

# The TrustMark Consultation Response for:

TrustMark Licence Plus for The  
Great British Insulation Scheme  
**and for**

TrustMark Strengthening of  
Financial Protection.





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# 01

## General Information

**Publication date:** 7<sup>th</sup> April 2025

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# 02

## Document Purpose and Scope

This document sets out the TrustMark response to our consultation on the proposed iteration of TrustMark Licence Plus (TMLP) for the Great British Insulation Scheme (GBIS), its associated financial protection, and for the TrustMark proposals for strengthening financial protection beyond TMLP for GBIS.

Whilst TrustMark is mindful of several areas that some respondents have taken the time and opportunity to express views in connection with, this document does not progress situations that were not within the scope of the proposed TMLP for GBIS or the proposals around aligning and strengthening financial protection. These areas include those such as, whether the PAS 2030 delivery framework is fit for purpose, the construct, delivery or funding of ECO4 or GBIS measures, whether TMLP for GBIS should be utilised under these schemes; and the wider uptake/challenge of energy efficiency home improvements; or practicalities concerning the planning system.



# 03

## Executive Summary

The TrustMark consultation ran from 14<sup>th</sup> November to 12<sup>th</sup> December 2024. The consultation presented proposals for a version of the TMLP specifically for GBIS for the installation of loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation). The consultation included proposals for financial protection requirements aimed to complement the streamlined installation process. This initiative was developed after close working with the Department for Energy Security and Net Zero (DESNZ) and an industry working group facilitated by the Department.

The consultation also included proposals related to TrustMark's wider ambition of strengthening financial protection for the use under government grant funded and capital schemes and ECO.

The decision as to whether the proposed iteration of TMLP should be utilised for GBIS was a matter for DESNZ. Based on the DESNZ response to its *Energy Company Obligation 4 and the Great British Insulation Scheme: Mid-scheme Changes* consultation, it has been decided not to proceed with the utilisation of TMLP for GBIS at this time for the reasons laid out in the DESNZ response paper. The DESNZ consultation response can be found here:

<https://www.gov.uk/government/consultations/energy-company-obligation-4-and-the-great-british-insulation-scheme-mid-scheme-changes>

TrustMark would like to thank those who participated in the DESNZ facilitated working group that supported the development of the version of Licence Plus proposed for GBIS.

Whilst fully respecting and accepting the DESNZ decision, TMLP for GBIS received a wide level of support and some valuable feedback has been presented via the TrustMark consultation, and we will consider how this might be utilized in the future.

Regarding TrustMark's wider ambition of strengthening financial protection for the use under government grant funded and capital schemes and ECO as included in our consultation. The proposals were broadly supported but will not be taken forward at this time.

Along with DESNZ, we remain committed to strengthening financial protection and will engage further with stakeholders in a bid to establish practicable methodologies so that the overall proposals may be taken forward in the future. This in context of considering feedback received including that about alignment of requirements such as under Competent Persons Schemes or within the low carbon and renewables sector, approval and claims processes, consumer information, and methodological challenges in creating policies.

TrustMark is appreciative of the interest the sector took in our consultation, and we received a total of 58 responses. We would like to take this opportunity to thank those that took the time and effort to respond. All responses have been reviewed and considered, and have been summarised by key themes, although we have not specifically referenced the detail of every single response we received within this document.



# 04

## Construct of the TrustMark Licence Plus for the Great British Insulation Scheme

This section deals with the responses received in relation to the construct of the TMLP for GBIS.

Consultation Question	
1.	<p>Do you agree with the proposal that if a property falls outside the scope of TMLP for GBIS, then the existing PAS 2035 process will apply? Properties to be regarded as out of scope of TMLP for GBIS include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> <li>• High-rise buildings</li> <li>• Heritage properties</li> <li>• Properties where a non-typical design would apply</li> <li>• Properties where non-typical access applies</li> <li>• Properties where existing mould, condensation and/or damp issues are identified</li> </ul> <p>Yes: <b>38</b> No: <b>9</b></p> <p>Percentage of those that responded to this question that agreed: <b>81%</b></p> <p>Written responses: 17</p> <p><i>11 respondents provided no view on this question.</i></p>

### Key Response Themes

Strong support was shown for the proposed scope of TMLP for GBIS and the requirement for certain types of property to be handled via the PAS 2035 process due to their complexity, as can be seen by the percentage of responses in agreement.

