



Building Stronger Protection for Home Improvement Customers

OSCAR Onsite Ltd | Response to the TrustMark Consultation

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Formal consultation response | 26 October 2026

Executive summary

OSCAR Onsite Ltd welcomes TrustMark's proposed reforms in that we support a simpler consumer journey, stronger redress and improved quality assurance. *However*, meaningful protection depends on demonstrable occupational competence, independent diagnosis, transparent funding decisions, auditable technical evidence and verified remedies.

Our central proposition

Consumer protection should begin before work starts, not when a complaint is made. TrustMark should be able to establish whether work was necessary, who was competent to undertake it, whether it was carried out correctly, and whether the property was left in an appropriate condition.

Priority actions requested of TrustMark

1. Publish occupation-specific competence requirements, verify training and practical assessment, and scrutinise the competence of those awarding accreditation.
2. Audit Registered Business websites and accreditation badges against the precise services and trade categories covered, with enforceable correction and escalation processes.
3. Separate the independent diagnosis of defects from commercial incentives to undertake extraction, replacement or other funded remedial work.
4. Investigate credible patterns of unnecessary ECO-funded interventions, including evidence supporting removal, the funding claimed and the entities benefiting.
5. Record the full property and measure lifecycle: original assessment, operative competence, installation, inspection, extraction, remediation, verification and guarantees.
6. Establish effective independent technical review when credible evidence challenges a decision by a contractor, Scheme Provider or TrustMark itself.
7. Ensure consumer redress delivers a complete evidenced remedy, including appropriate reinstatement and clarity over responsibility for consequential costs.
8. Examine long-term guarantee providers' financial resilience, claims decisions, records access and consumer protection where installers cease trading.
9. Use risk-based auditing and cross-property data to identify recurring failures and verify corrective action, not merely paperwork compliance.
10. Provide a clear case owner, accessible records and an accountable route from complaint to technically verified resolution.

Evidence and scope

This submission draws on OSCAR's practical work in cavity wall insulation inspection, extraction and clearance, occupational competence, technical monitoring and consumer support. The anonymised examples distinguish OSCAR's direct observations from information reported by others and matters requiring independent investigation. References to potential fraud are concerns for appropriate authorities to examine, not findings of criminal conduct.

Reading guide

Sections 1–15 establish OSCAR’s background and technical perspective; Sections 16–18B address consumer journeys, evidence, auditing and competence; Sections 19–24K examine remedies, financial protection, guarantees, funding and prevention; Sections 25–27 set out the detailed recommendations, practical pilot and conclusion.

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1. Introduction

OSCAR Onsite welcomes the opportunity to contribute to TrustMark's consultation on proposed changes to its Quality Scheme and the wider objective of strengthening consumer protection within home improvements.

We recognise the scale of the challenge TrustMark is seeking to address. The proposals include a simpler route to redress, clearer responsibilities between TrustMark, Scheme Providers and Registered Businesses, stronger financial protection, greater use of data and quality assurance, and TrustMark becoming a clearer point of contact for consumers escalating complaints. We understand these remain proposals for consultation rather than settled decisions.

OSCAR's interest in this consultation is not theoretical.

Our experience encompasses the complete journey from consumer complaint and evidential assessment through to technical inspection, occupational competence, contractor accreditation, specialist remediation, technical monitoring and verification of completed works.

In the specialist field of cavity wall insulation, we have seen what can happen when an energy-efficiency measure does not perform as intended; when responsibility becomes difficult for a consumer to establish; when different parties possess different elements of the necessary expertise; and when the evidence required to establish the cause of a problem is either incomplete or absent.

We have also spent more than a decade developing practical mechanisms intended to improve that position.

For that reason, we believe our experience may be useful as TrustMark considers how a simpler consumer-facing system can be supported by sufficiently robust specialist competence, technical evidence, monitoring and accountability behind it.

Our central observation is straightforward:

Consumer protection should not begin when a complaint is made. It should begin with competence, a full and appropriate assessment of the property and relevant evidence *before work starts*. That evidence should continue throughout the work, be properly recorded on completion and remain available if something subsequently goes wrong.

2. About OSCAR Onsite

OSCAR stands for **On Site Competency Assessment Report**.

OSCAR Onsite was established in response to the developing problems surrounding cavity wall insulation and, particularly, the absence at that time of dedicated occupational standards and formal competency pathways for those undertaking specialist CWI surveying, inspection, extraction and clearance.

The OSCAR model was deliberately built around practical competence. The principle was that membership of an organisation, possession of a company certificate or experience in a related activity should not, on its own, be treated as evidence that an individual is competent to undertake a specialist activity.

Competence should be capable of being demonstrated.

That remains fundamental to OSCAR today.

Over the past decade, OSCAR has supported more than 250 contractor businesses through training, accreditation, technical guidance, compliance support and competency development, while also supporting homeowners, landlords, housing providers and local authorities.

What began with competency has progressively developed into a much wider technical-assurance framework around CWI, including contractor accreditation, individual competency, vocational qualifications, independent property inspection, technical monitoring, clearance verification, consumer information and the recording of evidence before, during and after specialist works.

3. The background to our involvement in consumer protection

The present leadership of OSCAR also brings a background that predates our direct involvement in cavity wall insulation extraction.

Alan Hoey, Managing Director of OSCAR Onsite, previously spent approximately eleven years as Managing Director of a business undertaking regulated claims-management activities, licensed by the Ministry of Justice. The business maintained an exemplary regulatory record throughout Alan's period operating within that regulated environment.

That work provided extensive practical experience of consumer complaints, evidence, claims assessment, regulatory compliance, insurance and the importance of establishing whether a claim had a proper evidential and legal basis before attempting to pursue it.

Before entering regulated claims management, Alan worked within the insurance industry. His earlier career was in the Royal Air Force Police Intelligence & Security Squadron, including specialist intelligence led security and close-protection duties, and his RAF service was formally recognised with a decoration.

This background is relevant to our response because OSCAR's approach to consumer protection did not develop solely from the perspective of contractors undertaking building works. It has also been influenced by experience of what happens after something has allegedly gone wrong: the complaint, the evidence, competing expert opinions, liability, causation, loss and ultimately the route available to the consumer.

4. Our early involvement with cavity wall insulation claims

Alan's first involvement with OSCAR arose while he was still working within regulated claims management.

The original inventor of the OSCAR concept approached him because of the emerging issue surrounding cavity wall insulation claims. He wanted to understand how such claims would be considered from a claims and legal perspective: what would need to be demonstrated, what evidence would be required and how the legal basis of a potential claim would be examined.

This led to detailed consideration of the evidence required where CWI was alleged to have failed.

The underlying physical investigations at a property were undertaken separately by an assessor working under OSCAR supervision and by chartered surveyors.

A world-renowned energy expert then relied upon those technical findings when considering alleged financial losses associated with damaged, damp or failed CWI.

A 2018 CWI energy report commissioned as part of that work was expressly prepared as a CPR Part 35-compliant expert report and considered the financial consequences of alleged CWI failure, including loss of anticipated energy savings and potential additional energy costs.

Independent advice was also obtained from King's Chambers in 2018 concerning the respective roles of the different expert disciplines.

That advice recognised that evidence concerning physical remedial works and evidence concerning consequential heating or energy loss were distinct matters. Counsel specifically observed that the disciplines required different skill sets and that it would be reasonable for the respective questions to be addressed by experts possessing the relevant expertise.

That experience established a principle which remains highly relevant to this consultation:

Different technical questions require different competencies.

A person competent to install an energy-efficiency measure is not necessarily competent to diagnose its failure.

A person competent in inspecting a building generally is not necessarily a specialist in the performance or extraction of a particular insulation system.

Similarly, competence to remove CWI should not automatically be assumed from competence to install it.

The consumer cannot reasonably be expected to understand all of those distinctions. Indeed, the 2018 expert evidence itself observed that consumers rely upon the knowledge and guidance of those possessing the relevant expertise.

5. Lessons from the CWI claims market

The CWI claims market that developed during this period expanded quickly and subsequently contracted just as quickly.

Our experience was not that the underlying problems simply ceased to exist. There were consumers with genuine concerns and properties requiring proper investigation.

However, in our experience the claims environment also became affected by variable standards, commercial pressures and shady practices among some of the businesses and professional participants operating around that market. The growth of funded claims models brought additional complexity and commercial pressure.

Our view is that this ultimately damaged confidence in an area where legitimate consumer problems nevertheless existed.

We make this point carefully. It is not our intention to revisit historic claims or make allegations against particular organisations or professions.

The lesson we took from that period was much more important:

A claims process should never be allowed to become a substitute for establishing the underlying technical facts.

Closing or restricting a route to litigation does not make a defective property sound. Equally, the existence of damp or mold does not establish that cavity wall insulation is responsible.

The first question should therefore not be:

“Who can we claim against?”

Nor should it automatically be:

“Who can remove the insulation?”

The first question should be:

“What is actually wrong with the property, and what does the evidence demonstrate?”

That philosophy became increasingly important in the subsequent development of OSCAR Onsite.

6. An energy-efficiency measure can produce the opposite outcome

Our earlier CWI work also demonstrated another issue which remains highly relevant to retrofit quality assurance.

The 2018 expert evidence considered circumstances in which defective or compromised CWI could fail to deliver the anticipated improvement. Advice obtained from King's Chambers recorded that the energy evidence concerned both failure to achieve the expected improvement and alleged losses where the pre-existing thermal position had been made worse.

The energy expert also identified factors including moisture, gaps, inconsistent insulation density and other installation characteristics as capable of adversely affecting thermal performance. There is an important consumer-protection lesson here.

Recording that an energy-efficiency measure has been installed is not the same as demonstrating that it continues to perform as intended.

In certain circumstances, an intervention intended to reduce heat loss can fail to achieve the promised benefit and may contribute to an adverse outcome.

This is one reason why OSCAR believes the retrofit data lifecycle should not end at installation or initial lodgement.

If a measure is subsequently inspected, found defective, remediated, extracted or replaced, that later history is relevant to the continuing technical record of the property.

TrustMark's proposal to open its Data Warehouse to more work carried out under the Scheme and use richer data to strengthen consumer protection therefore presents an important opportunity to consider the whole lifecycle of a measure, rather than recording installation as the end point.

7. Moving from claims towards competence and prevention

When Alan became directly involved in the leadership of OSCAR Onsite in 2020, the experience of the earlier CWI claims environment helped influence the direction in which OSCAR subsequently developed.

The objective was not to create another organisation whose principal purpose was simply to provide a membership badge.

Instead, OSCAR increasingly focused upon the mechanisms capable of preventing problems, identifying them properly when they arise and providing evidence of the work subsequently undertaken.

That means considering the company, the individual operative, the property, the technical evidence and the completed work.

It also means recognising that consumer protection requires intervention at different stages.

Sometimes the correct outcome of an inspection will be that CWI requires extraction.

Sometimes remedial work may be appropriate.

Sometimes another building defect may be responsible for the symptoms being experienced.

And sometimes the evidence may not support significant intervention at all.

An effective consumer-protection system should be capable of reaching each of those conclusions.

8. Developing occupational competence

One of OSCAR's most significant contributions to the CWI sector has been its involvement in creating formal occupational competence pathways.

OSCAR did not simply adopt an existing generic insulation qualification.

Working with industry participants and GQA Qualifications, OSCAR developed the specialist Level 2 vocational pathways covering Cavity Wall Insulation Surveying & Inspection and Cavity Wall Insulation Extraction & Clearance. OSCAR's historical material records that the development involved a panel drawn from the CWI industry, including system designers, extraction firms, insulation installers and chartered surveyors, followed by testing and trials before launch.

The current extraction and clearance qualification remains a work-based qualification requiring candidates to demonstrate competence in actual cavity wall clearance and extraction activity.

The surveying and inspection pathway similarly requires practical demonstration of the skills and knowledge needed to undertake cavity surveys and inspections.

This matters to the TrustMark consultation because it demonstrates the difference between company registration and occupational competence.

Both have value, but they answer different questions.

A business may satisfy the requirements to participate in a scheme. The consumer still needs confidence that the individual carrying out a specialist task possesses the competence required for that particular task.

That distinction is fundamental to OSCAR's response.

9. Taking the argument beyond our own sector

OSCAR has consistently sought to take these issues beyond conversations taking place solely within the cavity wall insulation industry.

At the launch of the Green Skills Academy at Trafford Park, OSCAR had the opportunity to engage directly with senior representatives from Greater Manchester, including Andy Burnham, Mayor of Greater Manchester at that time, and the Lord-Lieutenant of Greater Manchester, who attended following an invitation from OSCAR.

The event provided an opportunity to explain why OSCAR had been created, what we were seeing within the CWI sector and why we believed considerably greater emphasis was required upon inspection, competency and the condition of the existing building before additional energy-efficiency measures were prescribed.

An important part of that conversation was the principle of “fabric first”.

Our concern then, as it remains now, was that the success of retrofit cannot simply be measured by the number of measures installed. The existing building fabric has to be properly understood. Defects, moisture pathways, ventilation, exposure, construction and existing insulation all have the potential to affect the outcome of a retrofit intervention.

