

General Response to Bonfield Report

In principle the members of ALEO East Midlands network welcome the report and the recommendations however the following concerns are to be noted:

- 1) The recommendations appear to lack detail especially in terms of actual delivery and enforcement;
- 2) Members are concerned that ALEO, being one of the largest representative bodies of local energy officers working on domestic energy efficiency and the eradication of fuel poverty has not been consulted or mentioned in the review;
- 3) Throughout the review there is an absence to any mention of local authorities. The review seems to suggest that local authorities have no role to play. This is both alarming (as we are the trusted first point of contact for many vulnerable clients) and contradictory to other Government schemes in this field such as HECA. Furthermore there is no acknowledgement of the different tiers of councils e.g. unitary and district as they have different responsibilities.

Recommendation 1

Develop a set a minimum requirements for a Code of Conduct for all organisations that wish to gain the quality mark, including agreed requirements on issues such as sales practices, better pre-contractual information, and a requirement for appropriate financial protections for installations.

Response

Whilst we welcome this suggestion we would like to draw Government's attention to the fact that there is a code of conduct under the Green Deal: will this new code of conduct replace this?

Any code of conduct should not add to increased bureaucracy as unnecessary and complicated form filling directly translates into:

- Less delivery on the ground
- Puts off contractors from engaging in the schemes
- Complicates and often deters households from engaging
- Not a good use of resource
- Makes monitoring more difficult

The responses of this section need to be cross referred to Recommendation 15 as well as this mentions the development of a quality mark.

Recommendation 2

From the code of conduct, write a clear Consumer Charter setting out what a household can expect from organisations across the energy efficiency and renewable energy sector covering the entire consumer journey

Response

Again members welcome the idea of the charter however we feel that there is an absence of detail into what exactly the charter will include and exclude and therefore makes it difficult to fully endorse in principle.

The charter needs to be clear, easy to understand and unambiguous. This is particularly important to engage with vulnerable customers.

The charter, in order to be effective needs to be made available to everybody therefore it should be made available in large print, other languages, braille etc. Furthermore the charter needs to be made available in easy to access locations e.g. libraries, from the installers etc

Recommendation 3

Ensure the quality mark is easily recognised by consumers as providing appropriate protection and effective signposting to reliable organisations that meet its requirements through sustained promotion.

Response

It is important that the quality mark is established and easy to recognise as well as not being prone to change, we need to have standardisation in the sector. It is also important to have weighty consumer protection for any schemes.

This will require a well planned and executed launch campaign of the brand as well as ongoing programme of raising awareness. This will require funding but the document does not mention what funding is available or where from?

Recommendation 4

Put in place a consistent and fair redress process, including providing a single point of contact for consumers, with the capability to support vulnerable consumers, an agreed standard for complaint handling, and access to ADR.

Response

Members welcome a single point of contact as this removes some of the bureaucracy, however, often the customers accessing support will be vulnerable and may not be able to, or choose to, access support directly. They will require some form of advocacy support. Normally such clients come to their local authority for support therefore it is important that local authority officers are able to engage on behalf of vulnerable clients. The system will need to take note of the issues stipulated around Data Protection.

Whilst a fair redress process is a good thing again there is a lack of clarity as to what this will exactly look like.

Who will single point of contact be? Is this going to be Energy Ombudsmen?

In order for the charter to be effective it is important that there is enforcement protection. Who will this be done by and how will it be administered?

Recommendation 5

Develop new approaches for engaging consumers with energy efficiency and renewable energy (e.g. by using trigger points and promoting the wider benefits of the measures which are valued by households), and deliver awareness raising programmes at national and local levels.

Response

What are the “trigger points” going to be? Who will be monitoring and determining these? There is no link to current practices in the energy sector. The HECA Act is already in place to enable engagement with customers. It will be good for this work to link in with the HECA reporting. In view of this it will be beneficial to engage with local authorities officers through ALEO.

