Reforming consumer protection for home upgrade schemes

CIEH response to a Department for Energy Security and Net Zero consultation

September 2026

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,000 members working in the public, private, and non-profit sectors. Building on its rich heritage, CIEH ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to our environment and our health.

For more information visit www.cieh.org.

Any enquiries about this response should be directed to:

Mark Hope
Senior Policy and Public Affairs Executive
Chartered Institute of Environmental Health
Email: m.hope@cieh.org

Responses to consultation questions

Chapter 1

Q1) Does the case for change accurately describe the root causes of issues with the current consumer protection system?

- Yes

The consultation correctly identifies the principal root causes of failure in the current consumer protection system: fragmented oversight, incomplete data, inconsistent assurance, weak enforcement, and unclear redress, all of which have contributed to poor outcomes for some households and damaged consumer confidence. There are, however, additional delivery-critical gaps that should be reflected explicitly in the case for change.

First, the current short, wave-based funding model prevents long-term contracting, pipeline aggregation, and investment in local supply chains. To deliver at the scale required, multi-year, pipeline-based capital is essential. Second, while Publicly Available Specification 2035 (PAS 2035) and strengthened assurance are vital for quality, targeted investment in workforce training and development, including PAS roles and accredited installers, is urgently needed. A proportionate fast-track assurance route for repeatable building archetypes would help ensure quality requirements do not become the primary constraint on throughput.

In addition, the future system needs clearer recognition of how consumer protection will operate where retrofit works are landlord-led, grant-funded, and delivered through business-to-business contracts rather than direct consumer contracts. This includes clarity on how the proposed reforms will interact with existing landlord duties, tenant complaint routes, and the wider social housing regulatory framework. Accountability can become uncertain in these delivery models, and the new system must provide unambiguous responsibilities and escalation routes.

Finally, we urge the government to commit to clearer transitional arrangements that align Energy Performance Certificate (EPC) / Minimum Energy Efficiency Standards (MEES) obligations with funded support, and to standardised financial protections and remediation guarantees for consumers.

Q2) To what extent do you think the proposed reforms would improve consumer protection outcomes in home upgrade schemes?

- Somewhat improve

We consider the proposed reforms would somewhat improve consumer protection outcomes. They correctly target fragmentation, weak data, and inconsistent redress, and would materially reduce consumer harm if implemented well. However, their effectiveness will depend on pairing regulatory reform with the delivery enablers required for large-scale, high-quality retrofit.

To realise their full benefit, the reforms must be accompanied by multi-year, pipeline-based funding, funded local delivery hubs, targeted workforce and small and medium-sized enterprise (SME) support, and a proportionate fast-track assurance route for repeatable archetypes. Without these measures, there is a risk that stronger regulatory requirements will improve protection in principle but slow the pace of delivery.

Further clarity is also required on how the proposed consumer protection framework will interact with existing regulatory requirements for social landlords, including landlord complaint procedures, Housing Ombudsman arrangements, Consumer Standards, and wider landlord responsibilities under the Social Housing (Regulation) Act 2023. The framework should complement existing duties and avoid creating multiple overlapping routes for tenant complaints and redress, particularly where retrofit works are landlord-led, grant-funded, and delivered through business-to-business contracts rather than direct consumer contracts.

Overall, the reforms would somewhat improve outcomes, but only if supported by the delivery conditions and regulatory alignment necessary for effective implementation across both private and social housing sectors.

Chapter 2

Q3) 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?

The main challenges in aligning the future consumer protection system with the reformed building oversight regime include fragmented responsibilities between national and local bodies, misaligned regulatory and funding cycles, resource-intensive assurance processes that risk becoming delivery bottlenecks, limited PAS 2035-accredited workforce capacity, and inconsistent data standards that hinder joined-up case management and early identification of systemic issues. Additional risks arise from the speed and structure of regulatory scale-up; recent building safety reforms demonstrate how insufficient regulatory capacity can create significant approval delays.

Clarity is also required on the scope of the proposed national data system. A single, government-managed dataset with a common schema is essential to avoid market fragmentation and ensure interoperability, particularly given current inconsistencies across PAS 2035 certification platforms. For social housing, alignment must take account of existing landlord duties under the Building Safety Act, damp and mould obligations, tenancy management responsibilities, Housing Ombudsman arrangements, and Consumer Standards, ensuring the new framework complements rather than duplicates existing routes for complaints and redress.

