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Warm Home Discount (WHD)

Summary of Updates

WHD Guidance: England and Wales and Scotland

This document summarises the updates we have made to the WHD Guidance in England and Wales and Scotland.

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1. WHD Guidance: England and Wales

Publication date: 8 April 2026

Version number: 3

This version reflects changes to scheme policy signalled in the government response to the [Continuing the Warm Home Discount Scheme: consultation](#), and made by the Warm Home Discount Regulations 2026. We have also made general formatting and drafting improvements throughout the guidance.

About this Guidance

- The scheme years have been amended to SY16–20 in line with the policy for the continuation of WHD.
- Reference to the Supplier Obligation threshold has been amended to bring this in line with policy covering SY16-20.
- References to relevant legislation have been updated as required to the new Warm Home Discount (England and Wales) Regulations 2026, this includes the laid date and coming into effect date ('the 2026 regulations').
- Removal of reference to the Warm Home Discount (Reconciliation) Regulations 2022 and amendment regulation text.
- Edited text and new sentences to clarify that version 3.0 does not include information about the reconciliation mechanism, as this will be provided in separate guidance.

Useful Links

- New link to the 2025 Government Consultation and Government Consultation Response have been included.

Contacts

- Contact for the WHD helpline and government page on WHD have been added.

Relevant legislation

- A link to The Warm Home Discount (England and Wales) Regulations 2026 has been added.

Chapter 1

Introduction

- Removal of references to SY 12-15, replaced with references to SY16-20 and associated dates amended to reflect this.

What is the WHD scheme?

- References to Core Group 1 and 2 have been removed and replaced with a reference to the single Core Group, as part of the policy change to the scheme from April 2026.
- The drafting has been updated to more accurately reflect the groups that suppliers are legally required to support under the 2026 Regulations, replacing previous terminology with language consistent with the regulatory definitions.
- This section has been revised to enhance drafting quality and improve clarity of understanding.

Core Group

- Sections entitled 'Core Group 1' and 'Core Group 2' have been removed and replaced with 'Core Group' section to reflect policy change. This section provides information about the Core Group, including how eligibility for the scheme is determined.

Industry Initiatives

- Reference to the 2022/23 spend has been removed, as this is no longer applicable.
- The drafting has been updated to more accurately reflect the groups that suppliers are legally required to support under the 2026 Regulations, replacing previous terminology with language consistent with the regulatory definitions.

Fuel Poverty

- The EPC rating has been amended from C to D for the England poverty measurement.

Supplier roles and responsibilities

Compulsory Suppliers

- Edited text on compulsory suppliers' obligation threshold to 1,000 and removal of previous threshold which is now outdated.

Voluntary Suppliers

- Minor drafting improvements on voluntary suppliers including amending of 'application' to 'notification' and removal of references of Core Group 1 and Core Group 2, instead referring to the 'Core Group'.
- Table 1 amended to refer to a single Core Group Spending Obligation and for amended for accessibility purposes.
- New sentence clarifies that suppliers cannot remain a voluntary supplier where it meets the domestic customer threshold.

Scheme Gas Suppliers

- New section added entitled 'Scheme Gas Suppliers (SGS)', which defines when a licenced gas supplier qualifies as a specified gas supplier and can spend on behalf of a connected compulsory electricity supplier for Industry Initiatives.



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The Roles of Ofgem, DESNZ and Trustmark.

Ofgem

- Drafting updates to reflect policy changes and to enhance drafting quality and improve clarity of understanding.
- Removal of reference to reconciliation.

DESNZ

- New sentence outlining DESNZ's responsibility to provide the aggregate core spending estimate for each scheme year.
- The Warm Home Discount DESNZ contact email has been updated.

Trustmark

- New sentence added which explains that a certificate of lodgement is required for installations.
- New sentence added which explains that a referral cannot be withdrawn before 31 August following the end of the scheme year.

Chapter 2

The WHD Scheme Estimated Spend Profile

- The aggregate non-core spending for SY16- 20 has been updated.
- Paragraphs 2.2 -2.4 of V2.0 of the guidance have been removed from V3.0 to reflect policy change. The aggregate non-core spending target is set in Regulation 18.

