PEPA Reponses to MHCLG EPC Call for Evidence Action Plan

In order to review and provide feedback on the draft Call for Evidence Action Plan, PEPA broke the document into key work streams, and assigned these to working groups.

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The below sections relate to the outputs of these working groups.

Methodology

Code	Timeframe	Description	Category
R8	Late 2020	We will introduce SAP 10.2, an updated version of SAP, which takes into account updated fuel prices, CO2 emissions and primary energy factors and includes monthly variation in these factors. This will refine the assumed heating pattern and summer internal temperature calculations. Other changes include changes to modelling of communal heating, revising solar panel self-use assumptions and allowing for battery storage with solar panels. An RdSAP update is likely to follow in mid 2021.	Methodology

PEPA is keen for a release of the methodology (and underlying Building Regulations) as soon as possible, and we should target this being no later than April 2021. This is to ensure that fuel process and carbon emission factors are brought up to date, for the most accurate outputs to be provided to the consumer.

Revisions between methodology versions should be every 3 years. However, the current version of SAP, was set in 2012, meaning a release cycle of double that or more. This is the same for non-domestic buildings using SBEM methodology. The methodologies should be kept up to date and current, to give as close to the right answer as possible when used.

The current methodology doesn't link into the government's desire/strategy to decarbonise the heat generation within buildings. SAP 2012 doesn't make electrical heating systems and heat pumps feasible in many designs.

Code	Timeframe	Description	Category
R9	Late 2020	We will review the changes needed for SAP 11, expected to be rolled out in approximately 2025, to make EPCs a more accurate measures of actual energy performance. This will include considering the potential role of SMETERs data in SAP.	Methodology

The EPC is essentially an asset rating of the building. It allows two buildings to be compared to each other without how that building is used (the occupancy).

Smart meter data should not be seen as the single solution to creating more accurate EPCs. The modelling is more nuanced. For example, it is accurate to say that actual energy usage from a previous incumbent is irrelevant to new occupant as it will not be accurate to their usage. Any change in occupancy or use of the building may radically impact on the outputs. Also, it is important to consider the time frames that are used – energy usage varies markedly between summer and winter months as the need for cooling, gives way to the need for heating. The current COVID crisis is another good example where typical usage (assumed and prior year actual) would not relate to current actual. However, by having the ability to gather the data on a large scale, the government and research institutions could use this to help with their modelling and understanding of energy use during such times.

PEPA strongly supports the correct use of Asset and Actual Energy Usage, gathered via an Occupancy Assessment and Smart meter data. PEPA feels that this combination will provide the consumer very useful information on how to improve their building(s), more accurate information on measure savings and make better, more informed choices.

PEPA feels that the EPC rating methodologies should remain as asset ratings, and this assessment is the right foundation to build upon and make good choices about the physical asset (the home or business premises). These modelling methodologies should allow for and be compatible with 'Occupancy' modelling and Usage data, effectively creating a EPC plus DEC, which can bring a balanced view of the buildings performance based on both the asset and the occupants behaviour within it.

Code	Timeframe	Description	Category
D7	Late 2020	We will review the necessary changes to the EPC register required to allow EPCs to be updated following changes to the property. In particular we will investigate storing on the EPB register SAP input data gathered during the EPC survey, including necessary data protection policies. This is a necessary first step for creating a more flexible EPC system and allow EPCs to be updated in response to changes in a building.	Methodology

There are some real benefits to making the input data of EPCs available on the register, but care is needed to ensure this is only available to the right parties.

Ultimately, if data has been added, QA'd and can be peer-reviewed against suitable evidence, then it is good data and can be reused. The reuse of good data improves repeatability and accuracy. We should

look at the Data Warehouse or creation of a property passport – need to define this term and what it is. Many solutions are coming to market but it needs to a single 'thing'.

