TRUSTMARK
Government Endorsed Quality

TrustMark Proposed Scheme Changes

Public Consultation Document

Proposals for a revised scheme to strengthen consumer protection, where TrustMark holds a direct relationship with registered businesses and registered individuals and manages application, registration, on-going suitability, and quality assurance checks, while Scheme Providers confirm business competence, and certification where relevant.

Consultation opens:
22nd September 2026

Consultation closes:
27th October 2026

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1. Consultation Details

Publication date:	**22nd September 2026**
Responses by:	**11:59 pm on 27th October 2026**
Enquiries to:	**consultation@trustmark.org.uk**
Please do not submit consultation responses to the enquiry email address. Any responses submitted via that address will not be considered. To submit consultation responses, see 'How to Respond' below.	
Consultation reference:	TrustMark Registration Scheme Changes
Audiences:	Stakeholders with an interest in strengthened and simplified consumer protection.
Territorial extent:	United Kingdom (references to Competent Persons Schemes England and Wales only).

2. Executive Summary

TrustMark, the UK Government's endorsed quality scheme for home improvement work, is redeveloping key areas of the scheme to strengthen consumer protection.

Recent experience has shown that the current model puts significant burdens and costs on the industry and does not give TrustMark the direct oversight consumers need. TrustMark is determined to explore all options to change that, with input from industry and consumer groups alike.

To strengthen TrustMark's ability to provide consumers with greater protection, while simplifying and reducing the administrative burdens on Scheme Providers[1] at the same time, we propose:

- Establishing a direct relationship with registered businesses and registered individuals (including Retrofit Assessors and Retrofit Coordinators).
- Making TrustMark the single point of escalation for a consumer with a complaint about work delivered under the TrustMark Scheme, to remove the fragmented experience consumers currently face when dealing with multiple parties.
- Managing the application, registration and fee collection functions currently carried out by Scheme Providers.
- Broadening the scope of work that would be recorded in the Data Warehouse, our secure online system for recording completed work and projects, enabling more home improvement work to be within scope of our quality assurance framework.
- Expanding the collection and analysis of data, providing greater insights that can be shared with organisations such as government departments, regulators, industry bodies and local authorities to support their monitoring and policy development around competence infrastructures. This can also support policy developments around consumer protection areas.
- Building on the risk-based quality assurance framework that combines job-level data from the Data Warehouse, AI-enabled analytics and targeted on-site audit.
- Establishing a clearer TrustMark authority to apply sanctions, including financial penalties, suspension and termination where this is appropriate, proportionate and justifiable.
- Strengthening financial protection for consumers.

To support these enhanced activities, TrustMark is considering a range of options for how fees and charges would need to change, with a new pricing schedule that would reflect an appropriate level of quality assurance activity that is reflective of registered business or individual risk.

This document sets out TrustMark's key proposals and invites responses from interested stakeholders, including Scheme Providers, registered businesses and individuals, consumer protection organisations, trade bodies, certification and competence bodies, local authorities, government departments and consumers.

[1] Currently a Scheme Provider is an approved intermediary organisation — typically a trade association, certification body, or inspection body that sits between TrustMark and individual registered businesses. https://www.trustmark.org.uk/scheme-provider/our-scheme-providers

What is Being Proposed to Strengthen Consumer Protection

1 **Direct Relationship Model:** TrustMark would hold a direct relationship with every registered business and registered individual, governed by a binding agreement. It would directly manage registration administration, including application checks, on-going due diligence checks and the collection of registration fees. The key role of Scheme Providers would be confirming and validating the business competence/certification (a potential new revenue stream) and supplying the related data to TrustMark on an on-going basis, as a condition of a business's registration.

2 **Competence Framework:** TrustMark would continue to work with the existing competence infrastructure including that for the skilled trades, PAS 2030[2] and MCS[3] certification, and the schemes that validate Retrofit Assessors and Retrofit Coordinators[4]. As set out under the Direct Relationship Model above, Scheme Providers would provide TrustMark with data about a business's competence/certification status on an on-going basis. This would be made as simple as possible, with use of automated systems where appropriate.

3 **Extended Data Warehouse Lodgement Options:** Lodgement of work requirements would be broadened to drive improved consumer protection by bringing more home improvements under the quality assurance framework. This continues to include where lodgement is mandated for work delivered under government-backed schemes and we will also look to align lodgement with other regulated work areas. A risk-based approach to lodgement obligations is also under consideration.

4 **Quality Assurance:** TrustMark will continue to operate and build upon the established risk-based quality assurance framework, using job-level data from the Data Warehouse, AI-enabled analytics and targeted on-site audit to identify and address non-compliance. It will share relevant data with appropriate bodies to support consumer protection.

5 **A Managed Consumer Complaints Process:** TrustMark would become the primary point of contact for consumers escalating complaints or pursuing dispute resolution in relation to work delivered under the scheme. This is a significant shift from the current model in which complaints are managed through Scheme Providers. It is intended to streamline the process for consumers and businesses, and provide both parties with quicker, easier and more straightforward redress. TrustMark is also considering the right to appoint a third party to carry out remediation works which would be recharged to the original installing business if it fails to act.

