

Consultation

Ofgem Great British Insulation Scheme and ECO4 Local Authority and Supplier Flex Consultation

Publication date: 05 April 2023

Response deadline: 28 April 2023

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We are consulting on proposed amendments for Local Authority (LA) and Supplier Flex within the existing Energy Company Obligation Scheme (ECO4), as well as the proposed administration of LA and Supplier Flex within the new energy efficiency scheme, the Great British Insulation Scheme (formerly known as ECO+). This will support ECO4 in the delivery of energy efficiency measures targeted at a wider range of households. ECO4 covers the period from 27 July 2022 until 31 March 2026, and the Great British Insulation Scheme is intended to run from 30 March 2023 until 31 March 2026. A separate Ofgem consultation will be published in due course, covering the bulk of the Great British Insulation Scheme. This consultation focuses on LA and Supplier Flex within ECO4 and the Great British Insulation Scheme.

We would like views from any stakeholders with an interest in the ECO scheme. We particularly welcome responses from Local Authorities, Devolved Administrations, suppliers, and installers. This document outlines the scope, purpose of the consultation questions and how you can get involved. Once the consultation is closed, we will consider all responses. In the interest of transparency, we will publish the responses we receive alongside a decision on next steps on our website at:

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1. Introduction

What are we consulting on?

- 1.1 The Great British Insulation Scheme is a new energy efficiency scheme for households, with early delivery allowed from 30 March 2023, and the scheme will run until 31 March 2026. Details about the scheme can be found in the Department for Energy Security and Net Zero’s Great British Insulation Scheme Government Response¹. The Great British Insulation Scheme is designed to be a predominantly single measure scheme, to achieve energy bill savings in as many houses as possible. The main objective of ECO4 is to reduce fuel poverty by improving the least energy efficient housing stock occupied by low income, vulnerable and fuel poor households. The Great British Insulation Scheme will boost this support to low-income households, whilst also broadening support to households previously not eligible.
- 1.2 Ofgem will administer the Great British Insulation Scheme in accordance with the Electricity and Gas (Energy Company Obligation) Order 2023 (ECO4A Order). Ofgem administer ECO4 in accordance with the Electricity and Gas (Energy Company Obligation) Order 2022 (ECO4 Order)².
- 1.3 This consultation focuses on LA and Supplier Flex, where a participating Local Authority or Devolved Administration engage with energy suppliers / installers, to refer private tenure households that it considers to be living in fuel poverty or on a low income and vulnerable to the effects of living in a cold home. This consultation will discuss how Ofgem proposes to administer LA and Supplier Flex within the Great British Insulation, highlighting the administration that will be adopted from ECO4 Flex for Flex within the Great British Insulation Scheme. This includes potential amendments to our current administrative approach within ECO4 Flex, so that there is a single coherent administrative process across both schemes, based upon the feedback we receive from this consultation. We are consulting on this ahead of the legislation, to give LAs and Supplier’s clarity on the proposed approach we may take to administer the scheme, in order to help them with their own preparations.

¹ <https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-eco-2023-2026>

² <https://www.legislation.gov.uk/ukxi/2022/875/made>

Disclaimer

- 1.4 Where we have summarised the government position, this is for the purposes of providing context to aspects of scheme administration that we are consulting on. For more details and a more extensive outline on the Government position, readers should refer to the Government Response³.
- 1.5 The Government has set out its intentions for the Great British Insulation Scheme in its Government Response, but in the unlikely event that there are minor changes between this consultation and when the ECO4A Order is laid in Parliament, and we deem those differences to have a material impact on the administration of the scheme, we will consider whether further stakeholder engagement is necessary.
- 1.6 We are not consulting on the legislation underpinning the Great British Insulation Scheme or ECO4 requirements. Legislation for the Great British Insulation Scheme and ECO4 falls under the remit of the Department for Energy Security and Net Zero who have previously published their own consultation on this area. Details of which can be found via the link in the list of related publications below.
- 1.7 If you have queries about the policy itself, please direct these to the Department for Energy Security and Net Zero (gbinsulation@beis.gov.uk)⁴.

