation. They will also be responsible for ensuring and claiming compliance with PAS 2035.
- 4.8 We anticipate Retrofit Coordinators working on ECO projects will be aware of Great British Insulation Scheme rules and will manage the retrofits in accordance with these.
- 4.9 Compliance with PAS will be evidenced through TrustMark registration and their Quality Assurance Framework. The measure covered by PAS should be lodged with Trustmark and awarded a relevant certificate of lodgement as a requirement to become a qualifying action.
- 4.10 Where a retrofit includes IM that are not listed in PAS 2035:2019, these may be classed as 'Other EEMs, including innovations' for the purposes of PAS 2035:2019. These retrofits will need to follow the Path C domestic retrofit process.
- 4.11 Where suppliers have a retrofit consisting only of IMs that are not installed in accordance with PAS 2030:2019, and where PAS 2035 is not relevant, suppliers should ensure that measures are installed according to relevant standards for those measures and contact us prior to installation if uncertain.
- 4.12 Other energy efficiency measures that may increase the SAP rating of the property must not be installed between the pre-retrofit SAP assessment and the post-retrofit SAP assessment.

Rejected and non-compliant measures

- 4.13 Measures that are potentially ineligible or non-compliant can be identified through our compliance processes. In some cases, they can also be referred to us by suppliers, other industry parties, or members of the public.
- 4.14 If we have reason to believe a measure is ineligible or non-compliant with the scheme rules, we will provide suppliers with the opportunity to make the necessary representations. If the supplier fails to do so, we may reject the savings for that

measure and will notify the relevant supplier of our intention to refuse or revoke those savings. We will communicate this via a minded-to notice (MTN). This process allows suppliers two weeks to make any final representations. We will consider those representations and determine whether the measure should be rejected from the Scheme. If we decide to reject the measure, we will issue a refusal and revocation decision (RRD) notice.

- 4.15 If a measure is identified through the TrustMark Quality Assurance framework as having been non-compliant at the point of notification, it may have approval revoked. In such instances, suppliers are encouraged to rectify the measure. Rectifications will be monitored by TrustMark. Successful rectification will allow measures to be approved. If measures are not rectified or the rectification is unsuccessful, they may be rejected.
- 4.16 If an occupant or a property was found to be ineligible for the Great British Insulation Scheme in the first place or in the case of fraud or other scheme abuse, all measures in the property will be rejected.

Measure completion timings

- 4.17 All measures under the Great British Insulation Scheme must be completed after 30 March 2023 and on or before 31 March 2026.
- 4.18 All secondary measures must be completed within three months of the DOCI of the primary insulation measure.
- 4.19 All in-fill measures must be completed within three months of the DOCI of the supporting primary measure. In the case of an in-fill house, this deadline is from the latest DOCI of the three associated Great British Insulation Scheme measures. In-fill measures completed beyond this deadline are not eligible and may be rejected.
- 4.20 Aside from the overall scheme deadline listed above, and outside of the specific requirements for heating controls and in-fill properties, there is no deadline on when a measure should be completed in the Great British Insulation Scheme.
- 4.21 However, the DOCI does determine the phase to which the measure applies. A measure with a DOCI within phase A will count towards the phase A obligation, unless the supplier has exceeded their phase A obligation in which case the score for that measure be carried over to a later phase. See paragraph 2.1 for more details on phases and annual targets.

Extraction of pre-existing insulation

- 4.22 The extraction or removal of insulation is not a valid Great British Insulation Scheme measure. However, there are situations where the extraction of defective insulation is necessary to support the installation of a valid measure, in which case extractions may be permitted.
- 4.23 Extraction or removal of insulation will only be valid under the Great British Insulation Scheme where no guarantee exists for the existing insulation (whether that guarantee remains in effect throughout the original term or not). Evidence must be provided to Ofgem that there is no warranty in place that covers the remedial work, for example, confirmation from guarantee providers.
- 4.24 In situations where an appropriate insulation guarantee is still valid, remedial works should be covered by the guarantee and is not valid under the Scheme. If the guarantee is revoked, then a repair and replacement of a measure would not be eligible under the Scheme. For example, if the failure of the measure is due to poor building maintenance, which has had a detrimental effect on the measure, then the Great British Insulation Scheme cannot be claimed under these circumstances.
- 4.25 Where there is a building insurance policy for the property, checks will need to be carried out to verify that the insurance will not cover the insulation removal. These checks could either be an enquiry or claim with the insurance provider or identifying relevant sections in the insurance policy document.
- 4.26 Relevant health and safety checks and procedures for removal must be followed.
- 4.27 Where there is no warranty or guarantee in place and the remedial work is not covered by building insurance or any other means, consumers should contact the installer responsible for the original installation to check if they will provide remediation.
- 4.28 Where there is no warranty or guarantee in place, the remedial work is not covered by building insurance or any other means and the original installer is unable to be contacted or refuses to remediate, insulation extraction may be carried out in the situations listed below. In all cases, evidence should be provided to support the reason for removal, for example a C1 monitoring survey, pre-installation building inspection (PIBI), an inspection report, or expired/no guarantee documentation evidence. Additional evidence may be required in specific cases.
- 4.29 Whilst we await industry to develop a standard methodology and quality assurance framework, currently there is no set list of qualifications for recommending

insulation⁵⁶. However, we recognise the IAA certificate scheme⁵⁷ or anyone with NVQ level 2 in Cavity Wall Insulation Surveying and Extraction⁵⁸ as 'suitably qualified'.

- a) Where the extraction is recommended by a suitably qualified independent professional and either the installation of the insulation was completed prior to the guarantee requirements or the guarantee has expired. The standard evidence should be provided to supporting the reason for removal.
- b) Where the existing insulation has failed as a result of historically poor building maintenance (mould and cold spots are not reasons on their own) and the issues with the building have been rectified to ensure that the property is now in a suitable condition for the insulation to be reinstalled. The standard evidence supporting the reason for removal should be provided to show the building is suitable for new insulation. Ventilation of the property should be assessed to address existing mould and condensation issues prior to further actions.
- c) Where a material is causing or exacerbating structural damage to a property, for example foam products expanding and causing bowed walls in CWI, or exacerbating damp, or where there is an infestation that is causing risk to the occupier's health. In these circumstances, we would expect the installer who carried out the initial works to be contacted to rectify the measure. Where this is not possible, the standard evidence supporting the reason for removal, should be provided, see paragraph 4.28.
- d) Where the existing insulation has failed due to damage from flooding. The standard evidence supporting the reason for removal should be accompanied by a report from a suitably qualified independent professional, such as a certified Property Flood Resilience Surveyor.⁵⁹

⁵⁶ Page 76 of

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1152132/gb-insulation-scheme-government-response.pdf

⁵⁷ <https://www.theiaa.co.uk/news/post/the-iaa-cavity-extraction-amp-remediation-certification-scheme>

⁵⁸ <https://oscaronsite.co.uk/service/cavity-wall-extraction-clearance-certificate/>

⁵⁹ A Property Floor Resilience Surveyor is considered to be a person of appropriate skill and experience to determine which measures are appropriate for the replacement. Please contact us to confirm whether an alternative professional is suitably qualified.

- 4.30 In line with the ECO4 government response⁶⁰, we interpret defective to mean the complete and total failure of the insulation measure, for example, not just some gaps in the distribution of a cavity wall insulation measure.
- 4.31 In these circumstances, a suitably qualified independent professional (eg for CWI and EWI a Chartered Surveyor with the relevant qualifications or a Structural Engineer) must provide appropriate reasoning for removal and replacement of the defective insulation, including:⁶¹
- a) Detailed reasons for why the insulation has to be removed;
 - b) Appropriate evidence that the insulation is directly causing the relevant problems for the premises; and
 - c) A recommendation for the best insulation for the premises (if any).
- 4.32 A suitably qualified individual must have visited and inspected the property in person for the purposes of completing the survey. A recommendation based on remote evidence such as photos or video is not sufficient. Instead, they must carry out stringent inspections, such as through use of a borescope to provide the level of certainty required. The process will also invalidate any existing guarantees present.
- 4.33 Extraction of insulation must follow all relevant standards and requirements and must be carried out by someone independent of the actual inspection. Once the defective insulation has been removed, remedial work must be completed, where necessary, to address any building issues that may have caused the initial insulation to become defective or to remediate any damage caused to the premises. The premises may then be insulated where a Retrofit Coordinator deems this appropriate for the building and location. A measure may be rejected if we find it has been preceded by a historical extraction that does not comply with the guidance. We expect suppliers to have processes in place to check that insulation was not present in the property prior to the measure being installed.

⁶⁰ See paragraph 307

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

⁶¹ A Chartered Surveyor accredited with a Royal Institution of Chartered Surveyors (RICS) membership.

- 4.34 All extractions carried out to support a scheme measure must follow PAS2035 rules and be lodged with TrustMark, following their EPR conventions. This may include extractions performed before an RdSAP assessment of the property is carried out.

Interaction with funding from other schemes

- 4.35 Funding for measures delivered under the Scheme cannot be blended with funding from other government schemes or grants. Any measures outside of the Scheme delivered to the same property would have to be installed either before or after all of the Scheme measures are installed. This means non-scheme measures that may impact the properties' SAP assessment and the post-retrofit SAP assessment. This requirement includes, but is not limited to, the following schemes referenced below.
- Warm Home Discount
 - Home Upgrade Grant
 - Boiler Upgrade Scheme
 - Social Housing Decarbonisation Fund
 - ECO4
 - Any other local authority or national scheme that funds energy efficiency measures

5. Great British Insulation Scheme measures

Qualifying actions in the scheme

- 5.1 To achieve its Great British Insulation Scheme obligations, a supplier must install measures that qualify under the Scheme and deliver annual bill savings for the household.
- 5.2 The Scheme supports the installation of specific insulation measures. These measure types are set out in this chapter. Where a home receives an eligible insulation measure under the Scheme, secondary (heating controls) measures may also be installed. These are also described in this chapter.
- 5.3 The table below gives a measure overview for all eligible measures under the Scheme and the related rules around tenure and starting SAP rating. This is the “light” version of the Great British Insulation Scheme Measures Table. For detailed information on eligible measures under the Scheme use the standalone version of the table published on our website⁶².

⁶² <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

Table 8: Great British Insulation Scheme measure table

Measure Sub-Category	Tenure			
	Owner Occupied Starting SAP D-G	PRS Starting SAP E-G	Social Starting SAP E-G	Social Starting SAP D
Measure Type				
External/Internal/Hybrid Wall Insulation	✓	✓	✓	No
Cavity Wall Insulation	✓		✓	No
Loft Insulation	✓		✓	No
Pitched Roof Insulation	✓	✓	✓	No
Flat Roof Insulation	✓	✓	✓	No
Room in Roof Insulation	✓	✓	✓	No
Underfloor Insulation	✓	✓	✓	No
Solid Floor Insulation	✓	✓	✓	No
Park Home Insulation	✓	✓	✓	No
Heating controls - Boiler Programmers and Room Thermostat, and Thermostatic Radiator Valves (TRV)		No	No	No

Figure 6: Key for Measure Table 8

Key:
Eligible under certain conditions
Properties in the Social D may only receive innovation measures

Insulation measures

5.4 Under the Great British Insulation Scheme, both the general and low-income group will be eligible for the following insulation measures:

Cavity wall insulation (including party walls)

- 5.5 Insulation of a cavity wall includes the insulation of exterior facing cavity walls and party walls. Cavity walls can be treated with:
- a) Cavity wall insulation (CWI) installed between the leaves of a cavity wall;
 - b) External wall insulation (EWI) installed to the exterior face of the cavity wall; or
 - c) Internal wall insulation (IWI) installed to the interior face of the cavity wall.
- 5.6 If the external or internal face of a cavity wall is treated with EWI or IWI, then an IWI or EWI measure should be claimed (see following subsection).
- 5.7 There are five types of CWI measures in the Great British Insulation Scheme. The first three can only be claimed for CWI measures installed to uninsulated cavities in external walls. The fourth measure type, `CWI_partial_fill`, must be used where CWI is installed to the remaining air gap in a partially filled cavity in an external wall. The fifth measure type, party cavity wall insulation (`PWI_cavity`), may be used where CWI is installed to a party wall of cavity construction.
- 5.8 It is permitted to install more than one type of cavity wall insulation to a home under the Great British Insulation Scheme. Although these must be notified separately for scoring purposes, they count as a single insulation measure.
- 5.9 Where CWI is installed to an uninsulated external cavity wall, the correct measure type must be selected based on the thermal conductivity of the CWI product. The three CWI measure types are differentiated by the thermal conductivity of the CWI:
- `CWI_0.040`
 - `CWI_0.033`
 - `CWI_0.027`
- 5.10 This information should be available on the product's test certificate. The selection should be carried out using Table 9.
- 5.11 CWI should not be installed to walls which already meet current building standards. When considering installing CWI in properties built after 2000, members of the supply chain should be particularly vigilant in confirming that any partially filled cavity walls

do not meet current building standards and do indeed need additional CWI. A measure may be rejected if there is evidence that it has been preceded by an extraction that does not comply with the guidance.

Table 9: Thermal conductivities for CWI

Existing insulation	Measure type	Associated range of thermal conductivity for products (W/mK)
Uninsulated cavity	CWI_0.040	0.035 – 0.045
	CWI_0.033	0.029 – 0.034
	CWI_0.027	< 0.028
Cavity wall partial-fill insulation	CWI_partial_fill	All
Party cavity wall insulation	PWI_cavity	All

- 5.12 A party wall measure can be claimed for each property adjacent to any walls that are treated if all other eligibility criteria are met for all premises. The installer must obtain the necessary consent from all properties adjacent to the wall before the measure is carried out.
- 5.13 Party wall measures cannot be claimed under the Scheme for flats and maisonettes as they are assumed to be constructed to avoid a thermal bypass.
- 5.14 When claiming for multiple adjacent party wall measures, suppliers should ensure that all the party walls in each property are treated, unless there are reasonable grounds for not doing so. For clarity, if consent cannot be obtained this would be reasonable grounds for not completing 100% of the measure, and a reduced POPT would be claimed where this results in less than 67% being treated.

External/Internal/Hybrid Wall Insulation (E/I/HWI)

- 5.15 External, internal, and hybrid wall insulation measures are separated into individual measure types under the Scheme to mirror the annexes in Publicly Available Specification (PAS), however all three use the same approach to partial project scores, as outlined in the following paragraphs.
- 5.16 Hybrid wall insulation (HWI) combines more than one type of wall insulation on a single dwelling. A hybrid approach is most prevalent with external (EWI) and internal wall insulation (IWI) to ensure all external walls are insulated. For example, it may be used where IWI is required on the front façade and EWI is used on the rear, ensuring

the junction between the two systems includes appropriate overlap to avoid thermal bridging. Hybrid wall insulation should be notified when a property is treated with a combination of EWI and IWI.

- 5.17 Due to the substantial differences in the thermal conductivity of different wall substrates and differences in E/I/HWI installations there are more partial project score options than for other ECO measures. The E/I/HWI variants are expressed in terms of U-value change (for example a change in U-value from 2.0 to 0.3). All the partial project score variants are listed in Table 10. The assumed starting wall U-values are shown in the left-hand column and the assumed finishing U-values are shown in the columns on the right.

Table 10: E/I/HWI U-Value variants for partial project scores

Starting wall U-value (W/m ² K)	Finishing wall U- value (W/m ² K)	Finishing wall U- value (W/m ² K)	Finishing wall U- value (W/m ² K)	Finishing wall U- value (W/m ² K)
2.0	0.6	0.35	0.3	0.25
1.7	0.6	0.55	0.3	0.23
1.0	0.6	0.45	0.3	
0.6	0.3	0.24		
0.45	0.21			

- 5.18 To select the correct E/I/HWI partial project score the starting wall U-value should be determined, using the wall type and approximate age of the property in conjunction with the country. Table 11 specifies the starting U-value that should be selected based on wall type and age.

Table 11: Starting U-values of various wall constructions by age and location

Wall Type	England and Wales		Scotland	
	Age	Starting U-Value	Age	Starting U-value
Solid brick	Before 1976	1.7	Before 1976	1.7
	1976 - 1982	1	1976 - 1983	1
	1983 - 1995	0.6	1984 - 1991	0.6
	From 1996	0.45	From 1992	0.45
Cavity as built	Before 1976	1.7	Before 1976	1.7
	1976 - 1982	1	1976 - 1983	1
	1983 - 1995	0.6	1984 - 1991	0.6
	From 1996	0.45	From 1992	0.45
System build	Before 1967	2.0	Before 1965	2.0
	1967 - 1975	1.7	1965 - 1975	1.7
	1976 - 1982	1	1976 - 1983	1
	1983 - 1995	0.6	1984 - 1991	0.6
	From 1996	0.45	From 1992	0.45
Stone	Before 1976	1.7	Before 1976	1.7
	1976 - 1982	1	1976 - 1983	1
	1983 - 1995	0.6	1984 - 1991	0.6
	From 1996	0.45	From 1992	0.45
Cob	Before 1996	0.6	Before 1999	0.6
	From 1996	0.45	From 1999	0.45
Timber frame	Before 1949	2.0	Before 1949	2.0
	1950 - 1966	1	1950 - 1964	1
	1967 - 1975	0.6	1965 - 1975	0.6
	From 1976	0.45	From 1976	0.45
Filled cavity	Before 1976	0.6	Before 1976	0.6
	From 1976	0.45	From 1976	0.45

- 5.19 The finishing wall U-value should be determined using the thickness of external/internal/hybrid wall insulation installed. Each E/I/HWI score in the PPS Matrix assumes a certain thickness of mineral fibre insulation. However, the thickness required to achieve a specified level of thermal improvement will vary depending on the insulation material used.