The Mayor understood the principle we were putting forward. In the months that followed, we noted similar public emphasis upon the importance of a fabric-first approach. We do not suggest that OSCAR originated that principle, nor that subsequent statements resulted from our conversation. The significance for us was that a senior regional decision-maker readily understood an issue which we had been trying to communicate from practical experience within the sector.

It reinforced our view that good retrofit starts with understanding the building that already exists, rather than starting with the measure somebody wishes to install.

Parliamentary recognition of distinct installation and extraction competence

On 21 February 2024, in the Westminster Hall debate “Cavity Wall Insulation: Government Support”, Hywel Williams MP (then Member for Arfon) raised difficulties faced by consumers pursuing cavity insulation claims and the technical consequences of unsuccessful removal and remediation.

Mr Williams stated: “CIVALLI says that installation and extraction should be done by separate providers, each with proper accreditation, for example by TrustMark or Oscar.” This is an attributed account of CIVALLI’s position, expressed in Parliament; it is not a Government appointment of OSCAR or an assertion that the two organisations have identical functions.

The relevance to this consultation is clear: competence in installing cavity insulation is not interchangeable with competence in diagnosing defects, extracting insulation, managing contamination or verifying remediation. Independent, occupation-specific assessment and oversight should therefore be recognised as distinct requirements.

Primary source: UK Parliament, Hansard, Westminster Hall, 21 February 2024, “Cavity Wall Insulation: Government Support”: <https://hansard.parliament.uk/commons/2024-02-21/debates/23CD5DA7-F980-4F42-A274-616039D7D456/CavityWallInsulationGovernmentSupport>

10. When consumer protection fails in practice

There are individual cases which have profoundly influenced OSCAR's view of consumer protection. They demonstrate why the discussion cannot end with standards, accreditation, complaints procedures or administrative compliance. Ultimately, the system has to work for the person living in the property.

An anonymised homeowner experience

One case concerns a homeowner and her children whose property and living circumstances were seriously affected following cavity wall insulation works.

OSCAR became involved after serious problems developed at the property following cavity wall insulation works and subsequent extraction and reinstatement. The case demonstrates the human consequences of technical failures and ineffective redress.

The homeowner faced significant personal and family pressures while attempting to understand a highly technical industry and secure a safe home. OSCAR provided extensive support and saw at first hand the imbalance between an individual consumer and installers, funders, certification bodies, guarantee providers, Scheme Providers and other organisations.

As OSCAR continued asking questions, examining evidence and supporting the homeowner, we experienced resistance, warnings and pressure from parts of the industry to withdraw or cease our involvement. This is OSCAR’s account of its experience, not a determination of the motives or conduct of any particular organisation.

That experience raised a question which remains highly relevant to this consultation: if an informed industry organisation can encounter substantial resistance when challenging what has happened to a property, what realistic chance does an ordinary homeowner have of navigating the same system alone?

The homeowner has reported that some repairs were undertaken but considers their standard unsatisfactory. The scope, timing and technical adequacy require further verification. This anonymised account is provisional and must not be read as an independently established finding against any party.

For OSCAR, this demonstrates the distinction between a complaints process and consumer protection. A consumer can have a complaint number, correspondence, inspections, referrals and reviews. None of those things, by themselves, gives a family its home back.

OSCAR has subsequently identified an additional dimension to this case: whether the original removal and replacement of existing CWI was justified and properly funded. The homeowner had sought loft insulation; the replacement CWI and the reported funding figure raise questions requiring the original technical and ECO records. Section 24E addresses those questions without treating suspicion or referral as proof of fraud.

A second anonymised homeowner experience

A second case involves a homeowner who compiled a substantial documentary record of a prolonged ECO4 dispute.

The homeowner assembled detailed technical evidence and correspondence concerning compliance records, complaints handling, independent review, regulatory engagement and legal proceedings.

The record describes repeated attempts to obtain a competent technical investigation, urgent protection and restoration of a functional home while responsibility moved between organisations and physical problems remained unresolved.

We do not ask TrustMark to accept every allegation or legal conclusion advanced by either homeowner or any other consumer merely because it has been made. An evidence-led assessment remains essential.

The second case illustrates the burden of reconstructing design information, obtaining records, comparing technical data, commissioning expert evidence, preserving evidence, coordinating organisations, investigating insurance routes and preparing for litigation.

A consumer should not need to become a building pathologist, retrofit specialist, investigator, records manager and lawyer before somebody is prepared to establish what has happened to their home.

The second case also demonstrates why independent technical assessment must be properly scoped, genuinely independent and connected to an outcome.

The case record describes TrustMark moving beyond referral and undertaking to procure an independent review intended to provide an evidence-based understanding of the property and potential outcomes. He subsequently disputed important aspects of that process, including the evidence considered, the scope of the investigation, factual matters and whether the resulting technical work produced a clear determination and route to remediation.

What these experiences teach us

These are two different anonymised homeowner experiences. We do not suggest that their circumstances are identical or that this consultation should determine the legal merits of either dispute.

We do not ask TrustMark to accept every allegation or legal conclusion advanced by any homeowner simply because it has been made. That would be contrary to the evidence-led approach advocated throughout this response. The point is that the consumer-protection system must be capable of determining such allegations properly.

A consumer should not need to become a building pathologist, retrofit specialist, investigator, records manager and lawyer before somebody is prepared to establish what has happened to their home.

The system should be capable of obtaining the relevant records, identifying the appropriate technical specialists, inspecting the work, distinguishing allegation from fact, determining what has failed, establishing responsibility where appropriate and then driving the matter towards an evidenced resolution.

Commissioning an inspection is not enough. There should be clarity about the questions the expert is being asked to determine, the competence required to answer them, the evidence supplied by each party, the opportunity to correct factual inaccuracies, the findings reached, what those findings mean and what action follows.

The ultimate test of a consumer-protection system is whether it produces an appropriate and timely resolution. A complaint number, correspondence, inspections, referrals and reviews are processes; they are not, by themselves, a remedy.

11. Extending competence beyond contractors

Our experience has also demonstrated that better outcomes cannot be achieved by concentrating exclusively upon installers and extraction contractors.

Surveyors, Domestic Energy Assessors, retrofit professionals, housing officers and other property professionals may encounter CWI when working in totally different products and services, and may influence what subsequently happens to a property and its cavity wall insulation.

For that reason, OSCAR has developed a new CWI Awareness for Surveyors CPD Course.

The intention is not to turn every surveyor or energy assessor into a specialist CWI inspector.

Quite the opposite.

It is intended to improve awareness of CWI, the signs and circumstances which may warrant further investigation, the limitations of a general inspection and, importantly, when specialist investigation should be sought rather than conclusions being reached outside the professional's particular area of competence.

This reflects the same principle encountered during our work in 2018:

recognise the boundary of competence and refer the specialist question to the appropriate specialist.

12. Independent CWI Condition Inspection

That philosophy now sits behind OSCAR's CWI Condition Inspection Survey.

A consumer reporting damp, mold, cold walls or other concerns should not automatically be told that their cavity wall insulation has failed.

Those symptoms can have different causes.

The OSCAR inspection therefore considers the external building as well as the insulation itself. The inspection examines potential moisture-ingress risks and building defects and combines that assessment with specialist borescope examination of the cavity, insulation distribution and condition, voids, debris, moisture and other relevant factors.

The objective is evidence-led diagnosis:

Inspect first. Understand the problem. Then determine the appropriate action.

This protects consumers from both sides of the problem.

It helps identify genuine CWI defects where they exist, but it also reduces the risk of expensive extraction being recommended simply because insulation is present in a property experiencing damp.

13. Technical monitoring, verification and the evidence trail

OSCAR has also developed its approach beyond initial competency and inspection into the monitoring of actual work.

This is important because accreditation should not mean that competence is assessed once and thereafter simply assumed.

Our developing model is based upon a continuing chain of assurance:

Competent business → competent individual → appropriate inspection → evidence-based intervention → evidence during the work → technical monitoring → verification of completion → enduring property record.

That is particularly relevant to TrustMark's proposal for additional onsite auditing. TrustMark's current consultation FAQs make clear that its proposed audits of installed work are intended to provide an additional layer of assurance rather than replace the role of Certification Bodies in determining competence.

We agree with that distinction.

OSCAR's own experience indicates that competency assessment and inspection of actual completed work are complementary, not interchangeable.

14. A broader quality-assurance perspective

OSCAR's approach is also informed by practical experience outside cavity wall insulation. A broader experience reinforces OSCAR's view that quality assurance is strongest when it is based not simply on compliance at the beginning of a process, but on evidence throughout the lifecycle of the intervention.

It also demonstrates why independent external scrutiny matters. An organisation whose conduct, referral decisions or complaint handling is itself disputed should not be the sole final judge of its own performance.

TrustMark should publish clear routes for genuinely independent review, including referral of potential consumer-law breaches to the appropriate Trading Standards service or other competent regulator.

Trading Standards is an enforcement body, not a substitute individual ombudsman; the respective remits must be explained.

15. Why OSCAR is responding

We therefore approach the TrustMark consultation from several perspectives.

We have substantial experience of regulated consumer claims and complaints.

We have substantial experience of insurance and evidential assessment.

We have seen the consequences of CWI disputes when the technical and legal questions become confused.

We have participated in the creation of occupational competency pathways.

We train and assess specialist operatives.

We accredit specialist businesses.

We independently inspect properties.

We technically monitor extraction work.

We support consumers trying to understand what has happened to their homes.

And we are developing increasingly detailed systems for recording what happened before, during and after specialist intervention.

TrustMark's own recent consumer research found substantial gaps in consumers' knowledge of home-improvement protections, including that nearly three quarters did not know about the protections available to them.

We therefore support the ambition to make the consumer journey considerably simpler.

But our experience leads us to one important qualification:

A simpler consumer-facing system must not result in the specialist technical system behind it becoming less rigorous.

There can be one clear door for the consumer without expecting everything behind that door to be undertaken by the same organisation or profession.

TrustMark can potentially provide a much clearer route into complaints and redress.

Scheme Providers and Certification Bodies can fulfil their respective assurance and certification responsibilities.

Specialist organisations can provide the particular technical expertise required where a dispute concerns a specialist measure or activity.

And appropriately competent businesses can undertake remediation where remediation is actually required.

The challenge is to connect those elements in a way that is understandable to the consumer, technically robust, transparent and properly evidenced.

That is the perspective from which OSCAR Onsite makes the remainder of this consultation response.

16. A single point of contact - but not a single point of failure

OSCAR supports TrustMark's proposal to provide consumers with a clearer single point of contact for complaints and redress.

The present system can require consumers to navigate between installers, Scheme Providers, Certification Bodies, guarantee providers, obligated suppliers and other organisations simply to establish who is responsible for dealing with their concern. Simplifying that journey is therefore welcome.

However, there is an important distinction between providing one clear route into the system and expecting one organisation to possess all of the technical competence required to resolve everything which subsequently comes through that route.

There is also a practical question of capacity.

If TrustMark becomes the principal point of contact for substantially greater numbers of consumer complaints, involving multiple measures and technical disciplines, it must be capable of managing those cases within reasonable timescales. Otherwise, fragmentation could simply be replaced by a central bottleneck.

There is a second safeguard which OSCAR believes is equally important:

What happens when TrustMark gets it wrong?

No consumer-protection organisation, Scheme Provider, Certification Body, contractor or professional adviser should be regarded as incapable of reaching an incorrect technical conclusion.

Evidence can be missed. Investigations can be inadequately scoped. The wrong specialist can be appointed. Relevant information can emerge later. A technical opinion may reasonably be challenged by another appropriately competent specialist.

A stronger TrustMark model should therefore include a clearly defined route to independent technical review.

Where TrustMark has reached or relied upon a technical conclusion and the consumer can demonstrate reasonable grounds for challenging it, there should be a mechanism for an appropriately competent independent specialist, *outside the organisations responsible for the original determination*, to review the technical issues in dispute.

This should not amount to an automatic right to repeated surveys simply because a consumer disagrees with an outcome.

Reasonable grounds might include credible contrary technical evidence, a material factual error, relevant evidence which was not considered, significant new evidence or a reasonable question concerning the competence or independence of the person who provided the original assessment.

The independent review should also be focused upon the technical questions actually in dispute rather than automatically restarting the entire complaint.

This is particularly important because independence alone is not sufficient.

As OSCAR's experience has demonstrated, different technical questions require different competencies.

A general building surveyor may be entirely competent within their own discipline without possessing specialist knowledge of a particular insulation system. An installer may understand installation without possessing the building-pathology expertise required to establish causation. Similarly, competence to install CWI should not automatically be regarded as competence to inspect its performance or undertake specialist extraction and clearance.

The question should therefore be:

What needs to be determined, and who possesses the appropriate competence and independence to determine it?

OSCAR also believes the revised framework should recognise independent technical reports commissioned directly by consumers, where the report writer has a *specific technical qualification* relating to the complaint.

Such a report should not automatically be accepted simply because the consumer commissioned it. However, where it has been prepared by an *appropriately competent independent specialist* and is supported by *relevant qualifications* and relevant evidence, there should be a formal mechanism for that evidence to be considered as part of the TrustMark review process.

