Reforming Consumer Protection for Home Upgrade Schemes – Consultation

Responses from AgilityEco

Executive summary

AgilityEco welcomes the Government's commitment to strengthening consumer protection under the Warm Homes Plan. A trusted framework is fundamental to building consumer confidence, driving participation and supporting long-term growth in the retrofit market.

We believe three principles should underpin the final design of the new consumer protection framework:

1. **Prevention over cure.** The system should prioritise stopping problems before they arise, not just handling complaints after the fact. This means stronger governance, clearer accountability across the delivery chain, earlier risk identification and more consistent quality assurance.

2. **Clear division of roles.** The proposed Consumer Protection Service should be the single point of contact for consumers, coordinating case management and remediation. But interpreting technical standards, including PAS 2035 and Building Regulations compliance, should sit with one authoritative technical body within the wider regulatory framework.

3. **Organisational capability, not just individual competence.** Raising installer competence requirements is welcome, but successful delivery equally depends on organisational capability: governance, quality management, financial resilience, supply chain oversight and continuous improvement.

We encourage DESNZ to consider requiring independently audited organisational capability, alongside technical compliance, as a condition of participation in publicly funded retrofit schemes.

Our responses draw on our experience delivering energy efficiency and fuel poverty programmes with local authorities, energy suppliers and public sector partners, experience that shows consumer protection depends on robust national standards paired with effective, locally-attuned delivery.

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Chapter 1: The case for change

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

[YES]

AgilityEco broadly agrees with the Government's assessment that the existing consumer protection landscape has become fragmented and that reform is necessary to rebuild consumer confidence as delivery of the Warm Homes Plan scales.

However, we would like to see a greater emphasis placed on the underlying governance issues that have contributed to poor consumer outcomes across previous government-supported retrofit programmes. Whilst weaknesses in consumer protection arrangements have undoubtedly played a role, many of the issues experienced under schemes such as ECO4 and the Great British Insulation Scheme have been symptomatic of broader system governance challenges rather than shortcomings in consumer protection mechanisms alone.

Our delivery experience has found that, consumer detriment has often arisen from fragmented accountability across multiple organisations, inconsistent interpretation of technical standards, varying approaches to quality assurance and unclear ownership of compliance and remediation responsibilities.

Commercial incentives have also, in some cases, encouraged a focus on delivery volumes rather than consistently high-quality consumer outcomes. These structural issues can create uncertainty for consumers and delivery organisations alike, particularly where responsibility for resolving defects becomes contested.

The reforms should remain focused on preventing poor outcomes through stronger governance, earlier intervention and clearer accountability across the delivery chain, rather than concentrating primarily on improving processes once problems have already occurred.

Question 2: To what extent do you think the proposed reforms would improve consumer protection outcomes in home upgrade schemes?

[Strongly improve]

The proposals have the potential to significantly improve consumer protection outcomes by creating a simpler, more coherent and more accountable framework for government-supported home energy upgrades.

We particularly support the ambition to establish clearer oversight arrangements, improve coordination across the consumer journey, strengthen quality assurance and create more consistent routes to redress. These measures can reduce fragmentation and provide greater certainty for households considering investment in home energy improvements.

We also welcome the emphasis on creating a more integrated system that enables Government to monitor performance more effectively and intervene earlier where problems arise.

There are three further reforms that should be considered, too.

First, the framework should place greater emphasis on preventing failures rather than relying predominantly on improved complaints handling and remediation after installation.

Secondly, technical interpretation of PAS 2035 and Building Regulations should be clearly separated from consumer case management. A single authoritative technical body should provide consistent decisions on compliance, while the Consumer Protection Service should focus on coordinating support for consumers and ensuring timely resolution.

Thirdly, Government should recognise that organisational capability is just as important as individual technical competence. Organisations delivering publicly funded retrofit should demonstrate robust governance, quality management, consumer protection processes and financial resilience alongside technical compliance. This would strengthen confidence that delivery partners possess the operational capability required to consistently deliver positive consumer outcomes.

Subject to these considerations, we believe the proposed reforms represent a significant opportunity to establish a consumer protection framework that is capable of supporting the long-term ambitions of the Warm Homes Plan.

