

## Great British Insulation Scheme (GBIS)

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# Great British Insulation Scheme Guidance: Delivery

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This guidance sets out Ofgem's procedures for administering the Great British Insulation Scheme, established by the Electricity and Gas (Energy Company Obligation) Order 2023 (the 'ECO4A Order'.

Since it was originally made, the ECO4A Order has been amended by the Electricity and Gas (Energy Company Obligation) (Amendment) Order 2025 and the Electricity and Gas (Energy Company Obligation) (Amendment, Saving and Transitional Provisions) Order 2025. All references to the ECO4A Order in this document are to the ECO4A Order as amended.

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.

Guidance on the Great British Insulation Scheme is provided in the following documents: Great British Insulation Scheme Guidance: Delivery, Great British Insulation Scheme Guidance: Supplier Administration, Great British Insulation Scheme and ECO4 Guidance for Local Authority Administration and ECO4 Guidance: New Measures and Products. 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 consumers 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 was outlined under the ECO4A Order.<sup>1</sup> This new scheme will run alongside ECO4 during this period and is called the Great British Insulation Scheme. ECO4 commenced on 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 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.

**This guidance applies to all measures installed under the Great British Insulation Scheme from 30 March 2023.**

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<sup>1</sup> Since it was originally made, the ECO4A Order has been amended by the Electricity and Gas (Energy Company Obligation) (Amendment) Order 2025 and the Electricity and Gas (Energy Company Obligation) (Amendment, Saving and Transitional Provisions) Order 2025. All references to the ECO4A Order in this document are to the ECO4A Order as amended.

Under the Scheme, energy suppliers must achieve a total of £55,998.000<sup>2</sup> 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.

### **GBIS measures must be completed before 1<sup>st</sup> April 2026.<sup>3</sup>**

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

- a) **Great British Insulation Scheme Guidance: Delivery** – 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 Guidance: Supplier Administration](#) and [Great British Insulation Scheme Supplier Data Dictionary](#) – Aimed 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](#) – 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](#) – 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

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<sup>2</sup> 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.

<sup>3</sup> Suppliers who choose to reassign ECO4 annual bill savings to GBIS must make a request to Ofgem by 31 July 2026.

- 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.

## **Disclaimer**

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. This document is for guidance only and is not a definitive guide to the ECO4A Order and it does not constitute legal advice.

Where there is any ambiguity or conflict between the guidance and the ECO4A Order, the ECO4A Order take precedence. 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, in this case the ECO4A Order. Any additional guidance we publish will be available on our website.

## **Relevant Legislation**

[The Electricity and Gas \(Energy Company Obligation\) Order 2023](#)

[The Electricity and Gas \(Energy Company Obligation\) \(Amendment\) Order 2025](#)

[The Electricity and Gas \(Energy Company Obligation\) \(Amendment, Saving and Transitional Provisions\) Order 2025](#)

## **Consultations**

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

[Department of Business, Energy & Industrial Strategy \(BEIS\) ECO+ consultation: Consultation Stage Impact Assessment](#)

[Ofgem's Administration consultation decision: Great British Insulation Scheme and ECO4 Amendment](#)

[Standard Assessment Procedure \(SAP\) and Reduced Data SAP \(RdSAP\) Amendments](#)

[Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes](#)

[Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes - government response](#)

[ECO4 and GBIS Mid-Scheme Changes Administration: consultation](#)

[ECO4 and GBIS Mid-scheme Changes Administration: decision](#)

# 1. Introduction

- 1.1. A new obligation period has been established under the ECO4A Order, and the Scheme that runs during this period is called 'The Great British Insulation Scheme' – often in this document abbreviated to 'the Scheme'.
- 1.2. The overall obligation period for the Scheme runs from 25 July 2023 to 31 March 2026 and is split into three phases. Ofgem will administer the Scheme in line with the requirements of the ECO4A Order.
- 1.3. The Great British Insulation Scheme broadens the eligibility pool from ECO4 by including two eligibility groups. The first group is the low-income eligibility 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.
- 1.4. 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:
  - **Phase A** – 25 July 2023, commencement date of parts 1 to 9 of the ECO4A Order – 31 March 2024: £7,280,000<sup>9</sup> (Great British Insulation Scheme measures have been permitted on a voluntary basis from 30 March to 24 July, known as the early delivery period).
  - **Phase B** - 1 April 2024 – 31 March 2025: £24,359,000
  - **Phase C** - 1 April 2025 – 31 March 2026: £24,359,000
- 1.5. 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. Suppliers can also achieve their obligation through reassigning annual bill savings from ECO4, see Chapter 9 of the [GBIS Guidance: Supplier Administration](#) for more information.
- 1.6. The Great British Insulation Scheme continues ECO4's focus on improving the least energy efficient homes.

## **Updates to this document**

- 1.7. This document has been updated to clarify the circumstances when we will seek to reject non-compliant measures, how to define rural areas in Scotland, and general formatting and drafting improvements.
- 1.8. For further details on the updates contained in this version and previous versions of this publication, see the Summary of Updates. You can find it as a subsidiary document at the bottom of the website page hosting this document.

## **The Great British Insulation Scheme Guidance**

- 1.9. 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.
- 1.10. 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, e.g., Publicly Available Specification (PAS), Heat Trust requirements, TrustMark, Building Regulations, etc.
  - d) Other specifications and guidance not directly specified in legislation.

## **Information gathering powers**

- 1.11. 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

- 1.12. Ofgem will process all personal data collected in accordance with the assimilated 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 (such as the Welsh and Scottish governments) in line with Ofgem's scheme administration functions and duties under the UK GDPR. For more information on how we process personal data and who we might share it with on the Great British Insulation Scheme please refer to our scheme [privacy notice](#).

## Queries and further information

- 1.13. For further information on our administration of the Great British Insulation Scheme, visit our [website](#).
- 1.14. Any queries about our guidance or the administration of the Scheme should be directed to [GBIS.enquiry@ofgem.gov.uk](mailto:GBIS.enquiry@ofgem.gov.uk).
- 1.15. For further advice regarding energy efficiency, see the [Simple Energy Advice website](#).
- 1.16. For further information on TrustMark can be found on their [website](#). Queries regarding the TrustMark Framework should be directed to [eco@trustmark.org.uk](mailto:eco@trustmark.org.uk)
- 1.17. 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 [ecoteam@energysecurity.gov.uk](mailto:ecoteam@energysecurity.gov.uk).
- 1.18. Customers can check if they are eligible for the scheme on the [Government webpage](#).



## 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:
  - a) **Phase A:** 25 July 2023 to 31 March 2024
  - b) **Phase B:** 1 April 2024 to 31 March 2025
  - c) **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. 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.
- 2.12. Suppliers may apply to reassign ECO4 ABS to their GBIS obligation. See Chapter 9 of the GBIS Supplier Administration guidance for further detail.

## **Early Delivery**

- 2.13. 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.
- 2.14. 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 eligibility 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 <sup>4</sup> 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

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<sup>4</sup> 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.

Eligibility	Tenure	Starting SAP Band	Measures	Other Requirements
LIG	PRS	D-G in England or Wales <sup>4</sup> 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 eligibility group rather than any being eligible through the general eligibility group
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 eligibility group rather than any being eligible through the general eligibility group
Great British Insulation Scheme Flex Routes 1 & 3	OO	D-G	All measures including secondary measures such as heating controls	Requirements are route specific. Please see relevant sections for more details

Eligibility	Tenure	Starting SAP Band	Measures	Other Requirements
Great British Insulation Scheme Flex 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 Routes 1 & 3	PRS	D-G in England or Wales <sup>4</sup> 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 Route 2	PRS	E-G in England or Wales <sup>4</sup> E in Scotland	All eligible insulation measures minus heating control measures	Requirements are route specific. Please see relevant sections for more details
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

Eligibility	Tenure	Starting SAP Band	Measures	Other Requirements
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 eligibility 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 eligibility 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 eligibility group



Great British Insulation Scheme Guidance: Delivery

Eligibility	Tenure	Starting SAP Band	Measures	Other Requirements
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 eligibility group

## **Eligibility Groups**

- 3.2. The Great British Insulation Scheme targets two eligibility groups. A low-income eligibility 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.<sup>5</sup>

### **Low-Income Eligibility Group and Social Housing**

- 3.4. The Scheme also targets a low-income eligibility group which mirrors the eligibility criteria for the Help to Heat Group (HTHG) within ECO4. Further information on eligibility can be found from paragraph 3.130 onwards.
- 3.5. Both the general eligibility and low-income eligibility groups are then further divided into whether they are owner-occupied or privately rented, with the low-income eligibility 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 (including F and G if exempt from MEES). Route 4 which

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<sup>5</sup> Further information on evidencing can be found in Appendix 2 – Premises and occupant requirements.

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.

## **Low-Income Minimum Requirement**

- 3.9. There is a requirement that at least 20% of each annual target should be delivered to the low-income eligibility 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.
- 3.10. 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% (i.e., 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**

- 3.11. 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.
- 3.12. Scheme measures delivered to premises occupied by a member of the low-income eligibility 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.<sup>6</sup>
- 3.13. 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.

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<sup>6</sup> For more information on the definition of a social landlord, see Schedule 2 of the ECO4 Order.

- 3.14. 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.
- 3.15. The following section outlines the definitions and requirements for each of the aspects of private domestic premises.

## **The 'Private' Requirement**

- 3.16. [The Great British Insulation Scheme Supplier Data Dictionary](#) 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,<sup>7</sup>
  - b) Who the premises belong to, or are let by, and
  - c) Where applicable, the financial rate at which the premises are let (i.e., rent).
- 3.17. 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.
- 3.18. 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.
- 3.19. 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

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<sup>7</sup> 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.

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.<sup>8</sup>

3.20. Properties that have a Lifetime Mortgage through an Equity Release scheme are treated in the same way as a standard mortgage.<sup>9</sup> 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.

3.21. 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.

3.22. A property occupied by the way of liferent meets the definition of 'owner-occupied premises' in the ECO4 Order.<sup>10</sup> 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.

3.23. Evidence demonstrating who the premises belong to, or are let by, must relate to the person to whom the relevant interest belongs.

3.24.

3.25.

3.26.

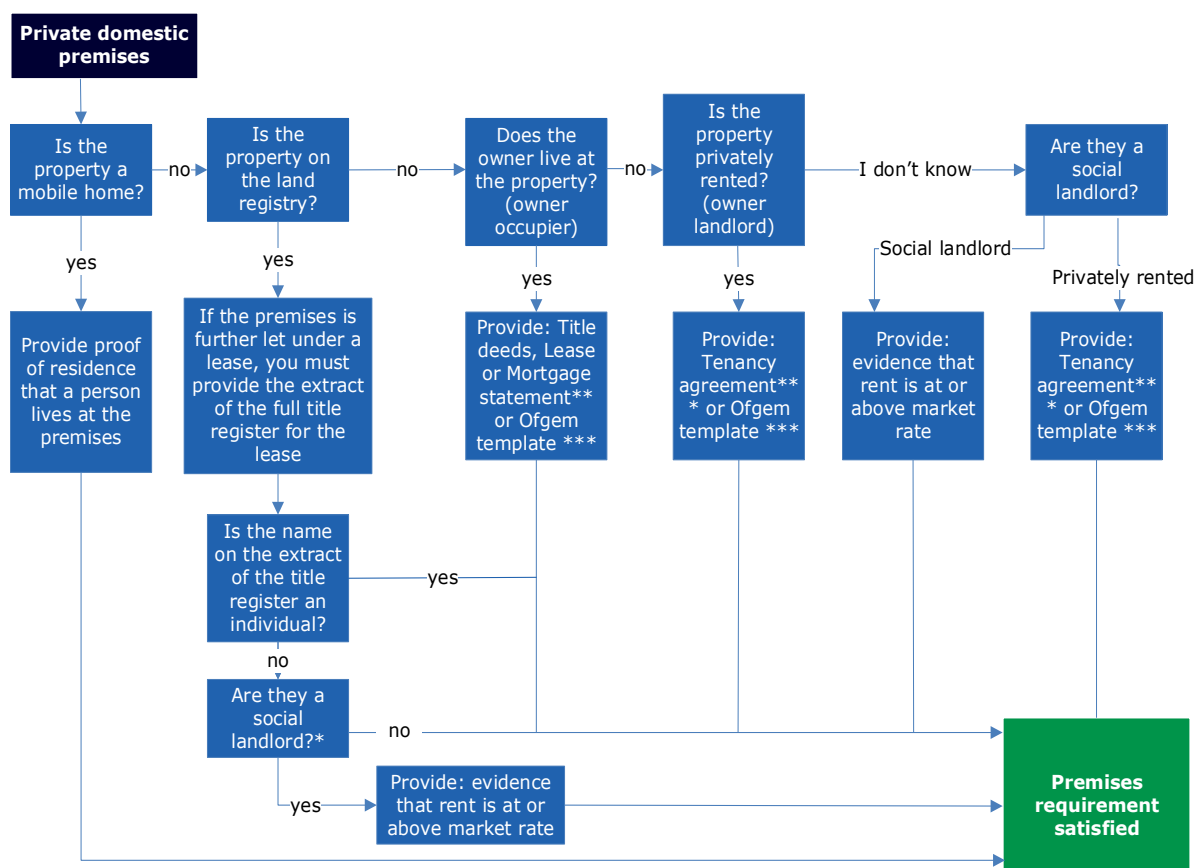
3.27. Figure 1 shows how to identify private domestic premises, and some of the documents needed to prove the premises requirement. The Ofgem template can be found on the [ECO4 & GBIS Eligibility and Pre-Installation Form](#).

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<sup>8</sup> See Appendix 2 – Premises and occupant requirements for information on the documentation needed in these circumstances.

<sup>9</sup> 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.

<sup>10</sup> 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

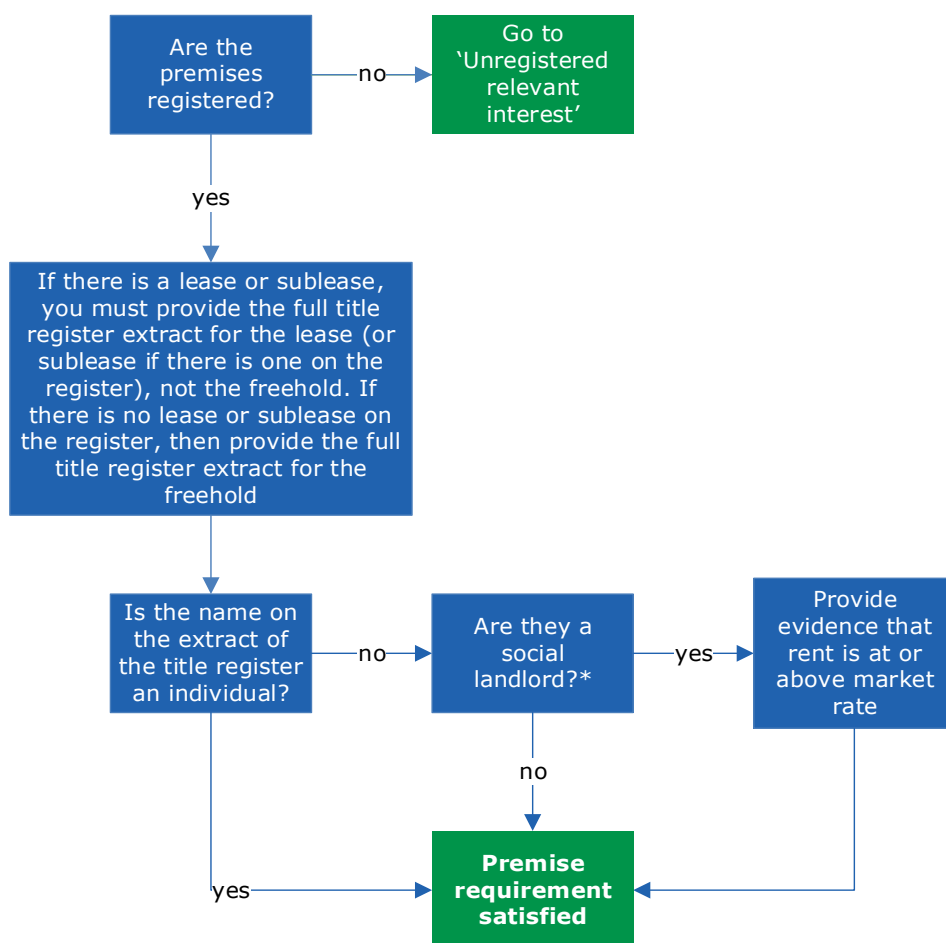
\*\*\* Must be accompanied by proof of residence dated within 12 months before the completion of the first measure in the retrofit

## **Registered Relevant Interest**

- 3.28. 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.<sup>11</sup>
- 3.29. 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. Figure 2 shows how to meet the premises requirement for registered premises.

