

ECO4 and GBIS Flex Local Authority Guidance

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Email: eco@ofgem.gov.uk

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This document provides guidance for Local Authorities and Devolved Administrations who wish to participate in the Energy Company Obligation schemes:

- ECO4, and/or
- the Great British Insulation Scheme (GBIS)

It outlines how Local Authorities and Devolved Administrations can identify and refer households to suppliers, installers or managing agents under GBIS and ECO4 flexible eligibility ("Flex") routes. This guidance includes information on:

- submitting Statements of Intent,
- the different Flex routes,
- sharing Declarations and Declaration Notifications,
- evidencing eligible households, and
- our auditing process.

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Table of Contents

Introduction	5
1. Context 5	
Flexible Eligibility	5
Updates to this document	6
Contacts	7
Forms and Subsidiary Documents	7
Legislation	7
Guidance for Supply Chain	7
Relevant Consultations	7
2. Roles and Responsibilities 8	
Local Authorities	8
Suppliers and Installers	8
Ofgem	8
The Department for Energy Security and Net Zero (DESNZ)	9
TrustMark	9
Working with other stakeholders.....	9
Statement of Intent (SoI)	11
3. Publishing an SoI 11	
What should an SoI include?	11
Versioning	11
Joint SoIs	12
Identifying and Evidencing Eligible Households	14
4. Eligibility Overview and Evidencing 14	
Evidencing Requirements.....	14
5. Property Eligibility 15	
Tenure Type.....	15
SAP Band.....	15
6. Route 1: Household Income 16	
Eligibility.....	16
Evidencing	17
7. Route 2: Proxy Targeting 19	
Eligibility.....	19
Proxy 1.....	19
Proxy 2.....	20
Proxy 3.....	20

Proxy 4.....	22
Proxy 5.....	23
Proxy 6.....	23
Proxy 7.....	23
8. Route 3: Medical Referrals	24
Eligibility.....	24
Evidencing	25
9. Route 4: Bespoke Targeting	26
10. Audits	27
Declarations	28
11. Issuing Declarations	28
What should a Declaration include?	28
Unique Reference Numbers (URNs)	29
Validity	30
Project Reassignment	30
Withdrawal or Cancellation.....	30
12. Submitting Declaration Notifications	30
What should a Declaration Notification include?	31
Timings	32
Sharing Declaration Notifications with Ofgem	32
Mismatches.....	33
Data Sharing.....	33
Interaction with Funding from Other Schemes	34
Consumer Protection	35
13. Pre-Installation	35
Protection Checks for LAs.....	35
Protection Checks for Householders.....	36
14. Post Installation	44
Protection Checks for Householders.....	44
Appendix	48

Introduction

1. Context

- 1.1. ECO4 and the Great British Insulation Scheme (GBIS) aim to reduce home heating costs for fuel poor households by placing obligations on energy suppliers to deliver insulation and heating “measures” to homes.
- 1.2. ECO4 runs from 27 July 2022 to 31 March 2026.
- 1.3. GBIS runs from 25 July 2023 to 31 March 2026.
- 1.4. For more information about the schemes, visit our website:
 - [Energy Company Obligation \(ECO4\)](#)
 - [Great British Insulation Scheme \(GBIS\)](#)

Flexible Eligibility

- 1.5. The Flexible Eligibility (Flex) component of ECO4 and GBIS allows Local Authorities (LAs) to identify and refer consumers who own or privately rent their home and are considered fuel poor or vulnerable to the effects of living in a cold home.
- 1.6. Consumers can be referred via one of the four Flex “routes”:
 - [Route 1: Household Income](#)
 - [Route 2: Proxy Targeting](#)
 - [Route 3: Medical Referrals](#)
 - [Route 4: Bespoke Targeting](#) (applicable to ECO4 Flex only)

Each flex route is detailed in sections six to nine.

- 1.7. To make a referral for the scheme, LAs are able to share Declarations (see [Section 10: Issuing Declarations](#)) with suppliers to notify them of consumers eligible for ECO4 or GBIS measures.

- 1.8. The supply chain must then decide which projects to take forward. Installers will determine which measures properties are suitable to receive, and ensure the installation of measures is completed.
- 1.9. LAs must also share a Declaration Notification (see [Section 11: Submitting Declaration Notifications](#)) with us to notify of any households referred.
- 1.10. All LAs in England, Wales or Scotland can make referrals through Flex. LAs can refer households within their own area, and for other areas for whom they have been given delegated authority (see 3.16). Devolved Administrations (the Welsh and Scottish Governments) are also able to refer households to suppliers.
- 1.11. Throughout this document, we will refer to LAs as all authorities that are able to make referrals via Flex.
- 1.12. Flex remains optional for LAs, and LAs can opt to take part in Flex by publishing a Statement of Intent (SoI) (see [Section 3: Publishing an SoI](#)) on their website.

Updates to this document

Roles and Responsibilities

- Clarification added to stakeholder roles

Statement of Intent

- Simplification of policy requirements and content

Identifying and Evidencing Eligible Households

- Restructuring of content regarding Household and Property Eligibility
- Addition of certain proxy lists

Declarations

- Addition of paragraph 11.3
- Consolidation of Unique Reference Numbers (URNs) and Validity content
- Addition of Project Reassignment content

Consumer Protection

- Addition of Sections 13 and 14 pertaining to consumer protection and quality assurance standards

Contacts

If you have a question for us that is not answered in this guidance, please email:

- eco@ofgem.gov.uk for questions that relate to ECO4
- LAFlex@ofgem.gov.uk for questions regarding scheme compliance
- Laflex.Enquiry@ofgem.gov.uk for questions or issues regarding the LA Flex Digital Service Platform
- GBIS.enquiry@ofgem.gov.uk for questions that relate to GBIS
- counterfraud@ofgem.gov.uk to submit suspected incidences of fraud across the schemes

To contact an ECO obligated supplier, visit [ECO Supplier Contact Details](#).

Forms and Subsidiary Documents

- [Great British Insulation Scheme and ECO4 LA and Supplier Flex Forms and Subsidiary Documents](#)
- [ECO4 Flexible Route 4 Bespoke Targeting Guidance](#)

Legislation

- [The Electricity and Gas \(Energy Company Obligation\) \(ECO4\) Order 2022](#)
- [The Electricity and Gas \(Energy Company Obligation\) \(ECO4A\) Order 2023](#)

Guidance for Supply Chain

- [Great British Insulation Scheme Delivery Guidance](#)
- [ECO4 Delivery Guidance](#)

Relevant Consultations

- [Design of the Energy Company Obligation \(ECO4: 2022-2026\) Government Response](#)
- [Design of the Energy Company Obligation \(Great British Insulation Scheme: 2023 – 2026\) Government Response](#)
- [Ofgem ECO4 Administration Consultation Part 1](#)
- [Ofgem ECO4 Administration Consultation Part 2](#)
- [Great British Insulation Scheme and ECO4 Amendment Administration Consultation](#)
- [Great British Insulation Scheme and ECO4 LA and Supplier Flex Consultation](#)

2. Roles and Responsibilities

Local Authorities

- 2.1. Once an LA has signed and published a Statement of Intent (SoI), they are able to:
- identify eligible consumers in their own and other areas, where they have been given delegated authority
 - produce declarations to suppliers or installers for all identified households
 - sign a Data Sharing Agreement (DSA) and submit declaration notifications to us for all identified households
- 2.2. LAs must collect evidence and retain proof of eligibility for up to 3 years following the end of the scheme.

