

Freedom of Information – Response – 27317

Under the Freedom of Information Act 2000, please supply the following information and documents for the period 1 April 2022 – present:

1. The number of staff assigned to Warm Homes Suffolk, ECO4/Flex, HUG2 and GBIS processing teams from January 2022 to present, to include job titles and full time equivalent (FTE) figures. If staff were hired prior to Jan 2022 to set up and deliver a team for grant process, please include any dates prior to Jan 2022 to present.

For clarity, the Warm Homes Suffolk branding is used by the consortium of Suffolk councils (Districts, Borough and County) under which various grant schemes are administered. For the ECO4 scheme this is run by OFGEM with the councils' responsibility to process applications made under the ECOFlex route. Suffolk County Council, on behalf of the councils ensures that a Statement of Intent is present and signed by the relevant councils. The scheme is then administered by East Suffolk Council on the councils' behalf. Suffolk County Council supports that work as appropriate. The councils receive no funding from OFGEM to administer applications. The Statement of Intent can be found on the Warm Homes Website [SOI — Warm Homes Suffolk](https://www.warmhomessuffolk.org/working-with-us/statement-of-intent)
<https://www.warmhomessuffolk.org/working-with-us/statement-of-intent> .

ECO4/Flex

No SCC staff assigned

GBIS

No SCC staff assigned

Warm Homes Suffolk/HUG2

Five SCC staff assigned:

- 2022 1 FTE Environment Strategy Manager
- 2023 0.5 FTE Environment Strategy Manager
- 2023 to date 1 FTE Energy and Environment Project Manager
- 2023 1 FTE Energy and Environment Assistant Project Manager
- 2026 1 FTE Energy and Environment Assistant Project Manager

Processing of ECO/GBIS via the ECO Flex route is carried out by staff at East Suffolk Council on behalf of the consortium of Suffolk Local Authorities.

2. Any internal communications, emails, meeting minutes, or memos that record staff reductions, redeployments, redundancies, or capacity changes affecting ECO4/Flex or grant processing during the period.

None.

3. Copies of any emails, letters, or formal communications sent from Warm Homes Suffolk to ECO4 suppliers (including MacBook Gas) that relate to processing times, invoicing, declaration issuance, or capacity constraints during the period.

See attached file: [Email 24-09-2025 - ECO4 Referrals_redacted.pdf*](#).

4. Copies of any correspondence and/or financial agreements with all suppliers, including Macbrook Gas, on what amount of funding East Suffolk Council received for the administrative processing of grant funding. Please include if this amount differed for the type of grant processed and what the difference was.

Fees for ECO Flex applications are found at [ECO Flex — Warm Homes Suffolk](#).

5. Any performance metrics, targets, or internal KPIs for Flex Declaration turnaround times or application processing times used during the period.

None, as these are not required by the Office of Gas Electricity and Markets (OFGEM).

6. Records of any decisions, briefings, or emails that discuss the prioritisation of applications or the allocation of staff to Warm Homes Suffolk tasks during the period.

See attached file: [Email 24-09-2025 - ECO4 Referrals_redacted.pdf](#).*

7. The average time it takes to review and complete a Flex Declaration and send it to a supplier for further processing.

Suffolk County Council does not hold this information; you may wish to redirect your response to East Suffolk Council.

8. A full explanation of why the Flex Declaration for my application was not raised and sent within the timeframes communicated to me.

9. A timeline of internal actions and dates for my case, including which party managed the file at each stage.

All information released in response to a Freedom of Information Act 2000 (FOIA) or Environmental Information Regulation 2004 (EIR) request is deemed to be in the public domain. As such we must consider whether or not the requested information qualifies as personal information and should therefore not be released into the public domain.

Information relating to the requester's application is considered to be personal information and is therefore exempt from disclosure under **section 40** of the FOIA and **regulation 13** of the EIR.

The Council considered the following, including the possible consequences of disclosure for the data subjects concerned and their reasonable expectations as to the use of their data:

- expectations of the individuals concerned about personal information being put into the public domain;
- reasonable expectations - the data subjects concerned would have a legitimate expectation of privacy concerning their personal information and would not have anticipated this being put into the public domain;
- whether or not the requested information could be anonymised; and
- balancing the individual's rights and the legitimate interests - In past cases the Information Commissioner has weighed the individual's rights to privacy against the public interest in disclosure. There is no presumption in favour of releasing personal data.

This is an absolute exemption, which means that if the condition is satisfied there is no additional public interest test to consider.

In assessing fairness, the Council considered the likely consequences of disclosure of the requested information. Personal information should not be used in ways that have unjustified adverse effects on the individuals concerned. The council also considered whether such disclosure would be within the reasonable expectations of the individuals, given that any response to a request under the FOIA or EIR is deemed to be in the public domain. The council believes that in this instance it is not fair to disclose personal data and is therefore withholding the requested information under section 40 of the FOIA and regulation 13 of the EIR.

10. Copies of any internal guidance, emails or records that relate to the processing of Flex Declarations and invoicing for ECO4 Flex applications during the period January 2022 – present.

