



TRUSTMARK
Government Endorsed Quality

V1.0

The TrustMark Consultation for:

TrustMark Licence Plus for The
Great British Insulation Scheme

and for

TrustMark Strengthening of
Financial Protection.





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01

Consultation Details

- Publication date:** 14th November 2024
Responses by: 23:59 on 12th December 2024
Enquiries to: licenceplus@trustmark.org.uk

Please do not submit consultation responses to this email address. Any responses submitted via this email address will not be considered.

- Consultation reference:** TMLP for GBIS & for Strengthening of Financial Protection
Audiences: Stakeholders with an interest in domestic energy efficiency, heating and financial protection.
Territorial extent: United Kingdom.

02

How to Respond

Please respond via the online form available at <https://www.trustmark.org.uk/pages/licence-plus-consultation>

Other methods of response may not be considered.

Responses submitted after the consultation closure of **23:59 on 12th December 2024** will not be considered.



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Confidentiality and Data Protection

Disclosure in accordance with UK legislation: Information provided, including personal data, may be disclosed as required by UK laws such as the Data Protection Act 2018.

Confidentiality request: If you wish for your consultation questions responses to be treated as confidential, you must explicitly state so. However, it's noted that complete confidentiality cannot be guaranteed in all circumstances. An automatic confidentiality disclaimer from your IT system will not be considered as a confidentiality request.

Processing of personal data: Your personal data will be handled in accordance with applicable data protection legislation and our privacy notice¹.

Publication of consultation responses: Responses will be reviewed and may be included/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 organizations but will not include personal contact details.

Sharing of data: Data may be shared with the Department for Energy Security and Net Zero to support the decision-making process regarding the inclusion of the TrustMark Licence Plus for the Great British Insulation Scheme and for the alignment/strengthening of financial protection.

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

¹ <https://www.trustmark.org.uk/about/privacy-policy>



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Background and Introduction

The Department for Energy Security and Net Zero is considering introducing an 'alternative standard' to PAS 2035/PAS 2030² to support a compliance cost proportionate delivery of loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation), within the Great British Insulation Scheme (GBIS). The 'alternative standard' the Department is considering introducing is a version of the TrustMark Licence Plus (TMLP), originally launched in the Autumn of 2022, with further developed principles for GBIS via an industry working group.

Please note that whilst this consultation includes the proposed design of TMLP for GBIS, the question as to whether the 'alternative standard' should be utilised for GBIS is a matter for the Department for Energy Security and Net Zero and any comments on that point should be submitted in response to the Department's consultation, which can be found here:

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

TMLP for GBIS can support a proportionate compliance delivery approach for the installation of loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation) within the scope of TMLP for GBIS. The TMLP for GBIS proposal incorporates elements of both PAS 2035 and PAS 2030 in order that proportionate risk management can be achieved for the delivery of loft insulation, when delivered as a single measure, and heating controls (when paired with loft insulation) under GBIS where a departure from PAS 2035 and PAS 2030 is appropriate.

The document also outlines proposals for specific financial protection requirements to supplement the proposed streamlined requirements.

TrustMark has worked closely with the Department for Energy Security and Net Zero and the TMLP for GBIS is proposed after consultation and feedback from a working group facilitated by the Department composed of representatives from the energy efficiency retrofit sector.

It is proposed that TrustMark Scheme Providers will have a role in TMLP for GBIS, with a requirement to assess installing businesses and the installation of loft insulation and heating controls, with responsibility for the conduct of their members and to resolve disputes, subject to TrustMark oversight and audit. The TMLP for GBIS assurance requirements will be in the public domain via TrustMark and available for any TrustMark Scheme Provider to access where they wish to be considered for TMLP for GBIS as part of their licence agreement with TrustMark.

TrustMark monitoring of lodgement data and onsite inspection will remain a key element of monitoring of Registered Business outputs.

TrustMark is also seeking views on the wider ambition of strengthening financial protection for the use under government grant funded and capital schemes and ECO. This also takes into account the Government response to the ECO4 consultation.

