



## Committee on Fuel Poverty

# Committee on Fuel Poverty's response to the Reforming Consumer Protection for Home Upgrade Schemes consultation

### **Chapter 1**

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

Yes

#### **Please outline any additional issues with evidence where possible.**

The case for change outlined in the consultation broadly covers the issues in the current consumer protection system, as outlined by both the NAO, in their October 2025 report, and in the CFP's 2026 Annual Report<sup>1</sup>. The current landscape is chaotic, with multiple bodies claiming not to have responsibility over key parts of the process, leaving many people without the ability to have problems rectified, or even knowing who they should complain to about poor installations.

Existing retrofit delivery has failed too many fuel-poor households because of inconsistent quality, fragmented delivery, poor targeting and insufficient oversight, and solutions that simplify the landscape and include a clear process for redress are needed.

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

Somewhat improve

#### **Please explain your answer.**

The CFP strongly supports the policy objectives of work being right first time, a simplified system, and swift remediation / redress where needed. Fuel poor households require trusted advice, high-quality installations and effective protection if retrofit is to achieve fuel poverty objectives.

If delivered successfully these objectives will make a meaningful improvement to consumer protection. It is clear that the Warm Homes Agency will have a pivotal role in

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<sup>1</sup> [Energy efficiency installations under the Energy Company Obligation - NAO report](#)



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this space. However, there is not yet sufficient detail regarding the Warm Homes Agency and its remit to understand how this will work in practice. Government needs to be clear as to the balance of the Agency's role as a standards setter and a standards enforcer. It should also be clear about the Agency's role in customer complaints and redress – does it see the Agency acting as a single source of redress or is it intended to be a clearly defined point of escalation (almost an Ombudsman style role) when initial contact with funders (for example local authorities) and/or installers fails to resolve a case? A balance needs to be struck between the Agency having an active role in delivery or an oversight style role that is not interventionist in practice.

### **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?**

In a complex environment, with potentially overlapping requirements across the building oversight regime and consumer protection system, it will be vital to ensure clear lines of accountability.

### **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

**Please explain your answer.**

Government needs much stronger oversight of retrofit delivery to achieve statutory fuel poverty targets. A single integrated end-to-end customer protection service is a definite step forward compared to the fragmented landscape at the moment. One significant failing highlighted by the NAO report was the complexity of the systems and the unclear lines of responsibility, and having a single point of redress would go some way to addressing this point.

However, given the scale of the retrofit challenge ahead, there needs to be some balance between the centralisation of consumer protection functions and the ability for local authorities and their partners to get on with delivery and manage first-line redress at a local level.



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This means that regular, independent and effective inspection regimes should be in place at a local level that drive quality and improve standards, as well as providing a route for first-line redress. The centralised, integrated source of end-to-end consumer protection should then act as the clear and overarching function for consumer redress, with ultimate accountability for resolving escalated issues that cannot be managed locally.

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

Yes

#### **If yes, please explain which functions should be delivered by DESNZ/the Warm Homes Agency.**

DESNZ and the Warm Homes Agency should be responsible for oversight of the customer protections system. This should include setting clear, accessible and consistent standards for delivery, requirements for certification of installers and requirements for remediation/redress. It should also involve targeted review / audit where data indicates there may be an issue, with appropriate consequences/enforcement.

The Warm Homes Agency should not be directly involved in day-to-day delivery, but should be the final arbiter in the case of issues cannot be resolved locally (as an Ombudsman would be). The Warm Homes Agency should however provide easily accessible information to the public outlining what they can expect from retrofit schemes, and where to go for redress.

The Committee believes this strikes the right balance between the Warm Homes Agency having an active role in delivery or an oversight style role that is not interventionist in practice. If the Agency's role is too interventionist and it becomes too involved in the detail of technical, standards driven issues and individual customer casework, then it will slow down delivery on the ground. However, if it is too hands-off then local organisations may not be resourced to handle all points of redress or complaint in a satisfactory way.