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Chapter 2: Aligning the Consumer Protection System with Building Oversight

Question 3: What are the main challenges in aligning the future consumer protection system with the reformed building oversight regime and, if applicable, how would you address them?

One of the principal challenges will be ensuring that the new consumer protection framework complements, rather than duplicates, the wider building regulatory system. AgilityEco supports the Government's ambition to better align retrofit with existing building oversight arrangements and agrees there is limited value in establishing another standalone regulatory or enforcement body. Instead, the reforms should simplify the governance landscape and provide greater clarity over who is responsible for interpreting standards, overseeing compliance and resolving disputes.

Our experience suggests that one of the most significant challenges under current government-supported retrofit schemes has been the existence of multiple organisations with overlapping responsibilities for interpreting technical requirements. Differing interpretations of PAS 2035, Building Regulations and associated scheme requirements can arise between TrustMark, self-certification schemes, certification bodies and other assurance organisations. This can create uncertainty for installers, inconsistent audit outcomes and delays in resolving consumer complaints.

To address this, we believe Government should establish a single authoritative route for interpreting technical compliance. Where PAS 2035 remains the recognised framework for domestic retrofit, responsibility for determining whether work complies with technical standards should sit within the wider building regulatory framework, or another clearly designated technical authority, rather than being distributed across multiple assurance organisations.

This would create greater consistency for consumers and delivery organisations alike, ensuring that technical decisions are made independently of complaint handling and enforcement activity.
Clearer governance should also extend to responsibility for remedial action. Once a technical determination has been reached, ownership of enforcement and remediation should be unambiguous, with clearly defined responsibilities for delivery organisations, oversight bodies and Government where appropriate. This would help reduce delays and improve confidence that issues will be resolved consistently.

Ultimately, successful alignment should simplify the system from the perspective of both consumers and industry. A governance framework that provides one authoritative interpretation of compliance will strengthen confidence whilst avoiding the complexity that has characterised previous retrofit programmes.

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Chapter 3: A Single Consumer Protection Service

Question 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?

[Strongly agree]

AgilityEco strongly supports the principle of establishing a single integrated Consumer Protection Service covering all DESNZ-supported home upgrade schemes.

The current consumer protection landscape has evolved over time, resulting in multiple organisations performing overlapping roles across advice, quality assurance, complaints handling, guarantees and redress. This complexity can make it difficult for consumers to understand where to seek support, particularly where issues span multiple organisations or stages of the retrofit journey.

A single, integrated service should provide a simpler and more accessible experience by offering one recognised point of contact throughout the customer journey. Bringing together impartial advice, case management, quality assurance coordination and consumer support within a single framework should significantly reduce fragmentation whilst improving consistency across all Government-funded programmes (funded, subsidised loans and innovative finance products).

However, we believe the success of this model will depend on maintaining a clear distinction between consumer coordination and technical decision-making. The Consumer Protection Service should coordinate support, manage cases and ensure consumers receive timely resolution, but it should not become responsible for interpreting technical standards or determining compliance with PAS 2035 or Building Regulations. Those decisions should rest with a single authoritative technical body, ensuring consistency across the sector and avoiding conflicting interpretations.

If implemented in this way, a single Consumer Protection Service has the potential to simplify delivery and provide Government with a much stronger evidence base for monitoring performance across the Warm Homes Plan.

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

[Yes]

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AgilityEco believes DESNZ and the Warm Homes Agency should retain strategic responsibility for the overall consumer protection framework, whilst avoiding duplication of functions better delivered by independent technical bodies or specialist delivery organisations.

Government's primary role should be to establish the framework within which consumer protection operates. This should include setting minimum standards, overseeing performance, monitoring outcomes, ensuring consistent application of policy and holding the wider system to account.

The Warm Homes Agency should also be responsible for ensuring that appropriate enforcement action is taken once technical determinations have been made and that consumers receive timely remediation where failings have been identified.

However, we do not believe DESNZ. or the Warm Homes Agency should become responsible for interpreting technical standards or adjudicating compliance with PAS 2035 or Building Regulations. These functions should remain independent and sit with a single authoritative technical body to ensure consistent interpretation across the sector.