² <https://knowledge.bsigroup.com/products/retrofitting-dwellings-for-improved-energy-efficiency-specification-and-guidance-2?version=standard>



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

The TMLP for GBIS builds on the existing TrustMark requirements as set out in the Framework Operating Requirements, Code of Conduct and Customer Charter documents available from the TrustMark website³:

TrustMark Scheme Providers and Registered Businesses who participate will continue to need to comply with the respective requirements set out in these documents as well as any requirements established for the delivery of TMLP for GBIS after taking into due consideration the outcome of this consultation.

Please see Annex A: TMLP for GBIS Proposed Construct - Overview Diagram

06

Retrofit Assessment

Every property will be required to be the subject of a PAS 2035 compliant Retrofit Assessment, including a ventilation assessment and the production of an Energy Performance Report carried out by a TrustMark registered Retrofit Assessor professional, qualified in accordance with PAS 2035 principles as a minimum.

The Retrofit Assessment will also verify that the property to be improved under TMLP for GBIS is within the scope of TMLP for GBIS, thus eligible to be installed under TMLP for GBIS, rather than under the PAS 2035 process.

If the property falls outside the scope of the scheme, then the PAS 2035 process will apply where a requirement for a PAS 2035 delivery exists. Properties to be regarded as out of scope of TMLP for GBIS include, but are not necessarily limited to:

- High-rise buildings
- Heritage properties
- Properties where a non-typical design would apply
- Properties where non-typical access applies
- Properties where existing mould, condensation and/or damp issues are identified.

³ <https://www.trustmark.org.uk/business/documents>



07

Location Specific Installation Design

Within the TMLP for GBIS an installation design for the property to be improved will be required. The design may be completed by the installer, the product supplier or a third party and it must be clear who is responsible.

To help ensure a level of independence is introduced it is proposed that where an installer completes the installation design the persons involved must be different from those undertaking the installation itself. In any situation the designer must be appropriately competent and working to scheme rules and relevant regulations and standards.

The design shall be consistent with the Retrofit Assessment findings and where further information is required it shall be sought by the designer. The design shall include any ventilation upgrades required and construction details for managing thermal bridging taking into account any requirements stipulated in the technical approval or product supplier specifications and reflect measure specific industry best practice guidance, where available.

All products and/or systems selected for installation shall hold a suitable technical approval for the specific application and the building construction, be consistent with the findings of the Retrofit Assessment with regards to building and site characteristics, and any constraints.

The design shall ensure that the products and systems specified are compatible with the building and with each other and with existing measures installed. The design shall also be consistent with any relevant product/system supplier's installation instructions and with the technical approval for the product.

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Pre-Installation Building Inspection, Post Completion Evidence, and Independent Monitoring

In order that robust mechanisms are incorporated into TMLP for GBIS we are working to include the PAS 2030 principle of Pre-Installation Building Inspections (PIBI), and independent monitoring of PIBIs as mechanisms to help ensure that the property proposed to be improved is suitable for the measure/s and the work to be undertaken is feasible under TMLP for GBIS.

Furthermore, we are working to create a consistent mechanism of oversight by the introduction of TrustMark registration and monitoring of those approved to deliver the independent monitoring function.

Likewise, the collation of defined post completion evidence is proposed to be submitted and monitored for compliance. Should non-compliance with the recognised technical standards be identified remedial activities will be required so that installation defects can be addressed immediately before lodgement with TrustMark.



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Installation, Post Installation Checks and Testing

Work must be carried out by an appropriately registered and competent TrustMark installing business.

Prior to commencing installation, the installer will validate the design for each measure to be installed and installation shall not proceed until the installer is satisfied that the design is complete and suitable.

Prior to commencement of any installation work the installer shall, define and record in a method statement the complete installation process to be followed for each measure to be installed.

The installation, post installation checks/tests and handover of loft insulation, associated ventilation and heating controls will be required to be carried out in compliance with the respective regulations, standards and measure specific industry best practice guidance, where available.

Upon completion of the work a post completion Energy Performance Report is required to be created by the Retrofit Assessor.

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Competence

All persons within the delivery of TMLP for GBIS will be competent for the task they perform i.e. possessing the necessary technical knowledge, skill and experience relevant to the task to be undertaken.

For installer competence we plan to allow a provision to permit PAS 2030 certification, or evidence that an installer is working towards PAS 2030 certification, to be taken into account as part of the initial audit by any Scheme Provider validating compliance with the TMLP for GBIS assurance requirements.

