Chartered Trading Standards Institute Response to Reforming Consumer Protection for Home Upgrade Schemes: Consultation

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ABOUT CTSI

Founded in 1881 (as the 'Incorporated Society of Inspectors of Weights and Measures'), today's Chartered Trading Standards Institute (CTSI) is one of the world's longest-established organisations dedicated to the field of Trading Standards and Consumer Protection.

At CTSI, and through the Trading Standards profession, we aim to promote good trading practices and to protect consumers. We strive to foster a strong vibrant economy by safeguarding the health, safety and wellbeing of citizens through empowering consumers, encouraging honest business, and targeting rogue practices. We provide information, guidance and develop evidence-based policies and campaigns to support local and national stakeholders including central and devolved governments. CTSI also provides the secretariat to the All-Party Parliamentary Group on Consumer Protection and campaigns on range of topics including product safety issues. CTSI is responsible for business advice and education in the area of Trading Standards and consumer protection legislation, including running the Business Companion service to provide clear guidance to businesses on how to meet their legal and regulatory obligations. CTSI also run training and development events for both the Trading Standards profession and a growing number of external organisations. We also provide accredited courses on regulations and enforcement.

Since 2013, CTSI has been contracted to provide administrative support to the Government recognised, multi-sectoral Approved Code Scheme (ACS), taking it over from the Office of Fair Trading. The Scheme operates through an independent, not for profit, Community Interest Company Board – the ACS Board. The ACS is free from commercial interests, and puts consumers' interests first, ensuring consumers' interests are protected. The Scheme was established to give consumers greater confidence when they buy from members of the approved scheme and also raises the standards of trading of all businesses that operate under the relevant Approved Code for that sector.

Chapter 1: The case for change

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

- **Yes**
- **No**

Please outline any additional issues with evidence where possible.

We strongly support efforts by the Government to address system level accountability in the home upgrade sector. We are working closely with the Department for Business, Innovation, Science and Trade (DBIST) to improve consumer outcomes and support for businesses. Trading Standards saw a large volume of the Energy Company Obligation 4 (ECO4) complaints surrounding consumers homes being installed with products that were unsuitable, not fit for purpose, not installed correctly, told they would have significant energy savings but ended up paying double or more in energy bills. We are keen to ensure that there is no repeat of the mistakes highlighted by the National Audit Office under ECO4.

Weak controls and lack of oversight were blamed for 98% of homes that had external wall insulation installed under the scheme developed mould and damp and will need work to correct it. We firmly believe that no sector should police itself. In other words, who is checking the checker. The Approved Code Scheme Board provides clear, independent oversight of the Approved Code Scheme. However, there are no details regarding proposals for independent oversight. There needs to be independent assessment of any consumer code, coupled with an approved redress scheme to help consumers when things go wrong. Any future initiative or scheme also needs to have consumer advice built in. This would make it easier for consumers to identify trustworthy businesses and help to improve consumer confidence in the sector. It would provide Government and consumers with re-assurance that the highest consumer standards are being maintained. It would also avoid the risk of commercial interests overriding consumer interests, thereby preventing a race to the bottom on consumer protection.

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

- **Strongly improve**
- **Somewhat improve**
- **Neither improve nor worsen**
- **Somewhat worsen**
- **Significantly worsen**
- **Not sure**

Please explain your answer.

We strongly support efforts by the Government to address system level accountability in the home upgrade sector. We are working closely with the Department for Business, Innovation, Science and Trade(DBIST) to improve consumer outcomes and support for businesses. We need to ensure that there is no repeat of the mistakes highlighted by the National Audit Office under the Energy Company Obligation 4 (ECO4).

We believe that no sector should police itself. In other words we would ask who is checking the checker. The Approved Code Scheme Board provides clear, independent oversight of the Approved Code Scheme and Code Sponsors are audited independently by Chartered Trading Standards Practitioners, who are Lead Auditors, to check for compliance. However, there are no detailed proposals for independent oversight. There needs to be independent assessment of any consumer code, coupled with an approved redress scheme to help consumers when things go wrong. Unlike other organisations, the ACS Board and CTSI are not-for-profit organisations, with a key focus on protecting consumers in high consumer detriment sectors and supporting bone fide businesses to raise business standards which enables fair competition. In this way, this offers clear and transparent oversight. We are happy to work with organisations for the benefit of consumers and businesses keen to act fairly within the legal compliance framework.