The Core Group Spending Estimate

- Section amended to remove references to Core Group 1 and 2 and associated spending estimates and instead refer to the 'Core Group'.
- Estimated spending for the Core Group for SY16 has been added.

- This section has been revised to reflect policy changes and enhance drafting quality.

Non-Core Spending Obligation

- Section amended to direct the reader to Regulation 18 of the Regulations, which specifies the aggregate value of WHD spending that is attributed to Industry Initiatives.
- Removal of non-core spending obligation adjustment due to no mechanism for SY16 onwards.

Cap on Boiler and Central Heating System Replacements

- This section has been revised to reflect policy changes and enhance drafting quality.

Cap on Debt Write-Off Activities

- This section has been revised to reflect policy changes and enhance drafting quality.

Cap on Financial Assistance with Energy Bills

- This section has been revised to reflect policy changes and enhance drafting quality.

Chapter 3

Determining WHD obligations

- The supplier obligation threshold has been amended to reflect obligation for SY16-20.
- Section amended to specify when the SoS will notify Ofgem of the estimated aggregate core spending obligation for SY16 and subsequent scheme years, and when updates are required.
- Figure 1 amended to provide information on the process for determining obligations for Scheme year 16 - 20.

Customer definition

- New sentences added to provide definition for 'GB domestic customer' and 'Core Group customer'.
- Adjustments for overspend on the non-core obligation, and removal of adjustments relating to SY11 and SY12 as outdated.
- This section has been revised to reflect policy changes and enhance drafting quality.

Adjustments for underspend on the non-core obligation

- Removal of information relating to SY11 and SY12 as outdated.
- This section has been revised to reflect policy changes and enhance drafting quality.

Adjustments for undelivered rebates

- References to Core Group 1 and 2 have been removed and replaced with reference to the Core Group.
- Scheme Year references updated to SY16.
- This section has been revised to reflect policy changes and enhance drafting quality.

Adjustments for non-core additional overspend for Supplier of Last Resort

- This section has been revised to reflect policy changes and enhance drafting quality.
- Removal of references to Core Group as this is now dealt with separately to non-core.

Chapter 4

Supplier Obligations

- References to Core Group 1 and 2 have been removed and replaced with a reference to the Core Group.
- The reference to Pension Credit Guarantee has been removed and replaced with reference to the eligibility statement to reflect the broader eligibility criteria for the Core Group.
- A new sentence has been added to provide further information and clarity on the process for unmatched customers, including how the helpline may assist.
- Paragraph 4.3 of V2.0, which described the data-matching process for Core Group 2, has been removed as it is no longer applicable for SY16 onwards.
- A new paragraph 4.7 has been introduced outlining the provisions for late rebate notices and directing the reader to a new section that explains the late rebate notice process in more detail.
- Paragraph 4.9 has been amended to include information on the late rebate notices process.
- This section has been revised to reflect policy changes and enhance drafting quality.

Market Share Calculations

- Section revised to enhance drafting quality, and to improve clarity on the exact dates that suppliers must take certain actions by.

Rebate Notice

- The section entitled 'Eligibility Notice' in V2.0 of the guidance has been retitled 'Rebate Notice' to align with policy changes. This section explains which individuals rebate notices and late rebate notices apply to.
- Paragraphs 4.19 – 4.20 of V2.0 guidance have been moved. This can now be found in a new paragraph entitled 'Qualifying Date'.
- This section has been revised to reflect policy changes and enhance drafting quality.

Qualifying Date

- A new title, 'Qualifying Date', has been introduced to improve the structure of the guidance. Paragraphs 4.19-4.25 of guidance V2.0, which previously sat under 'Eligibility Notice' heading (now 'Rebate Notice'), have been moved under this heading and reordered for clarity. The substantive content remains broadly unchanged, with some changes to improve drafting quality and clarity.

Core Group Overview

- The titles 'Core Group 1 Overview' and 'Core Group 2 Overview' have been removed to reflect policy changes. They have been replaced with a new section, 'Core Group Overview'. This section provides a summary of which customers are eligible and lists the qualifying benefits for the Core Group.