- 5.20 Table 12 outlines the thickness of insulation required to claim the E/I/HWI partial project score for different materials. Values have been generated using typical thermal conductivities for each material and rounded up to the nearest 10mm in thickness.
- 5.21 The intention of Table 12 is to show that higher performing materials may not require the same depth of insulation. As such, it is not intended to be a definitive guide and the list of materials in this table is non-exhaustive.

Table 12: Minimum insulation thickness required to achieve each U-value change

Deemed Score (U-value change)	Mineral Fibre	EPS 70, 100, 150	EPS 200	Graphite Enhanced EPS	PIR	Phenolic
2 -> 0.6	60	50	40	40	40	30
2 -> 0.35	110	90	90	80	70	50
2 -> 0.3	130	110	100	90	80	60
2 -> 0.25	160	140	120	110	100	80
1.7 -> 0.6	50	50	40	40	30	30
1.7 -> 0.55	60	50	50	40	40	30
1.7 -> 0.3	130	110	100	90	80	60
1.7 -> 0.23	170	150	130	120	100	80
1.0 -> 0.6	30	30	30	20	20	20
1.0 -> 0.45	60	50	50	40	40	30
1.0 -> 0.3	110	90	80	70	70	50
0.6 -> 0.3	80	70	60	50	50	40
0.6 -> 0.24	110	100	90	80	70	60
0.45 -> 0.21	120	100	90	80	70	60

- 5.22 The thickness values in Table 12 are the minimum required to achieve the corresponding U-value change. Therefore, where the E/I/HWI measure has a thickness that is between two values in the table the U-value that corresponds to the lower numbered measurement value should be selected.

- 5.23 The minimum thickness values in Table 12 relate to the insulation material alone. We are aware that the entire insulation system is likely to require additional elements, such as render finish and so the final thickness of the system may be greater than the associated value in the table. Note that this applies even to insulation bonded to plasterboard.
- 5.24 Some insulation systems may not be adequately covered by Table 12, for example because they incorporate multiple materials; a version of a material with significantly different thermal characteristics; or a material not included by the table.
- 5.25 TrustMark's Energy Performance Report (EPR) Conventions⁶³ for use in ECO should be followed for the pre and post retrofit RdSAP assessment. As covered in the Conventions, overridden U-values should not be used, unless via prior agreement with the scheme provider on receipt of suitable evidence.

Loft insulation

- 5.26 Loft insulation (LI) is installed between, and/or on top of, joists. There are two LI measures:
- a) LI where there is less than or equal to (\leq) 100mm pre-existing insulation, or
 - b) LI where there is greater than ($>$) 100mm pre-existing insulation.
- 5.27 Prior to the installation of any loft measures taking place, the installer, operative or assessor, and either the occupier or landlord must sign the pre-existing loft declaration regarding the presence of loft insulation in the property.
- 5.28 A copy of the signed declaration must be left in the loft. The declaration should be fixed in a secure position close to the loft hatch where it can be clearly viewed and is unlikely to be covered up or disturbed, for example on a nearby rafter. The declaration should be legible to somebody who is standing at the top of a ladder entering the loft.
- 5.29 A supplier must retain a copy (or photo) of the signed declaration. We would recommend a clear photo of the loft declaration securely fixed to the loft. We may request this is made available for review, should we have concerns over these requirements being met.
- 5.30 Where loft insulation has previously been claimed under ECO or GBIS, we will request evidence of the date the property owner took ownership of the property – this can

⁶³ Available at <https://www.trustmark.org.uk/tradespeople/quality-assurance-guidance-government-funded-schemes>

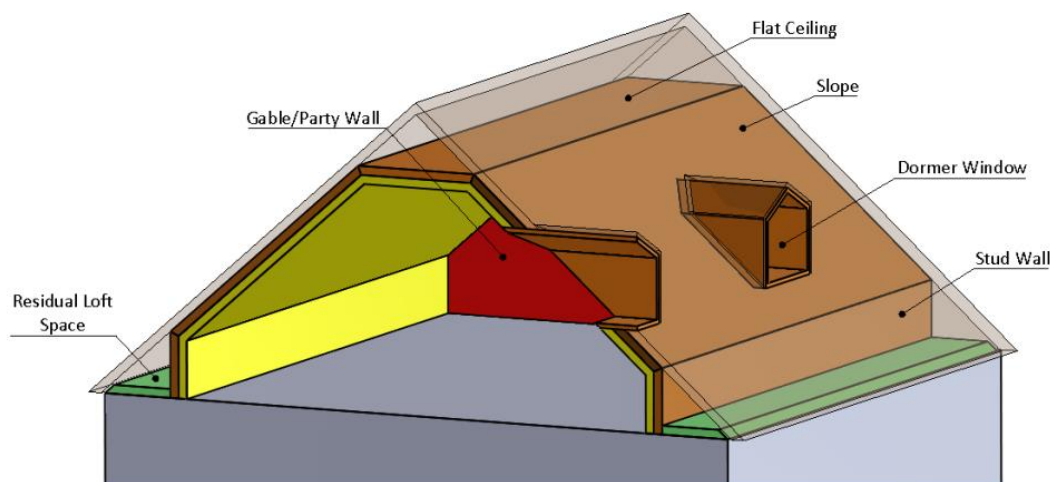
include several items, for example the land deed. If this date precedes the previous ECO loft insulation measure, the latest loft insulation measure will be rejected.

Room-in-roof insulation

- 5.31 The RdSAP convention on 'Roof room/Attics' should be used to determine whether an area is a room-in-roof or a separate storey. This states that for a room-in-roof to be classed as such, the height of the common wall must be less than 1.8m for at least 50% of the common wall (excluding gable ends and party walls). A room-in-roof can be a loft conversion, dormer bungalow/chalet bungalow, or an original storey with a common wall which is less than 1.8m and can be accessed via a permanent fixed staircase.
- 5.32 Where a flat is entirely contained within a room-in-roof, a room-in-roof insulation (RIRI) measure can be claimed for insulating the relevant elements.
- 5.33 Room-in-roof insulation has two measure variants relating to residual loft space: residual area insulated and residual area uninsulated. The residual area is defined as the loft area in the same continuous air space as the room-in-roof. In Figure 7, the residual loft is the area highlighted green, behind the stud walls.
- 5.34 If the installer insulates the residual area to bring it up to building regulations standard, the deemed score for 'room-in-roof insulation - residual area insulated' should be selected. To claim the 'residual area insulated' score, the entire residual area must be insulated as part of the installation.
- 5.35 If the residual area is not insulated, or if it is already insulated prior to the RIRI measure being installed, the 'residual area uninsulated' should be claimed.
- 5.36 For clarity, insulation of the residual loft area should be completed to the same building regulations standards as a typical loft insulation measure.
- 5.37 We expect that all RIRI installations are conducted in line with the government's best practice guidance for RIRI measures.⁶⁴

⁶⁴ <https://www.gov.uk/government/publications/room-in-roof-insulation-ri-ri-best-practice>

Figure 7: Areas in room-in-roof



Pitched roof insulation

5.38 Pitched roof insulation (PRI) is the application of insulation at rafter level to the sloping ceiling of a roof. Pitched roofs can be upgraded by adding insulation between the existing rafters. Insulation can also be added either above or below the rafter zone. Pitched roof insulation should only be applied in lofts with existing habitable rooms which do not meet the criteria for being considered a room in roof,⁶⁵ as well as a vaulted ceiling with no loft space – the installation of pitched roof installation to uninhabited cold loft spaces is not supported under the Great British Insulation Scheme.

Floor insulation

- 5.39 Floor insulation can only be installed to the floor in the property that is either in contact with the ground, above an unheated space (ie a cellar), or suspended and in contact with the outside air.
- 5.40 A floor cannot be treated if there is a room below it that contains a heat emitter such as a radiator.
- 5.41 It is recognised that underfloor insulation (UFI) applied to a suspended floor can be installed using different techniques and requires different skillsets to insulation applied to a solid floor (SFI).⁶⁶ As such we consider them to be different measures, in much the same way as cavity wall and solid walls differ and require different insulation installation techniques.

⁶⁵ Please see RdSAP Conventions for the definition of a room-in-roof

⁶⁶ <http://www.greenspec.co.uk/building-design/ground-floor-insulation/>

- 5.42 Separate scores for both variants, UFI and SFI, exist and should be notified accordingly.
- 5.43 To claim a suspended underfloor insulation measure, we expect that the installation techniques of the UFI measure is in line with the manufacturer's instructions, the prescribed installation methods for the product used, and the government's Guide to Best Practice: Retrofit Floor insulation – Suspended Timber Floors.⁶⁷
- 5.44 We expect that all solid floor insulation installations are conducted in line with the government's guide to best practice ⁶⁸.

Park home insulation

- 5.45 A park home insulation (PHI) measure is the insulation of the walls, ceiling and floor of a park home.

Solid Wall Insulation

- 5.46 Solid wall insulation (SWI) means internal or external insulation of a solid wall (ie internal wall insulation (IWI) or external wall insulation (EWI) respectively). SWI does not include insulation of a mobile home, which is a separate eligible scheme measure.⁶⁹
- 5.47 A solid wall can be a solid brick wall or a solid non-brick wall (including stone walls). The types of non-brick wall covered by the definition of solid wall include metal or timber frame walls, and walls of prefabricated concrete construction. There are no distinct measure types for different types of solid walls. The same set of deemed scores applies for both solid brick and solid non-brick wall properties. The types of solid wall may have different starting U-values as per Table 11.
- 5.48 Although most system build properties meet the definition of solid wall, some have external walls of a standard cavity construction and require a cavity wall insulation measure. The construction type of the external walls of a system build property should therefore be assessed prior to insulating the property as it will not automatically be considered a solid wall.

⁶⁷ Further specific information on the installation of suspended UFI can be found in the BEIS Guide to Best Practice: Retrofit Floor insulation – Suspended Timber Floors: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/898872/suspended-timber-floors-underfloor-insulation-best-practice.pdf

⁶⁸ The guide is available at: <https://www.gov.uk/government/publications/solid-floor-insulation-sfi-best-practice>.

⁶⁹ Article 2 of the ECO4 Order.

- 5.49 Please note that we expect that all IWI installations are conducted in line with Department for Energy Security and Net Zero's guide to best practice for retrofit internal wall insulation.⁷⁰

Secondary measures

- 5.50 This section details the secondary measures that can be installed in households in the low-income eligibility group under the Scheme. Secondary measures are heating control measures and can only be installed if an insulation measure is first installed to the home.
- 5.51 The installation of smart thermostats⁷¹, time and temperature zone control (TTZC), and compensation are not eligible measures under the Great British Insulation Scheme.

TRVs and boiler programmer & room thermostats

- 5.52 There are two secondary measure types:
- a) thermostatic radiator valves (TRVs)
 - b) Boiler programmer & room thermostat
- 5.53 A home may receive both measures where required; it is not limited to only one.
- 5.54 Where a pre-installation RdSAP assessment records a full set of functioning TRVs, boiler programmers and room thermostats, the secondary heating measures cannot be claimed. This applies even where the heating controls are broken. This is because there is no cost saving associated with the replacement of existing heating measures.

Insulation requirements for secondary measures

- 5.55 All heating controls installed under the Great British Insulation Scheme are called secondary measures. Secondary measures are only eligible for installation where an eligible insulation measure has first been installed in the same property under the Scheme, referred to as the primary insulation measure. Multiple secondary measures may be installed at one property supported by a single primary insulation measure.

⁷⁰ <https://www.gov.uk/government/publications/retrofit-internal-wall-insulation-best-practice>

⁷¹ Where a home requires a boiler programmer and room thermostat, an installer may choose to install a smart thermostat instead, but this can only be notified as a programmer and room thermostat and no additional score will be awarded.

- 5.56 The primary insulation measure must have been completed before a secondary measure. Secondary measures must be completed on the same day or after, but no more than three months after, the date of completed installation of the primary insulation measure. Heating control measures installed beyond this deadline will not be eligible. The normal notification deadline for measures applies.
- 5.57 To demonstrate the timings for secondary measures, suppose an eligible insulation measure was completed on 23 March 2024. A secondary measure is completed:

Date	Eligibility
On the 22 March, before the insulation	Ineligible
On the 23 March, the same day as the insulation	Eligible
On the 23 June, 3 months after the insulation	Eligible
On the 24 June, over 3 months after the	Ineligible

- 5.58 Secondary measures will not be considered qualifying actions unless the primary insulation measure is also a qualifying action. If the primary insulation measure is rejected, all secondary measures in the property could be rejected.
- 5.59 Secondary measures must be promoted by the same supplier that promoted the primary insulation measure, and also be notified to the same license.

Smart Meter Advice

- 5.60 A smart meter is a digital electricity and gas meter which displays accurate energy usage readings in near real time.
- 5.61 The Government does not intend to mandate the installation of smart meters because the decision to accept the offer of a smart meter rests with the consumer. However, mandating smart meter advice⁷² provides for the overall market-wide roll out of smart meters. This advice must take the form of giving the customer a leaflet, either physically or electronically, produced by Smart Energy GB.⁷³

⁷³ The leaflet can be found in the following link: <https://www.smartenergygb.org/resource-centre/materials/2022-core-assets/a-smart-meter-could-give-you-peace-of-mind-if-money-s-tight/a-smart-meter-could-give-you-peace-of-mind-if-money-s-tight-leaflet-in-english>

- 5.62 This advice must be provided prior to the installation of the first measure within the retrofit. We would recommend that this advice is given by the Retrofit Coordinators part of the wider retrofit advice given at the beginning of the assessment start. This advice can be given either electronically or in print.
- 5.63 The provision of this advice will have to be confirmed by the Retrofit Assessor as part of a declaration during the lodgement of the measure in the TrustMark Data Warehouse.

Standards for the installation of measures

- 5.64 Suppliers should ensure that the installation of a measure is carried out in accordance with the relevant standards.
- 5.65 The installation under the scheme measure should be carried out:
- a) By a PAS installer, or under the responsibility of, a person certified to PAS2030:19.
 - b) In accordance with relevant provisions of PAS 2030:2019, PAS2035:2019 building regulations and any other applicable regulations.
- 5.66 TrustMark is responsible for ensuring compliance with PAS and that appropriate guarantees are in place. Measures installed according to PAS must be installed by, or under the responsibility of, a person who is registered with TrustMark for the purposes of that measure. These requirements are evidenced to Ofgem by a Certificate of Lodgement (CoL) awarded by TrustMark for measures.
- 5.67 An 'operative' is defined in PAS 2030:2019 as a "person employed by the Retrofit Installer, either directly or under a subcontract arrangement, to undertake installation tasks on an energy efficiency measure in accordance with the relevant method statement".⁷⁴ There are two categories of operative permitted under the provisions of this PAS, those who can demonstrate vocational competence and those who are acquiring vocational competence.
- 5.68 Individuals employed to provide labouring, carrying, or loading/unloading capability do not constitute operatives in the terms of this PAS. In such cases, it is the PAS-certified installation company who remains responsible for any work carried out.
- 5.69 TrustMark registered businesses must be certified as compliant with PAS 2030:2019 by a PAS 2031:19 accredited scheme provider or certification body. All installers

⁷⁴ See PAS 2030:2019 paragraph 3.12

registered with TrustMark must deliver energy efficiency measures within the scope of PAS 2035:2019 and PAS 2030:201975. Furthermore, the measures delivered under the PAS 2035 include:

- loft insulation
- park home insulation
- room – in – roof insulation
- cavity wall insulation
- solid wall insulation
- pitched roof insulation
- flat roof insulation
- under floor insulation

5.70 As set out in TrustMark’s Framework Operating Requirements this approach will provide robust guarantee requirements for measures and increased protection where possible.

TrustMark Equivalence

5.71 All measures must be installed by, or under the responsibility of, a relevant TrustMark registered installer and received a TrustMark certification of lodgement. The ECO4A Order also allows measures that are “subject to arrangements for quality assurance and consumer protection, including arrangements for repairs and other remedies, which are equivalent to the requirements under TrustMark”. Please contact Ofgem for further information on this route.

Guarantees

5.72 Guarantee requirements and standards will be mandated by TrustMark via their registration and compliance. Any measure lodged with TrustMark that does not meet

⁷⁵ See TrustMark Framework Operating Requirements
<https://www.trustmark.org.uk/tradespeople/government-grants-schemes-and-subsidies>

relevant guarantee requirements, enforced via TrustMark, will not be considered a qualifying Great British Insulation Scheme measure.