Context and related publications

- Department of Energy Security and Net Zero Great British Insulation Scheme Government Response
<https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-eco-2023-2026>
- [Department of Energy Security and Net Zero ECO+ Consultation – November-December 2022](#)
- ECO4 Guidance: Supplier Administration
<https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-supplier-administration-v10>
- ECO4 Guidance: Delivery <https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-delivery>

³ <https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-eco-2023-2026>

⁴ <https://www.gov.uk/government/organisations/department-for-energy-security-and-net-zero>

Consultation - Great British Insulation Scheme and ECO4 LA and Supplier Flex Consultation

- ECO4 Guidance: Local Authority Administration
<https://www.ofgem.gov.uk/publications/eco4-guidance-local-authority-administration>
- [ECO4 Flex: Statement of Intent Template](#)
- [ECO4 Flex: Declaration Template](#)
- [ECO4 Flex: Declaration Notification Template](#)
- The Electricity and Gas (Energy Company Obligation) Order 2022
<https://www.legislation.gov.uk/uksi/2022/875/made>

Consultation stages

1.8 Our consultation will be open for 3 weeks from 05 April 2023, where we will be engaging with stakeholders, and then the consultation will close on 28 April 2023.

Figure 1: Consultation stages

Stage 1	Stage 2	Stage 3	Stage 4
Consultation open	Consultation closes (awaiting decision). Deadline for responses	Responses reviewed and published	Consultation decision/policy statement
05/04/2023	28/04/2023	Approximately end of May 2023	Approximately end of May 2023

How to respond

- 1.9 We want to hear from anyone interested in this consultation. Please send your response to the person or team named on this document's front page.
- 1.10 We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.
- 1.11 We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, data and confidentiality

- 1.12 You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations

2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

- 1.13 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.
- 1.14 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 3.
- 1.15 If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

General feedback

- 1.16 We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:
1. Do you have any comments about the overall process of this consultation?
 2. Do you have any comments about its tone and content?
 3. Was it easy to read and understand? Or could it have been better written?
 4. Were its conclusions balanced?
 5. Did it make reasoned recommendations for improvement?
 6. Any further comments?

Please send any general feedback comments to stakeholders@ofgem.gov.uk

2. LA and Supplier Flex

Section summary

This section provides an overview of how Flex within the Great British Insulation Scheme is delivered through the low-income eligibility group, and the proposed administrative approach for Flex across this scheme and ECO4.

Questions

- 1. Do you agree that there should be a single coherent process for Flex across ECO4 and the Great British Insulation Scheme, where the Statement of Intent, declaration and declaration notification templates are combined across the two schemes? Please explain your reasoning.**
- 2. Do you agree that LAs should be required to follow the Statement of Intent template produced by Ofgem? Please explain your reasoning.**
- 3. Do you agree that LAs should not be responsible for checking SAP bands? Please explain your reasoning.**
- 4. Do you agree with the pros and cons we have identified? Please explain your reasoning.**
- 5. Do you think there is an additional administration approach we should consider for Flex across ECO4 and the Great British Insulation Scheme? If yes, please outline.**

Great British Insulation Scheme low-income eligibility group

- 2.1 The low-income eligibility group is for people on means-tested benefits, and those living in the least efficient social housing, referred by a local authority (LA), devolved administration (DA) or energy supplier participating under the flexible eligibility element of the scheme.
- 2.2 Flexible eligibility within the Great British Insulation Scheme brings benefits, such as low-income owner-occupied households can get secondary heating controls, and low-income private rented sector households can get loft and cavity wall insulation.
- 2.3 Therefore, similar to ECO4, the Great British Insulation Scheme allows for participating local authorities to refer private tenure households which it considers to be in fuel poverty or on a low income and vulnerable to the effects of a cold home. There are various routes which local authorities can use to refer eligible homes which are summarised in Table 1 below.