To address these challenges, the following measures should be incorporated into system design:

- Hybrid governance — a national body for policy, standards, and enforcement, with funded local delivery hubs responsible for operational case management, audits, and procurement.

- Aligned multi-year funding — pipeline-based capital envelopes tied to delivery plans to enable long-term contracting, workforce investment, and supply-chain development.

- Proportionate assurance — retain PAS 2035 protections while introducing auditable fast-track pathways for repeatable, low-risk archetypes.

- Workforce and SME support — dedicated funding for PAS roles, training hubs, accreditation, and SME development.

- Single data standard — a government-owned dataset enabling end-to-end case tracking, systemic risk detection, and transparent reporting.

- Standardised financial protections — minimum warranty and insurance requirements, supported by a centrally backed remediation fund.

These measures will reduce handoffs and delays, ensure regulatory alignment, strengthen consumer protection, and support the required scale of high-quality retrofit.

Chapter 3

Q4) 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

We support a single integrated end-to-end consumer protection service for all DESNZ-supported home upgrade schemes, provided it is implemented as a hybrid model that combines national standards and enforcement with funded local delivery hubs responsible for operational delivery. A single service offers clear benefits: streamlined accountability, consistent assurance, an approved installer register, and a government-owned data system capable of identifying systemic risks earlier.

To function effectively and avoid operational bottlenecks or unfunded liabilities, the model must be accompanied by multi-year, pipeline-based funding, ringfenced workforce and SME support for PAS 2035 roles, proportionate fast-track assurance pathways for repeatable, low-risk archetypes, and standardised financial protections including a robust remediation mechanism. Without these delivery enablers, local authorities and social landlords may be forced to create parallel processes to manage capacity constraints, reintroducing fragmentation at the operational level.

The framework must also be capable of reflecting different delivery models. In social housing, tenants do not typically select installers or enter into direct contracts. The system should therefore distinguish clearly between owner-occupier, private rented, and social housing delivery routes, while maintaining consistent protections for residents and ensuring alignment with existing landlord regulatory duties.

With these conditions in place, a DESNZ-oversighted single service would substantially simplify the system, reduce fragmentation, and materially strengthen consumer protection while supporting the high-volume, high-quality retrofit delivery required to meet regional targets.

Q5) Should DESNZ and the Warm Homes Agency be directly responsible for delivering any specific functions to safeguard consumer protections?

- Yes

DESNZ and a government-owned Warm Homes Agency should be directly responsible for system oversight and enforcement, the government-owned data system, the approved installer and professional register, the national assurance framework, and administration of minimum financial protections and a remediation guarantee. These functions require statutory authority, national consistency, and the ability to act across schemes to detect systemic risks, enforce standards, and provide a single, reliable route to redress.

Operational delivery, including pipeline management, procurement, local audits, and remediation works should be delegated to funded local delivery hubs operating under national standards and feeding data into the central system. This model preserves national accountability while retaining local delivery agility and capacity.

It is also essential that the national system maintains clear operational access for local authorities and social landlords. They will need visibility of case data, audit outcomes, and remediation records for homes they own or manage. The framework should not remove local accountability or impede landlords' ability to manage their stock effectively. Instead, it should support a coherent, end-to-end process that aligns national oversight with local responsibilities.

With these conditions in place, a DESNZ-oversighted Warm Homes Agency would provide strong national consistency while enabling effective local delivery and maintaining the operational access required for landlords and local authorities.

Q6) What would be the main advantages or disadvantages of delivering through a single service provider versus multiple service providers?

A single service provider offers clear advantages: national accountability, consistent assurance and data standards, and a simpler consumer journey with one point of contact for redress. Centralised oversight, an approved installer register, and a government-owned data system would strengthen enforcement and enable earlier detection of systemic risks.

However, a single provider also carries risks, including a single point of failure, potential capacity bottlenecks, and reduced adaptability to local housing archetypes and supply-chain conditions.

Multiple providers, by contrast, offer local adaptability, competition, and operational resilience, but introduce fragmented accountability, inconsistent consumer protection, and complex data aggregation.