Given that the Warm Homes Plan commits Government to removing one million homes from fuel poverty through retrofit upgrades in the next three and a half years, then anything that slows delivery is problematic<sup>2</sup>. This needs to be delivered alongside much

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<sup>2</sup> [Warm Homes Plan - GOV.UK](#)



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stronger customer protection and is why it is so important to get the balance of responsibility right, and clearly defined from the beginning.

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

As referenced above, a single service provider risks slowing down delivery on the ground. It is therefore important that the services delivered by the Warm Homes Agency are well defined, with strong oversight of delivery organisations.

### **Q7) To what extent do you think the proposed service, under DESNZ oversight, would reduce fragmentation in the current system?**

Not sure

#### **Please explain your answer.**

The proposed service certainly has the potential to reduce fragmentation in the current service, if delivered with clear remit and authority, as set out in our response to question 5. However, there is not currently sufficient detail around the scope and role of the service for this to be certain.

### **Q8) What data and performance information is most important for monitoring the effectiveness of the system? Please select all that apply.**

ALL OF THESE: consumer queries and complaints / building control notifications and additional lodgements / audit findings / scheme data / installer, retrofit professional and installation performance indicators / guarantee claims and outcomes / home condition data, energy use data before and after / other (please specify in your written response)

#### **Please explain your answer.**

All of the suggested data and performance indicators listed would provide useful intelligence for different purposes. For a customer protection service, we would suggest that the items that focus on customer outcomes are most important.

The Committee would also like data to be collected showing how many fuel poor households had retrofits delivered, and the impact of these installations when accounting for changes in household behaviour – i.e. did they reduce bills, improve comfort, take the household out of fuel poverty?



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The CFP would like to see open book records of quality of installations, and any performance statistics that are collected from fabric installs or services, such as U-value measurement or COP/Running costs of ASHP for example.

### **Q9) Do you agree with the proposed scope of schemes which would be covered on a mandatory basis by the consumer protection system?**

No

#### **If No, please explain your answer.**

All of the schemes listed should be covered on a mandatory basis by the consumer protection system. To be effective the scheme should cover retrofit of all buildings, not just government schemes. All retrofit delivery should come under the same customer protection service, as poor delivery of privately funded retrofit can have the same impact on households, and avenues for redress are just as fragmented.

Whilst we understand heat network projects cannot be meaningfully disaggregated to individual household level, we are concerned that customers may not receive the same level of protection if not included under the same consumer protection service.

### **Q10) Do you agree some elements of the reformed consumer protection system should also be available to the wider market on a voluntary basis?**

Not sure

#### **Please explain your answer.**

As referenced in our answer to question 9, it would be beneficial if the wider market were required to participate, rather than it being optional. If it remains voluntary, the Warm Homes Agency should publicise who is involved voluntarily, to provide transparency for households choosing an installer.

## **Chapter 4**

### **Q11) To what extent do you agree that the proposed consumer journey would be clear and easy for consumers and installers to navigate?**

Not sure

There is not enough detail about governance and accountability for the proposed customer journey so we cannot be sure that it will be clear and easy for customers and



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installers. We would encourage Government to include greater detail on this when responding to consultation feedback.

**Q12) Which aspects of the proposed consumer journey are most likely to improve consumer outcomes? Select all that apply:**

SELECTED: Access to impartial advice / Consumer protection service as the primary point of contact / Clearer information on installers, retrofit professionals and processes / Ongoing guidance after installation Other (please specify in your written response) /

NOT SELECTED: Centralised case management by the consumer protection service / None of the above

**Please explain your answer.**

We would add independent inspections and quality checks to the list above.

A simple, accessible and replicable customer journey is absolutely critical to generating the scale that we need to see in the retrofit challenge. This can be achieved without sacrificing high levels of installation quality and compliance. It can also be done whilst still embedding the right points of escalation and the right points of redress at the right stage in the journey. Work needs to be done – and examples of existing best practice need to be studied – to find out how this can be achieved. In short though, having a single point of access for enquiries and advice in the first instance (such as Energy Saving Trust's network in Scotland and Wales) and ensuring independent inspections and quality checks at key stages of the process are key to maintaining installer compliance and building customer trust, which is particularly crucial for vulnerable, fuel poor households.