Table 1: Comparison between ECO4 and the Great British Insulation Scheme LA and Supplier Flex Routes: SAP band eligibility

ECO4			GBIS		
Route	SAP Bands	Tenure Type	Route	SAP Bands	Tenure Type
Route 1	D, E, F, G	Owner-occupied	Route 1	D, E, F, G	Owner-occupied
	E, F, G	PRS*		D, E (including F and G if exempt from MEES*)	PRS
Route 2	E, F, G	Owner-occupied	Route 2	E, F, G	Owner-occupied
	E, F, G	PRS		E (including F and G if exempt from MEES)	PRS
Route 3	D, E, F, G	Owner-occupied	Route 3	D, E, F, G	Owner-occupied
	E, F, G	PRS		D, E (including F and G if exempt from MEES)	PRS
Route 4	D, E, F, G	Owner-occupied	Route 4	N/A*	
	E, F, G	PRS			

*Route 4 has been removed for GBIS

*PRS = Private Rented Sector

*MEES = Minimum Level of Energy Efficiency Standard

2.4 Despite eligibility differences (pre-installation SAP bands) between ECO4 and the Great British Insulation Scheme outlined in Table 1, from an administrative perspective, we propose the Great British Insulation Scheme Flex process to be the same as the ECO4 Flex process, including the roles and responsibilities of the different parties involved. We have sought to keep administration of the two schemes as the same, to avoid needless complexity in the administration processes and to avoid confusion.

Questions

1. Do you agree that there should be a single coherent process for Flex across ECO4 and the Great British Insulation Scheme, where the Statement of Intent, declaration and declaration notification templates are combined across the two schemes? Please explain your reasoning.

Proposed administrative approach for ECO4 and the Great British Insulation Scheme

2.5 The administration approach ie how LAs / DAs refer eligible households through the Statement of Intent, declaration and declaration notification templates, would be similar to the current ECO4 process outlined in Appendix 1. Except in one element, the Standard Assessment Procedure (SAP) band eligibility, where we are proposing that suppliers confirm these. This is the energy efficiency rating of a domestic premise that is expressed by assigning it a band from A-G.

LAs are not responsible for checking SAP bands

2.6 We propose that LAs would not be responsible for checking household SAP bands, as a result SAP bands won't be included in the SoI. There is already a requirement that installers / suppliers conduct an RdSAP assessment at the premises before a determination is made on what measures might be appropriate to install. As such, the supplier should provide an up-to-date confirmation of the SAP band to Ofgem in their measure notifications, which Ofgem validate against TrustMark's data warehouse. This would mean that the LA can focus on being responsible for evidencing householder eligibility, whilst the supplier / installer will be responsible for determining and evidencing the SAP band.

2.7 Without the responsibility of checking the SAP band, the LA declarations would not need to specify which scheme is more suitable for the household. This would allow the RdSAP assessment, mandated before any potential measures can be installed, to determine scheme suitability in combination with LA declared householder eligibility.

Statement of Intent

2.8 A Statement of Intent (SoI) is defined in the ECO4 Order⁵, as "a statement that the authority intends to identify households that may benefit from the installation of a measure as part of an ECO4 project". Ofgem's SoI template allows LAs to state publicly the eligibility criteria they will use to identify householders under flexible eligibility, reflecting only ECO4 and / or the Great British Insulation Scheme criteria.

2.9 A LA or DA must publish a SoI before it can make declarations that households meet the eligibility criteria.

⁵ <https://www.legislation.gov.uk/ukxi/2022/875/made>

- 2.10 The SoI template will be simplified so that SAP bands are removed, making it clear that LAs / DAs check that evidence meets low income and / or vulnerable route requirements only.
- 2.11 We propose LAs use a combined SoI template for both ECO4 and the Great British Insulation Scheme, with a separate section on both schemes to reduce the required administration on LAs.
- 2.12 If LAs only intend to participate in one of the schemes, they still need to use the combined SoI. The combined SoI will include a section where they can state whether or not they are partaking in ECO4, the Great British Insulation Scheme or both schemes.
- 2.13 As in ECO4, the participating LA should publish the signed SoI on their website outlining what routes they will be using for Flex across ECO4 and the Great British Insulation Scheme.
- 2.14 The SoI must be signed by the CEO or dedicated responsible person. A wet signature on the published version is not a legal requirement. However, we would strongly urge LAs to provide either a wet or electronic signature, or as a minimum a printed name and date, along with contact details of the best person to contact regarding their SoI. Signatures cannot be auto-populated or duplicated.
- 2.15 LAs need to republish any SoIs they have already published for ECO4 if they are partaking in both ECO4 and the Great British Insulation Scheme. However, LAs that don't intend to partake in the Great British Insulation Scheme as well, may keep their ECO4 SoIs that they have already published.