We need to move toward the ability to reuse confirmed and correct evidence to avoid repeating a process –

- U-values
- Air test certificates
- Psi Values
- Floor plans?
- Insulation installed by a CPS Installer
- Makes and models of technologies installed e.g. boilers, heat pumps, solar panels, PV, controls, etc

There are some considerations;

- How long does data remain 'good' for?
- Evidence for the data is really needed to ensure that data is good – in theory, the register or other source will need to hold this evidence so it can be checked by another assessor or scheme
- There needs to be a method of schemes to show that data is good – Psi value and u-value calculations are some examples where a 'register' of this data which has been quality assured would mean that this data could be used in future assessments.
- SAP data doesn't current derive from an onsite assessment of any kind. For the reuse of SAP data, we should always consider the introduction of some kind of onsite inspection aspect.
- Insurance considerations are key here as well, as we need to understand who is ultimately responsible for the accuracy of the data that may be reused.
- Methodologies should be updated in line with available data elsewhere – for example RdSAP should be able to use pressure test data as this is now becoming more widely available.

Code	Timeframe	Description	Category
D9	Late 2020	As part of the EPB register redevelopment, we will consider potential pathways for including SMETERs in RdSAP (looking ahead to the conclusion of the SMETERs innovation competition in March 2021) and the legal, data access and quality assurance processes which may be necessary. We will consider how the transition to such an approach might be managed and what the impacts would be on other aspects of the EPC system.	Methodology

Similarly, to the points made for R9, Smart Meter data will be highly useful, but in conjunction with an onsite assessment, completed by a competent assessor, who can both produce an asset rating of the building and consider and interpret the occupancy and usage data and outputs. This is particularly important if this 'three pillars' data set is to be used for energy efficiency initiatives, funding or financing.

Methodology Impacts on EPC Changes

Below are sections relating to how methodology can impact on changes to the EPC. There is some natural cross over between these two subject areas.

Code	Timeframe	Description	Category
R2	Summer 2020	As part of the EPC register redevelopment, we will consider how consumer information around EPCs can be improved and the necessary limitations of the process better explained, for example by providing a walkthrough of the EPC process and an FAQ section.	Methodology and EPC Changes

PEPA has examined the current EPC and proposed a number of changes to the format and function of what a future EPC may look like and perform – see separate section of this document.

In addition, and to complement that work group, the methodology working group would like to highlight the following;

There is a need for better terminology that is understood by the end user/consumer – using 'as built' 'unknown' and the use of 'assumed' means different things to different people, and often raises questions and complaints. PEPA prefers the use of terms such as 'Unable to assess on site' for example.

Code	Timeframe	Description	Category
C8	Late 2020	We will review EPC recommendations, which will include the ordering of recommendations and to potential to make recommendations more tailored to the individual property. Better information on the limitations of the EPC and where to go for future advice will be provided. This will also include better information on the potential effects of energy efficiency measures on ventilation, damp and overheating, as well as the suitability of recommendations for older properties or those in conservation areas.	Methodology and EPC Changes

PEPA feels that there must be a review of Appendix T as part of review of the RdSAP methodology. The current version of Appendix T came into effect in 2012 and priorities for government are changing quickly, e.g. there is now a greater focus on decarbonisation of heating, either via heat pumps, or swapping gas and oil boilers to electrical heating systems (now the carbon factors for electricity have reach near parity with that of gas).

PEPA also feels there needs to be an equivalent to Appendix T for SAP and NCM.

There should also be focus on how standardised measures in RdSAP can be modified;

- Alternative measures should be made more visible, with better information for the consumer – The ability to see the impact of increasing insulation thickness, or location would be beneficial.
- Additionally, RdSAP measure costs should be more reflective of the property – by performing an RdSAP assessment, the wall area can be derived. If we know the wall area, we can make the cost of Solid Wall or Cavity Wall Insulation more accurate.

- Measures that can affect the ventilation rate of the property, such as solid wall insulation, should be highlighted on the EPC, and these recommendations should also refer to the likelihood of need to improve the ventilation at the property
- Listed buildings or buildings in conservation areas should be declared on the EPC and that certain measures may not be possible due to planning constraints.
- The ability to move or reprioritise measures and produce a bespoke recommendations report from an EPC should be considered.

