CIBSE Response to ‘Reforming Consumer Protection for Home Upgrade Schemes’ Consultation – 10 September 2026

About CIBSE

The Chartered Institution of Building Services Engineers (CIBSE) is the leading global body for building services professionals, championing sustainability, innovation and building performance across the built environment. We empower and equip professionals with the expertise, guidance and standards needed to deliver safe, efficient, and future-ready buildings. Through our leadership in decarbonisation, building performance and continuous professional development, we support a community dedicated to creating better places for people and the planet.

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Summary Statement

CIBSE welcomes the Department for Energy Security and Net Zero (DESNZ) consultation on Reforming Consumer Protection for Home Upgrade Schemes. CIBSE is the primary professional body for engineering in the built environment, setting building performance standards, producing authoritative guidance, and leading research into post-occupancy/ building performance.

CIBSE strongly supports transitioning the domestic retrofit market from a fragmented, transactional "measure-by-measure" marketplace to a unified, outcome-focused scheme under the Warm Homes Plan. However, consumer protection cannot be separated from building physics and engineering integrity. Consumer satisfaction and long-term asset value depend directly on avoiding unintended consequences (e.g., condensation, poor indoor air, oversizing, and severe performance gaps between expectations and reality).

Below are CIBSE's recommended consultation responses across all 35 questions, structured with explicit engineering justifications, references to CIBSE works, and policy evidence.

Responses to Consultation Questions

Chapter 1: The Case for Reform

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

Response: Yes.

The consultation accurately identifies fragmentation, overlapping oversight, lack of accountability, and weak redress mechanisms. However, CIBSE defers to consumer advocacy groups to comment on current consumer protection system CIBSE's evidence base (*Retrofit Revisit*) demonstrates that retrofit can deliver significant and long-term benefits on energy bills and comfort, when done well and as a whole house approach rather than treating building interventions (energy efficiency and low-carbon measures) in isolation.

Historical failures (such as internal wall insulation causing mould and interstitial condensation where moisture transfer and vapour control are not properly designed for the existing wall build-up, or heat pumps installed on un-balanced hydronic loops) occur when compliance is treated as a tick box exercise.

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

Response: Somewhat improve.

While centralising oversight and creating a single consumer journey may reduce consumer confusion and eliminate accountability gaps between schemes (ECO4, BUS), structural reform alone will not guarantee quality unless backed by rigorous technical competence frameworks, post-occupancy performance evaluation, and mandatory compliance with, and independent verification of, existing technical standards, principally PAS 2035 and PAS 2038, on all publicly funded home upgrade schemes.

CIBSE recognises that strengthening competence requirements, particularly a shift toward individual (rather than firm-level) assessment, carries a cost implication for industry, and recommends this be introduced alongside a proportionate cost-benefit assessment and phased implementation (see also CIBSE's response to Q18 and Q35) to avoid disproportionate burden on smaller installers and SMEs.

CIBSE has consistently made this case; government has previously been reluctant to mandate PAS compliance on publicly funded schemes, but recent, well-documented failures in insulation quality under existing schemes make the case for mandatory application and independent checking considerably stronger, and CIBSE urges DESNZ to revisit this position as part of the current reform. If the new service only streamlines complaint handling without tackling flawed design and poor commissioning, performance gaps will persist.

Chapter 2: Alignment with the Building Oversight Regime

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?

Response & Recommendations:

1. **Regulatory Silos vs. Holistic Performance:** Building Control (Part L, F) inspects compliance at point-of-completion, whereas PAS 2035 / consumer protection looks at ongoing operational risk.

Solution: For all publicly funded home upgrade schemes, require notification lodgments to the National Buildings and Retrofit database to automatically link to (or require confirmation of) the corresponding Building Control signoff, ensuring compliance with Part F is verified alongside Part L before the job is recorded as complete. CIBSE recommends this application to the mandatory (publicly funded) scope in the first instance, with extension to the voluntary wider-market scheme (see Q10) considered once the data infrastructure is established.

2. **Competence Threshold Disconnect:** The Building Safety Act 2022 mandates individual competence across duty holders. Consumer protection schemes often rely on company-level certifications.

Solution: Align certification body audits with individual competence frameworks rather than relying solely on firm-level administrative accreditation. CIBSE notes that transitioning from firm-level to individual competence assessment has cost implications for industry, particularly smaller organisations, and recommends DESNZ commission a cost-benefit assessment of implementation options, including transitional or phased approaches, before mandating this change (see also Q18, Q35).

Chapter 3: Delivery Model & System Oversight

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?

Response: Strongly agree

CIBSE supports a single service *from a consumer clarity perspective but* defers to public sector management experts regarding the operational setup. A fragmented system with multiple registers (MCS, TrustMark) creates "jurisdictional ping-pong" where consumers are shuttled between installers, manufacturers, and scheme providers when system failures occur. An end-to-end service ensures single-point responsibility. CIBSE notes the precedent of the New Homes Ombudsman, established for new build homes on a similar single-point-of-accountability basis; retrofit works represent a comparably high-cost, high-risk consumer purchase and would benefit from an analogous model (see also CIBSE's response to Q26).