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<sup>11</sup> See Appendix 2 – Premises and occupant requirements for information on calculating the market rate.

**Figure 2: Registered Premises Flowchart**

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

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

## Unregistered Relevant Interest

- 3.31. Premises for which a relevant interest is not registered will be considered private domestic premises if:
- 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.
  - The premises are let under a lease granted under the 'Right to Buy' or 'Right to Acquire' schemes in England or Wales.

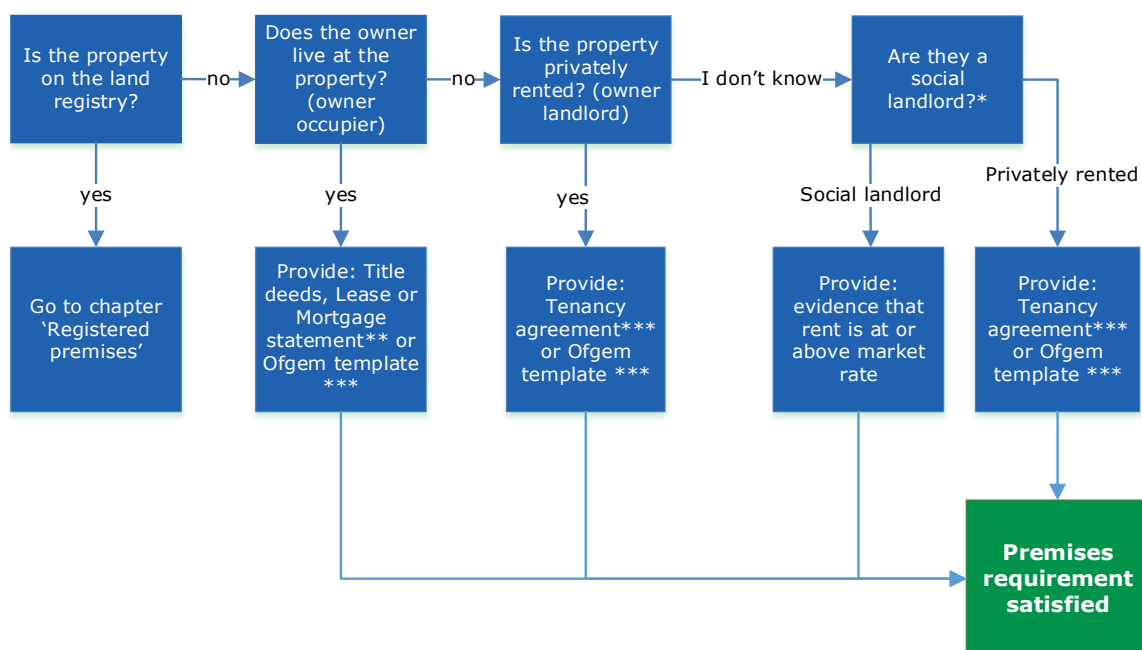


- c) The premises are let under a lease granted under the 'Right to Purchase' scheme in Scotland.

3.32. The premises is a croft (see paragraphs 3.38 - 3.39 below for more information).

3.33. Figure 3 shows how to meet the premises requirement for unregistered premises. The Ofgem template can be found on the [ECO4 & GBIS Eligibility and Pre-Installation Form](#).

**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

3.34. 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)

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

- 3.36. EST will provide the following categories against these verifications:
- a) Matched
  - b) Unmatched
  - c) Unavailable
- 3.37. 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**

- 3.38. 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 eligibility or general eligibility 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.
- 3.39. 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**

- 3.40. 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.
- 3.41. As the Scheme relies on Standard Assessment Procedure / Reduced Data Standard Assessment Procedure (SAP/RdSAP) 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 (i.e., is occupied as a home)<sup>12</sup>.

## Dwellings

- 3.42. Any domestic premises receiving Great British Insulation Scheme measures must meet the 'dwelling' definition in [The Energy Performance of Buildings \(England and Wales\) Regulations 2012](#) and [The Energy Performance of Buildings \(Scotland\) Regulations 2008](#).
- 3.43. 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".
- 3.44. Regulation 2 of the [Building \(Scotland\) Regulations 2004](#) defines 'dwelling' 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".
- 3.45. 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.
- 3.46. 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.
- 3.47. 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.

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<sup>12</sup> As per Article 2 of the [ECO4 Order 2022](#), a private domestic premise refers to domestic premises other than social housing.

- 3.48. 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.
- 3.49. 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 domestic premises” under this provision. If an extension is being added, see paragraph 3.62.
- 3.50. Suppliers should contact us if there is any uncertainty over whether premises would qualify as new domestic premises.

### **Confirming that premises are not new build premises**

- 3.51. Where a building is pre-existing before 1 April 2022 the ECO4 & GBIS Eligibility and Pre-Installation Form 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.
- 3.52. Where the ECO4 & GBIS Eligibility and Pre-Installation Form is not completed and signed to identify that the premises are pre-existing, evidence of occupancy (see paragraph 3.60) or other evidence that the building is pre-existing must be available.
- 3.53. 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:
  - a) Documentation that meets the occupancy requirements (listed in paragraph 3.60)
  - 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.
- 3.54. Where none of these documents are available, suppliers should contact us to discuss alternative documentation.

- 3.55. We may carry out an audit to confirm that the ECO4 & GBIS Eligibility and Pre-Installation Form has been completed as required. Where the form 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 domestic premises**

- 3.56. Where a measure is delivered to new build premises, such as buildings subject to a change of use (see section on Dwellings from paragraph 3.42) it needs to be evidenced that the premises were first occupied as domestic premises before the installation was completed.
- 3.57. For a measure delivered to the premises of a member of the low-income eligibility group evidence to demonstrate that a member of the low-income eligibility group resides in the premises will be sufficient to evidence eligibility as this demonstrates that the premises is occupied.
- 3.58. All social housing, Great British Insulation Scheme Flex and in-fill measures delivered to new domestic premises require a declaration on the ECO4 & GBIS Eligibility and Pre-Installation Form to be completed and signed by the occupant.
- 3.59. Where premises were erected after 1 April 2022, a declaration from a landlord or non-resident owner must be signed on ECO4 & GBIS Eligibility and Pre-Installation Form 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.
- 3.60. 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
  - e) NHS letter, or
  - f) Extract from the electoral register.
- 3.61. 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**

- 3.62. A new build extension is an extension completed on or after 1 April 2023.
- 3.63. A Great British Insulation Scheme measure may not be delivered to a new build extension until the works for the extension have been completed.
- 3.64. 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.
- 3.65. 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.
- 3.66. Where neither of these documents are available, suppliers should contact us to discuss alternative documentation.
- 3.67. This evidence must be made available on request. Where no documentation is available, the measure may be ineligible.

## **The 'Domestic' Requirement**

### **Occupancy**

- 3.68. 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.
- 3.69. 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, i.e., 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.
- 3.70. 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

- 3.71. 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.
- 3.72. 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.
- 3.73. 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.
- 3.74. 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

- 3.75. 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.
- 3.76. 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.

- 3.77. As defined in the [Housing Act 2004](#)<sup>13</sup>, 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.
- 3.78. Proof of rent (or another form of consideration) of at least one resident in the HMO must be retained.
- 3.79. Occupancy requirements for HMOs are the same as for other types of domestic premises (see paragraph 3.60).

## Rural and Off-Gas Premises

- 3.80. GBIS measures can 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%.
- 3.81. Prior to the 29 July 2025, a 'rural area' means an area classified as rural in the [2011 Rural Urban Classification of Output Areas](#) for properties in Wales, and in the [Scottish Government Urban Rural Classification 2016](#) for properties in Scotland.
- 3.82. After 1 August 2025, a 'rural area' means an area classified as rural in the [2021 Rural Urban Classification](#) document for properties in Wales, and in the [Scottish Government Urban Rural Classification 2022](#) for properties in Scotland.

## Declaring Off-Gas Premises

- 3.83. Off-gas premises are those premises not connected to a pipeline system operated by a gas transporter on 31 March 2022. We will require the Retrofit Coordinator to fill out the ECO4 & GBIS Eligibility and Pre-Installation Form and declare whether or not a connection to gas pipeline was present before 31 March 2022.
- 3.84. Off-gas premises are considered premises:
  - a) Where the primary heating system is a fixed coal, oil, or LPG heating system;

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<sup>13</sup> For further information on HMOs, see section 254 of the [Housing Act 2004](#).



- 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).

3.85. The Retrofit Coordinator collects off-gas information through an RdSAP assessment and lodges it in the TrustMark's Data Warehouse in the field 'MainsGas'. Evidence should be retained to prove the premises was not connected to any pipeline system operated by a gas transporter.

## How to Determine Rural Premises

- 3.86. It is a requirement that only the data sets in scheme legislation are used to determine whether a property is rural.<sup>14</sup> Suppliers may use the [ONS Postcode Directory](#) or [ONS Postcode Directory look-up tool](#) to ensure measures are installed in eligible rural areas. Within the look up tool, suppliers can look up a postcode and find the value in the pop-up window under the heading 'RUC21IND'. Alternatively, suppliers may download the correct data set(s), find the relevant postcode and read off the corresponding value in the 'RUC21IND' column.
- 3.87. After 29 July 2025, (the date the Electricity and Gas (Energy Company Obligation) (Amendment) Order 2025 became law), areas in Wales with Rural Urban Indicator codes RLN1, RSN1, RSF1, RLF1 are considered rural.<sup>15</sup>
- 3.88. The Scottish Government's Urban Rural Classification is available in multiple forms. It is important to be aware that ONS use the 6-fold form for the 2022 Classification (this is included within 'RUC21IND' in the ONS Postcode Directory).<sup>16</sup> When using the 6-fold form classes 5 and 6 indicate rural areas.
- 3.89. [The Scottish Statistics Postcode Lookup 2025/2](#) contains the 2022 Urban Rural Classification in both 6-fold and 8-fold forms in the columns labelled

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<sup>14</sup> From 29 July 2025, the coming into force date of the amendment legislation, a rural area in England and Wales is an area classified as rural in the "2021 rural-urban classification output areas" published by the Office for National Statistics in March 2025; and in Scotland an area classified as rural in the "Scottish Government Urban Renewal Classification 2022" published by the Scottish Government in December 2024.

<sup>15</sup> Prior to 29 July 2025 areas in Wales with Rural Urban Indicator codes D1, D2, E1, E2, F1 and F2 were considered rural, using the 2011 rural urban classification of output areas published by ONS in August 2013. These are available in the ONS Postcode Directory in the column labelled 'RUC11IND'.

<sup>16</sup> Prior to 29 July 2025 rural areas in Scotland were identified using the [Scottish Government Urban Rural Classification 2016 published by the Scottish Government in March 2018](#). To note for clarity, these are not available in the ONS Postcode Directory in the column labelled 'RUC11IND'.

'UrbanRural8Fold2022Code' and 'UrbanRural6Fold2022Code'. If using the 8-fold form, classes 6, 7 and 8 are considered rural. This is based on the classifications in the [Scottish Government Urban Rural Classification 2022](#).

## Private Rented Sector

- 3.90. 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<sup>17</sup>. 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 one exception may apply.
- 3.91. The exception 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) is if the property is registered on the PRS Exemptions Register<sup>18</sup> in accordance with [regulation 36\(2\) of the Energy Efficiency \(Private Rented Property\) \(England and Wales\) Regulations 2015](#).
- 3.92. Whether a property is on the PRS Exemptions Register can be determined and evidenced by checking the [PRS Exemptions Register](#).

## PRS General Eligibility Group

- 3.93. 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

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<sup>17</sup> For more information on the Minimum Level of Energy Efficiency (MEES) standards, see the [Guidance for Landlords](#).

<sup>18</sup> See [Guidance on PRS Exemptions and Exemptions Register Evidence Requirements](#) for more information.

- room in roof insulation

## **PRS Low-Income Eligibility Group**

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

## **Evidence Needed for PRS Properties**

- 3.95. To evidence whether properties are PRS, we will require suppliers to obtain a declaration from the customer confirming the tenure. This should be included in the ECO4 & GBIS Eligibility and Pre-Installation Form. Suppliers may also use the ECO4 and the Great British Insulation Scheme - Templates to Evidence Private Domestic Premises and Social Housing.<sup>19</sup> These templates are to be 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.
- 3.96. This can be evidenced in the 'Declarations and sign off' section in the [ECO4 & GBIS Eligibility and Pre-Installation Form](#).
- 3.97. 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.
- 3.98. To evidence that a Band F or G PRS property is eligible for a Great British Insulation Scheme measure a screenshot must be provided of the [PRS Exemptions Register](#).

## **Social Housing**

- 3.99. 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 eligibility group rather than any being eligible through the general eligibility 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.

3.100. 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
- e) Under floor insulation
- f) Solid floor insulation
- g) Park home insulation
- h) Room in roof insulation
- i) Innovation measures (IMs)

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

## **Determining Whether Properties are Social Housing**

3.102. 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.

3.103. 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.

- 3.104. Where premises are not registered, it can be considered as social housing where there is proof that a social landlord lets the property<sup>20</sup>.
- 3.105. Information on how to identify social landlords can be found in Appendix 2 – Premises and occupant requirements.
- 3.106. The supplier must collect a declaration in the ECO4 & GBIS Eligibility and Pre-Installation 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.

### **Determining Whether the Premises are Let Below Market Rate**

- 3.107. 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 [ECO4 & GBIS Eligibility and Pre-Installation Form](#). This declaration form must be retained by suppliers and be available on request for audit purposes.
- 3.108. 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.
- 3.109. For more information on how market rate is determined for different areas see Appendix 2 – Premises and occupant requirements.

### **In-Fill**

- 3.110. In-fill is a mechanism which enables homes which would not normally be eligible for ECO to receive certain measures under the scheme, where eligible homes in the same building or street are also receiving the same measure. It is intended to make it easier to install measures such as external wall insulation, which may only be viable if all homes in a given location are treated at the same time.

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<sup>20</sup> 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](#).

