



Home safe

Giving consumers confidence to install low carbon technologies

Executive summary

Most people who install low carbon technologies see genuine benefits and would recommend them to others. However, trust in net zero technologies is at risk of being damaged by the actions of rogue traders and poor quality installations. For the minority of consumers affected, these experiences can be devastating, and have a major knock-on effect, since people rely on friends and family as a major source of advice when looking into new technologies. Without action, consumer confidence could be undermined at a critical point, and put our net zero goals at risk.

Government can put an end to this, and ensure the long-term success of the net zero transition, by improving consumer protections and cracking down on rogue traders. This will give consumers confidence to engage with new technologies and prevent future scandals which could turn net zero into a political headache.

To achieve this, we want to make the consumer protections regime as simple as possible, and extend protections to all consumers who purchase net zero technologies. As well as longer term reforms that make consumer protections fit for the future, we have also identified a number of shorter-term measures that can improve outcomes for consumers in the here and now.

Recommendations

- 1 Government should create a single quality scheme that accredits all installers in this market.** It should also ensure that all consumers can easily access redress.
- 2 More resource is needed to ensure all consumers can access independent advice about their consumer rights.** This should include dedicated support to help consumers in vulnerable circumstances navigate the complaints process, equivalent to the Extra Help Unit's role with energy companies
In the next year:
- 3 All standards bodies should be required to follow the CMA's best practice guidance for the sector**
- 4 Boost incentives for installers to become accredited**
Government should:
 - Remove bottlenecks to the uptake of Government grants like ECO4 and GBISEnergy suppliers and financial institutions should:
 - Ensure products and services are offered through accredited installers

Introduction

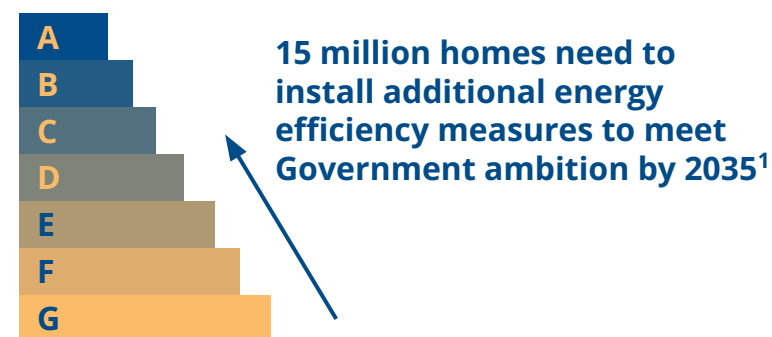
The UK's net zero commitments will require all consumers to make changes to their homes. 15 million homes will need to install insulation in order to meet the Government ambition of all homes being EPC C by 2035,¹ and all households will have to move away from heating their homes with fossil fuels. By 2028, Government is aiming for 600,000 heat pumps to be installed each year - an 11-fold increase on the number that were installed in 2021.² Achieving these targets will be no easy feat. Alongside policies to provide consumers with financial support and good quality advice, we also need to rapidly increase trust in technologies that are unfamiliar to many consumers today.

In 2021, we highlighted how a complicated consumer protections regime stops consumers from having the confidence to install net zero technologies in our report [The Net Zero Protections Puzzle](#).³ Two years later, this report looks at what has changed, and what action needs to be taken to make consumer protections fit for the long term.

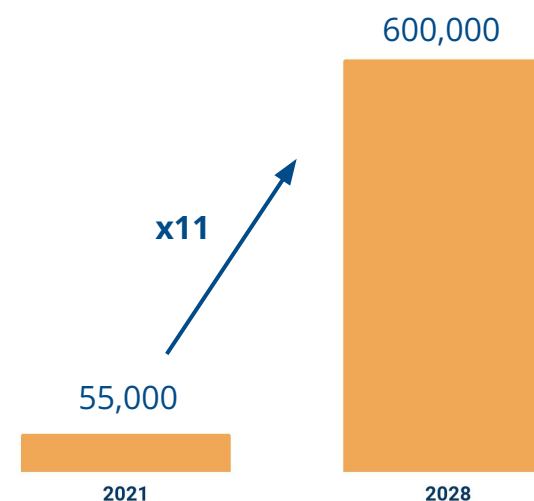
We've gathered new evidence to understand how the consumer experience has developed including:

- analysis of contacts to our [consumer service](#) to understand in detail the types of problems people encounter.
- interviews with a range of expert stakeholders across the sector to consider how these problems might be addressed.
- polling by YouGov to assess the customer journey for those households in England and Wales who had looked into installing a range of low carbon technologies.