6 **Financial Protection:** TrustMark would work to strengthen financial protection by aligning with the National Home Improvement Council (NHIC) Financial Protection Working Group's recommendations and would work to create a last-resort solidarity fund financed by a levy on scheme participants.

7 **Accountability Framework:** TrustMark would create a clear framework which would enable businesses to demonstrate their skills, professionalism and quality of workmanship as a TrustMark registered business or individual. The framework would also create a clear direct authority to impose sanctions, financial penalties, suspension and termination, where appropriate. This would be designed to maintain the standards and integrity of being TrustMark registered, creating clear blue water and competitive advantage between registered and non-registered firms.

8 **Fees and Charges:** Two options for a registration fee structure are currently under consideration. The first option is to maintain a flat fee structure, similar to the current structure. This would apply to all registered businesses, regardless of size. A second option would be to set registration fees under a business-size banding model (sole trader through to large business, aligned to standard UK government definitions). Other options may also be considered. Separate lodgement fees aligned to work risk category are also being considered.

[2] https://www.ukas.com/resources/technical-bulletins/pas-2030-scheme-update-r2/

[3] https://mcscertified.com/

[4] https://www.trustmark.org.uk/business/information-guidance/pas-20352019-pas-20

3. Why Change is Needed

The UK's agenda to move to a low carbon, more energy efficient housing stock, coupled with a Repair, Maintenance and Improvement (RMI) market worth approximately £38.5 billion[5], continues to drive a significant wave of home improvement work. This includes insulation, heat pumps and solar panels along with more general home improvements across all trades.

Done well, this work can transform homes, reduce energy bills and carbon emissions and make people's homes and lives more comfortable. Done badly it can cause real harm. Examples include damp and mould from certain types of poorly fitted insulation, heat pumps that fail to perform as advertised, and stress and inconvenience for consumers.

This is borne out by the continued high levels of non-compliant work being identified in installations of external wall insulation installed through Energy Company Obligation 4 (ECO4) and the Great British Insulation Scheme (GBIS) under the current Find & Fix programme. Consumer and government confidence in the sector has suffered as a result and this needs to change.

Much of this work has been carried out in the homes of people who are least able to challenge poor work or pursue redress when things go wrong. The new model will increase accountability by reducing the current overlap and complexity, providing clearer sight and understanding of responsibilities. Crucially, it will give consumers a clearer, easier route to redress when they need it, along with improvements to consumer protections.

Since its launch in 2005, TrustMark has worked through a sub-licensing model with Scheme Providers, a model designed alongside government, consumer bodies and industry. That model has delivered real benefits and was embraced by the government commissioned Each Home Counts review[6] implementation board. However, the RMI sector is changing and so are the expectations of consumers, consumer protection bodies, government and the RMI sector itself.

The Department for Energy Security and Net Zero (DESNZ) consultation Reforming Consumer Protection for Home Upgrade Schemes[7] (published on 17th June 2026) makes clear that the failures in the design and delivery of ECO4 and GBIS have highlighted significant weaknesses in the current framework. DESNZ is committed to reforming consumer protection for home upgrade measures delivered through UK government schemes, building on the strengths while addressing gaps in how the current system works in practice.

The case for a more direct, transparent and accountable approach is clear. We do not intend to make incremental changes at the margins: a more fundamental shift in how TrustMark oversees registered businesses and individuals is required, and we intend to deliver it, ensuring it works for the consumer and the industry too.

Our proposals will move TrustMark to a direct registration model, strengthening oversight of quality and widening and improving consumer protections. By managing the operational functionality of application, registration and fee collection, we will reduce the administrative burden on our Scheme Providers. The Scheme Provider role is still important, the vital function of confirming and validating the competence and certification (where applicable) of registered businesses and individuals on an on-going basis will be retained as a requirement of TrustMark registration and can provide additional revenue opportunities to Scheme Providers to help offset the cost of these responsibilities.

[5] https://barbour-abi.com/uk-private-housing-rmi-2025-2029-market-size-trends-future-outlook/

[6] https://www.gov.uk/government/publications/each-home-counts-review-of-consumer-advice-protection-standards-and-enforcement-for-energy-efficiency-and-renewable-energy

[7] https://www.gov.uk/government/consultations/reforming-consumer-protection-for-home-upgrade-schemes

4. What this Means for You

TrustMark is proposing important changes to how the quality scheme works. These proposals affect people in different ways. This section sets out what the proposed key changes mean depending on your relationship with TrustMark. Under the proposals, TrustMark is also considering various options for fees structures which are covered here and in Section 14.