We would expect to see regular monitoring reports, not only of consumer satisfaction and the outcomes of independent quality inspections in relation to installation quality, but independent audits of hardware.

**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.**

For vulnerable households a simple and accessible customer journey, including independent post-installation inspections, advice and guidance is vital. It is also



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important that the right points of escalation and redress are accessible and responsive at every stage of the journey.

The Committee's recent research project on heat pumps demonstrates the importance of ensuring households understand how to use the technology installed, and bespoke, comprehensive handovers and post-installation visits were called out as effective ways to do this.

The full research paper, How to ensure a successful transition to heat pumps for households at risk of fuel poverty, [can be found here](#).

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

For each of these groups, the critical characteristics of the system are accessibility, clarity and consistency. Taking each of these groups in turn:

Installers: these organisations are going to be asked to ramp up their workforce and invest in significant scale of delivery if we are to hit retrofit targets. We cannot ask them to make this investment if the system – or its component features – is constantly changing or is impossible to translate into scalable delivery on the ground. The system needs to set clear parameters that remain consistent over the long-term.

Grant recipients: fuel poor customers do not want to navigate multiple layers or organisations and bureaucracy if they have an issue with their retrofit process. They typically have many things going on in their lives and would rather have clarity, simplicity and accessibility if they need to use the system for help.

Local authorities / RSLs: often already very thinly stretched and tight on resource, these organisations usually want to be able to deliver for local residents in a way that doesn't make life more complicated. Again, this means that when they need to use the system, they will want simplicity and clarity in resolving any support needs.

### **Chapter 5**

### **Q15) 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 some extent

**Please explain your answer.**



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The CFP supports the development of rigorous standards and competencies across the retrofit sector, these should be supported by excellent training, assessment, CPD activities and rigorous auditing. It is equally important to ensure that standards are clear, consistent and transparent and do not inhibit the industry's ability to deliver at scale. Changes to the oversight regime must be made with this principle in mind, i.e. once they are set, they remain consistent in a way that supports long-term investment from supply chain businesses.

**Q16) 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 CFP note that PAS2035 is currently being updated, but with regards to consumer protection, we noted that the NAO report highlighted the lack of robust assessment. This can allow for inappropriate equipment to be installed in consumers' homes, so here we advocate the assessment process should be strengthened, namely by the mandating of BS40104 for retrofit assessment and QA procedures to support this.

### **Important Note**

**All Data in this section has been provided by Prof Richard Fitton PhD MRICS University of Salford, and a Committee on Fuel Poverty member.**

The CFP strongly advocates that all technical standards and related to retrofit be made free. This cost will not be overly significant and should be sponsored by the Government.

Below typical costs will be presented (Table 1/ Figure 2), these are large sums of money that contractors/professional will often not wish to pay for, in particular the smaller organisations or "one-man bands". This is a significant barrier to entry for retrofit services and is unacceptable. We urge for the following structural changes to be made:

1. All standards throughout retrofit (including non-domestic) to be made free and open access. This should be public facing (the public have a right to see what good looks like, and should be able to see what the standards for retrofit are that is happening in their own home). **Key point: Retrofit is one of the only public facing industries where the standards are hidden behind a paywall**
2. All standards to be fully digitised and placed on a web portal organised by retrofit category/measure/topic. This should be hosted by the WHA
3. Standards should be fully searchable and the latest versions only made available on this portal



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4. There are many standards that are referred to in PAS2035 and other documents that are simply out of date/revoked/ or no longer relevant. These should be updated with urgency and removed where not required.
5. The number of references in each standard should be reduced where possible
6. Longer term the government should consider revising the approach to standards and guidance in retrofit and move to a wiki-based design where all guidance is standardised and freely available to all in an easy-to-read system.