Feedback was provided around the need for clear definitions of the terms "high-rise," "heritage properties," "non-typical design," and "non-typical access". Likewise, ensuring the relevance/appropriacy of the overall scope of TMLP for GBIS.

Respondents that disagreed with the proposed scoped introduction of TMLP for GBIS included views about complexity of more than one standard being in play, how it may impact whole house retrofit and that if a simpler single measure approach is required it should be an inclusion of the PAS 2035 specification.

### TrustMark Response

Based on the DESNZ consultation outcome decision, loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation), within GBIS (and ECO) will continue to be delivered under the PAS 2035/2030 process.



Consultation Question	
2.	<p>Do you agree that the inclusion of the PAS 2030 principles of Pre-Installation Building Inspection and independent audit of Pre-Installation Building Inspections in the TMLP for GBIS, creates a mechanism to support ensuring that the property is suitable for the measure to be installed?</p> <p>Yes: <b>37</b> No: <b>11</b></p> <p>Percentage of those that responded to this question that agreed: <b>77%</b></p> <p>Written responses: 21</p> <p><i>10 respondents provided no view on this question.</i></p>

### Key Response Themes

The proposal was supported as can be seen above and with reasons including existing sector understanding and experience of the process.

Some feedback was received that while independent audits can improve quality, they might also slow down and complicate the installation process by adding unnecessary oversight (and cost) to competent/certified parties.

Further details of how the process will independently work, be overseen and monitored were sought.

Criticism of the current PAS regime has been provided; with concerns that the current PAS 2030 regime is not functioning effectively, with issues in oversight and accountability and that adopting similar principles in TMLP may allow this to persist.

Comments were provided in relation to the inclusion of BS 40104 that is expected to be published soon (this standard will aim to provide improved standardisation of the method and delivery of Retrofit Assessment)<sup>1</sup>.

Of the respondents that disagreed with the proposal some included views that PAS 2030 should apply in full, that the added safeguard of independent audit was of questionable value and could cause confusion.

### TrustMark Response

Based on the DESNZ consultation outcome decision, loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation), within GBIS (and ECO) will continue to be delivered under the full PAS 2035/2030 process.

<sup>1</sup> <https://standardsdevelopment.bsigroup.com/projects/9021-05901#/section>



Consultation Question	
3.	<p>Do you agree that incorporating the requirement that where the installer completes the installation design the personnel involved must be different from those undertaking the installation itself, will support upholding compliant installations by helping manage any conflict of interest?</p> <p>Yes: <b>24</b> No: <b>23</b></p> <p>Percentage of those that responded to this question that agreed: <b>51%</b></p> <p>Written responses: 26</p> <p><i>11 respondents provided no view on this question.</i></p>

### Key Response Themes

Of the respondents who provided a view, a slender majority agreed with the proposal.

Of the respondents that disagreed with the proposal some cited delays to completing installations, increased cost, installers holding qualification should be trusted, and that smaller companies would be challenged in meeting the requirement. Some respondents pointed out that often the installer is the designer for low-risk measures and others pointed out that PAS 2035 principles allow commercial entities to appoint other favoured commercial entities. Some feedback proposed that post-installation checks could manage conflicts of interest.

### TrustMark Response

Based on the DESNZ consultation outcome decision, loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation), within GBIS (and ECO) will continue to be delivered under the PAS 2035 design process.