- 3.111. Under the Great British Insulation Scheme, there are two different categories for in-fill depending on whether the properties are flats or houses.
- 3.112. The ECO4A Order defines a “flat” 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.
- 3.113. The ECO4A Order considers a house “a domestic premises that is not a flat”, where “flat” has the same meaning as set out above.
- 3.114. 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 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.
- 3.115. 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.
- 3.116. When notifying an in-fill measure the primary measure/s must be identified in that notification.
- 3.117. 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 Guidance](#) for further information on inter- and intra-supplier transfers.

- 3.118. If a measure at an ECO-eligible property is not approved or is 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**

- 3.119. 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 this, 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.
- 3.120. Eligible measures for flats treated as in-fill include:
- a) Solid wall insulation
  - b) Cavity wall insulation
- 3.121. The in-fill measure has to be linked to the same kind of measure in the associated Great British Insulation Scheme property, i.e., 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.
- 3.122. 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.
- 3.123. 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.

**Figure 4: In-fill flats**

## In-Fill Houses

- 3.124. 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.
- 3.125. 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.
- 3.126. The eligible measures for in-fill houses are limited to solid wall insulation.
- 3.127. The in-fill measure must be linked to a solid wall insulation measure in the associated Great British Insulation Scheme treated property, i.e., it needs to be linked to **three** solid wall insulation measures, each in a different Great British Insulation Scheme treated property.
- 3.128. 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.
- 3.129. 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.

- 3.130. Figure 5: In-fill houses illustrates 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.

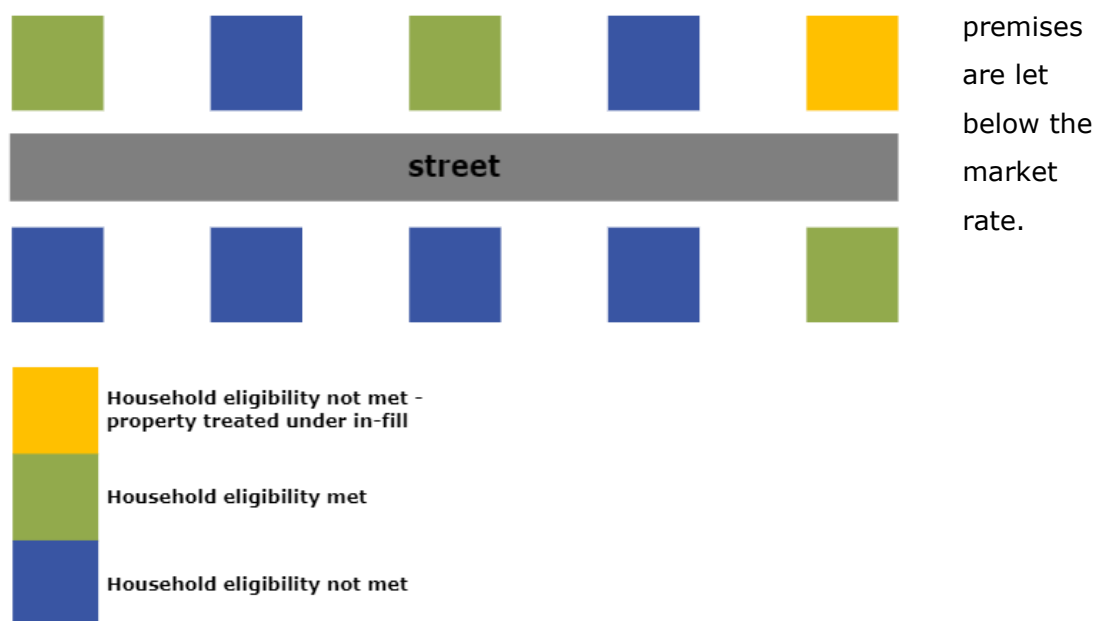
**Figure 5: In-fill houses**

## The Occupant Requirement

- 3.131. 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 eligibility group, or
- b) a household declared by a local authority<sup>21</sup> as meeting one of the three Great British Insulation Scheme Flex referral routes.

- 3.132. The eligibility requirements do not apply to properties within the general eligibility 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



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<sup>21</sup> See [Article 2 of the ECO4 Order](#) for the definition of a local authority.

## **Great British Insulation Scheme-Eligible Benefits**

- 3.133. 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 eligibility group. A supplier can promote a measure to occupants of private domestic premises if they are in the low-income eligibility group or live with someone in the low-income eligibility group in the same premises. Low-income eligibility group is based on a tenant's status rather than the landlord's, where the property is rented above the market rate.

## **Evidencing eligibility**

- 3.134. There are several things to consider when collecting evidence for low-income eligibility group eligibility. Suppliers must ensure:
- a) The measure is being installed at private domestic premises where a low-income eligibility 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 eligibility group at any time within a 12-month period ending with the day on which the measure is completed.
- 3.135. All documents showing low-income eligibility 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 eligibility group in the case of audit.
- 3.136. All documentation providing evidence of low-income eligibility group 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.
- 3.137. 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 eligibility group, and
- b) That the person is an occupant of the premises.

3.138. A person living at private domestic premises is an eligible member of the low-income eligibility 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 GBIS Low-Income Eligibility Group**

<b>Eligible Benefits under GBIS Low-Income Eligibility Group</b>
Income based Jobseekers Allowance (JSA)
Income related Employment and Support Allowance (ESA)
Income Support (IS)
Pension Credit Guarantee Credit (PCGC)
Working Tax Credit (WTC)
Child Tax Credit (CTC)
Universal Credit (UC)
Housing Benefit
Pension Credit Savings Credit (PCSC)
Child Benefit (subject to income caps and composition)

3.139. Households with disabilities would only be an eligible member of the low-income eligibility 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.

3.140. 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.

3.141. WTC and CTC ended on 5 April 2025. When evidencing an individual's HTHG eligibility on or before this date, we will accept receipt of WTC or CTC. When evidencing HTHG eligibility after this date, receipt of UC should be relied upon instead.

## **Evidencing Low-Income Eligibility Group Eligibility**

3.142. We do not require full 'proof of benefit' letters. To evidence low-income eligibility group, 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

## **Matched WHD Core Group Notice**

3.143. Matched WHD Core Group notices are no longer permissible evidence of a consumer's HTHG membership. Similarly, an energy bill showing that the WHD rebate has been applied is not acceptable evidence.

## **DWP Data Matching**

3.144. There are two processes for cross checking a person's benefit status to confirm low-income eligibility group status: Energy Saving Trust (EST) data matching and ECO Eligible Referral (EER) data matching. Both routes work with DWP to check whether individuals are in receipt of specific benefits.

3.145. The EST route involves a third-party intermediary body and can be utilised by all supply chain organisations, whereas the EER route is direct with DWP and can only be utilised by suppliers. Both processes rely on different reference numbers as described below.

3.146. If DWP confirms, through either route, that a person is in receipt of a low-income eligible benefit, this can be relied upon for GBIS eligibility.

## EST Data Matching

- 3.147. 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 eligibility group.
- 3.148. If a supplier wishes to rely on a DWP confirmation, it must include the 7-digit reference number (or 10 digits where it includes the user prefix) provided by EST when notifying the measure. This is the 'DWP reference number' in the measure notification template. This reference number will also be accepted where it is preceded by the three digits identifying the service user.
- 3.149. 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 eligibility group benefit.
  - b) **Unmatched** – a person who is confirmed by DWP as not receiving a low-income eligibility 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 (i.e., hidden spacing or a spelling mistake).
- 3.150. We will conduct these checks during monthly processing rounds. 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.
- 3.151. 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.
- 3.152. In these cases, we will require alternative evidence to demonstrate that a person was in receipt of a low-income eligibility group benefit and was residing at the address at the time of installation.
- 3.153. An 'unmatched' or 'unverified' referral does not confirm that a person is in receipt of a HTHG benefit, therefore it will not be sufficient to satisfy us that a person is a member of the low-income eligibility group. In this case, the supplier should not

include the DWP reference number when notifying a measure. The supplier should satisfy us that the relevant person is a member of the low-income eligibility 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.

- 3.154. Where suppliers initially notify unmatched or unverified measure on the scheme register, these 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 eligibility group.
- 3.155. 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)**

- 3.156. Under GBIS, 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 low-income eligibility group benefits through a direct check with DWP.
- 3.157. 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 section Evidencing eligibility for more information.
- 3.158. 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 eligibility group Verification Method as 'ECO Eligible Referral' on their notification template.

### **Income Levels Under Child Benefit**

- 3.159. To qualify as a member of the low-income eligibility group, a person who claims Child Benefit must have a gross annual income at or below the relevant threshold in Table 3. The threshold differs depending on whether the person making the claim is a single claimant or a member of a couple.

The thresholds apply to the gross annual income of the single claimant or couple from all sources.

**Table 3: Income Levels Under Child Benefit**

	<b>1 child or qualifying young person</b>	<b>2 children or qualifying young person/s</b>	<b>3 children or qualifying young person/s</b>	<b>4 + children or qualifying young person/s</b>
<b>Single Claimant</b>	£19,900	£24,800	£29,600	£34,500
<b>Member of a couple</b>	£27,500	£32,300	£37,200	£42,000

3.160. "Child" refers to a person under the age of 16. "Qualifying young persons" refers to a person under the age of 20 in approved education or training.

3.161. A "couple" refers to:

- Two people who are married or in a civil partnership, and are members of the same household; or
- Two people who are not married or in a civil partnership, but are living together as a couple.

3.162. "Single claimant" refers to a person who is not a member of a couple.

3.163. Where a claimant is also in receipt of one of the other low-income eligibility group qualifying benefits listed in Table 2, we recommend this route should be pursued instead of Child Benefit. Verifying eligibility through the Child Benefit route should only be used when other routes of establishing eligibility are not available.

3.164. To verify low-income eligibility group membership using Child Benefit, the following must be evidenced:

- That the person claims Child Benefit
- The number of children or qualifying young persons in the household
- Couple status
- The claimant's gross annual income if single or couple's gross annual income if part of a couple

3.165. To evidence the receipt of Child Benefit and the number of children within a household, suitable evidence includes:

- Child benefit letters
- Confirmation documents downloaded from the [Government Gateway](#)

3.166. To evidence status as a single parent, suitable evidence includes:

- Council tax letters with a single occupancy discount
- Tax Credit Award Notices showing payment as a single person

3.167. To evidence status as a member of a couple, suitable evidence includes:

- Marriage / civil partnership certificate
- A tenancy agreement
- A combination of the following which demonstrate matching addresses for the recipients:
  - Utility bills
  - Benefit letters
  - Financial statements
  - HMRC letters
  - DWP letters
  - GP or Dental registration letters

3.168. To evidence the claimant's gross annual income, we make the following interpretations: Gross annual income is all money that a household regularly<sup>22</sup> earns and receives before taxes and other deductions, where applicable. 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)

3.169. 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)
- Pension lump sum payments
- Student loans or grants
- Transfer of money between 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)

3.170. Suitable evidence types for gross annual income include:

- Tax returns, including self-assessment tax returns
- 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

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

3.172. 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. 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.

- 3.173. If no evidence is available from this period, we recommend using the most recent evidence available from before this time period.
- 3.174. A self-declaration given by a member of the household cannot be relied upon as standalone evidence of gross annual income.

## **GBIS Flex**

- 3.175. The Flexible Eligibility (Flex) component of GBIS allows Local Authorities (LAs) to identify and refer consumers that live in private tenure homes and are considered low-income, fuel poor, or vulnerable to the effects of living in a cold home. Participation in Flex is optional for both suppliers and LAs.
- 3.176. Measures delivered through Flex must be delivered to private tenure homes (i.e. owner-occupied or private rented sector households). Domestic premises owned or let by a social landlord are not eligible for Flex<sup>23</sup>.
- 3.177. All LAs in England, Wales or Scotland are able to make referrals through Flex. Devolved Administrations (the Welsh and Scottish Governments) are also able to refer households to suppliers.

## **Statement of Intent (SoI)**

- 3.178. LAs notify the public of their participation in Flex by publishing a Statement of Intent (SoI) on their website. This will indicate which schemes (ECO4 and/or GBIS) an LA participates in, and the eligibility routes and proxies they use.
- 3.179. An LA must publish an SoI before they can make declarations to suppliers.
- 3.180. An LA can delegate authority to another LA to provide declarations for consumers in its area. This will be stated in the SoI of the LA to whom authority has been delegated.

## **Eligibility**

- 3.181. 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 for Flex<sup>24</sup>.

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<sup>23</sup> For the definition of a social landlord, see [Paragraph 3, Schedule 2 of the ECO4 Order](#).

<sup>24</sup> For the definition of a social landlord, see [Paragraph 3, Schedule 2 of the ECO4 Order](#).

3.182. Similar to the standard HTHG eligibility criteria for GBIS, Flex eligibility consists of two elements:

- **Property eligibility:** This refers to whether a property meets the route-and tenure-specific SAP band eligibility criteria.
- **Household eligibility:** This refers to whether a household meets the eligibility criteria of one of three Flex routes:
  - Route 1: Household Income
  - Route 2: Proxy Targeting
  - Route 3: Medical Referrals

3.183. An LA can use any of these routes to refer eligible consumers. Each route must be used independently. Where an LA refers a member of a household, an LA officer will collect evidence to demonstrate eligibility.

3.184. Though LAs are expected to retain this evidence, suppliers are responsible for ensuring that they have access to this evidence, and that they collect and retain any declarations. We may request this evidence from suppliers where issues arise with projects or measures, for example, due to a mismatch or during audits.

3.185. We expect evidence of eligibility to be retained for up to 3 years following the end of the scheme, as per the wider data retention policies for ECO4 and the Great British Insulation Scheme<sup>25</sup>.

3.186. Where suppliers are not able to provide sufficient evidence when requested, we may reject the measure(s) in a retrofit project.

## Route 1: Household Income

3.187. 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.

3.188. 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.

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<sup>25</sup> Further information can be found in the [ECO4](#) and [GBIS](#) Privacy Notices.

3.189. For further information on how to evidence household income, see 3.156 to 3.165.

## Route 2: Proxy Targeting

3.190. Households that meet at least two of the proxies listed below are eligible via Flex Route 2.

- **Proxy 1:** Refers to consumers living in a Lower Layer Super Output Area (LSOA) within Indices of Multiple Deprivation.
- **Proxy 2:** Refers to consumers that are entitled to a Council Tax reduction on the grounds of low-income.
- **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](#). This must be for a reason other than their low-income.
- **Proxy 4:** Refers to a household with a child that is eligible for free school meals on the grounds of low income<sup>26</sup>.
- **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](#).
- **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](#).
- **Proxy 7:** Refers to consumers identified through energy supplier debt data.

3.191. The following proxy combinations cannot be used:

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

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<sup>26</sup> 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](#).

3.192. For more information on evidencing for each of these routes, see Section 6 of the GBIS and ECO4 Local Authority Administration Guidance.

## Supplier Flex

3.193. Suppliers can refer customers, independent of LAs, based on their own debt data via Route 2, Proxy 7. Suppliers will also need to evidence that the customer's household meets one of Route 2, Proxy 1 to 4. Proxies 5 and 6 cannot be used.

3.194. An example of evidence collection via Supplier Flex is given in Figure 5 below.

**Table 4: Example of evidence collection via Supplier Flex**

Actor	Supplier Flex Eligibility	Evidence
Supplier	A pre-payment meter household has been self-disconnected from its provider for six weeks.  This household also receives Council Tax reductions based on low-income.	Supplier notifies the referral via their Measure Notification.

## Route 3: Medical Referrals

3.195. 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.

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

- A cardiovascular condition
- A respiratory disease
- Limited mobility
- Immunosuppression

3.197. For more information on evidencing for this route, see Section 7 of the GBIS and ECO4 Local Authority Administration Guidance.