- 5.73 Appropriate guarantees, which have been reviewed and are considered to meet the TrustMark Framework, are listed on TrustMark's website.⁷⁶
- 5.74 Suppliers will not need to supply us with the guarantee codes as part of the Great British Insulation Scheme notification template.
- 5.75 All IMs should be provided with a TrustMark or equivalent guarantee. Equivalence here will be subject to a letter of direction from Government. We recommend that suppliers contact us at ECO@ofgem.gov.uk prior to seeking to install such measures.

⁷⁶ <https://www.trustmark.org.uk/tradespeople/financial-protection>

6. Scores

Introduction to Great British Insulation Scheme scores

- 6.1 Measures installed under the Great British Insulation Scheme receive a score which is the contribution that the measure makes towards a supplier's obligation. Throughout the Scheme Ofgem will collate scores, and at the end of the Scheme Ofgem will add up the scores for all approved measures to determine whether suppliers have met their obligations.
- 6.2 The Great British Insulation Scheme makes use of the partial project scores framework from the ECO4 scheme.⁷⁷ The scores represent the annual cost saving achieved by a measure when installed in a domestic premises. Information on how the scores were produced was published as part of the ECO4 scoring methodology consultation.⁷⁸
- 6.3 The base score for a measure is determined using the Great British Insulation Scheme scores matrix. The relevant score for a given installation can be identified in the matrix using the measure type along with the home's intermediate SAP band and floor area segment. The main heat source of the home is also required in the case of secondary measures. Calculations are applied to the base score if less than 67% of the property is treated by the measure or if an uplift applies. An uplift is a % multiplier added to the score of a measure under specific circumstances.
- 6.4 Suppliers provide the necessary information for determining a measure's score when they notify the measure to us, they do not calculate the score. The score is then determined by the Scheme Register and added to the notification automatically.

Pre-retrofit RdSAP assessment

- 6.5 Before a home receives measures under the Great British Insulation Scheme, a pre-retrofit RdSAP assessment must be carried out. The SAP rating and floor area determined by this assessment are used to obtain the intermediate SAP band and floor area segment.
- 6.6 Any RdSAP assessments produced for PAS retrofits should be lodged, as PAS requires, in TrustMark's Data Warehouse. RdSAP assessments must be carried out using RdSAP

⁷⁷ Scores in the Great British Insulation Scheme do not require the 20% deflator that is applied to partial project scores under ECO4.

⁷⁸ Information on how the scores were calculated can be found in our consultation on the ECO4 scoring methodology, and the associated decision document: <https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-consultation-scoring-methodology-part-1-and-2-decision>

2012 v9.94. RdSAP 10 may be adopted in future, subject to a relevant amendment of the Scheme legislation.

- 6.7 Trustmark require that an updated RdSAP assessment should be carried out at the end of the retrofit. However, this is not used to inform the score for the retrofit.

Intermediate SAP bands

- 6.8 In an RdSAP assessment, the energy efficiency rating of a domestic premises is expressed by assigning it a band from A to G. The band is determined by the SAP rating, which is a numerical value, normally between 1 and 100, based on the calculated energy costs for the premises. Higher ratings indicate better energy efficiency. A rating between 1 and 20 relates to band G, 21 to 38 relates to F and so on.
- 6.9 The Great British Insulation Scheme scores are based on intermediate SAP bands, which divide SAP bands into a 'low' and a 'high' category.
- 6.10 Although SAP ratings are usually rounded to a whole number, the intermediate SAP bands give ratings to one decimal place. These intermediate SAP bands and their corresponding SAP rating range are given in Table 13 below.

Table 13: SAP ratings and corresponding intermediate SAP bands

SAP rating	Intermediate SAP band
Below 10.5	Low G
10.5 to 20.4	High G
20.5 to 29.4	Low F
29.5 to 38.4	High F
38.5 to 46.4	Low E
46.5 to 54.4	High E
54.5 to 61.4	Low D
61.5 to 68.4	High D
68.5 to 74.4	Low C
74.5 to 80.4	High C
80.5 to 85.9	Low B
86.0 to 91.4	High B
91.5 to 95.9	Low A
96.0 and above	High A

Total floor area segments

- 6.11 The size of a premises has a significant impact on energy costs and savings; therefore Great British Insulation Scheme scores are also based on the total floor area of the premises.
- 6.12 Premises can be divided into four distinct floor area segments, based on the total floor area range of the property.
- 6.13 The floor area of the premises should be determined in accordance with SAP/RdSAP conventions. The floor area should not change between the pre-retrofit and post-retrofit assessment.
- 6.14 Note that it is the internal total floor area which must be used. RdSAP allows assessors to enter external dimensions, and the software automatically makes allowances for wall thicknesses in calculating the internal total floor area. Floor area should therefore always be taken from the SAP/RdSAP assessment output, rather than manually calculated using input dimensions.

Table 14: Floor area segments

Floor area segment	Total floor area (TFA) range
1	$\text{TFA} < 73\text{m}^2$
2	$73\text{m}^2 \leq \text{TFA} < 98\text{m}^2$
3	$98\text{m}^2 \leq \text{TFA} < 200\text{m}^2$
4	$200\text{m}^2 \leq \text{TFA}$

- 6.15 Score uplifts are automatically applied to the two smallest floor area segments (segment 1 and 2 in Table 14). These uplifts are already accounted for in the scores shown in the published scoring matrix.

In-Fill

- 6.16 Scores awarded to in-fill measures will contribute to the general group component of suppliers' obligations.

Identification of the heating source for secondary measures

- 6.17 Where a secondary measure is installed, the premises' heating source must be identified to determine the correct score for the measure. The heating source is the central heating system to which the secondary measures are installed and whose output they control.

- 6.18 The Scores Matrix provides scores for common heating sources used across the Great British housing stock. The heating sources used for the scores are given in Table 15.

Table 15: Heating sources for secondary measures

Heating sources
Condensing Gas Boiler
Non-Condensing Gas Boiler
Non-Condensing Liquified Petroleum Gas (LPG) Boiler
Condensing LPG Boiler
Non-Condensing Oil Boiler
Condensing Oil Boiler
Electric Boiler
Solid Fossil Boiler
Air to Water Air Source Heat Pump (ASHP)
Ground Source Heat Pump
District Heating System Non-Combined Heat and Power
District Heating System Combined Heat and Power
Bottled LPG Boiler

Proxies

- 6.19 Proxies are used for rare heating sources for which there is no score available.
- 6.20 Where a supplier installs a measure and the heating source is not reflected in the scores Matrix, Table 16 is used to determine which heating source is used as a proxy for the actual heating source.
- 6.21 Please note that Table 16 is for reference only. Suppliers must notify the actual heating source listed rather than the proxy. The proxy will be automatically assigned within the Register based on Table 16, to allow the correct partial project score to be awarded.

Table 16: Proxies for rare heating sources

Actual heating source	Proxy
ASHP/Oil Boiler Hybrid	Air to Water ASHP
ASHP/Gas Boiler Hybrid	Air to Water ASHP
Biomass/Wood Central Heating	Condensing LPG boiler
Bottled LPG Back Boiler to Radiators	Electric Boiler
Bottled LPG Range Cooker Boiler	Electric Boiler
Gas Range Cooker Boiler	Condensing Oil Boiler
LPG Back Boiler to Radiators	Bottled LPG Boiler
LPG Boiler - Special Condition 18	Condensing Gas boiler
LPG Range Cooker Boiler	Bottled LPG Boiler
Oil Range Cooker Boiler	Condensing LPG Boiler
Solid Fossil Back Boiler to Radiators	Non-Condensing Oil Boiler

- 6.22 Where a heating source is identified which is not included in the Scores Matrix or Table 16, suppliers should contact Ofgem to determine the most appropriate course of action.

Percentage of property treated (POPT)

- 6.23 The published scores⁷⁹ take into consideration that it is often not possible to treat 100% of a property when a particular measure is installed.
- 6.24 On average across the housing stock, for most measure types, less than 100% of the property is treated. An average percentage of property treated has been developed for each different measure type.
- 6.25 In the measure notification, suppliers must include the POPT. If it is larger than 67%, this can be notified as “67+” and the published PPS will be awarded.
- 6.26 Where less than 67% of the property is treated, suppliers need to notify the exact POPT. The score will be calculated using the exact POPT. This calculation is explained in paragraph 6.28. Suppliers do not need to notify Ofgem of the score for the measure – this will be calculated and awarded by the Great British Insulation Scheme Register.

⁷⁹ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

Percentage of property treated calculation

6.27 POPT is determined using the formula below:

$$\text{POPT} = \frac{A}{C} \times 100$$

Where:

A is the area that the measure is installed to, and

C is the total 'similar' area of the property:

- For EWI, IWI and CWI, this is the total heat loss wall area
- For party wall insulation, this is the total party wall area
- For roof insulation, loft insulation and room-in-roof insulation, this is the total roof area
- For heating control measures, this is the total floor area of the property that should be heated.

Scores awarded where POPT is less than 67%

6.28 The PPS are published with the average POPT already applied. Where the actual POPT is less than 67%, the published partial project score will be divided by the average POPT, then multiplied by the actual POPT to give the correct value.

6.29 The score awarded for the measure will be calculated by the register using the formula:

$$\frac{\text{Published PPS}}{\text{Average POPT}} \times \text{Actual POPT} = \text{Awarded PPS}$$

Where:

- Actual POPT is the percentage of property treated by the measure, and

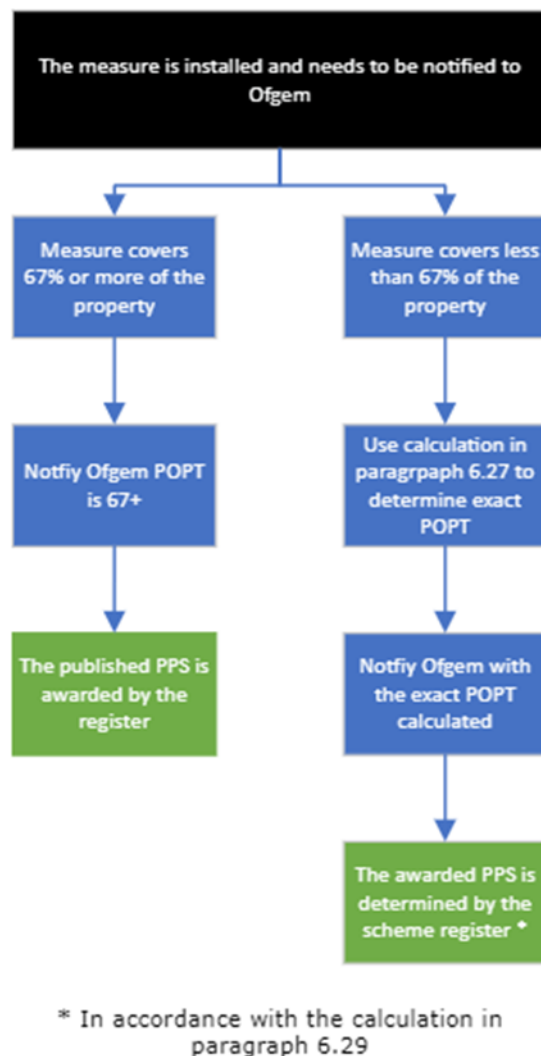
- Average POPT is the average POPT factor which applies to the measure, which is listed in the PPS matrix.

- 6.30 For example, consider an EWI measure installed to a property with a starting intermediate SAP band of low F and with a total floor area <73m². The walls of the property are of both cavity and solid construction, meaning that 50% of the wall area is cavity wall and the other 50% is solid wall. The cavity wall is already fully insulated, and as part of the Great British Insulation scheme retrofit EWI is installed to the solid wall. The actual POPT for the EWI measure is 50%, which is below the 67% threshold.
- 6.31 The average POPT for EWI measures is 95%, written as 0.95 in the scores matrix. The score for this measure, from the scores matrix, is 128. Therefore, the score for this example is:

$$\frac{128}{0.95} \times 0.5 = £67.37$$

- 6.32 Actual POPT, when expressed as a percentage (eg for notifications), should be rounded to the nearest whole number. For example, where 50.3% of a property is treated by a measure, then 50% in notifications and 0.50 will be used in calculations.

Figure 8: POPT flowchart



Measure-specific POPT principles

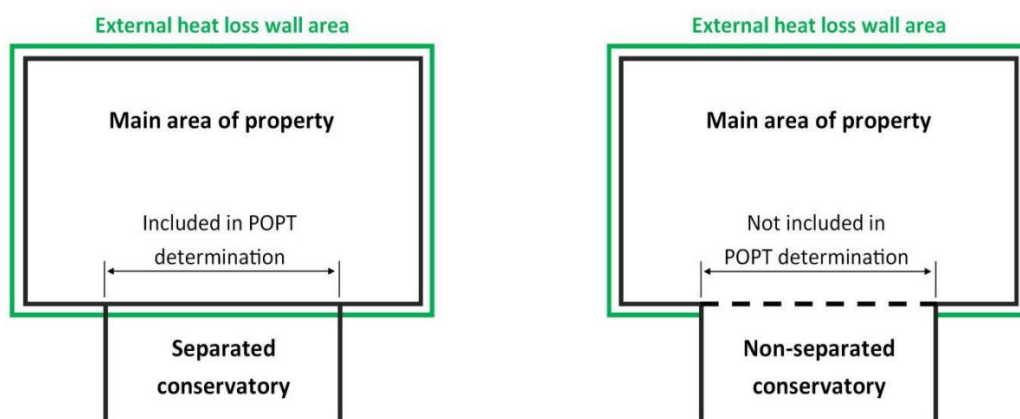
6.33 When calculating POPT, there are some general measure-specific principles which should be taken into account.

Wall insulation

6.34 For wall insulation, POPT is 100% when the total external heat loss wall area of the property is insulated as part of the measure. It should be noted that the wall(s) of a flat which are adjacent to a corridor may be considered as an external heat loss wall for the purposes of determining the POPT.

- 6.35 If the measure does not insulate all external heat loss wall areas, the POPT would be less than 100%. If the POPT is at least 67%, the published score will be awarded without modification. However, if it is less than 67%, the score will be calculated in accordance with paragraph 6.28.
- 6.36 Where some of the external heat loss wall area is already fully insulated prior to the installation of a Great British Insulation scheme wall insulation measure, the percentage of the previously insulated wall should be removed from the POPT.
- 6.37 Where some of the external heat loss wall area cannot be insulated as part of the installation, the percentage of that wall area should be removed from the POPT. For example, when installing a cavity wall insulation measure, any solid wall area of the property should be removed from POPT. It also includes areas relating to chimneys, where the chimney forms part of the external heat loss wall area.
- 6.38 For CWI installations, if a property has cavity walls which are partially covered by cladding, tiles or wooden panelling, these areas must be insulated where possible, either by using a lance, internal drilling, or by removing and replacing exterior cladding. If these areas are of solid wall construction, then they should be removed from the POPT.
- 6.39 The wall area of separated conservatories (those which are accessible via an external quality door) is not included in this determination. In this case, the wall area between the conservatory and the main part of the property is considered to be the external heat loss wall and should be insulated.

Figure 9: POPT diagram for properties with fully glazed conservatories



- 6.40 Where a property has a non-separated conservatory (with an internal quality door), the wall area between the main part of the property and the non-separated conservatory is not considered to be an external heat loss wall and should not be included in the POPT determination. Both scenarios are shown in Figure .
- 6.41 Where a non-separate conservatory has one or more full-height walls, these are considered external heat loss walls and therefore should be included in the POPT determination.
- 6.42 There may be some cases where non-separate conservatories have partial wall areas which could be insulated, such as dwarf walls. Because savings are likely to be negligible in such cases, we do not require dwarf walls of conservatories to be considered when calculating POPT.
- 6.43 Where a property has a garage that is not thermally separate from the dwelling, the wall area of the garage is considered part of the external heat loss wall.
- 6.44 Where a property has a garage that is thermally separate from the dwelling, the outer walls of the garage are not considered as part of the external heat loss wall. The wall area between the main property and garage is considered part of the external heat loss wall.