Any future initiative or scheme also needs to have consumer advice built in. This would make it easier for consumers to identify trustworthy businesses and help to improve consumer confidence in the sector. It would provide Government and consumers with re-assurance that the highest consumer standards are being maintained. This would avoid the risk of commercial interests overriding consumer interests, thereby preventing a race to the bottom on consumer protection.

CTSI already has a proven track record in delivering simple, proactive, relevant, modern and informative advice and education that supports consumers and businesses alike. CTSI operates the Government supported UK International Consumer Centre (UKICC). This provides free, impartial advice to consumers when they encounter problems when buying goods and services from outside the UK.

The Government supported Business Companion website operated by CTSI provides businesses with free, impartial guidance to help them understand and comply with complex legislation. It brings together expert guidance, practical resources and up-to-date information in one easy-to-use place, written in plain English and designed to cut through jargon. By providing self-service support, tools, templates and specialist guidance, the website helps organisations find the information they need quickly, make better decisions, avoid mistakes and improve compliance with confidence.

The Business Companion training offered by CTSI complements this guidance by helping businesses build the knowledge, skills and confidence they need to meet their legal responsibilities in practice. Through targeted webinars, e-learning and development opportunities, staff can understand changing requirements, improve day-to-day processes and provide better service to customers. Together, the Business Companion website and training offer provide businesses clear, accessible and jargon-free support to build capability, improve compliance and raise standards over the long term.

CTSI is therefore well-placed to provide advice and also signpost consumers to where they need to go to prevent consumer confusion and consumer detriment up front, rather than dealing with issues once they have already occurred.

Codes approved under the Approved Code Scheme offer higher standards of customer service and redress. This because the ACS requires businesses to protect consumers, particularly vulnerable consumers, and requires mandatory access to ADR. The requirements are written into the ACS Core Criteria with which the Code Sponsors and member businesses have to comply. We believe these are the basic essentials of any code scheme. We therefore believe Codes approved under the ACS offer stronger consumer protection.

Government has already recognised that the ACS as a key mechanism for improving consumer protection without the need for costly and burdensome regulation. At the ACS Parliamentary event in October 2025, Kate Dearden, the Consumer Minister in the Department of Business, Innovation, Science and Trade (DBIST) indicated her strong support for the Approved Code Scheme. Since then her officials have indicated a desire to work closely with CTSI on extending the ACS to other high consumer detriment sectors, such as Disability Aids, Used Cars and Home Improvements and putting the Approved Codes on a statutory footing. On 28 August, Government endorsed the ACS to protect families from cowboy builders and aggressive bailiffs: Government steps in to protect families from cowboy builders and aggressive bailiffs - GOV.UK.

Codes approved under the ACS offer a low cost solution for law-abiding businesses by enabling robust self-regulation in sectors that require additional standard setting mechanisms over and above consumer law. Unlike legislation, which can be slow and cumbersome to amend, Codes of Practice approved under the ACS can quickly adapt to changing market practices which means consumers are continually protected. Codes of Practice approved under the ACS are independently assessed and audited by Chartered Trading Standards Practitioners. This drives up standards and are the basic essentials of any code scheme. Code businesses are on the front line of the ongoing fight against rogue traders and other bad practices, thereby helping the Trading Standards profession and Government to protect consumers. The ACS requires Approved Codes to offer Alternative Dispute Resolution (ADR), reducing reliance on costly and resource-intensive legal or judicial routes for consumers seeking redress when things go wrong. In this way, Approved Codes play a key role in developing smarter regulation by avoiding the need for more statutory regulation.

Under Part 4 of the Digital Markets, Competition and Consumers Act 2024 (DMCCA), the Government has strengthened the requirements for ADR Providers, requiring ALL ADR Providers to be accredited. In recognition of CTSI's independence, authority, track record and expertise in ADR accreditation, and our long-standing and constructive relationships with ADR Providers, the Department of Business, Innovation, Science and Trade (DBIST) has conferred ADR functions on CTSI. From April 2026, CTSI is responsible for accrediting, monitoring and reporting on the operation and effectiveness of ADR provision for ALL ADR Providers in non-regulated sectors. CTSI will also be able to uphold the standards of ADR Providers through powers to compel or sanction them to improve performance in the event they do not meet their obligations. The Government's aim with these changes is to help deliver a trustworthy, timely and fair service that consumers and businesses can trust to resolve consumer disputes with improved oversight to monitor standards and ensure consistency. There will be a significant expansion of CTSI's work in this area with over 70 additional ADR Providers to be accredited. CTSI has been given delegated enforcement powers under the DMCCA to issue enforcement notices to ADR Providers who are in breach of accreditation requirements. This is a positive development as for the first time there are legislative sanctions that can be deployed against ADR Providers.