None apart from emails in file '*Email 24-09-2025 - ECO4 Referrals_redacted.pdf*', as processing of invoices is done by East Suffolk Council

11. An outline of all contracts or schedules showing administrative fees retained by East Suffolk Council as well as any delivery partner/supplier.

It has been established that the information you requested is not held by Suffolk County Council. If you have not already done so, then you may wish to contact East Suffolk Council which is responsible for fee administration.

*Redacted Information

Please see the above notes relating to **section 40** of the FOIA and **regulation 13** of the EIR.

From: [REDACTED] <[REDACTED]@suffolk.gov.uk>
Date: Wednesday, 24 September 2025 at 11:15
To: [REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>, Eco <Eco@eastsuffolk.gov.uk>, [REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>
Cc: [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>, [REDACTED] <[REDACTED]@suffolk.gov.uk>, [REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>
Subject: RE: URGENT: ECO4 Referrals
[REDACTED]

Just a quick note that one of staff has gone off ill for short-medium term so we are now in the position that things may take significantly longer than we (or you) would like.

Regards
[REDACTED]

Replying to:

From: [REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>
Sent: 23 September 2025 09:26
To: Eco <Eco@eastsuffolk.gov.uk>; [REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>
Cc: [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>
Subject: RE: URGENT: ECO4 Referrals

EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. [Read more information](#) for help from Suffolk IT

Good morning, [REDACTED],

We really appreciate this update. As mentioned, would you be able to provide us some updates on the current applications so we can provide updates with the residents, as I did not receive this last week. We are currently facing many worried or scared residents as the cold is now creeping in, so it is imperative we can at least provide some updates or a timeframe to hope on.

Do you have a live progress tracker we can have visibility on please?

Kind regards,


[REDACTED]
(Energy Company Obligations Co-ordinator)

Macbrook Gas Ltd
Attleborough Office
High Street

Attleborough
Norfolk
NR17 2EH
Old Buckenham Office
Unit 8
Focus Business Park
Bunns Bank Road
Old Buckenham
Norfolk
NR17 1GY

www.macbrookgas.co.uk
enquiries@macbrookgas.co.uk
<image004.jpg>

From: [REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>
Sent: 20 August 2025 10:33
To: [REDACTED] <[REDACTED]@suffolk.gov.uk>
Cc: [REDACTED] <[REDACTED]@eastssuffolk.gov.uk>; whhp
<whhp@eastssuffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>;
[REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>; [REDACTED]
[REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>
Subject: Re: URGENT: ECO4 Referrals

 **EXTERNAL EMAIL:** Don't click any links or open attachments unless you trust the sender and know the content is safe. [Read more information](#) for help from Suffolk IT
Hi [REDACTED]
Thank you for your swift reply, I will keep an eye out for flex in September.

Kind regards
[REDACTED]
Macbrook Gas Ltd
Attleborough Office
High Street
Attleborough
Norfolk
NR17 2EH
Old Buckenham Office

From: [REDACTED]
Date: Wednesday, 20 August 2025 at 10:30
To: [REDACTED] | Macbrookgas Ltd
Cc: [REDACTED], whhp, [REDACTED], [REDACTED] | Macbrookgas Ltd,
[REDACTED] | Macbrookgas Ltd
Subject: RE: URGENT: ECO4 Referrals
[REDACTED]

We are processing flex applications, however, we are resource limited during the Summer holidays and our priority has been with HUG2 closedown and Warm Homes Local Grant start up.

So from the beginning of September I hope that we can be a bit more responsive to applications.

Regards

[REDACTED]

From: [REDACTED] | Macbrookgas Ltd
Sent: 20 August 2025 10:22
To: [REDACTED]
Cc: [REDACTED]; whhp; [REDACTED]; [REDACTED] | Macbrookgas Ltd ;
[REDACTED] | Macbrookgas Ltd
Subject: Re: URGENT: ECO4 Referrals

EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. [Read more information](#) for help from Suffolk IT

Good Morning,
I hope this email finds you well.

Could we have an update on your position with regards to issuing flex as we now have several customers who are in desperate need of a new boiler due to being the appliance beyond economical repair.

As a company we do allocate a small amount of funds for people who are in desperate need and potentially don't qualify or in an area where a council can't accommodate flex to allow us to install a boiler or help the customer out so if flex is still on hold could you let me know at your earliest convenience and we will look to arrange an alternative for the customer.


Thanks

Kind regards

[REDACTED]

Macbrook Gas Ltd
Attleborough Office
High Street

Attleborough
Norfolk
NR17 2EH
Old Buckenham Office
Unit 8
Focus Business Park
Bunns Bank Road
Old Buckenham
Norfolk
NR17 1GY


www.macbrookgas.co.uk
enquiries@macbrookgas.co.uk
<image002.png>

Notice: The information contained in this email (and any attachment) is confidential, privileged and protected from disclosure. It is intended for the sole use of the addressee(s). If you are, or your organisation is, not a named addressee of this message, please notify us immediately and await instructions concerning the destruction of all records of it or copies taken of it. You are hereby notified that any unauthorised use, disclosure, storage, printing or copying is strictly prohibited.