Examples of calculating POPT for wall insulation

Table 17: Examples of POPT calculations for wall insulation

Scenario	POPT approach
Example 1: all of a property's external heat loss walls are cavity walls and they are all treated with CWI.	100% of the property has been treated. POPT can be notified as "67+" and the published score will be awarded without modification.
Example 2: a property has solid walls with a total heat loss wall area of 50m ² and is to be treated with EWI. One wall with an area of 15m ² is tile hung and cannot be treated.	POPT is 70%. This still meets the 67% requirement, POPT can be notified as "67+" and the published score will be awarded without modification.
Example 3: an uninsulated property has a total heat loss wall area of 50m ² , of which 15m ² is of cavity wall construction and 35m ² is solid wall.	<p>a) If the total external heat loss cavity wall area is treated with CWI, the POPT for the CWI measure is 30%. This is below the 67% requirement. Therefore, the exact POPT must be notified, and the score awarded will be calculated in accordance with paragraph 6.29.</p> <p>b) If 20m² of the available 35m² of the solid walls is insulated, the POPT for the SWI measure is 40%. This does not meet the 67% requirement. The exact POPT must be notified, and the score will be calculated in accordance with paragraph 6.29.</p> <p>c) If the total area of solid wall is insulated, the POPT for the SWI measure is 70%. This meets the 67% requirement and the published score for the relevant SWI measure will be awarded without modification. POPT can be notified as "67+".</p>

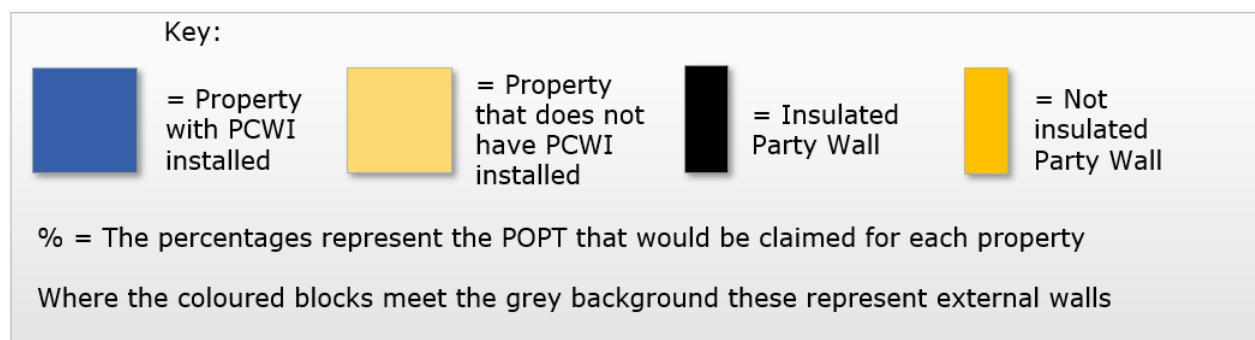
Party cavity wall insulation (PCWI)

- 6.45 For party cavity wall insulation, 100% POPT is the insulation of all party cavity walls. POPT should be calculated based on the area of the party cavity walls that has been insulated, divided by the total area of party cavity wall.
- 6.46 Suppliers should ensure that all the party walls in each property are treated, unless there are reasonable grounds for not doing so. For clarity, if consent cannot be obtained, this would be reasonable grounds for not completing 100% of the measure.
- 6.47 If all the party walls in a property are treated, this counts as both 100% for POPT. As with other measures, if POPT is 67% or more then the published score will be awarded without modification.

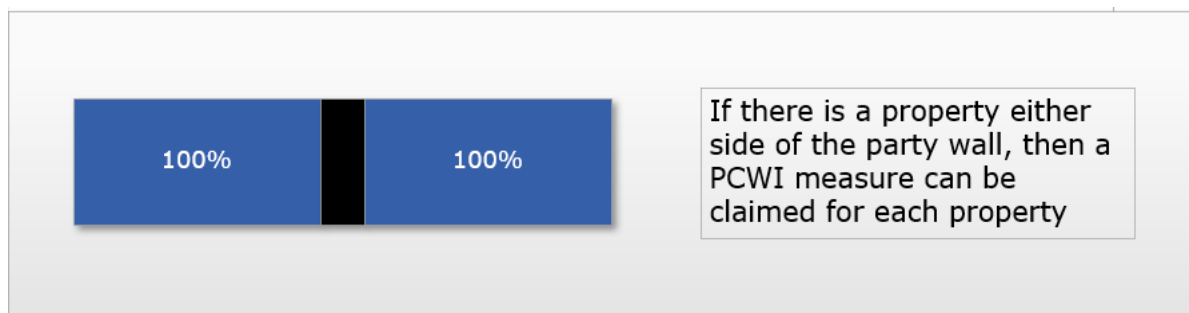
Examples of calculating POPT for PCWI measures

- 6.48 The examples of PCWI installations in Figure show how the POPT changes depending on the number of party walls which have been insulated.

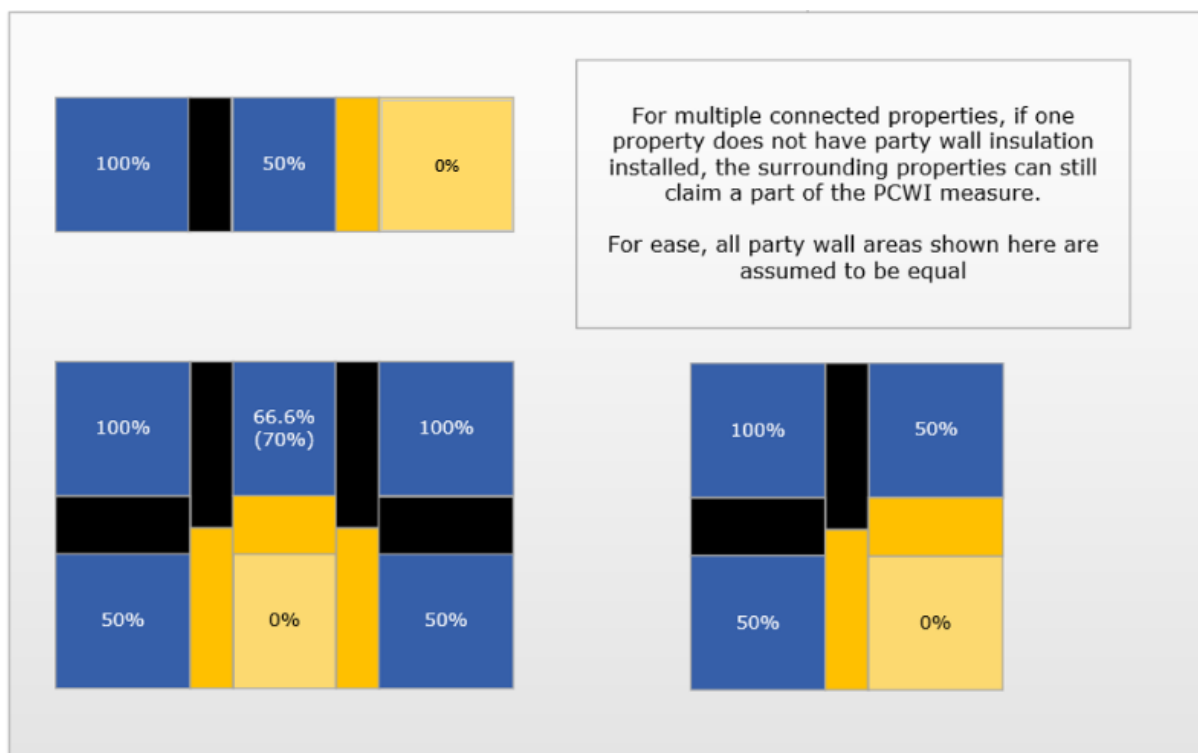
Figure 10: Examples of calculating POPT for PCWI measures



Example 1:



Example 2:



Loft insulation

6.49 Where part of a loft has already been insulated, the area with no pre-existing insulation can be claimed as loft insulation $\leq 100\text{mm}$. Percentage of property treated should be reduced accordingly. If the pre-existing insulation has a depth of equal to or less than 100mm, any additional insulation installed in these areas can be claimed as part of the same measure (LI $\leq 100\text{mm}$) as the area with no pre-existing insulation. If the pre-existing insulation has a depth greater than 100mm and further insulation is installed, this area should be claimed as a measure (LI $> 100\text{mm}$) and the POPT reduced accordingly.

6.50 For example, prior to installation 30% of the loft area is uninsulated, 30% is insulated to a depth of 100mm, and 40% is insulated to a depth of 200mm. If the entire loft area is fully insulated, two measures can be claimed – one LI $\leq 100\text{mm}$ measure with a POPT of 60%, and one LI $> 100\text{mm}$ measure with a POPT of 40%.

Roof insulation

6.51 For roof insulation, POPT is considered to be 100% when the entire heated area of the property has received roof insulation. If the measure does not insulate some heated area of the property, the POPT would be less than 100% as only a proportion of the

property is treated as part of the measure. As with other measure types, the exact POPT needs to be notified and published score will be modified if the 67% requirement is not met.

- 6.52 When calculating POPT for a roof insulation measure, the plan area (ie the footprint) of the roof should be used. Where a property has multiple roof types, for example a pitched roof and a flat roof, the area of all roof types should be taken into account when calculating POPT. Where part of the heated area of the property is not the top storey of a building, for example a ground floor flat with a single storey extension at the rear, this must also be taken into account and POPT reduced proportionately.
- 6.53 When installing additional insulation to a roof area which is already partially insulated, where the existing insulation does not meet the relevant standards, the POPT does not need to be reduced.
- 6.54 The roof area of conservatories (separated or non-separated) should not be included in the determination of POPT.
- 6.55 The roof area of a garage should only be included in the determination of POPT where the garage is not thermally separated from the main property.
- 6.56 It should be noted that where a property has a mansard roof, the sloped area should be considered as roof area if the slope is at an angle of less than 70°. If the angle is more than 70°, it is considered to be a wall and should not be considered as part of the roof area. If a sloped area with an angle of more than 70° is being insulated, the score should be determined using the process for external/internal wall insulation from paragraph 5.15 onwards. The wall type will generally be timber frame.
- 6.57 Calculating POPT for room-in-roof insulation (RIRI) is more complex than other roof insulation measures and involves two separate considerations:
- a) If a property has a single roof space containing a room-in-roof (RIR), the maximum POPT would be 100%. If a property has multiple roof spaces, the percentage of roof area which is made up of the RIR should be considered. In these cases, the maximum POPT for a RIRI measure is less than 100%.
 - b) The percentage of the RIR insulated, not including the residual loft area. Where this is less than 100%, the POPT calculated in a) should be scaled down. Paragraph 6.51 explains what is considered to be 100% of a RIRI measure.
- 6.58 The residual area of a RIR is considered as the residual loft area contained within the same roof as a RIR. To be considered as being in the same roof, it should share the

same continuous air space. Generally, a common or stud wall, rather than a masonry wall, would separate the RIR from the residual loft areas. Roof areas separated by masonry walls are considered to be separate roofs for this determination.

- 6.59 The determination of the residual area is the same regardless of whether the RIR 'residual area insulated' score or the RIR 'residual area uninsulated' score is being claimed. To claim the 'residual area insulated' score, the entire residual area must be insulated.
- 6.60 If there is no residual lost area surrounding the RIR, the 'residual area insulated' score should be claimed.
- 6.61 The party wall always counts towards the POPT. However, where it is a solid wall adjacent to a heated space, this would be accepted as reasonable grounds for not completing 100% of the measure (ie it could be left uninsulated, but the POPT would need to be reduced accordingly).

Examples of calculating POPT for roof insulation

- 6.62 Table 18 presents examples of calculating POPT for roof insulation for dwellings with different roof constructions.

Table 18: Examples of POPT calculations for roof insulation

Scenario	POPT approach
Example 1: where the total heated area of the property has a roof of one type and this is fully insulated using one measure, for example loft insulation or flat roof insulation.	POPT is 100%.
Example 2: a property has a total roof area of 100m ² , where 28m ² is flat roof and 72m ² is pitched roof. ⁸⁰	<ul style="list-style-type: none"> Where the property has multiple roof types, for example a flat roof and a pitched roof, all roof areas should be taken into account when calculating POPT. If the entire flat roof was insulated, the POPT would be 28%. This does not meet the 67% requirement, therefore the exact POPT should be

⁸⁰ For the purposes of calculating POPT for roof insulation measures, roof areas should be measured in the horizontal plane ie the area of a pitched roof is equal to the area of floor beneath it.

	<p>notified, and the score awarded will be modified to reflect this.</p> <ul style="list-style-type: none"> The area covered by the pitched roof is 72m² of the total 100m² roof area. If the pitched roof is fully insulated, the POPT will be 72%. This meets the 67% requirement, therefore the exact POPT is not required, and published score will be awarded without modification.
Example 3: a ground floor flat has a single storey extension which comprises 20% of the heated area of the property.	<ul style="list-style-type: none"> If the extension roof is insulated, the POPT would be 20%. This does not meet the 67% requirement, and notification of the measure should include the exact POPT, and the score awarded will be calculated in accordance with paragraph 6.29.
Example 4: a property with a single pitched roof of 80m ² containing an RIR with a floor area of 20m ² .	<ul style="list-style-type: none"> If only the loft area surrounding the RIR is insulated (ie as a loft insulation measure), the POPT would relate to the loft area insulated, which is 60m² of the total 80m² roof area. This is 75% of the overall roof area which meets the 67% requirement, therefore the exact POPT is not required, and the published score will be awarded without modification. This applies when only loft insulation is being carried out and the RIR is not insulated.
Example 5: a property has a single pitched roof containing a RIR.	<ul style="list-style-type: none"> If all elements of the RIR are insulated but the residual area is not, the measure type is 'room-in-roof insulation – residual area uninsulated'. POPT are 100%. This meets the 67% requirement, therefore the exact POPT is not required, and the published score will be awarded without modification. If the residual area is insulated, the deemed score for 'room-in-roof insulation – residual area insulated' should be selected. If, in either of the above examples, only 63% of the RIR is insulated, then POPT in this case is

	63%. This does not meet the 67% requirement. The exact POPT should be notified, and the score awarded will be modified to account for this.
Example 6: a property has two roofs, where one is a pitched roof containing a RIR and the other is a flat roof. The total roof area is 100m ² , of which the pitched roof containing the RIR has a plan area of 72m ² , which includes any residual areas, and the flat roof has a plan area of 28m ² .	<ul style="list-style-type: none"> • If a RIRI measure installed, the percentage of the overall roof area of the RIR must first be considered, which in this case is 72%. • If all elements of the RIR are insulated but the residual area is not insulated, the score for 'room-in-roof insulation – residual area uninsulated' should be selected. POPT in this case is 72%. This meets the 67% requirement and therefore the exact POPT is not required, and the published score will be awarded without modification. • If the residual area is insulated and all elements of the RIR are insulated, the score for 'room-in-roof insulation – residual area insulated' should be selected. POPT is also 72%. • If, in either of the above examples, only 80% of the RIR is insulated. The POPT is 80% of 72%, which is 58%. This does not meet the 67% requirement, and the exact POPT should be notified, and the score awarded will be modified to account for this.

Secondary measures

- 6.63 Where a programmer and room thermostat measure are installed, the POPT is the percentage of the home heated by the heating system the measure controls. If a home already has a programmer and only a room thermostat is installed, the measure may still be claimed and POPT calculated as above – the same applies if only a programmer is required. However, where both are installed, only one measure may be notified.
- 6.64 Where thermostatic radiator valves (TRVs) are installed, POPT should reflect the proportion of the home heated by the radiators receiving TRVs.

Building Extensions

- 6.65 Great British Insulation Scheme measures cannot be delivered to an unfinished new build extension. If a measure is installed to a property that had an on-going new build extension, then the measure can only be claimed for the existing part of the property. The percentage of property treated must be reduced accordingly. See Percentage of property treated section for more information.
- 6.66 For example, where flat roof insulation is installed to a property with a flat roof, but 20% of the roof area is part of an unfinished extension, the POPT must be reduced by 20%. This would only affect the score if POPT is reduced below the 67% requirement.

Innovation Measures

- 6.67 An innovation uplift may be awarded to measures that can demonstrate an improvement over comparable measures⁸¹ currently deliverable under the Great British Insulation Scheme.
- 6.68 Innovation measures must first be eligible under the ECO4 scheme to be installed in the Great British Insulation Scheme. Following a successful application, a description of the IM will be published, and a score uplift can then be awarded to products meeting that description.
- 6.69 Innovation uplifts will only be awarded for measures within the low-income group and/or delivery to social housing band D.
- 6.70 IM uplifts carried over from ECO3 or awarded under the New Measures and Products (NMAP) innovation pathway, under ECO4, will be retained under the Great British Insulation Scheme. Under this approach, notification of a standard innovation measure will accrue a 25% uplift, and notification of a substantial innovation measure will accrue a 45%.
- 6.71 This uplift can either be 25% or 45% depending on the size of the improvement over the standard measure and applies only to low-income group measures. Please note that applications must include the specific product(s) that the applicant intends to promote as an IM. Measures delivered under this route are capped.
- 6.72 The general IM cap will be set as 10% of a supplier's total low-income minimum obligation, with an IM specific cap being retained at 5% of each supplier's obligation, which could be altered through trades.

⁸¹ **Article 32** of the ECO4 Order – Comparable measures means measures that would otherwise be promoted by the participant and are commonly available on the market in Great Britain.