Given its recognition by Government, its independence, robustness and its link to ADR, we believe that the ACS offers effective overarching quality assurance across the non-regulatory landscape. Signposting consumers to a business approved under the Approved Code Scheme would make it easier for consumers to identify trustworthy businesses and help to improve consumer confidence in the sector. It would also provide Government with re-assurance that the highest consumer standards are being maintained, without the risk of commercial interests overriding consumer interests. This would prevent a race to the bottom on consumer protection. The ACS currently covers over 45,000 businesses through 21 Code Sponsors across 22 different Approved Codes in 8 key sectors, including the healthcare and mobility sector.

Mandating redress scheme providers to be accredited by CTSI and mandating redress scheme providers to belong to the ACS would help simplify the landscape for businesses and consumers. This coupled with a marketing campaign to raise awareness of Codes and ADR would help consumers more easily identify trustworthy businesses and get support when required.

CTSI also advocate establishing a licensing scheme for businesses carrying out home improvements work to consumer's homes. Any licensing scheme must include minimum industry standards, membership of an approved Code Scheme and accreditation requirements. Consumer Codes would better protect consumers and businesses and restore consumer trust and confidence in these markets.

Chapter 2: Championing retrofit in a reformed building regulation system

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?

There needs to be independent assessment of any consumer code, coupled with an approved redress scheme to help consumers when things go wrong. This would make it easier for consumers to identify trustworthy businesses and help to improve consumer confidence in the sector. It would provide Government and consumers with re-assurance that the highest consumer standards are being maintained, without the risk of commercial interests overriding consumer interests. This would prevent a race to the bottom on consumer protection.

Chapter 3: A centralised oversight system for government-supported retrofit schemes

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

- **Strongly agree**
- **Agree**
- **Neither agree nor disagree**
- **Disagree**
- **Strongly disagree**
- **Not sure**

Please explain your answer.

We firmly believe that no sector should police itself. There is a risk of commercial interests overriding consumer interests, thereby causing a race to the bottom on consumer protection. There needs to be independent assessment of any consumer code, coupled with an approved redress scheme to help consumers when things go wrong. This would provide Government and consumers re-assurance that the highest consumer standards are being maintained.

The ACS is free from commercial interests, and puts consumers' interests first, ensuring consumers' interests are protected. It was established to give consumers greater confidence when they buy from members of the scheme. Using the ACS would avoid the need to further costly and burdensome legislation impacting businesses.

Codes approved under the ACS offer higher standards of customer service and redress as ADR is also mandated as an integral part of the ACS. We believe these are the basic essentials of any code scheme. Codes approved under the ACS offer stronger consumer protection. Government has recognised that the ACS as a key mechanism for improving consumer protection without the need for costly and burdensome regulation.

Codes approved under the ACS offer a low cost solution for law-abiding businesses by enabling robust self-regulation in sectors that require additional standard setting mechanisms over and above consumer law. Unlike legislation, which can be slow and cumbersome to amend, Codes approved

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under the ACS can quickly adapt to changing market practices which means consumers are continually protected. Codes of Practice approved under the ACS are independently assessed and audited by Chartered Trading Standards Practitioners. This drives up standards and are the basic essentials of any code scheme. Code businesses are on the front line of the ongoing fight against rogue traders and other bad practices, thereby helping the Trading Standards profession and Government to protect consumers. The ACS requires Approved Codes to offer ADR, reducing reliance on costly and resource-intensive legal or judicial routes for consumers seeking redress when things go wrong. In this way, Approved Codes play a key role in developing smarter regulation by avoiding the need for more statutory regulation.

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

- **Yes**
- **No**

We agree that there needs to be responsibility and accountability to ensure that consumer interests are protected. We believe that no sector should police itself. However, we do not believe it is necessary for Government to be directly responsible for delivering specific functions. There needs to be independent assessment of any consumer code, coupled with an approved redress scheme to help consumers when things go wrong. This would make it easier for consumers to identify trustworthy businesses and help to improve consumer confidence in the sector. It would provide Government and consumers with re-assurance that the highest consumer standards are being maintained. A not for profit scheme such as the ACS, which has consumers interests at its heart, would avoid the risk of commercial interests overriding consumer interests, thereby preventing a race to the bottom on consumer protection.

