

REFORMING CONSUMER PROTECTION FOR HOME UPGRADE SCHEMES

NATIONAL RETROFIT HUB RESPONSE

On 17 June 2026 the Department for Energy Security and Net Zero launched a consultation on [Reforming consumer protection for home upgrade schemes](#). The deadline for responses is **11:59pm on 10 September 2026**.

This response has been informed by the NRH's board, advisory panel and two interactive workshops with our network. It has also been shaped by our industry engagement, working group activity and aligned projects since our work began in 2023. Here we answer the questions most relevant to the NRH and our mission.

We encourage our network and the wider sector members to respond to the consultation with your own insights. We hope the answers we give can be useful for others completing their own responses. There may be questions and sections that we do not respond to but that may be relevant to your work. Please do read through the consultation and answer what is most relevant to you and your organisation.

CHAPTER 1: THE CASE FOR CHANGE

1. Does the case for change accurately describe the root causes of issues with the current consumer protection system?

Many of the root causes identified by this consultation resonated with the NRH network, these points were identified as particularly impactful:

- Complex and overlapping responsibilities across multiple organisations. Accountability for managing whole-system performance in multi-measure installations is particularly unclear;
- Inconsistent auditing and assurance practices by certification bodies and scheme providers;
- Weak and inconsistently applied enforcement levers;
- Unclear escalation routes and barriers to redress;
- Inconsistent auditing and assurance practices by certification bodies and scheme providers.

There are additional root causes that are not specifically described in this consultation but are important to understand and respond to. These include:

- **Scheme Design:** plays a critical role in setting up the incentives, targets and market forces that govern how retrofit is delivered. Those designing the new

consumer protection framework must not see scheme design as separate from this challenge but completely connected. Scheme issues, such as governance concerns and a focus on outputs (like number of measures installed), rather than outcomes (like improvements in a home's thermal performance or reduction in health hazards) have been explored in a number of papers including: Ewan Archer-Brown, Jan Rosenow, Throwing the baby out with the bathwater: the end of 32 years of UK Energy Efficiency Obligations, Energy Policy - <https://doi.org/10.1016/j.enpol.2026.115338>. Lessons should be taken from successful schemes, such as the Welsh Optimised Retrofit Programme, which measure real-world home performance improvements, and outcomes such as jobs created. The NRH's '*Measuring for Success?*' report (<https://nationalretrofitHub.org.uk/resources/measuring-outcomes-impact-evaluation-measuring-for-success/>) summarises what schemes target, what they report but don't measure, and what they actually measure. We have also explored how better outcomes targeting, measurement and reporting can be enabled through the project '*Measuring Outcomes & Impact Evaluation*' - <https://nationalretrofitHub.org.uk/projects/measuring-outcomes-impact-evaluation-moie/>;

- **Poor understanding of the retrofit system and wider construction sector:** our network raised concerns that civil servants may not have the deep systems understanding of how the retrofit system operates and interacts with the wider construction industry and other system such as Building Control. This can also lead to a false separation between retrofit and the rest of the construction industry;
- **Fragmented consumer offer:** with installers focusing on what they are able to offer customers, rather than thinking holistically about the right measures for the right homes.

CHAPTER 3: A CENTRALISED OVERSIGHT SYSTEM FOR GOVERNMENT-SUPPORTED RETROFIT SCHEMES

4. To what extent do you agree that consumer protection functions for all DESNZ-supported home upgrade schemes should be delivered through a single integrated end-to-end service?

Agree

Our network generally agree that a single integrated service would be beneficial, however, the following tensions and concerns will need to be considered:

- Our network had concerns that the government may not have the civil servant capacity, technical knowledge and understanding of the retrofit system to deliver this service or act as an effective client. In tension to this, the

consultation raises issues with misaligned commercial and financial incentives when parts of the system are delivered by the market. Therefore, the extent to which elements of this system are outsourced will need to be carefully considered.

- To meet the ambitious timelines proposed, design of the service will need to balance bringing together elements of the system that already work well, or have made significant positive steps to improve, so that institutional knowledge, processes and data are not lost, while also not simply becoming an umbrella over the current system, flaws and all.
- Given the move towards devolution, the potential for local and combined authorities to play a valuable role in this system, given their local knowledge, expertise and public mission, should be explored. These bodies will need to be adequately resourced, and national standards and processes set to enable consistency of working across the UK (including devolved nations).
- The scheme will need to balance standardisation (for scale, quality and simplicity) and the bespoke, contextual nature of good retrofit needed to meet the right outcomes for customers. The service will need to be flexible enough to work across schemes, technologies, funding routes, and markets.