To balance these considerations, we recommend a hybrid model: national system-level functions (standards, installer register, data platform, enforcement, and remediation fund) should sit with DESNZ or the Warm Homes Agency, while operational delivery should be undertaken by funded local delivery hubs and accredited providers. This preserves national consistency and early risk detection while retaining local flexibility, competition, and resilience.

The model must also reflect different delivery routes, particularly in social housing where tenants do not select installers or enter into direct contracts. Local authorities and social landlords should retain a practical role in resident engagement, access, safeguarding, and local delivery management, supported by clear operational access to case data, audit outcomes, and remediation records.

With these conditions in place, a hybrid DESNZ-oversighted service would simplify the system, reduce fragmentation, and materially strengthen consumer protection while supporting high-quality retrofit delivery at scale.

Chapter 4

Q13) 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.

We believe several changes would significantly improve how the system works for vulnerable consumers. Vulnerable households often face overlapping barriers, digital exclusion, low confidence, limited technical understanding, health conditions, language barriers, and financial stress, and the system must be strengthened to ensure it is genuinely accessible and supportive.

The following changes would improve outcomes.

- *Stronger integration with local advice*
  National services should work closely with trusted local authorities, housing providers, advice agencies, and community organisations. Locally rooted support is essential for residents who are vulnerable, digitally excluded, or have language barriers.

- *Proactive, personalised case management*
  Experience from the Local Energy Advice Demonstrator (LEAD) project shows that vulnerable households need active follow-up, clear communication, and continuity of support. A dedicated case manager within the consumer protection service would help ensure issues are resolved quickly and prevent households from navigating complex processes alone.

- *Accessible communication formats*
  Information should be available in plain English, multiple languages, Easy Read formats, non-digital channels, and text-to-speech options. Translations should be sense-checked to avoid literal wording that loses meaning.

- *Stronger safeguarding protocols*
  Installers and assessors should receive training to identify safeguarding concerns and refer appropriately, reflecting best practice in social housing, health services, and local authority programmes.

- *Enhanced post-installation support*
  Vulnerable households often need help operating new systems or recognising early signs of faults. Home visits, telephone check-ins, and simple user guides are essential for ensuring long-term benefits.

The system should support authorised representatives, advocates, carers, and support workers to act on behalf of vulnerable residents, with appropriate consent and data protection arrangements. It should also provide non-digital access routes, translated materials, Easy Read options, and text-to-speech capability to ensure residents can engage meaningfully with retrofit information.

Improving outcomes for vulnerable consumers requires more than a standardised journey. It requires proactive, personalised, locally rooted support; accessible communication; strong safeguarding; and ongoing guidance. The most effective models combine national standards with local delivery, trusted intermediaries, and dedicated case management, ensuring vulnerable households receive consistent, high-quality support throughout the retrofit process.

Q14) What, if any, changes would improve how the system works for installers and grant recipients, including local authorities and social housing organisations?

Several practical changes would improve how the system works for installers and grant recipients. A single, consistent assurance framework across all schemes would reduce duplication and conflicting requirements. A streamlined digital platform that avoids repeated data entry and integrates with existing PAS 2035 and housing management systems would significantly reduce administrative burden. Clearer, stable guidance with fewer mid-scheme changes would help installers, local authorities, and social landlords plan delivery more effectively. Predictable, risk-based auditing would ensure compliance checks are proportionate and do not disrupt delivery unnecessarily. Finally, dedicated support channels for local authorities and social housing providers would enable faster issue resolution.

Social Housing Decarbonisation Fund consortia show that shared resources, joint procurement, and consistent standards can improve efficiency and strengthen installer confidence across multiple landlords.

The LEAD service should act as a support mechanism for local authorities and social landlords, helping them manage contracts and resolve delivery challenges. It should not be used primarily as an enforcement tool.

The system must acknowledge that delivery challenges often arise from factors beyond the direct control of installers or landlords. These include resident vulnerability, refusal of access, safeguarding concerns, hoarding, language barriers, and tenancy-related issues. Programme performance measures should reflect these realities to avoid penalising providers for circumstances they cannot reasonably control.

The consumer protection service should therefore support grant recipients with practical delivery and contract management, not operate solely as an enforcement mechanism. A supportive model will help maintain installer capacity, improve delivery outcomes, and reduce fragmentation.