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

N/A

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

We firmly believe that no sector should police itself. There needs to be independent oversight and assessment of any consumer code, coupled with an approved redress scheme to support consumers when things go wrong. We also believe that the sector should decide for itself how many code providers there should be in a sector. More than one code provider can encourage competition and drive up business standards. Limiting code providers to one per sector with no independent oversight is likely to reduce consumer protection.

The single consumer protection system could effectively be delivered through a single front door for consumers which can direct consumers to the relevant code sponsor.

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

- **To a large extent**
- **To some extent**
- **To a limited extent**
- **Not at all**
- **Not sure**

Please explain your answer.

As mentioned above, we believe that the sector should decide how many code providers there should be in a sector. More than one code provider can encourage competition and drive up business standards. Limiting code providers to one per sector with no independent oversight is likely to reduce consumer protection. The single consumer protection system could be more effectively delivered through a single front door for consumers which can direct consumers to the relevant code sponsor.

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

- **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.**

Any grant funded work should include a strict requirement for post installation independent auditing/inspection with appropriate action and audit results which are shared with the relevant local Trading Standards services. Under the ACS, code sponsors are already required to provide annual reports to the ACS Board.

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

- **Yes**
- **No**
- **Not sure**

If No, please explain your answer.

Yes, but there needs to be independent oversight and assessment of any consumer code, coupled with an approved redress scheme, ADR, to support consumers when things go wrong.

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**
- **No**
- **Not sure**

Please explain your answer.

There needs to be independent oversight and assessment of any consumer code, coupled with an approved redress scheme to support consumers when things go wrong.

Chapter 4: Simplifying and improving the consumer journey for retrofit projects

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

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not sure

12. Which aspects of the proposed consumer journey are most likely to improve consumer outcomes? Select all that apply:

- 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
- Centralised case management by the consumer protection service
- Other (please specify in your written response)
- None of the above

Please explain your answer.

Consumers have found it impossible to navigate the sector to make a complaint or have their problem remedied. Consumers were passed from the contractor, TrustMark, the energy firms, OFGEM etc. with no one organisation taking accountability. TrustMark approved businesses were able to subcontract out to non-TrustMark approved businesses. This added layer of confusion and was likely done to meet demand. Trading Standards saw a lot of businesses phoenixing from installers to removers and targeting the same consumers, so they were ripped off during the installation and then again when the problems needed to be put right.

There are examples of the same individuals having five or more companies registered with slight tweaks to their company names, but all related to green energy and home improvements.

We agree that the consumer journey should be clear and easy to navigate. It should be designed around how consumers behave in practice and seek help, rather than expecting them to assuming they understand the often complex relationship between installers, certification bodies, guarantee providers, consumer codes, ADR schemes and regulators.

A single point of contact would help consumers identify where responsibility sits when problems arise. Any future initiative or scheme needs to have consumer advice built in. CTSI already has a proven track record in delivering simple, proactive, relevant, modern and informative advice and education that supports consumers and businesses alike. CTSI operates the Government supported UK International Consumer Centre (UKICC). This provides free, impartial advice to consumers when they encounter problems when buying goods and services from outside the UK.

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

It is important to recognise that vulnerability is often situational or market place and can arise through financial hardship, loss of heating, ill-health, bereavement, caring responsibilities, digital exclusion or simply the stress associated with major home improvement works. Also recognising that organisations and business can cause or exacerbate that vulnerability. Accessible communication channels, trusted representatives, priority handling of urgent cases and staff training on vulnerability should all form part of the framework.

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

Any new system should minimise unnecessary burdens on compliant businesses by adopting risk-based auditing, reducing duplication of assessments, recognising existing certifications and facilitating better intelligence sharing between oversight bodies. Statutory regulatory solutions add costs which are invariably passed onto consumers, and can affect competition.

<u>Chapter 5: Strengthening technical and professional frameworks</u>

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

• To some extent

• To a limited extent

• Not at all

• Not sure

Please explain your answer.

Previous energy savings schemes did not have any protections built in to ensure that installers held any qualifications or skills, resulting in unsuitable installations which affected consumers homes, and in many cases led to spiralling costs for consumers to remedy.

