Citizens Advice response: TrustMark consultation on building stronger protections for home improvement customers

Citizens Advice
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The green home upgrades market

As TrustMark's consultation notes, the Department for Energy Security & Net Zero (DESNZ) has recently concluded its own consultation into reforming the consumer protection framework for government-supported green home upgrades.

Citizens Advice welcomed the core principles of this consultation: particularly in improving centralisation and oversight of the consumer protection system, boosting standards from installers, and providing consumers with a clear redress route when issues do arise. These reforms are essential to address the current fragmentation of the consumer protection system, which has led to widespread poor practice and left many consumers unable to access meaningful redress when things go wrong. We have also argued that this framework should ultimately be made mandatory across the green home upgrades market, regardless of how work is funded.

We note that core principles of TrustMark's proposals are strongly aligned with several key Government proposals. We have supported the principles of:

- **Direct relationships with registered installers, based on binding agreements.** Citizens Advice has supported plans for installers to hold direct contractual relationships with the single consumer protection service provider, once this is established. These contracts should be robust and uniform, ensuring that a consumer protection service provider has meaningful enforcement levers where needed.
- **A graduated compliance framework.** Enforcement levers for the consumer protection service should include sanctions, suspension and termination where appropriate, based on the severity and persistence of compliance issues.
- **Obligations for installers around guarantees and remediation.** Any contractual agreements with installers should include obligations to uphold robust customer complaints processes and provide remediation where needed.
- **A simple route to redress with a single case management process and access to an ombudsman as a backstop,** ending the current system where consumers can be passed between different bodies while seeking redress. This should include establishing clear communication channels for complaints and a centralised case management system. A consumer protection service provider should be able to arrange third-party remediation where it is not possible or appropriate for the original installer to remediate. And where the consumer doesn't receive a satisfactory resolution through this process, they should have recourse to an ombudsman.

- **Robust financial protection requirements,** in line with National Home Improvement Council (NHIC) recommendations. These should include a minimum of six years' coverage; coverage of the full original contract value, with a buffer for consequential damage; and mandatory deposit protection.

As we argued in our response to DESNZ's consultation, the future consumer protection service should be overseen by DESNZ and its delivery model should be as streamlined as possible. The DESNZ-run Warm Homes Agency should oversee delivery of core functions inhouse: including providing high-level information hosted on gov.uk, managing an installer register, establishing an inhouse certification function, and delivering a redress system with a single case management process and recourse to strong contractual enforcement levers. This centralisation and streamlining is essential in order to achieve a genuinely reformed consumer protection system, and avoid preserving or further entrenching the current complexity.

Delivering this service will require DESNZ to select and streamline existing consumer protection bodies. This should be based on a clear and careful process to determine the role that existing bodies should play in delivering different functions. It is important that DESNZ undertakes this process centrally, informed by relevant evidence and expertise. This will ensure that it retains oversight of the reformed system and can deliver a genuinely streamlined consumer protection service with clear roles and responsibilities, and a single point of entry for consumers.

Citizens Advice has published a full response to DESNZ's consultation on reforming consumer protection for home upgrade schemes.

The wider home improvement market

Beyond the ongoing reforms to the green home upgrades market, the proposals outlined in TrustMark's consultation could provide valuable improvements to consumer protection in the wider home repairs and improvements market.

In particular, we welcome the proposal to **strengthen support for consumers when things go wrong**. Our research shows that many consumers struggle to identify where to turn for redress, or receive solutions that are only partial or unsatisfactory. Establishing a single point of escalation could help address these issues, making it easier for consumers to navigate the process and obtain appropriate resolutions.

However, it is also essential to **raise professional standards among traders**. Our research found that even consumers who use approved or accredited traders regularly do not receive basic information, including invoices, written quotes and contact details. In particular, only 22% of consumers who used an approved or accredited trader for their most recent home repair project received information on how to raise a concern or make a complaint.[1] And while we welcome **stronger financial protection**, we note that most purchases in the wider home repairs and improvements market take place in cash. Although cash payments are less prevalent among consumers using approved, accredited or trusted traders, they still account for 47% of transactions in this group.

This picture suggests that, for many consumers, barriers to redress arise well before a complaint is made. It is therefore essential to improve underlying professional practices and standards, alongside simplifying complaints processes and offering financial protections. Improved conduct from traders can both reduce the number of problems consumers experience, and make it easier for them to access redress when things do go wrong. This should include ensuring that traders routinely provide appropriate documentation, such as written quotes and invoices, clear contact details and information on how to raise concerns or make a complaint. TrustMark should also promote the availability of appropriate payment methods, enabling consumers to make informed choices about how they pay and access any protections available to them.

[1] Citizens Advice (2026), Built to fail: How the home repairs market is failing consumers. All subsequent citations are from this report unless otherwise indicated.

We also welcome proposals for **stronger abilities to sanction, suspend or remove traders who engage in poor practice**. Traders in this market are too often able to avoid accountability for poor or negligent work. However, the deterrent effect of these measures may be limited by the wider market context and low levels of consumer awareness of TrustMark. Consumer choices in the home repairs and improvements market are driven primarily by cost, availability and personal recommendations, rather than membership of voluntary schemes. Awareness and use of voluntary schemes remain limited: in our survey of 5,000 UK adults responsible for home repairs and improvements in their homes, 40% had heard of TrustMark, while just 9% had used it. Our qualitative research also suggests that consumers find the number of voluntary schemes confusing and do not necessarily associate membership with better quality or greater protection.

If consumers do not recognise or value scheme membership, removal is unlikely to significantly influence their choice of trader. In practice, traders removed from TrustMark may be able to continue operating with limited commercial consequences, weakening the impact of these sanctions. Citizens Advice has called for **mandatory ADR for this sector**, as well as **expansion of mandatory licensing to more trades** and a **single register for traders**. This would ensure that traders can no longer continue to operate elsewhere in the market after losing accreditation from a voluntary scheme due to poor practice.

The need for reform across the market

Too many consumers face issues within the building and home improvements sector. In 2025 alone, Citizens Advice's Consumer Service received around 37,000 complaints related to home maintenance and improvements - and our Consumer Service recorded almost 5,000 cases related to green home upgrades specifically.[2]

In the green home upgrades market specifically, a lack of robust consumer protection led to catastrophic levels of failure of solid wall insulation measures under the ECO4 scheme.[3] But consumers across the home improvements and repair market can face issues with poor quality work, and difficulties finding solutions when things go wrong - which can lead to financial loss, unsafe conditions in the home, and significant stress and anxiety.

Ultimately, principles for consumer protection reform should be integrated into building regulations and apply across the home improvements market. This should include clear and uniform standards for traders, redress routes for consumers when things go wrong, and robust enforcement levers to remove rogue traders from the market. This would ensure that in future, consumers receive high-quality work and swift remediation for any issues - regardless of whether they are installing a heat pump, insulating their home, or carrying out wider improvement work.

[2] Citizens Advice (2026), Low Carbon Home Upgrades Data Insights report - 2026
[3] National Audit Office (2025), Energy efficiency installations under the Energy Company Obligation