Where a material conclusion within such a report is rejected, the consumer should receive a reasoned explanation of why.

This could also assist TrustMark with the potential capacity issue.

TrustMark does not necessarily need to employ internally every specialist it may ever require. A more scalable model could provide access to a network of appropriately competent independent specialists and specialist organisations which can be called upon according to the particular technical questions arising within a case.

TrustMark could therefore remain the single consumer-facing point of contact and owner of the complaint, while drawing upon specialist competence from outside TrustMark where required.

One clear door for the consumer does not have to mean one organisation undertaking every function behind that door.

Nor should one clear point of contact become one technical opinion which cannot reasonably be challenged.

In OSCAR's view, the stronger model would combine:

a clear consumer route into TrustMark; TrustMark ownership of the complaint; access to the appropriate specialist competence; recognition of *credible independent evidence*; and a proportionate independent review mechanism where a technical determination is reasonably challenged.

That would simplify the consumer journey while retaining an important safeguard against delay, inadequate investigation or an incorrect technical outcome.

17. The evidence and data lifecycle - the record must follow the property

OSCAR welcomes TrustMark's proposal to make greater use of its Data Warehouse and to extend the information available within the Scheme.

However, we believe there is an opportunity to consider something more fundamental than simply collecting additional information at the point at which an energy-efficiency measure is installed.

The record should follow the complete lifecycle of the measure and, ultimately, reflect the real condition of the property.

At present, considerable emphasis across retrofit is understandably placed upon recording that a measure has been installed, who installed it, under which scheme it was delivered and whether the appropriate requirements were recorded as having been satisfied at that time.

That is important information.

But it is only the beginning of the story.

A measure may remain within a property for decades. During that period it may subsequently be inspected, questioned, found defective, partially remediated, completely remediated, extracted, replaced or otherwise altered.

The information held about the property should be capable of reflecting those subsequent events.

This is particularly relevant to cavity wall insulation.

If CWI is recorded as having been installed at a property and is subsequently independently inspected and found to contain significant defects, the original installation record remains historically correct: the insulation was installed.

But that record alone no longer adequately describes the current position.

If the insulation is subsequently extracted, it becomes even more important that the record is updated. A future homeowner, surveyor, Domestic Energy Assessor, retrofit professional, lender, insurer or contractor should not be presented with an administrative record suggesting that insulation remains within a cavity from which it has actually been removed.

The same principle applies more widely across retrofit.

The administrative record should follow the physical reality of the property.

This issue has already arisen repeatedly within OSCAR's experience and is why we believe the data trail should extend beyond installation through subsequent concern, inspection, technical findings, remediation, extraction or replacement and final verification.

Recording a concern should not automatically condemn a measure

There is an important balance required here.

A consumer raising a complaint should not automatically cause an installed measure to be recorded as defective.

Likewise, the commissioning of an independent survey does not itself demonstrate that something is wrong.

OSCAR has consistently advocated an evidence-led approach.

Damp, mold, cold walls, condensation or other symptoms may result from many different causes. The presence of cavity wall insulation within a property experiencing those symptoms does not, by itself, demonstrate that the insulation is responsible.

That is why OSCAR's own inspection philosophy is:

Inspect first. Understand the problem. Then determine the appropriate action.

The same principle should apply to the property record.

The system should be capable of recording that a concern has been raised without prematurely determining the outcome of that concern.

A lifecycle status for installed measures

OSCAR believes TrustMark could consider whether measures recorded within the Data Warehouse should have a continuing status rather than effectively having only a historical installation record.

For example, depending upon the circumstances and the evidence available, the status of a measure might progress through stages such as:

Installed / Completed

Concern Raised

Under Technical Investigation

No Defect Identified

Defect or Non-Compliance Identified

Remediation Required

Remediation in Progress

Remediated

Extracted / Removed

Replaced

Completion Independently Verified

The precise terminology would clearly require further development and would differ between measures.

The important principle is that the record should be capable of changing when the physical or technical position changes.

This would also avoid a binary system in which a measure appears either to be compliant or non-compliant while a genuine technical investigation is still underway.

The evidence behind the status

A status should not simply be changed because somebody presses a button.

Changes should be supported by appropriate evidence.

Depending upon the intervention, that evidence could include the original property assessment, installation records, photographs, technical monitoring information, subsequent inspection reports, specialist investigations, evidence produced during remedial work and final verification.

For specialist remediation, OSCAR believes there is considerable value in recording evidence before, during and after the intervention.

That is the model we have increasingly developed within cavity wall insulation extraction and clearance.

The objective is not simply to produce more photographs.

It is to create a coherent evidence trail capable of demonstrating:

what was found;

why intervention was considered necessary;

what work was undertaken;

who undertook it;

whether the individual possessed the appropriate competence;

what was found during the work;

whether the intended intervention was completed; and

what condition the property or measure was left in afterwards.

This reflects OSCAR's developing chain of assurance:

Competent business → competent individual → appropriate inspection → evidence-based intervention → evidence during the work → technical monitoring → verification of completion → enduring property record.

Recording the individual as well as the company

We also believe the data opportunity extends beyond identifying the Registered Business responsible for the work.

Where specialist activity is undertaken, consideration should be given to recording the appropriately competent individual or individuals responsible for relevant elements of that activity.

This reflects the distinction made earlier in this response between company registration and occupational competence.

A company may be appropriately registered to participate within a scheme, while the consumer also needs confidence that the person undertaking a particular specialist task possesses the competence required for that task.

A stronger digital record therefore has the potential to connect the property, measure, business, individual competence and evidence of the actual work undertaken.

That could provide considerably greater assurance than recording company participation alone.

The record should also show successful resolution

It should not become simply a database of problems.

Where a defect has been identified and subsequently put right, the record should show that too.

A property should not carry an indefinite administrative stigma because a problem occurred at some point in its history.

If appropriate remediation has been undertaken and independently verified, that should form part of the enduring record.

Indeed, a properly documented property in which a historic defect has been identified, professionally remediated and independently verified may ultimately possess a better evidence trail than a property where no meaningful post-installation inspection has ever taken place.

That distinction could become increasingly important as retrofit records begin to influence future property transactions, lending, insurance and further energy-efficiency interventions.

Access for the homeowner

OSCAR also believes consumers should have reasonable access to the information and evidence recorded against their own property.

If photographs, installation records, inspection findings, monitoring evidence, remediation records and verification information are being relied upon as part of the technical history of someone's home, the homeowner should be able to see that information and, where appropriate, obtain a copy of it, free of charge.

This would also help consumers identify obvious factual errors at an earlier stage.

Where a homeowner believes information recorded against their property is factually incorrect, there should be a clear mechanism for that information to be challenged and, where appropriate evidence supports the challenge, corrected.

Again, this does not mean that a homeowner should be able simply to delete an adverse technical finding.

It means that the enduring record should itself be subject to appropriate evidence and accountability.

Data can also identify problems before complaints escalate

A sufficiently detailed Data Warehouse should not only help resolve individual complaints after something has gone wrong.

Over time, it could help identify patterns.

For example, repeated defects associated with a particular measure, contractor, installation method, property type, geographical area or technical detail may become visible through aggregated data before those individual cases develop into a much larger problem.

Similarly, unusually high levels of remediation, extraction or repeat intervention could provide an indication that further investigation or targeted auditing is required.

That creates the possibility of moving quality assurance from a largely reactive model towards a more preventative one.

The system could begin asking not simply:

“Has this installation been lodged?”

but also:

“What happened to it afterwards?”

That is potentially far more valuable to consumers, industry and government.

18. Auditing should examine the work, not simply the paperwork

OSCAR therefore also welcomes the principle of increased onsite auditing.

However, we believe it is important to distinguish between three related but different questions:

Is the company entitled to participate within the Scheme?

Is the individual competent to undertake the particular activity?

Was the work at this particular property actually undertaken correctly?

Those questions are connected, but they are not interchangeable.

A company can possess the appropriate registrations and certifications.

An operative can possess the appropriate qualification and demonstrated competence.

And a particular piece of work can still be defective.

Conversely, the discovery of a defect on one property does not automatically establish that every piece of work undertaken by that company or operative is defective.

Effective quality assurance therefore requires both competence assessment and examination of actual work.

TrustMark's proposal for additional onsite auditing provides an opportunity to strengthen that distinction.

Risk-based auditing

OSCAR would encourage TrustMark to consider whether auditing can increasingly be informed by risk and data rather than relying solely upon a uniform inspection frequency.

As the Data Warehouse becomes richer, patterns may become capable of informing where additional scrutiny is required.

For example, an increased level of complaints, repeat remedial interventions, unusual failure patterns or other recurring technical findings could potentially trigger additional auditing.

The purpose should not be to punish a business because a complaint has been made.

Complaints are allegations until properly investigated.

Rather, aggregated evidence can be used intelligently to identify where further assurance may be justified.

Equally, evidence of consistently well-documented work, effective technical monitoring and satisfactory outcomes should be capable of contributing positively to the assurance picture.

Auditing should generate useful evidence

Where an onsite audit takes place, its value should extend beyond a simple pass or fail result.

The audit should contribute to the enduring evidence record.

If defects are identified, the record should show what they were, what corrective action was required and whether that corrective action was subsequently completed and verified.

If the work is found satisfactory, that conclusion should also be recorded.

This closes the loop between competence, inspection, intervention, monitoring, auditing and the property record.

It also brings us back to the central principle running throughout OSCAR's response:

Consumer protection should not begin when a complaint is made.

The strongest consumer-protection system is one which creates sufficient competence, evidence, monitoring and accountability that fewer consumers need to enter the complaints system in the first place.

18A. Registered Business websites, accreditation claims and Scheme Provider oversight

OSCAR recommends a comprehensive review of the websites, service pages, social media and promotional material of TrustMark Registered Businesses. Verification must extend beyond entitlement to display the TrustMark logo: the overall presentation must accurately reflect the specific trades, activities, qualifications and services for which a business is approved.

A business may legitimately hold several memberships and accreditations covering different activities. Yet prominent displays of multiple logos on a particular service page can suggest to the ordinary homeowner that every displayed organisation has independently approved the advertised service. A genuine badge can still create a misleading impression when displayed outside its relevant scope. General business approval, technical accreditation, individual qualifications, manufacturer authorisation, warranty arrangements and TrustMark registration are distinct matters.

OSCAR's direct experience of a previous Scheme Provider referral

More than two years ago OSCAR raised this concern directly with an established TrustMark Scheme Provider concerning one of its Registered Businesses. OSCAR had been representing a homeowner in a dispute involving cavity wall insulation extraction and subsequent refill works. The homeowner expressly told OSCAR that the company's array of accreditation badges had influenced her decision to appoint it, because she understood them as reassurance that the particular specialist activity was independently approved.

OSCAR advised the Scheme Provider of concerns about the relevance and presentation of those credentials. In OSCAR's subsequent observations, the relevant website representations have remained substantially unchanged. We deliberately do not identify the Scheme Provider or Registered Business in this public consultation. Nor do we assert that every badge was invalid, or that the underlying consumer complaint established misconduct. The issue is whether the referral was investigated, whether each accreditation's scope was checked and whether any necessary corrections were verified.

OSCAR's experience indicates that this is not an isolated concern. Hundreds of websites across property preservation, insulation, roofing, retrofit and associated trades display collections of membership and accreditation logos.

That is an observation from our sector experience, not the result of a completed statistical audit. It nonetheless justifies a structured, risk-based review.

A mandatory advertising and accreditation-scope audit

TrustMark should require Scheme Providers to check: (1) the identity and current status of each claimed approval and the legal entity holding it; (2) its precise service and trade-category scope; (3) whether the badge's placement on individual service pages creates an unsupported impression; (4) whether qualifications are held

by named competent individuals rather than attributed indiscriminately to the business; (5) whether guarantees, insurance and manufacturer approvals apply to the advertised work; (6) whether subcontractors and operatives fall within the claimed approval; and (7) whether expired or suspended approvals are removed promptly.

Initial registration, renewal, routine monitoring and credible complaints should each provide a trigger for such checks. A documented correction process must identify the responsible person, required amendments, completion date and evidence of subsequent verification. The Scheme Provider's inaction or disputed conclusion should be capable of independent escalation to TrustMark.

The test should be the overall impression conveyed to the average consumer, not merely whether a qualifying limitation appears in obscure technical documentation. TrustMark should publish or require a readily verifiable, service-specific schedule showing what each Registered Business is approved to undertake and under which Scheme Provider. Where a business advertises activities outside its TrustMark registration, that boundary should be clear.

OSCAR recommends express incorporation of website and accreditation-scope checks into TrustMark's revised Framework Operating Requirements, supported by a retrospective risk-based review of existing Registered Business websites. The objective is accurate marketing and informed consumer choice, not the suppression of legitimate credentials.

18B. Genuine training, recognised qualifications and verified occupational competence

A further fundamental question is whether TrustMark checks that the training, assessment and accreditation relied upon by Scheme Providers are genuine, sufficiently rigorous and appropriate for the work concerned. There is a material distinction between attendance at an awareness session, a CPD certificate, a privately issued course completion certificate, a regulated vocational qualification and independently assessed practical occupational competence. None should automatically be represented as interchangeable with another.

