



**Warm Healthy
Homes**



Department for
Communities
www.communities-ni.gov.uk

Warm Healthy Homes Fund

Consultation on an energy efficiency scheme to improve warmth, health and energy affordability of low-income households in the owner-occupier and private rented sectors.

[Email Response Form](#)

Warm Healthy Homes Fund Consultation

Enquiries to:

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How to Respond

This consultation will be hosted online at the following website: [NI Direct - Citizen Space](#). The Citizen Space website has been specially designed to be as user-friendly and welcoming as possible for those who wish to complete the consultation. It also allows DfC to rapidly collate results. For this reason, we would encourage anyone who is interested in responding to this consultation to utilise Citizen Space as the method of their response.

Your response will be most useful if it is framed in direct response to the questions asked, though further comments and evidence are also welcome.

If this is not possible, you can however respond to this consultation via email to HEB@communities-ni.gov.uk by completing this form on the departments website or you can respond in writing to the following address:

Warm Healthy Homes Fund Consultation

Department for Communities

Climate Change Division

4th Floor, Causeway Exchange

1-7 Bedford Street

Belfast

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BT2 7EG

When responding via email or in writing, please state whether you are responding as an individual, or representing the views of an organisation (please state the name of the organisation). Please also quote the following reference in your response: “Warm Healthy Homes Fund Consultation”. In addition, when replying via email, it is possible to add supporting information to your response, either by way of an attachment or by posting text in the body of the email. Please ensure that you reference the question the additional information is in response to when doing so.

Responses must be received by **23:59 on 19 August 2026**.

Please contact us if you require this document in an alternative format for accessibility purposes.

General Information

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What best describes your interest in this consultation

1. Member of the public
2. Academia
3. Energy Efficiency/Heating supplier
4. Energy Efficiency/Heating installer
5. Government representative
6. Arms Length Body
7. Fuel Poverty representative organisation
8. Other (please specify)

Please indicate if you are replying as:

1. An individual / Member of the Public
2. On behalf of a body or organisation (please specify who you represent below)



Fuel Poverty Coalition Northern Ireland

The Fuel Poverty Coalition Northern Ireland (FPC NI) is united by a shared ambition to eradicate fuel poverty in Northern Ireland. **We have consistently called for a new, more ambitious domestic energy efficiency scheme that is well resourced, targeted and capable of delivering lasting improvement to the homes of fuel-poor households.** [Polling](#) conducted for National Energy Action Northern Ireland (NEA NI) in 2025 found that as many as 39% of households are living in fuel poverty.¹ Improving domestic energy efficiency is an essential part of the long-term solution to reducing fuel poverty, improving health and wellbeing, and supporting a Just Transition to net zero.

In March 2025, the FPC NI submitted a joint response to the Department for Communities' (the Departments') consultation on a draft Fuel Poverty Strategy for Northern Ireland.² In that [response](#), we welcomed the strategy's commitment to improving the energy efficiency of vulnerable households, and we made a number of recommendations to strengthen the design and delivery of future domestic energy efficiency schemes. Since then, coalition members have continued to engage extensively with the Department and the wider Executive about addressing fuel poverty and improving domestic energy efficiency.

The FPC NI therefore sincerely welcomes the publication of the Warm Healthy Homes Strategy 2026 – 2036, its commitment to establish a long-term Warm Healthy Homes Fund (the Fund) in 2027, and the opportunity to respond to this consultation on the detailed design of the scheme. Overall, we believe the proposals represent a significant step forward from the current Affordable Warmth Scheme and demonstrate that many of the issues raised by stakeholders during previous engagements have been considered.

We make these comments with the understanding that the Department has determined that **£150 million** over the first five years is required to deliver the ambition of the Fund. **We remain deeply concerned that this funding has not yet**

¹ NEA NI, (2025). '[LucidTalk – NEA NI: September 2025 – NI Attitudinal Poll](#)'.

² FPC NI, (2025). '[Response to Department for Communities: Consultation on a new Fuel Poverty Strategy for Northern Ireland](#)'.

been confirmed. We therefore take the time to submit this response with the expectation that the Department and the wider Executive will do everything in its power to secure and prioritise this investment. Without sustained funding, the ambitions set out for the Fund will remain a concept, rather than a reality that delivers meaningful improvements for households experiencing fuel poverty.