- 6.73 Innovation measures are fully optional, and suppliers are not obliged to deliver any to complete their Great British Insulation Scheme obligations.
- 6.74 The innovation uplift is capped at 10% of a supplier's low-income group obligation. The value that counts towards this cap is the base score of the measure + the innovation uplift. Innovation measures that breach this cap will lose the uplift but will remain as eligible measures and keep the rest of the score.
- 6.75 For more details on the innovation application process see our ECO4 guidance on new measures and products⁸²

Uplifts

- 6.76 An uplift is a % multiplier added to the score of a measure under specific circumstances. There are three uplifts available in Great British Insulation Scheme. A measure may receive more than one uplift. With the exception of the floor area uplift, uplifts are applied to the base score of the measure and do not include other uplifts in their calculation. The available uplifts are summarised below and also in Table 21.
- 6.77 The uplifts available in the Great British Insulation Scheme are:
- 1) The off-gas rural uplift. Measures installed in a property that is both off-gas and in a rural area in Scotland or Wales will receive a 20% uplift. This applies only to measures in the low-income group.
 - 2) The Innovation measure uplift. Certain approved innovation measures may receive either a standard innovation (25%) or substantial innovation (45%) uplift. This will depend on the uplift awarded to the innovation measure application. This uplift applies only to measures in the low-income group.
 - 3) Floor area uplifts. These uplifts apply to any scores awarded to measures installed in properties in the smallest two floor area segments (see Table 14). These uplifts are already applied to all relevant scores in the published matrix. Suppliers do not need to calculate this uplift or submit any additional notification. The uplifts will be automatically applied to the scores awarded.

⁸² <https://www.ofgem.gov.uk/publications/energy-company-obligation-2022-26-eco4-guidance-new-measures-and-products>

Example score calculations with uplifts

6.78 Example 1: A property is located in a rural area in Scotland and is an off-gas property. This property is treated through the low-income route. It has a starting intermediate SAP band of low E and floor area of 150m². A cavity wall insulation measure is installed, which is an approved standard innovation measure. 100% of the measure is installed.

- The insulation measure has a base score of 198.8.
- The off-gas-rural uplift applies to this measure, with a value of $(198.8 \times 0.2) = 39.76$
- The 25% innovation uplift applies to this measure, with a value of $(198.8 \times 0.25) = 49.7$
- Therefore, the total score for this measure is:

$$\text{Total score} = £198.8 + £39.76 + £49.70 = £288.26$$

7. Notifications

Notifications

- 7.1 This chapter contains simplified guidance around the measure notification process and template. More details can be found in our supplier administration guidance⁸³.
- 7.2 Suppliers should notify measures to Ofgem using the measure notification template. The most recent version of the template must be used. Notifications should be made through the Great British Insulation Scheme register, to which obligated suppliers have access. Every measure must be identified through a unique supplier-generated 'Measure Reference Number'.
- 7.3 We are working on creating a process to allow manual notification to take place before 31 January 2024 should the register not be available to accept notifications. We will provide information and guidance with explanation on how the manual notification process will work in the future.
- 7.4 All retrofits under the Great British Insulation Scheme must begin with a whole house assessment performed by a retrofit assessor at the property in accordance with PAS2035. This includes an RdSAP assessment, which is a requirement for every Great British Insulation Scheme retrofit. Details about this RdSAP assessment and the information within it are required as part of the notification process, as they inform the eligibility of the measures and the scores they may receive eg the starting SAP rating of the property.

Timing of measure notifications

- 7.5 Great British Insulation Scheme measures completed after 30 March 2023 and on or before 31 December 2023 must be notified to Ofgem on or before 31 January 2024.
- 7.6 All measures that are completed after 31 December 2023 must be notified to Ofgem by the end of the month after the measure was completed. For example, if a measure is completed in March 2024, its notification deadline is 30 April 2024.
- 7.7 Measures notified beyond these deadlines will be treated as late notifications and will not be eligible unless the measure is awarded an extension (either automatic or manually awarded). Measures will undergo verification checks upon notification and may require re-notification if the information provided does not meet the

⁸³ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

requirements. Note the initial notification date of a measure determines whether it is within deadline, re-notification of a measure does not update the notification date.

When is installation of a measure complete?

- 7.8 The installation of a measure is complete at handover, at which point it must be able to deliver savings at a level expected for that measure. For measures installed in accordance with PAS 2030:2019 and 2035:2019, the meaning of handover is defined within these documents.
- 7.9 Suppliers must be able to evidence the date when a measure was completed. The documentation a supplier is required to hold is listed in our Great British Insulation Scheme Supplier Administration Guidance along with further guidance on defining when a measure is complete.⁸⁴

Notifications of late measures

- 7.10 Where a supplier is unable to notify measures before the notification deadline, the measures can still be successfully notified to Ofgem via one of the following two scenarios:
- a) Up to 5% of measures installed within the same period and notified on time may be granted an automatic extension of up to three months. For measures completed in 2023, this period is from 1 April 2023 to 31 December 2023. For measures completed from 2024 onwards, this period is on a monthly basis. Measures composing a maximum of 5% of the number of measures installed in each month and notified within their notification period, the notification deadline can be automatically extended for up to three months, or
 - b) A supplier can apply for an extension to the notification deadline.
- 7.11 For example, say a supplier has promoted several measures that were installed in March 2024. The notification deadline for these is 30 April 2024. If 100 of these measures were notified within the period, then up to 5 other measures installed in the same month can be notified as late as 31 July 2024 and be awarded an automatic late extension.
- 7.12 Where a supplier is unable to notify a measure within the notification deadline, they will have the option to apply to Ofgem for an extension to the notification deadline for

⁸⁴ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

a completed measure. The application must be in writing and must explain why the extension is being requested. The reason should be supported by evidence. A supplier should make an extension request promptly when it first becomes aware that it has failed, or will fail, to notify a measure by the notification deadline. Extensions can be requested at any time on or before 31 May 2026.

- 7.13 In general, extensions may be granted due to unexpected or unusual events that are unforeseeable or beyond the supplier's control and prevent the supplier from notifying a measure by the notification deadline. As this is judged on a case-by-case basis, we do not intend to provide an exhaustive list of eligible reasons for extension.
- 7.14 Please see our Great British Insulation Scheme Supplier Administration Guidance⁸⁵ document for more detail on late measures and extension requests.

Fair and transparent processing

- 7.15 In this section is covered guidance around GDPR and data processing for information which suppliers obtain about occupants or landlords of premises.
- 7.16 When fulfilling its Great British Insulation Scheme obligations, a supplier may obtain information about the occupant or landlord of the premises. Some of this information will need to be provided to us either as part of the monthly notification or in the course of our audits. In addition, in the course of the transfer of a qualifying action, one supplier will disclose this information to another supplier.
- 7.17 Suppliers may also obtain information about the occupant via Local Authorities which will also need to be provided to us as part of the notification process. This information will include but is not limited to, proof of eligibility and SAP band data.
- 7.18 A supplier should ensure that its processing of this information complies with all applicable data protection laws. A supplier should also ensure that any member of the supply chain acting on its behalf complies with the data protection laws.
- 7.19 In particular, it is the responsibility of a supplier to ensure the person who lives at the premises where the Great British Insulation Scheme measure is delivered knows how and why their information will be processed, including who the information will be disclosed to and for what purpose. This includes telling them that their data will be shared with us.

⁸⁵ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

- 7.20 The General Data Protection Regulation (UK GDPR) requires anyone collecting personal data to give the data subject (ie in the case of Great British Insulation Scheme the occupant or the landlord) a Privacy Notice.
- 7.21 So that we can process the data that suppliers provide, we require suppliers to provide the occupant under the Scheme with the Great British Insulation Scheme Working Group Privacy Notice Document, available on our website⁸⁶. This is a Great British Insulation Scheme Reporting Working Group document and not an Ofgem document. Full details of Ofgem’s ECO Privacy Policy (which includes Great British Insulation Scheme) can be found on our website.
- 7.22 Parties must have consent from households to use and access their personal data when using the DWP data matching service to confirm eligibility for either ECO4 or GB Insulation Scheme. Where consent was sought for purposes relating to only ECO4, further consent must be sought from the household where they are to instead receive support under the GB Insulation Scheme.
- 7.23 The wording in the Privacy Notice is intended to discharge some of our obligations under the UK GDPR. It is not intended, and should not be relied on, to discharge suppliers’ obligations for that legislation or other data protection laws. Further guidance on what information Privacy Notices should contain can be found on the Information Commissioner’s Office website.

⁸⁶ <https://www.ofgem.gov.uk/environmental-and-social-schemes/energy-company-obligation-eco/contacts-guidance-and-resources/eco-guidance-and-associated-documents>

8. Monitoring, audit and fraud prevention

Technical Monitoring

- 8.1 Under the Great British Insulation Scheme, measures installed and lodged on the TrustMark data warehouse will be subject to TrustMark's Quality Assurance framework⁸⁷.
- 8.2 TrustMark Quality Assurance verifies whether a measure has been installed to the relevant installation standards by a person of appropriate qualification and expertise. Failure to remediate measures that do not meet relevant standards may lead to measure rejection.

Audit

- 8.3 Ofgem also conducts audits of the measures notified to us by suppliers. Auditing verifies whether the processes and requirements we outline in our guidance documents have been followed. For example, this includes documentation to prove that a person is a member of the low-income group or a beneficiary of Great British Insulation Scheme Flex.
- 8.4 We may audit measures promoted by a supplier, and that audit may relate to any of the requirements in the ECO4A Order or our guidance documents. The documents and data that a supplier must make available to us are detailed in the Great British Insulation Scheme Supplier Administration Guidance.⁸⁸ In certain circumstances, for example where there is suspected scheme abuse, fraud, or misreporting, we may require a supplier to provide further information not listed in the Great British Insulation Scheme Supplier Administration Guidance.⁸⁹
- 8.5 We do not require suppliers to hold or retain these documents and data. A supplier may choose to enter an arrangement with a third party, such as an installer, under which the third party agrees to hold these documents and data and make them available to the supplier on request. Suppliers should decide how they will ensure they are in a position to make the documents and data available to an auditor within the required timeframes.

Fraud prevention

⁸⁷ For more information, please see <https://www.trustmark.org.uk/tradespeople/eco-technical-monitoring>

⁸⁸ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

⁸⁹ See article 83 of the ECO4 Order

- 8.6 Ofgem takes a zero-tolerance approach to fraud and scheme abuse. A dedicated Counter-Fraud team undertakes activities to detect, prevent and deter fraudulent activity across ECO including the Great British Insulation Scheme⁹⁰.
- 8.7 This guidance should be read and understood by all members of the supply chain, and suppliers should continue to make all reasonable endeavours to ensure members of the supply chain have read and understood the guidance and have sufficient evidence checking processes in place to ensure the supply chain comply. Not having read the guidance will not be taken as an acceptable excuse for not following the guidance.
- 8.8 All suppliers are expected to work closely with the Counter-Fraud team to ensure a collaborative and targeted approach. In the context of the Great British Insulation Scheme, fraudulent activity is any dishonesty or misrepresentation in relation to the ECO4A Order or our guidance that undermines the Government's policy intent or Ofgem's administration.
- 8.9 It is the responsibility of the supplier to ensure they are satisfied with the level of evidence received from installers.
- 8.10 A supplier is expected to mitigate the risk of fraud within its scheme activity. This should include, but is not exclusive to:
- a) Identifying and mitigating fraud risks
 - b) Controls to ensure savings determined using deemed scores, SAP assessments, EPCs, or alternative methodologies are correct. This list is not exhaustive.
 - c) Sufficient requirements within third party contracts to ensure that work is completed in accordance with the ECO4A Order and Ofgem guidance. This must include the activity of the whole supply chain, including all sub-contractors
 - d) Robust processes for getting regular, reflective activity reports from in-house installers and third parties
 - e) Continued scrutiny of in-house and third-party activity to ensure compliance with the ECO4A Order and Ofgem guidance

⁹⁰ Further information on the work of the counter fraud team, a contact number, e-mail address and a whistleblowing line are available on the following link <https://www.ofgem.gov.uk/environmental-and-social-schemes/counter-fraud-environmental-and-social-programmes>

- f) Suitable, senior manager oversight of activity and reporting
 - g) Processes to ensure accurate and reflective reporting to us, and
 - h) Processes for handling, investigating and reporting suspected fraud cases. This includes having processes in place for receiving allegations of fraud and whistleblowing from the public or supply chain.
- 8.11 A supplier is required to submit its fraud prevention strategy upon request. These strategies should be continually reviewed by suppliers to ensure they are sufficiently robust.
- 8.12 We will work closely with each supplier to ensure that their fraud prevention strategy is appropriate, effective, and robust. A supplier should be able to demonstrate the steps they have taken, and are taking, to eliminate fraud and should provide sufficient evidence to us to demonstrate those steps.
- 8.13 All suppliers are invited to attend the ECO and Great British Insulation Scheme Industry Fraud Prevention and Compliance Committee,⁹¹ a forum for discussing common fraud risks and issues across the industry and to drive best practice.
- 8.14 Suppliers should, in all instances, promptly report any instances of suspected fraud to the Ofgem Counter-Fraud team (counterfraud@ofgem.gov.uk)
- 8.15 A supplier must ensure their own investigations into suspected fraud cases are thorough and completed in a timely manner. A supplier should contact us if they have any questions regarding their investigation plan, approach, or results.
- 8.16 During the investigation of suspected fraud cases, we may suspend approval of the subset of measures to which the fraud relates, while we establish if it is an isolated incident or if further scheme measures are involved. Depending on the nature of the investigation, we may also suspend similar measures installed by that installer or third party. Where evidence of fraud is found, we may refuse or revoke approval of the Great British Insulation Scheme measures at risk.

⁹¹ The ECO Industry Fraud Prevention and Compliance Committee (EIFPCC) provides a forum for ECO-obligated suppliers, together with Ofgem and other representatives agreed by the group, to discuss fraud and compliance risks relating to instances of fraud within the ECO scheme and to agree mitigating actions encompassing prevention, detection, and response.

- 8.17 In addition, where evidence of fraud is found this should be reported by the obligated supplier to Action Fraud⁹², the Police⁹³, or any relevant accreditation bodies.

⁹² Action Fraud provide a central point of contact for reporting fraud in the UK. See <https://www.actionfraud.police.uk/> for more information.

⁹³ If the fraud is ongoing, it should be reported directly to the Police.

9. Appendices

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10. Appendix 1 – Associated scheme documents

10.1 Table 19 outlines our Great British Insulation Scheme templates along with a brief description of each document.

Table 19: Templates for The Great British Insulation Scheme

Great British Insulation Scheme template	Purpose of Great British Insulation Scheme template	Mandatory Signatories
GBIS Pre-Retrofit Eligibility and Premises Declaration	Collects confirmation of the eligibility of properties receiving measures under the Great British Insulation Scheme and collects premises level information before the installation of measure/s takes place. The form may be completed onsite or offsite before the start of the project.	<ul style="list-style-type: none"> • Customer • Retrofit Assessor / Retrofit Coordinator • Owner • Landlord • Social Landlord
GBIS Post-Retrofit Customer and Installer Declaration	Captures the details of the completed measure/s including POPT calculation.	<ul style="list-style-type: none"> • Customer • Retrofit Coordinator • Operative/s
Pre-existing Loft Insulation Declaration	To confirm that extraction has not taken place on pre-existing loft insulation outside of the relevant ECO project. It can be used either for ECO4 or Great British Insulation Scheme.	<ul style="list-style-type: none"> • Operative • Occupier

11. Appendix 2 – Premises and occupant requirements

11.1 This appendix supports [Chapter 3](#), outlining the documents and data that a supplier can use to demonstrate that the occupant requirements have been met for all projects.

Private domestic premises

The private requirement

11.2 You should note the following when collecting evidence to prove the private requirement of private domestic premises:

- a) Documents should be from official organisations (eg bank or mortgage society) or government departments, with the exception of Ofgem templates and tenancy agreements.
- b) The necessary information on the documents should be clearly visible.
- c) The dates on the documents should fit within the given timeframe as indicated throughout this guidance note.
- d) Letters or other documents that include other pieces of personal information not relevant to the Great British Insulation Scheme should be redacted. We do not need to see the cost of the premises, the amount of mortgage outstanding, bank details or anything else that does not affect the eligibility of the premises requirement.
- e) Suppliers should ensure that the data they collect complies with all applicable data protection laws. A supplier should also ensure that any member of the supply chain acting on its behalf complies with the data protection laws.
- f) We may need to audit suppliers' compliance with their legislative requirements up to and after the end of the Scheme. Suppliers must ensure that they are able to make documents available for the purpose of an audit or other compliance check

at any time before 1 December 2026. See the upcoming ECO4 and Great British Insulation Scheme: Monitoring Guidance for further detail.

