

ECO4 and GBIS Flex Local Authority Guidance

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This document provides guidance for Local Authorities and Devolved Administrations who wish to participate in the Energy Company Obligation schemes:

- ECO4, and/or
- the Great British Insulation Scheme (GBIS)

It outlines how Local Authorities and Devolved Administrations can identify and refer households to suppliers, installers or managing agents under GBIS and ECO4 flexible eligibility ("Flex") routes. This guidance includes information on:

- submitting Statements of Intent,
- the different Flex routes,
- sharing Declarations and Declaration Notifications,
- evidencing eligible households, and
- our auditing process.

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Introduction

1. Context

- 1.1. ECO4 and the Great British Insulation Scheme (GBIS) place legal obligations on energy suppliers to deliver insulation and heating measures to homes, and aim to reduce home heating costs for fuel poor households.
- 1.2. For ECO4, the Scheme's obligation period runs from 27 July 2022 to 31 March 2026.
- 1.3. For GBIS, the Scheme's obligation period is split into three phases:
 - **Phase A:** 25 July 2023 to 31 March 2024
 - **Phase B:** 1 April 2024 to 31 March 2025
 - **Phase C:** 1 April 2025 to 31 March 2026
- 1.4. For more information about the schemes, visit our website:
 - [Energy Company Obligation \(ECO4\)](#)
 - [Great British Insulation Scheme \(GBIS\)](#)

Flexible Eligibility

- 1.5. The Flexible Eligibility (Flex) component of ECO4 and GBIS allows Local Authorities (LAs) to identify and refer consumers that live in private tenure properties and are considered low-income, fuel poor, or vulnerable to the effects of living in a cold home.
- 1.6. Flex is intended to utilise LAs localised and communal knowledge to target consumers that may benefit from the scheme, but who may not be captured within the scheme's standard eligibility criteria.
- 1.7. To make a "referral" for the scheme, LAs are able to share Declarations (see [Section 10: Issuing Declarations](#)) with suppliers to notify them of consumers eligible for ECO4 or GBIS measures.
- 1.8. Suppliers must then determine which projects to take forward. For projects that are pursued, suppliers will determine which measures properties are suitable to receive, and ensure the installation of measures is completed.

- 1.9. LAs must also share a Declaration Notification (see [Section 11: Submitting Declaration Notifications](#)) with us to notify of any households referred.
- 1.10. All LAs in England, Wales or Scotland are able to make referrals through Flex. LAs can refer households within their own area, and for other areas for whom they have been given delegated authority (see 3.16). Devolved Administrations (the Welsh and Scottish Governments) are also able to refer households to suppliers.
- 1.11. Throughout this document, we will refer to LAs as all authorities that are able to make referrals via Flex.
- 1.12. Flex remains optional for LAs, and LAs can opt to take part in Flex by publishing a Statement of Intent (SoI) (see [Section 3: Publishing an SoI](#)) on their website.

Updates to this document

Throughout the document

- Amendments to text and formatting to improve readability and accessibility.
- Restructuring of chapters and sections to minimise repetition.
- Updates to incorrect or out-of-date weblinks or naming conventions.
- Replacements of footnotes with weblinks, where possible.

Route 1: Household Income

- Interpretation of "gross annual income" added for Route 1: Household Income.
- Information regarding evidencing expanded to support interpretation for Route 1: Household Income.

Route 3: Medical Referrals

- Interpretation of "relevant health provider" added for Route 3: Medical Referrals.

Submitting Declaration Notifications

- Language updated to reflect umbrella conditions no longer needing to be specified to Ofgem for Route 3 referrals.
- Information added on data sharing.
- Information added on interaction with other schemes.

Audits

- Language amended to improve accuracy.

Appendix

- Update to Flowchart of GBIS and ECO4 Flex Process.

Contacts

If you have a question for us that is not answered in this guidance, please email:

- eco@ofgem.gov.uk for questions that relate to ECO4
- GBIS.enquiry@ofgem.gov.uk for questions that relate to GBIS

To contact an ECO obligated supplier, visit [ECO Supplier Contact Details](#).

