

Martin McCluskey MP, Minister for Energy Consumers Sir Geoffrey Clifton-Brown MP, Chair, Public Accounts Committee Gareth Davies, Comptroller and Auditor General, National Audit Office By email

21 October 2025

Dear Martin McCluskey MP, Sir Geoffrey Clifton-Brown MP and Gareth Davies,

Fixing Britain's Retrofit System

The scandal uncovered in the NAO report "Energy efficiency installations under the Energy Company Obligation" must be the moment we stop chasing quick wins and start building a retrofit system that works.

Proper training, independent inspection and safe remediation will deliver the warm, dry homes people were promised.

The Warm Homes Plan must guarantee that no family is left colder because of government failure. Our recommendations for the Warm Homes Plan were contained in letters to Minister McCluskey on 10 September 2025 [pdf] and to the Government on the Warm Homes Plan on 28 July [pdf].

Having read the NAO report, we would propose that the Government also considers the following measures:

- 1. Independent Quality Oversight and Data Transparency
 - Establish an independent Retrofit Regulator reporting to Parliament, responsible for oversight of all energy-efficiency installations — including those under ECO, the Warm Homes Plan, and any successor schemes.
 - Require public reporting of audit results, remediation progress and contractor performance, integrating data from TrustMark, Ofgem, the Energy Saving Trust and insurance providers.
 - Under the new regulator, raise the standards of audit required by one nationalised certification body which covers both heating and insulation upgrades.
- 2. Safe, Phased Remediation No Rushed Winter Rip-outs
 - Launch a national reinspection and remediation programme focused on the 30,000–36,000 homes identified by the NAO as defective.
 - Prioritise safety and seasonality: removing external wall insulation (EWI) in winter risks cold, damp homes and failed replacements. Repairs must be scheduled in safe conditions (above 5°C, dry weather) and accompanied by temporary heating or ventilation support for affected residents.
 - Commission technical reviews to determine when failed installations can be salvaged through ventilation or patch remediation, avoiding unnecessary distress or waste.

3. Accountability with continuity

- Hold energy suppliers, managing agents and certification bodies financially accountable for poor oversight, including fines or remediation cost recovery where negligence is proven.
- Introduce a fit-and-proper register of directors and firms, preventing phoenix companies or repeat offenders from re-entering the supply chain.
- Maintain ECO4 activity to avoid collapse of legitimate contractors and the loss of skilled jobs, but use a "repair and reform" model that keeps funding flowing but tightens quality control immediately.

4. Skills, Standards and the Warm Homes Guarantee

- Scale up the 9,000 subsidised training places into a national retrofit skills programme with accredited qualifications, fair pay, and pathways for retraining from construction and heating sectors.
- Embed a Warm Homes Guarantee within the Warm Homes Plan: every publicly funded installation should deliver verified improvements in warmth, safety and energy savings or be put right at no cost to the resident.
- Require independent, randomised inspections of funded works, with results feeding back into contractor ratings.

5. Consumer Protection and Local Confidence

- Create a single redress and complaints portal for all retrofit programmes covering installation issues, contractor conduct and insurance disputes.
- Provide temporary support packages (such as emergency heating or dehumidifiers) for households awaiting remediation to prevent health impacts.
- Work with local authorities, trusted community organisations and advice services to rebuild public confidence, ensuring residents understand what safe, high-quality retrofit looks like.
- Ensure all homes that have had ECO4 or GBIS measures installed are inspected for quality and performance.

6. Link Retrofit to Energy Security and Fair Pricing

- Pair insulation and ventilation upgrades with a clear pathway off volatile gas prices, supporting clean-heat technologies and renewable energy generation.
- Integrate retrofit with wider energy pricing reform tackling unfair standing charges and ensuring the savings from insulation are not wiped out by market failures.

We would be happy to meet with you to discuss these recommendations.

Best wishes Simon Francis, coordinator

About the End Fuel Poverty Coalition

The End Fuel Poverty Coalition is a <u>broad coalition of more than 100 anti-poverty, health,</u> housing and environmental campaigners, charities, local authorities, trade unions and

<u>consumer organisations</u>. It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We believe that everybody has the right to a warm, dry home that they can afford to heat and power.

Members of the Coalition include: Action with Communities in Rural England, ACE Research, Age UK, All Birmingham's Children, Austerity Action Group, Association of Green Councillors, Association of Local Energy Officers, Association for Decentralised Energy, Asthma + Lung UK, Basingstoke & Deane Borough Council, Beat the Cold, Bruton Town Council, Camden Federation of Private Tenants, Carers Trust, Child Poverty Action Group, Church Poverty Action, Chartered Institute of Environmental Health, Chartered Institute of Housing, Community Action Northumberland, Centre for Sustainable Energy, Climate Action Network West Midlands, Debt Justice, Disability Poverty Campaign Group, Disability Rights UK, E3G, Energise Sussex Coast, Energy Advice Line, Energy Cities, Epilepsy Action, Exeter Community Energy, Fair Energy Campaign, Fair By Design, Foster Support, Fuel Poverty Action, Fuel Poverty Research Network, Generation Rent, Good Law Project, Groundwork, Hackney Foodbank, Heat Trust, the HEET Project, Home Start Oxford, Independent Age, Independent Food Aid Network, Inner City Life, Joseph Rowntree Foundation, Lambeth Pensioners Action Group, London Borough of Camden, London Borough of Lewisham, Marches Energy Action, Marie Curie, Mencap, Mayor of London, MECC Trust, Moorland Climate Action, National Pensioners Convention, National Union of Students / Students Organising for Sustainability, NCB, National Energy Action, New Economics Foundation, National Federation of Women's Institutes, Northern Health Services Alliance, Oxford City Council, Positive Money Tower Hamlets, Plymouth Community Energy, Redcar & Cleveland Council, Repowering London, Retrofit Bruton, Right To Energy Coalition, Rossendale Valley Energy, Ryecroft Community Hub, Save the Children, Sense, Severn Wye, Scope, Shaping Our Lives, Social Workers Union, South Dartmoor Community Energy, South East London Community Energy, Southwark Group of Tenants Organisations, South West London Law Centres, Stop The Squeeze, Tamar Energy Community, Thinking Works, Uplift, UNISON, Warm & Well North Yorkshire, Warm & Well in Merton, Winter Warmth Network, Young Lives vs Cancer, 361 Energy.

The Coalition is also part of the <u>End Child Poverty Coalition</u> and the <u>Renters Reform Coalition</u>. We work closely with <u>Energy Action Scotland</u>, <u>NEA Wales</u> and the <u>Fuel Poverty NI coalition</u>. The coordination for the <u>End Fuel Poverty Coalition</u> is provided by social enterprise <u>Campaign Collective</u>.

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