



External Review of Building Energy Rating – Key Quality Assurance Mechanisms

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LBS Partners

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Terms of Reference

Undertake on behalf of SEAI an external review of Building Energy Rating's (BER) key mechanisms including

- The Quality Assurance and Disciplinary Procedure (QADP)
- An external consultation process with key stakeholders including the BER Assessor community, BER auditors and BER Trainers.

BER / DEC assessor competence and registration

- Registration Requirements
- Training Courses
- National BER Exam

BER / DEC Assessor Code of Practice and governance

- Governance
- Independence
- BER-Assessor-Code-of-Practice
- Declaration of interest

Quality assurance and auditing of BERs / DEC and BER / DEC assessors

- Audit selection process,
- Audit rates,
- Audit methods and
- Resulting sanctions
- Quality-Assurance-System-and-Disciplinary-Procedure

Deliverables

- Review of existing mechanisms
- Comparisons with other Member States
- Recommendations
- Roadmap

Chapter 1 Executive Summary

The review identified Seven Key findings. The key findings and key Recommendations are listed below:

#1

Finding

- Exam effectiveness is limited and not conducive to learning

Recommendation

- For Domestic assessors remove the need for the exam and use the QQI Level 6 as the registration requirement. Any differences between the exam and QQI Level 6 [6N0732] should be incorporated into 6N0732
- For Non - Domestic assessors remove the need for the exam and develop a mandatory training course for new entrants

#2

Finding

- Huge appetite and need for CPD

Recommendation

- Shift focus from exam to workshops & mandatory CPD

#3

Finding

- Need for QA check is acknowledged to maintain standards but QADP perceived as a Punishment system and is driving a Climate of Fear
Climate of Fear also driven by how the QADP is implemented Vs Qty of Audits

Recommendation

- Move from a punishment ethos to a learning ethos
- Change tone of communications from legalistic, confrontational to simple supportive

#4

Finding

- International review uncovered a progressive approach to auditing. Move focus to Audit process versus Audit results

Recommendation

- Introduce mentoring approach on Quality Audits

#5

Finding

- Poor lines of communication between Assessors and SEAI

Recommendation

- Need for a direct productive relationship with Assessor group
- Focus on increased collaboration and engagement

#6

Finding

- Relationship structure driving a low degree of stakeholder alignment

Recommendation

- Business Transformation required to align stakeholders around common/shared objectives
- Develop a Learning organisation approach. This approach coaches and enables the value adding members of the organization, in this case the assessors.

#7

Finding

- Scalability constrained by
 - The attractiveness of the Assessor profession and Assessor morale
 - Tools e.g. DEAP4

Recommendation

- Improve via reduced costs for the BER assessor and increased BER value
 - Increased standardisation, sharing of best practices, simplification of evidence requirements
 - Improve ease of use of DEAP4
 - Improve and promote the value proposition of the BER
 - Market the BER brand – SEAI & Assessors
 - Communicate linkage to Climate Action Plan

Chapter 2 Background

The Sustainable Energy Authority of Ireland (SEAI), plays a leading role in transforming Ireland into a society based on sustainable energy structures, technologies, and practices. Its key objectives are implementing strong energy efficiency actions, accelerating the development and adoption of technologies to exploit renewable energy sources, supporting innovation and enterprise for our low-carbon future, and supporting evidence-based response that engage all actors. The Building Energy Rating (BER) system is a key part of Ireland's implementation of the Energy Performance Buildings Directive.

It is noted that the new Climate Action Plan will require significant scaling. Also the most recent VOC (Voice of the Customer/Assessor) feedback has been poor.

The objectives of this review are outlined in the Terms of Reference.

Chapter 3 Methodology

The review utilised both Qualitative and Quantitative sources of data:

Qualitative	Quantitative
Assessor Interviews	International Benchmark (member states) data
Auditor Feedback	DEAP4 Workshop results feedback
Assessor written feedback	BER Assessor Annual Survey 2019
Webinar Feedback	Quality Assurance Process Audit Information
SEAI QA Review report	
SEAI Team feedback	

As the assessor community are the stakeholders who do most of the work it was essential to concentrate the review around their inputs. While we used available data we also undertook a consultative process which included

- Written Submissions from Assessors & Auditors
- Interviews with a cross section of the assessor community

We then reviewed all inputs

1. SEAI Briefing and explanation of the current processes
2. All written and verbal submissions
3. Data supplied by SEAI including
 - Sample desk, documentation and practice and audit data
 - International Comparison data
 - 2019 Assessor Annual Survey
 - BER QA Review document
 - DEAP4 Workshop Survey
 - Various forms, templates, etc

These inputs were then parsed and collated in a master feedback document with 74 individual feedback and a further 201 responses from the 2019 BER Assessor Annual Survey.

We reviewed the feed-back and categorised it under the following headings.

