

Energy Company Obligation (ECO)

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2 June 2020

ECO Amidst COVID-19 v2

We appreciate the need for greater clarity and flexibility during this time of uncertainty as a result of the COVID-19 situation. We are continuously working with Government to see how we can expand on current guidance around how businesses operate, particularly where activities involve entering homes and properties.

This updated guidance replaces the previous version published 7 May 2020, accounting for more recent changes in Government guidance. This document is accurate as at 2 June 2020. We expect obligated suppliers and their supply chains to prioritise customer and staff safety, and take timely decisions while delivering their services and following the latest Government advice.

1. General note

1.1. Government and devolved administrations have issued further guidance regarding tradespeople and work carried out in people's homes. Guidance is available for installations completed in [Scotland](#), [England](#) and [Wales](#).

1.2. In England, non-essential work can now be carried out where it can be undertaken safely, with the exception of households which are isolating or shielding. Tradespeople should follow the [guidance for working in people's homes](#), including undertaking a risk assessment and making every reasonable effort to comply with the social distancing guidelines. No work should be carried out in a household which is isolating because one or more family members has symptoms or where an individual has been advised to shield - unless it is to remedy a direct risk to the safety of the household.

1.3. The above applies in England only. People working in Scotland and Wales should refer to equivalent guidance issued by devolved administrations. See [guidance for working in Scotland](#) and [guidance for working in Wales](#). Employers should follow all guidance and comply with relevant legislation in Scotland and Wales.

1.4. Both obligated energy suppliers and ECO supply chains should work with each other to understand whether it is possible for any activity to continue whilst meeting the requirements set out in the above Government guidance. Work should only be considered where access to the property has been confirmed by the homeowner in advance and all activities must adhere to the latest Government guidance relevant in Scotland, England and Wales.

1.5. It remains vital to avoid poor quality installations which may lead to further issues, and we therefore continue to expect remediation and some level of monitoring to continue where it does not conflict with the latest Government guidance (and as per the below section 'Monitoring'). Any concerns about not being able to meet the monitoring requirements on time should be directed via the energy suppliers to us as soon as possible.

1.6. This document is accurate as at 2 June 2020. It is possible that the guidance referenced above will continue to change and we would encourage all stakeholders to keep up to date with the latest guidance for Scotland, England and Wales, as new guidance may overrule aspects of this current information.

1.7. It is worth noting that where a deadline is explicit in legislation ([ECO3 Order](#) and [ECO3.1 Order](#)), we do not have the ability to provide flexibility or change legislative deadlines. We have also been advised that due to the current circumstances, Parliament and Government does not have the capacity to make changes to the current ECO legislation in the short term.

1.8. We are continuing to monitor current delivery towards obligation targets and are engaging with BEIS to keep them apprised.

1.9. We are continuing to administer all back-office ECO processes in order to ensure that scheme requirements are met and consumer protections maintained. However we will keep all processes under review in light of any newly emerging priorities, resource pressures, or change in circumstances.

2. Signing Documentation

2.1. We have had a number of queries relating to the completion of installation paperwork over the coming weeks. There are concerns around the use of signatures, either with a pen or a stylus, and there being delays in obtaining paperwork due to homeowners potentially being in isolation at the point handover would normally happen.

2.2. We appreciate the installation process of measures may be disrupted due to the ongoing situation and the actions being taken to minimise the spread of COVID-19. Installers and energy suppliers should not be carrying out any activities that go against the latest Government guidance for Scotland, England and Wales.

