

TrustMark [consultation](#) for TMLP for GBIS and for TM strengthening of financial protection

12 December 2024

1. 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:

- 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

Yes.

2. 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?

Yes, Energy UK supports independent oversight of the building assessment and suitability for intended design.

3. 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?

No. Irrespective of whom the design is completed by, it should be fit for purpose, specify ventilation upgrades applicable and be suitable for the property. The design should be independently assessed alongside the PIBI.

4. 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?

Yes, however, it will be difficult to make an assessment based on evidence such as photos. Clarity is needed on the nature of the post-completion evidence that will be required, and a risk assessment of the potential for fraud within these submissions.

Appropriately time and location-stamped pre-, mid- and post-installation photos, including evidence of ventilation upgrades should be included in the TM lodgement. These should be assessed within TM audit regime.

5. Are there any other aspects or issues in respect of the construct of TMLP for GBIS that you believe require consideration?

Energy UK notes the reference to allowing installers that are ‘working towards’, and urges TrustMark to set clear compliance guidance that ensures the installer is making good progress towards this accreditation. Energy UK supported the Each Home Counts Review, and increasing the number of installers with this accreditation is important for raising quality standards across the retrofit sector.

6. 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.

Yes.

TrustMark should consider the instances where loft insulation may be disturbed by the customer and what the implications are for the financial protections in these cases.

7. Are there any other aspects or issues in respect of financial protection for TMLP for GBIS that you believe require consideration?

Energy UK would support further development to link quality assurance throughout the retrofit journey, from assessment through to completed installation, and the provision of financial protection. For example, use of PIBI passcode to apply for guarantee.

8. 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?

Yes.

- 9. 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?**

Yes.

- 10. 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?**

The entry requirements and application processes set by financial protection providers should be reviewed to avoid unjustified barriers to entry being created, as this can prevent new installers from being able to participate in schemes such as ECO and GBIS.