Code	Timeframe	Description	Category
C13	Late 2020	We will look at how the existence of a smart meter and other smart technologies can be reflected on the EPC to better inform users and provide additional information about the features of a property.	Methodology and EPC Changes

Smart technology needs to be defined. In the world of energy efficiency, a smart technology is something that creates tangible and measurable savings in energy use or improves efficiency.

Smart meters and smart controls alone do not do this, in some circumstances, these can increase energy use, as the consumer has more convenient control over the system (i.e. turning the heating on before getting home). However, there also benefits to energy saving, but it depends on how the system is used. PEPA considers these internets connected systems. The benefits are accessibility, convenience and useful real time data.

Internet connected systems, that have a benefit of convenience or comfort, but not necessarily in energy efficiency or carbon reductions should be available in the EPC methodologies – such as smart controls. These should be noted on the EPC for the consumer to understand. Indeed, they may be reflected on an asset rating, they can be explained and encouraged on the 'occupancy assessment', and then the understood their impact in the 'metered' data.

EPC Changes

Below are sections relating specifically to changes to the EPC. There is some natural cross over to methodology.

Code	Timeframe	Description	Category
R2	Summer 2020	As part of the EPC register redevelopment, we will consider how consumer information around EPCs can be improved and the necessary limitations of the process better explained, for example by providing a walkthrough of the EPC process and an FAQ section.	EPC Changes

Code	Timeframe	Description	Category
R7	Late 2020	We will investigate whether it is possible to make available in an annex to the EPC the additional information used for calculating the EPC, such as installed measures, so that property owners can sense-check the EPC more easily	EPC Changes

C6	Mid 2020	As part of the EPB register development, we will move to an improved presentation of EPC data online which provides data as a URL instead of the current PDF, whilst still providing for a robust offline process to enable legal copies of EPCs and to ensure accessibility for all consumers. This new presentation will present the most important EPC information upfront and allow interested consumers to drill down into further levels of detailed information where relevant	EPC Changes

C8	Late 2020	We will review EPC recommendations, which will include the ordering of recommendations and to potential to make recommendations more tailored to the individual property. Better information on the limitations of the EPC and where to go for future advice will be provided. This will also include better information on the potential effects of energy efficiency measures on ventilation, damp and overheating, as well as the suitability of recommendations for older properties or those in conservation areas	EPC Changes

C10	Mid to Late 2020	We will continue to make further improvements to the Simple Energy Advice website, including the facility to model how retrofit works would affect the EPC rating, subject to consumer research	EPC Changes

Code	Timeframe	Description	Category
C11	Late 2020	We will improve the presentation of cost data on the EPC, including presenting energy costs over 1 year instead of 3 years, but will also include more details of the non-financial benefits of energy efficiency measures, such as improved comfort and health	EPC Changes
C13	Late 2020	We will look at how the existence of a smart meter and other smart technologies can be reflected on the EPC to better inform users and provide additional information about the features of a property	EPC Changes
C14	Late 2020	We will carry out consumer research to inform more comprehensive changes to the EPC format in the future. We will investigate the use of behavioural change insights to nudge consumers to make changes that benefit them	EPC Changes
D8	Late 2020	We will consider additional information that consumers may want to access to inform decisions around improving their property and how this can be linked to the EPC register and the Simple Energy Advice service to form a coherent data infrastructure	EPC Changes

Recommendations

These recommendations apply to both existing dwelling EPC (based on RdSAP) and non-domestic EPCs (based on SBEM)

At a top level we propose that a methodology should deliver one mandatory output and two optional outputs all accessed from the Home Energy Portal. (Non-domestic portal could be called the Building Energy Portal)

Mandatory

1. An EPC that presents the predicted energy consumption of a building (the "asset") based upon standard occupancy profiles to allow direct comparison of similar buildings

Optional

2. In addition, an Occupancy Assessment that calculates the predicted energy consumption of dwelling based upon the people living in the building. – RdSAP only.
3. In addition, an Energy Usage Report that compares actual energy consumption with the predicted energy consumption and benchmarks with similar buildings. Long term this could be updated automatically produced using smart meter data.