Core Training	Experience	QADP - Wellbeing
CPD	VOC	Learning Vs Punishment
Guidance	QADP	Governance
Standard/Examination	QADP: Audit Errors sizing	Programme Improvement
Code of Practice	QADP Penalty Points	Positive Comments
Tools	Auditor Competence	

These headings then formed the basis for our analysis of the feedback and recommendation contained in the feedback.

We finally used this body of information and LBSPartners knowledge of quality assurance and organisational best practice to develop the key findings and recommendations.

Chapter 4 Assessor Competence, Development and Registration Review

4 a. Examination

Key Findings

The exam effectiveness is limited. It is perceived as not adding value, the questions are not all relevant, the language is too complex and exam frequency is too short. It is viewed as a missed opportunity for learning. In general, it is felt that in its present form the exam is something you must do to keep registered and as it stands does not improve competence. Assessors articulated that “BER exams are time consuming and they do not in any way improve competency” and a “waste of time and money”. The preparation and taking the exam is tedious and does not do anything for standards or upskilling.

The content of the exam also comes in for strong criticism going as far as to suggest the current exam process contributes nothing to learning and upskilling for the future and therefore does not help the QA process. The exam does not keep pace with changing technologies. There is belief that a good proportion of the questions are irrelevant to the day to day working as a BER assessor.

Comments like “To me the exam is a measure of how well you can read”, summarises the general sentiment.

The two-year exam frequency is challenged in the sense that “No other professional body requires their members to have to re-qualify every 2 years,... to a pass rate of 70%!”. The two-year frequency for existing assessors is regarded as excessive.

The exam is also regarded as a missed opportunity to learn. As expressed by an assessor “Since there are no learning outcomes from the exam e.g. if I get a question wrong I do not know what the question was and potentially I could make the same mistake on my next BER assessment” captures the general sentiment. An assessor stated that “I’ve done the exam 5 times and my score has actually gone down from 98% to 90%.... despite 10 years of real experience.... how can that be right? No learning outcomes from the exam.” The exam language has also been criticised with “some of the questions in the exams seem to be more about checking our command of the English language” summarising the general sentiment.

Key Recommendations

For Domestic assessors remove the need for the exam and use the QQI Level 6 as the registration requirement. Any differences between the exam and QQI Level 6 [6N0732) should be incorporated into 6N0732. This point is discussed further in section 4.e.

For Non Domestic assessors remove the need for an exam. Develop a mandatory training course for new entrants. This point is discussed further in section 4.e.

4 b. Training

Key Findings

There is a perception that the “ SEAI don’t believe they should provide training” and that there is a “lack of support from SEAI with major focus put on QA and not enough on training and developing!”. Heat pump technology is often mentioned as a potential for improved training and an area of concern. Heat pump technology is relatively new and some assessors struggle with it.

Examples quoted where assessors are sometimes left to their own devices to figure this out on their own e.g. “searching through heat pump suppliers’ webinars for scraps of Knowledge”.

There is also a concern that “new information is available to auditors way ahead of assessors”.

The “DEAP 4.2.0 Workshops Feedback” report gives an indication that workshops are received positively. That particular workshop rated the content of the workshop at 81% for “Extremely Helpful/ Very Helpful and “Delivering on Objectives” at 85%.

Key Recommendations

Provide new information in a timely manner i.e. in parallel with auditors.

Increase the focus on CPD as will be discussed later.

Increase the frequency and ease of use of workshops. Online workshops would help here.

4 c. Continuous Professional Development (CPD)

Key Findings

There is an overwhelming appetite and desire for Increased CPD and workshops. “We attend CPD – at our expense / time. We try to upskill. We go to meetings in the RDS - and the only people not being paid to be there are the assessors” reflects that desire but also the sense that SEAI are not pitching in strong enough to effectively help with CPD.

There is a recognition of the necessity for assessors to keep pace with changes. The BER Assessor Annual Survey 2019 Survey reinforced this need with 93% respondents “stating that they would attend extra workshops”. This need is even greater than before due to the changing energy and building environment.

Heat pumps are continually raised as an opportunity for development and upskilling. Assessors repeatedly refer to heat pumps as a knowledge or competence challenge. “Right now, if someone offered me €1000 I wouldn’t touch a heat pump”. This reflects the anxiety that assessors feel regarding new technologies and the need to upskill.

Some assessors have indicated that they are being guided by manufacturers and often they are not clear on what are acceptable sources of information. Need to understand why this transfer of knowledge between assessors and the help desk is not occurring in all instances.

This lack of knowledge can go against the strategic direction of SEAI. As one assessor put it “The problem is then we can end up telling people to go with boilers as heat-pumps are too much trouble”.