Suppliers and Installers

- 2.3. Key responsibilities for suppliers and installers include:
- ensuring that all relevant members of the supply chain, including installers, Retrofit Assessors, and Retrofit Coordinators are TrustMark registered and comply with [PAS 2035](#) and [MCS](#) standards
 - confirming whether a property is eligible via a SAP or RdSAP assessment
 - determination of which of the schemes is most suitable for a consumer's property, if eligible, and which measures are appropriate for install
 - notifying us of the measure(s) agreed upon and installed within a property
 - ensuring that scheme obligations are met, and that measures installed under GBIS Flex are delivered in line with the low-income minimum requirement
 - using their own energy debt data to identify and refer eligible customers via Supplier Flex
 - ensuring they have access to evidence collected to determine eligibility
 - retaining evidence for eligible customers referred via Supplier Flex

Ofgem

- 2.4. We, Ofgem, administer ECO4 and GBIS and produce guidance for scheme participants. We are also responsible for:
- checking declaration notifications from LAs against supplier notifications
 - conducting supplier and LA audits

- determining whether a supplier has achieved its obligations

The Department for Energy Security and Net Zero (DESNZ)

2.5. DESNZ is responsible for:

- setting the scheme's policy and legislation
- review and approval of Flex Route 4 proposals

TrustMark

2.6. TrustMark is responsible for ensuring that installers carry out work that is compliant with PAS 2035. TrustMark performs quality assurance checks to ensure that installers are PAS 2030 certified by UKAS-accredited certification bodies.

2.7. TrustMark is responsible for ensuring that Retrofit Assessors and Retrofit Coordinators comply with relevant PAS 2035.

2.8. 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.

2.9. For measures not referred to in PAS or under MCS, such as some data light measures (DLMs) and innovation measures (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.

2.10. Trustmark are the point of contact for consumers who have complaints or issues regarding quality of works or installer behaviour. See TrustMark's [Complaint Process](#) for further information.

2.11. Further information on TrustMark can be found in their [Documents for Business](#).

Working with other stakeholders

2.12. There are several delivery models that could be followed under Flex, and it is up to LAs and the supply chain to agree them.

2.13. A supplier must provide information to us on measures delivered under the schemes and, as such, the suppliers will require information from the LA to support this, including access to evidence of eligibility that they have collected.

- 2.14. Suppliers, installers, and LAs are free and encouraged to establish their own working relationships. Neither we nor DESNZ have formal processes in place for this.
- 2.15. LAs should make it clear to consumers that their inclusion in a declaration does not guarantee measures will be installed. In deciding to install measures, a supplier may depend on:
- whether a property meets SAP band eligibility criteria
 - a survey carried out by suppliers, or their agents or contractors, and the subsequent installation costs calculated
 - the energy savings that can be achieved for a property
 - whether suppliers have achieved, or are close to achieving, their targets
 - other commercial considerations
- 2.16. Consumers should be made aware that suppliers will carry out an assessment to decide which measure(s) their property should receive.

Statement of Intent (SoI)

3. Publishing an SoI

- 3.1. An LA must publish a valid Statement of Intent (SoI) (see 3.3) on its website before they can make declarations for eligible consumers (see [Section 10: Issuing Declarations](#)).
- 3.2. To complete a SoI, an LA must use the template found on our [website](#).

What should an SoI include?

- 3.3. An SoI is valid if it meets the following requirements:
- It has been published on the LA's website
 - It contains the name of the relevant LA
 - It contains an SoI publication date
- 3.4. An SoI may also contain the following information, where relevant:
- The name(s) of any LAs who have delegated authority (see 3.13 to 3.15)
 - Where the LA wishes to use Route 2 Proxy 5 (see 6.16), the name and the description of the scheme must be stated in the SoI. The description will need to include which cohort of people the LA-run scheme is helping, and how they identify consumers as low-income or vulnerable for the purposes of the [NICE Guidelines](#)
- 3.5. If the SoI indicates that Route 2, Proxy 5 will be used, but the scheme has not been named and described (see 7.17 – 7.20), or the scheme is found to not adhere to NICE Guideline NG6, Recommendation 2, Declarations can still be made for all routes other than those that rely on Route 2, Proxy 5. See **XXX** for more information on Route 2, Proxy 5.

Versioning

- 3.6. Version numbers should be included when an SoI is updated to make it clear when changes have been made.

- 3.7. We may update the SoI templates, however, we do not expect LAs to publish a new SoI on their website if an updated template is published.
- 3.8. Previous versions of the SoI should remain publicly available but clearly marked as 'superseded' or 'withdrawn', alongside the date on which the action was taken. This is to ensure that declarations submitted under previous SoI versions can be assessed and matched correctly.

Joint SoIs

- 3.9. An LA can delegate authority to another LA to provide declarations for consumers in its area. This needs to be stated in the SoI of the LA to whom authority has been delegated. Where an LA delegates authority to another LA, we suggest the delegating LA also publishes an SoI on its website, though this is not a requirement
- 3.10. An LA can receive delegated authority from multiple LAs. For example, Council A can receive delegated authority to make referrals for consumers in the areas of both Council B and Council C.
- 3.11. An LA can only delegate authority to one other LA. For example, Council A cannot delegate authority to both Council B and Council C to make referrals for consumers in its area.

Identifying and Evidencing Eligible Households

4. Eligibility Overview and Evidencing

4.1. Eligibility for Flex consists of two elements:

- **Property eligibility** which refers to whether a property:
 - Belongs to an eligible tenure type
 - Falls into an eligible Standard Assessment Procedure (SAP) band, depending on its tenure type and the Flex route being used

Property eligibility is detailed in **Section 5**.

- **Household eligibility** which refers to whether a household meets the eligibility criteria of one of the four Flex routes:
 - [Route 1: Household Income](#)
 - [Route 2: Proxy Targeting](#)
 - [Route 3: Medical Referrals](#)
 - [Route 4: Bespoke Targeting](#) (applicable to ECO4 Flex only)

Each flex route is detailed in **Sections 6 to 9**.

Evidencing Requirements

4.2. We expect LAs to collect and retain evidence of household eligibility for all consumers for whom they make a declaration. Suppliers are responsible for ensuring that they have access to this evidence, and that they collect and retain these declarations.

4.3. LAs must collect evidence and retain proof of consumer eligibility for up to 3 years following the end of the scheme.