The net zero challenge



Annual heat pump installations need to increase 11-fold by 2028 to meet targets²



People need to be given confidence to install low carbon technologies

Low carbon technologies can deliver significant benefits for people, including lower bills, greater comfort, and improved health and wellbeing.⁴ This is demonstrated in our polling: almost 9 in 10 people who installed low carbon technologies in their homes in the last year would recommend them to a friend.⁵

But too many people are still put off installing them. Making changes to your house can be scary and it can often feel like a big risk for households to take. As an example, only 36% of people who had looked into installing cavity wall insulation in the last year had actually completed the process.⁶ Over half of people hadn't appointed an installer, of which 33% said they were still looking to do so in future.⁷

When we asked people why they hadn't completed the installation, a range of different factors got in the way. 22% of people who hadn't had work done felt like the quote they received was not good value. 14% of people found the process too complicated. And 13% of people struggled to find an installer in the first place.⁸

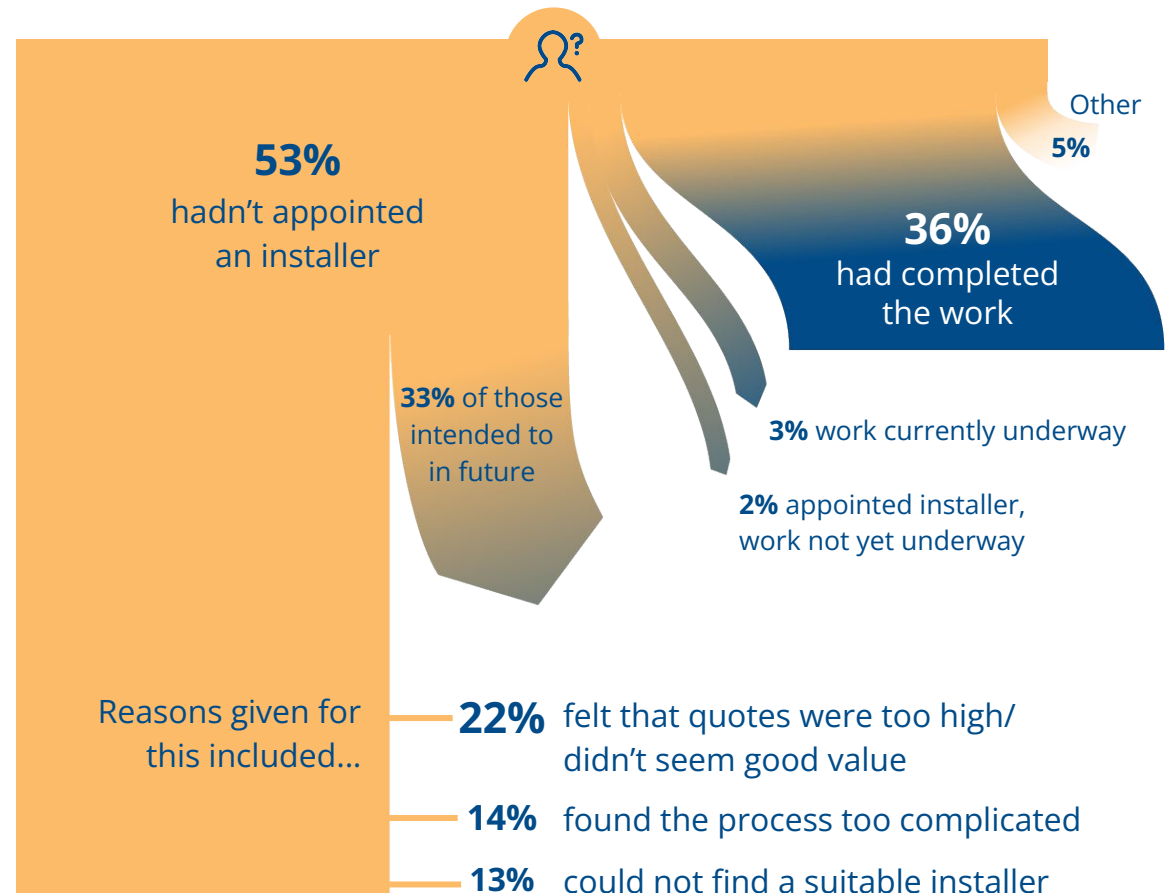
As well as financial support, consumers need to be given more confidence in order to engage with this market. This should be seen as a key enabler for meeting the UK's net zero targets.