Questions

- 2. Do you agree that LAs should be required to follow the Statement of Intent template produced by Ofgem? Please explain your reasoning.**
- 3. Do you agree that LAs should not be responsible for checking SAP bands? Please explain your reasoning.**

Declaration to suppliers

- 2.16 We propose that LAs and DAs are also required to produce and sign declarations for all households that they refer for each scheme to the supplier or installer, to ensure measures they notify are eligible under the scheme. Declarations that are signed by third parties will be rejected. The declaration must be signed by an LA Officer (ie the dedicated responsible person at the LA that is responsible for checking and verifying declarations and associated evidence) as this confirms that

the checks have been made by the LA Officer, and that the LA Officer is declaring that the household listed meets the criteria under whichever specific route they are referring, of which the LA has collected householder eligibility evidence to demonstrate this. The signature cannot be auto-populated or duplicated, a wet or electronic signature is suitable.

- 2.17 A declaration is required for each individual household that the LA refers to the installer / supplier, ie on a household per household basis.
- 2.18 We propose combining the declaration template for ECO4 and the Great British Insulation Scheme because the LA won't know what scheme households are eligible for (apart from ECO4 Route 4), as LAs are not responsible for checking SAP bands.
- 2.19 Once the declaration has been sent to the supplier / installer, the supplier / installer will conduct an RdSAP assessment to determine the SAP band and what scheme each household will be processed through.

Declaration notification

- 2.20 We propose that the LA will submit a combined ECO4 and Great British Insulation Scheme declaration notification to Ofgem that is scheme agnostic (ie scheme unknown).
- 2.21 Please note that the declaration itself should be sent to the supplier / installer, but the declaration notification is sent to Ofgem by the LA.
- 2.22 The ECO4 Flex Data Dictionary currently provides a description of all the fields and general information to help LAs complete the declaration notification for ECO4 Flex.
- 2.23 Ofgem will confirm to the LA / DA whether or not the declaration notification follows the accepted format.
- 2.24 Because suppliers, installers and LAs / DAs are free to and encouraged to establish their own working relationships, it is up to the LA / DA to decide how they wish to communicate with the supply-chain and inform them that the declaration notification has been sent to Ofgem.

Matching process

- 2.25 We propose that the supplier will notify Ofgem of measure installation completion via the supplier measure notification form. Ofgem will match the supplier measure notification against the declaration notification previously received from the LA. If the data does not match, Ofgem will produce and send a 'mismatch error report'

to the supplier, where the LA will have to help resolve any issues where they have agreed arrangements that involve LA support in resolving mismatches.

Evidence holding requirements

- 2.26 We propose that both LAs and suppliers / installers must retain access to declarations for the duration of the ECO4 and the Great British Insulation Scheme, including three years after Final Determination at a minimum.
- 2.27 The LAs are responsible for assessing, collecting, and retaining the householder eligibility of each household, which suppliers need necessary access to where they have agreed arrangements that involve LA support in resolving mismatches.
- 2.28 The suppliers / installers are responsible for assessing, collecting, and retaining SAP band evidence at each household via an RdSAP assessment.