The PAS 2035 standard makes reference to around 114 “referred documents”, in this text we will use this standard as an example, but Prof Fitton has carried this exercise out for all data should the reviewing panel need to see it.

Firstly, we should consider the market spread shown in Figure 1 below that illustrates that most standards are published by BSI

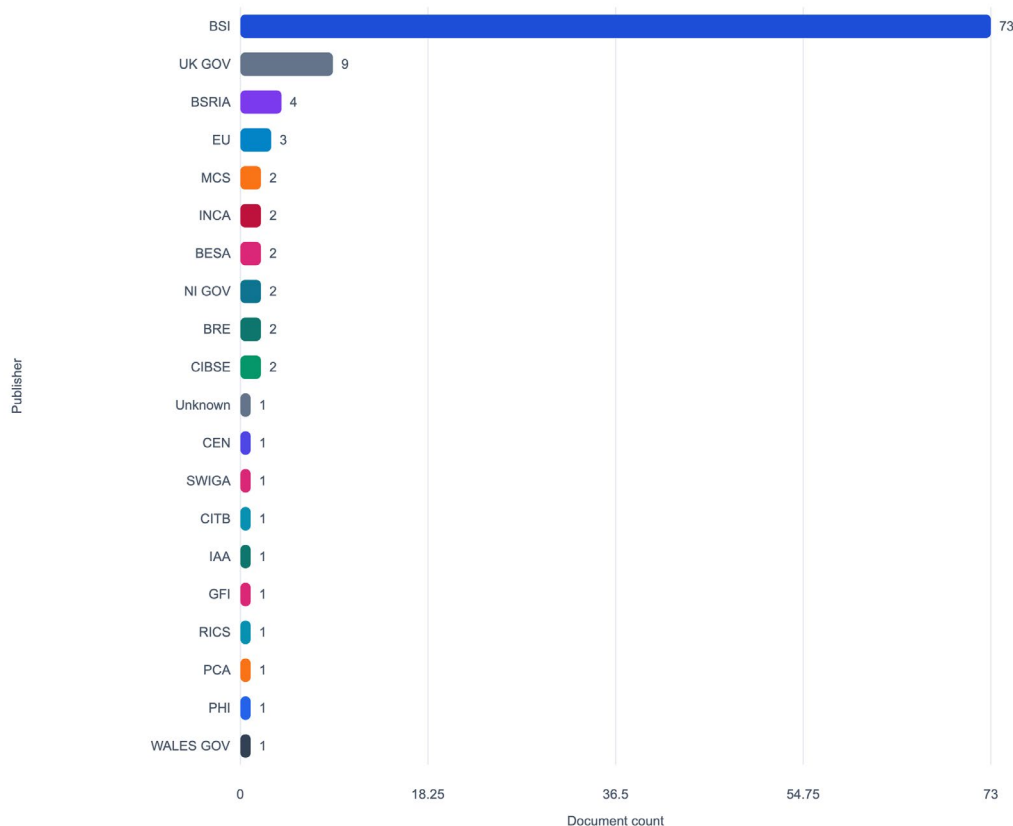


Figure 1 Market share of publishers of referred documents in PAS 2035



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Then we should consider who is being paid what sums of money for these referred documents, Figure 2 highlights that this again is mostly dominated by BSI (non-member costs shown).