- 2.3. We also, however, need to maintain assurance that installation work is still being completed properly and to the appropriate standards, and that an effective handover is completed to the customer's satisfaction. We are particularly concerned about the need to ensure that appropriate warranties / guarantees are not invalidated by the lack of physical signatures.
- 2.4. We will not be removing the requirement to issue and / or collect any of the documentation usually required under ECO. Records for all relevant documentation should be retained.
- 2.5. Where it is possible to do so in line with the relevant Government guidance, physical signatures should be obtained from the relevant individual. Where this is not possible, we have outlined below some alternative options that we will accept. Please note that these alternatives apply until we specify otherwise.
- 2.6. Email confirmation from the relevant individual that confirms they have read and understand the relevant documentation, and endorse the content, will now be accepted. We have provided specific wording that should be used where an email declaration is relied upon. More detail is provided at Annex 1.
- 2.7. Records of all email declarations should be retained by suppliers. We strongly advise that for official bodies, where possible, an official email address is used rather than one of an individual. For homeowners and landlords we appreciate this may not be possible.
- 2.8. Where email isn't an option, we are content for suppliers to accept recorded phone calls to the relevant individual as confirmation of their receipt and endorsement of documentation. The documentation should be posted to them initially and explained to them over the phone. Their verbal agreement will act as confirmation. Such phone calls will need to have metadata attached that includes the phone number of the individual so that their identity and property can be verified.
- 2.9. If neither of the above are possible, we are also open to other proposals not already mentioned. Please contact us with any such proposal.
- 2.10. Once we are satisfied all other options have been explored, we will allow an extension to the four calendar week period between installation and handover that is normally considered the maximum appropriate time.
- 2.11. It should be observed that in any case, all relevant paperwork should be provided to the homeowner (by posting through the letterbox if necessary) regardless of whether a signature can be obtained or not.

3. The Deemed Score Survey (DSSY)

3.1. This document is used to determine the deemed score a measure would deliver. The expectation from Ofgem is that this document be completed by someone who is suitably qualified. It is for suppliers to determine for themselves, however, what constitutes suitably qualified. From our understanding a Domestic Energy Assessor (DEA) might be one example of a suitably qualified individual.

3.2. Given the new constraints around installation and the difficulty that might cause for, for example, a DEA accessing a property, we confirm that an installer completing this document prior to installation would be enough to satisfy our requirements.

3.3. It's important to note that it is still for the supplier to make this determination for themselves.

4. Gas Safe

4.1. We understand that some Nationally Accredited Certification Scheme for Gas Fitting Operatives assessment centres are not currently open. This may make it difficult for engineers to renew their qualifications should they be due to expire during the lockdown restrictions. On this scenario, have regard as required to Gas Safe's COVID-19 Advice and Guidance. If Gas Safe are content for an engineer to remain on their register, this would continue to satisfy our related requirements.

5. Monitoring

5.1. Installation can continue where possible and in line with the relevant Government guidance for Scotland, England and Wales. It is imperative, however, that industry continues to maintain standards of installation and that customer protection remains at the forefront of the installation process. We see monitoring as integral to achieving this and therefore still expect it to go ahead where it can be done so in line with Government guidance.

5.2. Onsite inspections remain the optimal method for conducting monitoring and should be attempted wherever it is possible to do so in line with the relevant Government guidance.

5.3. As we recognise there will be instances where visits to a household cannot take place during lockdown restrictions, we have developed guidance with ATMA which will allow for technical monitoring inspections to be conducted remotely. This includes both the use of time and geo-stamped photographs to demonstrate compliance retrospectively, and the use of video facilities to conduct a live inspection. This should allow inspections to be conducted at both the mid-installation and the post-installation stage even where physical access to the property is not possible.

5.4. Where possible ATMA have developed evidential requirements that use evidence already collected as standard and that would allow supply chains to use existing systems. Please be aware, however, that this may not always be possible.

5.5. The [ATMA guide to members undertaking 'remote' Technical Monitoring Inspections amidst COVID-19 restrictions](#) will need to be followed wherever a remote inspection is conducted. This guidance can be applied to any previous monitoring quarter and will remain relevant for the duration of any lockdown or social distancing periods, and until we specify otherwise.

5.6. For Quarters 1 to 6, where it is not possible to carry out a physical inspection in line with the relevant Government guidance, we will accept remote inspections conducted using the ATMA guidance as part of any Core Monitoring or Additional Monitoring requirement for as long as the ATMA guidance remains relevant. All evidence must meet ATMA's criteria.