All outputs should:

- To preserve the links to minimum energy efficiency standards, and other fuel poverty focussed initiatives, the primary measure should be "energy cost" on an A-G scale and referred to as an

"Energy Cost Rating" – For non domestic the primary measure is to be retained as carbon emissions.

- Present energy efficiency in terms of Energy Cost, Primary Energy and Carbon Emissions in a 'food labelling' style.
- Breakdown usage by type e.g. space heating, lighting and water
- Be accessed through a Home / Building Energy Portal which is also an online resource with signposts to energy advisors, retrofit coordinators (PAS 2035) and installers (PAS 2030).
- Include a printable summary "Certificate" should be provided as a record of legal compliance.

To improve access:

1. The PDF "Certificate" should be accessed direct from the Property Portal and the "Certificate" refers back to the portal. The Certificate should be succinct but not so brief that key messages (ratings, recommendations and next steps) are lost
2. The Home Energy Portal, and all that it contains and links to, should be written in consumer-friendly style
3. Suitable warnings should be given about the purpose and limitations of the energy assessment.
4. Stakeholders (such as agents) should link to the properties portal, not the PDF or the graph
5. An EPC is either valid, replaced, expired or not for issue. Only Valid, Expired and Replaced EPCs would be publicly available.

To improve content:

6. Energy costs and savings should be presented as "£ per year"
7. Descriptions of existing features, such as the existence of a cavity wall, should be simplified so to give an indication of construction, rather than suggestion that it is a definitive statement of fact.
8. Floor areas should be described as 'approximate'
9. All properties should be required to have an EPC, but a warning should be applied to properties of historic interest to check with the local conservation officer before attempting improvements. The energy portal should ink to existing registers of such buildings.
10. An EPC should be valid for three years unless the property is extended or there Is a change to, or installation of, a "controlled fitting" or "controlled service". Where this service / fitting is completed by a Competent Person the property should be reassessed (which is required in some instances) but alternatively the originating assessor may update the existing assessment without the need for a further site visit but using the Installation Certificate as evidence. The resultant certificate should expire on the same date as the original on which it was based.
11. The FAQ section of the Home Energy Portal should be written using consumer focussed language
12. Government should collate all sources of trusted independent advice and signpost to it
13. The EPC should avoid industry speak such as "as built ", "assumed" and "default"
14. The cost of recommended measures should be reviewed regularly and estimated based upon building size
15. The benefit achieved from the installation of measures should be stated both individually and cumulatively.
16. Clear instructions should be provided to the consumer about what they should do if they believe the EPC is in error (i.e. complaints process directed to the accredited energy assessor in the first instance). The accreditation scheme details should be included on the EPC as part of the escalation process for complaints
17. A link should be made to detailed terms and conditions which explain any duty of care (and limitations) that might exist.

18. The online EPC should include access to all the RdSAP variables (inputs and defaults) to help identify the source of possible errors. – RdSAP only

To improve usefulness:

19. Methodology conventions should be published to allow interested readers to understand the rules that impact upon the calculation and the resultant EPC
20. The recommendations on the portal and the EPC should link to generic guidance and further link to accredited PAS 2035 Retrofit Advisors, Assessors and Co-ordinators, and PAS2030 Retrofit Installers. When available, reference PAS 2038 for non-domestic buildings.
21. Energy assessors, consumers and others who advise the consumer, should have access to a replacement for the EPC Advisors Tool that allows the assessment to be recalculated based upon the people living in the building and to remove and reorder the recommendations. – RdSAP only
22. The Home / Building Energy Portal should include other energy related advice such as switching suppliers
23. The assessment should include an option to switch fuels – SBEM already does.
24. The assessment should capture the presence of smart meter technology and the portal report this back to the consumer
25. The assessment should not attempt to assess the impact of energy consumed for reasons other than space heating, hot water and lighting, such as that consumed by electric vehicles. The portal should make that clear
26. Adequate investment in the methodology is required to consider the impact of smart energy efficiency devices (such as controllers and battery technology) but where that improvement is unproven then its presence should be acknowledged.
27. The occupier should be encouraged to undertake an Occupancy Assessment (from the energy assessor or via the publicly available tool) that will tailor the recommendations and estimates based upon the occupier and their lifestyle – RdSAP only