Of households who installed low carbon technologies in their homes...



88% **would recommend** them to a friend

Of homeowners who looked into cavity wall insulation in the last year...



Rogue traders are undermining the net zero transition

Unfortunately, the actions of some installers are weakening consumer confidence. Households told us that they were worried about falling foul of rogue traders when looking into low carbon technologies. The process of installing these technologies is unfamiliar to most households, and so they are more worried than normal about being taken advantage of.⁹

And a bad experience for one consumer can put off lots of other people from installing low carbon home technologies. This is because people rely on their friends and family for advice. In fact, behind speaking with tradespeople, it's the second most common source of advice for households that install low carbon technologies.¹⁰

"...Spoke to a company who seemed really dodgy - it really put me off and made me see what a minefield the market is."

Survey respondent when asked why they hadn't gone through with installing solar PV in their home¹¹



of consumers rely on information from their friends and family when considering installing low carbon home technologies.¹²

"I found it hard to find someone I was sure would do the work well... My mum had this problem twice with two different companies and I don't want to end up with the same problem."

Survey respondent when asked why they hadn't gone through with installing cavity wall insulation in their home¹³

Consumers have been exploited amid high energy prices

High energy prices have caused a spike in consumers' interest in ways to lower their energy bills. As an example, there were almost as many solar PV installations in 2022 as in the previous three years combined.¹⁴

Unfortunately, some consumers have been let down by poor quality installations, or exploited by scammers. Through contacts to our consumer service helpline, we see firsthand how households have fallen foul of poor practice when making net zero home improvements. This has left consumers thousands of pounds out of pocket at the worst time imaginable. Exploiting consumer interest in this way will undermine confidence in the transition, and must not be allowed to happen.

Spray foam mis-selling

If installed incorrectly, spray foam insulation can cause damage to the structure of roofs and lead to damp.¹⁵ This can result in difficulty selling or remortgaging the property. We have seen a rise in cases of pressure-selling and poor quality installation of spray foam insulation, which have particularly taken advantage of vulnerable consumers looking to reduce their energy bills.

Because it can be difficult to inspect whether spray foam insulation is leading to damp, lenders will sometimes refuse to provide a mortgage unless the work was carried out by an accredited installer. We have also seen instances where firms have charged unacceptable amounts in order to remove spray foam insulation.

Green Energy Together

As part of a local authority-backed scheme to help households install solar PV, consumers paid for work to be carried out by an installer called Green Energy Together. Despite being an accredited installer, the company demonstrated increasingly poor quality installations, and took money from hundreds of customers without completing work.¹⁶

Since then, Green Energy Together has filed for insolvency, and many consumers have been unable to recover their deposits.¹⁷ Insolvency documents indicate that Green Energy Together owed consumers close to a million pounds in uncompleted work.¹⁸

Micah*, 62, Kent

Micah received a cold call over the phone and was persuaded to let a trader carry out a survey of his loft. After inspecting the loft, the trader claimed to have detected dangerous gases which needed to be fixed urgently. Micah agreed to let them install some spray foam insulation a few days later. The trader had told him that this would help his wife's breathing problems, and increase the value of his home. Micah has since found out that the spray foam means he can no longer sell his property.

Gaps in consumer protections have allowed this to happen

Over recent years we have called out the gaps in consumer protections that allow poor practice to take place, and make it hard for consumers to seek redress. And we haven't been alone. In 2015, the Government commissioned the Each Home Counts review, which looked at the state of consumer protections and quality assurance in this sector.¹⁹ It recommended that a single quality mark be established for the retrofit and home renewables sector. In response to this, there has been some progress made, including the remit of Trustmark expanding to cover government schemes like the Energy Company Obligation (ECO).