Homeowner or consumer	→ The main driver behind TrustMark's proposals for changing is to improve the protections you have when having home improvement work done in your home. → TrustMark will become your single point of contact if something goes wrong with work carried out by a TrustMark registered business or individual. You will no longer need to navigate multiple organisations to raise a complaint. We will manage any escalations on your behalf and ensure that problems are rectified. → In cases where a business fails to rectify defective work, TrustMark's scheme rules provide a mechanism to facilitate remediation, which may include recovery of costs from the original business. → More types of home improvement work will be recorded in TrustMark's secure data system, creating a permanent record of work done in your home and the protections that come with it. → Financial protections on home improvement work carried out under the TrustMark scheme will be developed through TrustMark working to align with the National Home Improvement Council (NHIC) review and recommendations[8] as minded for acceptance by government. → These changes give you more robust protection and ensure any potential problems get dealt with much faster and easier.
Sole trader or micro business (up to 9 employees)	→ Under the proposed new model, TrustMark will hold a direct relationship with you, governed by a binding agreement, and will manage your registration directly, including application checks and collection of your registration fee. Your Scheme Provider's role will be confirming and validating your competence/certification. → Two options around fee structures are currently under consideration. Option 1 is to maintain a flat fee structure, similar to the current structure where fees are charged per business registration, regardless of size. Option 2 is to introduce a new tiered fee structure, with sole traders and micro businesses paying registration fees that reflect the size and capacity of their business. Other options may be considered. → TrustMark's Data Warehouse (our secure online system for recording work) lodgement requirements will be broadened to include more home improvement work. The requirement for full lodgement under the respective government funded schemes will still apply.

[8] https://nhic.org.uk/protect-what-matters/

Small, medium or large business (10+ employees)	→ TrustMark will hold a direct relationship with you through a formal binding agreement, and will manage your registration directly, including application checks and collection of your registration fee. Your Scheme Provider's role will be confirming and validating your competence/certification. → Two options around fee structures are currently under consideration. Option 1 is to maintain a flat fee structure, similar to the current structure where fees are charged per business registration, regardless of size. Option 2 is to introduce a tiered fee structure where, for example, registration fees could be set on a size-based tiered model aligned to standard UK government definitions: – Small (10–49 employees) – Medium (50–249 employees) – Large (250 or more employees). Any fee would reflect the scale of your operations, and the benefits registration brings. Other options may be considered. → Broadened lodgement requirements as per sole trader and micro business applies. → The requirement for full lodgement under the respective government funded schemes will still apply.
Scheme Provider	→ Scheme Providers' role in the proposed TrustMark scheme will be simplified and focused on confirming and validating the competence/certification of businesses referred to you by TrustMark. This is an important quality assurance function and represents a significant change from your current role. Removing the need for application, registration and fee administration will reduce the duplicated administrative burden that the current model creates. → TrustMark will manage application and registration administration, due-diligence checks, and the collection of registration fees for each registered business and individual. New agreements will govern the direct relationship between TrustMark and each registered business and individual, and the confirmation-of-competence/certification arrangements between TrustMark and Scheme Providers. → You will continue to supply TrustMark with data confirming the competence/certification of the businesses you assess. New governance requirements and guidance documents will be produced to support this transition, and the system will be made as simple and efficient as possible, with automated systems where appropriate. → Escalated consumer complaints will be handled by TrustMark as the primary contact point, representing a significant shift from the current model. TrustMark recognises that, taken together, these changes represent a significant reduction in the operational role Scheme Providers currently perform, and is committed to working with Scheme Providers to manage this transition carefully, including discussing how Scheme Providers will be remunerated for the competence confirmation and revalidation service they continue to provide.
Consumer protection body, trade body, regulator or local authority	→ TrustMark's proposed changes strengthen the accountability and transparency of the home improvement sector. → The proposed changes will also provide greater levels of protection for consumers; not only through clearer business/individual accountability but also through the availability of better developed financial protections. → The handling of complaints by TrustMark as a single point of contact will improve clarity for consumers on who to turn to when escalation is required. → Extended Data Warehouse lodgement requirements will mean more work is recorded and encompassed within our quality assurance framework, richer data and insights that can be shared with appropriate parties. → TrustMark welcomes responses from organisations with an interest in consumer protection and standards delivery.

5. How to Respond

You do not need to respond to every question.
Please focus on the areas most relevant to you or your organisation.

Please note that the questions within this document are for reference purposes only.

Please respond via the online form available at:
www.trustmark.org.uk/pages/trustmark-consultation

Other methods of response may not be considered.

To help us analyse responses efficiently, we ask that you aim to limit each free text answer you provide to **around 500 words per question response**. This is a guide rather than a strict limit – where your role or experience means a more detailed response is necessary, please include the evidence you consider relevant. You do not need to answer every question, please focus on those most relevant to you or your organisation.

Responses submitted after the consultation closure of **11:59 pm on 27th October 2026** may not be considered.

TrustMark will review all responses and publish a summary. Responses may be published unless respondents request confidentiality. The responses will be considered to help inform the final design of the new Scheme ahead of its planned launch in spring/summer 2027.

6. Confidentiality and Data Protection

Disclosure in accordance with UK legislation

Information provided, including personal data, will be handled in accordance with all UK laws including, but not restricted to, UK-GDPR and The Data Protection Act 2018.