Forms and Subsidiary Documents

- [Great British Insulation Scheme and ECO4 LA and Supplier Flex Forms and Subsidiary Documents](#)
- [ECO4 Flexible Route 4 Bespoke Targeting Guidance](#)

Legislation

- [The Electricity and Gas \(Energy Company Obligation\) \(ECO4\) Order 2022](#)
- [The Electricity and Gas \(Energy Company Obligation\) \(ECO4A\) Order 2023](#)

Guidance for Supply Chain

- [Great British Insulation Scheme Delivery Guidance](#)
- [ECO4 Delivery Guidance](#)

Relevant Consultations

- [Design of the Energy Company Obligation \(ECO4: 2022-2026\) Government Response](#)
- [Design of the Energy Company Obligation \(Great British Insulation Scheme: 2023 – 2026\) Government Response](#)
- [Ofgem ECO4 Administration Consultation Part 1](#)
- [Ofgem ECO4 Administration Consultation Part 2](#)

2. Roles and Responsibilities

Local Authorities

- 2.1. Once an LA has signed and published a Statement of Intent (SoI), they are able to:
- identify eligible consumers in their own and other areas, where they have been given delegated authority.
 - produce declarations to suppliers or installers for all identified households.
 - sign a Data Sharing Agreement (DSA) and submit declaration notifications to us for all identified households.
- 2.2. LAs must collect evidence and retain proof of eligibility for up to 3 years following the end of the scheme.

Suppliers and Installers

- 2.3. Key responsibilities for suppliers and installers include:
- ensuring that all installers are TrustMark registered and comply with PAS¹ and MCS standards².
 - confirming whether a property is eligible via a SAP or RdSAP assessment.
 - determination of which of the schemes is most suitable for a consumer's property, if eligible, and which measures are appropriate for install.
 - notifying us of the measure(s) agreed upon and installed within a property.
 - ensuring that scheme obligations are met, and that measures installed under GBIS Flex are delivered in line with the low-income minimum requirement.
 - using their own energy debt data to identify and refer eligible customers via Supplier Flex.
 - ensuring they have access to evidence collected to determine eligibility.
 - retaining evidence for eligible customers referred via Supplier Flex.

¹ PAS 2035:2019 covers the whole life cycle of a retrofit project, from the initial engagement with a client, through the assessment, design, installation and subsequent evaluation and monitoring stages.

² MCS is a standards organisation, creating and maintaining standards for the certification of low-carbon energy technologies, installers, and their installations. MCS certified installers are required to follow standards that ensure good performance and that installers are technically safe and competent.

Ofgem

2.4. We, Ofgem, administer ECO4 and GBIS and produce guidance for scheme participants. We are also responsible for:

- checking declaration notifications from LAs against supplier notifications.
- conducting supplier and LA audits.
- determining whether a supplier has achieved its obligations.

The Department for Energy Security and Net Zero (DESNZ)

2.5. DESNZ is responsible for:

- setting the scheme's policy and legislation.
- review and approval of Flex Route 4 proposals.

Trustmark

2.6. TrustMark is responsible for ensuring installers comply with the PAS 2035 retrofit project standard³. Measures installed according to PAS or MCS must be installed by, or under the responsibility of, a person who is registered with TrustMark for the purposes of that measure.

2.7. For measures not referred to in PAS or under MCS, such as some data light measures (DLMs) and innovation measures (IMs), installation must be subject to arrangements for quality assurance and consumer protection, including installation standards and arrangements for repairs and other remedies, which are equivalent to what TrustMark requires.

2.8. Trustmark are the point of contact if consumers have issues with the:

- installation process
- installer
- MCS or PAS certificate or product

³ [PAS 2035](#) covers the life cycle of a retrofit project, 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. PAS 2035 encapsulates the PAS 2030 and MCS standards.

2.9. Further information on [TrustMark](#) can be found in their Consumer Charter and Code of Conduct.

Working with other stakeholders

2.10. There are a number of potential delivery models that could be followed under Flex, and it is up to LAs and suppliers to agree them.

2.11. A supplier must provide information to us on measures delivered under the schemes and, as such, the suppliers will require information from the LA to support this, including access to evidence of eligibility that they have collected.

2.12. Suppliers, installers, and LAs are free and encouraged to establish their own working relationships. Neither we nor DESNZ have formal processes in place for this.