Customers not provided or delivered with a Core Group rebate

- The title of this section has been amended to reflect the 2026 Regulations.
- The section has been amended to more clearly set out the process suppliers are encouraged to follow to ensure rebates are delivered.

Information to customers identified through automated decision-making

- A new section 'Information to Customers Identified Through Automated Decision-Making' has been included to reflect updated policy and regulatory changes whereby the SoS may direct suppliers to provide additional information to customers in writing before issuing their Core Group rebate.

Supplier Licence termination mid-way through the scheme year

Deletions

- The titles and information contained in the following sections, (which are found at paragraphs 4.33 to 4.44 in the V2.0 Guidance), have been removed from this guidance: 'Low Income Criteria', 'High Energy Cost Criteria', 'Imputation

Methodology' and 'Sweep Up Process'. These deletions reflect policy changes for SY16 onwards, as these sections are no longer applicable.

- Paragraphs 4.48 to 4.102 of the V2.0 Guidance have been deleted from this Guidance as these sections outline the now outdated reconciliation process. All matters relating to Reconciliation will be provided in standalone Guidance.

Chapter 5

The value of the rebate

- Sentence added to provide information about late rebate notices.
- The date following which the SoS may no longer give a rebate notice has been updated for SY20.

Payment methods

- Paragraph 5.5 has been amended to provide greater clarification regarding the rebate for future use, which includes debts on PPM.

Providing and delivering a rebate where the account is not credited directly

- The title of this section has been amended to include 'and delivering' to more accurately describe the purpose of this section.
- The section has been amended to more clearly set out the process suppliers are encouraged to follow to ensure every rebate they provide is delivered, and the procedure that follows where a rebate cannot be delivered by a supplier.
- Figure 3 has been amended to provide information on the timelines for monitoring rebate redemption for Scheme year 16.
- This section has been revised to reflect policy changes and enhance drafting quality.

Late Rebate Notices

- A new section has been added to the chapter entitled 'Late rebate Notices'. This section provides information about what a late rebate notice is, when how it can be issued, and what a supplier must do when it receives a late rebate notice.

Chapter 6 – Industry Initiatives

Industry Initiatives Overview

- References throughout this chapter have been amended to read 'wholly or mainly in fuel poverty or in a fuel poverty risk group' to align with the Regulations.
- Paragraph 6.3 of V2.0 has been deleted.
- Paragraph 6.4 of V2.0, and other references to 'pilot Industry Initiatives' have been deleted. This is because there is no distinction between Industry Initiatives and pilot Industry Initiatives.
- This section has been revised to reflect policy changes and enhance drafting quality.

Permitted Activities

- This section has been amended and updated so that it includes all of the permitted activities for Industry Initiatives as set out in the Regulations, including information about PMM debt build up.

Specified Activities

- This section has been revised to reflect policy changes and enhance drafting quality.

Eligibility Criteria

- Details about ECO4 eligibility routes and LA declarations have been removed and replaced with direct reference to ECO4 guidance.

Interaction with Other Schemes

- This section has been revised to enhance drafting quality and improve clarity of understanding.

Delivery Agents

- The Trustmark lodgement certificate referral withdrawal date has been included in alignment with the Regulations.
- Paragraph 6.49 is updated to include that when a supplier uses a third party then the supplier remains ultimately responsible for meeting its non-core spending obligations.
- A new paragraph is added which explains the notification requirements for multi-supplier industry initiatives.
- This section has been revised to reflect policy changes and enhance drafting quality.

Trustmark

- Section amended to include that a measure that has not been referred (or where a referral which hasn't been withdrawn before 31 August will count for the supplier non-core spending.

Pilot Industry Initiatives

- This section has been deleted. This is because there is no distinction between Industry Initiatives and Pilot Industry Initiatives.

Notification and approval processes

- New sentences have been included to provide further clarity on the exceptions to the general rule that suppliers cannot count spend on Industry Initiative activities toward their non-core spending obligation.
- New sentences have been included to provide further clarity on the determination timeframe, and when further information is requested.
- Information about Pilot Industry Initiatives have been removed.

- This section has been revised to reflect policy changes and enhance drafting quality.

Chapter 7

Reporting

- This section has been revised to enhance drafting quality and improve clarity of understanding.