Processing of personal data

Any personal data we collect will be handled in accordance with all applicable UK data protection legislation including UK-GDPR and The Data Protection Act 2018. To see how we handle your personal data and information please read our privacy policy; **www.trustmark.org.uk/about/privacy-policy.**

Publication of consultation responses

Responses will be reviewed and may be included or summarised in the consultation response document, which may be published on **trustmark.org.uk**. The published response may include a list of responding names or organisations but will not include personal contact details.

Confidentiality request

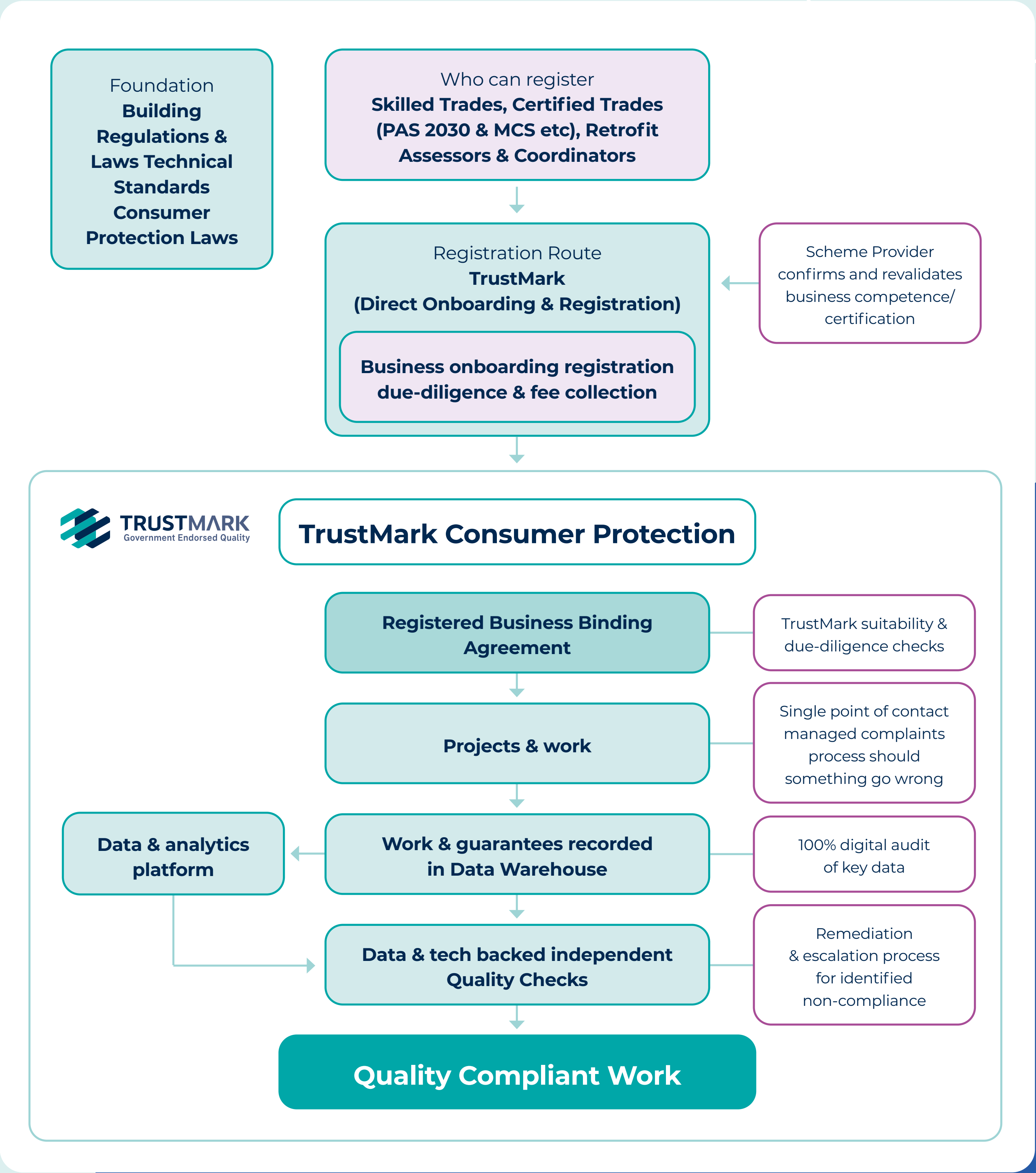
If you wish for your consultation questions responses to be treated as confidential, you must explicitly let us know via the online consultation response form. Complete confidentiality cannot be guaranteed in all circumstances. An automatic confidentiality disclaimer from your IT system will not be considered as a confidentiality request.

Sharing of data

TrustMark may choose to share data with organisations we consider appropriate such as the Department for Energy Security and Net Zero and the Department for Business, Innovation, Science and Trade to support the decision-making process regarding the Scheme changes.

It is important to carefully consider the implications of providing information in response to the consultation, particularly regarding confidentiality and data protection.