As an observation there is a suggestion that there are broadly 2 camps or approaches to conducting BER assessments:

One end of the scale is the highly professional, highly motivated, seeking to take on interesting work, new builds, new technology, and provide the most accurate energy rating. On the other end of the scale is to keep it simple, stick with basic BERs, use default values, avoid any complexity of grey area, get in and get out quick. It is perceived this approach will attract fewer audits. Using default values is less accurate and keeps costs down.

Key Recommendations

Shift the focus and emphasis away from an exam system to CPD. This would start the shift from a punishment ethos to a Learning ethos. This change in emphasis would not only better increase the knowledge base but also improve the morale among assessors. It would also better position assessors to keep pace with changing technologies and environment and target specific needs much more effectively than a two-year exam structure. As quoted by an assessor “I can happily confirm that I gain far more from these CPD events than I do from sitting a 2 hour exam every 2 years to maintain registration with SEAI” In Comparison most professional bodies deal with upskilling after initial qualification with CPD programmes.

Make CPD Mandatory and back it up with a Recognition system. Assessors would be required to complete a specified number of CPD hours/points per

year. This would facilitate a move from a penalty points orientation to a CPD points system.

Utilise feedback from Audits/Auditors/Help desk to guide and prioritise the type and content of the CPD agenda. This would introduce a better feedback system that would feed the outputs from audits into improving the knowledge and competence of assessors. CPD can include short webinars to show how things can be improved and go through frequently asked questions to the help desk. This would also enable SEAI to receive valuable input from BER assessors on a regular basis. The corollary of this is that CPD would be an enabler to reduce audit failures. The positive cycle of learning can also have a positive effect on costs where the potential workload of auditors would be reduced.

Increase the use of Online CPD via webinars. This provides a very effective and reduced mechanism to upskilling. It eliminates travel, saves precious time, and makes it more accessible for all Assessors regardless of their location. Webinars can also facilitate the sharing of experiences among assessors.

The webinars should also be blended with appropriate technical bulletins to give an enhanced learning experience.

4 d. Qualifications

Key Findings

The minimum entry level for new BER Assessors set at NFQ Level 6 for Domestic and NFQ Level 7 for Non-Domestic and recognised equivalents is appropriate.

Specialist knowledge is becoming an increasing requirement e.g. Heat pumps. The knowledge requirement for new builds and existing properties is diverse. The ability to keep up with the wide spectrum of BER assessments (buildings/ technologies) is a challenge.

Key Recommendations

The key challenge is building up initial competence and keeping pace with changing technologies and requirements.

It is more effective to resolve this challenge through a proficient CPD programme as discussed in Section 4c.

4 e. Registration & Re-registration

Key Findings

The fear of deregistration and the consequent impact on an Assessor's livelihood is significant. There is little comeback if an assessor is removed from the register. "An assessor loses his customer base which takes years to develop and self-confidence is shattered and income disappears". One recently deregistered Assessor commented that they "felt I had no option to resign from the BER Assessor due to multiple issues with the BER Assessor scheme, in particular the QADP process & Helpdesk". This is a significant element in the climate of fear which will be expanded on in Chapter 8, "Relationship between SEAI and Stakeholders".

The Registration process for Domestic Assessors has three phases: Pre-qual, Training and Exam.

The Pre-qual requests a NFQ Level 6 Advanced Certificate/Higher Certificate in construction studies (or similar) or a recognised equivalent. Equivalence is defined as a combination of an appropriate construction related qualification and significant relevant experience. This equivalence needs more clarification /standardisation and is an opportunity to broaden the population of potential candidates. This would also help address the scalability challenge as described in Chapter 9.

The Training program requires certification to a QQI Level 6 [6N0732] and involves four assignments plus practical/theory examination. This duplication of training and exam needs to be questioned as to whether it is adding value to the competence of assessors.

Key Recommendations

Review the de-registration process to cater for timing instances as described above.

Incorporate a group responsible for standards throughout the BER process. This group would assess candidates on an individual level for equivalent experience as described above.

For Domestic assessors remove the duplication of phases two and three and use the QQI Level 6 as the registration requirement. Any differences between the exam and QQI Level 6 [6N0732] should be incorporated into 6N0732.

For Non Domestic Assessors develop a mandatory training course in lieu of the exam. The content to be agreed by a standards group as recommended below.

Chapter 5 Governance Review

5 a. Code of Practice

Key Findings

BER assessors are required to act in an independent and transparent manner at all times. A system of “Declaration of Independence” and “Declaration of Interest” is in place. This system combined with the professionalism of assessors to do the right thing appears to find the right balanced approach. The independence of the Audit Management Agency has been raised as an issue. The Audit Management Agency conducts assessments in competition sometimes with the assessors they are auditing. Even though this agency may conduct audits from a different arm of the organisation the perception of a conflict of interest is there and creates a sense of one rule for Audit Management Agency and another rule for BER assessors.