Table 2: Pros and cons of the proposed administrative approach

Stakeholder	Pros	Cons
LA / DA	<ul style="list-style-type: none"> • Reduced LA confusion between the schemes as the administration process for both schemes is the same. • Reduced administration and potential reduced costs for LAs. The LA would only need to issue one SoI, declaration and declaration notification that would cover eligibility on both schemes. • Not responsible for checking the SAP bands at each household. 	<ul style="list-style-type: none"> • LAs who have already published a SoI for ECO4 would need to republish their SoI if they are now participating in the Great British Insulation Scheme as well.
Supplier / installer	<ul style="list-style-type: none"> • No extra responsibility as an RdSAP assessment already takes place at each household. • Up to date and consistent SAP band assessments will be conducted. • No mismatches to fix where LAs have collected an old EPC that is not consistent with the supplier / installer RdSAP assessment. 	<ul style="list-style-type: none"> • No initial SAP band checks conducted by LAs.
Householder	<ul style="list-style-type: none"> • More efficient and simplified administration means more LAs likely to engage, resulting in greater delivery under Flex and reaching those who wouldn't have been eligible under ECO otherwise. 	<ul style="list-style-type: none"> • Less clarity on what scheme they are eligible for.
Ofgem	<ul style="list-style-type: none"> • Fewer SAP band mismatch errors for Ofgem to flag. For example, a mismatch of SAP bands between an EPC that a LA has collected against the RdSAP assessment the supplier / installer conducts anyway. • Less comprehensive new LA guidance needed for the Great British Insulation Scheme, as the processes are aligned with ECO4. • No additional procedures required for processing of combined declaration notification templates for both schemes. • Easier and quicker reviews of the SoI and declaration notifications because the SoI will be simplified, and combined templates will be used for both schemes. 	<ul style="list-style-type: none"> • Ofgem would need to reassess republished SoIs if LAs / DAs already published an ECO4 SoI and are now participating in the Great British Insulation Scheme as well.

Questions

- 4. Do you agree with the pros and cons we have identified? Please explain your reasoning?**
- 5. Do you think there is an additional administration approach we should consider for Flex across ECO4 and the Great British Insulation Scheme? If yes, please outline.**

Interim declaration notification process (submissions via email)

- 2.29 For the beginning of the Flex within the Great British Insulation Scheme, authorities will be expected to provide Ofgem with their declaration notification via email: ECO4Flex@ofgem.gov.uk.
- 2.30 The ECO4 register for use by LAs is in development. We are exploring whether the ECO4 register for use by LAs may also be used for Flex within the Great British Insulation Scheme. Timelines cannot be provided right now, however, the upcoming guidance will be updated once the register for use by LAs becomes available, and we will communicate this to LAs in newsletters / workshops. Once built, the LA should send their declaration notification to Ofgem on the register, and the matching process to the energy supplier's measure notification will be automated.

Appendix 1 - The current administrative approach in ECO4

2.31 The roles of LAs / DAs, suppliers / installers, Ofgem and The Department of Energy Security and Net Zero are detailed below, summarising their responsibilities within the current administrative approach in ECO4 Flex.

Table 3: Summary of the roles and responsibilities of the different organisations involved in ECO4 flexible eligibility

<u>Organisation</u>	<u>Summary of roles and responsibilities</u>
<p>Local Authority / Devolved Administration</p>	<p>Statement of Intent</p> <ul style="list-style-type: none"> • LAs / DAs can volunteer to participate in ECO4 Flex to identify eligible households. To participate, a LA / DA will need to publish a signed Statement of Intent (SoI) which outlines their intention to participate in the scheme and their commitment to follow the scheme rules and routes as set out in the ECO4 Order⁶. • LAs are responsible for checking and confirming each individual household's SAP band, as a result the SoI template details what SAP bands are eligible for each route. <p>Declaration</p> <ul style="list-style-type: none"> • LAs / DAs are responsible for determining whether households are eligible and will also need to produce signed declarations to suppliers / installers for all households they identify. • LAs / DAs can identify households in their area and for other areas where they have been given delegated authority from another LA / DA. <p>Declaration notification</p> <ul style="list-style-type: none"> • LAs / DAs must submit a declaration notification for all households they identify to Ofgem. <p>Evidence holding requirements</p> <ul style="list-style-type: none"> • LAs / DAs are responsible for collecting and retaining sufficient evidence, which suppliers need necessary access to, for up to three years after the Final Determination of ECO4 at a minimum.