2.13. LAs should make it clear to consumers that their inclusion in a declaration does not guarantee measures will be installed. In deciding to install measures, a supplier may depend on:

- whether a property meets SAP band eligibility criteria
- a survey carried out by suppliers, or their agents or contractors, and the subsequent installation costs calculated
- the energy savings that can be achieved for a property
- whether suppliers have achieved, or are close to achieving, their targets
- other commercial considerations

2.14. Consumers should be made aware that suppliers will carry out an assessment to decide which measure(s) their property should receive.

Statement of Intent (SoI)

3. Publishing an SoI

- 3.1. A Statement of Intent (SoI) publicises the criteria that an LA will use to identify eligible consumers via Flex. This ensures transparency and public accountability in relation to the eligibility criteria that the LA will use, and advertises the LA's participation in Flex.
- 3.2. A template [Statement of Intent for ECO4 and GBIS](#) can be found on our website.
- 3.3. The SoI should be uploaded to the LA's website, once completed.
- 3.4. An LA must publish an SoI before they can make declarations for eligible consumers (see [Section 10: Issuing Declarations](#)). LAs must use the most recent version of the SoI when making declarations.
- 3.5. If the SoI is found to be incorrect, published after a declaration was made, or not published at all, we may take compliance action against projects or measures included in relevant declarations.
- 3.6. [Figure 1](#) provides a step-by-step walkthrough of the Flex process, including the publication of an SoI.

What should an SoI include?

- 3.7. An SoI must contain the following information:
 - Name of the LA
 - Name of LAs who have delegated authority
 - Date of publication
 - Version number
 - A statement that the LA accepts that declared consumers must be eligible via at least one of the four Flex routes (see [Section 4: Household Eligibility Requirements](#)).
 - Where the LA wishes to use Route 2 Proxy 5 (see 6.16), the name and the description of the scheme must be stated in the SoI. The description will need to

include which cohort of people the LA-run scheme is helping, and how they identify consumers as low-income or vulnerable for the purposes of NICE Guideline.

- 3.8. LAs should use the tick boxes provided in the SoI to indicate which eligibility routes and proxies they will use (see [Section 4: Eligibility Requirements](#)). Routes and proxies should not be removed from the SoI template, even if not in use.
- 3.9. An SoI should be signed by either the LA's CEO or nominated responsible person. An SoI cannot be signed by a third party working for, or on behalf of, an LA.
- 3.10. A wet signature on the published version is not a legal requirement. However, we urge LAs to provide either a wet or electronic signature or, as a minimum, a printed name, along with a point of contact. Signatures must not be auto-populated or duplicated.
- 3.11. An SoI must not reference schemes other than ECO4 and GBIS.

Versioning

- 3.12. Following the launch of GBIS, our [SoI template](#) now covers both ECO4 and GBIS Flex. If an LA has:
 - already published an SoI for ECO4 Flex using a previous template, and does not wish to participate in GBIS Flex, they do not need to update their SoI using the combined template.
 - already published an SoI for ECO4 Flex using a previous template, and does wish to participate within GBIS Flex, they do need to update their SoI using the combined template.
 - not yet published an SoI for either scheme, they will need to use the combined template.
- 3.13. If a change is made to an SoI, the most up-to-date template available should be used. Version numbers should also be included when an SoI is updated to make it clear when changes have been made.
- 3.14. We may publish updated SoI templates, however, we do not expect LAs to publish a new SoI on their website when an updated template is published.
- 3.15. Previous versions of the SoI should remain publicly available but clearly marked as 'superseded' or 'withdrawn', alongside the date on which the action was taken. This is

to ensure that declarations submitted under previous SoI versions can be assessed and matched correctly.

Joint SoIs

- 3.16. An LA can delegate authority to another LA to provide declarations for consumers in its area. This needs to be stated in the SoI of the LA to whom authority has been delegated. Where an LA delegates authority to another LA, we suggest the delegating LA also publishes an SoI on its website.

Identifying and Evidencing Eligible Households

4. Eligibility Requirements

4.1. Eligibility for Flex consists of two elements:

- **Household eligibility:** This refers to whether a members of a household meet the eligibility criteria for one of the four Flex routes.
- **Property SAP Band eligibility:** This refers to whether a property itself meets the route-and tenure-specific SAP band eligibility criteria.