Despite this, in 2021 our Net Zero Protections Puzzle report found there is still a complicated patchwork of different schemes for consumers to navigate if something goes wrong.²⁰

Earlier this year, the Competition and Markets Authority (CMA) concluded that the consumer protections landscape is still too complex for consumers.²¹ It set out actions for the UK Government to consider in order to improve this.

We welcome proactive changes from bodies like MCS in response to these findings.²² But overall progress so far has been too slow. As the net zero transition picks up pace Government must urgently make consumer protections fit for the future.

2016

Each Home Counts Review

Finds that the myriad of different schemes operating in the sector is confusing for consumers. Recommends that a new quality mark be established for all energy efficiency and renewable energy measures

2020

Trustmark* expanded

Becomes a requirement for installers to be registered with Trustmark to carry out work for Government retrofit schemes

2021

Citizens Advice: Net Zero Protections Puzzle

Finds that confusing consumer protections are failing consumers, and calls for Government action to simplify protections and plug gaps

2023

MCS* announces scheme redevelopment

2023

CMA call for evidence on consumer protections for green heating and insulation

Highlights that the standards landscape is still complex and gaps remain, suggests Government should consider a holistic review of protections in this market

* Trustmark and MCS are two major quality assurance schemes. More information can be found on the following page.

Consumer protections today

A lot of different organisations make up the consumer protections landscape today. We make reference to some of them later in the report, and this page gives a short overview of what they do.²³

Manufacturers will often provide product warranties for technologies like heat pumps or solar PV. This can provide cover to a consumer in the event that there is a fault with the product itself. They do not extend to instances where the product has been installed incorrectly.

Trustmark TrustMark is a not-for-profit Government endorsed quality scheme for home improvements and retrofit. It's a requirement of the Energy Company Obligation (ECO) and Home Upgrade Grant (HUG) that work is carried out by a TrustMark registered business. Installations have to comply with PAS technical standards as well as the scheme's requirements for trading practices and customer service.

PAS 2030/35 are technical standards for home retrofit. It's a requirement that installations carried out under ECO, HUG, or the Great British Insulation Scheme (GBIS) comply with PAS2030/35.

Consumer codes are member organisations designed to raise customer standards in the low carbon home improvements sector. It's currently a requirement that MCS certified installers are a member of a consumer code, but this is subject to change. Some codes are also licensed to act as scheme providers for the Trustmark quality scheme.

Certification bodies are a collection of organisations that are accredited to ensure technical compliance with either the MCS or PAS 2035/2030 technical standards on behalf of MCS and Trustmark. They currently carry out the bulk of on-site monitoring and enforcement on behalf of Trustmark and MCS. Some also provide additional consumer protections and benefits to their members.

MCS is a certification scheme for low-carbon technologies. They set technical installation standards for a range of low-carbon technologies (not including insulation). It's a requirement of the Boiler Upgrade Scheme (BUS) and Smart Export Guarantee (SEG) that installers are MCS certified. To be MCS certified, installers have to be a member of a consumer code and offer insurance, but this is currently under review.

Insurance providers provide products that cover instances where the installer ceases to trade. This can include deposit protection insurance, or an insurance-backed guarantee (IBG). IBGs last for a number of years and are meant to ensure that a customer can still benefit from an installer's workmanship guarantee even if an installer ceases to trade.

So what's wrong with protections today?

Consumers in the 'able-to-pay' sector can have little to no protections

Installers do not have to be accredited, unless they are carrying out work that is funded by government grants.²⁴ This leaves the door open for rogue traders to take advantage of consumers who are paying out of their own pocket. There is no guarantee that work will be carried out to a decent standard, and if something does go wrong it's difficult for the consumer to get the problem put right. Consumers can also be vulnerable to misleading sales practices.²⁵

Although purchases can still be covered under consumer protection law²⁶, this isn't good enough on its own, since consumers may end up having to go to court to resolve a problem. This is a very time-consuming, intimidating and potentially costly process that many people struggle to engage with. If someone is left without heating, or an installation has caused damage to a property, then problems need to be put right as soon as possible.