4.4. We will not collect this evidence, but we may request it from suppliers where issues arise with projects or measures, for example, due to a mismatch (see 11.22) or during audits (see [Section 9: Audits](#)).

- 4.5. We may request declarations and any evidence to support the eligibility route up to three years after the Final Determination of the schemes, as per the wider data retention policies in ECO4 and Great British Insulation Scheme¹.
- 4.6. Where suppliers are not able to provide sufficient evidence when requested, we may reject the project or measure.

5. Property Eligibility

Tenure Type

- 5.1. Measures delivered through Flex must be delivered to private domestic premises (owner-occupied or private rented sector households). Domestic premises let by a social landlord are not eligible under Flex.²

SAP Band

- 5.2. Each property receiving measures through ECO4 or GBIS will undergo an assessment using either a [Standard Assessment Procedure \(SAP\) or Reduced Standard Assessment Procedure \(RdSAP\)](#) prior to the measures being installed. SAP and RdSAP assessments are used to determine the property’s SAP band, which indicates the energy efficiency rating of a property.
- 5.3. Properties must meet route- and tenure-specific SAP band eligibility criteria to receive measures via Flex. Table 1 provides an overview of eligible SAP bands and tenure types for each ECO4 and GBIS Flex Route.

Table 1: Overview of Eligible SAP bands and Tenure Types for Flex Routes

ECO4

Route	Tenure Type	Eligible SAP Bands
Route 1, 3 & 4	Owner-occupied	D to G
	Private rented sector (PRS)	E to G

¹ Further information can be found in the [ECO4](#) and [GBIS](#) Privacy Notices.

² For more information on the definition of a social landlord, see Schedule 2 of the [ECO4 Order](#).

Route 2	Owner-occupied	E to G
	Private rented sector (PRS)	E to G

GBIS

Route	Tenure Type	Eligible SAP Bands
Route 1 & 3	Owner-occupied	D to G
	Private rented sector (PRS)	D, E (including F and G if exempt from MEES*)
Route 2	Owner-occupied	E to G
	Private rented sector (PRS)	E (including F and G if exempt from MEES)
Route 4	N/A	N/A

*MEES = [*Minimum Level of Energy Efficiency Standard*](#)

5.4. LAs are not responsible for checking SAP band or tenure type eligibility.

Installers will determine whether a property meets SAP band and tenure type eligibility requirements following their initial SAP or RdSAP assessment. If eligible, the installer will then decide the appropriate measures to install, and the scheme that the property should be referred through (i.e. ECO4 or GBIS).

5.5. Consumers should be informed that a SAP or RdSAP assessment will need to be carried out within their home, and that their eligibility for the scheme may be impacted by the outcome of this assessment.

6. Route 1: Household Income

Eligibility

6.1. Households with a gross annual income of **less than £31,000** are eligible via Flex Route 1. This threshold applies irrespective of the property size, composition, or regional location.

6.2. This is reached by combining the gross annual income of all adults aged 18 or older living in the home on a permanent basis. This includes lodgers and relatives.

6.3. We make the following interpretations of income: Gross annual income is all money that the members of a household regularly³ earn and receive before taxes and other deductions, where applicable.

6.4. This includes the following list of regular income sources, such as:

- Earnings from employment and self-employment (including 'furlough')
- Pension payments, including State Pension
- Interest earned on savings
- Capital gains from shares
- Dividend payments
- Benefits in Kind (employer benefits)
- Income from owned and rented properties
- [Taxable and non-taxable benefit payments](#) (inc. Child Benefit)

6.5. This does not include sources of irregular income, such as:

- Inheritance payments
- Prizes received from premium bonds
- Gifted payments (e.g. payments from family members)
- 25% tax-free pension lump sum payments
- Student loans or grants
- Transfer of money between one's own personal accounts
- Casual or miscellaneous payments amounting to a total of less than £1,000 per year (e.g. sale of personal items or chattel)

Evidencing

6.6. All relevant income sources included in a household's gross annual income should be evidenced. Suitable evidence types for this include:

- Tax returns, including self-assessment tax returns

³ Regular earnings refer to payments received on a recurring basis i.e., weekly, monthly, annually.

- Payslips
- Pension statements
- Benefit statements
- P60 or P45 documentation
- P11D documentation
- L17 Statement of Earnings
- SA302 letter
- A contract of employment which displays an annual salary figure

6.7. Confirmation should also be provided for the number of adult residents at the address. Suitable evidence types for this include:

- Council tax letters
- Tenancy agreements
- Mortgage statements
- Electoral register statements
- A combination of the following which demonstrate matching addresses for recipients:
 - Utility bills
 - Benefit letters
 - Financial statements
 - HMRC or DWP letters
 - GP or Dental registration letters

6.8. These lists are not exhaustive and other evidence types can be used if the sources listed above are unavailable.

6.9. To ensure compliance standards are met, we recommend that the evidence provided is a combination of different types of documents to corroborate a household's gross annual income, where possible.

6.10. A self-declaration given by a member of the household cannot be relied upon as standalone evidence of gross annual income.

- 6.11. All documentation should be dated no more than 12 months before the day on which the Declaration is signed. The most recently available version of each document should be used, where possible.
- 6.12. If no evidence is available from this period, we recommend using the most recent evidence available from before this time period.

7. Route 2: Proxy Targeting

Eligibility

- 7.1. Households that meet **at least two** of the proxies listed below are eligible via Flex Route 2:

- **Proxy 1:** Living in a Lower Layer Super Output Area (LSOA)
- **Proxy 2:** Entitlement to a low income Council Tax reduction
- **Proxy 3:** Vulnerability on the grounds of certain health conditions
- **Proxy 4:** Eligibility for free school meals
- **Proxy 5:** Support from an existing LA scheme
- **Proxy 6:** Referral from Citizens Advice or energy supplier
- **Proxy 7:** Identified through energy supplier debt data

- 7.2. The following proxy combinations cannot be used:

- Proxy 1 with Proxy 3
- Proxy 7 with Proxy 5 or 6

Proxy 1

- 7.3. Proxy 1 refers to consumers living in a Lower Layer Super Output Area (LSOA) within one of the following Indices of Multiple Deprivation:

- **England:** An area identified as a LSOA in the first, second or third decile on the [Index of Multiple Deprivation for 2019](#)⁴
- **Wales:** An area identified as a LSOA in the first, second or third decile on the [Welsh Index of Multiple Deprivation 2019](#)
- **Scotland:** A “data zone” which is identified as being in the first, second or third decile on the [Index of Multiple Deprivation for 2020](#)

7.4. To evidence this, a screenshot from the LA confirming the consumer’s property is situated within an eligible LSOA area can be used, supported by [Office for National Statistics \(ONS\) data](#).