5. Should DESNZ and the Warm Homes Agency be directly responsible for delivering any specific functions to safeguard consumer protections?

We agree that DESNZ should provide information, a point of contact for escalation, and industry coordination.

The consultation proposes that the integrated service will be responsible for “provision of advice.” While we agree that the service should provide standardised information – such as on the retrofit process, who to engage with, and how to access redress, advice should always be bespoke and impartial. Advice on the right measures and interventions for a home should be made by a professional who has knowledge of that specific home. Advice provision would also be more beneficial where it can be combined with other support, such as on fuel poverty, energy debt, the use of smart tariffs and health referrals. The consultation acknowledges the critical role that local non-profit and third sector advice providers play, and we ask that these organisations, including One Stop Shops, are: seen as critical infrastructure for advising and supporting householders; resourced adequately; and engaged and connected with the WHA (potentially through regional coordination via the Net Zero Hubs). The NRH have convened advice providers in the South West of England to understand their insights and views, and prepare a response to the WHP, available here: <https://nationalretrofitHub.org.uk/resources/south-west-net-zero-hub-and-the-south-west-region-energy-advice-providers-forum-response-to-the-warm-homes-plan/>.

We also support the proposal for an integrated data infrastructure and ask that this system:

- Enable access to data for those who need it;

- Be interoperable and integrated with other data sources;
- Have a consistent format that can be adopted by other data sources / providers, to enable, eg: Digital Building Logbooks;
- Enable learning from schemes and assessment of outcomes;
- Integrate real-world performance data.

6. What would be the main advantages or disadvantages of delivering through a single service provider versus multiple service providers?

Our network felt that the single service provider would be beneficial, but how we get to this point is critical.

Set-up of a single service provider will take time, and considering the ambitious timescales outlined in the consultation, there will be elements of the existing system that must be kept and integrated, rather than starting from scratch. The transition between the current system and this new provider should be well planned to avoid delays and disruptions to existing and forthcoming schemes and retrofit delivery.

9. Do you agree with the proposed scope of schemes which would be covered on a mandatory basis by the consumer protection system?

No

We disagree with the premise of designing a consumer protection system for grant funded schemes, then considering potentially opening this to works funded in other ways. The system should be designed to work across the whole home upgrade sector, with grant funded schemes being one part of this. We currently see the home upgrade market as loosely operating across three sectors that do not reinforce one another:

1. Businesses delivering grant funded works: with the certifications needed to deliver on grant schemes, and experience operating with standards. These businesses are vulnerable to the stop-start nature of funding cycles, and often do not cross into privately funded work, as there is a perception they deliver at a higher cost and processes in this sector are different.
2. Retrofit experts and One Stop Shops: offering a high-quality service for a small volume of clients in the able-to-pay and able-to-fund space. Delivering quality work, and able to engage in area-based projects where additional locally-led funding is available, but struggling to scale across the whole market.
3. Repair, Maintenance and Improvement: known and trusted builders working locally on extensions, refurbishment, kitchens and bathrooms. Often with a limited knowledge of retrofit and decarbonisation, or a reluctance to take on the additional risk and recommend this work.

Instead, we would like to see a system that enables the integration of these sectors into a 'Home Upgrade Sector' that is certified, competent, known and trusted,

providing good service and quality no matter your tenure or funding route. With a greater capacity to engage with area-based, mixed finance and community-led projects. This sector would reinforce itself, with government grant funding building businesses that can then deliver for the able-to-pay and PRS sectors, as the requirements, systems and processes will be the same. Existing RMI builders will be able to recommend retrofit works, and utilise 'trigger-points' during existing projects, as they will be confident and competent to do so.

A system that does not cover the PRS market, while MEES is being upgraded, also presents significant risk. It is crucial that good quality assurance and consumer protections are available and used in this sector, given the increased relational complexity (tenants will be dis-benefited by poor quality work paid for by their landlord), and the rate and which upgrades in this sector will be conducted over the next 5 years. The NRH report 'Improving health and housing outcomes in the private rental sector' includes a section with recommendations on 'high quality work and effective redress routes' (<https://nationalretrofitHub.org.uk/resources/minimum-energy-efficiency-standards-and-a-pathway-to-affordable-healthy-and-robust-homes/>).

10. Do you agree some elements of the reformed consumer protection system should also be available to the wider market on a voluntary basis?

As discussed above, the consumer protection system should be designed to work for the whole market, from the start. This means a balance will need to be struck between prescriptive standards, and flexibility for experts to innovate and design solutions bespoke to resident needs.