Consultation Question	
4.	<p>Do you think that incorporating the requirement of independent assessment of post installation evidence within the TMLP for GBIS will support the delivery of compliant installations?</p> <p>Yes: <b>26</b> No: <b>17</b></p> <p>Percentage of those that responded to this question that agreed: <b>60%</b></p> <p>Written responses: 26</p> <p><i>15 respondents provided no view on this question.</i></p>

### Key Response Themes

Overall, there was support for independent assessment of post-installation evidence.

Requests for information are sought on the nature of the post completion evidence that will be required including any need for time and location stamped photographs and how desktop audit and onsite audits can work together effectively.

Of those that disagreed with the proposed requirement some stated that it created unnecessary/unreasonable time and cost, would not increase compliance/quality, that site visits are a truer measure of compliance, administrative burden and delay would be created, and that post installation evidence should be collated and held by the installer.

### TrustMark Response

Based on the DESNZ consultation outcome decision, loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation), within GBIS (and ECO) will continue to be assessed for compliance under existing processes.





Consultation Question	
5.	<p>Are there any other aspects or issues in respect of the construct of TMLP for GBIS that you believe require consideration?</p> <p>Yes: <b>30</b> No: <b>15</b></p> <p>Percentage of those that responded to this question that believed further consideration to be required: <b>67%</b></p> <p>Written responses: 30</p> <p><i>13 respondents provided no view on this question.</i></p>

### Key Response Themes

Comments have been received in response to this question that were generally reflective of those received in response to the preceding four questions and as follows.

- Some respondents believe that the PAS 2035/2030 process is the (only) correct approach for all property types, and some with unease that the introduction of TMLP for GBIS might cause confusion and/or limit further improvements on other funding routes. Feedback has been received advocating for a whole-house approach and not moving away from that, arguing that single-measure interventions are risky and that planned interventions need to be considered holistically.
- Some views have been supplied about the costs and requirements associated with the TMLP for GBIS, which could make it financially unviable for companies to proceed with (the defined) works under the GBIS scheme.
- Some respondents felt that consumer protection risks may be introduced, due to the adoption of TMLP for GBIS, if it introduces alternative standards compared to PAS 2035/2030.
- There is also a call for more focus on measuring, metering, and monitoring performance.
- Some respondents sought further guidance, expedited processes and rules for participation (including clarity around "working towards" PAS 2030 to carry out TMLP for GBIS installations), monitoring (adequacy of the design and installation) and remediation processes with some seeking further alignment between TMLP and PAS processes.
- There was a request for clarity on when ventilation upgrades are mandatory and the standards to be followed with a preference to building regulations compliance (as the minimum).
- Some comments related to the TMLP for GBIS Proposed Construct - Overview Diagram in terms of the sequence of the production of the design and the carrying out of the pre-installation building inspection.

### TrustMark Response

Based on the DESNZ consultation outcome decision within the response to its Energy Company Obligation 4 and the Great British Insulation Scheme: Mid-scheme Changes consultation, loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation), within GBIS (and ECO) will continue to be delivered under the PAS 2035/2030 process.



# 05

## Financial Protection for the TrustMark Licence Plus for the Great British Insulation Scheme and Beyond

This section focuses on the responses received in relation to the financial protection required for TMLP for GBIS and in relation to TrustMark's wider ambition of strengthening financial protection for the use under government grant funded and capital schemes and ECO.

Consultation Question	
6.	<p>Do you agree with the proposals in the TMLP for GBIS for financial protection mechanisms to complement the proposed streamlined installation requirements? I.e. to cover rectification of failed measures and consequential damage arising directly from the failed measure, product and workmanship including assessment and design, coverage in the event of the installer ceasing to trade or failing to rectify to a maxima of £20,000 with financial compensation as a last resort and covering a period of at least six-years for loft insulation and two-years for heating controls.</p> <p>Yes: <b>25</b> No: <b>13</b></p> <p>Percentage of those that responded to this question that agreed: <b>66%</b></p> <p>Written responses: 19</p> <p><i>20 respondents provided no view on this question.</i></p>

### Key Response Themes

Most respondents agreed with the proposals, emphasizing the importance of consumer protection and supporting the £20,000 coverage and six-year guarantee for loft insulation.