Beyond enforcement, Government should also recognise that existing mechanisms will not always deliver satisfactory consumer outcomes. There will inevitably be circumstances where installers have ceased trading, liability cannot be established or financial protection arrangements prove insufficient to fund remedial work. Consumers should not be left without recourse in these situations.

We therefore encourage DESNZ to consider establishing a supplier of last resort, or equivalent consumer protection fund, capable of ensuring necessary remediation can still be delivered once all other avenues have been exhausted. Such a mechanism would provide an important safety net whilst reinforcing confidence in Government-supported retrofit programmes.

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

A single service provider offers significant advantages in terms of consistency, accountability and simplicity for consumers. A single point of contact throughout the retrofit journey would make it easier for households to access advice, understand their rights and obtain support where problems arise. It would also reduce duplication between existing organisations and provide Government with a more consistent evidence base for monitoring performance.

From a delivery perspective, an integrated model should enable more effective sharing of information, clearer escalation routes and stronger oversight of systemic issues affecting quality or consumer experience.

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However, centralisation should not result in excessive concentration of responsibility or the loss of specialist expertise. The Consumer Protection Service should coordinate activity rather than attempting to perform every function itself. Technical compliance, for example, should continue to be determined by an independent technical authority, whilst specialist organisations may remain best placed to deliver particular elements of quality assurance or dispute resolution.

Similarly, the model should recognise the importance of local delivery. Consumers often benefit most from organisations that understand local housing stock, existing partnerships and community needs. A nationally consistent framework should therefore be capable of supporting locally delivered services where this improves consumer engagement and outcomes.

In our view, the most effective model is therefore neither a fully centralised nor a fully fragmented system, but one in which a single Consumer Protection Service provides national coordination, governance and accountability whilst drawing upon specialist technical expertise and locally embedded delivery partners where appropriate.

Question 7: To what extent do you think the proposed service, under DESNZ oversight, would reduce fragmentation in the current system?

[To a large extent]

AgilityEco believes the proposed Consumer Protection Service would significantly reduce fragmentation across Government-supported retrofit programmes.

The current system requires consumers and delivery organisations to navigate multiple organisations responsible for different aspects of advice, certification, quality assurance, guarantees and complaints. This can create uncertainty regarding responsibilities and delay resolution where issues involve more than one organisation.

A single service should simplify the consumer journey by providing one recognised point of contact throughout the lifecycle of an installation. It should also improve transparency, enable more consistent communication and allow systemic issues to be identified more quickly through integrated data and performance monitoring.

However, reducing fragmentation will depend not simply on creating another organisation, but on clearly defining responsibilities across the wider governance framework. To avoid recreating existing complexity, there should be clear separation between policy oversight, consumer coordination, technical determination and enforcement.

If roles and responsibilities are clearly defined, we believe the proposed model represents a significant opportunity to establish a more coherent and accountable consumer protection system capable of supporting the long-term ambitions of the Warm Homes Plan.

Question 8: What data and performance information is most important for monitoring the effectiveness of the system?

AgilityEco believes the effectiveness of the proposed framework will depend upon integrating data across the entire consumer journey rather than monitoring individual stages in isolation.

We therefore support collecting and analysing data across all of the categories identified in the consultation. In particular, we consider the following to be essential:

- we encourage DESNZ to extend performance monitoring beyond technical compliance alone. Consumer confidence is influenced by the entire delivery experience, including communication, expectations management, vulnerability support and aftercare.

  The proposed framework should therefore include measures relating to consumer satisfaction, first-time resolution, repeat defects, complaint recurrence, timeliness of remediation and organisational performance over time.

- Importantly, data should be used proactively rather than retrospectively. Integrated intelligence should enable emerging risks to be identified early, allowing regulatory intervention before consumer detriment becomes widespread.

- Sharing anonymised learnings across the sector would also support continuous improvement and help prevent common issues recurring across multiple delivery organisations.

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

[Yes]

AgilityEco supports the proposed mandatory scope but believes the framework should ultimately extend across all Government-backed retrofit delivered under the Warm Homes Plan, regardless of the funding mechanism.