Chapter 6

Q23) What additional measures (if any) would improve enforcement and compliance?

A combination of regulatory, contractual, and data-sharing arrangements is needed to ensure installers cannot avoid remediation responsibilities, including by leaving oversight bodies or dissolving companies. Additional enforcement measures should apply to both companies and relevant individuals so that responsibility cannot be avoided through dissolution, rebranding, or movement between certification bodies.

The following key measures would strengthen enforcement and compliance.

- A persistent installer identity system — a single, cross-scheme identifier for companies and key individuals (directors, technical managers, qualified operatives). This prevents avoidance of sanctions through rebranding, moving between schemes, or dissolving and re-forming companies.

- Mandatory cross-scheme intelligence sharing — real-time sharing of audit results, sanctions, complaints, and remediation status across TrustMark, the

Microgeneration Certification Scheme, competent person schemes, Building Control, and local authorities. This closes gaps where poor performers currently move between oversight bodies undetected.

- Director-level accountability — linking compliance obligations to responsible individuals, not just corporate entities. This aligns with building-safety regulatory principles and prevents evasion through company dissolution or organisational restructuring.

- Financial safeguards for remediation — insurance-backed guarantees, bonds, or escrow mechanisms that ensure remediation funds remain available even if a company exits a scheme or ceases trading.

- Programme-level contractual enforcement — commissioners should be able to enforce remediation obligations regardless of changes in certification status, including withholding payments or calling on guarantees.

- Restrictions on re-entry — preventing installers or directors with outstanding remediation obligations or serious sanctions from re-entering the market under new entities until issues are fully resolved.

- Enhanced oversight for high-risk measures — proportionate enforcement for measures with known systemic issues (external wall insulation, internal wall insulation, ventilation, structural works).

- Clear escalation routes to Building Control — automatic referral when installers attempt to leave a scheme with unresolved non-compliance or safety concerns.

To strengthen individual accountability further, persistent identifiers should be linked to Companies House data, including directors, connected entities, dissolved companies, and previous sanctions. Fit-and-proper person checks should apply to directors, technical managers, and other responsible individuals seeking access to government-supported schemes, ensuring obligations cannot be avoided by hiding behind corporate structures.

Together, these measures close loopholes, strengthen accountability, and ensure that remediation responsibilities are durable, enforceable, and cannot be avoided through administrative or organisational changes.

Chapter 7

Q26) To what extent do you agree with the proposal to centralise responsibility for redress under the consumer protection service?

- Strongly agree

Centralising responsibility for redress under the consumer protection service would significantly strengthen consistency, transparency, and accountability across the retrofit system. At present, redress pathways vary between certification bodies, scheme operators, and individual installers, which creates confusion for consumers and commissioners and allows gaps where issues can be delayed or unresolved.

A single, centralised redress function would:

- Provide a clear, accessible route for consumers, reducing the complexity of navigating multiple bodies.

- Ensure consistent decision-making and enforcement, rather than variable approaches across schemes or certification bodies.

- Improve system-wide intelligence, enabling patterns of failure, high-risk installers, and recurring issues to be identified more quickly.

- Strengthen remediation oversight, ensuring installers and subcontractors cannot avoid responsibilities by moving between schemes or dissolving companies.

- Support programme delivery, giving commissioners confidence that issues will be handled promptly and consistently.

A centralised redress mechanism would also help ensure that funded programmes operate within a coherent national framework, reduce administrative burden, and improve consumer trust in retrofit delivery.

To be effective, the centralised redress system must be clear about how it interacts with landlord complaint procedures and Housing Ombudsman routes. Tenants should not be passed between multiple systems or left uncertain whether to complain to their landlord, the contractor, the consumer protection service, or another body. Clear signposting, defined responsibilities, and aligned escalation pathways are essential to avoid duplication, confusion, or gaps in protection.

A centralised redress function strengthens accountability, improves consistency, and provides a clearer experience for consumers. With explicit alignment to landlord and Housing Ombudsman processes, it can operate as a coherent, accessible, and reliable mechanism across the whole retrofit system.

Q30) Should government explore the creation of a solidarity fund to support consumers when other remediation routes are exhausted?