There were, however, some potential challenges that were highlighted for consideration that may impact on delivering these proposals.

Six-year boiler financial protection is likely to be problematic for financial protection providers, where boilers are provided with a manufacturer's warranty that is less than six-years. Concern was also raised about consumers in fuel poverty being unable to comply with boiler servicing requirements on cost grounds, leading to invalid financial protection.

Concern was also raised about the feasibility of extending the duration of financial protection for loft insulation due to the significant risk of disturbance by householders within the guarantee period, which is likely to invalidate guarantees.

There was also a question raised about the overall balance of consumer protection being shifted from the front-end delivery risk mitigation processes to the back-end financial protection mechanisms.



Some respondents fed back that the proposed financial protections may be complex to design, may not be offered by some existing providers (or cause market shrinkage), will increase costs, potentially restricting delivery and making the scheme less financially viable for installers.

Feedback was also provided highlighting that the sector has existing financial protection requirements and a suggestion that the existing processes under the funded schemes can be confusing to customers and that where changes are made the opportunity should be taken to improve accessibility on the basis that a consumer may not be aware of all the parties in the installation delivery chain. Likewise, the new proposals might be overly burdensome/disproportionate for 'lower risk' measures or may cause further confusion.

### **TrustMark Response**

On the basis that TMLP for GBIS is not being taken forward at this time we will not be making changes to financial protection requirements. We remain committed to supporting the appropriate development and strengthening of financial protection mechanisms, we will continue to engage with DESNZ and key stakeholders for this purpose.



Consultation Question	
7.	<p>Are there any other aspects or issues in respect of financial protection for TMLP for GBIS that you believe require consideration?</p> <p>Yes: <b>17</b> No: <b>19</b></p> <p>Percentage of those that responded to this question that believed further consideration required: <b>47%</b></p> <p>Written responses: 13</p> <p><i>22 respondents provided no view on this question.</i></p>

### Key Response Themes

Responses to this question included similar themes to question six responses plus some notable additions:

- The definition and scope of 'cease to trade' including installer retirement.
- The scope of cover and conditions that trigger the financial protection mechanism.
- Views as to how financial protection is authenticated, accessed, applied, and is effective, along with how policies interact with the Consumer Credit Act 1975, sections 56 and 75.

### TrustMark Response

Again, and as above, on the basis that TMLP for GBIS is not being taken forward at this time, we will not be making changes to financial protection requirements. We remain committed to supporting the appropriate development and strengthening of financial protection mechanisms, we will continue to engage with DESNZ and key stakeholders for this purpose.



Consultation Question	
8.	<p>Do you agree with the proposals to increase the duration of financial protection for loft insulation and gas boilers to a period of at least six-years and that changes should apply to other government funded schemes and ECO?</p> <p>Yes: <b>31</b> No: <b>8</b></p> <p>Percentage of those that responded to this question that agreed: <b>80%</b></p> <p>Written responses: 16</p> <p><i>19 respondents provided no view on this question.</i></p>

### Key Response Themes

Most respondents agreed with the proposals; yet whilst that is the case some views have been presented reflective of responses to question six and as follows:

- Reiteration of the challenges in relation to the actual feasibility of financial protection providers delivering six-year boiler financial protection where boilers are provided with a manufacturer's warranty that is less than six-years.
- Observations around requirements for boiler servicing and property maintenance to maintain the financial protection and the financial impact on those in fuel poverty.
- Reiteration of the implication of loft insulation financial protection effectiveness due to the risk of householder disturbance.
- Clarity of the drivers for the proposed extended duration of financial protection for loft insulation and gas boilers to a period of at least six-years.