From a consumer perspective, there is little distinction between grant-funded installations, subsidised finance products or other Government-supported delivery models. Consumers should reasonably expect the same standards of protection, oversight and access to redress irrespective of how improvements are funded.

Applying different consumer protection arrangements across different funding mechanisms risks recreating the complexity and inconsistency that these reforms seek to eliminate. It may also reduce consumer confidence in emerging finance models that Government wishes to encourage within the able-to-pay market.

A single consumer protection framework applying consistently across all publicly supported retrofit would provide greater clarity for consumers, greater certainty for delivery partners and a more coherent basis for performance across the Warm Homes Plan as a whole.

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

[Yes]

AgilityEco supports making elements of the reformed framework available to the wider retrofit market on a voluntary basis.

A voluntary pathway would enable organisations operating outside Government-funded schemes to adopt recognised standards of consumer protection, helping to improve consistency across the wider market and increasing consumer confidence irrespective of funding source.

Over time, greater alignment between publicly funded and privately funded retrofit could reduce complexity for installers, consumers and finance providers by creating a more consistent set of expectations across the sector.

However, participation should continue to be subject to appropriate governance and oversight. Organisations choosing to participate voluntarily should be expected to meet the same standards of consumer protection, organisational capability and accountability as those delivering Government-supported schemes. This will help ensure that participation in the framework remains a meaningful signal of quality and consumer confidence rather than simply a badge of membership.

Chapter 5: Strengthening Standards, Competence and Oversight

Question 15: To what extent do you think the proposed changes to oversight of standards and new competence frameworks would improve installation quality, including for multi-measure installations?

[To a large extent]

AgilityEco strongly supports the proposals to strengthen installer certification, introduce clearer competence requirements for retrofit professionals and increase accountability for certification bodies. We welcome the proposal that participation in DESNZ-supported schemes should be conditional upon installers, retrofit professionals and their respective oversight bodies consistently demonstrating high standards of competence, compliance and performance.

These reforms represent an important step towards creating a more consistent and accountable quality assurance framework. Greater clarity around roles, responsibilities and competence expectations should improve confidence across the sector whilst helping to ensure that installations are delivered in accordance with recognised technical standards.

The proposals are particularly important for multi-measure retrofit, where successful delivery depends upon effective coordination across several disciplines and a thorough understanding of how measures interact with the wider building fabric. Clearer competence frameworks should help reduce the risk of fragmented delivery and improve whole-house outcomes.

However, whilst strengthening technical competence is essential, it should not be regarded as sufficient in isolation. In our experience, installation quality is influenced not only by the capability of individual professionals but also by the governance, management systems and operational controls of the organisations responsible for delivering retrofit programmes. Weak organisational processes can undermine otherwise technically competent delivery teams.

We therefore encourage DESNZ to view competence as one component of a wider assurance framework that also evaluates organisational capability, governance and consumer protection processes. This would provide greater confidence that organisations can consistently deliver high-quality outcomes at scale throughout the lifetime of the Warm Homes Plan.

Question 16: What changes to standards, frameworks or associated guidance would most improve the clarity, consistency and practical application of competence requirements for retrofit professionals?

Greater consistency will require more than clearer technical guidance. It will also require greater consistency in how standards are interpreted and applied across the various organisations responsible for assurance and compliance.

As noted earlier in this response, differing interpretations of PAS 2035 and associated requirements can create uncertainty for installers and delivery organisations. We therefore support clearer national guidance and a single authoritative approach to interpreting technical standards.

Alongside this, we believe Government has an opportunity to broaden its approach to assurance by recognising organisational capability alongside individual competence.

Delivering successful retrofit programmes requires organisations to demonstrate robust governance, effective quality management systems, appropriate consumer protection arrangements, strong supply chain management and financial resilience. These organisational capabilities play a significant role in determining whether technically compliant installations consistently translate into positive consumer outcomes.

We therefore encourage DESNZ to consider whether organisations participating in publicly funded retrofit schemes should be required to demonstrate independently audited organisational capability in addition to compliance with technical competence requirements. Such an assessment could include governance arrangements, complaints handling, vulnerability processes, quality assurance systems, operational controls and arrangements for continuous improvement.