⁶ <https://www.legislation.gov.uk/uksi/2022/875/made>

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<p>Supplier / Installer</p>	<ul style="list-style-type: none"> • The ECO4 Flex route used to identify households and the measures installed at the relevant home should be notified to Ofgem. • Suppliers can also use their own energy debt data to identify and refer eligible households through ECO4 Flex or work with relevant authorities under the scheme. Where suppliers self-refer an eligible ECO4 Flex household, they must produce details of this on their measure notification. • Suppliers / installers must consult with the LA or DA about the carrying out of measures in the premises, the suppliers / installers conduct an RdSAP assessment at the premises before a determination is made on what measures might be appropriate to install. • Suppliers are responsible for collecting and retaining declarations from LAs, and they need to have necessary access to sufficient evidence that the LA collects and retains.
<p>Ofgem</p>	<ul style="list-style-type: none"> • Ofgem administers the ECO4 scheme and produces guidance for suppliers / installers, LAs / DAs and supply-chain members. • Ofgem has set up a process to receive declarations from LAs and to check these against supplier notifications. • Ofgem is responsible for delivering the annual LA audits.
<p>The Department of Energy Security and Net Zero</p>	<ul style="list-style-type: none"> • The Department of Energy Security and Net Zero is responsible for setting the overall policy for the scheme. • They will also review applications under Route 4: Bespoke Targeting⁷.

⁷ <https://www.gov.uk/government/publications/energy-company-obligation-eco4-flex-route-4-bespoke-targeting>

2.32 The referral routes for ECO4 Flex are outlined below.

Table 4: ECO4 Flex Referral Routes

Route	Explanation
<p>Route 1: Household Income</p>	<p>Households with a gross annual income of less than £31,000, provided they have a pre-installation SAP band of D-G if they are owner occupied properties, or E-G if they are private rented sector properties. This cap applies irrespective of the property size, composition or region and is from all sources of income, including both non means tested and means tested benefits.</p> <p>This is the combined whole household income, including every person 18+ years living at that address, such as lodgers and elderly relatives etc.</p>
<p>Route 2: Proxy Targeting</p>	<p>Households that meet at least two of the following proxies (provided they have a pre-installation SAP band of E-G for owner occupied households and private rented sector households).</p> <p>*Proxies 1 & 3 and proxies 6 & 7 cannot be used in combination with each other.</p> <p>Proxy 1) Homes in England in Lower-layer Super Output Area (LSOA)1-3 on the English Indices of Deprivation 2019⁸ or homes in Wales in LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019⁹, or homes in Scotland in "data zone" 1-3 on the Scottish Index of Multiple Deprivation 2020^{10*}</p> <p>Proxy 2) A person living at the premises receives a Council Tax reduction on the grounds of low income</p> <p>Proxy 3) A person living at the premises is considered to be vulnerable to the cold under the National Institute for Health and Care Excellence (NICE) Guidance: Recommendation 2, for a reason other than their low income^{11*}</p>

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/IoD2019_Statistical_Release.pdf

⁹ <https://www.gov.wales/welsh-index-multiple-deprivation-full-index-update-ranks-2019>

¹⁰ <https://www.gov.scot/collections/scottish-index-of-multiple-deprivation-2020/>

¹¹ <https://www.nice.org.uk/guidance/ng6/chapter/1-Recommendations#recommendation-2-ensure-there-is-a-singlepointofcontact-health-and-housing-referral-service-for>