Using an accredited installer gives consumers additional help to resolve problems. In the first instance this would mean being able to raise a complaint about an installer to the accreditation scheme or code they belong to. If that doesn't resolve the problem, then a consumer will often have access to Alternative Dispute Resolution (ADR) - this helps to resolve the problem without having to go to court.

We're worried about the amount of unaccredited installers that operate in this market. This has arisen in part due to limited uptake of government grants - meaning that the additional business opportunities provided by accreditation aren't as big as they could be. Since joining an accreditation scheme costs money and comes with additional checks, some installers currently decide it isn't worthwhile to get accredited. On top of this, we're aware of one supplier who has stopped requiring that solar PV installations are certified by MCS in order to access their solar tariffs.²⁷



Paola*, 78, Liverpool

Paola is an older woman who lives alone. She was approached by a trader who persuaded her she could save money on her energy bills by spraying a coating on her walls. The trader charged £6000 and carried out the work straight away, without giving Paola a cooling-off period.

Later that month, the same trader came back to recommend further work be carried out in Paola's roof. Although she initially asked them to leave, the trader tried to pressure her to have work carried out because they had travelled a long way. Paola told us she felt intimidated and ended up paying a further £2000 deposit. After speaking with family, she tried to get the deposit back but the trader won't return her calls.

* All names have been changed to protect clients' identities

The patchwork of existing schemes and certification bodies is difficult to navigate

Installers of low carbon home technologies carrying out work using government grants must be accredited. This provides their customers with enhanced protections, but even these fall short too often.

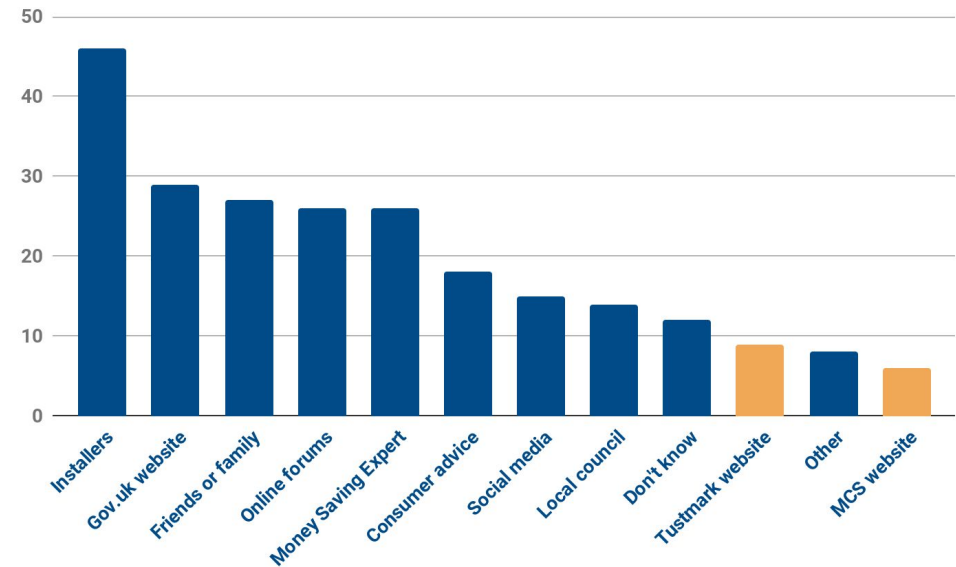
A myriad of accreditation schemes, consumer codes and certification bodies operate in the sector, and this can negatively affect consumers. If something goes wrong they can be passed from one body to another to try and resolve the problem.

Consumers are often left having to diagnose for themselves what the cause of any problem might be, in order to make the case to the relevant body that they should receive their help to resolve the problem.²⁸

But more broadly, the sheer number of different schemes mean consumers can be confused about the level of protection they have, and are unaware of the benefits of these schemes. Competition between so many different bodies is not helpful in this instance, and can lead to inconsistencies and poor practice.

It also means that consumers may not be seeing the benefit in having work carried out by an accredited installer. When we asked people where they looked for information when installing heat pumps, major accreditation schemes like Trustmark and MCS were some of the least common sources.²⁹ This finding was repeated across all the low carbon technologies we included in our polling.