This would strengthen confidence that organisations possess not only the technical capability to undertake retrofit work but also the organisational maturity required to deliver programmes consistently and responsibly over the long term.

Question 17: Which approaches would be most effective for strengthening oversight of installers and retrofit professionals?

Selected options:

- Stronger audit requirements
- Clearer competence frameworks
- Stronger role for certification bodies
- Greater Government oversight
- Other - Organisational assurance

AgilityEco supports each of the measures proposed in the consultation, recognising that effective oversight requires multiple complementary mechanisms rather than reliance on any single intervention.

Clearer competence frameworks and stronger audit requirements should improve consistency and provide greater confidence that technical standards are being met. Likewise, a strengthened role for certification bodies, supported by clearer accountability to Government, should improve the effectiveness of ongoing oversight. However, we believe an important element is currently missing from the proposed framework: independent assessment of organisational capability.

Whilst existing assurance arrangements focus primarily on technical competence and compliance, many of the issues experienced in previous retrofit programmes have arisen from weaknesses in organisational governance, programme management, consumer engagement, supply chain oversight and operational processes.

Government should therefore consider introducing organisational assurance as an additional requirement for participation in publicly funded retrofit schemes. This could be independently assessed against a consistent framework covering governance, quality management, consumer protection, financial resilience, operational controls and continuous improvement.

Question 19: What expectations and requirements should apply to certification bodies to help prevent poor-quality or non-compliant work?

We support DESNZ's proposal to strengthen oversight of certification bodies through formal agreements and clearer performance expectations. In doing so, the framework should be based on the principle of being locally embedded, but nationally consistent.

Certification bodies should have a strong understanding of the local context in which retrofit is delivered. This includes local housing characteristics, building types, regional supply chains, skills availability and the practical challenges faced by installers and consumers. Local knowledge can help certification bodies identify risks and support effective, proportionate assurance.

However, local responsiveness should not result in different interpretations or application of national standards. Consumers and installers should be able to expect the same fundamental standards of quality, compliance and assurance regardless of where they are located in the country.

Greater consistency between certification bodies is essential. Divergent interpretations of technical standards, or different approaches to auditing and enforcement, can create uncertainty for installers, delay remediation and undermine confidence in the wider assurance system. Nationally agreed requirements and guidance should therefore provide a clear baseline for certification, while allowing certification bodies sufficient flexibility to respond to local circumstances.

We also believe certification bodies should themselves be subject to regular and independent performance review against transparent national criteria. This should include assessment of audit quality, consistency of decision-making, identification and management of non-compliance, responsiveness and contribution to wider system improvement. Performance information and learning should be shared across the sector so that good practice identified locally can inform national improvement.

A locally embedded approach should therefore complement, rather than dilute, national consistency. Certification bodies should be close enough to the market to understand local risks and delivery realities, while operating within a clear national framework that provides consistent expectations, standards and outcomes.

Ultimately, certification bodies should not simply assess compliance at a point in time. They should contribute to raising standards across the sector through locally informed but nationally consistent oversight, effective auditing, robust follow-up of non-compliance, data sharing and continuous learning. This approach would help ensure that certification provides meaningful and reliable assurance of quality and compliance wherever retrofit is delivered.

Chapter 6: Audit, Compliance and Enforcement

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

[Agree]

AgilityEco supports the principle of an intelligence-led, risk-based approach to audit and assurance. Better use of integrated data should enable oversight bodies to identify emerging risks earlier, target regulatory effort more effectively and reduce unnecessary burdens on organisations demonstrating consistently high levels of performance.

However, risk-based assurance is not a new concept. Previous government-supported retrofit programmes have also sought to adopt risk-based approaches, yet significant quality issues and consumer detriment have still occurred.

This suggests that whilst intelligence-led regulation is necessary, it is not sufficient on its own.
We therefore encourage DESNZ to combine risk-based supervision with stronger controls on market entry and greater emphasis on organisational assurance. Preventing organisations with weak governance or inadequate operational capability from entering publicly funded schemes is likely to deliver greater long-term benefits than relying predominantly on identifying poor performance after delivery has commenced.

Risk indicators should include not only technical audit outcomes but also complaint trends, remediation times, guarantee claims, organisational governance indicators, financial resilience, supply chain performance and recurring consumer issues.