The system is unlikely to be initially 'mandated' across the whole market, but all installers and designers should be incentivised to certify, and information and marketing provided to consumers to explain the benefits of working with professionals who comply with the system.

CHAPTER 4: SIMPLIFYING AND IMPROVING THE CONSUMER JOURNEY FOR RETROFIT PROJECTS

11. To what extent do you agree that the proposed consumer journey would be clear and easy for consumers and installers to navigate?

Neither agree nor disagree

The customer journey should be informed by, and link to, how the existing RMI customer journey works, so that this process can be applied and adopted by the whole Home Upgrade Sector. We would like to see better alignment with existing processes, such as building regulations and the RIBA plan of work, rather than the creation of a

new, and artificially segregated, process. The journey must be flexible enough to incorporate both deep, lighter and phased retrofit work.

Specific feedback on the proposed consumer protection journey that we received includes:

- Information and advice should be differentiated, with advice being context-specific and bespoke;
- Identifying the intended outcomes, informed by householder and building need, and planning how these will be delivered, measured and evaluated, should be a critical element of the first steps;
- Retrofit assessment and design should be separated;
- Support for steps 5 and 6 on completion and after installation, to help shift towards a culture of ongoing support, advice, maintenance and servicing. Including the measurement, collection and evaluation of real-world performance data and feedback loops would strengthen the system.

Our network commented that One Stop Shops are missing from the proposals, and they can fill a critical gap - between generic information and 'the market', providing 'hand-holding' support, guiding householders through the process and customer advocacy.

13. What, if any, changes would improve how the system works for vulnerable consumers? Please share examples of the type of advice, support, referral mechanism and/or engagement models which are already effective in supporting vulnerable consumers.

Our network was clear that vulnerable customers need tailored, holistic, in-person advice and wrap-around support that takes into account their specific needs, and also connects with adjacent services. Providers such as CSE, National Energy Foundation and Citizen's Advice, already provide good-quality, comprehensive support for these citizens, and the third sector should be resourced to ensure this support is available to all who need it. Supporting bodies can also play an important advocacy role between the customer and installer.

Low income and vulnerable citizens in particular will be impacted by any risk of increased bills, and therefore, particularly when considering a change to a heating system, they will need high-quality design, installation and commissioning, training on how to use and operate equipment, and checks within at least the first year.

Performance and comfort guarantees could play an important role in mitigating risk for these people. The NRH explore the risk of heat pump in-affordability, and how this can be mitigated through good system design and support, in this article -

<https://nationalretrofitHub.org.uk/news/a-people-centred-approach-to-heat-decarbonisation-strategy/>.

It is not just low income and vulnerable consumers who need process support and advice when upgrading their home – all citizens will need some level of support, and they should be able to access the right support for them.

CHAPTER 5: STRENGTHENING TECHNICAL AND PROFESSIONAL FRAMEWORKS

16. What changes to standards, frameworks or associated guidance would most improve the clarity, consistency and practical application of competence requirements for retrofit professionals? Please provide examples where possible.

The scope of roles covered in this consultation is too narrow:

- Those providing retrofit advice, one stop shops and those supporting vulnerable customers are missing but crucial;
- Existing trades and the current RMI sector should be in scope, and a system designed that can work with this existing market.

The benefits of certification should be made clear to professionals, installers and consumers, particularly when it is unlikely the system will be mandated for the whole sector. SMEs can face challenges in engaging with technical standards and scheme documents, providing a barrier to conducting retrofit work. Support should be provided, including best-practice guidance for contractors to help build confidence and competence.

Professionals and installers should be required to provide ongoing support after measures are installed, as part of a culture shift towards long-term maintenance and ensuring good in-use performance. We support the proposal that competence standards should include required behaviours – to ensure professionals and installers act in the best interests of building occupants.

Opinion varies on whether Retrofit Coordinators should be independent of contractors, with many suggesting that independence is needed ensure coordinators play an effective role in quality assurance, with other proposing that a stronger contractual accountability link between the performance of the coordinator and their employer could help. Many raised concerns that coordinators enter courses without meeting entry requirements and leave courses with little site experience or ability to fulfil the role.

17. Which approaches would be most effective for strengthening oversight of installers and retrofit professionals? Select all that apply.

The three approaches our network suggested would be most effective were: Stronger audit requirements; Public register of professionals; and Clear competence frameworks.