Household Eligibility

4.2. There are four eligibility routes that can be used to refer fuel-poor and vulnerable consumers under Flex:

- [Route 1: Household Income](#)
- [Route 2: Proxy Targeting](#)
- [Route 3: Medical Referrals](#)
- [Route 4: Bespoke Targeting](#) (**applicable to ECO4 Flex only**)

4.3. An LA can use any of these routes to refer eligible consumers. Each route must be used independently.

4.4. Where an LA refers a member of a household, an LA officer must collect evidence to demonstrate eligibility (see 4.10).

4.5. Measures delivered through Flex must be delivered to private domestic premises (i.e. owner-occupied or private rented sector households). Domestic premises owned or let by a social landlord are not eligible for Flex⁴.

⁴ For more information on the definition of a social landlord, see Schedule 2 of the [ECO4 Order](#).

SAP Band Eligibility

- 4.6. Each property receiving measures through ECO4 or GBIS will undergo either a [Standard Assessment Procedure \(SAP\)](#) or [Reduced Standard Assessment Procedure \(RdSAP\)](#) prior to the measures being installed. SAP and RdSAP assessments are used to determine the property's SAP band, which indicates the energy efficiency capacity of a property.
- 4.7. Properties must meet route-and tenure-specific SAP band eligibility criteria to receive measures via Flex. Below, Table 1 provides an overview of eligible SAP bands and tenure types for each ECO4 and GBIS Flex Route.

Table 1: Overview of Eligible SAP bands and Tenure Types for Flex Routes

ECO4		
Route	Eligible SAP Bands	Eligible Tenure Type
Route 1, 3 & 4	D to G	Owner-occupied
	E to G	Private rented sector (PRS)
Route 2	E to G	Owner-occupied
	E to G	Private rented sector (PRS)

GBIS		
Route	Eligible SAP Bands	Eligible Tenure Type
Route 1 & 3	D to G	Owner-occupied
	D, E (including F and G if exempt from MEES*)	Private rented sector (PRS)
Route 2	E to G	Owner-occupied
	E (including F and G if exempt from MEES)	Private rented sector (PRS)
Route 4	N/A	N/A

*MEES = [Minimum Level of Energy Efficiency Standard](#)

4.8. 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).

4.9. Consumers should be informed that a SAP or RdSAP assessment will need to be carried out within their home, and that their eligibility for the scheme may be impacted by the outcome of this assessment.

Evidencing Requirements

4.10. We expect LAs to collect and retain evidence of eligibility for all consumers for whom they make a declaration. Suppliers are responsible for ensuring that they have access to this evidence, and that they collect and retain these declarations.

4.11. LAs must collect evidence and retain proof of consumer eligibility for up to 3 years following the end of the scheme.

4.12. We will not collect this evidence, but we may request it from suppliers where issues arise with projects or measures, for example, due to a mismatch (see 11.22) or during audits (see [Section 9: Audits](#)).

4.13. We may request declarations and any evidence to support the eligibility route up to three years after the Final Determination of the schemes, as per the wider data retention policies in ECO4 and Great British Insulation Scheme⁵.

4.14. Where suppliers are not able to provide sufficient evidence when requested, we would be minded to reject the project or measure.

⁵ Further information can be found in the [ECO4](#) and [GBIS](#) Privacy Notices.

5. Route 1: Household Income

Eligibility

- 5.1. 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.
- 5.2. 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.
- 5.3. We make the following interpretations of income: Gross annual income is all money that the members of a household regularly⁶ earn and receive before taxes and other deductions, where applicable.
- 5.4. 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)
- 5.5. 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)
 - 25% tax-free pension lump sum payments
 - Student loans or grants

⁶ Regular earnings refer to payments received on a recurring basis i.e., weekly, monthly, annually.

- Transfer of money between one's own 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)

Evidencing

5.6. All relevant income sources included in a household's gross annual income should be evidenced. Suitable evidence types for this 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

5.7. Confirmation should also be provided for the number of adult residents at the address. Suitable evidence types for this include:

- Council tax letters
- Tenancy agreements
- Mortgage statements
- Electoral register statements
- A combination of the following which demonstrate matching addresses for recipients:
 - Utility bills
 - Benefit letters
 - Financial statements
 - HMRC or DWP letters

- GP or Dental registration letters

- 5.8. These lists are not exhaustive and other evidence types can be used if the sources listed above are unavailable.
- 5.9. 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.
- 5.10. A self-declaration given by a member of the household cannot be relied upon as standalone evidence of gross annual income.
- 5.11. 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.
- 5.12. If no evidence is available from this period, we recommend using the most recent evidence available from before this time period.