Scheme High Level Overview Diagram (where work recorded):



7. Direct Relationship Model

Under the proposed new model, TrustMark registered businesses and registered individuals will have a direct, clear relationship with TrustMark, giving both registrants and consumers' confidence in what registration means and what it delivers. The relationship will be governed by a binding agreement, incorporating rules, terms and conditions. The agreement will require registered businesses and individuals to maintain responsibility for all the work they carry out, including that of any employees and sub-contractors.

Under the new model, TrustMark will manage application and on-going business suitability and due-diligence checks, such as verification of trading address, financial checks, company history, and County Court Judgments using established data methodologies where appropriate and will collect registration fees directly from each registered business and individual. Scheme Providers' role will be streamlined to confirming and validating competence and certification (such as PAS 2030 and MCS certification) for businesses referred to them by TrustMark. Any personal data will be handled in line with UK data protection legislation.

Consolidating these functions within TrustMark also reduces the duplication of administrative effort that can arise where application, registration and fee administration are handled separately by each Scheme Provider, addressing a source of the fragmentation that has been identified as a risk to consistent oversight and consumer protection.

This proposed change gives TrustMark greater visibility, consistency and accountability across the entire registration base. It is intended to support consumers with an improved, clear and more easily accessible managed complaints process, should something go wrong.

TrustMark is also proposing to introduce a continuing obligations provision in its binding agreement with registered businesses and individuals. This would make clear that certain obligations including guarantee duties, remediation obligations and data retention requirements remain in force even after a business's registration ends.

TrustMark recognises that the direction of travel set out by DESNZ in its consultation on Reforming Consumer Protection for Home Upgrade Schemes points toward a future in which accountability extends beyond the business to the individual installer carrying out work in a consumer's home. DESNZ has signalled its intention to explore, with the Ministry of Housing, Communities and Local Government (MHCLG) and the Building Safety Regulator, how individual installers within businesses can be made more accountable, with greater direct oversight from self-certification schemes. TrustMark very strongly supports this ambition.

The proposals set out in this consultation are designed with that future state in mind. Establishing a direct relationship with every registered business and individual is an essential first step: it creates the infrastructure of accountability via the binding agreements, the data flows, and the governance arrangements, upon which individual-level oversight can be built. TrustMark's Data Warehouse, and the extended lodgement requirements detailed later in this document, will mean that completed work is systematically attributed to the registered business or individual responsible for it. As the scheme develops, and as the wider policy and regulatory framework matures, this attribution can be extended to the level of the individual operative, enabling performance to be tracked, any patterns of non-compliance to be identified earlier, and accountability to be more granular.

TrustMark is committed to working with DESNZ, MHCLG and the Building Safety Regulator, to ensure that the redeveloped TrustMark scheme is ready to support individual installer accountability when government concludes that the time is right to take that step. The architecture we are building now is designed to make that transition straightforward, not to require a further redesign. We see this as a natural and necessary evolution of the scheme, and one that will further strengthen the consumer protections that are at the heart of these proposals.

Consultation Questions:

Do you support the proposal for TrustMark to hold a direct relationship with registered businesses and registered individuals governed by a binding agreement?

Do you agree with the proposal that Scheme Providers' role in the TrustMark scheme be streamlined to confirming and validating competence/certification?

Do you support TrustMark carrying out business suitability and due-diligence checks, including individual-level checks (such as identity verification and a personal credit check)?

Do you agree that obligations such as guarantees, remediation and data retention duties should remain enforceable after a business's registration ends?

Do you have any views regarding the options for enforcing continuing liabilities, for example personal liability?

8. Competence Framework

TrustMark will continue working with the existing infrastructure for establishing, proving and maintaining competence. Businesses and individuals will apply for and be registered with the TrustMark scheme directly by TrustMark, which will include the condition that competence/certification is confirmed by the relevant TrustMark Scheme Provider before registration is completed.

Therefore, we will continue to recognise competence through certification including PAS 2030 and MCS certification as applicable, and the schemes that validate Retrofit Assessors and Retrofit Coordinators.

For skilled trades/roles, and contexts including those that do not require formal competence routes, certification or registration, but still have obligations to meet all legal, safety, and quality requirements, we will continue to accept confirmation of competence through relevant TrustMark approved Scheme Providers. In some cases technical competence will be a determination that a business can, as a minimum, meet the requirements of Building Regulations and other relevant legal requirements. This reflects the wider requirement under the Building Safety Act 2022 for those carrying out building work to be competent to do so.[9]

Where the scope of a registered business's or individual's competence and/or certification changes during the registration period, the Scheme Provider's update will be used to amend the registered trades as appropriate.

Governance arrangements will be created to manage the accuracy, timeliness and methodology for the transfer of initial and on-going competence and certification data between the parties.

It is not TrustMark's intention to duplicate the competence activities of Scheme Providers. However, the TrustMark quality assurance framework is designed to monitor the application of competence and the delivery of consumer outcomes under the TrustMark scheme.

