Citizens Advice response: Conditions of authorisation review

Citizens Advice
June 2026

About us

We can all face problems that seem complicated or intimidating. At Citizens Advice we believe no one should have to face these problems without good quality, independent advice. We give people the knowledge and the confidence they need to find their way forward - whoever they are, and whatever their problem.

We offer local advice from around 1,650 locations across England, Wales and the Channel Islands. Our service is delivered by around 19,500 volunteers and 10,000 colleagues across the whole Citizens Advice service.

Through our advocacy work we aim to improve the policies and practices that affect people's lives. No one else sees so many people with so many different kinds of problems, and that gives us a unique insight into the challenges people are facing today.

For this consultation, we have responded to topic areas where relevant to our remit and expertise, and have indicated the key relevant consultation questions.

Visibility of schemes

Question 3: Do you consider there is sufficient visibility of Scheme operators and their roles? - No

No, we do not consider that there is sufficient consumer visibility of scheme operators and their roles. Citizens Advice's research on consumers' experiences of the wider protection landscape within the green home upgrades market has found that the number of different schemes can leave consumers unsure of what protection they have and what standards work should be carried out to.[1] Consumers who need support with faulty installations are frequently unsure where to turn, and can be passed between bodies when trying to find a resolution. Our Citizens Advice advisers also see issues where consumers haven't been given full or correct paperwork, meaning they may not be aware which scheme their installer is operating under.

[1] Citizens Advice (2023), Home Safe: Giving consumers confidence to install low carbon technologies

Governance of Competent Persons Schemes

Question 5: What approaches to governance, if any, (e.g., independent oversight) could strengthen consistency across schemes?
Question 6: How effective are current conflict of interest safeguards and how could they be strengthened?

It is vital to strengthen **consistency across the consumer protection landscape** for green home upgrades, so that standards are upheld across installers and consumers have clear routes to pursue redress if things go wrong. A system in which schemes are funded by and compete for installer membership risks enabling poor practice, meaning there must be clear minimum standards across schemes.

Citizens Advice has proposed that DESNZ should deliver an end-to-end consumer protections framework for the green home upgrades market, with oversight over all elements of the system and short chains of accountability. We have argued that this should include a **single quality scheme**, with **clear routes to redress** where needed - backed up by access to **independent advice** for consumers. We have welcomed DESNZ's consultation into reforming consumer protection for home upgrade schemes, which sets out its intention to establish a centralised end-to-end consumer protections service.

A single quality scheme should **select and integrate existing certification functions**, based on robust and consistent standards. We note that DESNZ's consultation sets out its intention of "working closely with MHCLG and BSR to ensure alignment between the consumer protection reform plans and the oversight of self-certification schemes", with self-certification schemes operating as "part of a simplified and more coherent assurance landscape".[2] This should include exploring whether self-certification functions, including Competent Persons Schemes, can be brought into a single framework alongside certification bodies. At minimum, it will be essential to ensure alignment and consistency across the assurance landscape. There should be uniformly high standards across different certification and self-certification functions, so that consumers receive consistently high-quality installations regardless of how their

[2] Department for Energy Security and Net Zero (2026), Reforming Consumer Protections for Home Upgrade Schemes: Consultation

installer is certified. Our report Stepping Up has further detail on how a future consumer protection framework could operate.

Sanctions for rule-breaking

Question 9: Do you agree that Schemes should implement consistent, clear, proportionate, transparent sanctions for scheme members who breach rules? - Yes
Question 10: Do you agree that clear, proportionate and transparent sanctions should be developed for Scheme Operators who breach the Conditions of Authorisation? - Yes
Question 11: What range of sanctions (e.g., soft, medium, hard) should be considered for Scheme members and operators?

Any meaningful consumer protections framework must include clear and consistent sanctions for members who break rules. This is vital to ensure that installers are incentivised to comply and to prevent rogue actors from continuing to operate in the market.

Different sanctions will be appropriate for different circumstances. This could range from support for members to boost standards and comply, with options for further enforcement action for more serious breaches. Ultimately, schemes should remove membership from installers who have consistent or serious instances of non-compliances. It is important that in these cases, installers are not able to continue operating in the same way by moving to another scheme. This could be ensured by having a streamlined and consistent system of self-certification which is aligned with a reformed consumer protection framework, with data sharing between different parts of the system. In all cases, enforcement should be focused on ensuring that any issues are remediated for consumers.

It is also important that schemes themselves fulfil their obligations, to ensure that installers are held to the same high standards regardless of their certification route. In line with a reformed consumer protections framework, scheme operators should have consistent standards for installers and should themselves have to adhere to clear and consistent frameworks around levels of audit, data monitoring and participation in redress processes. Data sharing across the system will be important to measure outcomes across scheme operators and ensure that appropriate levels of consumer protection are being provided. Where a scheme operator consistently falls short, it should lose its authorisation to operate as part of the consumer protection framework.