## SAP Band Eligibility

3.198. The route-and tenure-specific SAP band eligibility criteria for GBIS Flex are listed within Table 4 below.

**Table 5: Overview of Eligible SAP bands and Tenure Types for GBIS Flex**

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

## Declarations

- 3.199. LAs 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).
- 3.200. A declaration confirms that a consumer, or multiple consumers, are considered eligible under one of the four referral routes, and that evidence has been collected to demonstrate this.
- 3.201. There is no requirement for an LA to reassess a consumer's eligibility once a declaration has been issued, so long as the project starts within one year of the project being completed, and this was done so under a valid SoI.
- 3.202. 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).
- 3.203. The declaration must be issued within the 12-month period preceding the day on which the measure is complete. [https://www.ofgem.gov.uk/sites/default/files/2023-07/Great British Insulation Scheme and ECO4 Flex LA declaration to supplier template V1.0.docx](https://www.ofgem.gov.uk/sites/default/files/2023-07/Great%20British%20Insulation%20Scheme%20and%20ECO4%20Flex%20LA%20declaration%20to%20supplier%20template%20V1.0.docx)

- 3.204. Multiple consumers can be referred on a single declaration, provided each individual referral has its own Unique Reference Number (URN).

## **Declaration Notifications**

- 3.205. The LA will send a declaration notification to us to notify us that the declaration has been shared with the supplier.
- 3.206. We recommend that LAs submit declaration notifications to us before the installation of measures is complete, though they do not need to be processed by us by that date.

## **Supplier Notifications**

- 3.207. Referrals via Flex can be notified using the GBIS Measure Notification Templates.
- 3.208. The following Measure Notification fields outline the Flex eligibility type and route that is relevant for the household:
- Eligibility Type
    - “LI - LA Declaration” indicates referral via an LA or DA
    - “LI - Supplier Evidence” indicates referral via Supplier Flex (see 3.208)
  - Verification Method
    - “PPM” / “Non-PPM” indicates the type of debt data used for Supplier Flex
  - GBIS Flex Referral Route
  - LA Declaration Reference Number
  - Date of Householder Eligibility

## **Mismatches**

- 3.209. If data submitted to us within Supplier Measure Notifications and LA Declaration Notifications do not match, we will notify the supplier of the error to enable correction.
- 3.210. If the mismatch is not remediated, we will be minded to reject the measure(s).

3.211. Below, Table 6 presents some examples of example causes of mismatches and the remediation steps.

**Table 6: Examples of Declaration mismatches and remediation steps**

Error	Remediation steps
Supplier notifies a measure under Flex, but the measure notification details do not match the Declaration Notification URN or address.	A solution may be that the LA notifies the supplier that the declaration notification has not been submitted. The measure 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.
Measure uses the same URN as a previous measure.	Supplier would need to reassess their Measure Notification to ensure that each measure has been installed with a separate URN.



## 4. Retrofits

- 4.1. PAS 2035:2023 covers the whole life cycle of a retrofit measure, 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 2035:2023 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 2030:2023 standard.
- 4.4. PAS 2030:2023 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 2035:2023 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 plan<sup>27</sup>
  - installation of measures, commissioning, and handover.

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<sup>27</sup> 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 measure 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 2035:2023. They are also responsible for overseeing the measure from inception to completion, i.e., 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 that 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 is evidenced through the TrustMark Quality Assurance Framework. The measure covered by PAS should be installed by or under the responsibility of a TrustMark registered installer and have a relevant certificate of lodgement. In circumstances where non-compliance with any of the TrustMark requirements is detected, measures may be rejected.
- 4.10. Where suppliers have a retrofit consisting only of IMs that are not installed in accordance with PAS 2030:2023, 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.
- 4.11. 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.

## **RdSAP 10 update**

- 4.12. A new version of RdSAP, RdSAP 10, was introduced on 15 June 2025 and replaced RdSAP 2012. The ECO4A Order has been amended to account for this and as a result different versions of RdSAP must be used to perform RdSAP assessments for GBIS measures depending on the timing of the assessment.
- 4.13. Before 15 June 2025, RdSAP 2012 must be used to perform all GBIS retrofit RdSAP assessments.

- 4.14. From 15 June 2025 to 29 January 2026, either RdSAP 2012 or RdSAP 10 may be used to perform pre-retrofit RdSAP assessments.
- 4.15. New pre-retrofit RdSAP assessments completed on or after 29 January 2026 must use RdSAP 10.
- 4.16. Post-retrofit RdSAP assessments must always use the same RdSAP version as the pre-retrofit assessment. If the pre-retrofit assessment was performed using RdSAP 2012, then the post-retrofit assessment should also be performed using RdSAP 2012 regardless of when this post-retrofit assessment is completed. This also applies where a pre-retrofit RdSAP assessment was performed using RdSAP 2012 and the post-retrofit assessment has to be performed again for compliance reasons.
- 4.17. Where the pre-retrofit assessment must be re-determined for compliance reasons, the above rules do apply. However, if a pre-retrofit assessment completed using RdSAP 2012 must be re-determined on or after 29 January 2026 it must be re-determined using RdSAP 10 (and any post-retrofit assessment would have to be performed using RdSAP 10 to match).

## **Rejected and Non-Compliant Measures**

- 4.18. 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.
- 4.19. If we have reason to believe a measure is ineligible or non-compliant with 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.
- 4.20. Where measures lodged with TrustMark are found to be non-compliant with TrustMark standards, we expect suppliers to engage with the supply chain to encourage remediation. All measures successfully lodged with TrustMark will be awarded a TrustMark certificate of lodgement. We will refer measures to our rejections process where the TrustMark certificate of lodgement has been voided.

- 4.21. Where a supplier submits representations for a measure facing rejection because the certificate of lodgement has been voided, these will be sent to TrustMark for their feedback, and they will determine if the certificate is to be re-instated. We will then make a decision whether to reject. If the representations include a claim that the certificate of lodgement has been voided in error, we expect a detailed explanation of how the non-compliance was resolved prior to the minded to notice.
- 4.22. A post-retrofit RdSAP assessment should always be performed using the same RdSAP version as the pre-retrofit RdSAP assessment, even where the post-retrofit assessment is re-determined for compliance reasons. Depending on the timing, a pre-retrofit assessment performed using RdSAP 2012 may need to be updated to RdSAP 10. See 4.12-4.17 for more details.
- 4.23. 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**

- 4.24. All measures under the Great British Insulation Scheme must be completed after 30 March 2023 and on or before 31 March 2026.
- 4.25. All measures in a retrofit, both insulation and heating, must be completed within 3 months of the DOCI of the first insulation measure to be installed in that retrofit.
- 4.26. 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.
- 4.27. 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.
- 4.28. 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**

- 4.29. 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.
- 4.30. 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.
- 4.31. 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.
- 4.32. 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.
- 4.33. Relevant health and safety checks and procedures for removal must be followed.
- 4.34. 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.
- 4.35. 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.

4.36. Whilst we await industry to develop a standard methodology and quality assurance framework, currently there is no set list of qualifications for recommending insulation<sup>28</sup>. However, we recognise the [IAA Certificate Scheme](#) or anyone with NVQ Level 2 in [Cavity Wall Insulation Surveying and Extraction](#) 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 4.35.
- 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<sup>29</sup>.

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<sup>28</sup> For more information, see "Supply Chain" on P.76 of the [Great British Insulation Scheme \(2023-2026\) & Amendments to ECO4 Regulations](#) Government Response.

<sup>29</sup> 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.

- 4.37. In line with the ECO4 government response, 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.
- 4.38. In these circumstances, a suitably qualified independent professional<sup>30</sup> (e.g., 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:
- 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).
- 4.39. A suitably qualified individual must have visited and inspected the property in person for the purposes of completing the survey to assess the condition of the insulation and related building fabric. 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.
- 4.40. 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.
- 4.41. All extractions carried out to support a scheme measure must follow PAS 2035 rules and be lodged with TrustMark, following their EPR conventions. Extractions

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<sup>30</sup> A Chartered Surveyor accredited with a Royal Institution of Chartered Surveyors (RICS) membership.

must take place and appropriate evidence and photographs obtained *before* the pre-retrofit RdSAP assessment of the property is finalised.

## Interaction with Funding from Other Schemes

- 4.42. Funding for measures delivered under GBIS cannot be blended with other government schemes or grants. Any measures delivered to a property from an alternative scheme must be installed either before the project commences or after all of the GBIS measures are installed.
- 4.43. This requirement includes, but is not limited to, the following schemes:
- ECO4
  - Warm Home Discount (WHD)
  - Home Upgrade Scheme (HUG)
  - Boiler Upgrade Scheme (BUS)
  - Social Housing Decarbonisation Fund (SHDF)
- 4.44. Consumers in receipt of payments from the following schemes can be eligible for 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

## Warm Home Discount

- 4.45. Under the Warm Home Discount (WHD), energy efficiency measures may be installed under industry initiatives (II). WHD legislation rules out spending on II contributing towards GBIS<sup>31</sup>. GBIS and WHD funding cannot be combined for any measures and suppliers should have robust processes in place to identify and prevent any potential overlaps.

## Home Upgrade Scheme (HUG)

- 4.46. The Home Upgrade Grant (HUG) aims at supporting low-income households through upgrading the worst-performing off-gas-grid homes in England. These upgrades will create warmer homes at lower cost, and will support switch to low-carbon heating, contributing to both fuel poverty and net zero targets.

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<sup>31</sup> See Regulation 21 of [The Warm Home Discount \(England and Wales\) Regulations 2022](#) and Regulation 24 of [The Warm Home Discount \(Scotland\) Regulations 2022](#).



- 4.47. HUG functions as a whole house upgrade scheme. Funding cannot be blended within GBIS measures.
- 4.48. Measures delivered under HUG that are not included within the package of upgrades for GBIS may be installed in line with the key principles set out above to avoid scheme overlap. For example, insulation measures could be delivered under GBIS, followed by a heat pump under HUG after the end of the GBIS project.
- 4.49. Where HUG funding is available for multiple dwelling upgrade projects, off-gas premises upgrades should be delivered fully using the HUG funding. Where projects cannot be fully funded under HUG, ECO4 or GBIS may be used for upgrading other dwellings in the project, subject to those households meeting the ECO4 and GBIS eligibility criteria.

## **Boiler Upgrade Scheme (BUS)**

- 4.50. The Boiler Upgrade Scheme (BUS) offers capital grants to property owners to install heat pumps and in some limited circumstances, biomass boilers, to replace fossil fuel heating systems with a focus on off-gas grid homes.
- 4.51. Funding from BUS and GBIS cannot be blended for the same measure or be included within an ECO or GBIS project. Any measures in receipt of BUS are not eligible to be claimed for ECO4 or GBIS.
- 4.52. A property treated under BUS can still be treated under GBIS afterwards, if the property meets the relevant pre-retrofit SAP band requirements and GBIS eligibility requirements. The same is the case for when a property was treated under GBIS first, then after the end of the project is treated under BUS. For example, a home could be upgraded with insulation measures through GBIS and with heating measures through the BUS scheme, however, the heating measure would not be eligible for an ECO or GBIS score.

## **Warm Homes: Social Housing Fund**

- 4.53. The [Warm Homes: Social Housing Fund](#) upgrades social houses to meet an EPC band C standard. It intends to deliver warmer and more energy efficient homes whilst reducing carbon emissions and bills to social housing properties.
- 4.54. Funding from GBIS and the Warm Homes: Social Housing Fund cannot be blended for the same measure or be included within an ECO4 or GBIS project.

- 4.55. In line with WHD, HUG and BUS, any other measures delivered to a property where an ECO4 or GBIS project takes place would have to be installed either before the first ECO4 or GBIS measure, or after all the ECO4 or GBIS measures are installed.
- 4.56. Social housing funding and GBIS could work in tandem, if different measures are delivered under any social housing fund that are not included in the package of upgrades for ECO4 or GBIS. For example, insulation measures could be delivered under GBIS, followed by a heat pump under the Social Housing Decarbonisation Fund. In this example, the heat pump would not be eligible for an ECO or GBIS score or contribute to the ECO4 or GBIS project.

## **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. Table 7 gives an overview of all eligible measures under the Scheme and the related rules around tenure, starting SAP rating, and other measures installed as part of the same project.
- 5.4. The full measures table can be found as a subsidiary document on the GBIS Delivery Guidance webpage.

**Table 7: GBIS Eligible Measures for Different Tenure Types**

Measure Type	Owner Occupied Starting SAP D-G	PRS Starting SAP D-G <sup>32</sup>	Social Starting SAP E-G	Social Starting SAP D
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, Smart Thermostat, and Thermostatic Radiator Valves (TRV)		No	No	No

**Figure 6: Key for Table 7**

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

<sup>32</sup> PRS band F-G properties are only eligible in England and Wales, and only where the property is lodged with the PRS exemptions register. See 3.90 for more details.

## Insulation Measures

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

### Cavity Wall Insulation (including Party Walls)

- 5.6. 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.
- 5.7. 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).
- 5.8. 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.
- 5.9. 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.
- 5.10. 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:
- a) `CWI_0.040`
  - b) `CWI_0.033`
  - c) `CWI_0.027`

- 5.11. This information should be available on the product's test certificate. The selection should be carried out using Table 8.
- 5.12. 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 8: 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
Uninsulated Cavity	CWI_0.033	0.029 – 0.034
Uninsulated Cavity	CWI_0.027	< 0.028
Cavity wall partial-fill insulation	CWI partial_fill	All
Party cavity wall insulation	PWI_cavity	All

- 5.13. 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.
- 5.14. 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.
- 5.15. 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)

- 5.16. 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.
- 5.17. 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.
- 5.18. 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 99. 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 9: E/I/HWI U-Value variants for partial project scores**

Starting wall U-value (W/m <sup>2</sup> K)	Finishing wall U-value (W/m <sup>2</sup> K)	Finishing wall U-value (W/m <sup>2</sup> K)	Finishing wall U-value (W/m <sup>2</sup> K)	Finishing wall U-value (W/m <sup>2</sup> 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			

- 5.19. 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. 0 specifies the starting U-value that should be selected based on wall type and age.

**Table 10: Starting U-values of various wall constructions by age and location for England and Wales, and for Scotland**

Wall Type	England and Wales Age	England and Wales Starting U-Value	Scotland Age	Scotland Starting U-value
<b>Solid brick</b>	Before 1976	1.7	Before 1976	1.7
<b>Solid brick</b>	1976 - 1982	1	1976 - 1983	1
<b>Solid brick</b>	1983 - 1995	0.6	1984 - 1991	0.6
<b>Solid brick</b>	From 1996	0.45	From 1992	0.45
<b>Cavity as built</b>	Before 1976	1.7	Before 1976	1.7
<b>Cavity as built</b>	1976 - 1982	1	1976 - 1983	1
<b>Cavity as built</b>	1983 - 1995	0.6	1984 - 1991	0.6
<b>Cavity as built</b>	From 1996	0.45	From 1992	0.45
<b>System build</b>	Before 1967	2.0	Before 1965	2.0
<b>System build</b>	1967 - 1975	1.7	1965 - 1975	1.7
<b>System build</b>	1976 - 1982	1	1976 - 1983	1
<b>System build</b>	1983 - 1995	0.6	1984 - 1991	0.6
<b>System build</b>	From 1996	0.45	From 1992	0.45
<b>Stone</b>	Before 1976	1.7	Before 1976	1.7
<b>Stone</b>	1976 - 1982	1	1976 - 1983	1
<b>Stone</b>	1983 - 1995	0.6	1984 - 1991	0.6
<b>Stone</b>	From 1996	0.45	From 1992	0.45
<b>Cob</b>	Before 1996	0.6	Before 1999	0.6
<b>Cob</b>	From 1996	0.45	From 1999	0.45



<b>Timber frame</b>	Before 1949	2.0	Before 1949	2.0
<b>Timber frame</b>	1950 - 1966	1	1950 - 1964	1
<b>Timber frame</b>	1967 - 1975	0.6	1965 - 1975	0.6
<b>Timber frame</b>	From 1976	0.45	From 1976	0.45
<b>Filled cavity</b>	Before 1976	0.6	Before 1976	0.6
<b>Filled cavity</b>	From 1976	0.45	From 1976	0.45

- 5.20. 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.
- 5.21. Table 11 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.
- 5.22. The intention of Table 11 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 11: Minimum insulation thickness required to achieve each U-value change**

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

5.23. The thickness values in Table 11 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.

5.24. The minimum thickness values in Table 11 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.

5.25. Some insulation systems may not be adequately covered by Table 11, 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.