In summary, the FPC NI welcomes the overall direction of travel set out in the consultation. We support many of the proposals, but not all, and have put forward recommendations to improve some aspects of the scheme’s design before it is finalised, so that it is person-centred, well targeted and capable of delivering the greatest benefits for households most affected by fuel poverty.

This response is endorsed by:

- Advice NI
- Age NI
- Bryson Energy
- Carers NI
- Chartered Institute of Housing Northern Ireland
- Marie Curie Northern Ireland
- National Energy Action Northern Ireland
- Peninsula Healthy Living
- Rural Community Network
- RNIB Northern Ireland
- Sustainable Northern Ireland
- Trussell
- UNISON Northern Ireland
- Women’s Regional Consortium
- Women’s Support Network



Proposal: Eligibility

Question 1

Given the limitations of funding, the Department proposes that households in receipt of the Personal Allowance of Universal Credit (for three consecutive periods) and those in receipt of Pension Credit are eligible for assistance. In addition, income under a set threshold will also be used as an eligibility criterion. It proposes that the total household income threshold of the new Warm Healthy Homes Fund should be set at the rate of the National Living Wage, which is currently £29,741.40, net of tax and national insurance, and that it should rise annually in line with the National Living Wage.

Under this proposal, the Department proposes to exclude certain disability and health related benefits and allowances from the income threshold, including the winter fuel payment, recognising that these households may have higher energy needs.

Do you agree with the proposed approach when assessing eligibility for the Warm Healthy Homes Fund?

☒ Yes

☐ No

Please give reasons for your answer limited to 500 words.

The Fuel Poverty Coalition NI agrees with the Department's proposed eligibility criteria for the Warm Healthy Homes Fund. We recognise that it can be difficult to develop eligibility criteria that identifies every household experiencing or at risk of fuel poverty. Some members have raised concerns about households who could benefit from the Fund, but who could fall just above the income threshold. It is challenging to unreservedly endorse an income threshold, but we recognise the need to target the scheme's limited funding towards those in greatest need. On balance, we consider the Department's proposed approach to be fair and proportionate to prioritise support.

We welcome the higher proposed income threshold, particularly when compared with the current Affordable Warmth Scheme. The existing £23,000 threshold no longer reflects the realities of household finances or the significant increases in the cost of living over recent years. We also welcome the inclusion of low-income households who are not in receipt of means-tested benefits, but who can still experience fuel poverty and the struggle to maintain a warm home.

The coalition supports the proposal to disregard certain disability and health-related benefits and allowances, including Carer's Allowance and the Winter Fuel Payment, when calculating household income. This recognises that these households often have higher energy needs and unavoidable additional costs. We would, however, welcome **clarification** from the Department that Contribution-based Employment and Support Allowance (CB-ESA) will also be disregarded, as it is not specifically listed in the consultation document as one of the exclusions and some people continue to receive CB-ESA.

We particularly support the proposal to uprate the income threshold annually in line with the National Living Wage. This reflects our previous recommendation that eligibility thresholds should be reviewed regularly to keep pace with the cost of living and avoid becoming outdated.

Eligibility criteria should remain under review throughout the lifetime of the scheme, with continued engagement with organisations supporting households experiencing fuel poverty. This will help ensure the Fund reaches those most in need and that any unintended gaps are identified.

FPC NI members have also highlighted additional considerations that should be taken into account. For some self-employed households, particularly those working in farming and related industries, income can be seasonal and fluctuate throughout the year. These households require three consecutive Universal Credit assessment periods which could mean some households are only eligible at certain times of the year, despite having low annual incomes and living in homes in need of energy efficiency improvements. The Department should also consider the practical challenges of providing up-to-date financial information, such as farm accounts, which are often not finalised until the following year.

Finally, alignment across government energy efficiency schemes will be essential to maximise impact and avoid gaps in support. Eligibility checks should be robust enough to protect public funds while remaining straightforward for applicants.

Where possible, existing government data should be used to verify benefit entitlement and property ownership, rather than requiring applicants to provide evidence that the government already holds. Consistent implementation across NI will also be important to ensure that the eligibility criteria is applied fairly and that there is no postcode lottery in accessing the Fund.

Proposal: Savings

The Department proposes that household savings should be taken into account in a proportionate way, recognising the need for some savings while ensuring support is targeted at those most in need.

Under this proposal, households may hold up to £6,000 in combined personal savings without this affecting eligibility. Savings above this level would be treated as income using an established approach already applied in other government schemes. The rate at which savings are counted would differ depending on the age of the applicant, with a more generous treatment for those aged 60 and over.

