



Making a positive difference
for energy consumers

Dear Sir/Madam,

Subject Access Requests (SARs) – change of administrative practice

We are writing to you because your firm has recently submitted SARs, on behalf of your clients, with regards to Cavity Wall Insulation (CWI) claims. You will be aware that our practice, to date, has been to accept your pro-forma Forms of Authority (FOAs) as sufficient evidence that you are acting on behalf of the stated clients. Until now this has given us sufficient assurance to undertake the SAR (which contains personal data) and release the requested information to you.

We have carried out a review of our process when engaging with firms that are pursuing cavity wall claims on behalf of their clients.

Please note, with immediate effect, we will no longer rely on any pro-forma FOA and will not provide a response to any organisation. This includes SARs we are currently in receipt of but are yet to respond to.

Going forward we will write to your client at their home address, providing them with a response to the SAR; they are then at liberty to share the information with you. In practical terms we do not anticipate that this will result in a change to the information that we provide, or its format, but rather a change in the process by which we are content to release this information.

We have implemented this change because our overriding concern is that we have robust procedures in place to protect personal data. Also, from an administrative efficiency perspective, this approach ensures consistency. This approach gives us greater assurance that we are complying with our obligations under the Data Protection Act 1998 and the principles contained in the EU General Data Protection Regulation.

For any SARs you have submitted, but we have not yet provided a response to you, we will write to your clients direct. You may wish to contact your clients to advise them to look out for our communication to them.

Please be advised we intend to publish this as an open letter on our website along with general advice for consumers experiencing concerns with the standard of ECO installations. This advice includes seeking remediation through the installer, guarantee company or the supplier funding the measure.

Should you require any clarity on this please contact us at eco@ofgem.gov.uk.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'D Fletcher', written over two horizontal lines.

David Fletcher

Associate Director
Energy Efficiency and Social Programmes