Initial customer number reporting

- References to scheme years have been amended to refer to scheme years 16-20.

Mid-year customer number reporting

- This section has been deleted as a separate guidance document providing information about reconciliation will be published.

End-of year report

- The additional option for suppliers to upload their completed template to their Huddle area has been included.
- This section now clarifies that suppliers with multiple licences remain individually responsible for meeting obligations for each licence
- This section has been revised to enhance drafting quality and improve clarity of understanding.

Core Group Report

- The title 'Core Group 1 and 2 Report' has been removed to reflect policy changes. This has been replaced with a new section, 'Core Group Report'. This section provides details about what information the Core Group report should contain.

Industry Initiatives reports

- Sentence updated to include multi-supplier initiatives and third-party suppliers under the requirements set out in this section.
- This section has been revised to enhance drafting quality and improve clarity of understanding.

Chapter 8

Fraud and Auditing

Supplier Internal audit requirements

- References to Core Group 1 and 2 have been removed and replaced with reference to the Core Group.
- Sentence has been amended to include reference to late rebate notices.
- The section has been amended to include that where rebates are provided but no delivered, suppliers are encouraged to make multiple attempts to deliver rebates to customers.
- This section has been revised to enhance drafting quality and improve clarity of understanding.

Fraud, misuse and abuse prevention

- References to Core Group 1 and 2 have been removed and replaced with reference to the Core Group.
- This section has been revised to enhance drafting quality and improve clarity of understanding.

2. WHD Guidance: Scotland

Publication date: 8 April 2026

Version number: 3

This version reflects changes to scheme policy signalled in the government response to the [Continuing the Warm Home Discount Scheme consultation](#), and made by the Warm Home Discount Regulations 2026. We have also made general formatting and drafting improvements.

About this guidance

- The scheme years have been updated to SY16–20 in line with the continuation of WHD.
- Reference to the Supplier Obligation threshold has been amended to bring this in line with policy covering SY16-20.
- References to relevant legislation have been updated as required to the new Warm Home Discount (Scotland) Regulations ('the 2026 Regulations').
- Removal of reference to the Warm Home Discount (Reconciliation) Regulations 2022 and amendment regulation text.
- Edited text and new sentences to clarify that version 3.0 does not include information about the reconciliation mechanism as this will be provided in separate guidance.

Useful Links

- Additional link to the 2025 Government Consultation and Government Consultation Response have been included.

Chapter 1

Introduction

- Removal of references to SY 12-15, replaced with references to SY16-20 and associated dates amended to reflect this.

What is the WHD scheme?

- The drafting has been updated to more accurately reflect the groups that suppliers are legally required to support under the 2026 Regulations, replacing previous terminology with language consistent with the regulatory definitions.
- This section has been revised to enhance drafting quality and improve clarity of understanding.

Core Group

- Core Group eligibility has been amended to align with the 2026 Regulations.
- This section has been revised to enhance drafting quality and improve clarity of understanding.

Broader Group

- New sentence added to clarify that current or former Core Group participants cannot be a Broader Group customer.

Industry Initiatives

- The drafting has been updated to more accurately reflect the groups that suppliers are legally required to support under the 2026 Regulations, replacing previous terminology with language consistent with the regulatory definitions.

Fuel Poverty

- The section has been amended to reflect the changes for core group and broader group eligibility as set out in the 2026 Regulations.

Supplier roles and responsibilities

Compulsory Suppliers

- Text amended on compulsory suppliers' obligation threshold to 1,000 and removal of previous threshold which is now outdated.

Voluntary Suppliers

- Minor drafting improvements on voluntary suppliers including amending of 'application' to 'notification'.
- New sentence clarifies that suppliers cannot remain a voluntary supplier where it meets the domestic customer threshold.
- Table 1 amended for accessibility purposes.

Scheme Gas Suppliers (SGS)

- Added section about licensed gas suppliers.

The roles of Ofgem, DESNZ, and TrustMark

Ofgem

- Drafting amendments to reflect policy change and assist with clarity of understanding.
- Removal of information about reconciliation as this information will be provided in separate guidance.

DESNZ

- Further drafting amendments to reflect policy changes and improve drafting quality and clarity.
- The Warm Home Discount DESNZ contact email has been updated.