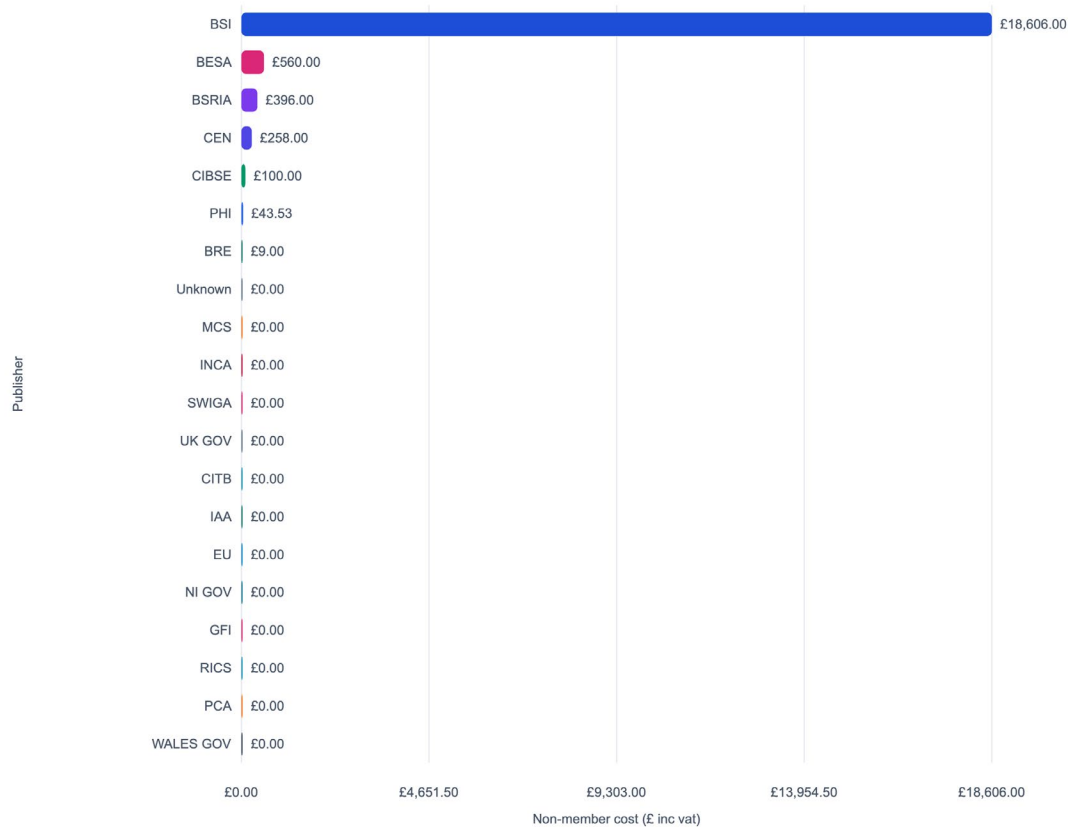


Figure 2 Costs by publisher



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In terms of the status of these documents many are under review, withdrawn, or have an unknown status, leaving only 75% that are actually technically current, as shown below in Figure 3.

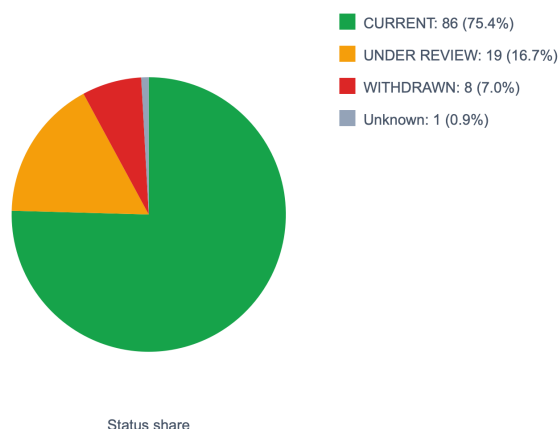


**Figure 3 Document status for PAS 2035**

Further to some of the documents being non-current, a lot of the standards are considerably older than we would like, and should be updated, or at least checked for validity, this is shown in Figure 4.