Sources of advice for people installing heat pumps in the last year. Trustmark and MCS are not well known.³⁰



Nathan*, 45, Liverpool

Nathan had a heat pump installed but later discovered that the system wasn't fitted correctly. He complained to the installer's consumer code, who recommended that the complaint should instead be taken up with their certification scheme. The certification scheme recommended that they should complain first to the installer's trade association, but they aren't responding. Nathan doesn't know what to do. At the time of contacting us it had been a year since he had the heat pump installed.

* All names have been changed to protect clients' identities

Inadequate financial protections can leave consumers out of pocket

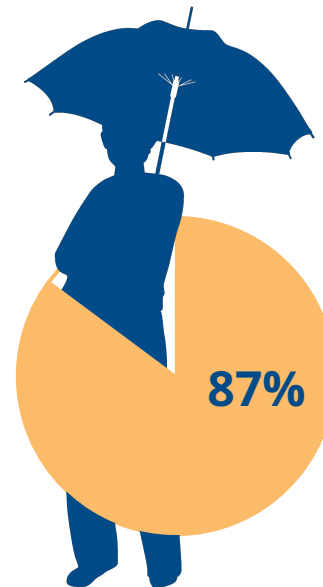
Many accredited installers provide insurance that is supposed to financially protect their customers if they cease to trade. This can include deposit protection insurance, or products that insure the workmanship guarantee that the installer provides customers with. We're concerned that the current range of insurance products in this sector isn't providing adequate cover to consumers, due to specific caveats included within them. For example, deposit protection insurance can be time-limited to within 60-120 days of when the deposit was paid, which doesn't always cover consumers until their installation date.³¹ These caveats are often not made clear to consumers, who are then unable to successfully claim if something goes wrong. For this reason, they can provide consumers with a false sense of security.

The recommendations in this report do not seek to address this issue, as we feel more clarity is needed before the best alternative solution can be identified. We plan to conduct dedicated research into this in the next year, and will provide a more detailed overview once it concludes.



Rochelle*, 45, Kent

Rochelle was interested in installing a battery storage system in her home. She paid a 25% deposit via bank transfer, and was told that her deposit would be insured. On receiving the insurance papers from the insurance provider, she noticed that her cover expired before the date the installer was supposed to have completed the works. She asked the provider for the cover to be extended, but was told that the terms should have been explained to her. The installer has stopped answering her calls and hasn't carried out the installation on the promised date. Rochelle thinks they never intended to carry out the installation, and is not sure how she can get her money back.



of homeowners we surveyed said that **stronger financial protections** would make them feel more confident when installing low carbon technologies in their homes³²

* All names have been changed to protect clients' identities

Protections fit for the net zero transition

In the years ahead, we will be move beyond early adoption of low carbon technologies as growing numbers of households make changes for net zero. We don't want to see a rise in installations to be matched with a rise in consumer detriment: **protections need to be fit for the long term.** The findings of the CMA and others set out a strong case for Government to look at longer term reforms to protections in this market.

We need a consumer protection regime that is fit for the transition to net zero by building trust and ensuring the market delivers for consumers and industry. We have developed an ambitious package of long-term recommendations which can help achieve this.

However, with an increasing number of low carbon technologies being installed, it's also important to improve consumer outcomes today. We lay out a range of short term measures that can be implemented quickly, at low cost and with maximum benefit. This combined approach will ensure better outcomes for consumers and industry while longer-term reforms are being implemented.

How the consumer journey could look



Government action is needed, especially to protect consumers in the able-to-pay sector

As we laid out in our 'Net Zero Protections Puzzle' report, Government must act to improve consumer protections in this sector.³³ This can provide a consistent and appropriate level of quality assurance to stamp out rogue traders. Crucially, in the event something does go wrong, it can make sure consumers find a swift resolution to their problems.

1 **Government should establish a single quality scheme for the low carbon home improvements market**, and make it mandatory for installers to be accredited in order to operate in the low carbon home improvements market. This single overarching body can provide consumers with a consistent level of protection, and ensure that rogue traders are prevented from operating. It would also benefit from much stronger brand awareness than the existing patchwork of different schemes.

3 Building on the recommendations of the CMA, **Government should conduct a holistic review of the current consumer protections landscape** in order to determine the best way to move towards a simpler model of consumer protection. For example, under the single overarching quality scheme there could be a continued role for existing certification bodies in compliance and monitoring. What matters most is that consumer-facing aspects are kept as simple as possible, with all interaction via the single overarching scheme.