Financial protection models

Question 15: How well do current financial protection models (e.g., guarantees) safeguard customers, and where might they fall short?
Question 18: Should a single minimum standard of financial protection be adopted across all schemes?

Financial protection products such as guarantees and insurance can play a role in providing a backstop for consumers to receive redress where their original installer is unable or unwilling to remediate.

Insurance Backed Guarantees (IBGs) are currently the most common form of financial protection in the home improvement sector,[3] but there is currently significant diversity in the IBG market. Citizens Advice research has indicated that many products do not currently provide adequate cover, including issues such as:

- Unrealistic timescales for consumers to report issues
- Requirements to exhaust all other avenues before lodging a claim
- Payouts covering either damage to the property of the cost to replace the installation, whichever is less[4]

This can leave consumers struggling to make a successful claim in practice, despite having believed they were protected by the product. Going forward, there must be clear guidance and governance from an appropriate body to ensure products provide an appropriate level of cover and that consumers can access that cover when it's needed.

Consumers should be able to access the same minimum of financial protection regardless of how their installer is certified. All installers should be held to consistent minimum standards, which should include a single minimum standard of financial protection.

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[3] National Home Improvement Council (2025), Protecting What Matters: Financial Protection Mechanisms in Home Improvement
[4] Citizens Advice (2025), Stepping Up: Reforming protections in the retrofit market

Effective redress processes

Question 16: What should stakeholders expect from an effective redress process?
Question 17: What timeframes should schemes work to when addressing complaints and facilitating access to redress or remediation, and what sanctions should apply?
Question 21: Should all schemes be required to provide alternative dispute resolution (ADR) through an approved body?

Strong standards and auditing of installers should help to ensure that work is compliant with building regulations in the first instance. But clear and accessible redress processes are essential to support consumers where things do go wrong.

Under a reformed consumer protection framework, both certification and self-certification functions such as Competent Persons Schemes should be subject to consistent requirements which are set centrally. We note that DESNZ proposes that a new consumer protection service provider would offer a **single point of contact** to raise concerns about poor-quality work, and a single complaints process. This should also be available to consumers whose installers for green home upgrades work are certified under Competent Persons Schemes. Consumers should also be signposted to **independent advice** to support them through the process, including any escalation to ombudsman services.

This would **prevent consumers needing to self-diagnose** what the cause of any problem might be, in order to identify the relevant body to help them find a resolution. This is not a reasonable expectation for consumers, who will likely not be able to assess whether installations might be non-compliant with building regulations, for example. Access to a single quality scheme would provide consumers with a straightforward route to redress regardless of the cause of the issue.

A key principle of any redress system should be that consumers should be able to access **remediation of faulty works**, with the **original installer** bearing responsibility for putting issues right. Installers should be required to respond to customer complaints promptly and remediate where needed, and there should similarly be reasonable timeframes for a scheme to respond to and progress complaints. These timeframes should be shorter where the risk of detriment is strongest, with urgent response times where consumers have reported hazards that could pose a health and safety risk, including damp and mould.

A quality scheme should be able to provide case management and mediation for consumers. And where complaints need to be escalated, alternative dispute resolution (ADR) should be available. This should be provided in the form of a single pathway to ombudsman services, to ensure that consumers receive consistent standards of dispute resolution and have clear signposting through the process.

Data management

Question 8: Do you consider/agree that Schemes should publish annual compliance reports summarising audit outcomes and enforcement actions as well as competence data? - Yes
Question 29: Should Scheme Operators be required to publish annual compliance reports summarising member audit outcomes and enforcement actions? - Yes

Robust data management and sharing will be key to the success of a reformed consumer protection framework. Competent Persons Schemes should be required to publish transparent data on audits and enforcement outcomes, which should include both annual reports and regular data-sharing throughout the year.

Annual reports are important to allow Schemes to demonstrate their compliance with audit and enforcement requirements, and track trends over time. But immediate data-sharing is also essential to ensure that information about non-compliant installers can be shared and actioned throughout the consumer protection system. For example, if an installer fails an audit carried out by their Competent Persons Scheme, this information should be shared with any quality scheme so that the installer's accreditation can be reviewed. These kinds of mechanisms can prevent rogue installers continuing to operate by moving between schemes or "phoenixing".

Citizens Advice helps people find a way forward.

We provide free, confidential and independent advice to help people overcome their problems. We are a voice for our clients and consumers on the issues that matter to them.

We value diversity, champion equality, and challenge discrimination and harassment.

We're here for everyone.

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