Guidelines for electronic documents

ECO Reporting Working Group Guide

The documents and data that an obligated energy supplier must be able to make available for the purpose of an audit or other compliance check are set out in Appendix 1 of the <u>ECO2t Guidance</u>: <u>Delivery</u>.

Obligated energy suppliers may capture some of this information electronically.

This document sets out guidelines which will help provide assurance around the quality and reliability of electronic documents. This document supplements the <u>Quality of Documentation Guide</u> which outlines the minimum standards that energy companies have suggested should be followed when completing any ECO documentation.

- 1. Some obligated energy suppliers may request confirmation of which electronic applications or software is being used in the delivery of ECO measures. Please check with the relevant supplier(s).
- 2. The software used to produce electronic documents must not be capable of assigning a customer signature to a document which they have not signed.
- 3. It must not be possible to change the date of documents that were completed electronically.
- 4. 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.
- 5. Signature and signature boxes within documents should be user-friendly and consumers should receive instructions on how to complete these correctly if required.
- 6. Photos taken within or imported to an ECO software tool must be time/date-stamped. All reasonable efforts should be made to GPS-stamp photos, although we understand that sometimes this is not possible.
- Software must ensure that fields and signatures cannot be modified at a later date.
 Where there is a need for modification, documents should be version controlled and a record of any change stored.
- 8. Documents must be saved automatically once completed and a version history of any modifications kept.
- 9. Where customers have signed documents electronically they must have access to documents after any works are completed. This can include paper documents.
- 10. 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 & address/contact details of the consumer can be auto-populated

- 11. All forms may be branded provided the agreed template wording stays the same as the forms on the Ofgem website. If you wish to make changes or additions to any of the forms you must get prior agreement from the obligated energy supplier.
- 12. The software will be updated to ensure that the latest version of the Ofgem and ERWG templates are being used.
- 13. Any person(s) collecting personal data should understand and comply with General Data Protection Regulation (GDPR) and Data Protection Act 2018¹).

Best practice

- The software tool should be backed up centrally to avoid data loss.
- The software tool should be encrypted, ideally to AES 256-bit.
- The software tool should have enforced password complexity requirements, ideally a minimum of 8 characters including a capital and a number.
- The software tool should have the ability for user-accounts to be switched off remotely (e.g. in the event a device is lost / stolen).
- The device should have an auto-lock for times of inactivity.

- The software should take into consideration the duties under the Data Protection Act (1998) and moving forward under the General Data Protection Regulation

¹ https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/