Key Recommendations

The fact that Audit Management Agency operate as both assessors and auditors is not unusual. Companies use a “Chinese Wall” approach to mitigate against this potential conflict of interest. More research is needed to determine if this perception of conflict is real or a consequence of a lack of trust within the assessor community.

5 b. Guidance

Key Findings

Technical Guidance documents can be lacking and their effectiveness needs improvement.

Numerous examples have been quoted including: “the DEAP manual contains too many grey areas; many window companies, insulation companies, heat pump installers are not aware what type of documentation is required; difficulty with calculations”.

Information can be spread over multiple documents leading to difficulty in determining how to deal with specific situations, leading to errors and leading to QA issues.

The efficacy of the help desk gets mixed reviews and its effectiveness appears to reflect the individual expertise of the person answering the call. There are concerns that knowledgeable experienced people have left the help desk in recent times.

Key Recommendations

There is a challenge in getting feedback into the system, processing it, and driving improvements. This is not a once off event but needs a continuous feedback loop. Need listening posts to collect and collate issues around guidance effectiveness and increase ease of use.

In Chapter 8 we will discuss the introduction of a mentoring process as one potential source of feedback. Increasing the use of small workshops would also create a mechanism for collecting this feedback and potential inputs on how to resolve issues and create more standardised processes/forms. Help desk questions can be another useful listening post.

Publishing frequent bulletins on the questions that are addressed to them would be a potential source of learning for assessors.

5 c. Governance

Key Findings

There is a perception that the SEAI is too hands off. Many of the key functions are tendered out to external contractors and direct contact with assessors is limited. The inputs of assessors into the governance process is limited.

Transparency also suffers as a result and consequently raising the levels of frustration and resentment.

Key Recommendations

Include assessors feedback in the design of the governance process.

This involvement is further discussed in Chapter 8.

Chapter 6 QADP, Audits, Sanctions, Auditor Competence. Learning vs Punishment

6 a. QADP Process

Key Findings

QADP is not often referred to or spoken about in a good light in the Assessor Community. The combination of Examination, Audit and Sanctions was generally seen as a good thing. This goes back to a number of years ago where assessors felt their good name was being tarnished by 'cowboys' and the combination of examination and audits cleaned up the profession significantly. However, their interactions and experience of the process causes a lot of stress and frustration.

The title of the process is the first problem. Modern thinking on Quality Assurance is that it must be built into the core work processes and capability of the organisation. The emphasis on checking after the event to control the quality of work has diminished significantly. This model works best when people feel pride in their work and their association with the organisation.

Recommendations

Separate Quality Assurance from Disciplinary process and connect it with Education.

Change the language from discipline to enforcement and deal with it as a governance and compliance issue

Putting Quality Assurance and Discipline in the same sentence is not helping. Discipline (the practice of training people to obey rules or a code of behaviour, using punishment to correct disobedience) has a demotivating effect on most people, whereas the intent is really enforcement (the act of compelling observance of or compliance with a law, rule, or obligation). The thrust of much of the feedback from Assessors is that the principle of enforcement is fine, its implementation is what they object to.

A more important problem is the negative emotional impact of various engagements with the process.

The audits are seen by assessors as a colossal time burden, both their frequency and duration. However, the data does not support this.

240 assessors had one D+P audit in 2019. 196 assessors had 2. The quantity of assessments does not appear to be the underlying problem. This leads us to believe that the experience and memory of the past audits is more of a problem.

6 b. How Assessors feel about Audits

Findings

It is also felt D+P audits serve to undermine the assessor's relationships with their clients in their current format. There is a strong feeling that a more collaborative audit process would serve better, both as a learning and a feedback mechanism. There are varied comments about the way auditors interact with assessors, some are adversarial while others are collaborative and constructive.

Recommendations

The D+P audit process needs to be reviewed. We would recommend using a customer journey format that will capture how assessors feel about the process. Auditors need to be appointed and selected based on interpersonal skills as well as technical competence. A competency framework that reflects 'people' skills as well as technical skills for each stakeholder would greatly aid in this auditing process.

6 c. Auditing & Targeting of audits

Findings

Auditing is not seen as a bad thing. The assessors would welcome a model that is less time consuming, does not necessitate them returning to the building and observe the auditor repeating their work.

Recommendations

Perhaps there is a way that an auditor could observe the assessment itself – this would allow for a collaborative and educational approach. This would be like the driver testing model but would certainly require both parties to understand how to behave and what to do when differences arise.

Targeting of Audits

There is also an opportunity to use the audit process to observe particular steps and assessment elements that are troublesome. Each audit should be an opportunity to learn or to improve. The implication is that SEAI would need to have a mechanism to identify problem areas, assign audits to gather information, and then implement corrective action.