Proxy 2

7.5. Proxy 2 refers to consumers that are entitled to a Council Tax reduction on the grounds of low-income.

7.6. This does not include a Council Tax Single Person Discount.

7.7. To evidence this, suitable evidence types include:

- a copy of council tax bill featuring the reduction (i.e. a photo, email, or PDF with name and address)
- a letter confirming reduction from LA

Proxy 3

7.8. Proxy 3 refers to consumers that are considered to be vulnerable to the cold under the [National Institute for Health and Care Excellence \(NICE\) Guidance NG6: Recommendation 2](#) for a reason other than their low-income. This includes the following conditions:

- Cardiovascular conditions
- Respiratory conditions

⁴ These deciles can be found in “File 7: all ranks, deciles and scores for the indices of deprivation, and population denominators”.

- Mental health conditions
- Disabilities
- Older age (65 years and older)
- Caring for young children (from newborn to school age)
- Pregnancy

7.9. To evidence this, suitable evidence types are:

- A signed referral letter from a doctor, GP, or other relevant health professional, shared from a valid NHS email address
- Or at least one of the following evidence types:
 - An NHS Summary Care Record that states the patient suffers from, or receives medication for, a health condition listed in the NICE guidance. This must be authenticated by a GP practice stamp.
 - For those with cardiovascular or respiratory conditions:
 - Hospital diagnosis letters
 - Social worker referral letters
 - Copies of repeat prescriptions
 - Copies of referral letters to groups that help people with these conditions
 - For those with a disability:
 - Personal Independence Payment (PIP) award notice
 - Disability Living Allowance (DLA) award notice
 - Attendance Allowance award notice
 - For those aged 65 or above:
 - Passport
 - Birth certificate

- Copy of bus pass
 - Pension statement
 - For households with young children (aged 5 or under):
 - Child's passport
 - Child's birth certificate
 - For pregnancy, a MAT B1 form which demonstrates proof of pregnancy on the date that the LA signed the declaration.
- 7.10. These lists are not exhaustive and other evidence types can be used if the sources listed above are unavailable.
- 7.11. To ensure compliance standards are met, we recommend that the evidence provided is a combination of different types of documents, where possible.
- 7.12. All documentation should be dated no more than 12 months before the day on which the Declaration is signed. The most recently available version of each document should be used, where possible.
- 7.13. If no evidence is available from this period, we recommend using the most recent evidence available from before this time period.
- 7.14. In recognition of health professional's time and effort, and to reduce administrative burden, we have published a [GBIS and ECO4 Flex NHS Referral Letter Template](#) on our website. The health provider can use their own letter template, if preferable.

Proxy 4

- 7.15. Proxy 4 refers to a household with a child that is eligible for free school meals on the grounds of low income⁵.
- 7.16. Suitable evidence for this includes [Eligibility Checking Service \(ECS\)](#) documentation showing eligibility for free school meals due to low-income provided by the Department for Education or the child's school.

⁵ The child must be eligible for free school meals under [Section 512ZB\(4\) of the Education Act 1996](#) or [Section 53 of the Education \(Scotland\) Act 1980](#). Further information can be found at [GOV.UK](#).

Proxy 5

- 7.17. Proxy 5 refers to a consumer that is supported by a scheme established by the LA, which finds them to be living on low-income and vulnerable to the cold under [NICE Guideline NG6](#).
- 7.18. This scheme must be named and described within the LAs SoI, and LAs must provide the name and a short description of the scheme they wish to use.
- 7.19. An LA officer is responsible for checking and verifying associated evidence submitted to them before issuing a declaration. A third party cannot issue declarations on behalf of an LA.
- 7.20. Suitable evidence for this includes a signed letter from either the scheme coordinator or the LA, which verifies the consumer's eligibility for the nominated scheme.

Proxy 6

- 7.21. Proxy 6 refers to a consumer who has been identified as struggling to pay their gas or electricity bills, and has been referred to the LA by either their energy supplier, [Citizens Advice](#), or [Citizens Advice Scotland](#).
- 7.22. The referee organisation does not need to identify a second proxy for which the consumer is eligible.
- 7.23. The referee organisation must provide a signed referral letter to the LA confirming the consumer they have identified. An [ECO4 and GBIS Flex Citizens Advice Referral Letter Template](#) can be found on our website.
- 7.24. Suitable evidence for this includes the signed referral letter, accompanied by proof of gas and / or electricity debt.

Proxy 7

- 7.25. Proxy 7 refers to consumers identified through energy supplier debt data. This route enables obligated suppliers to use their own debt data to identify either:
- **Non-Pre-Payment Meter customers:** These are customers who have both:
 - been in debt for more than 13 weeks, ending with the day on which the declaration is made, **and**

- are in a debt repayment plan with their energy supplier, or repaying their fuel debt through third party deductions
 - **Pre-Payment Meter customers:** These are customers who have either:
 - self-disconnected or are in receipt of supplier Discretionary or Friendly credit within the last 13 weeks ending with the day on which the declaration is made, **or**
 - a debt repayment plan with their energy supplier or are repaying their fuel debt through third party deductions
- 7.26. Where a consumer has been referred to the LA for support by their energy supplier using debt data elements, a supplier is able to sign the Declaration under Supplier Flex, so long as the second proxy in use is not Proxy 5 or 6.
- 7.27. This proxy can only be combined with one of proxies 1-4.
- 7.28. Suppliers can also refer customers directly to us based on their own debt data, independent from the LA. They will need to evidence this through their own Project or Measure Notification. They will also need to evidence that the customer's household meets one of proxies 1-4.

8. Route 3: Medical Referrals

Eligibility

- 8.1. Households with a person suffering from a severe or long-term health condition, which is adversely affected by living in a cold home, are eligible via Flex Route 3.
- 8.2. The person's severe or long-term health condition must be due to:
- A cardiovascular condition
 - A respiratory disease
 - Limited mobility
 - Immunosuppression
- 8.3. The LA must provide a declaration certifying that it has received a referral from one of the following:

- A person registered in the General Practitioner (GP) Register
- A Scottish Health Board
- A Welsh Health Board
- An NHS Foundation Trust
- An NHS Trust

Evidencing

8.4. To evidence that a referral has been made, a declaration must be provided by a relevant healthcare provider.

8.5. A relevant healthcare provider refers to:

- **A person listed in the General Practitioner Register:** This includes any GP employed in an NHS or private practice.
- **An employee of an NHS Trust or NHS Foundation Trust:** This includes health practitioners working within a hospital or clinic owned by an NHS Trust or NHS Foundation Trust⁶.
- **An employee of an NHS Health Board**

8.6. A [GBIS and ECO4 Flex NHS Referral Letter Template](#) is available on our website. Health providers can use their own letter template if they prefer.

8.7. This declaration can be provided via either:

- **An email** shared directly from a valid NHS email address by the relevant healthcare provider
- **A letter** which is:
 - Printed on headed paper, indicating the practice, clinic or hospital making the referral, and

⁶ A directory of all NHS Trusts and NHS Foundation Trusts can be found [here](#).