Recommendation 6

Make available a set of impartial information and guidance to support more effective industry communications with customers and to aid consumer decision-making on installing measures, by establishing a central Information Hub (to act as a collection point for best practice advice and guidance) and a Data Warehouse (to act as a store for property-level data and information).

Response

This seems very similar to the role of the former Energy Efficiency Advice Centres (EEACs). Will there be localised contact points or will there be a single national contact point?

Will the EPC data be on the Data Warehouse and will this be free to LAs to access?

Is the Central Information Point going to be the same organisation as the Data Warehouse?

Independent log books for each household, seems like a good idea in practice but who will be responsible for collecting the information?

Previously LAs were unable to access data, will they be able to get access this time?

Recommendation 7

Develop a range of services and tools linked to the Information Hub and Data Warehouse to provide advice (both online and by telephone) and to enable engagement with all consumers, including vulnerable households in ways most appropriate to them.

Response

What is the definition of a “consumer”? One major concern is whether local authorities will be able to represent vulnerable clients and access information on their behalf?

Recommendation 8

Develop an overarching standards framework document for the end-to-end delivery of retrofit of energy efficiency and renewable energy measures, building on existing standards and make it freely available (under licence) to all those installing under the new Framework.

Response

In principle this sounds like a good idea however again the document lacks detail in the practical delivery

of it. Will this standard replace existing standards or will be an extra tier on top? Will it be mandatory or will it be an opt in?

Will there be any enforcement powers attached to it?

Recommendation 9

Establish a Retrofit Standards Task Group to address the UK's standards needs in the retrofit sector in the broadest sense, i.e. including formal and non-formal standard solutions, as appropriate in the short and long-term.

Response

Who is going to sit on the Standards Task Group?

Will LAs and Consumer groups be represented on this Task Group?

How will members be appointed?

It is important to have a balance of stakeholders from across the sector.

We would suggest having a representative from ALEO on this Task group is the best way to represent LAs across the country.

Recommendation 10

Commission a research project to map existing formal and informal standards to shape and deliver a standards development programme for retrofit.

Response

No comment

Recommendation 11

Industry to begin to embed core knowledge, including basic building physics, design stage and consumer interaction into all relevant vocational and professional pathways, including qualifications, training courses and apprenticeships.

Response

Improvements to training in this sector are welcomed.

Shouldn't this be happening already?

There needs to be co-ordination between the education sector and the energy sector.

It is important to have standardisation of courses in the sector with a recognised qualification, that consumers can identify.

Recommendation 12

Improve the way in which businesses are assessed for 'competence', acknowledging the correct mix of skills, knowledge and experience for all roles; and back this up with a consistent assessment strategy and Approach to recognising Prior Experiential Learning (APEL).

Response

ALEO East Midlands support improvements to assessing business competence.

Will these be linked to or an expansion of existing standards?

Due to the market it is important to make sure there is clear recognition of the standards by consumers.

As companies come and go in the renewable sector it is important to have more standardisation, for example the MCS standard.

Recommendation 13

Establish a process for greater collaboration within the skills sector to ensure that the appropriate skills and knowledge are properly and consistently integrated across the sector and are available for all.

Response

ALEO East Midlands agree with this recommendation and believe it will lead to a more skilled and competent workforce which will be in the consumers best interests.

Recommendation 14

Develop, deliver and maintain a strong consumer-facing brand in the form of a new quality mark, which provides effective redress for the consumer and has a positive association with reputable products and services.

Response

Agree it needs to be different from the range of branding which is currently in place to avoid confusion.

Recommendation 15

Identify or establish an organisation to develop and oversee the quality mark and facilitate activities for the day-to-day management of the quality mark, including enforcement, sanctions, technical, operational, and consumer protection related activities.

Response

Referenced earlier to Recommendation 2. What fees will have to be paid to be part of the trademark for contractors, etc.