2 **Regulation must also ensure that all consumers have easy access to independent advice and redress.** At a minimum, this would involve requiring all accredited installers participate in an ADR scheme, and ensuring there is adequately funded independent advice to provide people with information about their consumer rights. Consumers would then be able to resolve issues without the need to take a business to court. In other sectors the existence of multiple ADR schemes can be confusing for consumers, and risks a race to the bottom in terms of quality of dispute resolution. This could be further simplified through the set up of an Ombudsman, which would be able to act as a single point of contact for any consumer who is unable to resolve a dispute in this sector.

Redress processes can be unfamiliar and daunting to consumers - even when they're relatively simple.³⁴ Models like the 'Extra Help Unit' in the energy supply market provide significant support to the most vulnerable by taking on a case handling role to help navigate this process, focused on complex cases or potential loss of supply.³⁵ We already see contacts through our Consumer Service for advice on low carbon technologies. This is only set to increase as more progress is made in the retrofit sector. Consumer advice services should be appropriately resourced to help assist those most in need.

This long term reform is still needed despite industry-led initiatives such as the reforms to the MCS scheme.³⁶

Although these industry-led reforms are welcome they cannot address some of the major gaps in today's consumer protections regime. On their own, the schemes can't extend protections to all consumers, and without Government coordination could risk the wider protections framework becoming more confusing if other bodies choose to implement competing reforms of their own.

Some firms providing low carbon technologies are energy suppliers. They may offer these bundled with energy tariffs, which come with protections specified in the supply licence, and new regulations are on the horizon for flexibility services involving load control. These frameworks must complement each other and deliver simple, consistent protections.

Shorter term measures to improve consumer outcomes

We've also identified measures that improve outcomes for consumers in the short term, and help lay the groundwork for a smoother transition to more fundamental change.

Standards bodies should follow CMA guidance to ensure consistent outcomes for consumers from existing schemes

The CMA recently released a best practice guide for standards bodies in the green heating and insulation sector.³⁷

Government should carry out an audit of existing standards bodies to determine the extent to which their operations align with this guidance. Standards bodies should then work with the CMA to implement changes that tackle any issues that are identified.

The Clean Heat Market Mechanism can ensure more heat pump installations are carried out by certified installers

The Clean Heat Market Mechanism is due to be implemented in the coming months. It will incentivise the heating appliance industry to install an increasing share of heat pumps in homes.³⁸ We are pleased that Government has announced it will require installations to be certified under the MCS scheme (or similar) in order to count towards manufacturers' targets.³⁹

It's vital that this requirement is part of the mechanism when it launches. Without this, we're concerned that increases in heat pump sales could see an increase in consumer detriment, particularly from mis-selling, if companies rush to meet targets.

Use new supplier offers and financial products to expand coverage of quality schemes as much as possible

Alongside Government grants, financial institutions and energy suppliers are increasingly launching new offers to consumers in this market. These provide opportunities to extend the coverage of existing protection schemes, by specifying that work is carried out by accredited installers. We're encouraged to see lenders such as Barclays already building this into their green financial products.⁴⁰