- 5.26. TrustMark's [Energy Performance Report \(EPR\) Conventions](#) 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

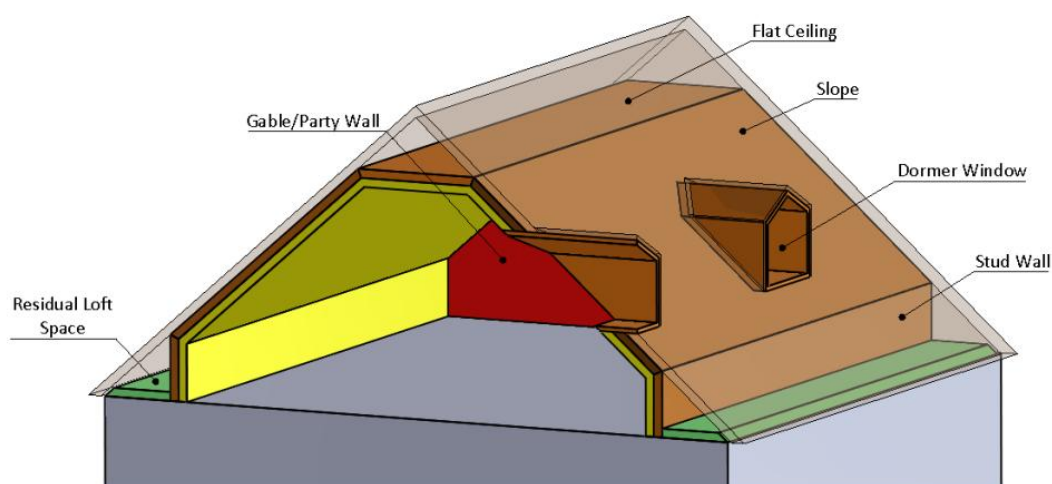
- 5.27. Loft insulation (LI) is installed between, and/or on top of, joists. There are two LI measures:
- a) LI where there is less than or equal to ( $\leq$ ) 100mm pre-existing insulation, or
  - b) LI where there is greater than ( $>$ ) 100mm pre-existing insulation.
- 5.28. It is permitted to install more than one type of loft insulation measure to a home under the Great British Insulation Scheme. This is appropriate where a loft has pre-existing loft insulation of varied depth, both less than or equal to ( $\leq$ ) 100mm and greater than ( $>$ ) 100mm. Although these must be notified separately for scoring purposes, they count as a single insulation measure.
- 5.29. Prior to the installation of any loft measures taking place, the installer, operative or assessor, and either the occupier or landlord must sign the ECO4 & GBIS Pre-Existing Loft Declaration regarding the presence of loft insulation in the property.
- 5.30. A copy of the signed declaration must be left in the loft, and should be present in all loft spaces, where a property has multiple. 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.
- 5.31. 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.
- 5.32. Where loft insulation has previously been claimed under ECO4 or a previous ECO scheme, or there is evidence showing loft insulation was present in the property

(such as a previous EPC), we will request evidence of the date the property owner took ownership of the property – this can include several items, for example the land deed. If this date precedes the previous ECO/GBIS loft insulation measure or other evidence, the latest loft insulation measure will be rejected.

## Room-in-Roof Insulation

- 5.33. 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.
- 5.34. 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.
- 5.35. 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.
- 5.36. 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.
- 5.37. 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.
- 5.38. For clarity, insulation of the residual loft area should be completed to the same building regulations standards as a typical loft insulation measure.
- 5.39. We expect that all RIRI installations are conducted in line with the government's [Best Practice Guidance for RIRI Measures](#).

**Figure 7: Areas in Room-in-Roof**



## Pitched Roof Insulation

- 5.40. 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<sup>33</sup>, 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

- 5.41. Floor insulation can only be installed to the floor in the property that is either in contact with the ground, above an unheated space (i.e., a cellar), or suspended and in contact with the outside air.
- 5.42. A floor cannot be treated if there is a room below it that contains a heat emitter such as a radiator.
- 5.43. 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). 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.

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<sup>33</sup> Please see RdSAP Conventions for the definition of a room-in-roof.

- 5.44. Separate scores for both variants, UFI and SFI, exist and should be notified accordingly.
- 5.45. 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.<sup>34</sup>
- 5.46. We expect that all solid floor insulation installations are conducted in line with the government's guidance for [Solid Floor Insulation: Best Practice](#).

## Park Home Insulation

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

## Solid Wall Insulation

- 5.48. Solid wall insulation (SWI) means internal or external insulation of a solid wall (i.e., 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.
- 5.49. 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 0.
- 5.50. 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.
- 5.51. Please note that we expect that all IWI installations are conducted in line with government's [Best Practice for Retrofit Internal Wall Insulation Guidance](#).

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<sup>34</sup> Further specific information on the installation of suspended UFI can be found in [Retrofit Floor Insulation – Suspended Timber Floors: Guide to Best Practice](#)

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## Multiple Insulation Measures

5.52. Two separate insulation measures may be eligible in the same GBIS retrofit where both measures are:

- Installed in the same retrofit,
- Promoted by the same supplier,
- An insulation measure type from the below list:
  - a) Cavity wall
  - b) Loft
  - c) Solid floor
  - d) Underfloor
  - e) Pitched roof
- Installed on or after 14<sup>th</sup> November 2024 and on or before the overall scheme deadline of 31 March 2026, and
- Installed within 3 months from the first insulation measure

5.53. Table 12 sets out example dates for insulation measures and how they impact the eligibility of the second measure.

**Table 12: Example deadlines for second insulation measures**

<b>Date of Completed Insulation (DOCI) of first insulation measure</b>	<b>Date of Completed Insulation (DOCI) of second insulation measure</b>	<b>Eligibility of the second measure</b>
13/11/2024	14/11/2024	Not eligible
14/11/2024	Between 14/11/2024 and 14/02/2025	Eligible
14/11/2024	Any time after 14/02/2025	Not eligible
31/03/2026	31/03/2026	Eligible
31/03/2026	Any time after 31/03/2026	Not eligible

- 5.54. Where multiple insulation measures are installed and do not meet these criteria, only the first insulation measure will be eligible. They will be flagged by our duplicates process. Secondary measures may be installed in addition to multiple insulation measures as normal (see 5.595.56).
- 5.55. Insulation installed under these circumstances should be notified as normal.
- 5.56. As with secondary measures, there will not be a late installation extension process for the second insulation measure beyond the 3-month deadline from the date of completed installation of the first insulation measure.

## **Secondary Measures**

- 5.57. 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.
- 5.58. The installation of time and temperature zone control (TTZC), and compensation are not eligible measures under the Great British Insulation Scheme.
- 5.59. As a result of the GBIS mid-scheme changes, smart thermostats are an eligible measure where they are completed on or after 14 November 2024 and on or before 31 March 2026. Before 14 November 2024, where a home required 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.

## **TRVs, Boiler Programmer and Room Thermostats, and Smart Thermostats**

- 5.60. There are three secondary measure types:
  - a) thermostatic radiator valves (TRVs)
  - b) Boiler programmer & room thermostat (P&RT)
  - c) Smart thermostat
- 5.61. A home may receive a combination of any of the three secondary measures. See Table 13 for detail on how to notify secondary measures.



- 5.62. Where a pre-installation RdSAP assessment records a smart thermostat and a full set of functioning TRVs the secondary heating measures cannot be claimed. This applies even where the heating controls are broken. This is because RdSAP does not associate a cost saving with the replacement of existing heating measures.
- 5.63. Whether a product is eligible to claim a smart thermostat score depends on the version of RdSAP used in the pre-retrofit assessment.
- a) Where the pre-retrofit RdSAP assessment uses RdSAP2012, smart thermostats may be notified which meet the criteria set out in the Boiler Plus Standard. That is, they must incorporate automation and optimisation. These measures will receive the same PPS as published under ECO4.
  - b) Where the pre-retrofit RdSAP assessment uses RdSAP10, smart thermostats will only be eligible for a score where the specific product is listed in the [Product Characteristics Database](#) as a smart thermostat, for use with the heat source of the home where it is installed.
- 5.64. If a property without a P&RT receives a smart thermostat, the scores for installing both a smart thermostat and a P&RT can be claimed. This is the case to simplify the number of measures. Table 13 outlines the scores which should be claimed, as well as the notification approach which should be taken.

**Table 13: P&RT and Smart thermostat scenarios**

Measure Installed	Pre-Installation Heating Controls	Installation Date	Score to be Claimed
Completion of TRVs	Incomplete or none	Any	TRV score
P&RT	No programmer and/or room thermostat	Any	Programmer & room thermostat score
Smart thermostat	No programmer and/or room thermostat	DOCI after 14 November 2024	Smart thermostat score Programmer & room thermostat score

Smart thermostat	No programmer and/or room thermostat	DOCI before 14 November 2024	Programmer & room thermostat score only
Smart thermostat	Programmer and room thermostat	DOCI after 14 November 2024	Smart thermostat score
Smart thermostat	Programmer and room thermostat	DOCI before 14 November 2024	None

- 5.65. Where the notification deadline has passed for the smart thermostat measure, an extension request should be submitted. Smart thermostat measures notified before the coming into force date of the legislative amendment will be held with the status 'On Hold'. When the legislation comes into force, these measures will be processed.

## Insulation Requirements for Secondary Measures

- 5.66. 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.
- 5.67. 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.
- 5.68. 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

- 5.69. 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.
- 5.70. Where the primary measure is rejected but there is a second eligible insulation measure in the same retrofit, the secondary measures may still be eligible. See the 'Errors in Notifications' section of our Supplier Administration guidance for more detail.
- 5.71. 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

- 5.72. A smart meter is a digital electricity and gas meter which displays accurate energy usage readings in near real time.
- 5.73. Smart meters are not an eligible GBIS measure and will not factor into any score. However, installers are mandated to provide advice to customers on the benefits of smart meters. This advice must take the form of giving the customer a leaflet, either physically or electronically, produced by Smart Energy GB.
- 5.74. This advice must be provided prior to the installation of the first measure within the retrofit. This advice can be given either electronically or in print.

- 5.75. To encourage the installation of smart meters, a voluntary pledge has been introduced to ECO4 and GBIS<sup>35</sup>. It is a requirement to offer this pledge to consumers who do not currently have a smart meter installed in their home.
- 5.76. The Retrofit Assessor will discuss the benefits of having a smart meter installed, and then ask if the consumer would like to opt in to sign a voluntary pledge. If they agree, the Retrofit Coordinator will lodge this with TrustMark using a tick box on the lodgement during the project creation. This will allow government to undertake future research into the success of this policy.
- 5.77. The responsibility for organising a smart meter installation will lie with the consumer, though the pledge should provide information on how to arrange an installation. We expect pledges to be created in line with government guidelines.
- 5.78. The process of getting a smart meter installation continues as usual following the voluntary pledge.
- 5.79. There can be no penalties enforced if a consumer does not follow through with the installation following the pledge, or if a consumer does not want to sign the pledge. The voluntary pledge has no impact on a consumer's eligibility to the scheme.
- 5.80. The provision of this advice will be confirmed by the Retrofit Coordinator as part of a declaration during the lodgement of the measure in the TrustMark Data Warehouse.

## **Standards for the Installation of Measures**

- 5.81. Suppliers should ensure that the installation of a measure is carried out in accordance with the relevant standards.
- 5.82. The installation under the scheme measure should be carried out:
  - a) By a PAS installer, or under the responsibility of, a person certified to PAS2030:2023.
  - b) In accordance with relevant provisions of PAS 2030:2023, PAS2035:2023 building regulations and any other applicable regulations.

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<sup>35</sup> For more information about the pledge, please see [Request your smart meter | Smart Energy GB](#).

- 5.83. In September 2023, the British Standards Institution (BSI) published updated standards, the PAS 2035/2030:2023 standards. An 18-month transition was agreed between DESNZ, UKAS, BSI and TrustMark to allow time for industry to adopt the changes in PAS 2035/2030:2023. This transition period ended on 30th March 2025, at which point BSI withdrew PAS 2035/2030:2019. During this transition period, either set of standards was eligible. After the withdrawal of PAS 2035/2030:2019, only PAS 2035/2030:2023 is valid. DESNZ and TrustMark published details on the transitional arrangements, including how projects started under PAS2035:2019 can be converted to PAS2035:2023<sup>36</sup>.
- 5.84. 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 and have a relevant certificate of lodgement. Where non-compliance with TrustMark requirements is detected and the TrustMark certificate of lodgement is voided, we will refer these measures or projects to our rejections process.
- 5.85. An 'operative' is defined in PAS 2030:2023 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"<sup>37</sup>. 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.
- 5.86. 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.
- 5.87. TrustMark registered businesses must be certified as compliant with PAS 2030:2023 by a PAS 2031:19 accredited scheme provider or certification body. All installers registered with TrustMark must deliver energy efficiency measures within the scope of PAS 2035:2023 and PAS 2030:2023<sup>38</sup>. Furthermore, the measures delivered under the PAS 2035 include:
- a) loft insulation

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<sup>36</sup> For more information, see the [letter published by the Department of Energy Security and Net Zero](#) on March 5<sup>th</sup> 2025.

<sup>37</sup> See PAS 2030:2023 Paragraph 3.12

<sup>38</sup> See [TrustMark Framework Operating Requirements](#).

- b) park home insulation
- c) room-in-roof insulation
- d) cavity wall insulation
- e) solid wall insulation
- f) pitched roof insulation
- g) flat roof insulation
- h) under floor insulation

- 5.88. 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**

- 5.89. 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**

- 5.90. Guarantee requirements and standards will be mandated by TrustMark via their registration and compliance. Any measure lodged with TrustMark that does not meet relevant guarantee requirements, enforced via TrustMark, will not be considered a qualifying Great British Insulation Scheme measure.
- 5.91. Appropriate 25-year guarantees, which have been reviewed and are considered to meet the TrustMark Framework, are listed on [TrustMark's website](#).
- 5.92. Suppliers will not need to supply us with the guarantee codes as part of the Great British Insulation Scheme notification template.
- 5.93. 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 [GBIS.enquiry@ofgem.gov.uk](mailto:GBIS.enquiry@ofgem.gov.uk) prior to seeking to install such measures.