TrustMark already has published competence and audit requirements. OSCAR does not suggest that no framework exists. The question is how those requirements are applied, what evidence is accepted, whether different Scheme Providers impose comparable standards for the same specialist activity and whether TrustMark independently tests the technical adequacy of the assessment process.

Training recognition and evidence of competence

For each specialist trade category, TrustMark should establish which competence standards apply, what qualification or alternative evidence is accepted, who issues and verifies certificates, and whether the assessment includes observed practical work where appropriate. Checks should consider the training organisation's legal identity, relevant recognition or regulation, learning outcomes, assessment methodology, assessor qualifications, external quality assurance, authenticity of records and continuing competence.

A useful awareness course may help a surveyor recognise when to refer a problem; it does not by itself establish competence to diagnose a concealed insulation defect or undertake extraction. CPD recognition demonstrates a particular form of learning recognition, not necessarily formal occupational qualification or practical capability. Conversely, TrustMark should not prescribe one exclusive commercial provider where credible equivalent competence pathways exist.

OSCAR's work with GQA Qualifications in developing specialist Level 2 vocational pathways for Cavity Wall Insulation Surveying & Inspection and Cavity Wall Insulation Extraction & Clearance illustrates the distinction. Installation, condition diagnosis, extraction, clearance and verification require different competencies. The

operative's capability should be demonstrated for the actual task rather than assumed from company membership or a related qualification.

Who assesses the assessor?

TrustMark should verify that Scheme Providers and any contracted assessors possess the technical knowledge to judge the trades for which they register businesses. It should examine assessor independence, impartiality, conflicts, sample assessment records and the quality of actual decisions. The same scrutiny should extend to third-party training or accreditation providers whose credentials are used to support registration.

Where training, membership, assessment and accreditation are sold by commercially connected organisations, the relationship should be transparent and safeguards documented. Payment for a course or membership must not become an effective guarantee of competence approval.

Recommended action

OSCAR recommends an independently reviewable register or published matrix of occupation-specific competence expectations and accepted evidence, with clear distinctions between awareness, CPD, formal qualifications, practical assessment and ongoing technical monitoring. Scheme Providers should verify named operatives and subcontractors, retain auditable records and re-check competence when personnel or work scopes change. TrustMark should publish how equivalence between accepted pathways is established and how credible challenges to inadequate assessment are investigated.

The consumer needs assurance not simply that a certificate exists, but that it represents meaningful competence for the specialist activity being purchased.

19. Financial protection must be connected to technical resolution

OSCAR supports the principle of stronger financial protection for consumers.

Where work has failed, a business has ceased trading or a consumer is otherwise left with a legitimate unresolved problem, appropriate financial protection can be essential.

However, financial protection and technical resolution are not the same thing.

Before the appropriate financial remedy can be determined, somebody still needs to establish:

what is actually wrong;

whether the installed measure is responsible;

what work is required to correct the problem;

whether other building defects are contributing to the symptoms;

the reasonable scope and cost of remediation; and

how successful completion will subsequently be verified.

Without that technical foundation, there is a risk that financial protection simply funds an assumed solution rather than the correct one.

This is particularly important in areas such as cavity wall insulation.

The presence of damp or mold does not establish that CWI should be extracted. Equally, the fact that insulation appears satisfactory at some inspection locations does not necessarily establish that the installation as a whole is satisfactory.

Defective insulation is not necessarily capable of a certified partial repair

The presence of damp or mold does not, by itself, establish that cavity wall insulation should be extracted. Equally, satisfactory observations at a limited number of inspection points do not establish the condition of an entire concealed installation. Repair of an unrelated building defect must be distinguished from attempting to repair a defective insulation system.

OSCAR questions the technical and certification basis for proposals to top up existing defective insulation, fill isolated voids or introduce additional material into an unknown or partially failed system. Before such an approach is represented as acceptable, the proponent should identify the precise applicable BBA certificate or other recognised system approval, its scope and limitations, and evidence that the proposed intervention falls within it. OSCAR is not asserting without a certificate-by-certificate review that no exceptional approved method can exist.

The evidence must address mixed-material compatibility, moisture movement, fire and thermal performance, accurate identification and measurement of voids, the completeness of filling, pre-existing contamination and obstructions, the competence of the operative, independent verification, responsibility for cost and the continuity and scope of guarantees. Without those answers, an apparently inexpensive partial intervention risks leaving the consumer with an unverified hybrid installation and divided liability.

Where the CWI system itself is established to be defective, the options should be assessed against an evidence-based whole-system remedy, including complete extraction and, only where the property is subsequently found suitable following necessary enabling works, a properly designed and guaranteed replacement installation.

Diagnose first. Determine the appropriate intervention. Then establish how that intervention should be funded.

That principle protects both the consumer and the financial protection mechanism from unnecessary or inappropriate expenditure.

Financial protection should fund the complete remedy

Where liability or eligibility for financial protection has been established, the scope of that protection should also reflect what is reasonably required to return the consumer to an appropriate position.

A successful extraction claim may still leave the homeowner at a loss

The scope of CIGA or other guarantee protection depends upon the specific guarantee and its terms. In practice, an upheld claim may fund removal of defective insulation without necessarily meeting every cost arising from the original failure. TrustMark should examine the resulting protection gap rather than treating payment for extraction as proof of a complete remedy.

The full cost of putting the property right may include consequential damp damage, plaster and decorative reinstatement, repair of building defects and necessary enabling works, temporary accommodation, increased heating costs, independent inspections and, if a suitably qualified assessment confirms the property is appropriate for CWI, a new compliant insulation installation. Each element requires an evidenced determination of causation, eligibility, contractual responsibility and available legal remedies; it cannot simply be presumed to be covered by an existing guarantee.

TrustMark should require a transparent schedule identifying who will assess, approve, pay for, supervise, certify and guarantee each stage. A consumer should not discover only after extraction that the house has been left thermally worse off and that no responsible party has accepted the reinstatement cost.

Simply funding the removal or replacement of the original measure may not always achieve that.

For example, specialist extraction may reveal defects, debris, obstructions or other conditions which could not reasonably have been fully established while insulation remained within the cavity.

Equally, where an intervention itself requires disturbance of parts of the property, appropriate reinstatement may form part of the necessary remedial process.

The technical scope should therefore be sufficiently flexible to reflect what is actually discovered rather than being artificially constrained by a predetermined schedule which no longer reflects the condition of the property.

There must, of course, be appropriate controls around additional work and cost.

That is another reason why evidence during remediation and technical monitoring are important.

They allow an unexpected condition to be recorded, assessed and, where justified, incorporated into the remedial decision rather than relying solely upon retrospective assertions from either the consumer or contractor.

The remedy should not end with payment

OSCAR also believes financial protection should be connected to verification of the outcome.

A consumer-protection system should not regard a case as successfully resolved merely because money has been paid or a contractor has attended the property.

The relevant question is:

Has the problem which justified the intervention actually been appropriately resolved?

Where remedial work is funded through a guarantee, insurance arrangement or other financial protection mechanism, appropriate completion evidence should be produced and the status of the measure and property record updated accordingly.

This links financial protection directly to the evidence lifecycle discussed earlier in this response.

Mandatory Cavity Clearance Certification and Building-Fabric Suitability Before Reinstallation

OSCAR believes that where cavity wall insulation has been removed, no replacement insulation should be considered until satisfactory extraction and clearance have been independently verified and certified, and the building has separately been assessed as suitable for the proposed insulation system.

Stage 1 — Extraction, clearance and certification

Following extraction, an appropriately competent and independent verifier should assess whether the existing insulation, debris, obstructions and contamination have been satisfactorily removed. The assessment should record any defects revealed, the extent and limitations of inspection, and supporting photographic or borescope evidence. A formal Cavity Wall Insulation Extraction and Clearance Certificate should be issued following satisfactory verification. A contractor's self-declaration alone should not constitute independent proof of clearance.

Stage 2 — External building-fabric suitability

Clearance certification must not automatically authorise reinstallation. A separate assessment should establish whether the external building envelope is weather-tight and resistant to water penetration, and whether the proposed insulation system is appropriate to the construction and exposure. This must include external masonry, pointing, render, cracks, openings, windows, doors, sills, flashings, roof junctions, ground levels, drainage, existing dampness and exposure to wind-driven rain.

Rainwater goods require specific attention. Gutters, downpipes, hoppers, outlets, joints and discharge arrangements must be in satisfactory condition and function effectively. Leaks, blockages, inadequate discharge and other defects that may permit water penetration or compromise insulation performance must be rectified and verified before reinstallation.

Stage 3 — Evidence-based authorisation and completion

Only after certified cavity clearance, correction of relevant building-fabric and rainwater-goods defects, and a positive suitability assessment should replacement cavity wall insulation be considered. The decision should be documented against applicable standards and insulation-system requirements, with installation by competent operatives and appropriate completion verification and guarantee arrangements.

The required sequence is: Extraction → Independent clearance verification → Clearance certificate → Building-fabric and rainwater-goods assessment → Necessary repairs → Authorisation to reinstall → Competent installation → Completion verification.

A clear cavity is not necessarily a suitable cavity. Nor does a satisfactory extraction certificate demonstrate that the building is ready to receive replacement insulation.

20. What happens when the original installer is no longer there?

This is an important test of any long-term consumer-protection framework.

Energy-efficiency measures may remain within properties for decades.

The business which originally installed a measure may not.

Companies cease trading. Businesses become insolvent. Ownership changes. Individuals retire. Businesses may leave schemes or lose certification. Records can become difficult to obtain.

None of those events changes the physical condition of the consumer's home.

A consumer-protection framework which works effectively only while the original installer remains available and willing to participate will inevitably leave gaps.

OSCAR therefore welcomes the emphasis upon stronger financial protection, but believes the revised framework should clearly establish who takes ownership of the consumer journey where the original Registered Business cannot reasonably do so.

The consumer should not be expected to investigate company structures, insolvency arrangements, insurance policies, guarantees and scheme responsibilities simply to discover whether somebody will inspect their home.

Where the original business has ceased trading or is otherwise unavailable, the single-point-of-contact principle becomes particularly important.

TrustMark should be capable of identifying the relevant protection arrangements, retrieving the available property and installation records and progressing the matter towards appropriate technical assessment.

The original installer should not be the only source of evidence

This also reinforces the importance of an enduring central evidence record.

If the only meaningful technical records are retained by the original contractor, the disappearance of that contractor can mean the disappearance of important evidence.

Where appropriate information has been recorded within the TrustMark system throughout the lifecycle of the work, the evidence can survive the business which created it.

That could include the original assessment, specification, installation evidence, identities and competencies of relevant operatives, photographs, commissioning information, technical monitoring and subsequent interventions.

The consumer-protection value of such information may not become apparent until many years after the original work was undertaken.

Records should survive changes in the market

This is one reason OSCAR believes the Data Warehouse should increasingly be considered an enduring property record rather than simply an installation register.

Businesses come and go.

Scheme structures can change.

Certification arrangements can change.

Government program's can change.

But the property remains.

The technical history associated with significant interventions to that property should therefore be capable of surviving those changes.

21. Remediation should require the right competence

Where investigation establishes that remedial work is necessary, another important question arises:

Who should be permitted to undertake it?

There can be an understandable tendency within consumer-redress arrangements to return a complaint to the original contractor and provide that business with an opportunity to rectify its work.

In many circumstances that will be entirely reasonable.

A contractor should not automatically be deprived of the opportunity to correct a genuine defect simply because a complaint has arisen.

However, that principle should not be absolute.

There will be circumstances where the relationship between the consumer and contractor has broken down, where the original contractor no longer exists, where repeated remedial attempts have failed or where the remediation required involves a specialist activity outside the contractor's demonstrated competence.

In those circumstances, simply returning the work to the original business may not provide the consumer with an effective remedy.

This becomes particularly important where remediation involves something materially different from the original installation activity.

Installation and removal are different competencies

Cavity wall insulation provides a useful example.

Competence to install cavity wall insulation should not automatically be treated as evidence of competence to extract and clear it.

Extraction presents different technical challenges.

The operative may encounter contaminated or degraded material, cavity obstructions, debris, building defects, services and areas of insulation which cannot be adequately assessed until work is underway.

The work also requires a means of determining whether the cavity has actually been satisfactorily cleared.

This is why OSCAR was involved in developing separate vocational pathways for Cavity Wall Insulation Surveying & Inspection and Cavity Wall Insulation Extraction & Clearance, rather than assuming that competence in one activity automatically established competence in another.

The same principle should apply across the revised TrustMark framework.

Remediation should be undertaken by people competent in the remediation actually required, not simply by somebody associated with the original measure.

Consumers should not be forced back to a contractor in every circumstance

OSCAR believes there should therefore be circumstances in which an alternative appropriately competent contractor can be appointed.

Those circumstances might include where the original business:

has ceased trading;

is no longer appropriately registered or certified;

does not possess the specialist competence required for the remedial activity;

has previously attempted remediation which has demonstrably failed;

is unable or unwilling to undertake the required work within a reasonable period; or

where there are other sufficiently serious circumstances which make returning the consumer to that business inappropriate.

That decision should itself be evidence-led and proportionate.