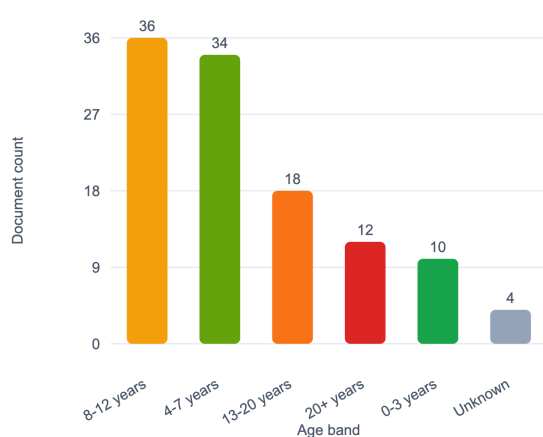


**Figure 4 Age of referred documents within PAS2035**



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An overview of costs and document details under current version of PAS2035, are highlighted below in Table 1. Note that the membership of the BSI membership scheme reduces the costs, but this is a paid for service, and starts at around £228, with this cost varying significantly depending on membership type and access. Note the high average costs, and the large number of pages included if all referred documents are included.

### Key metrics

|                                                                          |                                                                           |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <b>Rows</b><br><b>114</b><br><small>filtered records</small>             | <b>Total cost</b><br><b>£19,972.53</b><br><small>inc vat</small>          |
| <b>Member cost</b><br><b>£9,773.73</b><br><small>where available</small> | <b>Member saving</b><br><b>£10,198.80</b><br><small>vs list price</small> |
| <b>Average cost</b><br><b>£175.20</b><br><small>per record</small>       | <b>Pages</b><br><b>6,781</b><br><small>total</small>                      |
| <b>Average age</b><br><b>9.89 yrs</b><br><small>from update year</small> | <b>Publishers</b><br><b>23</b><br><small>6 categories</small>             |

Table 1 Overview of referred document in PAS 20235

We believe that the data presented here strengthens the case for making documents free. Prof Fitton has been involved in writing several EU and UK standards under BSI, neither himself or the committee is paid for this work, so the requirement for these standards to be paid for, at such high rates, appears to be an anomaly.

**Q17) Which approaches would be most effective for strengthening oversight of installers and retrofit professionals? Select all that apply:**

ALL OF THESE: Stronger audit requirements / Clearer competence frameworks / Public register of professionals / Stronger role for certification bodies / Greater government oversight / Other (please specify in your written response)]

**Please explain your answer.**

We believe that all of the above have a part to play, but stronger auditing and competency frameworks are essential. Greater Government oversight, to the extent that it is implemented, must be considered in a way that does not inhibit the scalable delivery that will be required to achieve fuel poverty targets on the ground.



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**Q18) What impact do you expect the proposals to strengthen assurance would have on costs across the supply chain? Please focus your response on costs associated with proposals for DESNZ-supported retrofit, and what government or industry actions could mitigate or manage these risks.**

We believe that this will have some impact that will tend towards higher administrative costs, but this will ultimately save money in the long term as remediation and prolonged chasing of redress measures is also prohibitively expensive and erodes consumer confidence. A robust, independent and transparent inspection regime – which is already in place for fuel poverty schemes in Wales (Warm Homes Nest) and Scotland (Warmer Homes Scotland) – costs more to administer but ultimately more than pays for itself in driving up quality standards and increasing consumer confidence.

For fuel poor homes, increased investment in quality assurance will help to actually reduce the number of homes in fuel poverty by ensuring the desired/designed requirements of retrofit are actually met and that the measures are performing, cost effective, and provide healthy homes.

**Q19) 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.**

It is important that Government sees the process of audit and inspection as a means of developing and working with supply chain companies to raise standards, rather than an aggressive, enforcement-based approach in the first instance. A collaborative, developmental approach to audit feedback will help good installers to become excellent ones, whereas a more ‘stick-based’ approach will simply serve to disengage them entirely. That being said, for the small number of companies that are not willing to do the right thing by customers, enforcement should be swift.

In addition, audit regimes should be more transparent, with information publicly available about audit regimes, and audit results (at a generalised level), so that stakeholders can be better informed when it comes to improving, developing and managing compliance and quality standards. It is in everyone’s interest that the Government provides this data, so that relevant stakeholders including the public can see how well (or not) we are attaining our retrofit and fuel poverty targets. This should ideally be carried out in quarterly reports with open-source tables made available.



