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Government Endorsed Quality



Green Homes Grant Local Authority Delivery: Requirements for TrustMark Scheme Providers

V1.4 (13th December 2021)

This document must be read and used in conjunction with the current version of the TrustMark Framework Operating Requirements and any BEIS, Energy Hub and Local Authority Requirements

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02

Foreword

Green Homes Grant Local Authority Delivery (GHGLAD)

These arrangements apply for the duration of respective GHGLAD phases and may be amended from time to time.

Since inception in 2005 TrustMark has been instrumental, along with our Scheme Providers, in enhancing levels of consumer protection in a range of industry sectors.

The energy efficiency measures carried out under GHGLAD must be completed by a TrustMark Registered Business. This requirement is not mandated by BEIS, but by the Local Authorities themselves. Where TrustMark Registered Businesses install low carbon technologies they must also be registered with the Microgeneration Certification Scheme (MCS).

GHGLAD requires the businesses carrying out the work to record information about the installation into TrustMark's Data Warehouse, that acts as a repository of information about the work undertaken on the property and associated financial protection mechanisms.

GHGLAD is a government funded scheme whereby up to £500 million of funding is being allocated to Local Authorities in two overall phases, to improve the energy efficiency of homes of low-income, low-EPC rated households across England.

BEIS allows lodgement of work completed under GHGLAD for each specific phase as laid out below:

Phase	Start Date	Closure Date	Notes	Final Lodgement Date
Phase 1a	01/10/2020	31/08/2021		As Phase 1a RECOVERY
Phase 1a RECOVERY	" "	31/01/2022	£200M	28/02/2022
Phase 1b	01/01/2021	31/03/2022		29/04/2022
Phase 2	01/01/2021	31/03/2022	£300M	29/04/2022

This document has been updated to V1.4 primarily to reflect that:

- **A Phase 1a 'recovery' period has been introduced by BEIS that closes on 31st January 2022 and the associated lodgement date has been extended until 28th February 2022**

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The Framework Operating Requirements

3.1 The Framework Operating Requirements:

3.1.1 The Green Homes Grant Local Authority Delivery Requirements for TrustMark Scheme Providers must be read and used in conjunction with the current versions of the Framework Operating Requirements (FOR), any requirements set by BEIS and any specific Energy Hub and Local Authority requirements.

The following sections from the FOR, with their principles and Scheme Provider responsibilities, will remain uniform in the delivery of GHGLAD:

- 04. Scheme Provider Application & Registration
 - 05. Standards & Competency
 - 06. Audit & Compliance
 - 07. Enforcement & Sanctions
 - 08. Dispute Management
 - 09. Consumer Safeguarding
 - 10. Financial Protection
 - 11. Brand Governance
 - 12. Communications
 - 13. Assessment & Design
 - 14. Monitoring & Evaluation
 - 15. Product Suitability
 - 16. Data & Information Sharing
 - Annex A - Applicant & Registered Business Requirements
 - Annex B - Energy Efficiency
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Registered Business Eligibility

The addition of the Green Homes Grant Local Authority Delivery Requirements for TrustMark Scheme Providers will be in place for the duration of GHGLAD as determined by BEIS and Local Authorities. All installations carried out under GHGLAD must comply with the conditions of the current version of the overarching TrustMark Framework Operating Requirements.

4.1 Registered Business Eligibility:

4.1.1 The certification standards in the table below apply during the respective GHGLAD phases:

Phase	From	To	Certification Standards	Notes
1a (Including recovery phase closing 31/01/2022)	01/10/2020	31/08/2021	Whatever the Registered Business currently holds for the measure: MCS PAS 2030:2017 (ended 31/10/2021) PAS 2030:2019 PAS 2030:2019 & PAS 2035:2019	Unlike under the Green Homes Grant Voucher Scheme, there is no requirement for measures installed in park homes, high-rise buildings and buildings that are both traditionally constructed and protected to be delivered by a PAS 2030:2019 certificated installer in compliance with PAS 2030:2019 and PAS 2035:2019; unless the installer is certificated to PAS 2030:2019 (see Section 5) or specific Local Authority rules apply. i.e., installers certificated to PAS 2030:2017 can install measures in these types of properties unless specific Local Authority rules apply.
1b	01/01/2021	31/03/2022	Whatever the Registered Business currently holds for the measure: MCS PAS 2030:2017 (ended 31/10/2021) PAS 2030:2019 PAS 2030:2019 & PAS 2035:2019	As above and within context of phase end date.
2	01/01/2021	31/03/2022	MCS PAS 2030:2019 & PAS 2035:2019	Standard PAS 2035:2019 applies unless specific Local Authority rules apply.

Note: The definition of high-rise buildings, protected buildings and traditional construction is as defined in PAS2035:2019.