The framework should also support continuous learning, enabling data to identify systemic issues and inform improvements across the wider sector rather than simply triggering enforcement activity.

Question 22: What arrangements would best ensure that installers cannot avoid remediation responsibilities, including by leaving oversight bodies or dissolving companies?

Consumers should not lose access to remediation simply because an installer has ceased trading, left an oversight scheme or is otherwise unable to fulfil its obligations. We therefore support a layered approach to consumer protection.

In the first instance, installers should remain responsible for rectifying defective work wherever possible, supported by robust contractual arrangements and effective oversight. Where this is not possible, consumers should have access to insurance-backed guarantees that meet consistent minimum standards for scope of cover, exclusions, claims handling and provider resilience.

However, Government should recognise that these mechanisms will not always provide complete protection. Organisations may become insolvent, liability may remain disputed or guarantee arrangements may prove insufficient.

For this reason, we encourage DESNZ to consider establishing a supplier of last resort, or equivalent remediation fund, capable of ensuring that necessary remedial works are completed once all other mechanisms have been exhausted.

Question 23: What additional measures (if any) would improve enforcement and compliance?

Alongside the measures proposed in the consultation, we believe the greatest opportunity lies in strengthening prevention rather than enforcement alone.

Government should consider introducing independently audited organisational assurance as a condition of participation in publicly funded retrofit schemes.

Such a framework would assess organisational governance, quality management, consumer protection processes, vulnerability arrangements, supply chain oversight, financial resilience and arrangements for continuous improvement.

Whilst higher entry requirements may reduce the number of participating organisations initially, they should also reduce the likelihood of poor-quality delivery, lessen the need for regulatory intervention and improve confidence in the sector over time.

We also encourage DESNZ to ensure that intelligence-led oversight applies across the entire retrofit delivery chain. Consumer detriment does not arise solely from installation defects but can originate during assessment, design, coordination, programme management or quality assurance. Effective regulation should therefore identify risks wherever they occur rather than focusing exclusively on installers.

Ultimately, enforcement will be most effective when combined with robust market entry requirements, strong organisational capability and continuous monitoring. A framework that prevents poor performance will deliver better outcomes than one that relies primarily on identifying and sanctioning failure after it has occurred.

Chapter 7: Redress and Financial Protection

Question 26: To what extent do you agree with the proposal to centralise responsibility for redress under the Consumer Protection Service?

[Strongly agree]

AgilityEco strongly supports the proposal to centralise responsibility for consumer redress within a single Consumer Protection Service. A centralised approach should make the system considerably easier for consumers to navigate by providing a clear point of contact throughout the complaints and remediation process, reducing uncertainty about where responsibility lies and improving the consistency of outcomes.

We also welcome the proposed emphasis on coordinated case management. In many existing schemes, consumers are required to engage with multiple organisations responsible for different aspects of complaints, technical assessment, guarantees and enforcement. This fragmentation can delay resolution and undermine confidence in both the scheme and the wider retrofit market.

However, whilst the proposed framework significantly strengthens complaint handling, we believe equal emphasis should be placed on ensuring that consumers consistently receive effective remediation, regardless of the circumstances of the organisations involved. Enforcement action, Ombudsman decisions and insurance-backed guarantees will not always result in defective work being rectified, particularly where organisations have ceased trading, liability is disputed or existing financial protections prove insufficient.

For this reason, we encourage DESNZ to ensure that the Consumer Protection Service is supported by robust arrangements that guarantee consumers are not left without recourse once all other mechanisms have been exhausted. Consumer confidence depends not only on effective complaint management but on confidence that issues will ultimately be resolved.

Question 27: Which additional consumer protection issues should fall within the scope of redress system arrangements?

Selected options:

- Poor practice in sales and marketing
- Cancellation and cooling-off rights
- Treatment of deposits and advance payments
- Financial and contractual arrangements
- Installer conduct
- Manufacturer and product obligations

- Impacts on wider building fabric

AgilityEco supports a broad scope for the proposed redress system. Consumer detriment can arise at any stage of the retrofit journey, from initial engagement through to post-installation support, and the framework should reflect this.