A disagreement between a homeowner and contractor should not automatically disqualify the contractor from undertaking remedial work.

But neither should the consumer-protection framework operate on the assumption that the original contractor must always be the organisation which provides the remedy.

Remediation requires independent verification

Where substantial remedial work is undertaken following a consumer complaint, OSCAR believes consideration should also be given to whether completion should be independently verified.

The contractor undertaking the remediation can and should produce its own evidence of the work.

But in appropriate cases, particularly where the work follows a serious technical failure or disputed complaint, there is value in separating:

the organisation which undertakes the remedy, from, the organisation or competent person which confirms that the required outcome has been achieved.

That does not mean every minor remedial item requires another full independent survey.

The level of verification should be proportionate to the nature and seriousness of the problem.

But where a consumer has already travelled through a lengthy complaint and technical investigation, the final outcome should provide confidence that the problem has actually been resolved rather than simply recording that remedial work has been attempted.

The result should then feed back into the enduring property record.

In this way, the consumer journey has a defined conclusion:

the problem is investigated, the appropriate remedy is identified, the work is undertaken by appropriately competent people, the outcome is verified and the property record is updated.

That, in OSCAR's view, is what meaningful redress should ultimately achieve.

22. Independence, conflicts of interest and transparency

Independent review beyond TrustMark and the dispute-resolution provider

TrustMark should publish the governance, appointment, funding, conflict-management and appeal arrangements of any dispute-resolution body, including the Dispute Resolution Ombudsman where engaged. The fact that a body describes itself as independent should not prevent a consumer from testing its actual independence through transparent published safeguards. OSCAR does not allege that a specific body lacks independence as an established fact.

Where evidence indicates possible unfair commercial practices, misleading representations or other consumer-protection breaches, there should be a defined route to Trading Standards through the appropriate reporting and referral channels. Technical dispute resolution, statutory enforcement and legal adjudication are different functions; each should be accessible without TrustMark marking its own homework.

If TrustMark is to take greater ownership of consumer complaints and redress, the independence of the technical evidence upon which decisions are based becomes increasingly important.

OSCAR does not believe independence necessarily requires every organisation involved in a complaint to be entirely disconnected from the original work.

The original installer will often hold valuable information. Scheme Providers and Certification Bodies will have legitimate roles within the process. Guarantee providers and insurers may have responsibilities which require them to investigate a claim.

However, where there is a genuine dispute about whether work is defective, what has caused a problem or what remediation is required, the consumer must have confidence that the technical determination has not been unduly influenced by the organisations whose work, certification or financial liability may itself be under consideration.

The principle should be straightforward:

The greater the potential conflict of interest, the greater the need for demonstrable independence in the technical determination.

Who instructs the expert matters

Independence is not simply a question of whether the person inspecting the property works for the original contractor.

The way in which an expert or specialist is instructed can also influence the usefulness of the resulting assessment.

What questions were they asked?

What evidence were they provided with?

Were they given the consumer's evidence as well as the industry's records?

Were relevant photographs, installation documents and previous reports made available?

Were they asked to establish causation, compliance, condition, remediation requirements or merely to comment upon a limited technical issue?

These distinctions matter.

An inspection can be competently undertaken but still fail to resolve the dispute if the person carrying it out has not been asked the questions which actually need answering.

This reflects the experience described earlier in this response. Different technical questions require different competencies, and commissioning an inspection alone does not necessarily produce a resolution.

The scope of an independent inspection should be visible

Where TrustMark commissions or relies upon an independent technical assessment as part of a complaint, OSCAR believes the consumer should normally understand the scope of that assessment.

That does not require every internal communication or commercially sensitive document to be disclosed.

But the consumer should be able to understand:

what the specialist was asked to determine;

what information and evidence was considered;

what areas of the property were examined;

what limitations affected the investigation;

what findings were made; and

what conclusions were reached from those findings.

Where significant evidence supplied by the consumer has not been considered, there should be a mechanism for identifying that before a final determination is made.

Factual accuracy should be capable of correction

There is also an important distinction between allowing a consumer to influence an expert's opinion and allowing a consumer to correct factual information.

A homeowner should not be able to rewrite an independent technical conclusion simply because they disagree with it.

But if a report contains a factual error - for example, an incorrect installation date, construction type, description of previous works or sequence of events - there should be an opportunity for that factual issue to be identified and, where appropriate, corrected.

The technical opinion should remain the expert's.

The underlying facts upon which that opinion relies should nevertheless be as accurate as reasonably possible.

Technical evidence should lead to a determination

OSCAR is particularly concerned that independent assessment should not become another procedural stage which generates a report but no clear outcome.

A consumer may already have accumulated correspondence, surveys, photographs, complaints and technical opinions.

Adding another report to that collection only assists if somebody is then responsible for determining what the evidence means and what happens next.

This is one of the lessons OSCAR draws from the consumer experiences described earlier in this response. A complaints process can contain correspondence, inspections, referrals and reviews without necessarily returning the consumer's home to an appropriate condition.

The revised TrustMark model should therefore connect technical assessment to decision and decision to action.

Where an investigation concludes that no defect attributable to the measure has been established, that conclusion should be clearly explained.

Where further investigation is necessary, the next technical question should be identified.

Where a defect is established, the required remediation should be determined.

Where responsibility is established, the appropriate redress mechanism should then be engaged.

And where remedial work is completed, the outcome should be appropriately verified and the property record updated.

Transparency protects businesses as well as consumers

These safeguards should not be viewed solely as mechanisms for challenging installers or other industry participants.

A transparent, evidence-led process also protects reputable businesses from unsupported allegations.

A complaint does not establish a defect.

Damp does not automatically establish insulation failure.

An allegation of non-compliance does not establish non-compliance.

An independent investigation may ultimately demonstrate that the installed measure is not responsible for the problem being experienced.

That conclusion is equally important and should carry appropriate weight.

A properly structured independent process therefore protects both sides.

It provides consumers with a credible means of establishing genuine failures while giving competent businesses a mechanism through which unsupported allegations can be tested against evidence rather than simply repeated.

23. The consumer should not have to become the case manager

One of the clearest lessons from difficult consumer cases is the extraordinary amount of work which can fall upon the homeowner.

Consumers can find themselves collecting installation records, chasing different organisations, obtaining technical reports, comparing conflicting opinions, maintaining timelines, preserving photographs, researching standards, identifying insurance arrangements and attempting to establish which organisation is responsible for the next step.

In complex cases, the consumer can effectively become the case manager of their own failure of consumer protection.

That should not be necessary.

The second anonymised homeowner case provides an example of this problem: the consumer had to reconstruct information, obtain records, coordinate organisations, commission evidence and ultimately prepare for litigation.

OSCAR believes TrustMark's proposed single-point-of-contact model provides an opportunity to change this.

Someone must own the case

Once a complaint reaches an appropriate threshold for formal investigation, there should be clarity about who is responsible for progressing it.

That organisation should not necessarily undertake every technical function itself.

But somebody needs to own the journey.

Mandatory named handlers and immutable event history

Each complaint should have a unique reference, a named accountable 'case owner' and a tamper-evident, chronological audit trail. Every receipt, telephone call, document, photograph, evidence review, instruction, decision, transfer, deadline, missed deadline, escalation, manager intervention, remediation authorisation and closure should be individually timestamped.

For each intervention, the record should identify the full name, role and organisation of the person involved; the evidence considered; the instruction or decision; its reasons; the person authorising it; and the next action owner. Changes of case owner must record who transferred the file, who accepted it and when. Historical entries must never be silently overwritten: corrections require versioned, attributable entries.

Consumers should be given appropriate access to their case history and decisions, subject to lawful confidentiality and personal-data safeguards. Independent reviewers and relevant authorities must be able to reconstruct the sequence without relying upon a retrospective organisational summary.

That means identifying what information is required, obtaining the relevant records, determining what technical questions need answering, arranging access to the appropriate expertise, communicating the outcome and ensuring that agreed actions are progressed.

The consumer will naturally have responsibilities too.

They may need to provide access, documents, photographs or other information within their possession. They should engage reasonably with investigations and remediation.

But they should not be expected to understand and coordinate the machinery of the retrofit industry themselves.

As stated earlier in this response:

The industry created that complexity. The consumer did not.

There should be visibility of progress

A consumer should also be able to understand where their case currently sits.

OSCAR believes there may be value in providing a relatively simple case-status system through which the consumer can see, for example, that:

the complaint has been received;

records are being obtained;
 technical assessment is required;
 an inspection has been arranged;
 technical findings are under review;
 a decision has been reached;
 remediation has been authorised;
 remediation is underway;
 completion is awaiting verification; or
 the matter has been closed.

This need not expose every internal process.

It simply provides visibility.

For a homeowner living with a serious property problem, uncertainty itself can become a significant part of the experience.

Knowing who owns the case, what is currently happening and what the next stage will be would represent a meaningful improvement.

Cases involving serious living conditions need escalation

Not every complaint carries the same level of urgency.

Some will concern relatively minor defects or administrative matters.

Others may involve substantial damp, mold, loss of heating performance, water ingress, electrical concerns, structural issues or circumstances in which parts of the home cannot reasonably be occupied.

The revised system should therefore be capable of identifying cases requiring accelerated attention.

OSCAR is not suggesting that every allegation of serious conditions should automatically be accepted at face value.

Again, the approach should remain evidence-led.

But there should be an effective triage mechanism capable of distinguishing an ordinary complaint from circumstances where delay itself may materially increase damage, cost or risk to the household.

The first anonymised homeowner case is particularly relevant to that principle. OSCAR's concern is not simply that a complaint existed, but that a family could remain displaced while multiple organisations and processes existed around the problem.

A stronger system should therefore ask at an early stage:

Is the property currently safe and reasonably habitable?

Is the problem continuing to cause damage?

Could delay materially worsen the position?

Are there circumstances requiring urgent interim action while the full technical investigation continues?

That does not predetermine liability.

It recognises that consumer protection sometimes requires the immediate problem and the ultimate question of responsibility to be considered on different timescales.

24. Consumer protection should increasingly prevent complaints, not simply process them

Much of the consultation understandably concerns what happens when something has already gone wrong.

OSCAR believes the greater opportunity is to use the revised framework to reduce the number of serious complaints which arise in the first place.

That requires the system to learn from the evidence it collects.

If the same defect repeatedly appears;

if particular property characteristics repeatedly correlate with poor outcomes;

if certain measures repeatedly require remediation;

if particular technical details produce disproportionate complaints;

or if the same deficiencies are repeatedly identified during onsite audits,

that information should feed back into standards, training, competency assessment, auditing and future installation decisions.

This is where the combination of a stronger Data Warehouse, onsite auditing, technical evidence and complaint information could become particularly powerful.

The complaints system should not sit separately from quality assurance.

Every properly investigated failure is also an opportunity to prevent another one.

That returns us to the central proposition with which OSCAR began this response:

Consumer protection should not begin when a complaint is made. It should begin with competence, full and appropriate assessment and before-works evidence, continue throughout the work, be fully recorded on completion and remain available if something subsequently goes wrong.

The proposed reforms provide an opportunity to connect those stages.

That, in OSCAR's view, would represent a much more significant improvement than simply creating a better complaints process.

It would begin to create a system which learns from failure and uses that knowledge to prevent recurrence.

24A. Funding-neutral consumer protection: ECO, grants and privately paid work

OSCAR asks TrustMark to identify a published baseline of competence, honest pre-contract information, record keeping, quality assurance, complaint handling and redress applying to the relevant work of a TrustMark Registered Business irrespective of whether the customer pays privately or the work is supported by ECO or another grant. Funding-specific protections may legitimately differ; such differences must not be confused with permission to deliver inferior work or obscure the consumer's statutory rights.

A Registered Business should disclose in writing, before contract acceptance, whether an installation guarantee is included, its provider, duration, scope, exclusions and transferability, and whether a funding or scheme route affects that protection. Registration itself must not be presented as equivalent to a particular guarantee or as assurance that every service falls within the registered scope.

Anonymised recent enquiry: a private-pay CWI installation and missing guarantee

In October 2026 OSCAR received an enquiry from a professional engineer and landlord who reported privately paying a substantial TrustMark Registered Business to install CWI to improve the EPC position of a let property. The EPC documentation referred both to “Cavity wall, filled cavity – Average” and “Cavity wall, as built, no insulation (assumed) – Poor”, descriptions whose precise relationship to the treated walls requires verification.

When selling the property, the owner’s conveyancing solicitor requested a 25-year guarantee. The customer reported that no such guarantee had been provided or its absence explained before the work, and that the installer later advised that a guarantee could not be issued retrospectively. OSCAR was asked for a CWI Condition Inspection Survey to reassure a buyer. OSCAR explained that a limited-scope inspection records evidence observed at the time; it cannot retrospectively provide an installation guarantee or certify the condition of every concealed part of the cavity.

This is an anonymised, unverified customer account, not a finding of misconduct. It nevertheless raises a precise consultation question: what must a TrustMark Registered Business disclose about guarantees before a privately funded CWI installation, and what remedy is available where material information was omitted? No general legal requirement for a 25-year guarantee is assumed without checking the applicable contract and scheme rules.