## **Consumer Contributions**

- 5.94. From Summer 2024, during the collection of customer data, operatives are required to input the financial amount that the consumer has contributed towards the installation of any Great British Insulation Scheme measure.
- 5.95. This information should be recorded in the 'Customer Contribution' field within the TrustMark Retrofit Portal lodgement process with care taken to ensure that the figure is accurate.
- 5.96. The Department of Energy Security and Net Zero and/or Ofgem may request evidence confirming that the amount recorded on the submission is correct, such as: an invoice, bank statement or any other documentation, clearly illustrating the contribution transaction.
- 5.97. The data collected in this field may be shared with the Department of Energy Security and Net Zero and/or Ofgem, where it would be subject to analysis.

## 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. Ofgem will collate scores throughout the Scheme; and at Scheme-end, Ofgem will add up 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.<sup>39</sup> 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.<sup>40</sup>
- 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.

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<sup>39</sup> Scores in the Great British Insulation Scheme do not require the 20% deflator that is applied to partial project scores under ECO4.

<sup>40</sup> Information on how the scores were calculated can be found in our consultation on the ECO4 scoring methodology, and the associated decision document: [Energy Company Obligation \(ECO4\) Consultation: scoring methodology part 1 and 2 decision | Ofgem](#)



- 6.6. Any RdSAP assessments produced for PAS retrofits should be lodged, as PAS requires, in TrustMark's Data Warehouse. The timing of the assessment determines which version of RdSAP should be used for the assessment. See 4.12-4.17 for more details.
- 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 14 below.

**Table 14: 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 15: 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 **Error! Reference source not found.**Table 15). 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 eligibility 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 4.

**Table 16: 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
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- 6.19. Heat sources which refer to 'LPG' rather than 'bottled LPG' are for what SAP calls 'bulk' LPG (i.e. a home has an LPG tank which is topped up by a road tanker).

## Proxies

- 6.20. Proxies are used for rare heating sources for which there is no score available.
- 6.21. Where a supplier installs a measure and the heating source is not reflected in the scores Matrix, Table 17 is used to determine which heating source is used as a proxy for the actual heating source.
- 6.22. Please note that Table 17 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 17, allowing the correct partial project score to be awarded.

**Table 17: 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

- 6.23. Where a heating source is identified which is not included in the Scores Matrix or Table 17, suppliers should contact Ofgem to determine the most appropriate course of action.

### Percentage of Property Treated (POPT)

- 6.24. The published scores take into consideration that it is often not possible to treat 100% of a property when a particular measure is installed.
- 6.25. 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.
- 6.26. 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.
- 6.27. 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 6.29. 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.

### Percentage of Property Treated Calculation

- 6.28. 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%**

- 6.29. 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.
- 6.30. 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:

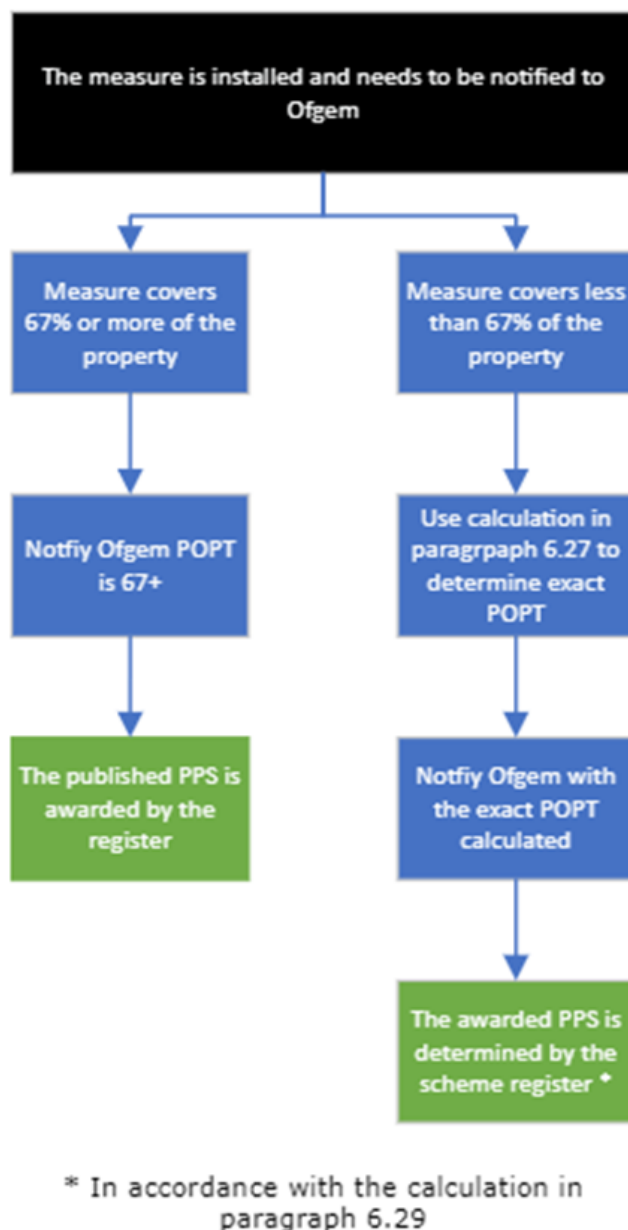
- a) Actual POPT is the percentage of property treated by the measure, and
  - b) Average POPT is the average POPT factor which applies to the measure, which is listed in the PPS matrix.
- 6.31. For example, consider an EWI measure installed to a property with a starting intermediate SAP band of low F and with a total floor area <73m<sup>2</sup>. 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.
- 6.32. 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:

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

- 6.33. Actual POPT, when expressed as a percentage (e.g., 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

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

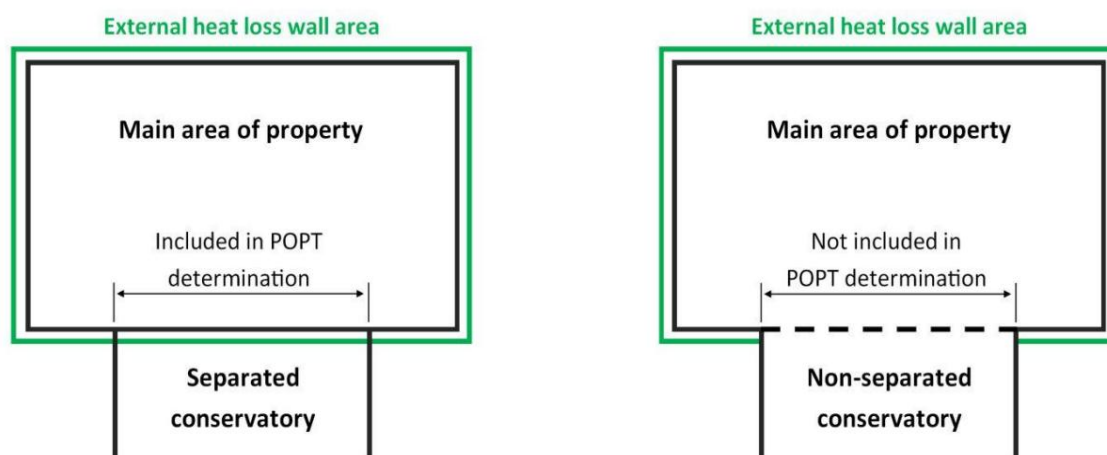


## Wall Insulation

- 6.35. For wall insulation, POPT is 100% when the total external heat loss wall area of the property is insulated as part of the measure, where the external heat loss wall area is calculated as the net area of walls after subtracting the area of windows and doors. Wall(s) of a flat which are adjacent to an unheated corridor are considered external heat loss walls. Walls of a flat adjacent to a heated corridor are not external heat loss walls and do not contribute to the POPT of a wall insulation measure<sup>41</sup>.
- 6.36. 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 6.29.
- 6.37. 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.
- 6.38. 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.
- 6.39. 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.
- 6.40. 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.

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<sup>41</sup> For further information, see RdSAP Convention 2.03.

**Figure 9: POPT Diagram for Properties with Fully Glazed Conservatories**

- 6.41. 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 9.
- 6.42. 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.
- 6.43. 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.
- 6.44. 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.
- 6.45. 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 18: 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 <sup>2</sup> and is to be treated with EWI. One wall with an area of 15m <sup>2</sup> 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 <sup>2</sup> , of which 15m <sup>2</sup> is of cavity wall construction and 35m <sup>2</sup> is solid wall.	<p>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 6.30.</p> <p>If 20m<sup>2</sup> of the available 35m<sup>2</sup> 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 6.30.</p> <p>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

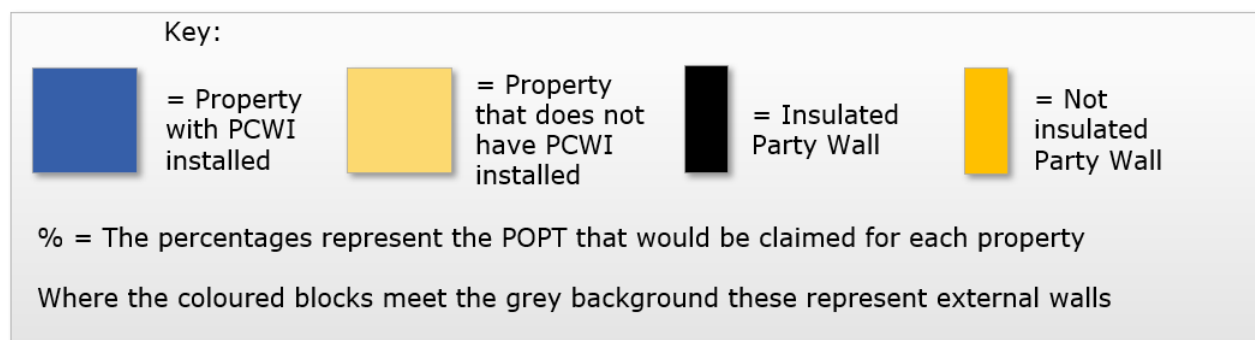
- 6.46. For party cavity wall insulation (PCWI), 100% POPT is the insulation of all party cavity walls. POPT should be calculated based on the area of the party cavity walls that has been insulated, divided by the total area of party cavity wall.

- 6.47. 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.
- 6.48. 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

- 6.49. 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**

- 6.50. 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. If the pre-existing insulation has a varied depth (LI  $\leq 100\text{mm}$  and LI  $> 100\text{mm}$ ), both measures must be notified with the appropriate adjusted POPT and will be counted as a single insulation measure.
- 6.51. 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 notified – 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

- 6.52. 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.
- 6.53. When calculating POPT for a roof insulation measure, the plan area (i.e., 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.
- 6.54. 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.
- 6.55. The roof area of conservatories (separated or non-separated) should not be included in the determination of POPT.
- 6.56. 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.
- 6.57. 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 5.16 onwards. The wall type will generally be timber frame.
- 6.58. 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 6.52 explains what is considered to be 100% of a RIRI measure.

- 6.59. 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.
- 6.60. The determination of the residual area is the same regardless of whether the RIRI 'residual area insulated' score or the RIRI 'residual area uninsulated' score is being claimed. To claim the 'residual area insulated' score, the entire residual area must be insulated.
- 6.61. If there is no residual lost area surrounding the RIR, the 'residual area insulated' score should be claimed.
- 6.62. 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 (i.e., it could be left uninsulated, but the POPT would need to be reduced accordingly).

## Examples of Calculating POPT for Roof Insulation

- 6.63. Table 19 presents examples of calculating POPT for roof insulation for dwellings with different roof constructions.

**Table 19: 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%.

<p>Example 2: a property has a total roof area of 100m<sup>2</sup>, where 28m<sup>2</sup> is flat roof and 72m<sup>2</sup> is pitched roof.<sup>42</sup></p>	<p>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.</p> <p>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 notified, and the score awarded will be modified to reflect this.</p> <p>The area covered by the pitched roof is 72m<sup>2</sup> of the total 100m<sup>2</sup> 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.</p>
<p>Example 3: a ground floor flat has a single storey extension which comprises 20% of the heated area of the property.</p>	<p>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 6.30.</p>
<p>Example 4: a property with a single pitched roof of 80m<sup>2</sup> containing an RIR with a floor area of 20m<sup>2</sup>.</p>	<p>If only the loft area surrounding the RIR is insulated (i.e., as a loft insulation measure), the POPT would relate to the loft area insulated, which is 60m<sup>2</sup> of the total 80m<sup>2</sup> roof area.</p> <p>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.</p>
<p>Example 5: a property has a single pitched roof containing a RIR.</p>	<p>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.</p> <p>If the residual area is insulated, the deemed score for 'room-in-roof insulation – residual area insulated' should be selected.</p> <p>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.</p>

<sup>42</sup> For the purposes of calculating POPT for roof insulation measures, roof areas should be measured in the horizontal plane i.e., the area of a pitched roof is equal to the area of floor beneath it.



<p>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<sup>2</sup>, of which the pitched roof containing the RIR has a plan area of 72m<sup>2</sup>, which includes any residual areas, and the flat roof has a plan area of 28m<sup>2</sup>.</p>	<p>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%.</p> <p>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.</p> <p>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%.</p> <p>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.</p>
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## Secondary measures

- 6.64. 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.
- 6.65. Where thermostatic radiator valves (TRVs) are installed, POPT should reflect the proportion of the home heated by the radiators receiving TRVs.

## Building Extensions

- 6.66. 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.
- 6.67. 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**

- 6.68. An innovation uplift may be awarded to measures that can demonstrate an improvement over comparable measures<sup>43</sup> currently deliverable under the Great British Insulation Scheme.
- 6.69. 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.
- 6.70. Innovation uplifts will only be awarded for measures within the low-income eligibility group and/or delivery to social housing band D.
- 6.71. 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%.
- 6.72. 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 eligibility 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.
- 6.73. The general IM cap will be set as 10% of a supplier's total low-income minimum obligation. That is, up to 10% of the 20% low-income minimum obligation.
- 6.74. The innovation uplift is capped at 10% of a supplier's low-income eligibility 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. Innovation measures are fully optional, and suppliers are not obliged to deliver any to complete their Great British Insulation Scheme obligations.

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<sup>43</sup> Article 32 of the ECO4 Order defines comparable measures as measures that would otherwise be promoted by the participant and are commonly available on the market in Great Britain.

- 6.76. For more details on the innovation application process see our [ECO4 Guidance: New Measures and Products](#).

## Uplifts

- 6.77. 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 19.
- 6.78. The uplifts available in the Great British Insulation Scheme are:
- a) 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 eligibility group.
  - b) 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 eligibility group.
  - c) Floor area uplifts. These uplifts apply to any scores awarded to measures installed in properties in the smallest two floor area segments (see Table 15). 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.

## Example Score Calculations with Uplifts

- 6.79. 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 eligibility route. It has a starting intermediate SAP band of low E and floor area of 150m<sup>2</sup>. A cavity wall insulation measure is installed, which is an approved standard innovation measure. 100% of the measure is installed.
- a) The insulation measure has a base score of 198.8.
  - b) The off-gas-rural uplift applies to this measure, with a value of  $(198.8 \times 0.2) = 39.76$
  - c) The 25% innovation uplift applies to this measure, with a value of  $(198.8 \times 0.25) = 49.7$

d) Therefore, the total score for this measure is:

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

## 7. Notifications

- 7.1. This chapter contains simplified guidance around the measure notification process and template. More details can be found in the [GBIS Supplier Administration Guidance](#).
- 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. 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 e.g. the starting SAP rating of the property.

### Timing of Measure Notifications

- 7.4. 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.
- 7.5. 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.
- 7.6. 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 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?**

- 7.7. 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 2030:2023 and PAS2035:2023, the meaning of handover is defined within these documents.
- 7.8. 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.