The Department is seeking views on whether this approach to savings is appropriate.

Question 2

Do you agree with the proposed approach to how household savings are treated when assessing eligibility for the Warm Healthy Homes Fund?

- ☐ Yes
- ☐ No

Please give reasons for your answer limited to 500 words.

The Fuel Poverty Coalition NI supports the principle of taking household savings into account when assessing eligibility for the Warm Healthy Homes Fund. Including savings should help ensure support is better targeted towards those in greatest need.

We also recognise that the Department's proposed approach broadly aligns with the treatment of savings within Universal Credit, where lower levels of savings are disregarded and higher levels are progressively taken into account.

However, there are differing views within the coalition on the proposed savings threshold and how savings should be treated.

Some members consider the Department's proposals to provide a realistic reflection of the financial circumstances of many households their organisation supports. Furthermore, research consistently shows that many households have little to no savings. The Family Resources Survey 2023/24 reported that 39% of NI households have less than £3,000 in savings/investments and 15% have no

savings/investments at all.³ From this perspective, the proposed approach would effectively target support towards those with the least financial resilience.

That said, other members question whether the proposed £6,000 disregard is sufficient. For example, some older households may have drawn down pension savings that are intended to supplement modest retirement incomes over many years, rather than representing readily available disposable wealth. More generally, financial guidance often recommends that households hold emergency savings equivalent to around six months' essential living costs. The Department should therefore consider whether the proposed threshold appropriately reflects the level of savings that households need for financial resilience.

FPC NI also recommends that the Department considers whether certain categories of savings above £6,000 that are clearly earmarked for specific purposes should be treated differently where appropriate. For example, this could include savings held for essential home adaptations or renovations to make a property fit for an older or disabled person, or savings held in a Lifetime ISA or similar account for a home deposit. In particular, lump-sum payments received from DfC as a result of benefit underpayments should be disregarded. This money represents income that an individual was previously owed but had to live without, potentially for a considerable period of time, and should not subsequently disadvantage them when accessing support.

Finally, we would welcome **clarification** on whether the finalised savings disregard will be reviewed or uprated over time. As with the proposed annual uprating of the income threshold, the savings limit should not become outdated through inflation.

³ NISRA, (2025). '*Family Resources Survey: Northern Ireland 2023/24*'.

Proposal: Prioritisation of applications

Given the large number of households likely to be eligible for the Warm Healthy Homes Fund and the limited budget available, the Department proposes prioritising applications after eligibility has been confirmed.

To ensure funding is targeted at those most in need, the Department proposes prioritising properties with the lowest energy efficiency. Applications would therefore be prioritised based on the Energy Performance Certificate (EPC) rating of the property, with priority given to homes rated EPC E or below, as these households are more likely to experience severe fuel poverty.

All eligible properties would require a home assessment to confirm the EPC rating. Home assessments would be carried out on a first-come, first-served basis; however, due to budget constraints, not all eligible properties may ultimately receive support.

The Department is seeking views on whether this is an appropriate approach to prioritisation.

Question 3

Do you agree that the Department should prioritise Warm Healthy Homes Fund applications based on the energy rating of the property?

☐ Yes

☒ No

Please give reasons for your answer limited to 500 words.

The Fuel Poverty Coalition NI does not agree with EPC -only prioritisation. EPC ratings should form part of the prioritisation process after household eligibility has been established, but they should not be used as the sole or primary basis for determining which households receive support.

A more person-centred, multi-factor approach is needed to better reflect the complex reality of fuel poverty. While the energy efficiency of a property is an important consideration, EPC ratings alone are insufficient to prioritise need. They

do not capture the full picture of household vulnerability, including factors such as health, disability, age, and higher energy needs.

The coalition also recognises that the EPC methodology has limitations. Although EPCs are currently the primary measure of domestic energy efficiency in Northern Ireland and can be a useful tool for targeting support, they rely on assumptions about factors such as fuel costs, which can quickly become outdated as energy prices change. This means EPC ratings do not always reflect the real-world energy performance of a property.

Experience from other schemes also highlights the risks of relying too heavily on EPC criteria. For example, under the Energy Company Obligation (ECO) scheme in Great Britain, some fuel-poor households were excluded from getting necessary measures because their homes already met EPC Band D or because it was considered economically unviable to improve the property to Band D.⁴

Until a better measure is available, EPC ratings should continue to play a role in assessing property need. However, they should be considered alongside wider indicators of vulnerability to ensure the Warm Healthy Homes Fund reaches those households most in need.