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## Chapter 6

**Q20) To what extent do you agree that an intelligence-led risk-based approach to audit and assurance would improve system performance?**

Agree

**Please explain your answer, including which data or risk indicators would be most useful.**

The Committee is supportive of risk-based approach to inspection and oversight, but this works best when there is a detailed knowledge of local supply chains and local installers. The more intelligence gathered and the stronger visibility of local companies there is, the more straightforward it is to adopt a lighter touch approach with proven, high-quality partners whilst adopting a more focused approach with those that need more support to reach the required level.

The Warm Homes Agency cannot do the localised element of this alone – the local effort takes significant investment of time and resource but pays back in outcomes (it has already worked well across Scotland and Wales for more than a decade). Government has to be prepared to invest in ‘resource spend’ that drives up quality without seeing this as less important than ‘capital spend’.

**Q21) To what extent do you think the proposed graduated compliance model would provide an appropriate level of deterrence?**

Not sure

**Please explain your answer.**

The proposed graduated compliance model could provide an appropriate level of deterrence, but this will depend on how it is implemented. As set out in response to question 20, local resource will need to be in place to support early identification of issues at the low-severity stage. It will also be dependent on how successful the Warm Homes Agency is at preventing companies phoenixing and re-entering the supply chain under a new name.

**Q22) What arrangements would best ensure that installers cannot avoid remediation responsibilities, including by leaving oversight bodies or dissolving companies?**

Phoenixing is an issue in a number of markets, and will require cross-department collaboration to address.



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

See previous answers.

**Q24) Which option for contractual agreements would be more effective in underpinning installer and retrofit professional accountability?**

Not sure

**Please explain your answer, particularly if the most effective option differs between installers and retrofit professionals.**

The Committee sees some merit in option 2 and recognises that this is the approach that Government is minded to adopt. However, our support of this option is qualified by the risk that this approach creates more bureaucracy and complexity in the supply chain that could inhibit delivery at scale.

It is clear that this option is being considered because Government – rightly – wishes to stop rogue actors in the supply chain from disengaging with the consumer protection regime and navigating their way out of adhering to key requirements. However, it should be noted that this cohort is a minority of companies in the supply chain. Most installers and retrofit professionals want to do a good job and grow their reputation and their business through high-quality work. Adding in further layers of mandatory contractual compliance and oversight will make life more complex for everyone and risks inhibiting the growth of smaller installers, who typically tend to disengage when more layers of compliance are forced upon them.

The Committee is therefore supportive of the principle of preventing rogue actors from causing damage to consumer confidence, but is nervous about tackling this by implementing a solution that is too heavy-handed and makes life more difficult for all installers, including the majority of good ones.

**Q25) What, if any, prevention and enforcement controls should subcontractors be subject to? Please explain your answer and outline whether controls on individuals or companies would be most effective.**

It would usually be expected that the contractor retains responsibility for any work their sub-contractors do. However, if certification is at individual rather than company level, then individuals working for sub-contracts should also be certified.



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## Chapter 7

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

Strongly agree

**Please explain your answer.**

The Committee supports the introduction of a single complaint and case management function, so that customers have clarity on where they can go for remediation and redress. However, it will be important to ensure the caseload can be managed effectively – to enable this, it is likely that households will need to attempt to get redress from the original provider first and escalate to the consumer protection service where the issue is not resolved satisfactorily within a specified amount of time. This is how the Consumer Council for Water (CCW) works – customers may escalate a complaint to CCW if they are not satisfied with the outcome of their complaint when closed by their water company, or if it is not resolved within a specified time.

**Q27) Which additional consumer protection issues should fall within the scope of redress system arrangements? Select all that apply:**

ALL OF THESE: 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 / Other (please specify in your written response)

**Please explain your answer.**

All of the consumer protection issues listed in Chapter 7 should fall within the scope of the redress system arrangements. Installer conduct includes aftercare and maintenance – it should also include effectiveness of installation (for example, a Heat Pump should be right sized and set-up to work effectively in the home it is installed in).