6 d. The role of the BER Audit Management Agency

Findings

The role of the BER Audit Management Agency came in for some criticism as they are seen as a competitor by some of the assessor community.

Recommendations

This needs to be clarified or adjusted as discussed previously.

6 e. The Role of the Help Desk

Findings

The help desk is seen as being quite helpful overall. The erosion of expertise has been commented on by many assessors. They also mention that help desk responses are used regularly in BERs as evidence for auditors. There is some criticism around 1) capability of some help desk personnel, 2) procedural queries that get referred to SEAI and 3) DEAP queries.

Recommendations

Focus on developing the technical skills, competence and interpersonal skills and ensure the appropriate training is provided.

6 f. Tools

Findings

The DEAP system and knowledge website are a source of frustration. Many of the comments refer to DEAP and Heat pumps as areas where Assessors are opting to refuse work. Whether this is a tool issue or a change management issue is unclear but it will seriously hamper SEAI's ability to scale up.

Recommendations

Include assessor representatives in the design and roll-out of future tools and enhancements

6 g. Engagement with Assessors

Findings

From the above findings and the interviews and feedback it was very apparent that the engagement with assessors could be improved.

Recommendations

As most of the assessor interactions with SEAI revolve around the tools, audits, and knowledge systems these need serious attention. We recommend

that SEAI treat the Assessor Experience as a Customer Experience (or Employee Experience). All interactions with SEAI, its agents and systems should be understood as a Customer Journey where SEAI needs to delight the Assessor at every interaction. This is organisational, as every interaction, process and tool need to be intuitive, helpful, easy to use and provide value for the Building Owner and the Assessor.

The below diagram shows how building owners are supported by BER assessors who in turn have an “Assessor Support Team”. This teams job is to ensure a consistent and positive experience for the Building owner and Assessor at every touch point. Management (or Leaderships) job is to create and continuously develop this environment and its tools and structures – while also maintaining a positive environment for the stakeholders.

Building Owner									
Assessor									
Assessor Support	BER Training Providers	BER Assessor Examination	BER Helpdesk	BER Appeals Adjudicator	BER Audit Selection	BER Auditing Managing Agent	BER Auditors	BER Audit QA Review	
BER Management & Governance	SEAI EPBD Programme Management			SEAI Risk Committee EPBD Implementation Group			SEAI Inspections Unit		
National Policy									

6 h. Quality Assurance

Findings

The quality of the service needs to be built into the processes, tools, and education.

Recommendations

The best model for Organisational Excellence addresses 5 dimensions. A roadmap for improvement reflects these five dimensions, 1) Purpose & Alignment, 2) Processes, 3) People Capability, 4) Management Systems, and 5) Engagement.

Purpose, a common purpose statement that links all stakeholders in the pursuit of better building energy performance to react to climate change

Great processes and tools (including release processes) and a system of finding and addressing problems in the processes.

A relentless pursuit of the upskilling and engagement of the workforce – the majority of whom are not direct employees but are critical to the success of SEAI. Very well thought through processes to aid all Stakeholders, but particularly, Building Owners, Assessors and SEAI Employees & agents.

Management Systems and routines that engage every stakeholder, and in particular assessors with the organisation on a regular basis.

A look of the culture of the relationships as they are today and as they need to be into the future.

The roadmap in Chapter 10 would implement the 4 recommended workstreams using this 5-dimension framework.

6 i. Enforcement

Findings

The discipline approach is too strong and needs a rethink to enforce the legislation in a way that penalises the offenders without demoralising the broader assessor community.

Recommendations

There is a role for enforcement, but as many of the assessors say, ‘more carrot and less stick’. The system needs to be seen to be firm but fair. The assessor community want to be recognised as professionals and they want to be treated with dignity. A move towards a more reasonable system that reflects the severity of issues, the deficiencies in system and tools and does not threaten the livelihood of an assessor who is trying to do the right thing.

Nobody who is reasonably proficient at their job should feel a threat to their livelihood for simple errors.

However, habitual poor performance needs to be addressed. This should be done in a way that addresses the poor performers, either through supportive correctional mentoring or ultimately removal from the register. This process must have minimal impact on the majority of assessors who are proficient.

6 j. Penalty Points

In 2019 penalty points were awarded to 306 Assessors (~ 53%)

The focus of all stakeholders needs to be to reduce penalty points (or mistakes). The program must adopt a principle of “Right First Time” and design all processes and interactions to make problems visible and improve performance towards 100% right first time.