Consultation Question:

Do you support TrustMark's proposed approach to competence and certification validation?

[9] Building Safety Act 2022: https://www.legislation.gov.uk/ukpga/2022/30/contents

9. Extended Data Warehouse Lodgement

TrustMark will extend the requirements of lodgement to drive improved consumer protection. By broadening the scope of lodgement and including more types of home improvement work, and also aligning with other regulated areas, such as self-certifiable work under Competent Persons Schemes, more work will be included under our quality assurance framework. This will drive quality, consumer protection and the provision of data and insights to parties such as government departments, regulators, industry bodies and local authorities.

Where the policy rules of government funded schemes mandate lodgement, then the rules for those schemes must be complied with, for example those that require a PAS 2035[10] (the overarching retrofit standard) compliant approach.

Sub-contractor accountability is one of the most significant gaps in the current system. TrustMark will require that parties responsible for carrying out work are identified within the lodgement and work-recording process.

TrustMark is considering classifying work types into risk classifications. The risk classification can determine the lodgement/work recording obligations which will include evidence requirements, timescales and the fees that apply. The lodgement fee structure would be intended to cover the cost of the quality assurance activities associated with the risk classification of the work.

Consultation Questions:

What types of work risk categories should be considered and what types of work should fall into those categories?

Do you support TrustMark's proposed approach to extending the requirements for lodgement?

Do you support a risk-based pricing model to cover the cost of quality assurance activities based on work risk?

[10] https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-2035-retrofitting-dwellings-for-improved-energy-efficiency/

10. Quality Assurance

Quality assurance is a fundamental priority for TrustMark and sits at the heart of TrustMark's proposed new model.

A key objective for TrustMark is the independent monitoring of quality and consumer outcomes for work delivered under the scheme where lodgement requirements apply. It can be applied regardless of property tenure or work funding methods. TrustMark operates a mature, risk-based quality assurance framework that draws on job-level data lodged in the Data Warehouse, AI-enabled analytics, and targeted on-site audit activity. It is this framework, not the scheme registration process alone, that provides the assurance that work delivered under TrustMark is compliant and of suitable technical standard.

TrustMark's AI-enabled data analytics platform combines predictive risk modelling, anomaly detection, and intelligent document analysis to identify businesses and jobs that warrant closer scrutiny. This approach was directly responsible for identifying the systematic solid wall insulation delivery failures in ECO4 and GBIS before they were visible through conventional monitoring methods. It demonstrates that intelligence-led, data-driven quality assurance is significantly more effective than retrospective, sampling-based audit.

How TrustMark's quality assurance works

Under the proposed new model, TrustMark's quality assurance activities are structured around three tiers:

- **Data-led risk scoring:** Every job lodged in the Data Warehouse is assigned a risk score based on a range of indicators including installer volume, geographic clustering of work, documentation quality, complaint and dispute patterns, and company history. Higher risk jobs are automatically flagged for further review.
- **Digital audit:** Digital audits may be completed, including AI-assisted analysis of installation photographs and supporting documentation. Any aspects that fail the digital audit will be subject to a structured review with human intervention. This allows TrustMark to identify potential non-compliance before committing to the cost and disruption of an on-site visit.
- **Targeted on-site audit:** Where a digital review indicates a higher probability of non-compliance, TrustMark will carry out an independent on-site audit. Audit findings feed back into the risk model, improving the targeting of future activity. Where non-compliance is confirmed, the Accountability Framework (Section 13) sets out the range of responses available. Targeted on-site audit can still be complemented with random audits.

Data sharing and government oversight

TrustMark's Data Warehouse operates as a government-accessible platform. Data on installation activity, audit findings, and installer performance is available to relevant public bodies and certification bodies for consumer protection purposes.

Extended lodgement requirements (see Section 9) can significantly increase the volume and breadth of data available for quality assurance purposes. This will enable TrustMark to provide richer, more comprehensive insights to government and regulators on installation quality, market trends, and emerging risks. This is also valuable data for Scheme Providers committed to improving standards in their sector.

Consultation Question:

Do you support TrustMark's proposed approach to risk-based quality assurance, including the use of data analytics and targeted audit?

11. A Managed Consumer Complaints Process

Under the proposed new model, TrustMark will become the primary point of contact for consumers escalating complaints or pursuing dispute resolution regarding work completed under the TrustMark scheme.

The outcome will be to remove the fragmented journey that consumers experience when having to deal with multiple parties and better support the needs of vulnerable consumers. It also ensures faster resolution for installers themselves.

This is a significant change from the current model, where complaints are largely managed through Scheme Providers.

TrustMark will provide dedicated case management with a single point of contact who will acknowledge and triage complaints. This will include keeping the complainant informed at each stage, adapting timescales and communication where needed (e.g., when dealing with vulnerable individuals), and driving cases through to a fair, proportionate resolution.