- Authenticated with a GP surgery stamp (where relevant)
- 8.8. The declaration must state that the relevant healthcare provider signing the letter considers someone in the household to be suffering from one of the four health conditions listed in paragraph 7.2, and that the health of the person is adversely affected by living in a cold home.
- 8.9. We expect the relevant health provider to have spoken to, personally assessed, and viewed the records of the consumer prior to their referral, in order to confirm their vulnerability to living in a cold home.

9. Route 4: Bespoke Targeting

- 9.1. Route 4 provides the opportunity for LAs to propose new methods for identifying low-income and vulnerable consumers.
- 9.2. Route 4 is available through **ECO4 Flex only**.
- 9.3. An application must be submitted to the Department of Energy Security and Net Zero (DESNZ) and needs to demonstrate that:
1. The proposed methodology is more effective at identifying fuel poor consumers than the criterion offered in Routes 1 and 2,
 2. More than 50% of the premises that meet the criteria are not in receipt of the following benefits:
 - Income based Jobseekers Allowance (JSA)
 - Income related Employment and Support Allowance (ESA)
 - Income Support (IS)
 - Pension Credit Guarantee Credit (PCGC)
 - Universal Credit (UC)
 - Housing Benefit
 - Pension Credit Savings Credit (PCSC)
 - Child Benefit
 3. And at least either:

- a. 75% of the premises that meet the criteria are owner-occupied premises occupied by at least one person living in fuel poverty; or
 - b. 90% of the premises that meet the criteria are private rented premises occupied by at least one person living in fuel poverty.
- 9.4. To submit an application, LAs should share an [application form](#) with ecoteam@energysecurity.gov.uk for assessment and approval.
- 9.5. Once DESNZ has approved an application, a reference number will be provided. This should be notified to us for all relevant projects. The 10% uplift is only awarded subject to all criteria and minimum requirement rules being met.
- 9.6. See the [ECO4 Flexible Route 4 Bespoke Targeting Guidance](#) for further information.

10. Audits

- 10.1. Suppliers are expected to provide and hold sufficient evidence (see 4.10) for all Flex projects and measures to ensure eligibility and compliance requirements have been met. As such, we may send suppliers an annual sample of projects and measures that they have notified, and request that they carry out due diligence checks to ensure they comply with scheme requirements.
- 10.2. Where we find evidence held and provided by the supplier to be insufficient or incorrect, the supplier may look to review this evidence with LAs. Compliance action may be taken if not rectified.
- 10.3. Where Scottish and Welsh Governments submit SoIs and declarations on behalf of LAs, they will be expected to carry out their own checks to ensure LAs have complied with scheme guidance.

Declarations

11. Issuing Declarations

- 11.1. LAs must issue a 'declaration' for any consumers they wish to refer for support under Flex. Declarations are sent by an LA to a supplier, installer, or managing agent (as appropriate).
- 11.2. A declaration confirms that a consumer, or multiple consumers, are considered eligible under one of the four referral routes (see 4.2), and that evidence has been collected to demonstrate this.
- 11.3. An LA can choose which Declarations it wishes to sign. An LA does not have to sign or approve any Declaration that they do not feel comfortable in signing.
- 11.4. Multiple consumers can be referred on a single declaration, provided each individual referral has its own Unique Reference Number (URN) (see 11.11).
- 11.5. An LA can only issue declarations once they have published an SoI (see [Section 3: Publishing an SoI](#)).
- 11.6. An LA can also issue declarations for consumers of other areas where they have been given delegated authority. This should be made clear in the declaration.
- 11.7. A [Great British Insulation Scheme and ECO4 Flex LA Declaration to Supplier template](#) is available on our website. LAs can use their own declaration template if preferable.
- 11.8. [Figure 1](#) provides a step-by-step walkthrough of the Flex process, including the issuing of Declarations.

What should a Declaration include?

- 11.9. A declaration must contain the following information:
 - Name of the LA
 - Name of LAs that are being acted on behalf of (if relevant)
 - The schemes for which the LA has published an SoI (i.e. ECO4 Flex only or a combined SoI for ECO4 and GBIS Flex)

- SoI publication date
- SoI version number
- SoI website link
- Unique Reference Number (URN)
- Address
- LA Officer name and contact details
- LA Officer signature (if required)
- Date on which the consumer was confirmed as eligible

11.10. Whilst we do not require a signature on the declaration, suppliers may still require one for their own auditing and administrative processes. This will be agreed with the LA, where applicable.

11.11. When sharing declarations, LAs are not required to specify which scheme (ECO4 or GBIS) is most suitable for a consumer's property. It is the responsibility of the supplier or installer to determine which scheme and measure(s) are most appropriate for a property.

Unique Reference Numbers (URNs)

11.12. An LA must create a Unique Reference Number (URN) for each project within a declaration. Each project requires a new and unique URN.

11.13. Once a URN has been used within a submitted Declaration, this URN must not be used again, even if the project is withdrawn, cancelled, or rejected, or a second Declaration is submitted for the same property.

11.14. The URN must follow the format: *ANNNNNNNNN-NNNNN*

11.15. The first section of the URN ('ANNNNNNNNN') must be the 9-digit Office for National Statistics (ONS) code assigned to the LA. For example, the ONS code for Liverpool is E08000012. All [Local Authority codes](#) and [Combined Authority codes](#) can be found on the ONS website.

11.16. The second section of the URN ('NNNNN') must represent the number of the declaration notification in the order it has been made. For example, the first declaration notification can be 00001.

11.17. To make declarations on behalf of another LA, the ONS code must represent the LA making the declaration, rather than that of the delegating LA. The URN format is the same for both ECO4 and GBIS Flex.

Validity

11.18. The declaration must be issued within the **12-month period ending with the day immediately preceding the day on which the measure is completed**. There is no requirement to reassess a consumer's eligibility once a Declaration has been issued, so long as the project is completed within one year of the Declaration being issued, and this was done so under a valid SoI.

11.19. If the project is not completed within 12 months, then a new Declaration will need to be resubmitted with a new URN and evidencing material.

Project Reassignment

11.24. An LA is able to reassign the project to a new installer. This may be for reasons such as householder request or project inactivity. Project reassignment does not require a new Declaration or new URN, so long as the Declaration for the project remains valid.

11.25. If the initial installer has submitted a project notification to Ofgem, we request that this is withdrawn to allow the new installer to provide us the most up-to-date information for the project, where possible..

Withdrawal or Cancellation

11.26. The LA does not need to notify us if a Declaration is withdrawn, or a project is cancelled.

12. Submitting Declaration Notifications

12.1. LAs share Declaration Notifications with us to inform us of Declarations that they have shared with suppliers.

- 12.2. They allow us to ensure that measures are being received by consumers found to be in fuel poverty or vulnerable to a cold home.
- 12.3. A [Great British Insulation Scheme and ECO4 Flex Declaration Notification Template](#) can be found on our website. This must be used for declaration notifications, and alternative templates will not be accepted.

What should a Declaration Notification include?