The public register of professionals and installers would be useful for many, including local authorities and advice providers who do not have the capacity or liability cover to put together their own lists. We regularly hear that customers and organisations procuring retrofit do not know where to turn. Some use existing registers such as the FMB and AECB member directories, however these still rely on the customer narrowing down to those with retrofit experience and competence. The register needs to be underpinned by strong standards and audit processes, and the industry would like to see more detail on this process, to ensure the list can be trusted.

19. What expectations and requirements should apply to certification bodies to help prevent poor-quality or non-compliant work? Please include views on audit activities, expertise, data sharing and links with self-certification schemes and building control.

For-profit certification bodies can face misaligned market incentives – they are paid by the businesses they certify, disincentivising enforcement action and removals from their registers. Non-profit, profit for purpose, or other third sector models should be explored, to limit this market dis-incentive. The role for certification bodies could be more clearly defined, and the WHA more prescriptive about the audits that are conducted. There is an option to centralise the certification process, with the WHA acting as client, deciding who to audit, and certification bodies becoming service providers, conducting the numbers and types of audits specified.

While the consultation proposes more clearly defining scheme requirements, it is worth noting that ISO/IEC 17065 is the existing standard certification bodies should meet. Enforcement of this standard should be strengthened.

We would support data-sharing between certification and other bodies (such as Trustmark), and improved abilities for suspension from one body to lead to suspensions with others.

CHAPTER 6: EARLIER DETECTION AND STRONGER ENFORCEMENT PROCESSES

20. To what extent do you agree that an intelligence-led risk-based approach to audit and assurance would improve system performance?

One risk of the intelligence-led risk-based approach is that this may catch issues associated with historic energy efficiency schemes, but new risks created by new scheme design and governance may be missed. Continuous data collection, engagement with local delivery organisations, and strong feedback loops will be required to identify new risk sources.

We agree that audits should go beyond checklist-based compliance – some in our network expressed concerns that the checklist system currently utilised in Ireland has limitations and may not account for context, novel approaches or bespoke design.

Auditors need to be skilled and competent enough to evaluate design and installation holistically.

Remote monitoring of performance should play a stronger role in quality assurance, not only helping identify underperformance, but also issues which may be associated with poorly performing installs. Heat pump performance, SMETERS and indoor air quality measurements could all play an effective role, depending on the outcomes targeted by the interventions, and household needs. Some also suggested that group average performance levels for installers could be used as a pre-qualification requirement to deliver grant funded work. More information on setting, measuring and achieving the right outcomes in retrofit can be found in the NRH report 'Health, Place and Retrofit' - <https://nationalretrofit.org.uk/resources/health-place-and-retrofit-findings-and-recommendations-for-change/>.

Once again, the role for local and combined authorities to support audit and assurance should be explored, particularly whether experienced and competent Retrofit Coordinators within local authorities could support place-based and locally delivered schemes. We understand that quality within SHDF / WH:SHF has been higher than in ECO, with experienced and dedicated local authority officers play a fundamental role in ensuring quality.

21. To what extent do you think the proposed graduated compliance model would provide an appropriate level of deterrence?

The graduated model makes logical sense and provides a balance between ensuring quality and keeping installers and professionals, who have good intentions and the ability to improve, within the sector. Tools and support for early-stage installers, such as pre-suitability assessments and accompanied audits, could be useful to build scale, confidence and competence in the industry.

Catching issues upstream, before completion will improve trust, value and workforce competence, therefore early assessments and audits could play a valuable role. Lessons should be taken from Scotland's developing HEETSA (Heat and Energy Efficiency Technical Suitability Assessment) methodology, which helps identify the right measures for homes.

CHAPTER 7: SWIFT REMEDIATION AND REDRESS

26. To what extent do you agree with the proposal to centralise responsibility for redress under the consumer protection service?

Strongly Agree

We agree that centralised responsibility for redress is fundamental to improving the customer journey, rebuilding trust and ensuring the system works fairly for all. We do not agree with the principle that "wherever possible, problems should be put right by those who caused them", as some customers will, understandably, not be happy for an installer who did poor quality work to remediate. We heard anecdotal evidence that

some clients paid for remediation for ECO and GBIS work, as they did not want the same contractor to be used again. The customer should have a choice, but the costs paid by the original installer.

Those designing the redress scheme should learn from lessons experienced during the current Find and Fix process.

27. Which additional consumer protection issues should fall within the scope of redress system arrangements? Select all that apply.

Our network felt that all additional issues should be included within the redress scheme, and of particular importance were: Damage to the wider building fabric, caused by faulty installation; and Lack of contract clarity and fairness: including unclear or inadequate pre-contract information, warranties and guarantees.