There will also be an independent route to escalate, if required. TrustMark registered businesses and individuals must be accountable for the quality of their work, and we will work with them to find a suitable resolution where a valid complaint exists. TrustMark is also strengthening its remediation framework and considering including the right to appoint a third party to remediate at the business's cost, if it fails to act properly.

Independent oversight and final referral

TrustMark will ensure that its complaints and dispute resolution process is not only effective but independently accountable. While TrustMark will act as the primary case manager for escalated consumer complaints related to work carried out under the scheme, consumers who remain dissatisfied after TrustMark's process has been completed will have access to an independent Dispute Resolution Ombudsman. TrustMark currently operates arrangements with a Chartered Trading Standards Institute approved Alternative Dispute Resolution (ADR) provider and intends to maintain and develop this as part of the new model.

This independent escalation route is an essential safeguard. It ensures that TrustMark cannot be the final arbiter of its own decisions and provides consumers with confidence that they have a meaningful route to independent review.

TrustMark will publish clear, consumer-facing information about the independent escalation route at every stage of the complaints process so that consumers and registered businesses/individuals are aware of their rights.

Supporting vulnerable consumers

TrustMark recognises that many of the consumers that benefit from government-backed home upgrade schemes include those on low incomes, older people, and those with disabilities or long-term health conditions. These groups can also be among those least able to navigate complex complaints processes or pursue redress when things go wrong. Accessibility and vulnerability are therefore central design principles for TrustMark's managed complaints process.

TrustMark is proposing the following commitments in relation to vulnerable consumers:

- **Accessible complaints channels:** Given that an estimated 10 million adults are not able to access or benefit from digital services[11], complaints will be accepted by telephone, online, and in writing. TrustMark will provide additional support including assisted digital access, large-print communications, and translation support where needed.
- **Vulnerability identification:** TrustMark's case management process will include a structured step to identify whether a consumer may be vulnerable, inviting them to identify any additional needs or circumstances that may affect how their case is handled. This will be informed by existing guidance such as that published by the Financial Conduct Authority (FCA) and Ofgem on the fair treatment of vulnerable customers. Where vulnerability is identified, cases will be assigned to a named case handler and managed with appropriate adjustments to timescales, communication methods, and support offered.
- **Proactive contact:** Where TrustMark's quality assurance activity identifies a potential problem with work at a property, TrustMark will proactively contact the consumer rather than waiting for a complaint to be raised. This is particularly important where the consumer may not be aware that a problem exists or may not feel confident enough to complain independently. This will be handled sensitively to avoid causing alarm, in a structured way that enables issues to be solved as quickly and efficiently as possible.
- **Reasonable adjustments to timescales:** TrustMark recognises that standard complaint timescales may not always be appropriate for vulnerable consumers and will build flexibility into the process to reflect individual circumstances.

TrustMark will work with consumer advocacy organisations to test the accessibility of its complaints process before launch and to identify improvements.

Consultation Questions:

Do you support TrustMark becoming the primary consumer contact point for complaint escalation and dispute resolution for work carried out under the quality scheme?

What are the key areas a consumer complaints process should include to be genuinely accessible, including for vulnerable consumers?

Do you support TrustMark having the right to appoint a third party to carry out remediation, at the business's cost, where the business fails to act?

[11] NHS England, Inclusive digital healthcare: a framework for NHS action on digital inclusion

12. Financial Protection

Financial protection is a critical component of consumer confidence in home improvement work. Where an installer fails to remedy a problem or is no longer trading, consumers need to know that there is a financial safety net in place.

TrustMark is committed to strengthening financial protection requirements for work carried out under the scheme and will work to align its approach with the National Home Improvement Council (NHIC) Financial Protection Working Group's recommendations[12], which TrustMark supported through active participation in the working group. Under the proposed direct relationship model, financial protection obligations will be set out in the binding agreement between TrustMark and each registered business and individual.

Alignment with the NHIC framework

TrustMark supports the government's intention to implement the NHIC recommendations across all government-supported home upgrade work. In particular, TrustMark supports the principle that consumers should not need to exhaust all other redress routes before making a guarantee claim, and that guarantee products should be structured to deliver accessible, timely financial protection rather than create additional barriers to redress.

Solidarity fund

TrustMark will pursue a last-resort solidarity fund for cases where all other remediation routes have been exhausted. Any such fund must be financed by a levy on scheme participants rather than by government directly, so that accountability remains with the market. TrustMark will engage with government on the design and governance of such a fund, given its existing role in financial protection verification and its established relationships with guarantee providers.

Consultation Question:

Do you support TrustMark's proposed approach to financial protection requirements under the scheme?

[12] https://nhic.org.uk/protect-what-matters/

13. Accountability Framework

The vast majority of TrustMark registered businesses and individuals deliver high-quality work and maintain the standards consumers expect.

Where registered businesses and individuals, employees or sub-contractors fall short, TrustMark will have clearer, more direct powers to act, protecting consumers and the reputation of the many businesses that do things right. These powers will include the application of sanctions where justifiable and using robust and proportionally graduated approaches where non-compliance is identified by TrustMark.