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Lodgement

Lodgement to TrustMark will be a requirement via the TrustMark registered installing business and will be modelled on existing processes and within the TrustMark Framework Operating Requirements or associated policy type document(s). The cost of TMLP for GBIS installer lodgement is anticipated to be £45 plus VAT, as based on current lodgement fees.



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Assurance Activities

TrustMark risk-based assurance activities will apply to lodgements and installations carried out under TMLP for GBIS utilizing the existing delivery methodology.

To ensure that installers apply the TMLP for GBIS PIBI requirement consistently and robustly, new TrustMark requirements for independent assessment PIBIs are planned to be introduced using the PAS 2030 principles. Independent assessment providers would evaluate evidence, check property suitability, and appropriateness to proceed along the TMLP for GBIS route. TrustMark has commenced engagement with potentially suitable independent organisations.

Independent assessment providers would be subject to TrustMark approval and ongoing audit. We are considering whether there is scope to integrate independent assessment data pre and post installation within lodgement to TrustMark.

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TrustMark Registration

There are expected to be initial and on-going costs for eligible organisations wanting to sign up with TrustMark Scheme Providers offering TMLP for GBIS, and this will be set by the relevant Scheme Provider.

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Financial Protection for TMLP for GBIS and Beyond

Financial protection is an important component of TMLP for GBIS that complements the assurance requirements outlined earlier in this consultation to ensure that consumers have robust and effective protection on works completed and services provided in their homes.

TrustMark has worked closely with the Department for Energy Security and Net Zero on the proposed changes to financial protection for TMLP for GBIS after feedback from a working group facilitated by the Department composed of representatives from the retrofit sector.

The proposed requirements for financial protection within TMLP for GBIS are to ensure coverage for assessment and design, rectification of failed measures and consequential damage arising directly from the failed measure, product warranty and workmanship guarantee, 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 (when paired with loft insulation).



TrustMark will mandate the financial protection mechanism requirements for measures via TrustMark's Framework Operating Requirements or associated policy documents for TMLP for GBIS.

This consultation also provides an opportunity for TrustMark to propose strengthening the financial protection regime beyond TMLP for GBIS, helping to drive up standards and protections in the sector. This is consistent with government's intention to strengthen requirements outlined in the response to the consultation on the design of ECO4⁴ and the findings of the Competition and Markets Authority following their call for information on consumer protection in the green heating and insulation sector⁵.

The Government outlined in their response to the consultation on the design of ECO4 their intention to increase the duration of guarantees for gas boilers and loft insulation. It is proposed that guarantees for those measures be increased to six-years.

Furthermore, TrustMark is keen to ensure alignment of strengthened financial protection requirements irrespective of the scheme or initiative that works are delivered under. This will help to ensure consistency and reduce the opportunity for error associated with having different requirements for different funded schemes. Where there is a difference in requirements currently TrustMark is proposing that the higher of the two will be adopted. For example, six-years for gas boilers and loft insulation delivered under other funded schemes, including ECO.

To achieve the wider ambitions of strengthening financial protection for use in the government grant funded and capital schemes and ECO, and also to ensure consistency across different government schemes, we are taking the opportunity to use this consultation to propose the use of the TrustMark facilitated independent Financial Protection Panel in approving and mandating all financial protection operating within these schemes. This will open the scope to more than the current 25-year policies.

To help ensure that robust financial protection mechanisms are available from the outset to augment the proposed streamlined installation requirements we have engaged and will continue to engage with existing financial protection providers who currently support these measures to ascertain that there can be appropriate protection available.

⁴ <https://assets.publishing.service.gov.uk/media/6246c8c4d3bf7f32b65d72ca/eco4-government-response.pdf>

⁵ [Consumer protection in green heating and insulation sector - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/consumer-protection-in-green-heating-and-insulation-sector)



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Consultation Questions for the Construct of TMLP for GBIS

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"> • High-rise buildings • Heritage properties • Properties where a non-typical design would apply • Properties where non-typical access applies • Properties where existing mould, condensation and/or damp issues are identified <p>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If no, please explain</p>
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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If no, please explain</p>
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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If no, please explain</p>
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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If no, please explain</p>
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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If yes, please explain</p>