**Q28) Which features of the proposed redress system are most important for delivering effective outcomes? Select all that apply:**

SELECT: Central case management / Use of guarantees and financial protections / Access to independent ombudsman / Defined escalation routes

DO NOT SELECT: ~~Other (please specify in your written response)}~~

**Please explain your answer.**

All of the features listed are important to enabling swift remediation and redress.



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**Q29) Do you agree that the government should use the NHIC recommendations and principles as the basis for reforming financial protection arrangements?**

Yes

**Please explain your answer.**

The NHIC recommendations represent a sensible basis on which to reform financial protection arrangements for retrofit.

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

Yes

**Please explain your answer.**

The Government will wish to consider how the existing arrangements in place with TrustMark and insurance-backed guarantees plays into this question. The Committee would like to see the outcome of that process, given the significant amount of time, resource and installer costs that have been given to TrustMark over the last few years – a significant element of which were intended to support consumers where first and second-line routes of remediation did not work as intended.

The Committee strongly supports the principle of problems being put right by those who caused them. However, we know this will not always be possible. Households may not want the original installer back in their home after doing such a poor job, and they may not feel like the fix has been done properly. In these cases, problems should be fixed by another party but paid for by the party that caused them.

Given the continued existence of phoenixing, there also needs to be protection for households where those that caused the issues are no longer operating. A solidarity fund should be used to support these households. As referenced in question 22 phoenixing will need cross departmental collaboration to address – it is likely to remain an ongoing challenge, and households should not be left without remediation and redress in the meantime. Government should look to recoup taxpayers' money from rogue installers wherever possible.



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## Chapter 8

**Q31) What are the most significant impacts of the proposed reforms on installers, retrofit professionals and other market participants? Please include any impacts on SMEs, third sector organisations, workforce capacity and market entry where relevant.**

Stronger quality assurance may increase delivery costs, but poor-quality retrofit ultimately costs far more through failed installations, loss of confidence and repeated interventions. Successful retrofit is essential for reducing fuel poverty and meeting net zero objectives. In addition to this, the increased drive towards competence and updating of standards will lead to costs around training, upskilling and even equipment (for instance BS401404 explicitly demands that air flow measurements are taken on mechanical ventilation, this equipment costs around £400 and requires calibration every year, at £100).

Ultimately, the Government's fuel poverty targets require all of these organisations to scale up rapidly and extensively in a very short space of time. If we are to remove one million homes from fuel poverty through the Warm Homes Plan, then installers, retrofit professionals and all market participants and stakeholders need these reforms to be clear, transparent and consistent over a period of years, not months. They need Government to create the right conditions for high-quality, scalable delivery and then they need to be able to get on with it.

**Q32) To what extent do you think the proposed reforms would affect installer participation in government-supported schemes?**

Not sure

**Please explain your answer.**

There is a risk that these reforms cause some installers – particularly smaller SMEs – to stop participating in government scheme work if they are too complex, too bureaucratic or too inconsistent in their application. The market must be set up so that excellent performers can thrive and good performers can become excellent ones as they develop. Some installers may leave the retrofit market entirely due to increased oversight placed on them by these reforms. If this means the minority of consistent poor performers and/or rogue actors leaving the market then this could be beneficial, although Government would have to be cognisant of the related risk that those rogue actors were then left unregulated elsewhere in the market.



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

See answer to questions 31 and 32.

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

Not answered.

**Q35) 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?**

In principle, non-compliance should be paid for by the non-compliant. It will be difficult to quickly design, implement and manage a system where those responsible for non-compliance fully bear the cost of compliance.

Given the scale of what the Government is trying to achieve in the Warm Homes Plan and the criticality of high-quality retrofit solutions at every stage of the coming energy transition, Government will need to take a pragmatic approach to putting in place an oversight system at speed.

The risk that rogue actors do not provide any form of financial redress will remain. Implementing a system that eliminates rogue actors and incentivises the higher-performing companies to keep investing and keep scaling their activity should therefore be an additional focus.