TrustMark is proposing the following commitments in relation to sanctions:

- **Consistency:** Similar breaches will receive the same baseline response for all members. This will help to avoid subjective decisions, while still allowing breaches to be reviewed on merit with the aim of avoiding unintended consequences.
- **Clarity:** The publication of sanction categories and triggers (e.g., competence failure, insurance lapse, repeated non-compliance). Pathways to have any relevant sanctions lifted and processes and appeal routes need to be transparent.
- **Proportionality and proposed graduation:** Sanctions will operate on a graduated basis, beginning with warnings and mandatory corrective action for first or low-severity instances of non-compliance, escalating to financial penalties (for example charges for reinspection or remediation monitoring) and temporary suspension where issues persist or recur. Termination of registration would be reserved for persistent, serious, or safety-critical failures where continued registration would put consumers at risk.

TrustMark is committed to ensuring that any action it takes against a business is transparent, proportionate and fair. There will be a clear process for escalating concerns and businesses will have the right to appeal a decision.

Consultation Questions:

Do you support that TrustMark should have direct sanctioning powers?

Do you agree with the proposal for the implementation of graduated sanctions?

14. Registration Fees

TrustMark is committed to ensuring that fees are transparent, predictable and proportionate to the benefits of registration.

TrustMark is currently considering two options for a fee structure.

One option is to maintain a flat fee structure, similar to the current structure where fees are charged per business registration, regardless of size.

A second option would be to introduce a business size-based tiered registration fee. Annual fees could be set across four bands aligned to standard UK government definitions:

- Micro (1–9 employees),
- Small (10–49 employees)
- Medium (50–249 employees)
- Large (250 or more employees).

This approach would ensure that fees are proportionate to the size and capacity of each business.

Other options may be considered.

Lodgement fees (see Section 9) are separate to registration fees.

Consultation Question:

Do you support moving to a business sized-based pricing model?

15. Transition

TrustMark recognises that the proposed changes, including the move to a direct relationship model, represent a significant change for Scheme Providers and those registered with the scheme. A clear, managed transition is essential to maintain continuity of service for consumers and to give schemes and registrants sufficient time to prepare.

TrustMark is committed to supporting and communicating clearly with the parties throughout the process.

We recognise that new governance requirements and guidance documents will be required for those Scheme Providers, registered businesses and individuals who choose to transition.

Consultation Questions:

What support and transition period do you think that Scheme Providers will need to change to a scheme where TrustMark has a direct relationship with registered businesses and individuals?

What support and transition period do you think that registered businesses and individuals will need to change to a scheme where TrustMark has a direct relationship with them?

Are there any other comments you would like to make regarding the TrustMark proposed scheme changes?

16. What Happens Next

TrustMark is committed to exploring all options to achieve the direction of change set out in this document. This consultation is designed to gather relevant feedback and shape our next steps as we move forward with our transformation.

Once the consultation closes, TrustMark will review all responses and publish a summary of the findings. All feedback received will be considered.

We will communicate key decisions and next steps as the programme develops, ahead of a planned launch in spring/summer 2027.

17. Annex One – Consultation Questions

1. Do you support the proposal for TrustMark to hold a direct relationship with registered businesses and registered individuals governed by a binding agreement?
2. Do you agree with the proposal that Scheme Providers' role in the TrustMark scheme be streamlined to confirming and validating competence/certification?
3. Do you support TrustMark carrying out business suitability and due-diligence checks, including individual-level checks (such as identity verification and a personal credit check)?
4. Do you agree that obligations such as guarantees, remediation and data retention duties should remain enforceable after a business's registration ends?
5. Do you have any views regarding the options for enforcing continuing liabilities, for example personal liability?
6. Do you support TrustMark's proposed approach to competence and certification validation?
7. What types of work risk categories should be considered and what types of work should fall into those categories?
8. Do you support TrustMark's proposed approach to extending the requirements for lodgement?
9. Do you support a risk-based pricing model to cover the cost of quality assurance activities based on work risk?
10. Do you support TrustMark's proposed approach to risk-based quality assurance, including the use of data analytics and targeted audit?
11. Do you support TrustMark becoming the primary consumer contact point for complaint escalation and dispute resolution for work carried out under the quality scheme?
12. What are the key areas a consumer complaints process should include to be genuinely accessible, including for vulnerable consumers?
13. Do you support TrustMark having the right to appoint a third party to carry out remediation, at the business's cost, where the business fails to act?
14. Do you support TrustMark's proposed approach to financial protection requirements under the scheme?
15. Do you support that TrustMark should have direct sanctioning powers?
16. Do you agree with the proposal for the implementation of graduated sanctions?
17. Do you support moving to a business size-based pricing model?
18. What support and transition period do you think that Scheme Providers will need to change to a scheme where TrustMark has a direct relationship with registered businesses and individuals?
19. What support and transition period do you think that registered businesses and individuals will need to change to a scheme where TrustMark has a direct relationship with them?
20. Are there any other comments you would like to make regarding the TrustMark proposed scheme changes?

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