12.4. A Declaration Notification should contain the following information:

- Unique Reference Number (URN)
- Referrals made outside of the LA's area (if relevant)
- Referral route
- Route 2 proxies (if relevant)
- Route 4 application number (if relevant)
- Address
- LA area code⁷
- Confirmation that the LA has been consulted by the supplier or installer about the carrying out of measures in a given property before the day on which the measure(s) is completed
- Date of householder eligibility (i.e. the date on which the Declaration was signed)
- SoI publication date

⁷ See Tab 3.4 of the 'Headline HEE release tables' for LA area codes:
<https://www.gov.uk/government/collections/household-energy-efficiency-national-statistics>

- SoI webpage link
- The schemes for which the LA has published an SoI (i.e. ECO4 Flex only or a combined SoI for ECO4 and GBIS Flex)

12.5. The template can be completed by manually adding data or through clicking on the drop-down boxes.

12.6. [The ECO4 and Great British Insulation Scheme Flex Data Dictionary](#) provides a description of all fields within the template, and general information to assist LAs in completing Declaration Notifications.

12.7. A signature is not required for the declaration notification.

Timings

12.8. Declaration notifications should be sent to us before the installation of measures is complete, though they do not need to be processed by us by that date.

12.9. LA declarations will remain valid until whichever date is soonest:

- a period of one year from the date of completion, or
- until 31 March 2026

12.10. [Figure 1](#) illustrates the Flex process, including the issuing of Declaration Notifications.

Sharing Declaration Notifications with Ofgem

12.11. LAs can share declaration notifications with us via email or via the Flex Digital Platform. For more information, please email laflex@ofgem.gov.uk.

12.12. Once an LA has submitted a declaration notification to us, they should receive an auto-response as proof of receipt.

12.13. We do not share information about declaration notifications with suppliers or installers. LAs and the supply chain should communicate directly regarding declaration notifications submissions, updates, and errors.

Mismatches

12.14. If data submitted to us by suppliers does not match the declaration notification, we will notify the supplier of the error to enable correction.

12.15. If the mismatch is not remediated, we will be minded to reject the measure.

Below, Table 2 presents some examples of causes of mismatches and the remediation steps.

Table 2: Declaration mismatches and remediation steps

Error	Remediation steps
<p>Supplier notifies a project under Flex, but the project notification details do not match the Declaration Notification URN or address.</p> <p>This could occur if an LA has not submitted the declaration notification prior to the supplier notifying the project.</p>	<p>A solution may be that the LA notifies the supplier that the declaration notification has not been submitted. The project notification could then be held by us until the next processing round to give time for Declaration Notification to be submitted and flagged to supplier.</p>
<p>Project uses the same URN as a previous project.</p>	<p>Supplier would need to reassess their Project Notification to ensure that each measure has been installed with a separate URN.</p>

Data Sharing

12.16. LAs must adhere to the requirements of the [UK General Data Protection Regulation \(UK GDPR\)](#) and the [Data Protection Act 2018](#) when sharing and processing data between parties.

12.17. To share Declaration Notifications with Ofgem, a Data Sharing Agreement (DSA) must be in place to ensure data protection is upheld.

12.18. Members of the [Local Government Association \(LGA\)](#) can request a DSA template directly from the LGA. Non-members can request a template at ECO@ofgem.gov.uk.

12.19. These templates require only a signature from us and the LA to become effective.

12.20. If changes are made to the template, reapproval by us will be required and may cause delays.

12.21. We are unable to create or approve of data-sharing agreements between LAs and the supply chain.

Interaction with Funding from Other Schemes

12.22. Funding for measures delivered under ECO4 or GBIS Flex cannot be blended with other government schemes or grants.

12.23. Any measures delivered to a property from an alternative scheme must be installed either before an ECO4 or GBIS project begins, or after the project is complete.

12.24. This requirement includes, but is not limited to, the following schemes:

- [Warm Home Discount \(WHD\)](#)
- [Home Upgrade Scheme \(HUG\)](#)
- [Boiler Upgrade Scheme \(BUS\)](#)
- [Social Housing Decarbonisation Fund \(SHDF\)](#)

12.25. Consumers in receipt of payments from the following schemes are still eligible for ECO4 or GBIS measures, however, payments received under these schemes may be impacted by the installation of new heating measures:

- [Domestic Renewable Heat Incentive \(DRHI\)](#)
- [Feed-In Tariff \(FIT\)](#)

Consumer Protection

13. Pre-Installation

- 13.1. Throughout all stages of the project, compliance with consumer and technical standards is the responsibility of the contractor(s) – as overseen by their scheme provider and TrustMark. However, to further mitigate risk of fraud and malpractice, checks can be performed to promote compliance with the relevant standards.
- 13.2. Below, we list checks that an LA or consumer may carry out, where they consider it appropriate. **These checks are not required to be taken by LAs or the consumer**, but many reflect requirements of TrustMark Registered Businesses as set out in Section 3 of the [TrustMark Code of Conduct](#) and [Section 10 of the TrustMark Framework Operating Requirements](#).

Protection Checks for LAs

General

- 13.3. A contractor is the business that is responsible, and receives funding, for a given project under ECO4 or GBIS. Contractors must be TrustMark registered to take part in ECO4 or GBIS Flex. An LA or consumer can determine if a contractor is TrustMark registered via the search tool available on the [TrustMark website](#).
- 13.4. Contractors may subcontract parts of the project out to other installers, depending on the suite of measures they are looking to install. The contractor is responsible for ensuring any subcontractors meet the relevant standards, quality assurance and consumer protection requirements.
- 13.5. An LA can choose which Declarations it wishes to sign, and it does not have to approve any Declaration that they do not feel comfortable in signing. This includes any Declarations that they suspect to be fraudulent or against the intent of the scheme, or Declarations they have received from a contractor that they do not consider to meet sufficient standards.
- 13.6. An LA may decide to limit the signing of declarations to a list of approved contractors. If published on a relevant webpage, this list can be used to inform consumers of the approved businesses in their local area.

- 13.7. AN LA can report any suspected fraud or gaming across the schemes at counterfraud@ofgem.gov.uk. This can relate to any actor, document, or process across the scheme, and no evidence is required to raise concerns.
- 13.8. Any businesses found to be in breach of scheme standards may be suspended from work on Government-backed schemes by TrustMark, including eligibility to work on future schemes.

Protection Checks for Householders

General

- 13.9. ECO4 and GBIS are not grant-based schemes. Though consumer contributions are not expected, they may be requested in some cases, and different contractors will offer varied levels of funding for different suites of measures.
- 13.10. To find the best deal, it is recommended that consumers speak to multiple companies to determine the company, cost, and measures that are most suitable for them.
- 13.11. A consumer does not have to agree to, or sign a contract for, any works they do not consider suitable for their home.
- 13.12. A consumer should ensure that they have the correct Building Regulations, planning and environmental permissions in place for the work to take place at the property prior to any work.
- 13.13. Relevant documents to read prior to agreeing to any works include:
- [TrustMark Consumer Charter](#): This document sets out the rights and responsibilities of anyone receiving advice, installations or services carried out by a TrustMark Registered Business.
 - [A Guide to Retrofitting your Home](#): This document provides an overview of the retrofit process, as well as providing energy tips, advice on determining the right works for a property, information on making a complaint, and information on energy efficiency and low carbon technologies.