6. Route 2: Proxy Targeting

Eligibility

- 6.1. Households that meet **at least two** of the proxies listed below are eligible via Flex Route 2. The following proxy combinations **cannot** be used:
- Proxy 1 with Proxy 3.
 - Proxy 7 with Proxy 5 or 6.

Proxy 1

- 6.2. Proxy 1 refers to consumers living in a Lower Layer Super Output Area (LSOA) within one of the following Indices of Multiple Deprivation:
- **England:** An area identified as a LSOA in the first, second or third decile on the [Index of Multiple Deprivation for 2019](#)⁷.

⁷ These deciles can be found in "File 7: all ranks, deciles and scores for the indices of deprivation, and population denominators".

- **Wales:** An area identified as a LSOA in the first, second or third decile on the [Welsh Index of Multiple Deprivation 2019](#).
- **Scotland:** A “data zone” which is identified as being in the first, second or third decile on the [Index of Multiple Deprivation for 2020](#).

6.3. To evidence this, a screenshot from the LA confirming the consumer’s property is situated within an eligible LSOA area can be used, supported by [Office for National Statistics \(ONS\) data](#).

Proxy 2

6.4. Proxy 2 refers to consumers that are entitled to a Council Tax reduction on the grounds of low-income.

6.5. This does not include a Council Tax Single Person Discount.

6.6. To evidence this, suitable evidence types include:

- a copy of council tax bill featuring the reduction (i.e. a photo, email, or PDF with name and address)
- a letter confirming reduction from LA.

Proxy 3

6.7. 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.

6.8. To evidence this, suitable evidence types are:

- A signed referral letter from a doctor, GP, or other relevant health professional, shared from a valid NHS email address
- Or at least one of the following evidence types:
 - An NHS Summary Care Record that states the patient suffers from, or receives medication for, a health condition listed in the NICE guidance. This must be authenticated by a GP practice stamp.
 - For those with cardiovascular or respiratory conditions:

- Hospital diagnosis letters
- Social worker referral letters
- Copies of repeat prescriptions
- Copies of referral letters to groups that help people with these conditions.
- For those with a disability:
 - Personal Independence Payment (PIP) award notice
 - Disability Living Allowance (DLA) award notice
 - Attendance Allowance award notice
- For those aged 65 or above:
 - Passport
 - Birth certificate
 - Copy of bus pass
 - Pension statement
- For households with young children (aged 5 or under):
 - Child's passport
 - Child's birth certificate
- For pregnancy, a MAT B1 form which demonstrates proof of pregnancy on the date that the LA signed the declaration.

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

6.10. To ensure compliance standards are met, we recommend that the evidence provided is a combination of different types of documents, where possible.

6.11. 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.

- 6.12. If no evidence is available from this period, we recommend using the most recent evidence available from before this time period.
- 6.13. In recognition of health professional's time and effort, and to reduce administrative burden, we have published a [GBIS and ECO4 Flex NHS Referral Letter Template](#) on our website. The health provider can use their own letter template, if preferable.

Proxy 4

- 6.14. Proxy 4 refers to a household with a child that is eligible for free school meals on the grounds of low income⁸.
- 6.15. Suitable evidence for this includes [Eligibility Checking Service \(ECS\)](#) documentation showing eligibility for free school meals due to low-income provided by the Department for Education or the child's school.

Proxy 5

- 6.16. 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](#).
- 6.17. This scheme must be named and described within the LAs SoI, and LAs must provide the name and a short description of the scheme they wish to use.
- 6.18. An LA officer is responsible for checking and verifying associated evidence submitted to them before issuing a declaration. A third party cannot issue declarations on behalf of an LA.
- 6.19. Suitable evidence for this includes a signed letter from either the scheme coordinator or the LA, which verifies the consumer's eligibility for the nominated scheme.

⁸ 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](#).

Proxy 6

- 6.20. 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](#).
- 6.21. The referee organisation does not need to identify a second proxy for which the consumer is eligible.
- 6.22. The referee organisation must provide a signed referral letter to the LA confirming the consumer they have identified. An [ECO4 and GBIS Flex Citizens Advice Referral Letter Template](#) can be found on our website.
- 6.23. Suitable evidence for this includes the signed referral letter, accompanied by proof of gas and / or electricity debt.