Triggers

Code	Timeframe	Description	Category
C3	Spring 2020	We will publish a consultation on setting requirements for lenders to support homeowners to improve the EPC ratings of properties they lend to. This will include proposals that encourage lenders to improve the energy performance information they hold on their portfolios, for example by requesting up-to-date EPC information at the point of (re)mortgaging. The consultation will also seek information on how government or lenders could improve consumer awareness of EPC information.	Triggers

PEPA welcomes this proposed consultation and believe that lenders have an excellent opportunity to encourage building owners to improve their property. This is closely aligned to the Bank of England's intended obligation on lenders to manage and report the sustainability of their lending book.

Code	Timeframe	Description	Category
C15	By end 2021	We will investigate the practicalities of introducing a requirement for a new EPC to be produced when renovations occur to a property and how this might tie in with planning permission or building control. This will be considered in relation to the forthcoming building regulations consultation, regarding the potential for wider energy efficiency improvements alongside notifiable works.	Triggers

PEPA welcomes this proposal. We believe not only should an EPC expire three years after its issue there should also be a requirement to update the EPC whenever there is a material change to the building (such as an extension) or following the installation of a controlled measure or service. This will ensure that consumers get best advice and it will ensure that Government is accurately estimating carbon emission from dwellings, taking full account the marginal improvement that happens to all buildings throughout their lifetime for example when broken boilers are replaced with more efficient modern equivalent.

Code	Timeframe	Description	Category
C16	By end 2021	We will consider the advantages and disbenefits of reducing the validity period of the EPC from 10 years to a shorter period and how that could work in tandem with other possible changes to require a new EPC when renovation or improvement works are carried out.	Triggers

PEPA believes that using an EPC that includes cost estimates based upon old data is misleading and may even be considered misrepresentation. PEPA believe that a three-year validity period is a good compromise and can take account of even the most protracted sales process. The average tenure of an owner occupied property is over 20 years meaning that, if we rely on the current "placed on the market for sale" trigger, less than half the properties will not have a valid EPC at any moment any time.

Data

Code	Timeframe	Description	Category
D1	Spring 2020	We will publish an extended Open Data dataset which will include additional data fields permitted in the regulations; and we will be building on this to provide improved access to data through the redevelopment of the EPB Registers.	Data

PEPA welcomes the further opening up of data which will help all stakeholders get maximum benefit from this valuable resource.

Code	Timeframe	Description	Category
D2	Early 2020	We will update the Simple Energy Advice website to link to the TrustMark website for finding accredited installers and improve the ability to link to financial assistance provided by Local Authorities and energy suppliers under ECO.	Data

PEPA welcome the shift of energy advice from the Trustmark portal

Code	Timeframe	Description	Category
D3	Mid 2020	We will improve the signposting from the EPB register to other relevant information to consumers, such as the Simple Energy Advice website for further advice, the TrustMark portal for information on trusted tradespeople and the PRS exemptions register for checking legal compliance.	Data

PEPA welcomes the proposal that the register signposts to the quality, independent, energy efficiency advice.

Code	Timeframe	Description	Category
D4	Early-Mid 2020	TrustMark will launch the new consumer-facing Property Hub for the Data Warehouse, which will allow property owners to access a 'logbook' for their property showing works which have been carried out through the government-endorsed TrustMark scheme. We will investigate the potential to link this new database to the EPC register	Data

PEPA believe that the EPC register should be separate to the Data Warehouse but believe that linking the two, such that the Data Warehouse can access the latest EPC is a positive move.