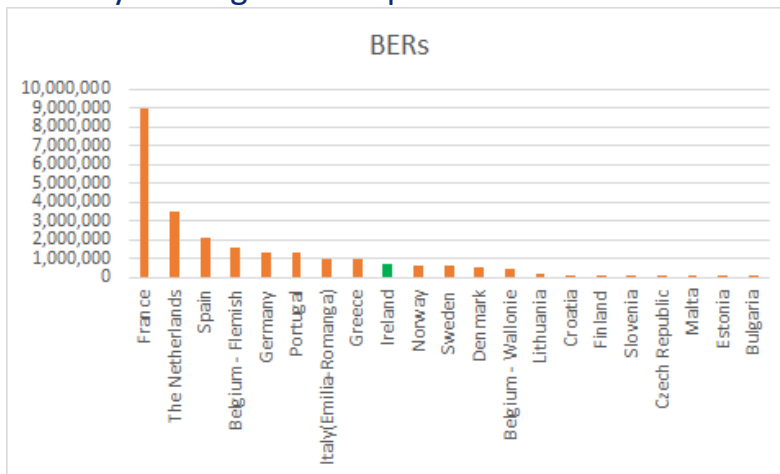
Chapter 7 International Comparison

A comparison was done using data from 23 countries or regions. The information was from a benchmark undertaken as part of the EPBD CA4 - Bucharest Meeting - 25-26 October 2017. The CT3 Session "Knowledge market on costs for the development and operation of the EPC registers and associated software"

There were some inconsistencies on how data was reported but overall, the collection of Posters gives a particularly good summary of the maturity and practices in these 23 jurisdictions.

7 a. Numbers

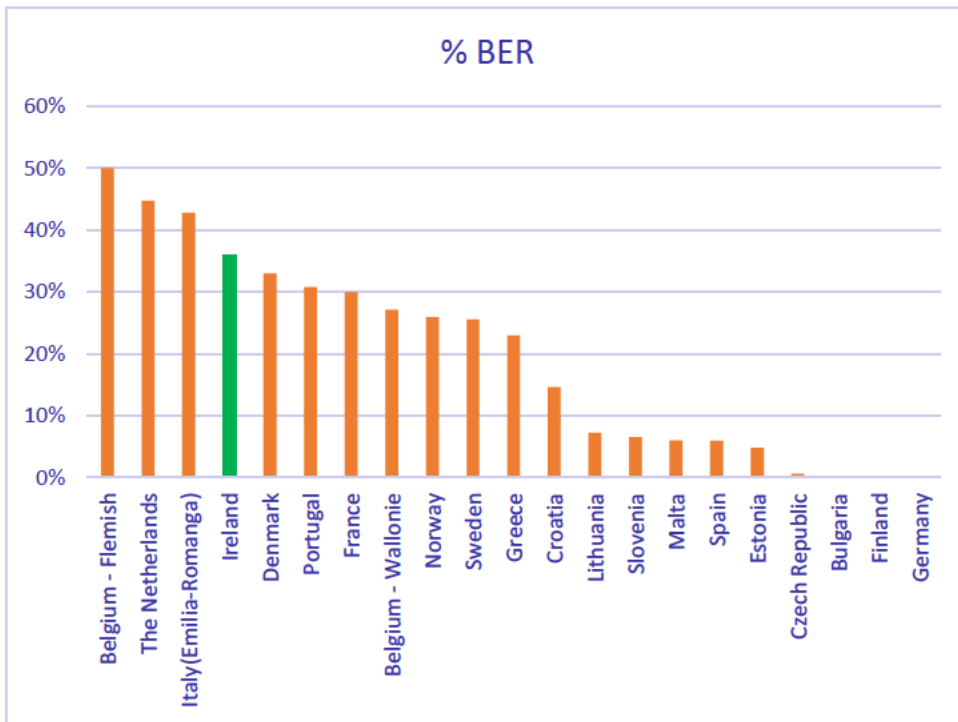
Key Findings - data up to 2016



France & The Netherlands have impressive statistics when you look at the number of BERs issued. France = 9,000,000 and Netherlands = 3,455,328 with Ireland at 722,106.

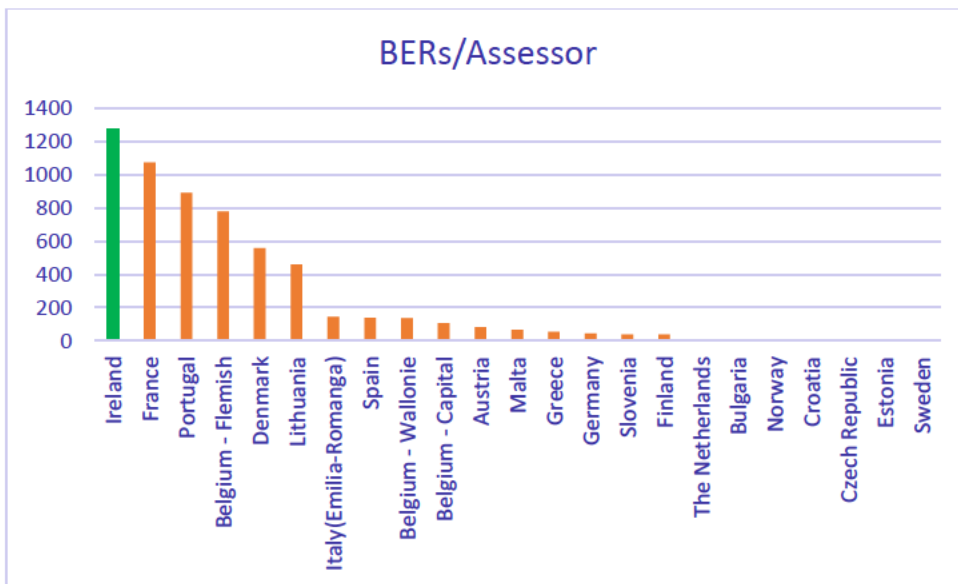
As a follow up while Ireland has a different population and building stock, these regions are where we should look for ideas about improvements.