If you answered no, do you think that the Department should prioritise applications based on another reason?

Please provide detail limited to 500 words.

The Fuel Poverty Coalition NI recommends a blended and more holistic, person-centred prioritisation model, that combines EPC ratings with wider indicators of household vulnerability.

We suggest building on the existing vulnerability matrix used in the Northern Ireland Sustainable Energy Programme (NISEP)⁵. This was developed with input from NEA NI and is already used to target support towards households most at risk. Assessing applications using a scoring matrix would enable prioritisation to reflect both the condition of the property (energy efficiency, heating system, prevalence of damp and

⁴ Energy Efficiency Infrastructure Group, (2023). *'ECO Briefing – Autumn 2023'*.

⁵ Utility Regulator, (2024). *'Framework Document for the Northern Ireland Sustainable Energy Programme 2025-27'*, pp. 84 - 86.

mould) and the circumstances of the occupant(s) (such as age, dependents, health, and disability).

We also support a role for professional judgement by the Fund's Managing Agent, within a clear and consistent framework, to consider exceptional household circumstances where appropriate.

Finally, we would welcome **clarification** from the Department on how EPC assessments will operate in practice. For example, we would like to know whether the Department thinks there are enough assessors to carry out all the Home Assessments without delays or backlogs, and what will constitute an "up-to-date" EPC. We also request information on whether all eligible households will receive a Home Assessment, regardless of whether they are ultimately prioritised for funding, and whether EPC assessments will be arranged and funded through the scheme or if applicants will be expected to obtain and pay for one themselves.

Proposal: Private Rented Sector

Question 4

The Department proposes that Private Rented Sector landlords may access fully funded cavity and loft insulation, draught proofing, and ventilation, provided their tenant meets Warm Healthy Homes Fund eligibility criteria.

Do you agree with this proposal?

☒ Yes

☐ No

Should additional measures be included such as replacement windows, solar photovoltaic (PV) systems and electrical energy (battery) storage?

Do you agree with this addition?

☒ Yes

☐ No

If you answered No to either of these questions, please give reasons for your answer limited to 500 words.

The Fuel Poverty Coalition NI agrees with the proposal to allow Private Rented Sector (PRS) landlords to access fully funded cavity and loft insulation, draught proofing and ventilation where the tenant meets the Fund's eligibility criteria. While there are differing views within the FPC NI about extending this support to additional measures such as replacement windows, solar PV and battery, we have on balance, determined to support this. However, this support is subject to safeguards to ensure that public funding primarily benefits tenants experiencing fuel poverty and does not disproportionately subsidise landlords.

Fuel poverty is particularly prevalent in the PRS, and tenants should not be disadvantaged simply because they live in privately rented accommodation. This is especially important in the absence of Minimum Energy Efficiency Standards (MEES) for PRS properties in Northern Ireland, which the FPC NI continues to call for. Until landlords are required to meet MEES, enabling eligible PRS properties to access the

Fund seems to be the most practical option to improve the homes of low-income tenants.

There are differing views within the FPC NI about the inclusion of additional measures. Some members consider that public funding should focus primarily on fabric measures, such as insulation, draught proofing and ventilation, which can make the greatest difference to warmth. They are concerned that fully funding additional high-cost measures could represent a disproportionate public investment in privately owned assets. Alternative support, such as low-interest loans, could potentially be considered for these measures through future schemes, including the Department for the Economy's developing domestic energy efficiency and low-carbon heat scheme.

Other members support access to the full range of measures, given the high levels of fuel poverty in the PRS and the need to prioritise the interests of tenants. Many landlords may also be accidental landlords or lack the resources to fund improvements themselves.

On balance, the FPC NI supports the inclusion of additional measures, provided appropriate safeguards are in place. For instance, the Department should consider landlords' property portfolios and limit the number of properties that any one landlord can have upgraded through the Fund. Where demand exceeds available funding, priority should be given to the worst first, with a vulnerability matrix used to consider both property condition and tenant circumstances.

Finally, tenant protections must accompany any publicly funded improvements. Measures should be put in place to minimise the risk of rent increases or evictions following improvements, so that the benefits of the scheme are realised by the households it is intended to support. The FPC NI continues to support the introduction of MEES as an important longer-term solution to ensure landlords take responsibility for bringing PRS properties up to an appropriate energy efficiency standard.