Code	Timeframe	Description	Category
D5	Summer 2020	We will transition to a new EPC register. As part of this transition we will make the following improvements Improving addresses on EPCs to include, where possible, OS UPRN numbers to allow EPC register data to be compared easily with other government owned datasets Providing a service similar to the current Open Data access to large EPC datasets, but allowing real-time data to be accessed rather than data being updated retrospectively as is currently the case with Open Data (subject to data protection considerations) Being more responsive to data requirements. As the keepers of this data resource, we will be able to react quickly to changing requirements for data us within the bounds of data protection requirements.	Data

PEPA are very supportive of the new register and are excited by the opportunities this new platform will bring. Allowing open data to be updated in real time, and making use of the Ordinance Survey unique property reference number will maximise usability with others in the property industry.

Code	Timeframe	Description	Category
D6	Late 2020	We will consider how to resolve the status quo where an individual has opted out of having their EPC data shown on the public register as this is displayed as no EPC existing, rather than showing that an EPC exists but is not displayed, which could be misleading when properties change hands. This will require consideration of data protection requirements.	Data

PEPA believes that the an the owner of a property, or its occupant, cannot be identified from an EPC it need not be an issue under GDPR and therefore, other than for reasons of personal protection or national security, all EPCs should be in the public domain without an ability to opt out.

Legislation and Enforcement

Code	Timeframe	Description	Category
R1	Summer 2020	We will improve data processes as part of the EPC register redevelopment to enable EPC enforcement authorities to **better identify non-compliance** and enable better identification of input errors in EPCs.	Legislation and Enforcement

New register provides an opportunity to move forward and improve smart audit calling in the Non-Dom area.

Assuming input data to be visible to all.

Code	Timeframe	Description	Category
R5	[Autumn 2020]	We will consult on options for the Introduction of a new operational ratings scheme for non-domestic buildings which builds upon DECs which are required in some public non-domestic buildings.	Legislation

Assume you mean introduction of a new requirement for wider use. Nothing fundamentally wrong with existing, but benchmarks could be updated. Opportunity to strengthen MEES with additional minimum OP rating. Allow technology alternative as many data collection systems provide live operational rating data. DECs are an annual snapshot.

Code	Timeframe	Description	Category
R11	[By end 2020]	We will **review the penalties for EPC non-compliance** so that they incentivise EPC compliance and consider options for improved enforcement.	Legislation and Enforcement

Bigger penalties only effective if enforced. Could PEPA have legal enforcement powers? (See other groups' feedback).

Code	Timeframe	Description	Category
R12	[By end 2020]	We will investigate ways to **improve EPC compliance through working with other actors** such as mortgage lenders, lettings agents and EPC enforcement bodies.	Legislation and Enforcement

And PEPA? (See R11)

Legislation & Enforcement

Code	Timeframe	Description	Category
C2	Spring 2020	[We will consider changes to the EPB regulations which would **improve compliance with Minimum Energy Efficiency Standards in the Private Rental Sector** - Reducing or removing the 7- and 21-day periods that rental properties may be advertised without an EPC, making it a requirement that an EPC is produced before a rental property is advertised - Alter the regulations so that a valid EPC must be in place at all times while a property is let to a tenant, in order to resolve a discrepancy with PRS regulations over the treatment of lease renewals and extensions, where current EPC rules would mean some properties stop being covered by PRS regulations due to an expired EPC	Legislation and Enforcement

No issue with this except to remove not reduce.