24B. Proactive identification: Find, Assess, Fix and Verify

Industry commentary has suggested that very large numbers of homes may contain failed or at-risk cavity wall insulation. Such estimates must be attributed to their source, dated, and separated into confirmed defects, suspected problems and properties merely assessed as at risk. OSCAR does not treat an unverified “millions” estimate as a proven count of failed installations.

If the scale is substantial, a purely complaint-driven model is inadequate. TrustMark should work with scheme providers, guarantee bodies, housing providers and competent independent surveyors on a risk-based national program: FIND potentially affected properties using installation and complaint data; ASSESS the building and the measure using proportionate competent investigation; FIX confirmed defects using a documented technically justified remedy; and VERIFY completion and update an enduring property-level record.

The program should publish risk criteria, participation routes, protections against unnecessary extraction, responsibilities for costs, independent audit results and measurable outcomes. It should learn from repeat defects and not simply wait for another homeowner to discover a problem during sale or after years of damp.

24C. Housing safety, financial loss and legal consequences

The consequences can include building damage, mold and damp exposure, loss of thermal performance, higher energy expenditure, reduced marketability, survey and conveyancing costs, temporary accommodation and litigation. Each claimed loss must be supported by evidence of causation and amount; it must not automatically be attributed to CWI.

In England, the Homes (Fitness for Human Habitation) Act 2018 framework, through the Landlord and Tenant Act 1985, provides enforceable fitness obligations for relevant private and social tenancies. Awaab’s Law began applying to specified significant damp-and-mold and emergency hazards in social housing on 27 October 2025; further phased requirements are scheduled. These duties principally concern landlords and do not automatically establish liability for an installer, guarantee provider or TrustMark. Nevertheless, they increase the importance of prompt investigation, clear responsibility and verified remediation.

Two historical documents have now been identified for consideration: Max A. Krangle’s 2018 test expert energy-loss report and Erica Bedford of Kings Chambers’ advice dated 14 June 2018 concerning expert energy reports in

cavity wall insulation claims. The former illustrates methods of modelling potential lost savings and additional heating demand; the latter discusses potential evidential and legal distinctions. Neither is proof that every defective installation increases bills or that a particular loss is legally recoverable.

TrustMark should explain how it will use the evidence it already holds to prevent avoidable harm, rather than only adjudicate complaints after losses have accumulated.

24D. Long-term guarantee providers: financial resilience, claims oversight and consumer access

The adequacy of consumer protection must be examined over the lifetime of the guarantee, not only at the point when a certificate is issued. Cavity wall insulation is a particularly important example because the Cavity Insulation Guarantee Agency (CIGA) has historically been associated with approximately 6.2 million guarantees. This is a cumulative historical figure, not an assertion that 6.2 million guarantees remain live, enforceable or exposed to claims today.

The financial exposure must be measurable and independently tested. A sensitivity calculation illustrates the potential scale of long-term guarantee liabilities. CIGA has historically issued approximately 6.2 million guarantees. Using an illustrative average successful claim cost of £2,500, a successful claim rate equivalent to just 1% of those historically issued guarantees would represent 62,000 claims and £155 million in gross costs. At 2%, the exposure would increase to £310 million; at 5%, £775 million; and at 10%, approximately £1.55 billion.

These calculations are illustrative financial stress-test scenarios, not forecasts of actual claim incidence, entitlement or future liabilities. They do not establish how many guarantees remain valid, how many installations are defective, or how many claims would succeed. Nevertheless, they demonstrate why the financial resilience of organisations issuing long-term guarantees must be subject to meaningful independent examination.

Importantly, the illustrative £2,500 claim cost is intended to represent a relatively modest allowance for cavity wall insulation extraction. It does not necessarily include consequential property damage, enabling works, reinstatement of insulation, internal repairs, temporary accommodation or other costs that may arise from a defective installation. The total cost of restoring a property could therefore be substantially greater. A proper assessment of CIGA's financial position must establish the number of live guarantees, their remaining durations, the frequency and success rates of claims, applicable policy limits, available cash and investments, technical provisions, liabilities, actuarial assumptions, insurance or other financial backing, and projected cash flow under adverse scenarios.

Companies House records identify company number 03044131, formerly The Cavity Insulation Guarantee Agency, as having changed its name to The Installation Assurance Authority Group on 9 December 2025. OSCAR calls for independently verified disclosure of which legal entities and financial resources support the outstanding historical guarantees, together with transparent reporting of claims, liabilities, decisions and full independent oversight.

Guarantee claims: who supervises decisions and outcomes?

A guarantee system should disclose, at least annually, the number of guarantees in force, new claims, accepted claims, rejected claims, cases withdrawn, appeals, reversals, payments and completed remedial works; median and longest processing times; common grounds for refusal; and the proportion of remedies independently verified as successful. Aggregated publication must protect personal data while allowing independent scrutiny of patterns.

OSCAR asks who appoints and pays claim assessors, who reviews contested technical findings, who authorises rejection, who audits conflicts of interest, who assesses repeat defects and who hears an appeal that

challenges the guarantee provider itself. Every claim should have a named owner and a timestamped decision trail, as proposed in Section 23. Trading Standards and other relevant statutory bodies should receive referrals where the evidence indicates potential consumer-law breaches, without being misrepresented as an automatic individual claims ombudsman.

Certificate access, ownership information and charges

OSCAR is concerned by reports that homeowners seeking copies of CIGA certificates for conveyancing have faced charges. Publicly reported CIGA responses have referred to a £48 duplicate-certificate fee in January 2025 and £60 in June 2026. The user-reported £50 plus VAT amount is consistent with £60 including VAT, but the current tariff, its legal basis and its scope should be verified directly with the provider. The assertion that names have been removed from certificates also requires documentary verification before being presented as a systematic practice.

Even where a charge for a formally certified duplicate is contractually permissible, consumers should be able to establish without disproportionate cost whether a guarantee exists for their property, which legal entity stands behind it, its commencement and expiry dates, and the broad extent of its protection. OSCAR asks for a published cost justification for duplicate charges, accessible correction of inaccurate certificate records, and a clear process when a property is sold or names change.

OSCAR does not assert, without evidence, that certificate charges were introduced to replenish inadequate reserves or that the provider is unable to meet claims. Instead, those concerns make financial transparency and independent examination especially important.

Guarantees must be assessed against the complete consumer remedy

Where a claim is upheld, payment for extraction alone may not restore the property. Consequential building damage, necessary enabling works, reinstatement and any appropriate replacement insulation must be assessed, with clear identification of which elements are contractually covered, which may fall under other legal remedies and who bears any uncovered costs. Guarantee wording and the facts of each case must be examined rather than assuming universal coverage or exclusion.

The consultation should ask TrustMark to explain how long-term guarantee providers are approved, reviewed, stress-tested and held accountable, and what contingency exists where a provider restructures or fails. An independent annual assurance report would give consumers, installers, housing providers and policymakers a firmer basis for confidence.

Questions requiring a published response

What independent body verifies the financial capacity of guarantee providers to meet the projected cost of outstanding obligations?

What claim volumes and average remedial costs are assumed in financial stress testing?

Who independently audits technical decisions and overturned claims?

Who has authority to review or challenge the provider's own complaint handling?

Can consumers obtain free basic confirmation of guarantee status and property coverage?

What guarantees remain enforceable following corporate changes?

24E. Unnecessary funded works, potential fraud and ECO funding integrity

TrustMark's revised framework must address not only defective workmanship but the possibility that publicly supported measures were never technically justified. Where existing satisfactory cavity wall insulation is removed and replaced, the central questions are why removal was necessary, who approved it, what was represented to the funder and whether the claim complied with the rules applicable at the time. Eligibility for support does not, by itself, establish technical necessity; equally, replacement may sometimes be permissible under the relevant scheme rules even without a failed installation. The specific rules and contemporaneous evidence must be examined before wrongdoing is concluded.

A serious case referred by OSCAR

OSCAR's experience in an anonymised homeowner case raises this issue. According to the account and information available to OSCAR, the homeowner initially sought loft insulation rather than cavity wall insulation replacement. The attending contractor subsequently described a proposed "upgrade" to the existing CWI. OSCAR's assessment was that the original insulation was sound and had more than ten years of its guarantee remaining. Nevertheless, it was extracted and new CWI installed.

OSCAR understood an ECO-funded figure of approximately £9,600 to be associated with the work. The precise claimed amount, payment recipient, measure-level allocation and funding basis require confirmation against original scheme records; this figure must not be assumed to represent proven profit or a verified payment to any named contractor. Serious property problems followed the works. OSCAR also identified confusion concerning the guarantee being issued in a different company's name from the business understood to have undertaken the installation. Distinct contracting, installation and guarantee entities can be legitimate, but their roles and liabilities must be transparent and verifiable.

OSCAR raised concerns with TrustMark and other stakeholders and referred its suspicions about the funding circumstances to the Serious Fraud Office. Referral is not a finding that fraud occurred, that any authority opened an investigation, or that any named person or business acted dishonestly. OSCAR's concern remains that the original diagnosis, replacement rationale, authorisation and funding declarations should be independently examined.

Reports of a possible repeatable commercial model

OSCAR has also been told by others that certain businesses may have operated a model of attributing failure to existing CWI irrespective of its true condition, thereby generating extraction and replacement work. These are reports received by OSCAR, not independently verified findings or proof of a sector-wide practice. Their seriousness lies in the possibility that commercial incentives could encourage misdescription of the existing installation, especially where the assessor or associated parties benefit financially from the recommended intervention.

An honestly mistaken assessment and deliberate misrepresentation are different matters. Both may lead to unnecessary work, but suspected deliberate misrepresentation requires a separate funding-integrity and enforcement response. A high extraction volume alone proves neither misconduct nor fraud. Patterns should trigger scrutiny of underlying evidence, not automatic condemnation.

Independent assessment before evidence is destroyed

Extraction can remove the very material needed to determine whether the original installation was defective. Where substantial funded replacement is proposed, the pre-work condition, survey findings, borescope evidence, photographs, limitations and technical rationale should therefore be preserved before removal.

Particular risk indicators include insulation still within its guarantee period, work not initially sought by the consumer, an unexplained change in scope, repeated failure diagnoses by commercially linked assessors and installers, or discrepancies between original findings and subsequent funding submissions.

TrustMark should require an auditable record identifying the consumer's original request, existing measure and guarantee, diagnostic evidence, authorising parties, informed consent, applicable funding rules, original and replacement systems, assessors and operatives, legal entities undertaking and claiming for the work, claimed sums and basis of calculation, guarantee responsibilities and independent verification of the outcome.

Retrospective analysis and escalation

Working within its proper remit and lawful data-sharing arrangements, TrustMark should collaborate with Scheme Providers, obligated suppliers, the relevant ECO administrators and enforcement authorities to examine credible patterns of potentially unnecessary extraction and refill. Risk-based analysis could consider unusually high failure-diagnosis rates, repeated removals of apparently serviceable guaranteed insulation, missing pre-work evidence, related-party assessment and remediation arrangements, anomalous claim values and recurring guarantee or installer-identity discrepancies.

TrustMark should publish procedures for preserving records and escalating reasonable suspicions of dishonest claims or misleading commercial practices to the competent authority. Such referrals should be evidence-led and should not prejudice criminal liability.

OSCAR recommends that every significant funded intervention be tested against four questions: Was it technically justified? Was it properly authorised and eligible under the applicable funding rules? Was it undertaken by demonstrably competent people? Was the outcome independently evidenced and the consumer left with appropriate protection? A system that checks only that the work was completed may miss work that should never have been undertaken.

24F. EPC records, assumed cavity wall insulation and basic building-fabric risk observations

OSCAR believes TrustMark should address the limitations of Energy Performance Certificates (EPCs) when determining whether cavity wall insulation is present, absent or performing satisfactorily. An EPC is an energy assessment produced using an approved methodology; it is not necessarily a physical inspection or technical condition survey of the cavity.

Where insulation cannot be verified, EPC methodology may require assessors to use assumptions based on the property's age, construction and available evidence. The distinction between a recorded installation, an assumed construction characteristic and physically verified insulation is important.

An EPC recording a filled cavity should not, by itself, be treated as conclusive evidence that insulation is present throughout the cavity, correctly installed, free from defects or performing satisfactorily. Equally, an EPC assumption that a cavity is uninsulated should not be treated as proof that no insulation exists.

Such assumptions may influence EPC grades, property transactions, retrofit decisions, rental compliance, funding eligibility and the homeowner's understanding of what is inside the walls. A property could be recommended for insulation works based on an assumed absence of insulation without adequate investigation of what is already installed.

Basic external risk observations by Domestic Energy Assessors

OSCAR recommends that the relevant EPC standards and assessment procedures be reviewed so that Domestic Energy Assessors (DEAs) undertake and record basic visual observations of external building-fabric risks relevant to cavity wall insulation, where safely accessible and visible. This should include:

- Brickwork and pointing: obvious deterioration, open mortar joints, cracked or damaged brickwork and other visible potential routes for rain penetration.
- Damp-proof course (DPC): whether a continuous, suitably positioned DPC is visibly identifiable and whether apparent bridging by raised ground levels, paving, render or other materials is present. Where continuity cannot be verified, that limitation should be recorded rather than assumed away.
- Rainwater goods: the apparent condition of gutters, downpipes, hoppers, outlets and drainage, including visible leakage, overflow, staining, defective connections or discharge against the wall.
- External finishes: cracked render, defective cladding, failed coatings and other visible conditions that may affect resistance to wind-driven rain.
- Openings and junctions: obvious defects around windows, doors, sills, flashings and other vulnerable external junctions.
- Moisture indicators: visible staining, persistent wetting, deterioration or other signs warranting further investigation.
- Exposure and construction: readily apparent characteristics that may increase moisture risk or indicate a need for specialist assessment.