5.7. Every effort should also be made to ensure photographic evidence is both time and geo-stamped. Any inspections where the photographic evidence does not have this information available will be treated as neutral inspections and will not count towards the relevant monitoring requirement. The deadline for providing information relating to these pathways to compliance (Core Monitoring, Responses to Fails, Additional Monitoring, Additional Assurance) has been extended to 31 July 2020.

5.8. For Quarter 7 where it is not possible to carry out a physical inspection in line with the relevant Government guidance, we will accept remote inspections conducted using the ATMA guidance as part of any Core Monitoring or Additional Monitoring requirement, for as long as the ATMA guidance remains relevant. All evidence must meet the ATMA criteria.

5.9. For remote inspections conducted on Quarter 7 measures installed up until and including 5 June 2020, every effort should be made to ensure photographic evidence is both time and geo-stamped. For now, any inspections conducted on measures installed before this date where the photographic evidence does not have this information available, will be treated as neutral inspections and will not count towards the relevant monitoring requirement. Evidence collected for measures installed from 6 June 2020 must be both time and geo-stamped.

5.10. Suppliers are not required to conduct remote inspections if they do not wish. It should be understood, however, that the monitoring requirements for all quarters remain the same. Should suppliers be unable to meet those requirements, having made no attempt to conduct remote inspections, we are likely to be less sympathetic.

5.11. Given remote inspections on this scale and breadth are a new development, we intend only to permit them where a physical inspection cannot be carried out in line with the relevant Government guidance, and where any lockdown or social distancing restrictions continue to

apply. We will, however, remain in close contact with ATMA and suppliers throughout this period to determine the level of assurance they're getting from remote inspections. Based on this we will decide firstly whether follow-up on-site inspections of some level may be necessary once restrictions are lifted, and secondly whether it would be appropriate to permit these remote inspections in the longer term.

5.12. For score monitoring, we understand it's much more difficult to determine key aspects of the installation in order to perform an accurate assessment. We are therefore content to delay the score monitoring requirement until on-site inspections become possible. At that point in time monitoring will need to be conducted on those measures being installed now in order to meet the current relevant monitoring requirements. This will be in addition to any monitoring needing to be conducted in order to meet any contemporaneous requirements.

5.13. Should we determine at any point that remote inspections might be able to accurately verify the score of a measure, we may introduce such inspections for score monitoring sooner.

Annex 1

This annex outlines the process that should be followed where email confirmation is employed to demonstrate handover of a measure to a homeowner.

Email handover occurring from 7 May 2020 to 5 June 2020

In these instances email confirmation from the eligible householder should include the following:

- Identification of the householder.
- Identification of the address.
- Reference to the specific documents the householder has been provided with.
 - This list of documents should include any that would form part of the normal handover.
- Confirmation the householder understands and agrees with the documentation.

The email should be from the householder's personal email address if they do not represent an official body, so that the individual can be identified. For official bodies an official email address should be used rather than a personal email address.

Email declarations from householders must be provided as attachments rather than having been forwarded on and records of all email declarations must be retained by suppliers.

Email handover occurring from 6 June 2020

From the date this guidance is published, we require that a completed version of the ECO3 Declaration of Conformity and Completed Installation (DOCC) is emailed to the householder. It does not need to have been signed by the householder.

The householder must respond to the installer with the DOCC attached and the following wording in the body of the email.

*I **<insert name>** at **<insert address>** confirm that all applicable statements within the "Customer Declaration" section of the attached document "ECO3 Declaration of Conformity and Completed Installation" are true and that a guarantee for the work, which meets all relevant ECO3 requirements, has been provided or will be issued to me shortly.*

The email should be from the householder's personal email address if they do not represent an official body, so that the individual can be identified. For official bodies an official email address should be used rather than a personal email address.

Email declarations from householders must be provided as attachments rather than having been forwarded on and records of all email declarations must be retained by suppliers.