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

Response: Yes

CIBSE can state what *technical data* the Agency must hold (National Buildings Database, audit thresholds) but cannot comment on the structure of the delivery.

CIBSE supports that DESNZ should retain and govern:

- The National Buildings & Retrofit Database: Centralising performance, audit, and lodgement data to ensure public interest transparency.
- Competence Framework Governance: Directly approving the standard-setting bodies and audit thresholds to prevent commercial dilution of technical standards by competing certification bodies.

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

Response:

Advantages: Absolute clarity of customer journey; unified data collection; consistent application of penalties; eliminated gaps in redress.

Disadvantages: Risk of creating a single-point operational bottleneck or a rigid bureaucracy that lacks deep, technical specialisation across distinct technologies (e.g., building envelope physics vs. complex hydronic heating).

The single delivery entity must subcontract or embed specialised technical expertise (e.g., engineering bodies like CIBSE/IET) for technical audits and dispute adjudication.

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

Response: Not sure

While DESNZ oversight may reduce consumer confusion, back-end technical alignment between MCS, TrustMark, and PAS 2035 must be fully rationalised for true non-fragmentation.

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

Response: All (viz. consumer queries/complaints; building control notifications; audit findings; scheme data; installer/retrofit professional performance indicators; guarantee claims; home condition data & pre/post energy use data.

CIBSE strongly asserts that pre- and post-upgrade operational energy data and environmental parameters are the most critical data streams. Static EPC software calculations do not reflect actual energy consumption. Collecting operational smart meter data and environmental monitoring (per British Standards) is the key indicator of whether a home is healthy, efficient, and delivered "right first time."

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

Response: Yes

All taxpayer-subsidised programs (ECO, Warm Homes Fund, BUS, Social Housing Decarbonisation Fund) must be governed by identical, non-negotiable consumer protection standards to prevent two-tier quality.

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

Response: Yes

The self-funded owner-occupier market represents the largest share of domestic housing. Allowing private consumers to utilise approved registers, standardised contracts, and centralised redress may help in building broad market trust and drive out rogue traders.

Chapter 4: The Consumer Journey

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

Response: Agree

Simplified flow improves accessibility. However, clarity depends entirely on how effectively "impartial advice" communicates complex engineering trade-offs (e.g., why insulation 'must' be accompanied by mechanical ventilation upgrades). CIBSE's agreement is based solely on the technical clarity of handover procedures, deferring to consumer research bodies on user journey accessibility.

12. Which aspects of the proposed consumer journey are most likely to improve consumer outcomes?

Response: Access to impartial advice; Consumer protection service as primary contact; Clearer information on professionals; Ongoing guidance after installation.

"Ongoing guidance after installation" is paramount. Many user complaints regarding heat pumps or ventilation systems arise from poor handovers, lack of clear user controls, or misunderstanding complex processes (such as the weather compensation curves).

13. What, if any, changes would improve how the system works for vulnerable consumers?

Response: CIBSE recommends mandatory In-Person Handover where occupants must receive structured, in-person operational walkthroughs (not just digital PDFs) for complex or unfamiliar systems such as new controls, heat pumps, or MVHR units.

CIBSE cannot comment on social policy or welfare referral models and defers to organisations like the National Retrofit Hub, National Energy Action (NEA) and Citizens Advice.

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

Response: No response.

Chapter 5: Standards, Competence, and Assurance Frameworks

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?

Response: To a large extent

Transitioning to individual competence frameworks and unified oversight addresses the historic weakness of "firm-level accreditation," where uncertified, untrained subcontractors work under a certified firm's banner.

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

Response:

1. Mandate Competence: Require all Retrofit Assessors, Designers, and Coordinators to demonstrate verified training in building physics, building performance, and retrofit design.
2. Standardise Hydronic & Ventilation Design: Mandate strict adherence to CIBSE Heat Networks/Heat Pump standards/ guides and CIBSE Guide B2 for system sizing, flushing, and balancing.
3. Integration of PAS 2035 with Professional Competency Requirements: Mandate verified, professional competency, assessed against defined Minimum Technical Competency (MTC) or National Occupational Standards (NOS) as the basis for undertaking high-risk Retrofit Design roles, rather than relying on generic professional registration or firm-level accreditation alone.

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

Response: Selected: Stronger audit requirements; Clearer competence frameworks; Public register of professionals; Greater government oversight.

Desk-based administrative audits are insufficient. Oversight must be strengthened through physical, site-based BPE audits, conducted during installation and post-commissioning.

18. What impact do you expect the proposals to strengthen assurance would have on costs across the supply chain?

Response: CIBSE cannot provide precise financial costings for compliance and assurance but emphasises the engineering cost benefit of avoiding expensive post-installation rework.

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

Response:

- Mandatory Site Audits: Certification bodies must conduct random, unannounced in-person site inspections at a meaningful and statistically credible sample rate, not merely review paperwork.

Note: CIBSE recommends this be defined in consultation with certification bodies (e.g. CIBSE Certifications) to ensure the requirement is both rigorous and operationally deliverable.