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- 4.1.2 Businesses undertaking work for GHGLAD must be compliant with the TrustMark Code of Conduct and Customer Charter, any BEIS Terms and Condition and specific Energy Hub and Local Authority Rules.
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- 4.1.3 Financial protection must be provided for all works installed under GHGLAD. The financial protection mechanism¹ must meet the TrustMark FOR - Section 10 and be at least the equivalent of that specified for measures installed under the Energy Company Obligation (ECO) scheme; and be declared within the Data Warehouse.
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- 4.1.4 TrustMark Registered Businesses are required to hold MCS registration for the installation of low carbon and clean heat technology measures.
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4.2 Scheme Provider Requirements:

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- 4.2.1 To ensure that all data submitted for Registered Businesses is accurate including, but not limited to, PAS certification, registered trade scope and business details.
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- 4.2.2 To ensure that Registered Businesses working within GHGLAD are aware of the necessity of lodgement into the TrustMark Data Warehouse.
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- 4.2.3 Scheme Providers who are not UKAS accredited Certification Bodies but wish to offer TrustMark registration for PAS / MCS trades, must have an evidenced formal arrangement with a Certification Body(ies) in order that PAS / MCS scopes, assessments and certification can be validated and kept synchronised with the Certification Body.
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- 4.2.4 Scheme Providers accept responsibility for the standards of delivery of their Registered Businesses and must ensure that all aspects of installation requirements are completed by the registered business.

Scheme Providers will as part of the FOR will undertake investigations and seek resolution for any disputes between the consumer and the registered business.

¹ <https://www.trustmark.org.uk/ourservices/financial-protection>

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UKAS Certification Requirements

Text as published by 25 June 2021²

UKAS PAS 2030 GREEN HOMES COMMUNICATION TO CERTIFICATION BODIES – EXTENSION OF PAS 2030: 2017 EXPIRY UNTIL 31 OCTOBER 2021 FOR THE GREEN HOMES GRANT VOUCHER SCHEME AND LOCAL AUTHORITY DELIVERY PHASE 1.

This Communication relates ONLY to the Green Homes Grant Voucher Scheme (GHGVS) and Local Authority Delivery (LAD) Phase 1. It does NOT relate to any other scheme e.g., LAD Phase 2, Energy Company Obligation (ECO), Social Housing Decarbonisation Fund (SHDF) and Home Upgrade Grant (HUG).

Following the publication of the revised PAS 2030: 2019 in May 2019 BEIS initiated a transition period to ensure that all UKAS-accredited certification bodies had transitioned to the new version of PAS 2030 by 30 June 2020 and their certified installers had transitioned by 30 June 2021. **The expiry date for PAS 2030: 2017 and hence the transition deadline for installers has now been extended until 31 October 2021 for the GHGVS and LAD Phase 1 ONLY.**

In 2020, BEIS, TrustMark and UKAS jointly issued information on the transitional arrangements allowing installations under either the 2017 or 2019 versions of PAS 2030 for a limited period for installers delivering under the GHGVS.

In order to facilitate implementation of the GHGVS and LAD Phase 1, BEIS has made further changes to the transitional policy as follows:

1. PAS 2030 certified installers that have transitioned from PAS 2030:2017 certification to PAS 2030:2019 certification can have their 'superseded' PAS 2030:2017 certification recognised alongside their PAS 2030:2019 certification; thus, for GHGVS and LAD P1 only, they are permitted to work in compliance with either standard of their certification and scope until 31 October 2021.

Note: Where an installer has no relationship with the Certification Body that issued the PAS 2030:2017 certification (e.g., they have moved Certification Body to obtain PAS 2030:2019 certification) recognition of PAS 2030:2017 certification may not be possible; this will be dependent on the services offered by the PAS 2030: 2017 Certification Body.

2. All work **COMPLETED** after 31 October 2021 by a PAS 2030 certified installer must be in compliance with their PAS 2030:2019 certification and carried out in accordance with PAS 2035:2019.

Any PAS 2030:2017 certificate that has been issued under this arrangement must be transitioned by the 31 October 2021 or the certificate will lapse.

All other applicable rules and requirements apply including but not necessarily limited to those defined by BEIS, UKAS, Ofgem and TrustMark.

² <https://www.ukas.com/resources/latest-news/extension-of-pas-20302017-expiry-for-green-homes-grant-voucher-scheme/>

Please note:

- a) Certification to PAS 2030:2019 requires compliance with all the requirements of that standard.
- b) All UKAS- accredited PAS 2030 certification bodies have had their accreditation schedules updated to PAS 2030:2019 as required by the BEIS transitional requirements. The BEIS 'flexibility arrangements' for the interim period for the GHGVS and LAD Phase 1, mean that this accreditation will be recognised as also allowing certification to the 2017 version of PAS 2030 for the limited period until 31 October 2021.
- c) Installers will only be able to install measures for which they hold certification and for which their certification body holds accreditation.
- d) For delivery under GHG LAD Phase 2, SHDF, ECO and HUG installers must be certified to PAS 2030:2019 and compliant with PAS 2035:2019.