Prior to Signing a Contract

13.14. Prior to signing a contract, the contractor is expected to provide the following information to the consumer:

13.15. **Costs:** Though consumer contributions are not expected, they may be requested in some cases. The consumer is to be informed of any payments that will be incurred throughout the project. If any payments are required, the contractor is expected to provide information of any deposits or stage payments before a contract is signed (see 13.6 for more information). The consumer is not to be asked to make a full payment for the measures upfront⁸.

- **Servicing and maintenance:** Contractors are expected to provide details on whether a measure will require any regular service or maintenance, how much this is likely to cost, and whether this will impact the guarantee provided⁹.
- **Subcontractors:** If any work will be carried out by subcontracted parties, the contractor is expected to provide details on the businesses that will be carrying out this work, the measures that they will be responsible for, and the anticipated timescales for their work¹⁰. The contractor is responsible for the conduct and work of any sub-contractors they employ¹¹.
- **Issue remediation:** The contractor is expected to inform the consumer of their complaints process and their Alternative Dispute Resolution service¹². They are also expected to ensure that all staff and sub-contractors are informed of what to do if they receive a complaint from a consumer¹³.
- **An installation plan:** An installation plan may be developed for the project, which should inform the customer of what works will be carried out, and what the timescales for this work should be¹⁴.

⁸ See "Your contract with the customer" on Page 7, Section 3 of the [TrustMark Code of Conduct](#)

⁹ See "Your contract with the customer" on Page 7, Section 3 of the [TrustMark Code of Conduct](#)

¹⁰ See "Your contract with the customer" on Page 7, Section 3 of the [TrustMark Code of Conduct](#)

¹¹ See "Managing sub-contractors" on Page 6, Section 2 of the [TrustMark Code of Conduct](#)

¹² See Page 3 of the [Trustmark Customer Charter](#)

¹³ See "What if things go wrong?" on Page 6, Section 2 of the [TrustMark Code of Conduct](#)

¹⁴ See "Your contract with the customer" on Page 7, Section 3 of the [Trustmark Code of Conduct](#)

- **Independent advice:** The contractor is expected to signpost the customer to relevant independent advice prior to signing a contract¹⁵.

Prohibited Sales Techniques

13.16. As per the Consumer Rights Act 2015, the following practices are banned and, if used by a contractor, can constitute a criminal offence¹⁶:

- Displaying a quality mark without authorisation
- Falsely claiming to be approved or endorsed by an accreditation body (e.g. TrustMark registered)
- Aggressive doorstep selling (e.g. refusing to leave when asked) and other high pressure selling techniques
- Promoting limited offers (e.g. claiming that a contract must be signed in order to receive a certain price)
- Telling the customer that if they do not agree to the work, their livelihood will suffer
- Inferring that a customer's statutory rights (see 14.9) are a feature that only they offer

13.17. The following practices are also discouraged, as per TrustMark's Code of Conduct¹⁷:

- Pushing for a contract to be signed before leaving the home
- Attempting to persuade a customer who has said no or is having doubts
- Staying too long at a customer's home

¹⁵ See Page 3 of the [Trustmark Customer Charter](#)

¹⁶ See "Practices banned in all circumstances?" on Page 13, Section 4 of the [Trustmark Code of Conduct](#)

¹⁷ See "Aggressive practices" on Page 13, Section 4 of the [Trustmark Code of Conduct](#)

- Cold calling where prohibited, or against the behest of the customer

Financial Protection and Guarantees

13.18. All TrustMark Registered Businesses are expected to provide customers with financial protection for any completed works carried out in and around a home¹⁸. This is intended to cover a consumer against certain risks were a business to cease trading. Guidance can be found on the [TrustMark website](#).

13.19. The financial protection offered is expected to cover pre-payments, deposits, products, and workmanship.

13.20. Where a policy is transferred to a new homeowner, the homeowner will not be disadvantaged by any failure to notify the financial protection provider of this transfer¹⁹.

13.21. Where a consumer makes a prepayment, the business must ensure a suitable method is applied to protect the consumer's investment²⁰.

13.22. The following measures are required to be accompanied by a TrustMark-approved 25 year guarantee²¹:

- External Wall Insulation (EWI)
- Internal Wall Insulation (IWI)
- Cavity Wall Insulation (CWI)
- Hybrid Wall Insulation
- Park Home Insulation

¹⁸ See 10.2 of TrustMark [Framework Operating Requirements](#)

¹⁹ See 10.2.7 of TrustMark [Framework Operating Requirements](#)

²⁰ See 10.2.9 of TrustMark [Framework Operating Requirements](#)

²¹ See list of TrustMark [Approved Financial Protection Mechanisms](#)

- Room-in-Roof Insulation
- Under Floor Insulation

13.23. The following measures are required to be accompanied by at least two years of financial protection, plus any additional requirements made by the scheme provider²²:

- Loft Insulation
- Electrical Storage Heating
- Heating Controls
- Microgeneration
- Glazing
- Flat roof insulation
- Draught proofing

Signing a Contract

13.24. A contractor must provide a written quotation to the householder before the project commences. The written quotation is expected to include the following information²³:

- The contractor's business name, contact information, company registration, VAT numbers, and TrustMark registration
- The customer's name, address, and contact information
- An itemised description of the work that will be carried out, including a breakdown of costs and total price

²² See Section 10 of the [TrustMark Framework Operating Requirements](#)

²³ See "Your paperwork" on Page 5, Section 2 of the [TrustMark Code of Conduct](#)

- How long the job will take
- Any deposit required
- Details of stage payments
- Any guarantee or warranty the contractor will provide
- Any access the contractor will need at the property (e.g. to water or electricity)

13.25. The contractor must also provide a clear and detailed contract setting out what the work will entail. This still applies when a project requires no payments from the consumer. A contract is expected to provide the following information²⁴:

- The contractor's business name, contact information, company registration, VAT numbers, and TrustMark registration
- An itemised description of the work that will be carried out, including a breakdown of costs and total price
- How long the job will take
- The correct Building Regulations, planning and environmental permissions
- Details of how any contract variations will be dealt with
- The contractor's customer feedback and complaints procedure
- The contractor's business terms and conditions
- Any after sales service or guarantee

Preparing for Installation

²⁴ See "Your paperwork" on Page 5, Section 2 of the [TrustMark Code of Conduct](#)

13.26. The contractor is expected to discuss the following access arrangements with the customer prior to work commencing²⁵:

- How to keep valuables out of the way
- How to keep children and pets safe

13.27. How to best consider the needs of all residents in the property

- Which entrance and exit to use
- Which facilities to use, such as bathrooms, kitchen, and waste disposal
- Which utilities will be needed, such as water and electricity.