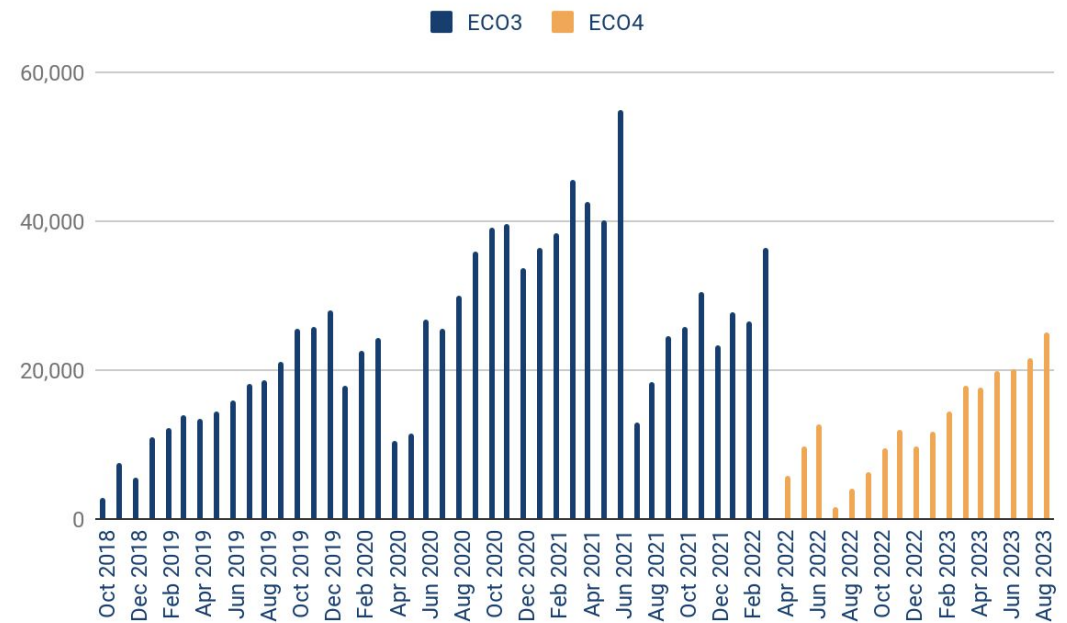
Remove bottlenecks to the uptake of Government grants

Currently, ECO4 - the flagship scheme for installing insulation and heat pumps in fuel poor households - is showing disappointingly low uptake. This has a knock-on effect on consumer protections, because while there is limited work carried out using these government grants, there is less incentive for contractors to become accredited.

Government should work with suppliers to improve the identification of eligible consumers and increase awareness of the scheme. Polling we commissioned last year showed that almost two thirds (64%) of homeowners had not heard of the ECO scheme. Of homeowners that had heard of ECO, almost three quarters (74%) of those on benefits either didn't know whether they were eligible or incorrectly stated that they weren't eligible.⁴¹

There is a risk that the newly launched Great British Insulation Scheme (GBIS) - an insulation scheme targeted at the able-to-pay market - could be plagued by similar problems. It requires work to be done to the same technical standards as ECO4, which makes it uneconomical to install low-cost measures due to high compliance costs.⁴² Unless uptake improves, Government should further explore the possibility of using the more streamlined Trustmark Licence Plus scheme for lower cost measures carried out under GBIS, which may be a way to boost uptake while still protecting consumers.⁴³ Crucially, this would also incentivise more installers to become accredited so they can carry out work under these schemes.

Number of measures installed under ECO, by month⁴⁴



Conclusion

To meet net zero targets, consumers will have to place their trust in unfamiliar technologies. But many are afraid that they might be scammed, while bad experiences with installing low carbon technologies can undermine consumer confidence.

Current consumer protections have too many gaps, and allow rogue traders to operate in the sector. We're concerned that without reform to make protections fit for the long term, we could see a rise in consumer detriment as more people install low carbon technologies. This could undermine trust in net zero, and make the rollout of low carbon technologies more politically challenging.

Government should establish a single accreditation body which licences all installers that are active in this market. It should also ensure that consumers have easier access to redress. At a minimum this would involve mandating all installers participate in an ADR scheme, but this could be further improved by establishing a single Ombudsman for the sector.

Following the CMA's recommendations, Government should carry out a holistic review of protections in this sector. This should identify the best way to move towards a simpler and more effective set of consumer protections.

Government must ensure that consumers can access independent advice about their consumers rights. We already see contacts to our Consumer Service regarding net zero technologies, and expect this to grow as more people engage with this market. Models like the Extra Help Unit in the energy supply market can also provide more dedicated support for consumers in vulnerable circumstances to help them solve any problems they may experience.

In addition to this, there are a number of no-regrets actions that can improve consumer outcomes today. The CMA's best practice guide for this market should be used to ensure that existing standards bodies align their practices as much as possible. This can provide more consistent outcomes for consumers.

More can also be done to increase the incentive for installers to become accredited. These include:

- Removing bottlenecks to the uptake of Government grants, and ensuring that technical standards are proportionate for low-cost measures
- Ensuring financial institutions and energy suppliers are partnering with accredited installers when offering consumers new products and services in this market

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