Registered relevant interest

- 11.3 A supplier must provide evidence that the relevant interest does not belong to a social landlord by providing the full title register extract from one of the following:
- a) The Land Register maintained by Her Majesty's Land Registry for England and Wales, or
 - b) The Land Register of Scotland or the Register of Sasines for Scotland.
- 11.4 Where it is not possible to download a copy of the full title register on the Land Register of Scotland, the supplier must provide a screenshot of the search results.
- 11.5 Where the registry states that the premises have been leased or sub-leased, further evidence will be required to demonstrate that the premises are not let by a social landlord.
- 11.6 The extract must be dated no more than 12 months prior to the date of completion of the Great British Insulation Scheme measure.
- 11.7 The extract may be dated after the measure was completed where it shows that the date on which the relevant interest was acquired was prior to the completion of the measure. We will assume that the person to whom the relevant interest belongs had not changed in the period in between.
- 11.8 Documents that show who owns or rents the premises must relate to the person who has the current right to occupy these premises. In England and Wales an owner may be a freeholder, a leaseholder, or a sub-leaseholder.⁹⁴ A tenant may be a leaseholder or a sub-leaseholder. In Scotland premises are generally owned in arrangement which is similar to an English freehold while long leases are less common.
- 11.9 Where the premises are subject to a shared ownership arrangement between a private individual and a social landlord, we consider this arrangement to be a private

⁹⁴ Or in Scotland, the owner's interest or right, tenant's or sub-tenant's interest.

domestic premises as the private individual is a 'freeholder' or 'owner' of the premises. The full title register extract would need to show this.

11.10 Where a customer has entered into an agreement with a bank where the bank buys the property and sells it back to the customer over a period of time (for example, due to the customer's religious beliefs) the following documentation should be obtained by the supplier:

a) If it is the bank alone that has a registered interest in the property:

- a letter from the bank confirming the terms of their arrangement with the occupier, or
- a completed Ofgem template within The Great British Insulation Scheme: Templates to evidence private domestic premises and social housing (Template 2: Landlord and occupier statement where no written tenancy agreement exists).⁹⁵

b) If the occupier shows on the title extract as the 'registered owner' and the bank has a charge registered against the property, then this should be treated as a standard mortgage and the supplier should follow the guidance in paragraph 11.3

11.11 Where a customer has a Lifetime Mortgage Equity Release Scheme, the property is treated as owner-occupied, and the premises requirement can be evidenced through the same documents. For Home Revision Plan Equity Release Scheme, properties are considered on a case-by-case basis if they are owner-occupied or private rented sector. The evidence required will be dependent on the circumstances of each case.

11.12 Generally, where the relevant interest is registered as belonging to an individual person, we will be satisfied the premises are private domestic premises. If the search results prove inconclusive, ie the registered relevant interest belongs to a corporation and not an individual, the supplier must use other means to ensure that that entity is not a social landlord.

⁹⁵ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

- 11.13 Towards the end of the land registry extract there may be a 'schedule of notices of leases'. If the dates show that the premises are currently being leased, it will need to be identified whether the leaseholder is a 'social landlord'.
- 11.14 Where the registered relevant interest belongs to a social landlord, the premises may still be eligible as private domestic premises if they are rented at market rate or above.
- 11.15 If only the plot of land is registered, rather than the premises, it must be confirmed that the address where the measure will be installed matches the general address (eg street name/area) of the plot on the land registry. To do this, the full title register extract needs to be accompanied by a proof of residence. The address on the proof of residence must match the address on the land registry, with the addition of the building name or number and postcode. If the person living at the premises is an owner-occupier, you will need to ensure the name on the land registry matches the name of the proof of residence.

Unregistered relevant interest

- 11.16 Land registry evidence will need to be provided for each individual premises. Where a building has been converted into flats but is showing on the land registry as one property, we would not accept the land registry extract as sufficient evidence to demonstrate the registered relevant interest in each premises. In this scenario, the steps below would need to be followed.
- 11.17 Where the relevant interest is not registered, the supplier must prove this by providing a snapshot of the land registry search. The supplier must then prove that the relevant interest does not belong to a social landlord, or that the premises are leased under the 'Right to Buy', 'Right to Purchase' or 'Right to Acquire' schemes.⁹⁶
- 11.18 Where the relevant interest is not registered, the supplier must provide different evidence depending on whether:
- 11.19 The person who owns the relevant interest occupies the premises ('the owner occupier'), or

⁹⁶ The leases for these premises, which show they are under either 'Right to Buy', 'Right to Purchase' or 'Right to Acquire' schemes, can be used as evidence that the premises are private domestic premises.

11.20 the person who owns the relevant interest lets the premises to a tenant ('the owner landlord').

Owner occupiers

11.21 For owner-occupiers, the supplier must provide evidence of the relevant interest in the premises and, where applicable, proof of residence⁹⁷ to demonstrate that the owner-occupier has the current right to occupy the premises (ie the premises have not been leased to another person). The supplier will need to provide a copy of one of the following:

- 1) Title deeds (we will accept other deeds and legal declarations that explicitly state that the person owns the premises)⁹⁸, OR
- 2) A mortgage statement for the premises which is addressed to the owner occupier (the mortgage statement must be dated within 12 months from the start of a measure). Where the mortgage statement is older or is not addressed to the owner occupier, it must be accompanied by proof of residence dated within 12 months from the start of a measure), OR
- 3) A completed Ofgem template⁹⁹ and evidence proving that the owner occupier resides at the premises which:
 - Provides a declaration from a professional third party confirming they hold the title deeds for the premises and those deeds name the occupier as the freeholder/the person holding the owner's interest or right, or
 - Provides a declaration from a professional third party confirming that, following an investigation, the title deeds have been lost or destroyed and

⁹⁷ Proof of residence can be in the form of a benefit letter, or the list of official documents referenced in Appendix 11

⁹⁸ Examples of documents that can prove ownership include title deeds, deeds of conveyance, deeds of gift, conveyance documents, or a grant of admission, where they explicitly state that the person owns the premises. Where suppliers are not certain whether a document is eligible, they should contact us before installing a measure

⁹⁹ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

he/she is satisfied that the occupier is the freeholder/the person holding the owner's interest or right.

Owner landlords

11.22 In the case of owner landlords, the supplier must provide information on the tenancy in order to demonstrate that the tenant has the current right to occupy the premises.

11.23 Evidence proving the tenant resides in that premises is required to show that the tenancy agreement is still valid. The supplier will need to provide a copy of one of the following:

11.24 A written tenancy agreement between the owner landlord and the tenant demonstrating that the named tenant resides there. Where an extract from a written tenancy agreement is provided, the extract must show the:

- address of the premises
- term of the tenancy, and
- names and signatures of the tenant and landlord, OR

11.25 A completed Ofgem template¹⁰⁰ and evidence proving that the named tenant resides there. These templates are:

- in the case where the written tenancy agreement has expired, signed by both landlord and tenant confirming the occupancy agreement, OR
- in the case where no written tenancy agreement exists, signed by both landlord and tenant confirming the occupancy agreement,
- in the case where there is no tenancy agreement, an occupancy agreement signed by the executor/administrator of the estate and the occupier.

¹⁰⁰ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

Supporting information for demonstrating the relevant interest

- 11.26 If the documentation listed proves inconclusive, ie the relevant interest belongs to a corporation, the supplier must ensure the entity is not a social landlord (see paragraph 11.29).
- 11.27 If the owner-occupier or the tenant is the low-income group member, benefit letters addressed to the premises will be sufficient to demonstrate that the low-income group member resides at the premises. If the owner occupier or the tenant is not the low-income group member, a supplier will need to produce evidence to demonstrate that the low-income group member resides at the relevant domestic premise.

Social Housing

- 11.28 This section provides details on how to identify social landlords and determining the market rate.

Identifying social landlords

- 11.29 A social landlord means, in respect of premises in England and Wales:
- a) A local housing authority, within the meaning of section 1 of the Housing Act 1985¹⁰¹
 - b) A housing association, within the meaning of section 5 of the Housing Act 1985
 - c) A housing trust, within the meaning of section 6 of the Housing Act 1985
 - d) A charity, within the meaning of section 1 of the Charities Act 2011¹⁰²
 - e) A person listed in section 80(1) of the Housing Act 1985 (Wales only), or
 - f) A body registered as a social landlord under Chapter 1 of Part 1 of the Housing Act 1996 (Wales only).

¹⁰¹ <https://www.legislation.gov.uk/ukpga/1985/68/contents>

¹⁰² <https://www.legislation.gov.uk/ukpga/2011/25/contents>

11.30 A social landlord means, in respect of premises in Scotland, a person so described in section 165 of the Housing (Scotland) Act 2010.¹⁰³

11.31 A supplier may use one of the registers below to establish whether a corporate body falls under one of the above definitions of a social landlord. These registers do not contain an exhaustive list of social landlords and suppliers should be aware that these registers may not be completely up to date.

England

11.32 The Homes and Communities Agency provide a list of registered providers of social housing.¹⁰⁴

11.33 The Charity Commission holds a register of organisations that have been recognised as charitable in law.¹⁰⁵ Not all charities must register.

Wales

11.34 The Welsh Ministers maintain a public register of social landlords.¹⁰⁶

Scotland

11.35 The Scottish Housing Regulator maintains a register of social landlords.¹⁰⁷

Determining market rate

11.36 Where it is established that the relevant interest belongs to a social landlord, but a supplier wishes to establish HHCRO eligibility, the supplier must demonstrate that the premises were let at or above market rate, or where the premises are currently void, has not and will not be let at below market rate. In order to do this, it must produce:

- a) A tenancy agreement, and

¹⁰³ <https://www.legislation.gov.uk/asp/2010/17#:~:text=2010%20asp%2017&text=An%20Act%20of%20the%20Scottish,housing%3B%20and%20for%20connected%20purposes.>

¹⁰⁴ <https://www.gov.uk/government/publications/current-registered-providers-of-social-housing>

¹⁰⁵ <http://www.charitycommission.gov.uk/showcharity/registerofcharities/registerhomepage.aspx?&=&>

¹⁰⁶ <http://wales.gov.uk/topics/housing-and-regeneration/publications/registered-social-landlords-in-wales/?lang=en>

¹⁰⁷ <https://www.housingregulator.gov.scot/landlord-performance/landlords>

- b) Statistics showing the premises were rented at or above market rate. See below for more information on demonstrating rent above market rate.

11.37 When determining whether the property is let at below market rate the rent figure should not include the additional cost of service charge.

England

11.38 We consider market rate to be any monthly rent that is equal to or greater than the 'lower quartile value' for premises with the same number of bedrooms for the administrative area that the premises are located in. These statistics should be taken from the most recent table of VOA Private Rental Market Statistics at the time of completion of the measure.¹⁰⁸

Scotland and Wales

11.39 We consider market rate to be any monthly rent that is equal to or greater than the 30th percentile market rent for premises with the same number of bedrooms in the Broad Rental Market area the premises are located in. The supplier must use the most recent statistics at the completion of the measure. The 30th percentile for an area can be found on the following pages:¹⁰⁹

- **Scotland:** the 30th percentile of market rents can be found in column 3 of the Local Housing Allowance (LHA) methodology table.¹¹⁰
- **Wales:** The 30th percentile of market rents can be found in column 2 of the LHA table.¹¹¹

11.40 In instances where the rent paid is below these figures and a supplier believes that this rent is market rate, a supplier may provide us with alternative statistics in

¹⁰⁸ <https://www.gov.uk/government/collections/private-rental-market-statistics#history>

¹⁰⁹ The 30th percentile is a mathematical value which represents the level of rent where around 3 in 10 properties are let at or below LHA. The list of rents is a representative sample of private sector rents paid across the BRMA, including those from the lower end through to the upper ends of each rental market

¹¹⁰ <http://www.gov.scot/Topics/Built-Environment/Housing/privaterent/tenants/Local-Housing-Allowance/figures>

¹¹¹ <http://gov.wales/topics/housing-and-regeneration/welfare-reform/rentofficers/publications/?lang=en>

writing for consideration. Suppliers should get alternative statistics approved by us before delivering a measure to that tenant.

Determining Council Tax Band

11.41 Where households receive Great British Insulation Scheme measures through the general eligibility group, suppliers must provide evidence that the home falls within Council Tax bands A-D in England, and A-E in Scotland or Wales.

11.42 To evidence council tax band, suppliers must provide us with

- (a) screenshots from the VOA and SAA website to evidence the council tax band appropriate to a property at the time of the installation, or
- (b) council tax bill, addressed to the customer at the address which is receiving the measures.

11.43 The information to verify council tax band screen shot data is available online, and we expect suppliers to take the necessary steps to ensure that the information that they retain as evidence for all measures notified is correct.

Evidence for mobile homes

11.44 It is our understanding that mobile homes are not provided by social landlords as social housing. As a result, we do not require proof of ownership to determine whether the premises are private domestic premises. Therefore, for mobile homes, only evidence demonstrating that an eligible person resides at the premises is required (ie a low-income group member or a household identified as eligible by a local authority). See below for more information on how to evidence this.

11.45 Where supplier is seeking to install a measure into a park home, which is provided as social housing, they must contact us prior to installation.

11.46 Occupant requirements Premises are considered occupied, where any of the following documentation is dated after the building completion and prior to the installation of the measure:

- a) Utility bill, landline phone bill or TV licence,
- b) Council tax letter or letter from the council,

- c) Mortgage statement or bank statement,
- d) Tenancy agreement, or
- e) Extract from the electoral register.

11.47 Where these documents are not available, suppliers should contact us to discuss alternative documentation. Evidence of date of completion and occupancy must be made available on request. Where there is insufficient support evidence, the measure may be ineligible.

Evidence to demonstrate each of the eligible low-income group benefit types

11.48 Documents must establish that an occupant of the premises was a low-income group member at some point during the promotion of the measure.

11.49 Suppliers must be able to provide evidence that the low-income group member lives at the premises where the measure is being installed. In most cases, this will be the benefit letter.

11.50 There are several ways to show the customer is a low-income group member. The supplier can produce one of the following:

- a) a WHD Core Group notice dated 12 months from the start of the measure
- b) a matched DWP reference number
- c) a low-income group benefit letter
- d) supporting evidence such as bank statements and payslips to prove that the household is eligible for Child Benefit and within the income caps, as illustrated in Table 3.

11.51 Further information on the WHD Core Group notice and the DWP match eligibility route can be found in chapter 33.135.

11.52 If using benefit letters to prove low-income group eligibility, with the exception of a WHD core group notice and Child Benefit award notices, the letters must show that

the person received the benefit (and any qualifying components) within 12 months of the first measure completed. If the documents are older, suppliers must be able to provide updated evidence. Suppliers can use either the date the letter was sent or the start or end date of the benefit, if stated on the letter. Sometimes this may not correspond with the date the benefits started, in which case:

- a) If the benefit letter is sent before the benefit starts, we will accept the letter from that date if the person receives the benefit at some point within 12 months before the completion of the first measure, or
- b) If the benefit letter confirms the end of entitlement, it can only evidence low-income group eligibility when the end date of the award falls within 12 months before the completion of the first measure.

11.53 Online services are available for UC recipients which provide customers' up-to-date benefit entitlement information.

11.54 Where DWP data-matching verification is not used, only official HMRC, DWP/Jobcentre Plus, Pensions Service, and HM Government documents are deemed acceptable. This includes online confirmations from government departments, such as the HMRC online service and the Universal Credit full service. Use of any other documents must be agreed in writing with us before installing a measure.

11.55 We do not require full 'proof of benefit' letters or award notices. To evidence low-income group eligibility, we only need the page(s) that show:

- a) official letter headed paper from HMRC, DWP/Jobcentre Plus, HM Government or the Pension Service
- b) name and address matching where the measure was installed. Where the address is different, official documents proving they resided at the premises where the measure was installed
- c) relevant date (either of the letter, start or end of the benefit), and
- d) confirmation that a customer receives a qualifying benefit.

11.56 The low-income group benefit types for the purposes of the Scheme are:

- a) Income based Jobseekers Allowance (JSA),
- b) Income related Employment and Support Allowance (ESA),
- c) Income Support (IS),
- d) Pension Credit Guarantee Credit (PCGC),
- e) Working Tax Credit (WTC),
- f) Child Tax Credit (CTC),
- g) Universal Credit (UC),
- h) Housing Benefit,
- i) Pension Credit Savings Credit (PCSC),
- j) Child Benefit.

Other official documents which can evidence occupancy

11.57 Where the above benefit documentation is not addressed to the private domestic premises, further evidence showing that the low-income group member resides there will be required.

11.58 Any official documents addressed to that person at the address where the measure is to be installed, such as:

- a) an extract from the electoral or open register

- b) a utility bill,¹¹² a landline phone bill, or a tv license
- c) a mortgage statement, a bank statement, or
- d) any other official documentation as agreed with Ofgem.

11.59 Where the recipient of benefits is a child and a parent or guardian is claiming the benefit on behalf of the child, a Child Tax Credit award notice can be used to evidence that the child lives at the premises where the measure is being installed. The evidence needs to state both the child's name and parent who is claiming the benefit on behalf of the child.

11.60 The documents must be dated on the date of completion of the measure or no earlier than 12 months prior to the date of completion of the measure.

Documents relating to a change of name

11.61 There are cases where a person changes their name, with the result that:

- a) the person's old name appears on the title deeds or the mortgage statement if the person is a freeholder/leaseholder/owner or the tenancy agreement if the person is a tenant, AND
- b) the person's new name appears on low-income group benefit documents or other official correspondence (described above).