	<p>Proxy 4) A child living at the premises is eligible for free school meals, due to low-income¹²</p>
	<p>Proxy 5) A person living at the premises is supported by a LA run scheme that is named and described in their Statement of Intent, and established to support people living on a low income and vulnerable to the cold under NICE Guideline NG6</p>
	<p>Proxy 6) A person living at the premises has been referred to the LA for support by their energy supplier, Citizens Advice or Citizen’s Advice Scotland because they have been identified by the referrer as struggling to pay their gas or electricity bills. This proxy is restricted to those mentioned in this list</p>
	<p>Proxy 7) Households identified through supplier debt data. This route enables obligated suppliers to use their own debt data to identify either Non Pre-Payment meter households (non-PPM), or Pre-Payment meter households (PPM)*.</p> <p>a) Non-PPM customers: These are customers who have 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 3rd party deductions.</p> <p>b) PPM customers: Suppliers may also identify PPM households who:</p> <ul style="list-style-type: none"> • have either self-disconnected or received supplier Discretionary/Friendly credit within the last 13 weeks ending with the day on which the declaration is made; or • are in a debt repayment plan with their energy supplier; or • repaying their fuel debt through 3rd party deductions.
<p>Route 3: NHS Referrals</p>	<p>Households referred to the LA as housing a person suffering from a severe or long-term ill-health condition which is adversely affected by living in a cold home, provided they have a pre-installation SAP band of D-G if they are owner occupied properties, or E-G if they are private rented sector properties.</p> <p>The person’s severe or long-term health condition must be due to:</p>

¹² Under section 512ZB(4) of the Education Act 1996 or section 53 of the Education (Scotland) Act 1980

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	<ul style="list-style-type: none">• A cardiovascular condition,• A respiratory disease,• Limited mobility, or• Immunosuppression. <p>The LA must complete a declaration certifying that it has received a referral from one of the following:</p> <ul style="list-style-type: none">• A person registered in the General Practitioner (GP) Register,• A Scottish Health Board,• A Welsh Health Board,• An NHS Foundation Trust, or• An NHS Trust.
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Route 4: Bespoke Targeting	<p>Suppliers and LAs can submit a proposal via the Route 4 Bespoke Targeting Application form to The Department of Energy Security and Net Zero (beisecoteam@beis.gov.uk) where they have identified new methods to identify low income and vulnerable households. The application must be approved by or on behalf of the Government Secretary of State (SoS).</p> <p>Applications need to demonstrate a number of factors, aside from living in an owner-occupied D, E, F, or G SAP band property or for homes in the private rented sector E, F or G home. Applicants will also need to demonstrate, underpinned by evidence, that the proposed methodology is more effective at identifying low-income households than the criterion offered under Routes 1 and 2.</p> <p>Applications should also demonstrate that assistance reaches the majority of households who are not in receipt of any means tested benefits that fall within the help to heat group benefits:</p> <ul style="list-style-type: none">• over 50% of the premises that meet the criteria are not occupied by a member of the help to heat group, and that• at least 75% of the premises that meet the criteria are owner-occupied premises occupied by at least one person living in fuel poverty; or• at least 90% of the premises that meet the criteria are private rented premises occupied by at least one person living in fuel poverty. <p>Owner-occupier D, E, F, and G and private rented sector E, F, and G properties may qualify for ECO4 Flex route 4, providing that the LA is consulted by the supplier prior to completed installation, and that their supporting supplier or LA application has been approved by the Secretary of State, (SoS).</p> <p>Once the Department of Energy Security and Net Zero has approved an application a reference number will be provided, and this should be notified to Ofgem for all relevant projects. The 10% uplift is only awarded subject to all criteria and minimum requirement rules being met.</p>
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Appendix 2 – List of questions

- 1. Do you agree that there should be a single coherent process for Flex across ECO4 and the Great British Insulation Scheme, where the Statement of Intent, declaration and declaration notification templates are combined across the two schemes? Please explain your reasoning.**
- 2. Do you agree that LAs should be required to follow the Statement of Intent template produced by Ofgem? Please explain your reasoning.**
- 3. Do you agree that LAs should not be responsible for checking SAP bands? Please explain your reasoning.**
- 4. Do you agree with the pros and cons we have identified? Please explain your reasoning.**
- 5. Do you think there is an additional administration approach we should consider for Flex across ECO4 and the Great British Insulation Scheme? If yes, please outline.**

Appendix 3 – Privacy notice on consultations

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest ie a consultation.

4. We will not be sharing personal data with any organisations outside of Ofgem.

5. Your personal details will be held until 6 months past the beginning of the scheme.

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you

- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.

10. More information For more information on how Ofgem processes your data, click on the link to our "[Ofgem privacy promise](#)".