7 b. BERs per Building



When we look at the BER coverage per building then Ireland was in fourth place at the end of 2016 with 36%, The Belgian Flemish region was at 50%

7 c. BERs per Assessor



This chart shows the number of BERs published per Assessor. Not too much can be inferred from this chart as the longevity of the programme will have a bearing on this statistic. It does point to a wealth of concentrated experience in the Assessor community in Ireland.

One remarkably interesting finding from this is that Norway use a self-assessment model.

7 d. Checking & Audit

Most regions undertake 100% validity or manual check of BERs. The Audit regimes vary from region to region. There is not even good consistency in the audit percentages.

Malta – 1st and sample

2 Countries < 0.5%

Range from 1% to 2.5%

3 regions Belgium – Brussels, France and Czech Republic take a different approach. They audit the assessor instead of the assessment. This practice is well worth investigating.

France explained their system particularly well:

“Description of the control process (including info on the number of controls): The Quality system requires the work of each qualified expert to be checked on a continuous basis. New experts are checked 4 times during the first year, and 4 more times in the following 4 years.”

Following this first cycle of certification, experts are checked 4 times every 5 years.

Belgium – Brussels Capital Region is another good example

EPCs are selected for control on a random and targeted basis. The more EPC's you issue the more chance you will have to be controlled. When an EPC assessor is selected for control, an expert, paid by the public authority, choose randomly 4 of his/her EPC, asks for all proof documents and repeats the calculation including (1 control on the 10) visiting the house or apartment to confirm details. The impact of errors is assessed to figure out if the EPC should be revoked. If this is the case, the EPC issuers must make a new one for free.

240 EPC controlled in 2016

7 e. Examination

France is the best practice found. They use Certification instead of Examination. It is done in 5-year cycles

1 cycle: 4 checks in first year, 4 more over the following 4 years

Later cycles 4 checks over 5 years

Belgium – Brussels Capital Region

Registered End-users have only to pay for the training: ‘one time + one update/5 years’

Key Recommendations

The above recommendations have been treated in their relevant chapters

Chapter 8 SEAI relationship with stakeholders

In general, the feedback indicates that the relationship between the assessors and the SEAI needs to be improved. The BER Assessor Annual Survey 2019 puts the satisfaction rating at 39%. The relationship is under pinned by a climate of fear.

8 a. Communications

Key Findings

Communications between assessors and SEAI needs to be improved towards a climate of collaboration and away from a climate of fear.

Key Recommendations

While recognising that some of the language is based on legislation the language and structure of communications needs to improve. The tone of correspondence and documents needs to move away from being legalistic and confrontational to being simple and supportive. The Code of practice, Terms and Conditions are all very legalistic in nature.

The Audit process title of the QADP references to “Disciplinary” and sets the confrontational tone for the Audit process.

8 b. Confrontational & Adversarial Environment

Key Findings

The climate of fear is influenced mainly by the QADP.

QADP is perceived as a disciplinary system and less of a proactive guidance system for assessors. The orientation of the QADP and the way it is being administered is having a very negative effect on SEAI’s relationship with assessors. Comments like “I have often considered giving up the role because of the constant fear and threat of audits” and “QADP is currently administered in a Cromwellian manner” were not uncommon. QADP is viewed as a punishment system. The potential impact on an assessor’s livelihood because of negative audits and the penalty points system is a key factor driving the climate of fear.

The QADP is also a factor in the perception of a lack of fairness e.g. “he was inundated with audits and felt he was being targeted” and “they are searching for problems during an audit as if they are trying to ensure they can give penalty points”.

There is also a sense that the penalty point system is excessive.