Code	Timeframe	Description	Category
C4	Mid 2020	We will **clarify EPC guidance** around two issues that have been raised in relation to PRS minimum standards - Highlighting the existing powers possessed by Local Authorities to delegate responsibilities to other local authorities, either upper or lower tier, under Section 101 of the Local Government Act 1972, which could help to resolve concerns around EPC and PRS enforcement not being aligned in two-tier authorities. - Making clear that where Houses in Multiple Occupation (HMOs) have been created since 2008 (when the requirement for an EPC was introduced), the whole building is legally required to have an EPC. Additionally, we will investigate what proportion of current HMOs were created before this date and are currently not legally required to have an EPC.	Legislation and Enforcement

PEPA is supportive of this work - there is detailed work that does need to be done.

Code	Timeframe	Description	Category
C5	Mid 2020	We will look into **legal clarity issues which have been raised by stakeholders** as confusing in relation to Private Rental Sector Minimum Energy Efficiency Standards, such as listed buildings, lease renewal, shell and core buildings and 'not for value transactions.	Legislation and Enforcement

PEPA view is that listed buildings require an EPC. Improvements subject to caveats. Not sure what shell and core issue is, unless they mean empty stripped out buildings. (This is not shell and core). EPC Conventions deal with stripped out buildings.

Code	Timeframe	Description	Category
C12	Late 2020	We will include **more up-to-date information about government policy** which relies on an EPC rating, such as the current minimum energy efficiency standards for the private rental sector and government EPC targets. We will continue to review this information to ensure it remains up to date	Legislation and Enforcement

PEPA is supportive of this aim. PEPA are currently working on guidance documentation for schemes relating to MEES, specifically around the provision of information for improving rental sector buildings and exemptions reporting. PEPA believes this will help drive standards and customer expectations in this area.

Additionally, it is key that any new future use for the EPC is done so in collaboration of PEPA members, to ensure that the industry understands any considerations and impacts on energy assessors, and the EPC.

Quality

Code	Timeframe	Description	Category
R3	Late 2020	We will investigate how **improved quality assurance can improve EPC reliability**. In particular, we will look at evidence for the effectiveness of smart auditing processes which were introduced in 2017 and consider ways in which these can be improved further	Quality

Smart auditing - Domestic side repeating benefits

Commercial - More informed rules and so directly tackling the issues arising-non-domestic rules are uninformed as they only look at high and multiple lodgement, once we have access to the data for those reports, we can assess what we can audit against, like the use of defaults etc

What data can we access? The new Register should mean that there is easier access to data. Future development with new Register looks promising.

Assessors need to be educated further on how to enter the data.

Could there be further uniformed validation rules prior to lodgement to prevent mistakes.

Extra soft surveillance - helps to inform assessors of mistakes that would be picked up by a trigger - form of education to prevent future problems. Are there other ways to do pre and post lodgement auditing? How is pre-lodgement checking documented for inclusion in overall surveillance checking.

Code	Timeframe	Description	Category
R4	Mid 2020	We will conduct a **review of requirements for EPC assessor competence**, and work with assessor schemes to tackle poor performance of both assessor schemes, and assessors themselves, including strengthening assessor training, Continuous Professional development and testing requirements and reviewing the sanctions for poor EPC practice.	Quality

The NOS last updated in 2007 - should be re-written every few years - Assessors are different today than in 2007

CIBSE have to prove competency plus (min 21 hours annually)- should the minimum hours in SORs be increased and content defined to increase quality (informal/formal defined?) - should the timeframe be shorter?

The 2012 upskill filtered out assessors that were less interested in progressing in the industry (a natural reassessing pause) and provided those trained with a renewed motivation - could this be an option going forward for SAP10/ methodology changes and developed cross Scheme?- especially if the data collection/competency burden on assessors increased

Sanctioning processes do not work if they don't go hand in hand with a reward system – consistency of the system.
One key question to ask what the ultimate objective of the sanctioning system is? If it is to rid the industry of poor performance, the maintenance of a relatively high auditing failure rate would show that poor performance isn't being addressed by the current system. If the point is to act as a deterrent, why can Schemes ignore some suspensions and not others? Why can a Scheme elect to accept an Assessor that another Scheme has struck off?

