RISE | Retrofit information, support & expertise

Trustmark Roundtable FAQs

RISE Discoveries

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Introduction

This document contains the frequently asked questions (FAQs) from the Trustmark Roundtable which took place on the 28th of October 2026. These cover a range of topics including quality assurance, audit, lodgement and PAS 2035.

FAQs

What should the timeframe be for lodging measures after installation is completed?

For smaller projects, TrustMark recommends lodging within 20 days of installation completion. However, for larger or longer-running programmes, measures should be lodged in stages as they are completed rather than waiting until project close-out. This reduces risk, allows issues to be corrected throughout delivery, and avoids problems arising from expired certifications or missing evidence. The 20-day recommendation is linked to Building Regulations notification requirements, as many measures require notification through a Competent Person Scheme, which can take up to 30 days to process.

How does TrustMark select projects for audit?

TrustMark uses a risk-based audit model rather than auditing a fixed percentage of projects. An automated AI analytics platform reviews up to 150 data points, checking information such as pre- and post-installation data, EPC records, retrofit assessments, retrofit plans, property type, project complexity, measure combinations, funding type, and business audit history. These factors generate a risk score which determines whether a project is selected for audit. A "risk radar" is also used to identify geographic and project-related risk clusters across the UK to target auditing resources effectively.

What is TrustMark's quality assurance process? Do they check a fixed percentage of projects?

No. TrustMark's quality assurance process is based on risk profiling rather than a fixed audit percentage. Businesses, retrofit coordinators and projects are assessed against a range of risk indicators, with higher-risk projects receiving greater scrutiny. TrustMark also undertakes some random statistical auditing to validate and benchmark its risk model.

What are the most common reasons lodgements fail audit?

The most common causes relate to poor-quality retrofit assessments and designs. Typical issues include incomplete assessments, insufficient evidence, missing photographs, unidentified defects, defects shown in photographs but not

recorded in reports, lack of assessments of significance for traditional or protected buildings, and generic designs that are not property-specific.

TrustMark also frequently sees designs that fail to address defects identified during assessment, inadequate construction detailing, missing condensation risk analysis, and a lack of supporting calculations such as BS 5250 and fRsi assessments where required. Providing property-specific designs and complete supporting evidence significantly reduces audit failures.

How should project teams approach situations where PAS 2035 requirements are difficult to achieve?

TrustMark's position is that if PAS 2035 compliance cannot be achieved, the project should not proceed until the issues have been resolved. Some properties may require enabling works to address defects or suitability issues before retrofit works can commence. The assessment stage should identify these requirements. TrustMark focuses on whether the PAS process has been followed and cannot advise on funding decisions or project prioritisation.

How should teams deal with different interpretations of PAS 2035 requirements?

Where interpretation differs, the evidence should drive the decision-making process. The Retrofit Coordinator must ultimately be satisfied that the proposed approach is compliant because they are responsible for confirming compliance when lodging measures. Supporting evidence often resolves disagreements over interpretation.

How should grant recipients respond if an installer loses accreditation, receives sanctions or demonstrates poor performance during delivery?

Grant recipients should ensure robust contract management and regularly assess installer competence throughout delivery. If certification is lost, the relevant certification body should be engaged regarding the rectification process. TrustMark's role is limited in contractual matters, but it encourages early engagement where issues arise, as solutions become much harder once projects reach lodgement stage or funding deadlines. Effective contingency planning is essential to ensure delivery can continue if an installer becomes unable to complete the works.

How do TrustMark and MCS certification interact?

PAS 2035 requires that low-carbon technologies and renewable energy systems comply with relevant MCS standards. Designers responsible for specifying MCS measures must be appropriately qualified and work in accordance with MCS requirements. PAS 2035 points to MCS standards, although MCS standards do not always directly reference PAS 2035 in return.

What customer protection mechanisms does TrustMark provide?

The route depends on how the complaint is raised. Typically, concerns should first be directed to the installer or grant recipient. If TrustMark receives the complaint, it identifies the responsible installer and engages with the relevant TrustMark-registered business. TrustMark recognises that the current complaints landscape can be confusing for consumers and has been consulting on proposals to simplify complaint escalation routes, potentially creating TrustMark as a single escalation point for unresolved complaints.

Does TrustMark provide a matrix of evidence requirements for each measure?

Yes. TrustMark publishes a PAS 2035 structured retrofit data requirements document through the TrustMark Data Warehouse section of its website. The document outlines evidence requirements for assessment, project creation, lodgement, project completion and post-completion stages. It covers both PAS 2035:2019 and PAS 2035:2023 and identifies mandatory and optional evidence requirements. However, TrustMark emphasises that evidence quality is just as important as evidence quantity.

What evidence does TrustMark expect to demonstrate resident consultation and informed consent?

TrustMark does not prescribe specific evidence requirements beyond those already set out in PAS 2035 and other regulations, such as CDM requirements. PAS 2035 defines when and how residents should be engaged throughout the retrofit process, including during improvement options evaluation and project objective setting. The emphasis is on meaningful engagement, ensuring retrofit is done with residents rather than to them. Evidence should demonstrate that residents were appropriately consulted and involved in decision-making throughout the process.

Why does TrustMark collect project cost data during lodgement?

The cost information is primarily collected to support wider industry and government analysis rather than TrustMark's own assurance activities. The data can help organisations such as DESNZ understand project costs, funding allocation and delivery trends, supporting future scheme design and funding decisions.

Does lodging measures in stages create additional charges?

Yes, there may be additional charges associated with staged lodgements. TrustMark advised that these costs are relatively minor compared to the risks of waiting until the end of a project. At the time of the session, a project creation fee of £30 and stage lodgement fees of £15 applied. Staged lodgements also support supply chain cash flow and reduce the risk of certification or compliance issues affecting completed works.

Can a Retrofit Coordinator lodge measures under PAS 2035:2019?

New PAS 2035:2019 projects cannot be created. However, for certain schemes where extensions have been granted, existing PAS 2035:2019 projects may continue and measures can still be lodged in accordance with the relevant scheme rules. TrustMark recommends reviewing the guidance published on its website regarding PAS transitions and scheme-specific extensions.

Are evidence requirements applicable to measures that are not claimable under funding?

TrustMark views compliance from a whole-project perspective rather than purely funded measures. Evidence requirements should align with the intended outcomes and scope of the retrofit project, regardless of whether specific measures are claimable under a particular funding programme.

Resources

References resources:

Introduction to TrustMark

Getting Your TrustMark Lodgements Right

Supply Chain Advice Pack: PAS 2035 TrustMark Lodgement