Disclaimer: This email and any attachment to it may contain software viruses. No liability is accepted for any damage which you may sustain as a result of software viruses. You should carry out your own virus checks before opening this email or attachment.

From:  | Macbrookgas Ltd <@macbrookgas.co.uk>

Sent: 08 August 2025 11:05

To:  <@suffolk.gov.uk>; 
<@eastsuffolk.gov.uk>

Cc: whhp <whhp@eastsuffolk.gov.uk>; 
<@suffolk.gov.uk>;  | Macbrookgas Ltd
<@macbrookgas.co.uk>;  | Macbrookgas Ltd
<@macbrookgas.co.uk>; Admin | Macbrookgas Ltd
<admin@macbrookgas.co.uk>;  | Macbrookgas Ltd
<@macbrookgas.co.uk>;  | Macbrookgas Ltd
<@macbrookgas.co.uk>

Subject: Immediate Implementation of New Compliance Procedures – ECO4 Health Route

Dear ,

I hope this email finds you well.

Following your email correspondence yesterday and the concerns raised regarding the misuse of the ECO4 health eligibility route, we held an emergency internal meeting this morning to address the matter in full with all team members involved in the delivery of the scheme.

We take compliance, scheme integrity and the delivery of government funded programmes extremely seriously. As such with immediate effect, we have implemented the attached new screening and referral process to ensure full alignment with OFGEM guidance and the Suffolk Statement of Intent.

Key actions already in place:

- All referrals from Lifetime Savings Ltd have been blocked from being sent directly to any Local Authority.
- Every referral, particularly under Route 3 (Health), will be screened by an MBG staff member before submission.
- A recorded verification call will be made to the applicant to confirm the qualifying health condition, with records retained for a minimum of 12 months for audit purposes.
- Written confirmation of the qualifying condition will be required from a healthcare professional with a clinical relationship to the applicant before submission.

The attached document outlines the full step-by-step process which clearly demonstrates the controls we have put in place.

We want to reassure you that we fully support your compliance review and share your commitment to maintaining the credibility of the ECO4 scheme and wider schemes we deliver, our priority is to ensure that only genuinely eligible households benefit from this support.

In [REDACTED] absence can @ [REDACTED] confirm receipt of this email, thank you and please do reach out if we can assist you further.

Kind regards

[REDACTED]

Macbrook Gas Ltd

Attleborough Office

High Street

Attleborough

Norfolk

NR17 2EH

From: [REDACTED] <[REDACTED]@suffolk.gov.uk>
Date: Thursday, 7 August 2025 at 15:54
To: [REDACTED] | Macbrookgas Ltd <[REDACTED]@macbrookgas.co.uk>
Cc: [REDACTED] <[REDACTED]@eastssuffolk.gov.uk>, whhp <whhp@eastssuffolk.gov.uk>, [REDACTED] <[REDACTED]@suffolk.gov.uk>
Subject: URGENT: ECO4 Referrals

Dear [REDACTED]

I'm writing on behalf of the Suffolk local authorities which operate as the consortium for Warm Homes Suffolk and the administrator for ECO flex applications.

We are keen to support eligible homes in receiving energy efficiency upgrades to their homes. However, it has been brought to our attention that Lifetime Savings Ltd is marketing government-funded ECO4 grants by promoting a wider than expected health conditions as a route to eligibility under the Suffolk ECO Statement of Intent. We are particularly concerned that conditions such as "hayfever" and "migraines" are being cited to support grant applications. The use of such health conditions to justify ECO4 funding is unacceptable and falls outside the intended scope and spirit of the ECO scheme, as defined by OFGEM. These practices do not align with OFGEM's ambition to ensure that the most vulnerable in our society are kept safe and warm in their homes through targeted support.

As the administrators of ECO flex in Suffolk, we have a statutory obligation to ensure that all ECO Flex declarations are accurate, appropriate, and fully compliant with OFGEM's guidance and eligibility criteria.

As a result, all ECO applications submitted via the health route to eligibility have been placed on hold while we conduct a full compliance review.

To proceed with these applications, we now require written confirmation of the health conditions used to support each individual case. This confirmation must be provided by a local healthcare professional who has a clinical relationship with the applicant. Where this is not possible, the application must be withdrawn or resubmitted using an alternative, valid route to eligibility.

We remind you that OFGEM funding is provided to support low-income, vulnerable households in improving home energy efficiency and reducing fuel poverty. Misuse of the scheme undermines its credibility and the support it offers to those who need it most. We have both the responsibility and the authority to decline declarations where there is evidence of abuse or misrepresentation.

We request your immediate cooperation in addressing this matter. Failure to comply may result in a suspension of your access to declarations issued under the Suffolk ECO Flex scheme.

We would ask you to hold back any further, new, applications until there is confirmation of eligibility in line with ECO4 and OfGem guidance.

If you wish to discuss further please let me know. We await to hear from you.

Regards

[REDACTED]

[REDACTED]

(he/him)

Environment Strategy Programme Manager

Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, Russell Road, Ipswich, IP1 2BX