A basic risk flag, not a specialist CWI survey

These observations should be straightforward, non-invasive and undertaken within the limits of the assessor's competence and safe access. A DEA should not be expected to diagnose concealed cavity defects, undertake invasive inspections or certify that a building is suitable for cavity wall insulation.

OSCAR proposes a standardised CWI-related risk observation distinguishing: (1) no obvious external risk indicators observed within the visual inspection scope; (2) visible defects or risk indicators identified; and (3) unable to assess adequately because of access, visibility or other limitations. An absence of obvious defects must not be represented as certification of cavity or building-fabric suitability.

Where obvious external defects or potential moisture risks are identified, the assessor should record them, bring them to the homeowner's attention and recommend appropriate specialist investigation where necessary. In particular, an EPC recommendation for cavity wall insulation should not override the need for a proper pre-installation suitability assessment.

Training, evidence and referral

OSCAR recommends that basic building-fabric and CWI risk awareness form part of the relevant DEA training and continuing professional development requirements, including recognition of defective pointing, deteriorated masonry, bridged or inadequately visible DPC arrangements, defective rainwater goods and indications of moisture ingress. The purpose is early identification and referral, not an extension into specialist diagnosis.

Where an EPC assumption is contradicted by verified site evidence, the discrepancy should be documented and referred for appropriate review or correction through the relevant EPC processes. Verified installation, extraction, clearance and building-fabric assessment records should, where lawful and technically feasible, contribute to the property's ongoing technical history.

TrustMark does not itself control the national EPC assessment methodology. OSCAR therefore recommends that TrustMark work with Government, the relevant EPC methodology authorities, accreditation schemes and retrofit stakeholders on appropriate changes, while separately requiring adequate physical verification before TrustMark-registered insulation work proceeds.

An EPC describes an assessed energy characteristic. It should not be mistaken for a certificate confirming the actual condition, completeness or quality of cavity wall insulation. Nor should an EPC assessor be expected to certify cavity suitability; nevertheless, obvious building defects should not be ignored when an EPC may influence a decision to install insulation.

24G. Energy efficiency can be lost — or reversed

Cavity wall insulation is installed to reduce heat loss, improve thermal efficiency and lower heating demand. Where installation is incomplete, poorly distributed, displaced, damaged, degraded or moisture-affected, the expected benefit may be reduced or absent. The distinction between failing to save energy and actively worsening a building's thermal performance is critical.

First, significant gaps and voids can leave the home consuming more heating energy than would have been required after a competent, successful installation. This is the loss of anticipated savings; it does not necessarily mean the dwelling performs worse than before insulation.

Second, under adverse circumstances, insulation defects associated with moisture ingress, wet building fabric, thermal bridges or other deterioration may contribute to increased heat transfer and heating demand compared with the building's earlier condition. This opposite outcome is possible, but requires property-specific evidence and careful comparison of the appropriate baseline; neither wet insulation nor visible mould alone establishes a quantified energy penalty.

TrustMark should distinguish modelled EPC savings from achieved performance and require independent assessment where there is credible evidence of adverse thermal performance. Where remedial action is authorised, its scope should address underlying water ingress and building-fabric defects, not merely remove the insulation. Post-remediation verification should test whether the intended thermal outcome has been restored.

At programme level, unachieved or reversed savings also raise a legitimate question about the accuracy of aggregate energy and carbon benefits attributed to installations. This calls for proportionate longitudinal performance evaluation rather than assuming every lodged measure delivers its projected savings throughout its service life.

24H. Non-traditional construction: two enquiries received on 22 October 2026

OSCAR received two enquiries on 22 October 2026 illustrating the risks of applying standard cavity-insulation assumptions to non-traditional construction. These are homeowner-reported circumstances, not findings that either installation was defective or inappropriate. They are representative of the wider enquiries OSCAR receives concerning timber-frame, steel-frame, concrete and other non-standard properties.

Case A — Leicester: a homeowner described a 1950s former local-authority dwelling believed to be Laing Easi-Form cast in-situ concrete construction, reportedly retrofitted with CWI in the late 1980s. Cold walls and draughts were reported. The correct first step is to verify the actual wall system, cavity configuration and

applicable BBA or other system certification before drawing conclusions about the insulation or proposing a standard CWI inspection or remedy.

Case B — Huntingdon: a homeowner described a post-war steel-framed semi-detached dwelling reportedly containing 1980s expanding foam insulation and sought extraction and independent cavity-clearance certification. Moisture and concealed steel corrosion may require specialist structural investigation. A cavity-clearance certificate records the clearance scope and observed result; it cannot certify the condition of concealed structural steel.

Neither of these two enquiries concerns a property identified as timber-framed. Their relevance is the broader category of construction-specific risks that conventional insulation workflows can miss. Non-traditional construction does not automatically prohibit insulation; suitability depends on the verified construction, design, product approval, exposure and condition.

Who picks up the pieces when the installer has disappeared, guarantees have expired or the original technical design cannot be found? Why should the homeowner be expected to discover the risk, pay for specialist investigation and coordinate remediation alone? TrustMark should publish an accessible triage and referral pathway, including clear boundaries between cavity inspection, specialist building-fabric assessment and structural engineering.

OSCAR recommends a proactive, risk-based historic-stock review using EPC information alongside ECO/CERT/CESP and other installation records, guarantee registers, housing-provider records and verified construction-type data where lawfully available. EPC entries can be useful screening indicators but are not conclusive evidence of the structural system, installation suitability or current CWI condition. A risk flag must trigger proportionate verification, not automatic extraction.

Historic installations dating from the 1980s predate today's TrustMark scheme arrangements. OSCAR does not attribute original responsibility for those works to TrustMark. The question is whether TrustMark, government and relevant sector bodies will now help identify inherited risks, share information, establish competent routes to investigation and avoid leaving affected households without assistance.

24I. Energy-loss evidence and appropriate consumer redress

Max A. Krangle's 2018 test report explores two distinct possibilities: anticipated savings that were not achieved and additional heating demand associated with adverse thermal conditions. Its calculations are illustrative and dependent on assumptions and underlying survey evidence; they are not direct measurements of a particular household's bills.

Advice by Erica Bedford of Kings Chambers dated 14 June 2018 considers expert energy-loss evidence in CWI disputes. It should be read as advice on the circumstances and instructions supplied, not as a judicial finding or an automatic entitlement to compensation.

OSCAR asks TrustMark to ensure consumer-redress assessments do not stop automatically at the price of extraction. Where properly evidenced and causally linked to defective work, the assessment should consider the full technical remedy, reinstatement, consequential building damage, and demonstrable energy-performance detriment. Safeguards should prevent speculative calculations and double recovery.

24J. The environmental cost of failed insulation: extraction, waste and whole-life impacts

The purpose of publicly supported energy-efficiency measures is to reduce energy demand and environmental harm. When cavity wall insulation is wrongly specified, incorrectly installed, damaged or fails in service, the environmental consequences may extend beyond lost heating-energy savings. Extraction can generate substantial volumes of waste insulation, alongside transport emissions, treatment or disposal impacts, additional materials and further construction work.

A material being recyclable in principle is not evidence that insulation recovered from a failed domestic cavity installation is actually recycled. In OSCAR Onsite's experience, extracted mineral wool is handled as a controlled waste stream and taken by appropriately registered carriers to authorised waste facilities, with landfill a practical disposal destination. The final route must be evidenced for each consignment; an initial waste transfer note does not, by itself, demonstrate recycling. Waste classification and the receiving facility's permit or exemption must be appropriate to the actual material and contamination.

Manufacturer information demonstrates the gap between recyclability and practical take-back. ROCKWOOL UK's Rockcycle brochure accepts specified clean, dry, unused ROCKWOOL UK stone wool and installation offcuts but excludes used material from renovation and demolition and wet or contaminated material. Knauf Insulation UK states that it does not currently accept waste mineral wool, identifying low bulk density, separation of glass and rock wool, and contamination as barriers. ISOVER UK states that it does not currently offer a customer recycling service. These statements do not establish that no UK recycler exists, but they do not demonstrate an available route for wet, degraded or contaminated mineral wool extracted from domestic cavities.

Claims about high recycled content in new mineral wool, including recycled glass bottles, should not be presented as proof of recycling extracted cavity insulation. TrustMark should seek independently verifiable evidence of actual end destinations, including the facility, material accepted, tonnage, processing route and proportion ultimately recovered or landfilled. The frequently cited figure of millions of insulated homes illustrates the potential scale, not the number of failures. As a scenario only, 1% of 15 million dwellings would represent 150,000 extractions; actual quantities require verified installation numbers, failure and extraction rates, and material-specific weights.

OSCAR recommends that extraction and independent clearance records retain waste carrier details, waste description and classification, transfer notes, receiving-facility details, and, where obtainable, evidence of final treatment or disposal. Whole-life environmental assessment should consider the original embodied impacts, foregone or reversed energy savings, extraction and transport, disposal and replacement, avoiding double counting. An energy-efficiency programme cannot be judged solely by installation counts and projected savings without considering the consequences when measures fail.

Evidence references for section 24J (manufacturer-published information; accessed 24 October 2026):

ROCKWOOL UK, "What is Rockcycle?" UK recycling brochure: <https://www.rockwool.com/siteassets/rw-uk/downloads/brochures/rockwool-uk-recycling-brochure.pdf>

Knauf Insulation UK, "Insulation – Frequently Asked Questions", waste mineral wool take-back: <https://knauf.com/en-GB/our-services/knauf-insulation/faq>

ISOVER UK, "Do you recycle leftover insulation?": <https://www.isover.co.uk/resource-learning/faqs/do-you-recycle-leftover-insulation>

24K. OSCAR Onsite, industry concerns and TrustMark registration governance

OSCAR Onsite's director was introduced in detail to the energy-efficiency sector around 2018 through discussions with its founder and Chartered Surveyors firm Llewellyn Smith, both of whom, according to the director's account, had concerns about installation quality and the state of the industry and were interested in claims arising from defective work. The director's previous experience as Managing Director of a Ministry of Justice-regulated claims management company formed part of the context for those discussions. These are OSCAR's recollections and should not be interpreted as statements on behalf of the named individuals.

In correspondence understood to date from around 25 April 2023, TrustMark raised concerns with a Scheme Provider about OSCAR's business model, website wording, an insurance-related matter and alleged conflicts of interest and sought suspension or removal under relevant scheme procedures. OSCAR reports that TrustMark had also sought details of OSCAR-registered cavity wall insulation extraction firms, some of which did not wish their information to be supplied. Whether that disagreement influenced any registration decision has not been established.

OSCAR also reports that a subsequent subject access request to TrustMark resulted in a disclosure that OSCAR estimated to be approximately 90% redacted. Redactions may have lawful grounds; the proportion alone does not prove a breach. The substantive issue is whether an affected person can understand the personal data processed, the basis for material allegations, and the applicable review process.

Prior regulated claims-management experience, common directorship or participation in several related activities may give rise to matters requiring assessment, but do not alone demonstrate an actual unmanaged conflict of interest. Any adverse registration decision should identify the precise published requirement, evidence of breach, opportunity to respond, proportionality of action and access to independent appeal.

TrustMark should nevertheless be able to demonstrate that decisions are free from inappropriate external influence and that independent technical criticism does not itself prejudice eligibility.

25. OSCAR recommendations to TrustMark

The proposals within the consultation provide an opportunity to connect competence, property assessment, installation, evidence, monitoring, complaints, independent investigation, remediation, financial protection and the enduring property record within a more coherent framework. OSCAR recommends that TrustMark consider the following practical measures.

25.1 One clear route, with clear case ownership

Provide consumers with a clearly identifiable route into the system and retain ownership of the journey once a complaint reaches formal investigation. The consumer should not have to decide which part of the industry architecture must act next.

25.2 Early triage and proportionate escalation

Assess the nature and urgency of the problem early, including whether the property is reasonably habitable, whether damage is continuing and whether delay could materially worsen the position. Triage should prioritise action without predetermining liability.

25.3 Establish the technical facts before deciding the remedy

Start with the property and the evidence. Identify what is actually wrong, whether the installed measure is responsible and what intervention is technically justified before determining redress or funding.

25.4 Match competence to the technical question

Identify the question first and then the competence required to answer it. Distinguish installation, diagnosis, building pathology, specialist remediation, extraction, monitoring and verification rather than assuming one qualification or profession covers every stage.

25.5 Maintain access to genuinely independent specialist assessment

Use an external network of appropriately competent specialists where necessary. Independence should be considered alongside competence, scope of instruction and access to the relevant evidence.