11.62 In such cases, a supplier will need to produce a signed declaration from the person that their name has changed. The declaration should be prepared using the Great British Insulation Scheme: Templates to evidence private domestic premises and social housing (Template 6: Declaration of change of name).¹¹³

Children and qualifying young persons: How to confirm responsibility for children and qualifying young persons

¹¹² We are aware that utility bills for park home residents are often developed and provided by the park home site owner. We would not consider these types of utility bill as being appropriate to evidence occupancy.

¹¹³ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

11.63 Responsibility for a child or qualifying young person is defined in regulation 3 of the Child Tax Regulations 2002. Generally, a person shall be treated as responsible for a child or qualifying young person who is normally living with them. If fostering a child through a council and the child's accommodation or maintenance is borne by local authority funds, the foster parents are also not responsible for a child for the purposes of the Scheme if they are being looked after by a local authority,¹¹⁴ and that authority has placed them in the home of someone proposing to adopt them.

Guidance on redacting information

11.64 The document(s) that should be made available to us on request should contain a minimum amount of information to prove eligibility under the low-income group. This would be a letter-headed document that states the customer's name and address and shows receipt of the qualifying benefit(s). It is not necessary to provide the entire document, only the relevant pages.

11.65 Letters that include other pieces of personal information not relevant to the Scheme should be redacted. What can be redacted depends on the customer's low-income group qualification route. Consider the following when submitting documents to us:

- a) The amount the customer receives from their benefit. You only need to show that they receive that benefit.
- b) For low-income group routes which are not means tested (eg Income Support or State Pension Credit), you do not need to show the customer's income or savings.
- c) National Insurance numbers should not be visible. These are often shown on the front page and should not be used as a unique identifier.

11.66 When processing any personal data or sensitive personal data, suppliers are reminded of their duties to comply with the requirements of data protection law.

11.67 We may need to audit suppliers' compliance with their legislative requirements up to and after the end of the Scheme. Suppliers must ensure that they retain information

¹¹⁴ For Tax Credit Recipients see, article 3, paragraph 2.2 (Rule 4) of the Child Tax Credit Regulations 2002. For Universal Credit Recipients see article 4(6) of the Universal Credit Regulations.

up to 31 March 2026. It is the suppliers' responsibility to keep up to date with any changes to requirements.

Example letters

11.68 These are some examples of different types of letters that you may encounter.


11.69 We indicate whether the documents are suitable to evidence low-income group eligibility. We have highlighted certain parts of these documents that need to be considered when determining eligibility.

11.70 This is non-exhaustive list of the eligible benefits or scenarios for low-income group eligibility. This is a sample to be used to demonstrate some of the letters that may be provided. For further clarification about whether a document is eligible, suppliers should contact the ECO team at Ofgem on eco@ofgem.gov.uk.

11.71 Please find example letters for following benefit letters in the following:

- a) Income-based Jobseeker's Allowance (JSA),
- b) Income-related Employment and Support Allowance (ESA),
- c) Income Support (IS),
- d) Pension Credit Guarantee Credit (PCGC) and Pension Credit Savings Credit, (PCSC),
- e) Working Tax Credit (WTC),
- f) Child Tax Credit (CTC),
- g) Universal Credit (UC), [not included in this guidance version],
- h) Housing Benefit,
- i) Child Benefit (subject to income caps and composition),

Example 1: Income Support, Income-related Employment and Support Allowance and Income-based Jobseeker's Allowance letter:



Department
for Work &
Pensions

Title, Initial, Surname
Address Line 1
Address line 2
Address line 3
Address line 4
Postcode

Building or Office location
Office type
Street
Town
Postcode

www.gov.uk

Telephone: 0000 000 0000
Textphone: 0000 000 0000

Your reference:

Information about your benefits payments

Please read this letter in full

Dear

Select Option

Select Option

Select Option

Your payment details

You were paid [Insert Benefit Name] between the following dates:

Start Date	End Date	Rate	Frequency

Select Option

You were also paid [Insert Benefit Name] between the following dates:

Start Date	End Date	Rate	Frequency

We have many different ways we can communicate with you.

If you would like braille, British Sign Language, a hearing loop, translations, large print, audio or something else please tell us using the phone number at the top of this letter.

Please turn over

Select Option ▼

Reporting changes

Confirm all dropdown options

You must tell us straightaway if there is a change in your circumstances. If you give wrong or incomplete information, or you do not report changes, you may be paid more or less money than you should. You will have to pay back overpaid money when told to do so. You could also be prosecuted or need to pay a financial penalty. If we pay you less money than we should we may pay you this money back.

More information

If you would like any further information, please contact us on the number at the top of this letter.

Yours sincerely,

Office manager

Treating people fairly

We are committed to the Equality Act 2010 and treating people fairly. To find out more about this law, search 'Equality' on www.gov.uk

Call charges

Calls to 0800 numbers are free from personal mobiles and landlines.

Why DWP needs personal information and how we treat it

We treat personal information carefully. We may use it for any of our purposes. To learn more about information rights and how we use information, please see our DWP Personal Information Charter at www.gov.uk/dwp/personal-information-charter

Example 2: Working Tax Credit (WTC)

PERSON A 421 HAPPY WAY HAPPY HA1 PP7	Textphone 0345 300 3905 For our opening hours go to www.gov.uk/contact-hmrc TCO PRESTON GREAT BRITAIN PR1 4AT Date: 13 May 2022
---	---

Amended tax credits award for 06/04/2021 to 05/04/2022

PERSON A	National Insurance Number	AB123456C
PERSON B	National Insurance Number	BA654321C

Summary

Tax credit for the period - see Part 2

Working Tax Credit	£1,500.00
Child Tax Credit	£1,000.00

Amounts still to be paid to you for the period shown above – see Part 3

Working Tax Credit to	PERSON A	£500.00
Child Tax Credit to	PERSON A	£1,000.00

Tax credits are based on your personal circumstances and income for the whole tax year. After the end of the tax year, when all the information is known, we make a final decision about how much you are entitled to receive.

Part 1 shows your circumstances, including your income. Please check this part and tell us immediately if anything is wrong, missing or has changed.

Part 2 is for information. It shows how we calculate your tax credits.

Part 3 gives details about any payments we will make for the period shown above.

Your rights and obligations

Your Charter explains what you can expect from us and what we expect from you. For more information go to www.gov.uk/hmrc/your-charter

Why we are writing to you

Thank you for telling us that your circumstances have changed.

Part 2 How we work out your tax credits

The amounts shown in this Part are provisional until your actual income and personal circumstances are known and we make a final decision after 5 April 2022.

Tax credits are made up of elements. The elements you receive and the periods you receive them for are shown below. Your income may reduce the amount of tax credits you receive. We show any reductions below.

Working Tax Credit elements

Basic	from	06/04/2021	to	05/04/2022 (365 days)	£1,000.00
30-hour element	from	06/04/2021	to	05/04/2022 (365 days)	£500.00
Lone Parent element	from	06/04/2021	to	05/04/2022 (365 days)	£500.00
Total					£2,000.00
Reduction due to your income					£500.00
Amount for the period					£1,500.00

Example 3: Child Tax Credits (CTC),

Child Tax Credit

A child element may be paid for a child from birth until the day before 1 September following their 16th birthday.

After that, a child element may be paid for a young person under 20 who is studying for a qualification up to and including A level, NVQ level 3 or Scottish national qualifications at higher or advanced level or equivalent, or who is on an approved training course. This does not include studying for a university degree or similar qualification. You must tell us straightaway if a child over 16 and under 20 enters or leaves full-time non-advanced education or approved training. A child element for a young person aged 16, 18 or 19 will automatically stop each year unless you tell us they are continuing in full-time non-advanced education or approved training. If you are receiving the child element for a young person aged 17 and they are continuing in full-time non-advanced education or approved training, you will automatically continue to receive the child element.

Child elements for children

Child A

1	child element	from	06/04/2021	to	05/04/2022 (365 days)	£1,500.00
---	---------------	------	------------	----	-----------------------	-----------

Family elements

Total Child Tax Credit elements	£1,500.00
Reduction due to your income	£500.00
Amount for the period	£1,000.00

Example 4: Pension Credit Guarantee Credit and Pension Credit Savings Credit benefit. (Note the page containing the beneficiary's details will follow separately from this page).



	Our phone number is
	Code Number
	If you have speech or hearing difficulties you can contact us using a textphone on the number at the bottom of this page.
	If you get in touch with us, tell us this reference number

Pension Credit

Date

About your application

Pension Credit Award Notice and Statement of Details

Dear Sir or Madam,

About your appointment to act

You have Power of Attorney or are acting for xxx and this means you are responsible for dealing with their benefit. The information in this letter is about them.

If your Power of Attorney or appointment to act ends for any reason please let us know immediately.

Thank you for contacting The Pension Service and making an application for Pension Credit.

We are pleased to tell you that **you are entitled to** Pension Credit of £ xxx a week from xxx.

Yours sincerely,

Pension Centre Manager

Example 5 (a): Housing Benefit exemplar letter for someone who is not working

* In this exemplar letter, 'we' refers to the District Council.

Example 1 – Award letter for someone not working.

0001860101000000

01480
388308

Huntingdonshire
DISTRICT COUNCIL

Benefits Section, Pathfinder House, St. Mary's Street,
Huntingdon, Cambs PE29 3TN
Email: benefit@huntingdon.gov.uk

Benefit Decision Notice

Please read the enclosed notes carefully. A more detailed explanation of this calculation can be provided on request.

Customer Name
Customer Address

Claim Ref: 2
Council Tax Ref:
Landlord Ref:
Rent Ref:
Date: 21 Apr 2015

Your reference number. Please quote your number when contacting us.

Date we made our decision.

This tells you the reason why you have been sent the award letter.

REASON FOR CALCULATION: anna has no income

Your total weekly benefit award.

HOUSING BENEFIT

The Weekly Benefit Award is: £129.61
Less Overpayment Recovery: £0.00
Benefit Awarded: £129.61
Weekly gross Rent/Council Tax is: £144.16
The Benefit Starts on: 27 Apr 2015
Weekly Eligible Rent/Council Tax: £144.16
Weekly Ineligible Service Charges: £0.00

Any weekly amount deducted to repay a Housing Benefit overpayment will be shown here.

The weekly amount due to be paid to you or your landlord.

The start date this award period relates to.

This is the amount of rent we use to work out your entitlement. This may not be the total rent you pay.

dependant deductions: £14.55

ROW-DEF NAME	GROSS INCOME (WK)	INCOME BAND	DEDUCT (HB)	DEDUCT (CTAX)
ANNA	£0.00	24-not work, 25+ IS	£14.55	

We have used the following information to work out your weekly benefit:
Claim based on income related ESA

This section shows the income we have used to work out your benefit.

This section will show the names of anyone aged over 18 who live with you (excluding your partner), their income and the amount of any weekly deduction(s) we have to make from your benefit because of this.

You must tell us straight away if your circumstances change

Claim: 2 CLM 305 Page 1 of 1

Example 2 – Award letter for someone in work

Huntingdonshire
DISTRICT COUNCIL

Benefits Section, Pathfinder House,
St Marys Street, Huntingdon, PE29 3TN
Email: benefits@huntingdonshire.gov.uk

Tel: 01480 388308

Benefit Decision Notice

Please read the enclosed notes carefully. A more detailed explanation of this calculation can be provided on request.

Customer Name
Customer Address

Claim Ref: 2
Council Tax Ref:
Landlord Ref:
Rent Ref:

Date: 17 Apr 2015

REASON FOR CALCULATION: Wage slips received

The Weekly Benefit Award is:
Less Overpayment Recovery:
Benefit Awarded:
Weekly gross Rent/Council Tax is:
The Benefit Starts on:
Weekly Eligible Rent/Council Tax:
Weekly Ineligible Service Charges:

HOUSING BENEFIT

£82.62
£0.00
£82.62
£150.00
13 Apr 2015
£150.00
£0.00

Non dependant deductions:

£0.00

NON-DEP NAME GROSS INCOME (WK) INCOME BAND DEDUCT (H) DEDUCT (CTAX)

We have used the following information to work out your weekly benefit:

FINANCIAL DETAILS:

Your weekly earnings £0.00
Your partner's weekly earnings £251.66
Any other income (converted to wkly) £179.60
Assured Income from £717 Capital £0.00
TOTAL WEEKLY INCOME £431.26
Disregarded income £61.60
Less Expenses £0.00
INCOME USED IN CALCULATION £369.76

APPLICABLE AMOUNT

Family premium £17.45
Young Person £66.90
Couple (one between 18 & pension age) £114.86
Young person £66.90
TOTAL APPLICABLE AMOUNT £266.10


You must tell us straight away if

Claims: 2

CLM 305

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Example 6: Child Benefit

 HM Revenue & Customs	Child Benefit
Donald Duck 1 The Pond POOLE SW1 1MS	Child Benefit Office HM Revenue and Customs BX9 1GT
	Phone 0300 322 9075 extension 02 8:30am to 5:00pm
	Web www.gov.uk
Date 18 May 2022 Our Ref CBO EC Changes NI number AA000000A	
About your Child Benefit	
You're entitled to Child Benefit at £21.80 a week from 11 April 2022.	
You can get Child Benefit at £21.80 a week from 11 April 2022.	
We usually pay Child Benefit at the beginning of every week or every 4 weeks. We'll pay your Child Benefit into your bank/building society account.	
If your child was born on a Monday, the earliest you can be entitled to Child Benefit is the Monday after their birth.	
The way your Child Benefit is made up is shown on page 2. It also tells you what to do if you disagree with our decision.	
For information on what changes you must tell us about, go to www.gov.uk/report-changes-child-benefit	
Tell us about changes online, go to www.gov.uk/personal-tax-account	
We no longer issue Child Benefit numbers to new customers so you will not need one when you contact us. Child Benefit accounts are all held under your National Insurance number.	

How your child benefit is worked out

Total weekly rates from 11 April 2022

Basic amounts:

Huwey: £21.80

Amount payable: £21.80]

Other important information

For more information about how we pay Child Benefit, go to www.gov.uk/how-to-have-your-benefit-paid

What to do if you want to know more about this decision or you think it is wrong

Phone us on the number on the first page of this letter and we'll explain our decision to you. You should contact us within one month of the date of this letter or we may not be able to consider a dispute of this decision.

What happens after the decision is looked at again

If the decision can be changed we'll send you a new decision. If we cannot change the decision we'll tell you why. You'll still have the right to request a reconsideration of the decision.

Asking for a reconsideration

Ask us for a copy of factsheet CH24A, 'What to do if you think your Child Benefit or Guardian's Allowance decision is wrong'. It explains the reconsideration process. You can request a reconsideration using one of the following methods, but you must do this within one month of the date of this letter:

- by going online – go to www.gov.uk and search for CH24A
- in writing – fill in the form in CH24A and send it to us at the address shown on this letter
- by phoning our helpline on 0300 200 3100

Childcare top-up for working parents

If you are considering childcare, you may be eligible for government top-up towards the costs through Tax-Free Childcare. Please see GOV.UK at www.gov.uk/tax-free-childcare

Example 7: Warm House Discount (WHD)

Your reference is: [REDACTED]



Warm Home Discount: £150 automatic help with your energy costs

You will receive this discount automatically - you don't need to contact us

Dear [REDACTED] [REDACTED]

We are pleased to tell you that you qualify for a discount of £150 to help you with the cost of your energy bill.

HM Government is working with energy suppliers to help people on lower incomes with their energy costs, through the Warm Home Discount Scheme.

You will get this discount automatically and don't need to do anything.

Why do I qualify?

You qualify for the discount because on XX/XX/2022 (the qualifying date) you (or your partner, if applicable) were:

- in receipt of Pension Credit Guarantee Credit; and
- a customer of an electricity supplier that is taking part in the scheme; and
- named on your electricity account

What happens next?

You don't need to do anything.

Your energy supplier will apply the discount to your electricity account by 31 March 2023 at the latest – in the majority of cases the discount will be applied between October 2022 and 31 January 2023. **For all payment queries, please contact your electricity supplier direct.**

If you pay your electricity costs by pre-payment meter, your energy supplier will contact you about how you will get your discount.

More information

There is more information on the back of this letter to answer any questions you may have.

Examples of suitable evidence for ECO4 Flex referral routes

Table 20: Examples of suitable evidence for each of the ECO4 Flex referral routes.

Referral Route	Evidence
Route 1: Low income	<ul style="list-style-type: none"> • 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 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 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.