Proxy 7

- 6.24. Proxy 7 refers to consumers identified through energy supplier debt data. This route enables obligated suppliers to use their own debt data to identify either:
- **Non-Pre-Payment Meter customers:** These are customers who have both:
 - been in debt for more than 13 weeks, ending with the day on which the declaration is made, **and**
 - are in a debt repayment plan with their energy supplier, or repaying their fuel debt through third party deductions.
 - **Pre-Payment Meter customers:** These are customers who have either:
 - self-disconnected or are in receipt of supplier Discretionary or Friendly credit within the last 13 weeks ending with the day on which the declaration is made, **or**
 - a debt repayment plan with their energy supplier or are repaying their fuel debt through third party deductions.
- 6.25. Where a consumer has been referred to the LA for support by their energy supplier using debt data elements, a supplier is able to sign the Declaration under Supplier Flex, so long as the second proxy in use is not Proxy 5 or 6.
- 6.26. This proxy can only be combined with one of proxies 1-4.

- 6.27. Suppliers can also refer customers directly to us based on their own debt data, independent from the LA. They will need to evidence this through their own Project or Measure Notification. They will also need to evidence that the customer's household meets one of proxies 1-4.

7. Route 3: Medical Referrals

Eligibility

- 7.1. 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.
- 7.2. The person's severe or long-term health condition must be due to:
- A cardiovascular condition
 - A respiratory disease
 - Limited mobility
 - Immunosuppression
- 7.3. The LA must provide a declaration certifying that it has received a referral from one of the following:
- A person registered in the General Practitioner (GP) Register
 - A Scottish Health Board
 - A Welsh Health Board
 - An NHS Foundation Trust
 - An NHS Trust

Evidencing

- 7.4. To evidence that a referral has been made, a declaration must be provided by a relevant healthcare provider.
- 7.5. A relevant healthcare provider refers to:
- **A person listed in the General Practitioner Register:** This includes any GP employed in an NHS or private practice.

- **An employee of an NHS Trust or NHS Foundation Trust:** This includes health practitioners working within a hospital or clinic owned by an NHS Trust or NHS Foundation Trust⁹.
- **An employee of an NHS Health Board**

7.6. A [GBIS and ECO4 Flex NHS Referral Letter Template](#) is available on our website. Health providers can use their own letter template if they prefer.

7.7. This declaration can be provided via either:

- **An email** shared directly from a valid NHS email address by the relevant healthcare provider
- **A letter** which is:
 - Printed on headed paper, indicating the practice, clinic or hospital making the referral, and
 - Authenticated with a GP surgery stamp (where relevant)

7.8. The declaration must state that the relevant healthcare provider signing the letter considers someone in the household to be suffering from one of the four health conditions listed in paragraph 7.2, and that the health of the person is adversely affected by living in a cold home.

8. Route 4: Bespoke Targeting

8.1. Route 4 provides the opportunity for LAs to propose new methods for identifying low-income and vulnerable consumers.

8.2. Route 4 is available through **ECO4 Flex only**.

8.3. An application must be submitted to the Department of Energy Security and Net Zero (DESNZ) and needs to demonstrate that:

- i) The proposed methodology is more effective at identifying fuel poor consumers than the criterion offered in Routes 1 and 2,

⁹ A directory of all NHS Trusts and NHS Foundation Trusts can be found [here](#).

ii) More than 50% of the premises that meet the criteria are not in receipt of the following benefits:

- 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

iii) And at least either:

- a. 75% of the premises that meet the criteria are owner-occupied premises occupied by at least one person living in fuel poverty; or
- b. 90% of the premises that meet the criteria are private rented premises occupied by at least one person living in fuel poverty.

8.4. To submit an application, LAs should share an [application form](#) with ecoteam@energysecurity.gov.uk for assessment and approval.

8.5. Once DESNZ has approved an application, a reference number will be provided. This should be notified to us for all relevant projects. The 10% uplift is only awarded subject to all criteria and minimum requirement rules being met.

8.6. See the [ECO4 Flexible Route 4 Bespoke Targeting Guidance](#) for further information.

9. Audits

9.1. Suppliers are expected to provide and hold sufficient evidence (see 4.10) for all Flex projects and measures to ensure eligibility and compliance requirements have been

met. As such, 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.