There was a huge problem with businesses losing their scheme approval. Consumers who were in the process of installing retrofit products were unable to obtain completion certificates and so could not claim their Home Energy Savings loans or smart export guarantee. The businesses misled people by not telling them they had lost their approval or claiming to still have it. There was no contingency to assist those consumers who were mid-installation. So consumers had to get another approved business to fix the issue at a cost to them.

In Scotland there were major problems with loft insulation. However, the work did not always fall under any scheme. Traders claimed to work on behalf of the government.

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

Whilst stronger technical competence requirements are welcome, competence should extend beyond technical qualifications and include:

- Consumer protection law
- Complaint handling
- Vulnerability awareness
- Communication skills
- Professional conduct
- Poor consumer outcomes often arise through communication failures and poor customer care rather than technical shortcomings alone.

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

• 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.

There needs to be independent oversight and assessment of any consumer code, coupled with an approved redress scheme to support consumers when things go wrong. Oversight arrangements should also include stronger audit requirements, mandatory reporting of serious consumer detriment, improved intelligence sharing and stronger links between certification bodies, ADR/Ombudsman providers and Trading Standards.

18. 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.

Any new system should minimise unnecessary burdens on compliant businesses by adopting risk-based auditing, reducing duplication of assessments, recognising existing certifications and facilitating better intelligence sharing between oversight bodies. Statutory regulatory solutions add costs which are invariably passed onto consumers, and can affect competition.

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

Oversight arrangements should also include stronger audit requirements, mandatory reporting of serious consumer detriment, improved intelligence sharing and stronger links between certification bodies, ADR/Ombudsman providers and Trading Standards.

Chapter 6: Earlier detection and stronger enforcement processes

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

• Strongly agree

• Agree

• Neither agree nor disagree

• Disagree

• Strongly disagree

• Not sure

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

CTSI and Trading Standards strongly supports an intelligence-led and risk-based approach.

In addition to complaints, audit failures and guarantee claims, risk indicators include:

- Director disqualification records
- Insolvency events
- Frequent company name changes
- Repeated changes in trading identity
- Movement between certification schemes
- Enforcement history
- Local authority intelligence
- We are increasingly seeing businesses appear as "new" Companies House registrations when in reality they are existing businesses operating under different names or corporate structures.

Risk-based oversight should therefore utilise Companies House intelligence, director histories, previous trading names and insolvency records. This would allow earlier identification of emerging risks and reduce opportunities for businesses to avoid scrutiny.

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

• To a large extent

• To some extent

• To a limited extent

• Not at all

• Not sure

Please explain your answer.

While graduated compliance is appropriate for administrative failings and minor non-compliance, there should be provision for immediate intervention where there is evidence of:

- Fraud
- Deliberate misconduct
- Significant consumer harm
- Safety risks
- Persistent non-compliance

In addition, consumers should not lose protection simply because a business changes its name, dissolves, becomes insolvent, leaves a scheme or transfers activities to another entity. The framework should therefore consider previous trading names, connected companies, director histories and beneficial ownership structures to prevent avoidance of liabilities through corporate restructuring.

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

We support inclusion of a stronger role for ADR/Ombudsman. It should be mandatory to offer ADR. Where businesses participate in accredited ADR schemes, consideration should be given to ensuring ADR decisions are binding on participating businesses. This would reduce unnecessary re-litigation in court and avoid consumers having to repeat the same dispute through the courts, strengthen consumer confidence.

Repeated failure to comply with ADR decisions should be treated as a risk indicator and trigger enhanced scrutiny and enforcement activity.

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

It should be made mandatory to offer ADR. Where businesses participate in accredited ADR schemes, consideration should be given to ensuring ADR decisions are binding on participating businesses.

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

- Option 1
- Option 2
- Neither
- Another approach
- Not sure

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

No comment.

25. 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.

Consumers have found it impossible to navigate the sector to make a complaint or have their problem remedied. Consumers were passed from the contractor, TrustMark, the energy firms, OFGEM etc. with no one organisation taking accountability. TrustMark approved businesses were able to subcontract out to non-TrustMark approved businesses. This added layer of confusion and was likely done to meet demand. Trading Standards saw a lot of businesses phoenixing from installers to removers and targeting the same consumers, so they were ripped off during the installation and then again when the problems needed to be put right.

It is of concern when traders sub-contract and do not carry out their own due diligence checks of those sub-contractors. Responsibility and liability must rest with the original trader.