## **Notifications of Late Measures**

- 7.9. 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.
- 7.10. For example, when 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.
- 7.11. 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 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.

- 7.12. 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.
- 7.13. Please see our [Great British Insulation Scheme Supplier Administration Guidance](#) document for more detail on late measures and extension requests.

## **Fair and Transparent Processing**

- 7.14. In this section is covered guidance around GDPR and data processing for information which suppliers obtain about occupants or landlords of premises.
- 7.15. 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.
- 7.16. 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.
- 7.17. 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.
- 7.18. 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.
- 7.19. The General Data Protection Regulation (UK GDPR) requires anyone collecting personal data to give the data subject (i.e., in the case of Great British Insulation Scheme the occupant or the landlord) a Privacy Notice.
- 7.20. 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](#). This is a Great British Insulation Scheme Reporting Working Group document and not an Ofgem document<sup>44</sup>.

- 7.21. 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.
- 7.22. 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.

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<sup>44</sup> For further information, see our [ECO Privacy Policy](#).



## 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 Framework](#).
- 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 supplier processes relating to measures notified to us by suppliers. For example, this includes documentation to prove that a person is a member of the low-income eligibility 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](#). 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](#).
- 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.

### GBIS Flex Audit

- 8.6. Suppliers are expected to provide and hold sufficient evidence for all Flex projects and measures to ensure eligibility and compliance requirements have been met.

- 8.7. 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.
- 8.8. Where we find evidence held and provided by the supplier to be insufficient or incorrect, this evidence may look to be reviewed with LAs. Compliance action may be taken if not rectified.

## **Fraud Prevention**

- 8.9. Ofgem takes fraud seriously. A dedicated Counter-Fraud team undertakes activities to detect, prevent and deter fraudulent activity across ECO including the Great British Insulation Scheme<sup>45</sup>.
- 8.10. 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.
- 8.11. 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.
- 8.12. It is the responsibility of the supplier to ensure they are satisfied with the level of evidence received from installers.
- 8.13. 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

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<sup>45</sup> Further information on the work of the counter fraud team, a contact number, e-mail address and a whistleblowing line are available at [Counter fraud for environmental and social programmes | Ofgem](#).

- 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
  - 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.
- 8.14. 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.
- 8.15. 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.
- 8.16. All suppliers are invited to attend the ECO and Great British Insulation Scheme Industry Fraud Prevention and Compliance Committee<sup>46</sup>, a forum for discussing common fraud risks and issues across the industry and to drive best practice.
- 8.17. Suppliers should, in all instances, promptly report any instances of suspected fraud to the Ofgem Counter-Fraud team at [counterfraud@ofgem.gov.uk](mailto:counterfraud@ofgem.gov.uk).
- 8.18. 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.
- 8.19. 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.

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<sup>46</sup> 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.

- 8.20. In addition, where evidence of fraud is found this should be reported by the obligated supplier to Action Fraud<sup>47</sup>, the Police<sup>48</sup>, or any relevant accreditation bodies.

## **Documentation Guidelines**

- 8.21. As the administrator of ECO, 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.
- 8.22. This section outlines the existing requirements and expectations when it comes to the completion of documentation and notification / lodgement of information in the ECO4 Registers or on the TrustMark database that is used to support the eligibility and compliance of an ECO measure or project.
- 8.23. The information in the below paragraphs outlines the minimum standards that Ofgem expects to be met when completing any ECO documentation or notifying / lodging any ECO information. Any measures installed during ECO4 where documentation or information does not meet these standards may be considered for rejection.

## **Quality of documentation**

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

## **Evidence must be complete**

- 8.25. Documentation must be completed fully. All pages of any documentation must be present unless you have prior agreement from the energy company or funding supplier.
- 8.26. All documentation must be legible, including where photographic evidence of documents (e.g. 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

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<sup>47</sup> Action Fraud provide a central point of contact for reporting fraud in the UK. See <https://www.actionfraud.police.uk/> for more information.

<sup>48</sup> If the fraud is ongoing, it should be reported directly to the Police.

comments are required on documentation, these must be detailed and not one-word answers.

- 8.27. Information provided in documentation should be consistent across documents.
- 8.28. 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.
- 8.29. 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, which may result in a late penalty.
- 8.30. Evidence should be provided as standalone files in pdf format where possible, and not embedded within other documents or files.
- 8.31. All photos used to support the eligibility or compliance of a measure must be date and geo-stamped. Photos used as evidence should retain accurate information and not have their details tampered with.

## **Digital Software Use**

- 8.32. Some obligated energy suppliers may request confirmation of which electronic application or software is being used in the delivery of ECO measures. A demonstration of the software may be required. It must not be possible to auto-populate fields which require information specific to a premises or measure, such as dates or signatures.
- 8.33. 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.
- 8.34. Operatives must ensure that any fields are not modified at a later date unless a new version is created and resigned by the appropriate signatory. 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 or signature of documents that were completed electronically.

- 8.35. The format of any document must be compatible with standard software so that they can be opened and read by Ofgem and suppliers without the need to purchase new or additional software.
- 8.36. 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, i.e. the brand of the application should not show on paperwork which has been manually completed and wet signed.
- 8.37. Where customers have signed documents electronically or as a wet signature, they must have access to documents after any works are completed. This can include paper versions of documents.
- 8.38. Software can be used to auto-generate digital signatures, provided:
  - a) Meta data for these signatures is attached or available upon request following audit. The meta data must show the date and time and the name of the individual who signed.
  - b) The appropriate individual applies their signature individually to each box that requires a signature.
- 8.39. Where we have reason to believe people have not applied their own signature to individual boxes that require signatures, the project may be rejected.

## **Signature Application**

- 8.40. Signatures and dates must only be used where they are applied or embedded uniquely in the documents by the relevant person. Wet signatures must be applied with a pen and electronic signatures preferably with a stylus, although use of a finger is also acceptable. Any signatures, whether digital, wet or electronically applied with a finger or stylus, must be applied individually to each box by the relevant individual. Following any investigation, measures connected to documentation containing signatures where there is evidence that they were not uniquely applied by the relevant signatory may be rejected.
- 8.41. There should be no amendments to signatures or dates.
- 8.42. Sections of documents which have been signed should not be modified after signing. Where it is necessary to do so, a new version should be created and re-signed by the appropriate signatory, as per paragraph 8.34.

- 8.43. Households may be required to sign multiple documents, but in doing so it provides us with the assurance that they have seen, read and understood the contents of each document.
- 8.44. Installers should ensure the signatures and signature boxes are accessible and should provide instructions on how to complete these correctly if necessary.

## **GDPR considerations**

- 8.45. Compliance with data protection law, including the UK GDPR Principles, is essential. 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 ECO should be redacted.

## **Signature Practices that are Not Permitted**

- 8.46. Many of the documents required for measure submission are declarations. In signing them, the party is confirming the information recorded is true and accurate. It is a criminal offence to knowingly make a false declaration, and such an offence may be punishable by a fine, imprisonment or both.
- 8.47. Users of ECO documents should 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.
- 8.48. The following section outlines activity in relation to signature provision on ECO 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 ECO measures.

## **Signature Forgery**

- 8.49. Where Ofgem detects any suspected fraudulent activity including falsifying statements and forging signatures and determines fraudulent activity has occurred, this will result in the associated measure or project being processed for rejection. In addition, matters may be reported to the Police, Action Fraud, or other law enforcement agencies such as Trading Standards.

## **Signatures Being Signed 'On Behalf' of Someone Else**

- 8.50. Signatures should be given by the appropriate party in question. Where operative signatures are required, 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.
- 8.51. The signature should not be provided by any other individual, for example a colleague or office staff, 'on behalf' of the operative.
- 8.52. Where the eligible consumer is unable to sign, for example due to a disability, we may allow someone to sign on their behalf. This should be a relative, neighbour, friend or similar and this not be the operative or retrofit coordinator or another member of the supply chain.
- 8.53. Please reach out to [ECO@ofgem.gov.uk](mailto:ECO@ofgem.gov.uk) to request signatures on behalf of the consumer to be allowed in specific cases. If allowed, a declaration should be provided alongside the forms with sufficient explanation of the consumers circumstances. The individual signing on behalf of the consumer must sign everywhere the signatory applies and should not sign in the name of the person they are signing on behalf of. The rest of the signature guidance applies, and declarations must be provided at the time of notification to the supplier. Declarations and requests to the ECO mailbox to sign on behalf of someone else will not be accepted at a later date or retrospectively.
- 8.54. Following any investigation, measures connected to documentation containing signatures where there is evidence that they were not signed uniquely or applied digitally by the relevant signatory may be rejected.

## **Photocopying**

- 8.55. Every form should be completed manually to ensure that the information provided is accurate to the property and relevant measure. We would like to draw particular attention to completion of the Pre-installation Heating Checklist – photocopying or copying and pasting from other Pre-installation Heating Checklist should not be used to complete any part of this form.
- 8.56. To reiterate, signatures must be obtained for each individual document whether it is the signature of the operative, customer, landlord or property management company.



- 8.57. Photocopying or screen grabbing to duplicate a signature and apply it elsewhere is not acceptable. 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.

## 9. Appendices

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## 10. Appendix 1 – Associated scheme documents

GBIS template	Purpose of GBIS Template	Mandatory Signatories
ECO4 & GBIS Eligibility Requirements and Pre-installation Form	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 measure.	<ul style="list-style-type: none"> <li>• Occupier Retrofit Coordinator</li> <li>• Owner</li> </ul> <p>Landlord/Social Landlord</p>
ECO4 & GBIS Post-Installation Form	Captures the details of the completed measure/s including POPT calculation.	<ul style="list-style-type: none"> <li>• Occupier</li> <li>• Retrofit Coordinator</li> <li>• Installer/s</li> <li>• Owner</li> </ul>
Pre-existing Loft Insulation Declaration	To confirm that extraction has not taken place on pre-existing loft insulation outside of the relevant GBIS measure. It can be used either for ECO4 or Great British Insulation Scheme.	<ul style="list-style-type: none"> <li>• Operative</li> <li>• Occupier/Landlord</li> </ul>

10.2. 8 outlines our Great British Insulation Scheme templates along with a brief

GBIS template	Purpose of GBIS Template	Mandatory Signatories
ECO4 & GBIS Eligibility Requirements and Pre-installation Form	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 measure.	<ul style="list-style-type: none"> <li>• Occupier Retrofit Coordinator</li> <li>• Owner</li> <li>• Landlord/Social Landlord</li> </ul>
ECO4 & GBIS Post-Installation Form	Captures the details of the completed measure/s including POPT calculation.	<ul style="list-style-type: none"> <li>• Occupier</li> <li>• Retrofit Coordinator</li> <li>• Installer/s</li> <li>• Owner</li> </ul>
Pre-existing Loft Insulation Declaration	To confirm that extraction has not taken place on pre-existing loft insulation outside of the relevant GBIS measure. It can be used either for ECO4 or Great British Insulation Scheme.	<ul style="list-style-type: none"> <li>• Operative</li> <li>• Occupier/Landlord</li> </ul>

description of each document.

**Table 20: Templates for The Great British Insulation Scheme**

GBIS template	Purpose of GBIS Template	Mandatory Signatories
ECO4 & GBIS Eligibility Requirements and Pre-installation Form	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 measure.	<ul style="list-style-type: none"> <li>• Occupier Retrofit Coordinator</li> <li>• Owner</li> <li>• Landlord/Social Landlord</li> <li>• Occupier</li> </ul>
ECO4 & GBIS Post-Installation Form	Captures the details of the completed measure/s including POPT calculation.	<ul style="list-style-type: none"> <li>• Retrofit Coordinator</li> <li>• Installer/s</li> <li>• Owner</li> </ul>
Pre-existing Loft Insulation Declaration	To confirm that extraction has not taken place on pre-existing loft insulation outside of the relevant GBIS measure. It can be used either for ECO4 or Great British Insulation Scheme.	<ul style="list-style-type: none"> <li>• Operative</li> <li>• Occupier/Landlord</li> </ul>

## **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 measures.

### **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 (e.g., 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.

## 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<sup>49</sup>. 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

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<sup>49</sup> Or in Scotland, the owner's interest or right, tenant's or sub-tenant's interest.

private 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 landlord and occupier statement where no written tenancy agreement exists. This can be found as Template 2 of the [ECO4 & GBIS Templates to Evidence Private Domestic Premises and Social Housing](#).

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, i.e., 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.



- 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 (e.g., 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.<sup>50</sup>
- 11.18. Where the relevant interest is not registered, the supplier must provide different evidence depending on whether:

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<sup>50</sup> 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.

- 11.19. The person who owns the relevant interest occupies the premises ('the owner occupier'), or
- 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 residence<sup>51</sup> to demonstrate that the owner-occupier has the current right to occupy the premises (i.e., the premises have not been leased to another person). The supplier will need to provide a copy of one of the following:
- a) Title deeds (we will accept other deeds and legal declarations that explicitly state that the person owns the premises)<sup>52</sup>, OR
  - b) 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
  - c) A completed Ofgem template<sup>53</sup> and evidence proving that the owner occupier resides at the premises which:
    - a) 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
    - b) Provides a declaration from a professional third party confirming that, following an investigation, the title deeds have been lost or destroyed and he/she is satisfied that the occupier is the freeholder/the person holding the owner's interest or right.

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<sup>51</sup> Proof of residence can be in the form of a benefit letter, or the list of official documents referenced in paragraph 11.59.

<sup>52</sup> 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

<sup>53</sup> See [ECO4 & GBIS Templates to Evidence Private Domestic Premises and Social Housing](#).

## **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:
- a) address of the premises
  - b) term of the tenancy, and
  - c) names and signatures of the tenant and landlord, OR
- 11.25. A completed Ofgem template<sup>54</sup> and evidence proving that the named tenant resides there. These templates are:
- a) in the case where the written tenancy agreement has expired, signed by both landlord and tenant confirming the occupancy agreement, OR
  - b) in the case where no written tenancy agreement exists, signed by both landlord and tenant confirming the occupancy agreement,
  - c) in the case where there is no tenancy agreement, an occupancy agreement signed by the executor/administrator of the estate and the occupier.

## **Supporting Information for Demonstrating the Relevant Interest**

- 11.26. If the documentation listed proves inconclusive, i.e., the relevant interest belongs to a corporation, the supplier must ensure the entity is not a social landlord (see paragraph 11.30).

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<sup>54</sup> See [ECO4 & GBIS Templates to Evidence Private Domestic Premises and Social Housing](#).

- 11.27. If the owner-occupier or the tenant is the low-income eligibility group member, benefit letters addressed to the premises will be sufficient to demonstrate that the low-income eligibility group member resides at the premises. If the owner-occupier or the tenant is not the low-income eligibility group member, a supplier will need to produce evidence to demonstrate that the low-income eligibility group member resides at the relevant domestic premises.
- 11.28. If the supporting information for demonstrating the relevant interest is complicated due to the death of the registered owner of the property, suppliers should contact Ofgem on a case-by-case basis to discuss the available evidence.

## **Social Housing**

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

## **Identifying Social Landlords**

- 11.30. 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 1985<sup>55</sup>
  - 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 2011<sup>56</sup>
  - 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).
- 11.31. A social landlord means, in respect of premises in Scotland, a person so described in section 165 of the Housing (Scotland) Act 2010.<sup>57</sup>
- 11.32. 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

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<sup>55</sup> <https://www.legislation.gov.uk/ukpga/1985/68/contents>

<sup>56</sup> <https://www.legislation.gov.uk/ukpga/2011/25/contents>

<sup>57</sup> <https://www.legislation.gov.uk/asp/2010/17#:~:text=2010%20asp%2017&text=An%20Act%20of%20the%20Scottish,housing%3B%20and%20for%20connected%20purposes.>

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

- 11.33. The Homes and Communities Agency provide [a list of registered providers of social housing](#).
- 11.34. The Charity Commission holds a [register of organisations recognised as charitable in law](#). Not all charities must register.