There is a lot low-level bad practice from Energy Assessors that cannot be effectively dealt with by the Schemes, however there are a number of options which could be investigated.
A change to a more licence-style of accreditation with regular competency checks at major methodology changes opens itself to having a points-based sanctioning system. A successful example would be SEAI in the Irish Republic, but this benefits from the relatively small pool of assessors - scaling this up to a suitable solution of England & Wales would pose interesting questions. While the SEAI points matrix is extensive and prescriptive, there things that could easily be assimilated into a solution to EAW.

Code	Timeframe	Description	Category
R10	Late 2020	We will consider the case for putting in place a **formal error reporting system** for the EPB register, EPC assessors, consumers, Ofgem and assessor schemes to flag up incorrect or fraudulent EPCs and have them investigated. Issues raised could also be fed back into the smart auditing process.	Quality

Error reporting and national trading standard body working with Trustmark? Separate from Local Authority - take responsibility away from LA. Lodgement fee went up for compliance - extra 50p on lodgement fee specifically for compliance - EA increase their prices - interlinked with R13. Energy Assessors would happily endorse such a funding mechanism if they were able to see the tangible effects of enforcement and greater acceptance of their role and work.
Ensuring that any sort of feedback mechanism always refers queries, in the first instance, to the Energy Assessor; if this is unsuccessful, the mechanism can extend to asking further questions on the issue to go back to the relevant party.
MHCLG can collect data - nature of error- patterns types on complaint
If an EPC is removed from the Register there could be a flag to show it was used for an application with Ofgem- further action could be taken and parties informed.

Code	Timeframe	Description	Category
R13	By end of 2021	We will **consider options for improved oversight and accountability** of the whole EPC system to deal with quality, compliance, and potential gaming and fraud issues in a more comprehensive way. This will include reviewing the quality assurance regime and considering new measures to improve EPC fraud detection and prevention. One option could be to fund a National Trading Standards body to oversee EPCs, as is currently done for other trading standards issues.	Quality

Risk based effective if done correctly, non-domestic we don't have the data - how do we tell its effective? Are we doing enough? Do we increase 2% with soft auditing?
There are a number of surveillance activities which schemes undertake which help to reduce risk and ensure the quality of EPCs.
If Schemes are able to demonstrate this effectively, should they still need to select 2% for audit; conversely, just amending some bad data would likely prevent risk, but miss other issue which would produce a defective report.

Code	Timeframe	Description	Category
C1	Ongoing	We will ensure that the EPC is **accurate and may be relied upon for use in other government policies** which are designed to drive consumers to act, recognising that the EPC certificate alone is often unlikely to change behaviour. Part of the redevelopment of the register includes moving the service onto gov.uk URLs, meaning that we become the authority on EPC data.	Quality

How can you ensure an EPC is accurate?
How will the new Register differ from Landmark and how will it educate Consumers in understanding an EPC and its uses.

Code	Timeframe	Description	Category
C7	Mid 2020	We will consider what **additional training requirements** would be needed for assessors in relation to heritage buildings, ventilation, damp and overheating	Quality

(it's not in methodology - damp not assessed in RdSAP, NCM etc - more of a PAS thing)

Commercial Assessors have a better idea of understanding improvements.

SORs

Code	Timeframe	Description	Category
R6	Late 2020	As part of the EPB register redevelopment, we will improve the existing assessor registration process to ensure unique assessor registration numbers and prevent multiple records. This can help to identify errors where assessors who are suspended or have been removed from the register by an assessor scheme are registered to more than one scheme. This will prevent EPC assessors who are banned from practising under one accreditation scheme from switching to another scheme to continue working.	SORs

The SORs already require all accreditation schemes to share information about suspended and revoked members and has obligations on the schemes to take appropriate action. We believe that this has done a lot to raise the credibility of energy assessors and to level the playing field for those that obey the rules. We support MHCLG with the new register and the introduction of a UPI (unique person identifier) which will make this process more elegant and also may give the schemes the opportunity to monitor energy assessors who may be tempted disguise bad practice by splitting lodgements across accreditation schemes.