- 9.2. Where we find evidence held and provided by the supplier to be insufficient or incorrect, the supplier may look to review this evidence with LAs. Compliance action may be taken if not rectified.
- 9.3. Where Scottish and Welsh Governments submit SoIs and declarations on behalf of LAs, they will be expected to carry out their own checks to ensure LAs have complied with scheme guidance.

Declarations

10. Issuing Declarations

- 10.1. LAs must 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).
- 10.2. A declaration confirms that a consumer, or multiple consumers, are considered eligible under one of the four referral routes (see 4.2), and that evidence has been collected to demonstrate this.
- 10.3. Multiple consumers can be referred on a single declaration, provided each individual referral has its own Unique Reference Number (URN) (see 11.11).
- 10.4. An LA can only issue declarations once they have published an SoI (see [Section 3: Publishing an SoI](#)).
- 10.5. An LA can also issue declarations for consumers of other areas where they have been given delegated authority. This should be made clear in the declaration.
- 10.6. A [Great British Insulation Scheme and ECO4 Flex LA Declaration to Supplier template](#) is available on our website. LAs can use their own declaration template if preferable.

What should a Declaration include?

- 10.7. A declaration must contain the following information:
 - Name of the LA
 - Name of LAs that are being acted on behalf of (if relevant)
 - The schemes for which the LA has published an SoI (i.e. ECO4 Flex only or a combined SoI for ECO4 and GBIS Flex)
 - SoI publication date
 - SoI version number
 - SoI website link
 - Unique Reference Number (URN)

- Address
- LA Officer name and contact details
- LA Officer signature (if required)
- Date on which the consumer was confirmed as eligible

10.8. Whilst we do not require a signature on the declaration, suppliers may still require one for their own auditing and administrative processes. This will be agreed with the LA, where applicable.

10.9. When sharing declarations, LAs are not required to specify which scheme (ECO4 or GBIS) is most suitable for a consumer's property. It is the responsibility of the supplier or installer to determine which scheme and measure(s) are most appropriate for a property.

Timings

10.10. The declaration must be issued **within the 12-month period preceding the day on which the project or measure is complete.**

10.11. The declaration should include the date on which the LA confirmed the consumer as eligible under one of the referral routes (see 4.2).

10.12. **There is no requirement to reassess a consumer's eligibility once a Declaration has been issued**, so long as the project starts within one year of the Declaration being issued, and this was done so under a valid SoI.

10.13. The SoI version included in the declaration should be the version that is live at the point at which the declaration is signed. If the declaration is being made retrospectively, and a different version of the SoI has since been published, the declaration should feature the previous SoI version.

10.14. [Figure 1](#) provides a step-by-step walkthrough of the Flex process, including the issuing of Declarations.

11. Submitting Declaration Notifications

- 11.1. LAs share Declaration Notifications with us to inform us of Declarations that they have shared with suppliers.
- 11.2. They allow us to ensure that measures are being received by consumers found to be in fuel poverty or vulnerable to a cold home.
- 11.3. A [Great British Insulation Scheme and ECO4 Flex Declaration Notification Template](#) can be found on our website. This must be used for declaration notifications, and alternative templates will not be accepted.

What should a Declaration Notification include?

- 11.4. A Declaration Notification should contain the following information:
 - Unique Reference Number (URN)
 - Referrals made outside of the LA's area (if relevant)
 - Referral route
 - Route 2 proxies (if relevant)
 - Route 4 application number (if relevant)
 - Address
 - LA area code¹⁰
 - Confirmation that the LA has been consulted by the supplier or installer about the carrying out of measures in a given property before the day on which the measure(s) is completed

¹⁰ See Tab 3.4 of the 'Headline HEE release tables' for LA area codes:
<https://www.gov.uk/government/collections/household-energy-efficiency-national-statistics>

- Date on which the consumer was confirmed as eligible
- SoI publication date
- SoI webpage link
- The schemes for which the LA has published an SoI (i.e. ECO4 Flex only or a combined SoI for ECO4 and GBIS Flex)

11.5. The template can be completed by manually adding data or through clicking on the drop-down boxes.

11.6. [The ECO4 and Great British Insulation Scheme Flex Data Dictionary](#) provides a description of all fields within the template, and general information to assist LAs in completing Declaration Notifications.