## Wales

- 11.35. The Welsh Ministers maintain a [register of social landlords](#).

## Scotland

- 11.36. The Scottish Housing Regulator maintains a [register of social landlords](#).

## Determining Market Rate

- 11.37. 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
  - b) Statistics showing the premises were rented at or above market rate. See below for more information on demonstrating rent above market rate.
- 11.38. When determining whether the property is let at below market rate the rent figure should not include the additional cost of service charge.

## England

- 11.39. 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.

## Scotland and Wales

11.40. We consider market rate to be any monthly rent that is equal to or greater than the 30<sup>th</sup> 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 30<sup>th</sup> percentile for an area can be found on the following pages:<sup>58</sup>

a) **Scotland:** the 30<sup>th</sup> percentile of market rents can be found in column 3 of the [Local Housing Allowance \(LHA\) Methodology Table](#).

b) **Wales:** The 30<sup>th</sup> percentile of market rents can be found in column 2 of the [LHA table](#).

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

## Determining Council Tax Band

11.42. 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.

11.43. 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.

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<sup>58</sup> 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.

- 11.44. 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**

- 11.45. 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 (i.e., a low-income eligibility group member or a household identified as eligible by a local authority). See below for more information on how to evidence this.
- 11.46. 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.

## **Occupant requirements**

- 11.47. 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,
  - e) NHS letter or
  - f) Extract from the electoral register.
- 11.48. 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 Eligibility Group Benefit Types**

- 11.49. Documents must establish that an occupant of the premises was a low-income eligibility group member at some point during the promotion of the measure.
- 11.50. Suppliers must be able to provide evidence that the low-income eligibility group member lives at the premises where the measure is being installed. In most cases, this will be a benefit letter.
- 11.51. There are several ways to show the customer is a low-income eligibility group member. The supplier can produce one of the following:
  - a) a matched DWP reference number
  - b) a low-income eligibility group benefit letter
- 11.52. 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: Income Levels Under Child Benefit
- 11.53. If using benefit letters to prove low-income eligibility group eligibility, with the exception of Child Benefit award notice, the letter 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 eligibility group eligibility when the end date of the award falls within 12 months before the completion of the first measure.



- 11.54. Online services are available for UC recipients which provide customers' up-to-date benefit entitlement information.
- 11.55. 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.
- 11.56. We do not require full 'proof of benefit' letters or award notices. To evidence low-income eligibility 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.
- 11.57. The low-income eligibility 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**

- 11.58. Where the above benefit documentation is not addressed to the private domestic premises, further evidence showing that the low-income eligibility group member resides there will be required.
- 11.59. 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,<sup>59</sup> 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.
- 11.60. 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.
- 11.61. 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**

- 11.62. There are cases where a person changes their name, in 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 eligibility group benefit documents or other official correspondence (described above).

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<sup>59</sup> 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.

- 11.63. 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 'Template 6: Declaration of change of name' of the [Great British Insulation Scheme: Templates to evidence private domestic premises and social housing](#).

## **How to Confirm Responsibility for Children and Qualifying Young Persons**

- 11.64. Responsibility for a child or qualifying young person is defined in regulation 3 of the Child Tax Credit 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,<sup>60</sup> and that authority has placed them in the home of someone proposing to adopt them.

## **Guidance on Redacting Information**

- 11.65. 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 eligibility 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.
- 11.66. 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 eligibility 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.

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<sup>60</sup> 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.


- b) For low-income eligibility group routes which are not means tested (e.g., 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.
- 11.67. When processing any personal data or sensitive personal data, suppliers are reminded of their duties to comply with the requirements of data protection law.
- 11.68. 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 up to 31 March 2026. It is the suppliers' responsibility to keep up to date with any changes to requirements.

## Example Letters

- 11.69. These are some examples of different types of letters that you may encounter.
- 11.70. We indicate whether the documents are suitable to evidence low-income eligibility group eligibility. We have highlighted certain parts of these documents that need to be considered when determining eligibility.
- 11.71. This is non-exhaustive list of the eligible benefits or scenarios for low-income eligibility 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 can contact us [GBIS.enquiry@ofgem.gov.uk](mailto:GBIS.enquiry@ofgem.gov.uk).
- 11.72. 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), Universal Credit (UC), [not included in this guidance version],

- g) Housing Benefit,
- h) 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](http://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

DWP105  
Page 1 of 2

1.16.

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

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### 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](http://www.gov.uk)

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### Call charges

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

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### 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](http://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](http://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  
PERSON B

National Insurance Number AB123456C  
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](http://www.gov.uk/hmrc/your-charter)

#### Why we are writing to you

Thank you for telling us that your circumstances have changed.



**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
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**Family elements**

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

**Example 4: Pension Credit Guarantee Credit and Pension Credit Savings Credit benefit<sup>61</sup>**

	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

<sup>61</sup> The page containing the beneficiary's details will follow separately from this page.

**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 Rathfinder 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

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

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.

NON-DEP 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 CLW 305 Page 1 of 1

**Example 5(b): Housing Benefit exemplar letter for someone who is working:**

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

**Example 2 – Award letter for someone in work**

  
 0000441304000000

  
**Huntingdonshire**  
 DISTRICT COUNCIL  
Benefits Section, Pothinder 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: £82.62

Less Overpayment Recovery: £0.00

Benefit Awarded: £82.62

Weekly gross Rent/Council Tax is: £156.00

The Benefit Starts on: 13 Apr 2015

Weekly Eligible Rent/Council Tax: £156.00

Weekly Ineligible Service Charges: £0.00

Non dependant deductions: £0.00

**HOUSING BENEFIT**

£82.62

£0.00

£82.62

£156.00

13 Apr 2015

£156.00

£0.00

£0.00

NON-DEP NAME	GROSS INCOME (WEEK)	INCOME BAND	DEDUCT (H)	DEDUCT (COUN)
We have used the following information to work out your weekly benefit:				
<b>FINANCIAL DETAILS:</b>				
Your weekly earnings	£0.00	Family premium		£17.45
Your partner's weekly earnings	£251.66	Young Person		£66.90
Any other income (converted to wkly)	£179.60	Couple (one between 18 & pension age)		£114.85
Assumed Income from £10K Capital	£0.00	Young person		£66.90
<b>TOTAL WEEKLY INCOME</b>	<b>£431.26</b>	<b>TOTAL APPLICABLE AMOUNT</b>		<b>£266.10</b>
Disregarded income	£61.50			
Less Expenses	£0.00			
<b>INCOME USED IN CALCULATION</b>	<b>£369.76</b>			

You must tell us straight away if...

Page Ref: 1

## Example 6: Child Benefit



### Child Benefit

**Child Benefit Office**  
**HM Revenue and Customs**  
BX9 1GT

Donald Duck  
1 The Pond  
POOLE  
SW1 1MS

**Phone** 0300 322 9075 extension 02  
8:30am to 5:00pm

**Web** [www.gov.uk](http://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](http://www.gov.uk/report-changes-child-benefit)

Tell us about changes online, go to [www.gov.uk/personal-tax-account](http://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:**

Huwei: £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](http://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](http://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](http://www.gov.uk/tax-free-childcare)



## 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 20: Uplifts and Increases in the Great British Insulation Scheme**

<b>Uplift or Increase</b>	<b>Limit on Uplifts</b>	<b>Application of Uplift or Increase</b>	<b>Value</b>	<b>Notification of Uplift or Increase</b>	<b>Eligible Properties</b>
ECO4 innovation measure	10% of the low income low-income-minimum threshold of 20%	Multiplication factor uplift	25% or 45%	Applicable measures	Low-income eligibility group only
Off-gas and rural	No limit	Multiplication factor uplift	20%	All measures	Low-income eligibility group, rural and off gas properties in Scotland and Wales only

**Table 21: Caps in the Great British Insulation Scheme**

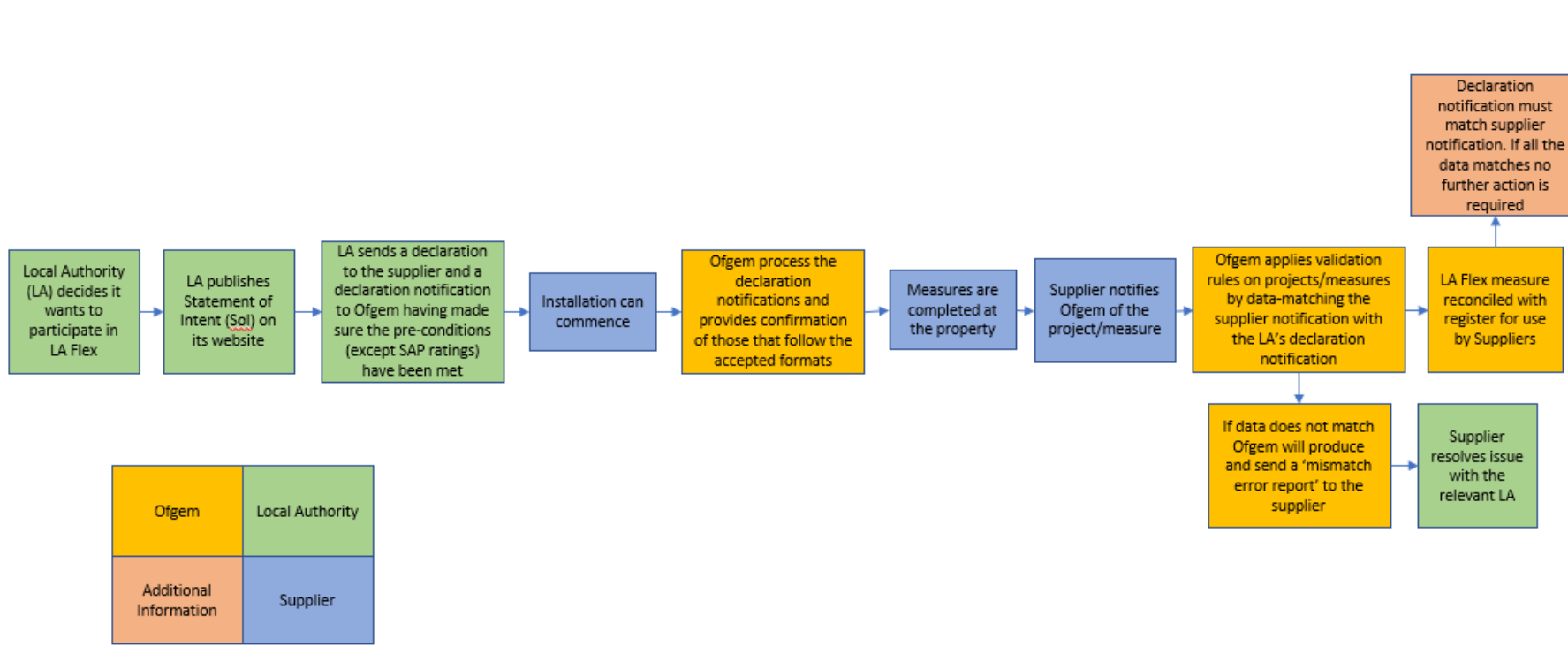
<b>Cap</b>	<b>What does the cap limit?</b>	<b>Value</b>	<b>Impact of project / measure breaching cap<sup>62</sup></b>
Innovation Measure – general	% of obligation awarded to innovation measures (cost savings value + innovation uplift)	10% of each supplier's low-income obligation	Score still awarded but with IM uplift(s) excluded
Great British Insulation Scheme Flex (Local Authority and supplier flex)	% of low income minimum requirement that can be met with Great British Insulation Scheme Flex eligibility route	80% of each supplier's low-income obligation for the year	Score still awarded, but does not contribute towards achieving low-income minimum requirement

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<sup>62</sup> 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



## **14. Appendix 5: Great British Insulation Scheme Abbreviations**

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

Abbreviation	Explanation
IMs	Innovation measures
IS	Income Support
IWI	Internal wall insulation
JSA	Income based Jobseekers Allowance
LA	Local authority
LHA	Local Housing Allowance
LIG	Low-income eligibility 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

Abbreviation	Explanation
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.
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 ECO, 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 GBIS Registers or on the TrustMark database that is used to support the eligibility and compliance of a GBIS measure.
- 15.3. The information in the below paragraphs outlines the minimum standards that Ofgem expects to be met when completing any GBIS documentation or notifying/lodging any GBIS information. Any measures installed during the Scheme where documentation or information does not meet these standards may be considered for rejection.

### **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 unless you have prior agreement from the energy company or funding supplier.
- 15.6. All documentation must be legible, including where photographic evidence of documents (e.g., 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 re-signed 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 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, i.e., 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 uniquely in the documents. Wet signatures must be applied with a pen and electronic signatures preferably with a stylus, although use of a finger is also acceptable. Signatures must not be copied and pasted. Following any investigation, measures connected to documentation containing copied and pasted signatures may be rejected.
- 15.20. All documentation must be completed, signed, and dated by the appropriate individual, such as the operative, landlord, customer, householder, or retrofit coordinator, and not on behalf of someone else. There should be no amendments to signatures or dates.
- 15.21. Households may be required to sign multiple documents, but in doing so it provides us with the assurance that they have seen, read and understood the contents of each document.
- 15.22. Installers should ensure the signatures and signature boxes are accessible and should provide instructions on how to complete these correctly if necessary.

- 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 by the supply chain 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 declaration, 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. The following paragraphs present some examples we want to draw particular attention to.

## **Signature Practices that are Not Permitted**

- 15.29. Many of the documents required for measure submission are declarations. In signing them, the party is confirming the information recorded is true and accurate. It is a criminal offence to knowingly make a false declaration, and as such an offence may be punishable by a fine, imprisonment, or both.
- 15.30. Users of ECO and the Great British Insulation Scheme documents should 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.
- 15.31. The following section outlines activity in relation to signature provision on ECO and the Great British Insulation 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 measure(s).

## **Signature Forgery**

- 15.32. Where we determine that suspected fraudulent activity has occurred (including falsifying statements or signatures), the associated measure or project will be rejected. In addition, matters may be reported to the Police, Action Fraud, or Trading Standards.

## **Copy and Pasting**

- 15.33. 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. We recommend that the operative is equipped with a stylus to ensure satisfactory signatures are captured.
- 15.34. If any instances of replicated or copied signatures occur when using electronic paperwork or a digital application, you should investigate and rectify it prior to sending to the obligated supplier.

- 15.35. Where we detect signatures have been assigned or auto populated by software, for example as the result of purpose-built software or 'software glitches', these forms will be investigated and may result in the associated measure(s) being rejected.

### **Operative Signatures Being Signed 'On Behalf' of the Operative**

- 15.36. Signatures should be given by the appropriate party in question. Where operative signatures are required, 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.
- 15.37. The signature should not be provided by any other individual, for example a colleague or office staff, 'on behalf' of the operative.

### **Photocopying**

- 15.38. Every form should be completed manually to ensure that the information provided is accurate to the property and relevant measure.
- 15.39. To reiterate, signatures must be obtained for each individual document whether it is the signature of the operative, customer, landlord or property management company.
- 15.40. Photocopying to duplicate a signature and apply it elsewhere is not acceptable. 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.