Chapter 7: Swift remediation and redress

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

• Strongly agree

• Agree

• Neither agree nor disagree

• Disagree

• Strongly disagree

• Not sure

Please explain your answer.

Redress schemes should be supported by independent ADR and Ombudsman services, helping to simplify access for consumers and improve intelligence gathering across the sector.

CTSI has a proven track record in accrediting ADR Providers in the non-regulated sector. CTSI has had responsibility for accrediting ADR Providers since 2015. In recognition of Government's trust in CTSI, in 2026 we were appointed as the Competent (Relevant) Authority for accrediting ADR Providers under the Digital Markets, Competition and Consumers Act 2024. This would present a cost-effective solution.

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

• 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.

We recommend that the scope of redress also explicitly includes:

- Failure to comply with ADR decisions
- Misrepresentation of accreditation status
- Misuse of quality marks
- Failure to disclose financial protection arrangements
- Unfair commercial practices
- Aggressive sales practices

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

• Central case management

• Use of guarantees and financial protections

• Access to independent ombudsman

• Defined escalation routes

• Other (please specify in your written response)

Please explain your answer.

Redress schemes should be supported by independent ADR and Ombudsman services, helping to simplify access for consumers and improve intelligence gathering across the sector.

CTSI has a proven track record in accrediting ADR Providers in the non-regulated sector. CTSI has had responsibility for accrediting ADR Providers since 2015. In recognition of Government's trust in CTSI, in 2026 we were appointed as the Competent (Relevant) Authority for accrediting ADR Providers under the Digital Markets, Competition and Consumers Act 2024. This would present a cost-effective solution.

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

• Yes

• No

• Not sure

Please explain your answer.

When problems arise, consumers can be at the mercy of home improvement traders who may disappear or who fail respond to requests for repairs or refunds. Financial protections should remain available where traders cease trading, become insolvent or refuse to engage.

To further protect consumers, consumer payments for home improvements should fall under, and be protected by, section 75 of the Consumer Credit Act 1974. This would include either through a debtor-creditor-supplier agreement or by using a credit card. Section 75 holds the credit company jointly and severally liable with the trader. This currently applies to items costing more than £100 up to £30,000, even if only a deposit is paid in this way. But the maximum limit should be raised to cover the typical costs of home improvement costs. This would provide a fallback for consumers to seek a refund from the credit company lender as well as the trader, if things go wrong.

Consideration should also be given to strengthening the protections under section 75 Consumer Credit Act 1974 and reviewing transaction limits to reflect the increasing cost of modern retrofit and home improvement works.

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

• Yes

• No

• Not sure

Please explain your answer.

Whilst a solidarity fund should only operate as a measure of last resort, it could provide an important safety net where businesses have failed, financial protections are exhausted and no responsible party can be identified.

We wondered whether the obligations should extend to warranties or insurance which could be used to pay for redress when things go wrong.

Chapter 8 Market impacts

31. 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.

Any new system should minimise unnecessary burdens on compliant businesses by adopting risk-based auditing, reducing duplication of assessments, recognising existing certifications and facilitating better intelligence sharing between oversight bodies. Statutory regulatory solutions add costs which are invariably passed onto consumers, and can affect competition.

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

- Increase participation
- No impact
- Decrease participation
- Not sure

Please explain your answer.

Any new system should minimise unnecessary burdens on compliant businesses by adopting risk-based auditing, reducing duplication of assessments, recognising existing certifications and facilitating better intelligence sharing between oversight bodies. Statutory regulatory solutions add costs which are invariably passed onto consumers, and can affect competition.

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

Any new system should minimise unnecessary burdens on compliant businesses by adopting risk-based auditing, reducing duplication of assessments, recognising existing certifications and facilitating better intelligence sharing between oversight bodies. Statutory regulatory solutions add costs which are invariably passed onto consumers, and can affect competition.

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

Any new system should minimise unnecessary burdens on compliant businesses by adopting risk-based auditing, reducing duplication of assessments, recognising existing certifications and facilitating better intelligence sharing between oversight bodies. Statutory regulatory solutions add costs which are invariably passed onto consumers, and can affect competition.

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?

Any new system should minimise unnecessary burdens on compliant businesses by adopting risk-based auditing, reducing duplication of assessments, recognising existing certifications and facilitating better intelligence sharing between oversight bodies. Statutory regulatory solutions add costs which are invariably passed onto consumers, and can affect competition.