25.6 Create a proportionate independent technical review route

Allow a focused review where there are reasonable grounds such as credible contrary evidence, material factual error, significant evidence not considered, new evidence or a reasonable concern regarding competence or independence. This should be a safeguard, not an unlimited sequence of second opinions.

25.7 Recognise credible evidence commissioned outside TrustMark

Independent evidence obtained by a consumer should be capable of formal consideration where it is produced by an appropriately competent specialist and supported by relevant evidence. If a material conclusion is rejected, the reason should be explained.

25.8 Make the Data Warehouse an enduring property record

Record the lifecycle of the measure, not only its installation. Where appropriate, the record should be capable of showing investigation, confirmed defect, remediation, removal, replacement and verified completion, supported by evidence.

25.9 Connect the business, competent individual and actual work

Record, where proportionate, both the responsible business and the competent individuals undertaking specialist activities. Use onsite auditing to examine actual work as a complementary layer of assurance rather than treating company registration or qualification as proof that every job is correct.

25.10 Connect financial protection to the evidenced technical remedy

Financial protection should fund the remedy established by the technical evidence, including justified reinstatement or additional work identified during remediation, rather than allowing the structure of the financial product to dictate the technical solution.

25.11 Require appropriate competence and proportionate verification for remediation

Remediation should be undertaken by people competent in the remedial activity. Alternative contractors should be available where the original business is unavailable, unsuitable or lacks the necessary specialist competence. Significant remediation should be independently verified where proportionate before closure.

25.12 Learn systematically from failure

Use complaint, audit, remediation and verification data to identify recurring defects, property risks, methods or other patterns. The purpose should be not only to resolve today's complaint but to reduce the likelihood of the same failure occurring elsewhere.

25.13 Publish funding-neutral minimum consumer protections

Set out the baseline duties for relevant work by Registered Businesses, distinguishing statutory rights, TrustMark registration requirements and additional ECO/grant conditions; require pre-contract disclosure of guarantees and limitations.

25.14 Require complete named and timestamped complaint audit trails

Record every handler, intervention, senior instruction, evidence review, decision, handover and closure in a tamper-evident, accessible case record.

25.15 Provide independent oversight and statutory referral routes

Publish dispute-provider independence safeguards and an independent challenge mechanism; refer potential consumer-law breaches to the appropriate Trading Standards route without presenting it as an individual ombudsman.

25.16 Clarify CWI partial-remediation approvals and guarantees

Identify the exact approved technical basis, mixed-material compatibility, measurement and verification method, guarantee scope and liability for any proposed top-up or partial repair.

25.17 Assess the full financial and technical remedy

Distinguish extraction from consequential damage, enabling works, reinstatement and suitable replacement CWI; identify funding and responsible parties for each stage.

25.18 Launch a risk-based Find, Assess, Fix and Verify program

Use complaints, installation histories, property risks and audits to identify potentially defective measures proactively, investigate proportionately and record verified outcomes.

25.19 Link housing-safety escalation to complaint handling

Flag possible uninhabitable conditions and serious damp or mold for urgent assessment and appropriate landlord, regulator and other referrals without predetermining liability.

25.20 Require independent financial assurance of guarantee providers

Publish the legal entity responsible for every guarantee scheme, its live guarantee exposure, independent actuarial or equivalent liability assessment, financial stress tests, available backing and contingency arrangements, with proportionate external audit.

25.21 Require transparent and independently reviewable guarantee claims

Require standard annual reporting of claim outcomes, reasons for rejection, appeals, independent technical review, processing times and verified remedies, supported by named case ownership and immutable event records.

25.22 Guarantee documentation should remain accessible

Require a straightforward, low-barrier method for consumers and conveyancers acting with authority to verify whether a guarantee exists, its duration, provider and basic scope. Publish and justify any fee for certified duplicates and provide correction procedures.

25.23 Recognise distinct specialist competence in installation and extraction

Acknowledge the distinction recorded in the Westminster Hall debate of 21 February 2024 and ensure technical accreditation, inspection, extraction and verification are matched to the actual occupation and risk rather than presumed from a generic company registration.

25.24 Audit Registered Business advertising and accreditation scope

Require verified, service-specific marketing and logo claims, including periodic website reviews, correction records and independent escalation where Scheme Providers fail to act.

25.25 Independently verify training and practical competence pathways

Publish trade-specific minimum competence requirements and scrutinise training providers, assessment methods, assessor capability, certificate authenticity and continuing operative competence.

25.26 Protect ECO funding against unnecessary interventions and misrepresentation

Preserve pre-work evidence and funding decision trails; use risk-based analysis to identify questionable extraction and replacement patterns, investigate proportionately and refer credible suspected dishonesty to the appropriate authorities.

25.27 Require certified cavity clearance and building-fabric suitability before replacement insulation

Require independent verification and certification of satisfactory cavity wall insulation extraction and clearance before any replacement insulation is considered. Separately verify that the external building envelope is weather-tight and resistant to water penetration, including satisfactory masonry, pointing, render, openings, roof junctions, gutters, downpipes and effective rainwater drainage. Require necessary defects to be remedied before reinstallation is authorised, subject to applicable technical standards, insulation-system suitability, competent installation and completion verification.

25.28 Improve EPC evidence standards and introduce basic building-fabric risk observations by Domestic Energy Assessors

Distinguish EPC assumptions from physically verified cavity wall insulation evidence. Work with the relevant EPC authorities and accreditation schemes to introduce proportionate, non-invasive external building-fabric risk observations by DEAs, including visible brickwork and pointing defects, DPC visibility and bridging, rainwater goods and moisture risks; require clear limitations, homeowner warnings and specialist referral where appropriate. Such observations must not replace specialist cavity assessment or pre-installation suitability verification.

25.29 Assess achieved energy performance, not merely installed measures

Require risk-based evidence of thermal performance and differentiate foregone projected savings from demonstrated additional heating demand.

25.30 Review historic CWI in non-traditional construction

Use linked data for risk screening, verify actual construction, provide competent specialist referral routes and protect households from unjustified extraction.

25.31 Account for inherited legacy risks

Define who triages, investigates, pays and verifies where historic installers, records or guarantees are unavailable, without retrospectively attributing 1980s work to TrustMark.

25.32 Record the waste and carbon consequences of failed insulation

Require auditable records of extracted insulation type, estimated mass or volume, waste classification, registered carrier, transfer documentation, authorised receiving facility and, where evidenced, ultimate recycling, recovery or landfill. Commission an independent assessment of UK recycling routes for post-installation cavity insulation, distinguishing clean factory offcuts from wet, degraded or contaminated extraction waste; include whole-life environmental impacts of failure.

25.33 Strengthen transparency in registration decisions and information requests

Publish clear requirements for disclosure of registered firms' information, objective conflict-of-interest assessment, reasons for suspension or removal, proportionate remediation opportunities and independent appeals.

26. An opportunity to test the model in practice

OSCAR recognises that implementing changes of this scale across the whole home-improvement and retrofit landscape will not be straightforward.

Different measures present different risks.

Different technologies require different competencies.

Different property types create different technical challenges.

For that reason, there may be value in testing elements of the proposed approach within defined specialist areas before attempting to apply every aspect universally.

Cavity wall insulation could provide one such opportunity.

It is an established energy-efficiency measure with a substantial historic installed base. There are established installation standards and guarantee arrangements, but also a recognised need for specialist inspection, diagnosis, extraction, clearance and remediation where problems arise.

It therefore provides an environment in which several of the principles discussed within this response could be tested together:

specialist occupational competence;

independent condition inspection;

evidence before intervention;

evidence during specialist remediation;

technical monitoring;

clearance and completion verification;

consumer access to records;

and updating the status of a measure following remediation or extraction.

OSCAR has practical experience across each of those areas.

We would therefore welcome the opportunity to engage with TrustMark, Scheme Providers, Certification Bodies and other appropriate stakeholders to explore whether elements of this model could be tested through a limited specialist pilot.

The purpose would not be to establish OSCAR as the sole technical solution for cavity wall insulation.

Nor would it be appropriate for a consultation response to suggest that.

The purpose would be to test whether the principles advocated within this response can operate effectively in real properties with real evidence and real interventions.

A pilot could examine questions such as:

Can evidence requirements be made sufficiently robust without becoming administratively excessive?

Can individual occupational competence be connected effectively to the property record?

Can independent inspection distinguish between CWI failure and unrelated building defects?

Can technical monitoring provide useful assurance during extraction?

Can completion be meaningfully verified?

Can a historic installation record be appropriately updated where insulation has subsequently been removed?

Can the resulting information be presented to the consumer in a form which is understandable and useful?

And can that evidence subsequently assist TrustMark, Scheme Providers, guarantee providers and other parties if another issue arises?

These are practical questions.

OSCAR believes they are best answered through practical testing.

The organisation's development has itself followed that approach: identifying shortcomings encountered within real cases, developing practical mechanisms intended to address them and continuing to refine those mechanisms through experience.

We would be pleased to contribute that experience to any appropriate further discussion arising from this consultation.

27. Conclusion

OSCAR welcomes TrustMark's willingness to reconsider how consumers are protected when undertaking home improvements and energy-efficiency works. We support the direction of travel: a simpler route for consumers, clearer responsibility, stronger financial protection, better use of data and greater examination of actual work.

The success of those reforms will, however, depend on what sits behind the simpler consumer journey. Simplicity at the front of the system must be supported by technical rigour behind it.

A single point of contact cannot replace specialist competence. Registration of a business cannot replace competence of the individual. A lodged installation cannot demonstrate its continuing performance. A complaint cannot establish a defect. An inspection cannot resolve a dispute if the wrong questions are asked. A technical report cannot protect a consumer if nobody acts upon its findings. Financial protection cannot determine the correct technical remedy. Remediation cannot be assumed successful simply because work has taken place. And a historic property record cannot remain reliable if it does not change when the physical property changes.

The experience which led to OSCAR's development has repeatedly returned us to the same principle: establish the evidence first. That principle influenced our work examining CWI claims, the development of specialist occupational competence, our approach to independent condition inspection, and our current work on technical monitoring, extraction verification and the enduring evidence trail.

Consumer protection should therefore begin before the consumer has a complaint. It begins with understanding the existing property. It continues through appropriate design and specification. It requires competent businesses and competent individuals. It requires evidence of what actually happens at the property. And where something subsequently goes wrong, that evidence must remain available to a system capable of taking ownership of the problem and accessing the specialist competence required to resolve it.

There can be one clear door for the consumer without pretending there is one competence behind it. There can be a central point of contact without creating a central point of failure. There can be an initial technical determination while preserving a proportionate route to independent challenge. There can be stronger financial protection while ensuring that technical evidence determines the remedy. And there can be a Data Warehouse which records not simply what was installed, but what subsequently happened to the property.

If those principles are connected, the result can be considerably more than an improved complaints system. It can become a genuine lifecycle model of consumer protection: one which seeks to prevent problems where possible, identifies them properly when they occur, provides a route to appropriate remediation, verifies the outcome, learns from what went wrong and leaves behind an enduring evidence record for the consumer and the property.

One clear door.

The right competence behind it.

Independent challenge where necessary.

Evidence throughout.

A record which follows the property.

OSCAR Onsite submits this response constructively and would welcome further engagement with TrustMark, Scheme Providers, Certification Bodies and other stakeholders. In particular, we would be willing to explore whether cavity wall insulation could provide a practical specialist environment in which elements of the proposed lifecycle model are tested in real properties, with real evidence and real interventions.

The objective should be a system that works better for everyone acting properly within it: consumers, competent contractors, Scheme Providers, Certification Bodies, guarantee providers and TrustMark itself. A system capable of identifying genuine failures and putting them right, while equally capable of establishing when an allegation is not supported by the technical evidence.

Good evidence protects the consumer. Good evidence protects the competent contractor. And good evidence gives TrustMark the foundation upon which fair decisions can be made.

Alan Hoey
Managing Director
OSCAR Onsite Ltd

Evidence notes and consultation context — updated 24 October 2026

TrustMark, “Building stronger protection for home improvement customers”, consultation published 22 September 2026, response deadline 27 October 2026: <https://www.trustmark.org.uk/pages/trustmark-consultation/>

TrustMark, Proposed Scheme Changes FAQs, updated 30 September 2026: <https://www.trustmark.org.uk/pages/trustmark-consultation/proposed-scheme-changes-frequently-asked-questions/>

DESNZ, Reforming Consumer Protection for Home Upgrade Schemes, published 17 June 2026: <https://www.gov.uk/government/consultations/reforming-consumer-protection-for-home-upgrade-schemes>

Max A. Krangle, Cavity Wall Insulation Failure – Energy Report, test expert report (2018), user-supplied supporting material. Figures are illustrative, not verified household meter data. <https://oscaronsite.co.uk/trustmark-consultation-2026>

Erica Bedford, Kings Chambers, In the Matter of Expert Energy Reports in Cavity Wall Insulation Claims, 14 June 2018, user-supplied supporting material. Legal advice, not a court judgment. <https://oscaronsite.co.uk/trustmark-consultation-2026>

Two anonymised homeowner enquiries received by OSCAR on 22 October 2026: reported construction and insulation details require independent verification. No conclusion of installer wrongdoing is asserted.