<p>Route 2: Proxy targeting</p>	<ul style="list-style-type: none"> • Screenshot from the LA confirming the household is within a LSOA area, supported by Office for National Statistics (ONS) data: https://onsdigital.github.io/postcode-lookup/. • 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 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: NG6, excluding the low-income proxy (recommended). Or at least one of these non-exhaustive suggestions in written form, which may apply for other conditions/diseases etc in the NICE Guidelines (we recommend providing more for greater certainty): <ul style="list-style-type: none"> ○ 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. <p>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.</p> <ul style="list-style-type: none"> • Signed letter from local coordinator / local authority that proves the household was eligible for a LA-run scheme. • Eligibility Checking Service (ECS)¹¹⁵, documentation showing eligibility for free school meals due to low-income provided by the Department for Education or from the school¹¹⁶.
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	<ul style="list-style-type: none"> Signed letter accompanied by proof of gas and electricity debt from the energy supplier or Citizens Advice, showing that the household has been referred to the LA for support with their energy bills. PPM / non-PPM evidence (supplier provided data): Customer tariff data to indicate the customer's payment method.
Route 3: NHS referrals	<p>Official letter signed by either an NHS Trust, NHS Trust Board or a person registered in the General Practitioner Register. We would accept referrals from any health professional with a valid NHS email. This letter will need to state that the official signing the letter considers someone in the household to be suffering from one of the four health conditions listed in Table 4.</p> <p>In recognition of doctor's and GP's time and effort, and to reduce their administrative burden, we have published a standard referral letter on our website that can be used for Route 2, proxy 3, and must be used for Route 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 Advice. We have also published an installer verification letter so that surveyors can notify eligible households to the LA, and a household application form to allow eligible households to apply to their LA. These letter and form templates can be found on the Ofgem website¹¹⁷.</p>

¹¹⁵ fsm.education.gov.uk

¹¹⁶ <https://www.gov.uk/government/publications/free-school-meals-guidance-for-schools-and-local-authorities>

¹¹⁷ <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-la-and-supplier-flex-forms-and-subsidiary-documents>

12. Appendix 3 – Uplifts and caps

Introduction

12.1 This appendix contains tables listing all the various uplifts and caps in the Great British Insulation Scheme

Table 21: Uplifts and increases in the Great British Insulation Scheme

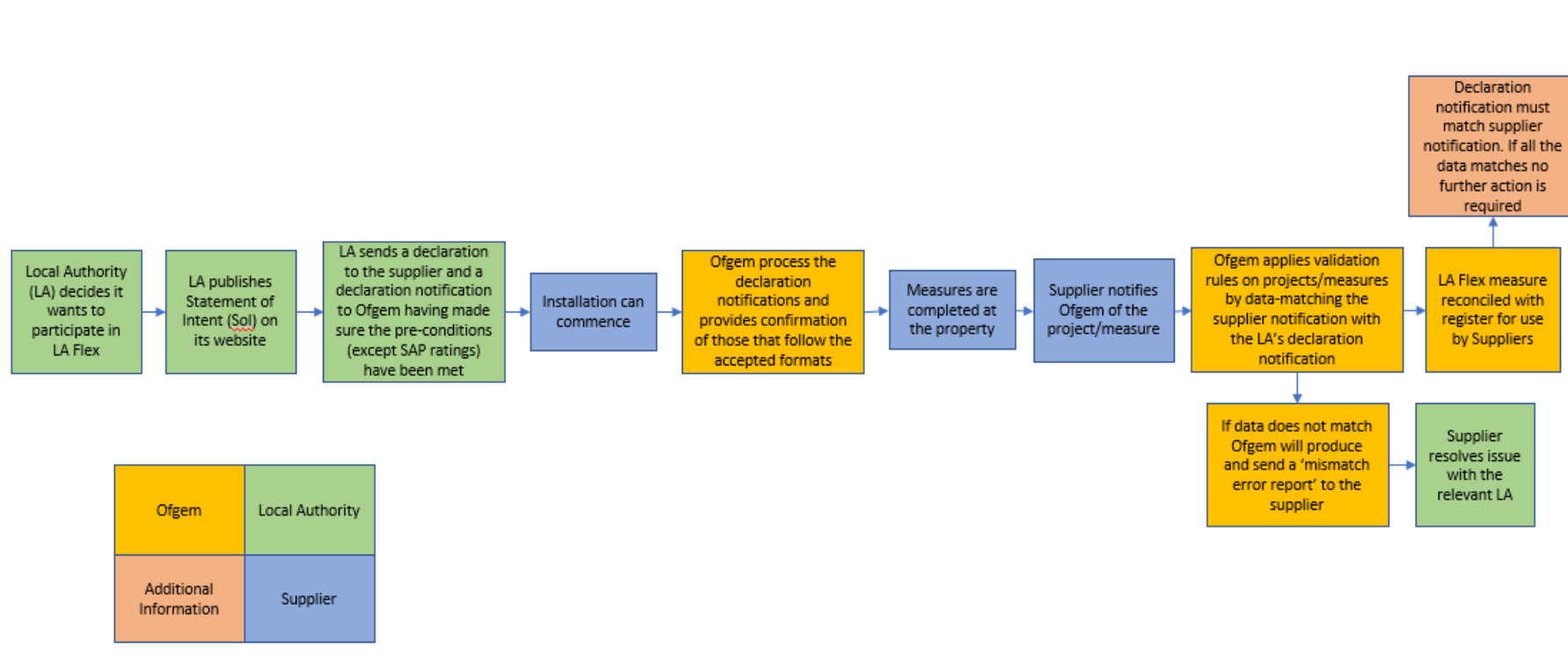
Uplift / Increase	Limit on uplifts in project	How uplift / increase is applied	Rate / value	How / when uplift / increase should be notified	Eligible properties
ECO4 innovation measure	10% of the low income low-income-minimum threshold of 20%	Multiplication factor uplift	25% or 45%,	Applicable measures	Low-income group only
Off-gas and rural	No limit	Multiplication factor uplift	20%	All measures	Low-income group, rural and off gas properties in Scotland and Wales only

Table 22: Caps in the Great British Insulation Scheme

Cap	What does the cap limit?	Value	Impact of project / measure breaching cap ¹¹⁸
Innovation Measure – general	% of obligation awarded to innovation measures (cost savings value + innovation uplift)	10% of each supplier's low-income obligation for the year	Score still awarded but with IM uplift(s) excluded
Great British Insulation Scheme Flex (Local Authority and supplier flex)	% of obligation awarded to projects with Great British Insulation Scheme flex ECO flex eligibility route	80% of each supplier's low-income obligation for the year	

¹¹⁸ Whether a cap has been breached and any subsequent scoring impacts will occur after final determination

13. Appendix 4: Great British Insulation Scheme Flex process for Local Authorities (LAs)



14. Appendix 5: Great British Insulation Scheme Abbreviations Table

Abbreviation	Explanation
BUS	Boiler Upgrade Scheme
CoL	Certificate of lodgement
CTC	Child Tax Credit
CWI	Cavity wall insulation
DA	Devolved authority
DOCI	Date of completed installation
DWP	Department for Work and Pensions
ECO	Energy Company Obligation
ECO4 Flex	Flexible eligibility in ECO4
ECS	Eligibility Checking Service
EER	ECO Eligible Referral
EPC	Energy Performance Certificate
ESA	Income related Employment and Support Allowance
EST	Energy saving trust
EWI	External wall insulation
GDPR	General Data Protection Regulation
GE	General eligibility group
HHCRO	Home Heating Cost Reduction Obligation
HMO	Houses in multiple occupation
HMRC	HM Revenue and Customs
HTHG	Help To Heat Group
HUG	Home Upgrade Grant
HWI	Hybrid wall insulation
IMs	Innovation measures
IS	Income Support
IWI	Internal wall insulation
JSA	Income based Jobseekers Allowance

Abbreviation	Explanation
LA	Local authority
LHA	Local Housing Allowance
LIG	Low-income group
LPG	Liquefied petroleum gas
LSOA	Lower Super Output Area
MCS	Microgeneration Certification Scheme
MEES	Minimum Level of Energy Efficiency Standard
MR	Minimum requirement
NICE	National Institute for Health and Care Excellence
NMAP	New Measures and Products
ONS	Office for National Statistics
OO	Owner occupied
PAS	Publicly Available Specification
PCGC	Pension Credit Guarantee Credit
PCSC	Pension Credit Savings Credit
PCWI	Party cavity wall insulation
PHI	Park home insulation
PIBI	Pre-installation building inspection
POPT	Percentage of property treated
PPM	Pre-payment meter
PPS	Partial Project Score
PRI	Pitched roof insulation
PRS	Private rented sector
RdSAP	Reduced Data Standard Assessment Procedure
RICS	Royal Institution of Chartered Surveyors
RIR	Room-in-roof
RIRI	Room-in-roof insulation
SAP	Standard Assessment Procedure
SAP rating	Numerical value normally between 1 and 100 based on calculated energy costs for the premises.

Abbreviation	Explanation
SFI	Solid floor insulation
SH	Social Housing
SoI	Statement of Intent
SWI	Solid wall insulation
TRVs	Thermostatic radiator valves
TTZC	Time and Temperature Zone Control
UC	Universal Credit
UFI	Underfloor insulation
UK	United Kingdom
URN	Unique reference number
WHD	Warm Home Discount
WTC	Working Tax Credit

15. Appendix 6: Documentation Guidelines

- 15.1 As the administrator of the Great British Insulation Scheme, Ofgem must ensure that energy suppliers comply with the legislation and meet the requirements regarding eligibility and installation set out in our guidance. A supplier is responsible for ensuring that they, and any member of the supply chain acting on their behalf, complies with the applicable requirements of the law and industry standards.
- 15.2 This section outlines the existing requirements and expectations when it comes to the completion of documentation and notification/lodgement of information in the Great British Insulation Scheme Registers or on the TrustMark database that is used to support the eligibility and compliance of a scheme measure.
- 15.3 The information in the below paragraphs outlines the minimum standards that Ofgem expects to be met when completing any Great British Insulation Scheme documentation or notifying/lodging any Great British Insulation Scheme information. Any measures installed during the Scheme where documentation or information does not meet these standards may be rejected.

Quality of documentation

- 15.4 We have worked with energy suppliers to develop the following standards, which must be followed as a minimum.

Evidence must be complete

- 15.5 Documentation must be completed fully. All pages of any documentation must be present.
- 15.6 All documentation must be legible, including where photographic evidence of documents (eg benefit letters) is taken. All forms must be clear and comprehensible and therefore where possible, abbreviations should be kept to a minimum and no 'text message' language should be used. Where conclusions or comments are required on documentation, these must be detailed and not one-word answers.
- 15.7 Information provided in documentation should be consistent across documents.

- 15.8 If there is any need to make changes or additions to any document, prior agreement must be given by the energy company or funding supplier. Forms may be branded, provided the agreed template wording stays the same as the forms published on the Ofgem website.
- 15.9 Mistakes should not be hidden. Any errors in documentation should be scored through with a single line and the correction written alongside, signed (by the original signatory) and dated. Correction fluid should not be used. Where we find evidence that documentation has been changed at any later point after the signature, this will result in the rejection of the measure. Where evidence needs to be amended, for example where work on a measure had not been finished, the installer needs to ensure all paperwork is resigned and the date re-notified. Where evidence is blurry, unclear or faded, this may not be accepted as evidence and measures may be at risk.
- 15.10 Evidence should be provided as standalone files, in '.pdf' format where possible, and not embedded within other documents or files.
- 15.11 All photos used to support the eligibility or compliance of a measure must be time, date and geo-stamped. Photos used as evidence should retain accurate information and not have their details tampered with.

Digital software use

- 15.12 Some obligated energy suppliers may request confirmation of which electronic application or software is being used in the delivery of the Scheme measures. A demonstration of the software may be required.
- 15.13 It must not be possible to auto-populate fields which require information specific to a premises or measure, such as dates or customer signatures. Fields which apply in all cases, such as the installer's PAS certification number and address and contact details of the consumer, can be auto populated.
- 15.14 The software used must ensure that any fields cannot be modified at a later date. Documents must be saved automatically once completed, and when there is a need for an update, documents should be version controlled and a record of any changes

stored. It must not be possible to change the date of documents that were completed electronically.

- 15.15 The format of any document must be compatible with standards software so that they can be opened and read by Ofgem and suppliers without the need to purchase new or additional software.
- 15.16 If it is not possible to use an electronic application to obtain particular documents and customer signatures, the branded electronic paperwork should not be used, ie the brand of the application should not show on paperwork which has been manually completed and signed.
- 15.17 Where customers have signed documents electronically, they must have access to documents after any works are completed. This can include paper versions of documents.
- 15.18 Where software requires logins by specific members of the supply chain, care should be taken to ensure that logins are not shared/used by other people, it is the responsibility of the person whose login it is to ensure their login is not being used by other people.

Signature application

- 15.19 Signatures and dates must only be used where they are embedded and consistent in the documentation. Wet signatures must be applied with a pen and electronic signatures preferably with a stylus, although use of a finger is also acceptable.
- 15.20 Signatures must not be copy and pasted. Where signatures are copied and pasted, for example to streamline administrative processes, the document will not be accepted. Any copying and pasting could result in the rejection of a measure.
- 15.21 All documentation must be completed, signed, and dated by the appropriate individual, such as the operative, landlord, customer, householder, or retrofit coordinator. Signatures should not be applied on behalf of someone else, eg by other operatives or by office staff, and there should be no amendments to signatures or dates.

- 15.22 Signatures and signature boxes within documents should be user-friendly and consumers should receive instructions on how to complete these correctly if required. The software used to produce electronic documents must not be capable of assigning a customer signature to a signature box which they have not signed. The signature must be independently embedded and not copied or replicated. Individual signatures must be obtained for each individual signature box. It is recommended that the operative is equipped with a stylus to ensure satisfactory signature is captured.
- 15.23 Should any instances of replicated or copied signatures occur when using electronic paperwork or a digital application, this should be investigated and rectified prior to sending to the obligated supplier.
- 15.24 Where Ofgem detects signatures have been assigned or auto populated by software, for example as the result of purpose-built software or 'software glitches', those forms will not be accepted and may result in the associated measures being rejected.

Data Protection considerations

- 15.25 It is essential that all personal data collected is processed in accordance with the retained EU law version of the General Data Protection Regulation 2016/679 (UK GDPR) and the Data Protection Act 2018. In particular, data must be accurate and processed lawfully, fairly, and in a transparent manner. This applies to both hard copies and electronic copies of any documentation. Where hard copies, photocopies, or photographs of customer documents, such as benefit letters, are provided, personal information not relevant to the Scheme should be redacted.

Notes on completion of specific documentation

- 15.26 The guidance in the previous paragraphs outline what is expected regarding the provision of signatures on scheme documents. It also notes practices that should not take place, such as the copying and pasting of signatures or software auto-populating documents with a signature from another document or part of the same document.
- 15.27 Many of the documents required with measure submission are declarations and in signing, the party is confirming the information recorded in the form is true and

accurate. **It is a criminal offence to knowingly make a false declaration¹¹⁹, and such an offence may be punishable by a fine, imprisonment or both.**

15.28 Users of the Scheme documents should therefore always read the wording on each document as they will find text outlining where signatures are required and from whom they are required. It is critical to ensure the correct person signs the appropriate sections of the various documents. Following paragraphs present some examples we want to draw particular attention to.

Signature practices that are not permitted

15.29 The following section outlines activity in relation to signature provision on the Scheme documents that should not take place. If Ofgem uncovers any of the following in connection with signatures on measure documentation, we will be minded to refuse or revoke approval of the impacted scheme measures.

Signature forgery

15.30 Any fraudulent activity including falsifying statements and falsifying signatures may be reported to the Police, Action Fraud, or other law enforcement agencies such as Trading Standards and will result in the measure in question being rejected.

Operative signatures being signed 'on behalf' of the operative

15.31 As highlighted in this guidance, signatures should be given by the appropriate party in question. In the case of documents that must be completed by the operative, the wording of the relevant scheme document will outline where operative signatures are required and it must be the operative who signs these fields. This provides Ofgem with the necessary assurance that the appropriate party has read the document, the recorded contents of the document are accurate and that by signing, they understand fully any written declaration present.

15.32 The signature should not be provided by any other individual, for example a colleague or office staff, 'on behalf' of the operative, Assessor etc.

¹¹⁹ <https://www.cps.gov.uk/legal-guidance/forgery-and-counterfeiting#:~:text=A%20person%20is%20guilty%20of,or%20any%20other%20person%27s%20prejudice.%E2%80%9D>

Copy and pasting

- 15.33 Signatures must not be copied and pasted. Wet or permitted electronic signatures must be applied individually in each case. Where copying and pasting is detected the measure in question could be rejected.
- 15.34 Householders may be required to sign multiple documents, but in doing so it provides Ofgem the assurance that the customer has seen, read and understood the contents of each document. In addition, the Great British Insulation Scheme Post Retrofit Customer and Installer Declaration is a declaration, therefore it is imperative that it is signed by the correct parties to provide assurance the details recorded are accurate.
- 15.35 Copying and pasting of signatures across documents must not take place. Administrative misunderstandings, streamlining of administrative processes or the actions of 'rogue individuals' will not be acceptable excuses for documentation that does not meet the requirements we have outlined.

Photocopying

- 15.36 Every form should be completed individually to ensure that the information provided is accurate to the property and relevant measure– photocopying or copying and pasting from other forms should not be used to complete any part of another form.
- 15.37 To reiterate, signatures must be obtained for each individual document whether it is the signature of the operative, customer, landlord, Retrofit Assessor or property management company.
- 15.38 Photocopying to duplicate a signature and apply it elsewhere is not acceptable. As above, administrative misunderstandings, streamlining of administrative processes or the actions of 'rogue individuals' will not be acceptable excuses for documentation that does not meet the requirements we have outlined.