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Eligible Measures & Installation Standards

6.1 Eligible Measures:

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- 6.1.1 For GHGLAD, eligible measures are any energy efficiency and heating measures compatible with the Standard Assessment Procedure (SAP) that will help improve EPC Band D, E, F or G rated homes. This includes, but is not limited to, measures such as wall, loft and underfloor insulation, as well as low carbon technologies and solar photovoltaics.

Fossil fuel measures, such as the installation of a new fossil fuel-based heating system, or the replacement or repair of an existing fossil fuel-based heating system with another fossil fuel-based heating system, are not in scope.

The eligible measures are as listed in the current version of the lodgement Data Dictionary applicable to GHGLAD which is available on the TrustMark website here:

<https://www.trustmark.org.uk/ourservices/data-warehouse>

Eligible measures may be subject to specific Local Authority project rules.

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- 6.1.2 All measures within the GHGLAD installed to PAS 2030:2017 must meet the minimum ventilation requirements of PAS 2030:2017 section A5 and tables A4/5/6. Ventilation requirements must be satisfied and evidenced in full for the installation to be PAS compliant.

It is recognised under PAS 2030:2017 ventilation requirements are recommendations, yet under the TrustMark GHGLAD requirements, these are mandatory requirements.

In all cases where the installation of an insulation measure is undertaken, the property must have ventilation requirements completed in line with either PAS 2030:2017 or as per the requirements of PAS 2035:2019 and PAS 2030:2019 depending upon the installation methodology used.

6.2 Installation Standards:

6.2.1 All measures must be installed in line with the requirements of standards below and within the context set out in Section 04 of this document:

- MCS Standards
- PAS 2030:2017
- PAS 2030:2019
- PAS 2030:2019 & PAS 2035:2019

6.2.2 For under-floor insulation, Registered Businesses are also required to follow the BEIS “Guide to Best Practice” Retrofit Floor Insulation- Suspended Timber Floors July 2020; and any other guides of similar status relating to other measures that may be introduced or any official industry interim guidance produced.

6.2.3 Refer to the table below for measures that have additional requirements:

Scenario	Technical risk	Risk reduction
Intervention		
Internal Wall Insulation	Technical risks where installed services create an obstacle within the structure	<p>Partial internal wall insulation treatment of properties can be fraught with issues. The temperature differential between rooms or areas can create the ideal conditions for condensation. Thermal bridges become extremely difficult to eliminate, giving further grounds for concern.</p> <p>The best solution is always treating the whole or 100% of the external envelope of the building. Should this not be feasible then a medium term retrofit plan through the PAS 2035 route should always be the best solution.</p>
Solid Wall Insulation	Technical delivery risks may be presented and create additional challenges that would require further considerations.	Where a (pre-design) building survey or assessment identifies issues regarding conditions or installation challenges, these situations must be addressed prior to installation.
Low carbon heating	The design of the heating system is critical to the successful installation of a low carbon heating source.	System design which considers the house fabric must be completed and recorded in accordance with the relevant MCS standards requirements before the installation of low carbon heating measures (s).

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Data Warehouse Lodgement

7.1 Lodgement of Measures:

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- 7.1.1 All installations under PAS 2030:2017 for GHGLAD will require lodgement within the TrustMark Data Warehouse by the responsible business.
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- 7.1.2 Work delivered to PAS 2035:2019 must be lodged by a TrustMark registered Retrofit Coordinator.
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- 7.1.3 The GHGLAD lodgement fee will be £30.00 + VAT.
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7.2 Lodgement evidence in the Data Warehouse

7.2.1 The following evidence will be required for lodgement of GHGLAD measures (excluding PAS2035:2019 which will follow the existing process):

- Building Survey (Pre-Design)
- EEM Design
- Pre-installation Building Inspection
- Mid-install Inspection
- Handover Documents
- PAS 2030 Declaration of Conformity
- Guarantee / Financial Protection mechanism
- For MCS technologies the MCS Certificate Number will be required

7.2.2 Initially lodgement will be made directly into the Data Warehouse; the short timescales may mean that an API may not be practical, and Scheme Providers must make provisions for monitoring registered businesses.

7.2.3 Where the installation requires notification of Building Regulations, a self-declaration statement will be required before submitting a lodgement.

7.2.3 Last date for lodgement:

- **Phase 1a and Recovery Phase – 28th February 2022**
 - **Phase 1b – 29th April 2022**
 - **Phase 2 – 29th April 2022**
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Audit and Compliance

8.1 Audit & Compliance:

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- 8.1.1 TrustMark reserves the right to undertake an audit on any measures that have been completed under GHGLAD.
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- 8.1.2 Audits will be performed and TrustMark may make Scheme Providers aware of audit non-conformity for follow up and resolution.
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- 8.1.3 Where non-conformity is identified TrustMark may notify the relevant Local Authority and any other relevant party.
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- 8.1.4 Where a lodgement or work remains non-compliant after all relevant quality assurance processes have been applied, further action will take place under the TrustMark quality assurance process.
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