Proposal: Grant Limits

The Department proposes setting a grant limit of £35,000 for the Warm Healthy Homes Fund that will allow for a fabric first, whole house approach including Air Source Heat Pump, solar photovoltaic (PV) systems and electrical energy (battery) storage.

This will be increased to £45,000 to support those ‘hard-to-treat’ properties i.e. those of Non-Traditional Construction, Solid Wall Construction or have Environmental Constraints.

Up to £500 will be included within the grant limit for properties that require some general maintenance or remedial works before energy efficiency measures can be installed. It is anticipated that not all properties will require the full grant limit.

Question 5

Do you agree with this proposal?

- ☒ Yes
☐ No

If you answered No, please give reasons for your answer limited to 500 words.

The Fuel Poverty Coalition NI agrees with the proposed grants limits, including £35,000 standard cap, £45,000 grant for hard-to-treat properties, and the inclusion of a £500 grant for general maintenance or remedial works. We strongly welcome this level of proposed investment, as this reflects what is required if the scheme is to deliver meaningful whole-house energy efficiency improvements and tackle fuel poverty.

We particularly welcome the higher grant limit for ‘hard-to-treat’ properties. Rural homes and older housing stock can require significantly greater investment due to construction type, off-gas grid dependency, and higher installation costs linked to logistics and limited market competition. Recognising these additional costs is important to support a fair and just transition.

Strong cost control and value for money will be essential. The Department should ensure robust procurement arrangements and effective oversight of contractor

pricing to minimise the risk of inflationary pricing or contractors simply maximising the grant available.

We also welcome the £500 grant for general maintenance or remedial works. This could support households who might otherwise be unable to participate in the scheme. However, we seek further **clarity** on what works this allowance will cover and how it will be applied in practice.

It is also really important that households are properly informed about the practical implications of the works. This should include information about any preparation that may need to be undertaken and any changes or redecorating they may need to have done after. The Department should also consider how households, particularly older or disabled people, will be supported with practical tasks such as clearing loft spaces before work begins and restoring areas following installation. We are concerned that there is limited consideration of this in the consultation proposals.

Similarly, the Department also needs to **provide information** on how the scheme will address situations where households need to temporarily leave their home while works are being carried out. The consultation does not appear to set out what support would be available in these circumstances, including whether any temporary accommodation would be arranged and how any associated costs would be covered.

Proposal: Application Limit

Question 6

The Department proposes that an applicant may apply only once to the Warm Healthy Homes Fund and that the Home Assessment will determine what support that property would benefit from.

Do you agree with this proposal?

☐ Yes

☒ No

If you answered No, please give reasons for your answer limited to 500 words.

The Fuel Poverty Coalition NI does not agree with the proposal that an applicant may only apply once to the Fund. We understand there may be an administrative rationale to this approach, but a blanket one-application rule is too rigid and does not reflect the realities of life circumstances.

It may not always be practical or appropriate for all recommended measures to be carried out in one period. We therefore recommend allowing exceptions to the one-application rule in defined circumstances.

We would also welcome **clarification** from the Department on what “apply only once” means in practice. Does this mean one application per household or one application per property? For example, could a household apply again if it moved to a different property and still met the eligibility criteria?

Proposal: Quality Standards

To ensure that energy efficiency measures delivered through the Warm Healthy Homes Fund are installed safely, consistently and to a high standard, the Department proposes that registered contractors working on the scheme should be assigned to householders and that they must hold appropriate, measure-specific accreditations.

Question 7

The Department proposes that a list of registered contractors would be provided to households to deliver the works identified by the Home Assessment, ensuring ease of access and a streamlined service for applicants.

Do you agree with this proposal?

☒ Yes

☐ No

If you answered No, please give reasons for your answer limited to 500 words.

The Fuel Poverty Coalition NI agrees with the proposal to provide households with a list of registered contractors to deliver the works identified by the Home Assessment. This is important for consumer protection and confidence. Requiring contractors to meet recognised, measure-specific accreditations should provide greater confidence that work will be completed safely and to a high standard.

Providing households with a list of registered contractors would also simplify the process by removing the need for applicants to identify and vet contractors themselves or establish whether they meet the Fund's requirements. This represents a significant improvement on the current Affordable Warmth Scheme, which does not provide an equivalent list.