TrustMark

- New sentence added which explains that a certificate of lodgement is required for installations.
- New sentence added which explains that a referral cannot be withdrawn before 31 August following the end of the scheme year.

Chapter 2

The WHD Scheme Estimated Spend Profile

- The initial overall spending for SY16- 20 has been amended.

The Core Group Spending Estimate

- This section has been amended to reflect the relevant dates as set out in the 2026 regulations.
- A new sentence has been added which clarified when the SoS must update the aggregate core spending estimate.

Calculating Non-Core Spending Obligations

- The text has been amended to explain when the non-core spending obligation is determined for SY16 and for SY17-20 as outlined in the 2026 regulations.

Cap on Industry Initiatives

- This section has been revised to enhance drafting quality and improve clarity of understanding.

Cap on Boiler and Central Heating System Replacements

- This section has been revised to enhance drafting quality and improve clarity of understanding.

Cap on Debt Write-off Activities

- This section has been revised to enhance drafting quality and improve clarity of understanding.

Cap on Financial Assistance with Energy Bills

- A new section has been added which provides information about financial assistance under Industry Initiatives. This is to align with England and Wales guidance.

Chapter 3

Determining WHD obligations

- The supplier obligation threshold has been amended to reflect obligation for SY16-20.
- Section now sets out when the SoS will notify Ofgem of the estimated aggregate core spending obligation for SY16 and subsequent scheme years, and when updates are required.

Customer Definition

- A definition for 'Core Group Customer' has been added.

Market share calculations

- The notification date to Ofgem has been updated as set out in the 2026 Regulations.
- Figure 1 amended to provide information on the process for determining obligations for Scheme year 16 - 20.
- This section has been revised to reflect policy changes and enhance drafting quality.

Adjustments for overspend on the non-core obligation

- Removal of adjustments relating to SY11 and SY12 as outdated.
- This section has been revised to reflect policy changes and enhance drafting quality.

Deletions

- 'Adjustment for increase in non-core spending obligation during SY15' section in V2.0 has been deleted from V3.0 of the guidance.

Chapter 4 - Core Group

- A New table has been added which sets out which benefits qualify under the Core Group and any additional criteria which must be met.
- This section has been revised to reflect policy changes and enhance drafting quality.

Supplier Obligations

- Additional paragraphs have been included which outline the requirement for suppliers to notify matched customers of their eligibility to receive the rebate.
- The section has been amended to more clearly set out that suppliers are encouraged to ensure rebates are delivered.

Information to Customers Identified Through Automated Decision-Making

- A new section 'Information to Customers Identified Through Automated Decision-Making' has been included to reflect updated policy and regulatory changes.

Qualifying date

- Clarified that the qualifying date will be set out in the E&W eligibility statement.
- Added information when a person is in hospital or a hospice.

- Defined what a partner of an eligible person is.

Customers not provided or delivered with a Core Group rebate

- The section has been amended to more clearly set out that suppliers are encouraged to ensure rebates are delivered.
- Have added about late rebate customers to the scenario list.

Supplier Licence termination mid-way through the scheme year

- Sections have been deleted from this Guidance as these sections outline the now outdated reconciliation process. All matters relating to Reconciliation will be provided in standalone Guidance.

5. Broader Group

Broader Group Overview

- Additional wording has been included to clarify that eligibility Broader group are not captured under the Core Group or will wholly or mainly be persons not formally in the Core Group.
- The section has been amended to more clearly set out the process suppliers are encouraged to follow to ensure rebates are delivered.

Eligibility Criteria

Compulsory Broader Group Criteria

- The qualifying benefits for the broader group have been amended to align with the 2026 Regulations.
- The compulsory eligibility criteria which Ofgem must always approve has been amended to reflect the 2026 Regulations.
- This section has been revised to reflect policy changes and enhance drafting quality.

Notification and approval process

- Additional text has been added to clarify the process where Ofgem request further information from a supplier, and the determination timeframe has been paused.
- This section has been revised to enhance drafting quality and improve clarity of understanding.

Amending an Approved Broader Group Notification

- Date and scheme year references have been amended to SY16 onward.