11.7. A signature is not required for the declaration notification.

Timings

11.8. Declaration notifications should be sent to us before the installation of measures is complete, though they do not need to be processed by us by that date.

11.9. LA declarations will remain valid until whichever date is soonest:

- a period of one year from the date of completion, or
- until 31 March 2026

11.10. [Figure 1](#) illustrates the Flex process, including the issuing of Declaration Notifications.

Creating a Unique Reference Number (URN)

11.11. An LA must create a Unique Reference Number (URN) for the property of each consumer within a declaration.

11.12. There cannot be more than one property with the same URN.

11.13. The URN must follow the format: *ANNNNNNNNN-NNNNN*

11.14. The first section of the URN ('ANNNNNNNNN') should be the 9-digit Office for National Statistics (ONS) code assigned to the LA. For example, the ONS code for Liverpool is

E08000012. All [Local Authority codes](#) and [Combined Authority codes](#) can be found on the ONS website.

11.15. The second section of the URN ('NNNNN') should represent the number of the declaration notification in the order it has been made. For example, the first declaration notification can be 00001.

11.16. The URN format is the same for both ECO4 and GBIS Flex.

11.17. To make declarations on behalf of another LA, the ONS code should represent the LA making the declaration, rather than that of the delegating LA.

11.18. Once we have processed the declaration notification, and the measures have been installed, suppliers must share a notification with us that lists the declaration URN and referral route used. This notification will be used for compliance and auditing purposes.

Sharing Declaration Notifications with Ofgem

11.19. LAs can share declaration notifications with us via email (ECO4Flex@ofgem.gov.uk).

11.20. Once an LA has submitted a declaration notification to us, they should receive an auto-response as proof of receipt.

11.21. We do not share information about declaration notifications with suppliers or installers. LAs and the supply chain should communicate directly regarding declaration notifications submissions, updates, and errors.

Mismatches

11.22. If data submitted to us by suppliers does not match the declaration notification, we will notify the supplier of the error to enable correction.

11.23. If the mismatch is not remediated, we will be minded to reject the measure.

11.24. Below, Table 2 presents some examples of example causes of mismatches and the remediation steps.

Table 2: Declaration mismatches and remediation steps

Error	Remediation steps
<p>Supplier notifies a project under Flex, but the project notification details do not match the Declaration Notification URN or address.</p> <p>This could occur if an LA has not submitted the declaration notification prior to the supplier notifying the project.</p>	<p>A solution may be that the LA notifies the supplier that the declaration notification has not been submitted. The project 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.</p>
<p>Project uses the same URN as a previous project.</p>	<p>Supplier would need to reassess their Project Notification to ensure that each measure has been installed with a separate URN.</p>

Data Sharing

11.25. LAs must adhere to the requirements of the [UK General Data Protection Regulation \(UK GDPR\)](#) and the [Data Protection Act 2018](#) when sharing and processing data between parties.

11.26. To share Declaration Notifications with Ofgem, a Data Sharing Agreement (DSA) must be in place to ensure data protection is upheld.

11.27. Members of the [Local Government Association \(LGA\)](#) can request a DSA template directly from the LGA. Non-members can request a template at ECO@ofgem.gov.uk.

11.28. These templates require only a signature from us and the LA to become effective.

11.29. If changes are made to the template, reapproval by us will be required and may cause delays.

11.30. We are unable to create or approve of data-sharing agreements between LAs and the supply chain.

Interaction with Funding from Other Schemes

11.31. Funding for measures delivered under ECO4 or GBIS Flex cannot be blended with other government schemes or grants.

11.32. Any measures delivered to a property from an alternative scheme must be installed either before an ECO4 or GBIS project begins, or after the project is complete.

11.33. This requirement includes, but is not limited to, the following schemes:

- [Warm Home Discount \(WHD\)](#)
- [Home Upgrade Scheme \(HUG\)](#)
- [Boiler Upgrade Scheme \(BUS\)](#)
- [Social Housing Decarbonisation Fund \(SHDF\)](#)

11.34. Consumers in receipt of payments from the following schemes are still eligible for ECO4 or 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 \(FIT\)](#)

Appendix

Figure 1: Flowchart of GBIS and ECO4 Flex Process