The process for establishing and maintaining the list should be fair and transparent. The public procurement process should ensure that both larger and smaller local businesses have a genuine opportunity to participate. The scheme could provide valuable opportunities for local contractors and support the development of the workforce needed to deliver energy efficiency improvements across Northern Ireland.

The Department and Managing Agent should also establish robust and consistent monitoring of the contractors on the list. This should ensure that works meet the

required standards and that appropriate action is taken if standards are not met, including the suspension or removal of contractors from the list where there is evidence of poor performance or non-compliance.

Accessibility should also be considered throughout the scheme's rollout, including how the list of registered contractors is communicated to households. Information should be available in accessible formats and through appropriate channels, so that all households can understand their options and make informed decisions.

Finally, we request **clarification** from the Department on how delivery of the works will be coordinated where multiple contractors are required to install different measures in the same property. In particular, it would be helpful to understand who will be responsible for coordinating communication between contractors, sequencing the works and overseeing the overall delivery of the project. We recommend that the Managing Agent has a clear coordinating role in these circumstances to ensure clear delivery for the household and effective communication between all contractors involved.

To work on the Warm Healthy Homes Fund, a contractor must be VAT-registered, be registered with the Managing Agent to work on the Warm Healthy Homes Fund, and be accredited to a relevant trade body, including:

- Gas Safe (**must** be gas safe registered to install gas appliances)
- NICEIC (Electrical work)
- British Board of Agrément (BBA) (Loft, cavity wall, solid wall)
- Solid Wall Insulation Guarantee Agency (SWIGA) (Solid wall)
- National Insulation Association (NIA) (Loft, cavity wall)
- Cavity Insulation Guarantee Agency (CIGA) (cavity wall).
- Microgeneration Certification Scheme (MCS) (small-scale renewable energy systems)
- Installation Assurance Authority – (single compliance platform)

The proposed approach reflects current practice across government-funded energy efficiency schemes and is intended to provide assurance on quality, consumer protection and technical competence. As the Fund develops, it is proposed that

contractor standards would align with those used in other government schemes, which may include a transition to PAS 2030 and PAS 2035 standards or similar.

Question 8

Do you think that industry is ready to adopt or move to the principles of PAS 2030/2035?

☐ Yes

☒ No

If you answered No, please give reasons for your answer limited to 500 words.

Our understanding is that much of the Northern Ireland industry is not currently ready to fully adopt PAS 2035. However, the sector can and should move towards this. As the Warm Healthy Homes Fund represents significant public investment and major works to people's homes, it is appropriate to require high standards.

It is important to distinguish between the two standards. PAS 2030 relates to the installation of individual energy efficiency measures and is already widely used by the industry. PAS 2035 requires a whole-house, multi-measure retrofit approach, supported by appropriately trained personnel such as Retrofit Coordinators and Retrofit Assessors.

Our understanding, including from feedback shared during the Department's consultation events, is that while elements of PAS 2030 are generally considered achievable, there are concerns about the practical application of PAS 2035 in the current Northern Ireland context. Some coalition members with experience of delivering projects to PAS 2035 have highlighted the challenges involved. These include difficulties progressing because of the limited number of suitably trained and accredited personnel in Northern Ireland, including Retrofit Coordinators. This capacity constraint could create a significant bottleneck and lead to project delays in the Fund if not addressed.

However, the existence of these capacity challenges should not be used as a reason to delay the Warm Healthy Homes Fund. If a clear market signal is provided, such as the availability of grant funding, the industry is likely to respond quickly and build the necessary capacity and capability. A transition period may be required, although we would expect this to be measured in months rather than years. The Department should also consider supporting training and capacity-building, including through affordable training opportunities for roles such as Retrofit Coordinators.

A limited number of Northern Ireland contractors are already working to PAS 2035 in Great Britain, evidencing that capability exists within the market. However, further development of capacity is required locally. While it may be tempting to defer the adoption of PAS 2035 on the basis that the industry is not yet fully prepared, doing so risks missing a significant opportunity. Delivering retrofit through a whole-house approach is essential to achieving the best outcomes, and PAS 2035 provides the framework to support this. If we do not implement it, we risk undermining the effectiveness and long-term benefits of our retrofit ambitions.

We recommend the Department works with the Department for the Economy and industry to find a suitable solution and agree an appropriate transition pathway. It should also engage with the Sustainable Energy Authority of Ireland (SEAI) to learn from its experience of developing quality assurance frameworks for large-scale domestic retrofit programmes.