In particular, we believe poor sales practices, inadequate consumer information and unrealistic expectations can contribute significantly to later complaints. Effective consumer protection should therefore extend beyond technical installation quality to encompass the entire customer journey.

We also encourage DESNZ to recognise that some issues may arise from interactions between installed measures and the wider building fabric. Consumers should have access to a clear route to resolution where defects or unintended consequences emerge following installation.

Finally, the framework should distinguish clearly between technical determination and consumer resolution. Compliance with PAS 2035, Building Regulations and other technical standards should be determined by the appropriate technical authority. The Consumer Protection Service and Ombudsman should then focus on ensuring consumers receive fair, timely and effective resolution based upon those technical findings. Separating these functions will improve consistency, reduce conflicting interpretations and provide greater certainty for consumers and delivery organisations alike.

Question 28: Which features of the proposed redress system are most important for delivering effective outcomes?

Selected options:

- Central case management
- Use of guarantees and financial protections
- Access to an independent Ombudsman
- Defined escalation routes

AgilityEco supports all of the features identified in the consultation, recognising that effective redress depends upon a combination of clear governance, coordinated case management and appropriate financial protection.

Central case management should simplify the consumer experience by providing a single point of contact throughout the complaints process, whilst defined escalation routes will help ensure issues are resolved consistently and without unnecessary delay.

Access to an independent Ombudsman will provide important assurance that disputes can be resolved impartially where agreement cannot be reached through earlier stages of the process.

We also support the continued use of insurance-backed guarantees but believe there is an opportunity to strengthen the existing framework. Government should establish minimum requirements covering the scope of protection, permitted exclusions, claims handling, response times and the financial resilience of guarantee providers. This would ensure consumers receive a consistent baseline level of protection regardless of provider and increase confidence that guarantees will remain effective when they are needed.

Together, these measures should create a more robust and transparent redress framework that provides consumers with greater confidence throughout the retrofit journey.

Question 30: Should Government explore the creation of a solidarity fund to support consumers when other remediation routes are exhausted?

[Yes]

AgilityEco supports Government exploring the creation of a solidarity fund, or an equivalent supplier of last resort mechanism, to ensure consumers are protected when all other remediation routes have been exhausted.

Whilst the proposed reforms strengthen enforcement, guarantees and complaints handling, there will inevitably be circumstances where these mechanisms are unable to deliver an effective outcome. Installers may cease trading, organisations may become insolvent, liability may remain disputed or insurance-backed guarantees may prove insufficient to fund the necessary remedial work.

Consumers should not bear the consequences of these circumstances, particularly where work has been undertaken as part of a Government-supported programme.

A carefully designed fund should operate as a genuine mechanism of last resort, accessed only once all contractual, regulatory and insurance routes have been exhausted. This would preserve appropriate accountability within the supply chain whilst providing consumers with confidence that they will not be left without support because of circumstances beyond their control.

Alongside any such fund, Government should continue to strengthen the resilience of insurance-backed guarantee arrangements through consistent minimum standards and enhanced oversight of guarantee providers. Together, these measures would provide a comprehensive and proportionate safety net that reinforces confidence in the wider consumer protection framework.

Chapter 8: Market Impacts and Implementation

Question 31: What are the most significant impacts of the proposed reforms on installers, retrofit professionals and other market participants?

The proposed reforms represent a significant step towards creating a more consistent and accountable retrofit market. Whilst implementation will require investment across the sector, we believe the long-term benefits substantially outweigh the short-term challenges.

Higher standards, stronger assurance and clearer accountability may reduce the number of organisations able or willing to participate in Government-supported schemes during the early stages of implementation. However, we do not regard this as a negative outcome if it reflects a market increasingly comprised of organisations with the governance, capability and financial resilience required to deliver consistently positive consumer outcomes.

The Warm Homes Plan represents a long-term national programme rather than a short-term funding initiative. It should therefore be supported by organisations capable of sustained, high-quality delivery rather than those seeking to respond only to short-term commercial opportunities.

For retrofit professionals, clearer competence frameworks should improve consistency and increase confidence in professional standards across the sector. For installers and programme delivery organisations, greater clarity regarding expectations should support investment in people, systems and continuous improvement.