13.28. The contractor may carry out a survey of the home. If a survey of the property is required, the contractor is expected to inform the consumer of the following²⁶:

- Who will be carrying out the survey
- The timescale
- How it can be rearranged if there is a problem
- Where the surveyor will need to look.

13.29. If a survey finds that work cannot be carried out at the property, the contractor is expected to inform the customer, cancel the contract, and refund any deposit or payments made²⁷.

During Installation

²⁵ See "Surveys" on Page 7, Section 3 of the [TrustMark Code of Conduct](#)

²⁶ See "Your contract with the customer" on Page 7, Section 3 of the [TrustMark Code of Conduct](#)

²⁷ See "Always use competent surveyors" on Page 8, Section 3 of the [TrustMark Code of Conduct](#)

13.30. The consumer can exercise their right to change their mind about the works at any point throughout the installation process. In this scenario, the contractor must then remove any goods and waste from the property²⁸.

13.31. The contractor is expected to provide regular updates to the consumer through the installation process, and to ensure the following²⁹:

- A form of identification is carried by each member of staff
- Protective coverings are used to look after the customer's home
- Any tools and materials are safely stored at the property
- The work is minimally disruptive to the home and occupants
- Extra time is set aside to explain the works to vulnerable consumers, and
- Where a customer has a third party to support them, time is taken to inform the third party of project updates

13.32. If an issue occurs, the contractor is expected to provide an updated installation plan which outlines any changes to the works that will be carried out, and how this will impact project timescales³⁰.

Retrofit Actors

13.33. In line with PAS2035:2023 standards, a project must be overseen by a Retrofit Coordinator from start to finish³¹. The Retrofit Coordinator is intended to protect the interests of both the householder and the public throughout this process.

²⁸ See "During the works" on Page 8, Section 3 of the [TrustMark Code of Conduct](#)

²⁹ See "During the works" on Page 8, Section 3 of the [TrustMark Code of Conduct](#)

³⁰ See "During the works" on Page 8, Section 3 of the [TrustMark Code of Conduct](#)

³¹ See Section 6 of [PAS 2035:2023 Specification and Guidance](#)

13.34. The project will be overseen by a **Retrofit Coordinator**, who project manages a retrofit project and oversees its assessment. They may be supported by the following actors:

- **Retrofit Assessor:** Assesses the property to determine which measures are most appropriate, in light of its physical properties and constraints
- **Retrofit Designer:** Designs the package of measures suitable for the property
- **Retrofit Installer:** Undertakes the physical installation of measures in the property
- **Retrofit Evaluator:** Monitors and evaluates the project, to provide feedback to the householder and contractor

14. Post Installation

Protection Checks for Householders

Handover

14.1. As per PAS2035:2023 standards³², the handover for a project must include:

- A physical inspection of the installed measures and an explanation of their function and operation, including demonstrations of how to operate any components, devices or controls
- A visual check to ensure the consumer is able to operate components and controls
- Information about care of the installed measure, such as any regular maintenance of the measure for it to operate safely and efficiently, and how this may impact its guarantee

³² See 11.1.2 of [PAS 2035:2023 Specification and Guidance](#)

- Information on how to operate the measure to facilitate any reduction in energy use
- Provision of any relevant documentation, such as:
 - Test certificates
 - Commissioning records
 - Instruction manuals
 - Warranty and guarantee certificates

14.2. If any issues are identified with the work post installation, the contractor is expected to provide a schedule for the remedial works that will take place³³.

14.3. The contractor is expected to inform the customer if there will be any ongoing measurement, monitoring, or inspections of the work³⁴.

14.4. The contractor is expected to provide the consumer with an invoice which includes the following information³⁵:

- The date of project completion
- A unique identification number
- The contractor's company name, address and contact information
- The customer's name and address
- A clear description and breakdown of any costs charged for, and the total amount payable

³³ See "At the end of the job" on Page 8, Section 3 of the [TrustMark Code of Conduct](#)

³⁴ See "At the end of the job" on Page 8, Section 3 of the [TrustMark Code of Conduct](#)

³⁵ See "Your invoice" on Page 9, Section 3 of the [TrustMark Code of Conduct](#)

- Details of payment methods

14.5. The contractor must signpost to clear energy saving advice for products and measures installed. Any energy performance claims made by the contractor must be accurate, and using figures representative of the consumer's home³⁶.

Statutory Rights

14.6. The Consumer Rights Act 2015 sets out a series of 'statutory rights' for consumers, which are additional to any guarantees or warranties provided. In line with these rights, any products the contractor provides must³⁷:

- Be of satisfactory and durable quality
- Be suitable for the customer's needs
- Meet the description advertised
- Be safe for use
- Be installed correctly

Issue Remediation

14.7. If a measure installed does not satisfy any of the consumer's statutory rights (see 14.6), the consumer has the right to reject any measure within 30 days of the measure being installed. If any payments were made for the measure, the contractor must then provide a refund. During this 30 day period, it is up to the customer to evidence that the measure is faulty³⁸.

14.8. If the customer does not reject the goods, they will be entitled to a repair or replacement of the measure. If such a repair or replacement fails, the customer can still reject the goods for a refund or price reduction³⁹.

³⁶ See "General" on Page 10, Section 3 of the [TrustMark Code of Conduct](#)

³⁷ See "Products" on Page 11, Section 4 of the [TrustMark Code of Conduct](#)

³⁸ See "30-day right to reject" on Page 11, Section 4 of the [TrustMark Code of Conduct](#)

³⁹ See "30-day right to reject" on Page 11, Section 4 of the [TrustMark Code of Conduct](#)

14.9. If a problem is found after the first 30 days, the customer can claim a repair or replacement for the faulty measure, unless the contractor can prove otherwise. Between 30 days and 6 months, if a fault is identified, the contractor must provide evidence the fault is not a result of their installation as, at this point, the law assumes the fault to be present from install⁴⁰.

14.10. After 30 days, the customer can still ask for a full or partial refund where⁴¹:

- the repair or replacement is unsuccessful or impossible
- it could cause them significant inconvenience (e.g. take a long time)

14.11. After 6 months, it is up to the customer to evidence any defect was present at the time of delivery, and/or the item was not installed correctly⁴².

Complaints

14.12. If a consumer wishes to submit a complaint in regard to a project carried out by a TrustMark Registered Business, a walkthrough of the complaint process can be found on the [TrustMark website](#).

14.13. To request details about the project carried out within their property, a consumer can contact ECO.SAR@ofgem.gov.uk to raise a subject access request (SAR). Further information on raising an SAR be found on the [Ofgem website](#).

⁴⁰ See "The first 6 months" on Page 12, Section 4 of the [TrustMark Code of Conduct](#)

⁴¹ See "30-day right to reject" on Page 12, Section 4 of the [TrustMark Code of Conduct](#)

⁴² See "After 6 months" on Page 12, Section 4 of the [TrustMark Code of Conduct](#)

Appendix

Figure 1: Flowchart of GBIS and ECO4 Flex Process