Question 9

Are there any other alternative standards or accreditations that may be applied to contractors working on all government energy efficiency schemes?

☒ Yes

☐ No

Please provide detail limited to 500 words.

The proposed accreditation framework is comprehensive. However, it should also include the Oil Firing Technical Association (OFTEC) for contractors installing or replacing oil heating systems. Home heating oil remains widely used across Northern Ireland. In some cases, an alternative heating system, such as an Air Source Heat Pump or gas, may not be technically feasible for the property or available. Therefore, where an oil heating system needs to be replaced, it is important that the Fund has registered contractors that hold OFTEC.

Alongside technical accreditation, we encourage the Department to consider the additional training needs of those who will interact directly with households. For example, mandatory energy awareness training should be considered for frontline staff of the Fund's Managing Agent. NEA NI's City and Guilds Accredited Energy Awareness (Level 3) course and NEA NI's Introduction to Domestic Low Carbon Renewable Technologies (Level 2) are ideal options. Furthermore, training on behavioural change would enable contractors and advisers to support households

in adopting new technologies and maximising the benefits of installed measures. This could be provided by NEA NI's CPD Accredited Changing Energy Related Behaviour training.

Finally, there must be alignment in accreditation and quality standards across all government energy efficiency and low-carbon heat schemes. A common framework for installer accreditation, quality assurance, aftercare and consumer redress would provide greater clarity for contractors, improve consumer confidence and support a more coordinated approach to retrofit delivery across Northern Ireland.

Proposal: Aftercare

It is proposed that initial aftercare advice will be available to all applicants. This will be a routine follow up between 6 and 12 weeks after installation to ensure that equipment is being used correctly and effectively. It is anticipated that the Managing Agent will instigate the aftercare by telephone to establish if a follow up visit is required. Should a visit be needed then the contractor who completed the works should visit the property to address any concerns or issues.

Question 10

Do you think that the proposed aftercare arrangements are sufficient?

☐ Yes

☒ No

If you answered no, please provide additional detail (limit of 500 words) on any additional aftercare that the Managing Agent of the Warm Healthy Homes Fund should provide.

The FPC NI considers the proposed aftercare arrangements to be insufficient. We are also concerned that there are inadequate arrangements to support households before and throughout installation.

Support should begin at the start of the customer journey. Households may need help understanding the measures being offered, completing applications, selecting and contacting contractors, and understanding what to expect from the works. The Department must also support access for digitally excluded households. We recommend that a freephone service is available for households to raise questions or concerns throughout the process.

A single follow-up telephone call 6-12 weeks after installation is insufficient, particularly where new technologies such as Air Source Heat Pumps (ASHPs), solar PV and battery storage have been installed. The performance and usability of some technologies, particularly ASHPs, can only be properly assessed over the various heating demands of multiple seasons. We recommend a more comprehensive model, including quarterly check-ins throughout the first year after installation, similar to the approach used under NISEP.

The Managing Agent should have a dedicated aftercare team that acts as the main point of contact for households and landlords. It should answer routine questions, escalate technical issues to contractors and coordinate the response. Households

should also receive a clear and accessible handover pack from contractors for each technology installed, including operating guidance, FAQs, fault codes, warranty information and links to explanatory videos.

The Voluntary and Community Sector (VCS) has an important role to play in supporting households throughout the process. The Managing Agent should work with experienced organisations to provide, or signpost households to, high-quality energy advice and other support as required. Trusted community-based organisations can provide independent advice, help manage expectations, support vulnerable households and reinforce key messages before, during and after installation. This could include advice on using new technologies efficiently, checking whether households are on an appropriate electricity tariff (particularly important for ASHPs), information about the Medical Care Register and Customer Care Registers, and warm referrals to independent advice for support with matters such as income maximisation. Drawing on successful approaches used in Bryson's Pathways to Net Zero and other retrofit programmes, and integrating VCS partners into scheme delivery, would improve customer experience, increase engagement and support better long-term outcomes.

Accessibility must be considered throughout the scheme. The Department and Managing Agent should work with organisations experienced in making schemes more accessible, including in the design of communications and staff training.

Aftercare should focus on household outcomes, not simply whether equipment is functioning. Follow-up questions should be practical, such as whether the home is warm and affordable to heat. Independent quality assurance, including periodic mystery shopping and customer satisfaction exercises, should also be used to monitor performance and drive improvement.