- Data Sharing: Mandatory, real-time sharing of audit failures and suspended installers across all certification bodies to eliminate "forum shopping" (where a failed installer re-registers with another body).

Note: CIBSE recommends DESNZ engages directly with certification bodies on the practical implementation of audit rate and resourcing requirements.

Chapter 6: Risk-Based Audit, Compliance, and Enforcement

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

Response: Agree. Audits should be targeted where risk is likely to be highest. Key Risk Indicators are:

1. Measures in isolation: For example, envelope airtightness without adequate ventilation provision - Any work that reduces air leakage across the building envelope, including draught-proofing/sealing, and internal, cavity, or external wall insulation, creates a risk of poor indoor air quality if not accompanied by adequate ventilation, regardless of whether a heat pump or other heating measure is also being installed.

2. Some property archetypes e.g. solid wall construction.

3. Outlier operational data: e.g. Installers reporting unrealistically high volume per worker or abnormal heat pump flow temperature specifications.

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

Response: To some extent

A phased approach, ranging from mandatory retraining, pre-clearance of designs, financial withholdings, up to permanent scheme bans, provides a proportionate, enforceable escalation route.

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

Response: CIBSE defers corporate legal experts and Trading Standards on company law enforcement. From a technical perspective, CIBSE stresses that insurance guarantees must explicitly cover latent building fabric defects regardless of corporate status.

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

Response:

- Cross-Agency Blacklisting: Automatic reporting between DESNZ, Trading Standards, and the Building Safety Regulator.
- Financial Withholding at Lodgement: Hold back a percentage of grant subsidy until post-commissioning validation data (e.g., heat pump commissioning log sheet + ventilation flow rate test) is successfully uploaded and verified.

24. Which option for contractual agreements would be more effective in underpinning installer and retrofit professional accountability?

Response: While CIBSE supports Option 1 (Binding tripartite/direct contractual agreements with central enforcement) to ensure clear accountability between designers and installers, CIBSE defers to legal specialists on exact contractual wording.

25. What, if any, prevention, and enforcement controls should subcontractors be subject to?

Response: Lead contractors must maintain a verified registry of all sub-contracted personnel on site. Subcontractors must hold individual cards demonstrating competency.

Chapter 7: Redress, Financial Protection, and Remediation

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

Response: Agree

Consumers currently face a labyrinth of MCS dispute panels, TrustMark ombudsmen, and small claims courts. Centralizing redress under a single ombudsman creates a rapid, fair resolution pathway. CIBSE has previously argued, in response to other government consultations, that the New Homes Ombudsman, whose remit currently covers new build homes, could be extended to cover retrofit and home upgrade works, given that these represent a comparably high-cost, high-risk purchase for consumers. CIBSE express support from a point-of-use perspective, deferring to the Energy Ombudsman on dispute resolution logistics on how such an extension of remit, or an equivalent dedicated retrofit ombudsman function, would best be structured.

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

Response: All (viz. Poor sales/marketing; Cancellation rights; Deposits; Financial/contractual; Installer conduct; Manufacturer obligations; Impacts on wider building fabric).

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

Response: Central case management; Use of guarantees; Access to independent ombudsman; Defined escalation routes.

Additional CIBSE Recommendation: Include an Emergency Technical Intervention Window. For failed heating systems during winter (October–March), remediation cannot follow a 30-day corporate dispute timeline, it requires immediate temporary heating provision and emergency technical triage within 24–48 hours.

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

Response: Yes

In principle, CIBSE supports the NHIC principles to ensure consumer confidence but defers to financial regulators and insurance industry bodies on execution.

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

Response: Yes

CIBSE supports a safety net of last resort to protect net-zero and retrofit policy reputation and protect consumers but leaves the financial structure and levy design to government economists.

Chapter 8: Market & Industry Impacts

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

Response: CIBSE represents professional engineers rather than trade SME business owners. However, we believe the proposed reforms level the playing field by squeezing out low-quality, undercutting operators; boosts consumer demand by building market confidence.

32. To what extent do you think the proposed reforms would affect installer participation in government-supported schemes?

Response: Not sure.

It will depend on the scheme implementation that is simple and fair.

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

Response:

1. Single-Sign-On Digital Portal: Establish a unified portal where an installer submits data once, automatically satisfying PAS 2035 lodgement, MCS registration, Building Control notification, and warranty issuance.
2. Standardised Commissioning Templates: Introduce standardised, mobile-friendly digital sign-off sheets (e.g., CIBSE Domestic Heating Design Guide System Criteria) for heat loss calculations, hydronic balancing, and ventilation testing.

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

Response:

1. Direct Costs: Development and updates to training curricula, professional registration platforms, and certification mapping.
2. Indirect Costs: Additional time spent by professional engineers navigating double audits if scheme frameworks overlap.

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?

Response: Polluter/Non-Complier Pays Fee Model.

- Keep initial registration and job lodgement fees low and flat across all participants to encourage SME entry.
- Increase audit fees exclusively for installers/professionals with a history of non-compliance, failed inspections, or high complaint rates. Compliant contractors with a record of accomplishment of high quality (verified through low audit failure rates) should benefit from fast-track processing and discounted lodgement fees.