Who is going to be carrying out the enforcement?

In 12.9 it talks about taking action 'where voluntary adherence to codes and standards cannot be assured': it is not clear if adherence to the code and standards is only going to be voluntary or if the intention is to make it mandatory?

Recommendation 16

Put in place a robust and joined-up industry-wide compliance and enforcement regime coordinated nationally; share information on the quality of assessors, designers and installers to facilitate the identification and sanctioning of poor practice, as necessary; and review and align the frequency of, and mechanism for performing, technical monitoring or on-site audits, possibly introducing a random audit and risk-based approach (where the monitoring frequency is increased when poor quality installations are detected).

Response

Seems rather expensive and over burdensome for the smaller contractors.

What warranties and future protection will be put in place to protect the consumer if a company goes out of business?

Will there be a refund if the installer goes out of business?

Recommendation 17

All Retrofit projects will have an appropriate design stage process which takes a holistic approach and adequately considers the home, its local environment, heritage, occupancy, and the householders' improvement objectives when determining suitable measures.

Response

No comment.

Recommendation 18

Put in place a process for gathering information and the design specification ahead of any installation of insulation or fabric measures; store this in the Data Warehouse for future use and to facilitate continuous improvement; and load aftercare support and quality information into the Data Warehouse following an installation.

Response

Will the Data Warehouse store information on the warranties for measures installed?
How will it deal with new products?

Recommendation 19

Ensure that the Insulation and Fabric workstream feeds into the standards, skills and quality assurance development processes, and that these reflect best practice, and fully take account of the issues specific to the measures.

Response

No comment.

Recommendation 20

Provide tailored home energy efficiency advice to consumers during the smart meter installation visit, and ensure key delivery partners work together to deliver a good customer journey throughout the roll-out.

Response

Auditing is critical, and it must be up to a recognised standard for example, for sub-contractors.
Will they be audited?
Smart meter rollout should be doing this anyway.
This seems like an opportunities to engage with consumers, which is mentioned in recommendation 5.

Recommendation 21

Industry should work together to ensure that the capacity and skills of smart meter installers deliver a safe and efficient roll-out.

Response

Similar response to Recommendation 20

Recommendation 22

Industry should work together effectively to ensure that smart meters can be installed in as many properties as possible, regardless of property type.

Response

Business as usual.

Recommendation 23

Undertake a review of all technologies covered by the Framework to identify

compatibility with the new Framework; and develop action plans for each technology, as required, to align with the new Framework.

Response

No comment.

Recommendation 24

Industry to develop a set of independent, impartial advice document and/or web-based tools for both consumers and the supply chain covering each specific technology, where possible using existing material, and working with the organisation responsible for delivering the Information Hub.

Response

Will LAs be able to represent consumers and have access to this Hub?

The consumers and supply chain has been mentioned however, LAs have been left out; if we are assisting vulnerable customers (and fulfilling our HECA duties) we will need access to the Information Hub also.

Recommendation 25

Ensure the new Framework is sufficiently flexible to cover existing technologies and facilitate the entrance of new technologies; and develop a route map setting out the steps that new technologies will need to go through to operate under the Framework.

Response

No comment.

Recommendation 26

Industry to develop any relevant new standards, specifications and guidance covering the integration and inter-operability of home energy technologies under the Framework, and consider these as part of standards mapping exercise recommended by the Quality and Standards workstream.

Response

Agree in principle with the need for stronger integration between technologies but it is hard to comment further without knowing the details of the framework.

Recommendation 27

Housing Associations will collaborate with industry and government to ensure that the Framework applies to the delivery of improvements in their housing stock, incorporating energy efficiency and renewable energy measures at scale.

Response

Chapter 16 talks about social housing but refers only to Housing Associations; what about LAs with social housing they are also committed to improving energy efficiency, reducing emissions and providing affordable warm homes. Is there a reason for not including local authority social housing in this section?