Finally, clear communication is essential to building trust. Good practice would include contractors providing households with clear timescales, information about who will visit their home and their roles, and photographs of works before, during and after installation. Comprehensive support throughout the customer journey is essential both to protect households and maintain confidence in the Fund.

Equality Considerations

Question 11

Please comment on any potential equality implications you feel may arise from the issues/proposals discussed in this consultation.

We have a number of further comments:

Firstly, equality of access and outcomes should be monitored throughout the lifetime of the scheme. The Department should collect and monitor appropriate data to understand who is aware of the Fund, who applies, who receives support and the outcomes achieved. This should help identify whether particular groups are facing barriers to accessing the scheme or are being unintentionally underrepresented. It should also include monitoring uptake and outcomes by location and identifying any practical barriers faced by households in rural areas. These findings, together with the wider monitoring of the Fund as it is rolled, should be reported transparently through the Warm Healthy Homes Strategy's annual progress reports and the annual Minister Statement on fuel poverty.

Secondly, we stress again the importance of accessibility being built into every stage of the customer journey. Information and communications should be accessible to those with varying communication needs. The Department and Managing Agent should work with organisations with relevant expertise to ensure that the scheme design, communications, staff training and delivery are accessible in practice. Contractors should also have appropriate information about the needs of the households they are visiting, where appropriate and with the consent of the householder, to avoid preventable communication barriers.

Thirdly, the coalition recommends that the Department reconsiders the Section 75 screening decision and instead does subject the Fund to an Equality Impact Assessment (EQIA). We recognise that the Department has completed a Section 75 screening exercise and identified a range of mitigating measures, particularly in relation to the proposed eligibility criteria. However, many of the equality issues identified by coalition members relate not only to eligibility, but also to the practical delivery of the Fund. A full EQIA would provide a more comprehensive assessment of how Section 75 groups may experience the full customer journey. It would further assist to identify barriers to participation, inform the design of accessible communications and customer support, and inform the training needs for the Managing Agent and frontline staff. This would complement the Department's commitment to monitor the scheme and help ensure the equality considerations continue to inform delivery as the Fund develops.

Fourthly, we also ask the Department to consider the position of social housing tenants. The Fund is proposed to focus on owner-occupiers and private renters, meaning that social housing tenants who may meet the other eligibility criteria could nevertheless be excluded because of their tenure. We recognise that other government initiatives may be intended to support the social housing sector. However, this should not be assumed to mean that there are no equality implications. The Department should clearly assess whether social housing tenants, including Section 75 tenants, have equitable access to energy efficiency support.

Finally, some coalition members have raised concerns about the proposed focus on Air Source Heat Pumps (ASHPs) as the primary heating measure. We recognise that the consultation proposes installing ASHPs only where the Home Assessment has determined that it is technically feasible and economically viable to install one. However, further **clarity** is needed on how these decisions will be made and how the scheme will monitor and ensure that heat pump installations improve, rather than worsen, the affordability of heating for households experiencing fuel poverty. This is particularly important in Northern Ireland, where the absence of smart meters and smart tariffs, and high electricity prices, currently limit the potential economic benefits of heating using electricity.

We recommend that the Department considers recent research on how to ensure heat pumps work effectively for fuel-poor households, including evidence on the experiences of low-income households transitioning to low-carbon technologies. Recent research commissioned by the UK Government's Committee on Fuel Poverty found considerable variation in heat pump performance and household experiences in England⁶. While some households experienced warmer homes and affordable bills, others faced higher energy costs, system faults and significant financial and emotional stress. An additional consideration for NI is the high prevalence of keypad electricity meters. This reinforces the need for comprehensive education and ongoing support where heat pumps are installed, to help households budget effectively to avoid unintentional self-disconnection, which may lead to higher running costs.

The Department should consider these research findings when finalising the Warm Healthy Homes Fund and determining the requirements for the Home Assessment. This should include consideration of minimum commissioning standards, clear and practical handover guidance, structured post-installation support, performance monitoring and effective arrangements for addressing underperforming systems or faults. The research also highlights the potential benefits of solar PV and battery

⁶ Committee on Fuel Poverty, (2026). *[How to ensure a successful transition to heat pumps for households at risk of fuel poverty.](#)*

storage in reducing electricity costs alongside heat pumps, so we welcome the inclusion of these measures in the Fund's proposals.

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