Ultimately, we believe the reforms present an opportunity to establish a more stable, professional and trusted market capable of supporting delivery of the Warm Homes Plan over the coming decades.

Question 32: To what extent do you think the proposed reforms would affect installer participation in Government-supported schemes?

[Decrease participation (in the short term)]

AgilityEco expects the proposed reforms may reduce installer participation in Government-supported schemes during the initial implementation period as standards, competence requirements and assurance expectations increase.

However, we do not believe this should be interpreted as a negative outcome. A reduction in participation is likely to reflect the removal of organisations that are unable or unwilling to meet higher standards rather than a weakening of the market itself.

Over the medium to long term, we expect participation to recover as organisations adapt to the new framework and invest in the governance, systems and capability required to operate successfully within it.

Importantly, a stable and predictable regulatory environment will encourage this investment. Organisations are far more likely to invest in workforce development, digital systems and quality management where they have confidence that the regulatory framework will remain consistent over time.

We therefore anticipate an initial period of market consolidation followed by sustainable long-term growth built upon higher standards and increased consumer confidence.

Question 33: What practical steps could reduce administrative burden in the reformed system?

Administrative burden should be reduced by simplifying governance rather than reducing assurance. Government should seek to minimise duplication between oversight bodies through clearer allocation of responsibilities, greater data sharing and a single approach to interpreting technical standards. Organisations should not be required to provide the same information repeatedly to multiple bodies operating within the same regulatory framework.

Digital integration will also be important. Greater interoperability between scheme management systems, certification bodies, building control and the Consumer Protection Service should reduce manual administration whilst improving the quality of regulatory intelligence.

Finally, a genuinely risk-based approach should ensure that organisations demonstrating consistently high performance are subject to proportionate levels of oversight, allowing regulatory effort to focus on areas of greatest risk without reducing consumer protection.

Question 34: What direct and indirect costs might arise from the proposed reforms for your organisation or others?

The reforms are likely to generate both direct and indirect costs during implementation. Organisations may need to invest in governance arrangements, quality management systems, staff training, digital systems, audit processes and strengthened consumer protection arrangements.

There may also be transitional costs associated with adapting to revised regulatory requirements and integrating with new oversight arrangements.

However, these costs should be considered alongside the significant costs currently associated with fragmented assurance, inconsistent standards, repeat inspections, remediation activity, complaints and dispute resolution.

A more coherent assurance framework should reduce these downstream costs over time by preventing poor-quality delivery and enabling earlier intervention where risks emerge.

From a whole-system perspective, we believe the reforms should improve value for money by reducing consumer detriment, increasing installation quality and creating greater confidence in Government-supported retrofit programmes.

Question 35: How could the fee structures for certification, audit and assurance activities be designed to ensure that the oversight system is sustainable, affordable for businesses, and that those responsible for non-compliance bear the cost?

AgilityEco believes the fee structure should reflect the principles of proportionality, transparency and risk.

Organisations demonstrating consistently high levels of compliance and positive consumer outcomes should not bear the same regulatory costs as those requiring repeated intervention. A risk-based approach to audit and assurance should therefore be reflected within the fee structure wherever practicable.

Similarly, organisations responsible for significant non-compliance should contribute proportionately towards the additional regulatory activity required to address those failings. This creates an appropriate incentive for continuous improvement whilst ensuring that the wider sector does not subsidise poor performance.

At the same time, Government should seek to avoid unnecessary duplication of assurance activity, as duplicate audits or overlapping oversight arrangements ultimately increase costs without improving consumer outcomes.

Finally, the long-term success of the reforms will depend not only on the design of the framework itself but on its stability over time. Organisations will only make the substantial investments required in governance, systems and workforce capability if they have confidence that the fundamental standards and regulatory expectations will remain consistent. Frequent changes to compliance requirements increase costs, discourage investment and undermine market confidence.

Government should therefore commit to maintaining a stable, predictable assurance framework that provides organisations with the confidence to invest for the long term. Regulatory certainty will be just as important as the reforms themselves in creating a sustainable retrofit market capable of delivering the ambitions of the Warm Homes Plan.