6 – Provision of the Rebate

- Text added to clarify that rebate value provided to the Core Group also applied to late rebate customers.
- References to SY12 have been removed as outdated.

Payment Methods

- This section has been revised to enhance drafting quality and improve clarity of understanding.

Providing and delivery a rebate where the account is not credited directly

- The section heading has been amended to reflect the 2026 Regulations.
- An additional sentence has been added in paragraph 6.17 which provides that the supplier must notify Ofgem of the reasons why any rebates were not provided in its end-of-year report.
- The reference to previous SY have been removed.
- Figure 4 has been updated to provide timelines for monitoring redemption for SY16 onward.

- This section has been updated to improve overall drafting quality and clarity, particularly regarding instances where rebates have been provided but not delivered.

Late Rebate Notices

- A new section has been included which provides guidance on the processes a supplier must follow regarding late rebate notices.

7 – Industry Initiatives

Industry Initiatives Overview

- References to fuel poverty throughout this chapter have been amended to align with the Regulations.
- Further drafting amendments to reflect policy changes and improve drafting quality and clarity.
- Paragraph 7.11 of V2.0, and other references to 'Pilot Industry Initiatives' have been deleted. This is because there is no distinction between Industry Initiatives and Pilot Industry Initiatives.

Permitted Activities

- This section has been amended and updated so that it includes all of the permitted activities for Industry Initiatives as set out in the 2026 Regulations.

Specified Activities

- This section has been revised to enhance drafting quality and improve clarity of understanding.

Eligibility Criteria

- Details about ECO4 eligibility routes and LA declarations have been removed and replaced with direct reference to ECO4 guidance.

TrustMark

- Section amended to include that a measure that has not been referred (or where a referral which hasn't been withdrawn before 31 August will count for the supplier non-core spending.

Pilot Industry Initiatives

- This section has been deleted. This is because there is no distinction between Industry Initiatives and Pilot Industry Initiatives.

Notification and approval process

- New sentences have been included to provide further clarity on the exceptions to the general rule that suppliers cannot count spend on industry initiative activities toward their non-core spending obligation.
- New sentences have been included to provide further clarity on the determination timeframe, and when further information is requested.
- Information about Pilot Industry Initiatives have been removed.
- This section has been revised to enhance drafting quality and improve clarity of understanding.

8 – Reporting

Initial customer number reporting

- The title of this section, which reads 'Scheme year customer number reporting' in V2.0 has been amended.

Deletions

- 'Mid-scheme year customer number reporting section in V2.0 has been removed from V3.0.

Mid-year report: Transfer of Broader Group obligation

- New paragraph at 8.10 has been added to clarify the steps a supplier must take where it is successful in having any broader group obligation transferred to Industry Initiatives.
- This section has been revised to reflect policy changes and enhance drafting quality.

Making a Notification

- This section has been revised to reflect policy changes and enhance drafting quality.

End of Year Report

- References to previous Scheme Years have been removed.
- This section has been updated in line with the 2026 Regulations.

End of Year Reporting Process

- References to previous Scheme Years have been removed.
- This section has been updated in line with the 2026 Regulations.

Core Group Report

Rebates

- The Section has been updated to include information about the process suppliers must follow in relation to late rebate notices and where rebates have not been delivered.
- This section has been revised to reflect policy changes and enhance drafting quality.

Exceptions

- Section has been updated to provide references to the 2026 Regulations.

Final rebate redemption report

- A new section has been added which provides information about the process for final rebate redemption reports.

Broader Group report

Rebates

- This section has been revised to enhance drafting quality and improve clarity of understanding.

Industry Initiative reports

Activities

- Paragraph 8.65 in V2.0 has been removed from V3.0 as this does not accurately reflect the process.

Final Rebate Redemption Report

- This section (8.67 – 8.69 in V2.0) has been removed from V3.0 as this information will be included in the reconciliation guidance.

9 – Fraud and Auditing

Supplier internal audit requirements

- Paragraph 9.9 of V3.0 has been amended to include information about late rebate notices in addition to core group rebates. In addition, wording has been amended regarding 'scheme element: rebate redemption' to clarify that suppliers are encouraged to make multiple attempts to deliver the rebate to customers.



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