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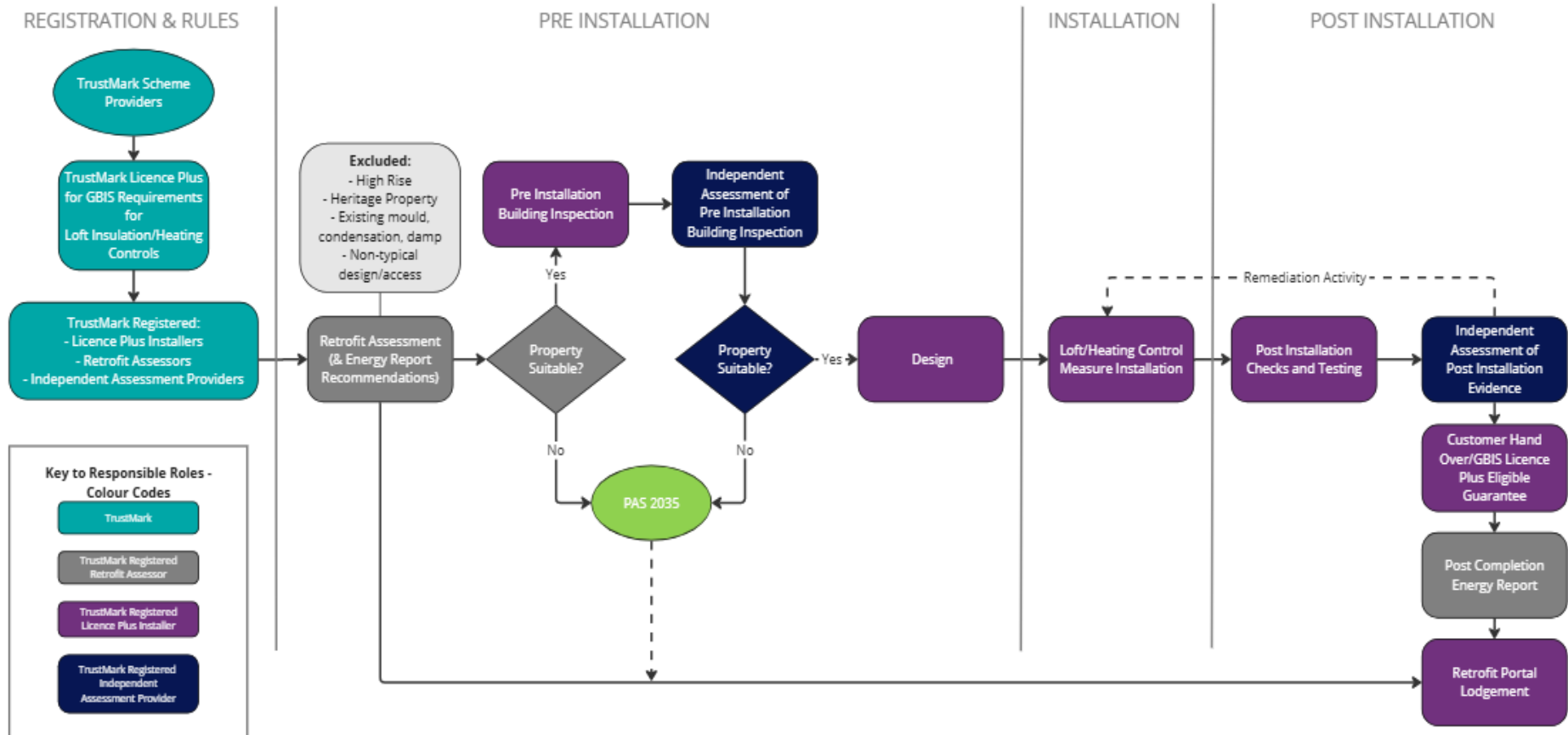
Consultation Questions about Financial Protection

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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If no, please explain</p>
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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If yes, please explain</p>
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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If no, please explain</p>
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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If no, please explain</p>
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>Response options:</p> <ul style="list-style-type: none"> • Yes • No • Don't know or prefer not to say <p>If yes, please explain</p>



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Annex A: TMLP for GBIS Proposed Construct - Overview Diagram





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



TRUSTMARK
Government Endorsed Quality