### TrustMark Response

Whilst the proposal is not a new consideration, yet based on the feasibility challenges raised by the financial protection community in general via this consultation, and on the basis that TMLP for GBIS is not being taken forward at this time, we will not be making changes to financial protection requirements, including those related to extending the duration of financial protection for loft insulation and gas boilers to other government funded schemes and ECO. We remain fully committed to supporting the appropriate development and strengthening of financial protection mechanisms and durations for loft insulation and gas boilers, we will continue to engage with DESNZ and key stakeholders for this purpose.



Consultation Question	
9.	<p>Do you agree that financial protection mechanisms for all capital or grant funded schemes and ECO must be approved by the TrustMark facilitated independent Financial Protection Panel?</p> <p>Yes:<b>24</b> No:<b>13</b></p> <p>Percentage of those that responded to this question that agreed: <b>65%</b></p> <p>Written responses: 17</p> <p><i>21 respondents provided no view on this question.</i></p>

### Key Response Themes

The proposal is supported by majority, with need for oversight to drive financial protection consistency, effectiveness and outcome was consistently highlighted.

Feedback was provided around the structure, composition and transparency of the Financial Protection Panel and some recommendations for change to strengthen the panel.

Of those respondents who didn't agree with the proposal some submitted views that TrustMark was inappropriately proposing extending its scope of operations or that the function could sit with other bodies that exist in the financial protection sector, including those that actually provide financial protection services.

### TrustMark Response

TrustMark acknowledges and welcomes the feedback provided, including concerns about extending scope of operations. For clarity, the scope of the consultation was in relation to potential changes to the TrustMark Scheme only and matters fully within our scope of operations. The proposed change was to increase the oversight of consumer protection to reduce the opportunity for error leading to poorer outcomes for consumers and to support both Registered Businesses and their Scheme Providers with a comprehensive directory of guarantees that are confirmed to meet Section 10 of the TrustMark Framework Operating Requirements. Where work is delivered outside the TrustMark Scheme our requirements do not apply. On that basis there would be no direct impact on any other organisation in that context.

As announced in the Ministers written statement of 23 January 2025<sup>2</sup>, there are opportunities to simplify the landscape for consumers and we remain committed to supporting and engaging with DESNZ and key stakeholders for this purpose.

<sup>2</sup> <https://www.gov.uk/government/news/action-taken-to-protect-households-with-poor-quality-insulation>



Consultation Question	
10.	<p>If the requirements relating to financial protection mechanisms for all capital or grant funded schemes and ECO change, as proposed, are there any other aspects or issues that you believe require consideration?</p> <p>Yes: <b>23</b> No: <b>12</b></p> <p>Percentage of those that responded to this question that believed further consideration required: <b>66%</b></p> <p>Written responses: 19</p> <p><i>23 respondents provided no view on this question.</i></p>

### Key Response Themes

Opinion and feedback provided included similar themes as per earlier questions responses in relation to financial protection, plus the following:

- Views in relation to alignment of requirements to Competent Persons Schemes and with the low carbon/renewables sector.
- That governance arrangements should be shared publicly and that approved financial protection providers and TrustMark should share more data including that related to compliance, claims, volumes and premiums.
- A consistent application (and definition) of the term 'cease to trade', including retirement and where a trading business unreasonably refuses to rectify a fault.
- More clarity on who is making the requirements for financial protection e.g. TrustMark, the TrustMark Financial Protection Panel or DESNZ.
- The mitigation of barriers for new businesses with limited/no trading history.
- The mandatory inclusion of Alternative Dispute Resolution (ADR) and Independent Ombudsman.

### TrustMark Response

Again, TrustMark acknowledges and welcomes the feedback provided and we remain committed to driving improvements in financial protection delivery and supporting consumers. Some of the feedback provided is not within the scope of TrustMark's sole authority to action as it will require collaboration with a range of organisations and government departments. However, TrustMark will continue supporting the appropriate development and strengthening of financial protection mechanisms, we will continue to engage with DESNZ and key stakeholders for this purpose.





Ensuring that property and home improvement  
businesses deliver quality services with  
effective protection for consumers



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Government Endorsed Quality