- Yes

Government should explore the creation of a solidarity fund as a last-resort protection for consumers when all other remediation routes are exhausted. Even with improved oversight, guarantees, insurance-backed protections, and stronger enforcement, there will remain a small number of cases where remediation cannot be secured because installers have dissolved, subcontractors have disappeared, or liability cannot be enforced. A solidarity fund would provide a safety net for these exceptional situations, preventing consumers from being left with unresolved defects or unsafe homes. This is particularly important in complex retrofit projects and in cases involving vulnerable residents, where the consequences of unresolved issues can be severe. A carefully designed fund, used only after all other mechanisms have been pursued, would strengthen trust in the system and ensure that no consumer is left without a route to redress.

Chapter 8

Q33) What practical steps could reduce administrative burden in the reformed system?

Administrative burden could be reduced through clearer data standards, streamlined audit processes, and better integration between oversight bodies and scheme operators. Practical steps include unified digital lodgement across all schemes so data is entered once; standardised evidence requirements to remove variation between certification bodies; proportionate, risk-based auditing that reduces routine paperwork for consistently high-performing installers; shared data platforms between TrustMark, scheme operators, and local authorities to avoid repeated information requests; clear, consistent templates for contracts, consumer documentation, and technical evidence; integrated remediation tracking so installers do not have to respond separately to multiple bodies; simplified subcontractor declarations with a single point of registration and competence verification; and better alignment of scheme rules so installers working across multiple programmes face one coherent set of expectations rather than multiple overlapping requirements.

For social landlords, it will be important to understand how these reforms complement or interact with existing requirements so that any additional cost impacts are clear. The system should avoid creating duplicate reporting into grant monitoring systems, housing asset management systems, PAS lodgement platforms, and the new consumer protection service. Integration with existing landlord systems and workflows is essential to ensure that administrative burden does not increase and that data entry is genuinely streamlined rather than multiplied.

Overall, practical steps to reduce administrative burden should focus on single data entry, standardised evidence requirements, and integration with existing systems, ensuring that both installers and social landlords experience a coherent, efficient, and proportionate compliance environment.

Q34) What direct and indirect costs might arise from the proposed reforms for your organisation or others?

Direct and indirect costs will arise across programme management, compliance, workforce development, and market participation.

For local and regional authorities, direct costs include adapting internal systems to interface with strengthened oversight, investing in staff training, and managing more complex case handling and remediation processes. Indirect costs include increased programme administration, greater time spent supporting consumers through centralised redress pathways, and potential delays in delivery while installers adjust to new requirements.

For installers and retrofit professionals, direct costs include higher expenditure on training, competence verification, quality management systems, insurance-backed guarantees, and financial protections. Indirect costs include time spent navigating new compliance processes, responding to more detailed audits, and managing remediation obligations. SMEs may face disproportionate impacts because they have limited administrative capacity and less ability to absorb upfront compliance costs.

For retrofit professionals, strengthened accountability may also increase demand for qualified assessors, designers, and co-ordinators. This could create capacity pressures unless accompanied by investment in training and professional development.

For third-sector organisations, direct costs may arise from increased co-ordination with the redress system and supporting vulnerable households through more formalised processes. Indirect costs include additional reporting requirements and the need to adapt advice services to reflect new consumer protection arrangements.

For manufacturers and product suppliers, direct costs include clearer documentation, evidence provision, and potential liability pathways. Indirect costs include increased scrutiny of product performance and closer integration with installers and oversight bodies.

Across the market, indirect costs also include potential short-term reductions in installer participation, which may affect delivery capacity and increase commissioning effort. Over time, these costs may reduce as the system stabilises and higher-quality, better-supported firms remain active in government-supported schemes.

For social landlords, it will be important to understand how these reforms complement or interact with existing requirements to assess whether there will be cost impacts beyond training to use the new system. Practical steps to reduce administrative burden — particularly single data entry, standardised evidence requirements, and integration with existing systems — should ensure the reforms do not create duplicate reporting into grant monitoring systems, housing asset systems, PAS lodgement platforms, and the new consumer protection service.

Overall, while the reforms will raise quality, strengthen consumer protection, and improve trust in the retrofit sector, they must be implemented carefully to avoid disproportionate impacts on smaller firms and to ensure that delivery bodies, including social landlords, have the capacity and systems needed to meet strengthened expectations.