The feedback on auditors is mixed. The interactions between assessors and auditors’ range on a spectrum between a professional and a learning

experience to where they are described as “faked sheriffs”. There are indications that improvements are required in their approach. The overall feedback is balanced with a recognition that there is a need for governance to maintain standards e.g. “There needs to be QA but not this “bully boy” approach” and a need to remove “Cowboy’ Assessors”. There is also some acknowledgement that things have improved recently, e.g. “Over the years some of these Audits have been very trying, unnecessarily creating high stress levels & a high cost to the Assessor. In later years this has become more humane” and that the new Programme Manager is having a huge influence.

Key Recommendations

Advocate the transition of the QADP from a penalty approach and fault finding to a mentoring emphasis. This would involve sending auditors to accompany assessors on an upcoming survey. Having the Auditor attend the initial assessment visit would eliminate the need to revisit a property. A review of the data entries would occur before submission and give feedback to the assessor. This would be more beneficial in gaining information and allow more effective training. It would result in more efficient practices, more emphasis on learning, enhance the assessor’s knowledge and reduce the climate of fear. It would still fully support an effective QA process while also providing positive outcomes for all concerned.

A move away from a penalty points system towards a system of continuous assessment would also be beneficial. A bad assessor will eventually be apparent and can be sanctioned.

The results of the mentoring audits would provide an input into this continuous assessment. The mentoring approach would also reduce the embarrassment felt by some assessors of a degrading experience i.e.. “like a naughty pupil” in front of a client.

It would also be advantageous to publish salient points derived from the mentoring sessions in technical bulletins to leverage of the mentoring learnings. It is felt that sometimes audit issues can be “interpretation of grey areas”. Moving to a mentoring approach would convert these misunderstandings from a punishable offence to a learning experience. Training is advised for the Auditor community in improved communications and using phrases like “gotcha when he found an error” be removed from their lexicon.

8 c. Not Heard

Key Findings

There is a sense that assessors are not being heard. The sense of not being heard or listened to is emphasised by the fact that there is no perceived mechanism for valuable assessor feedback to reach the right people, or to change and improve the system. The primary points of contact between SEAI and assessors is predominantly through third parties e.g. Auditors, Help desk, BER training. It effectively diminishes the engagement and relationship between SEAI and assessors.

Key Recommendations

The engagement can be improved by moving to a more collaborative approach to increase the “Buy in” from assessors. This would increase transparency and a culture of openness. This would address issues like the recent introduction of the new procedure that assessors must upload all documentation within 5 days of audit notification which created flak from assessors.

There needs to be structures that facilitate this increased collaboration and engagement with the assessor community. This assessor community by and large cares about their profession and the environment. This direct productive relationship between SEAI and assessors can be enhanced by using forums such as virtual “Town Halls” and “Brown Bag Lunches”, on a consistent and regular basis. This would improve the two-way communication process.

8 d. Stakeholder Alignment

Key Findings

The relationship is also impacted by an organisational structure that is driving a low degree of stakeholder alignment

Key Recommendations

Redesign the Stakeholder alignment.

A business transformation is required to address this low degree of stakeholder alignment. This would involve moving towards a “Learning organisation” approach. There are two types of people in an organisation. Those who add value and those who support those who add value, see attached illustration.



The Learning Organisation approach coaches and enables the “value adding” members of the organization, in this case the assessors. It places an emphasis on customer support to and for assessors.

Development of a common and shared objectives would be an integral element of this relationship. Moving towards this new relationship would be initiated by an internal workshop in SEAI and evolve to collaborative workshops with key stakeholders.

Chapter 9. Scalability

9 a. Attractiveness of BER Assessor as a Profession

Key Findings

The Climate Action Plan will drive an increase in the need to scale up BER assessments. This will offer opportunities for assessors.

The attractiveness of the BER assessor profession is a concern and has the potential to negatively impact the scalability of the programme. Assessor morale is also an issue contributing to the comments made by some assessors that they are contemplating leaving the BER programme. Assessor morale is reviewed in more depth in Chapter 8.

The competitive nature of the market in earlier years placed downward pressure on prices. This has plateaued but feedback still indicates that this has left a lasting impact on prices and consequently the poor attractiveness of BER assessments for some assessors. It had been described as “race to the bottom”.

There are doubts “whether it’s a viable career on its own” and that it “needs to be an adjunct to other activities/services”. The BER assessment in some quarters struggles to be a stand-alone operation. This is complicated by the fact that BER assessments have become more complex. As stated the “amount of knowledge required & the myriad of sources of information to be familiar with must be a daily routine to remain efficient”. There is a struggle between financial viability and proficiency.

Audits are also mentioned as a hindrance to scalability where the time and travel costs are highlighted as issues.

Key Recommendations

Improve attractiveness by reducing costs for the assessor and increasing the Value of BER programme.

A focus on reducing BER assessment operational costs is required. This can be achieved for example by increased standardisation, a project to reduce the costs associated with DEAP4 and the simplification of evidence requirements. There are three classifications for the assessor in terms of assessment difficulty i.e. Domestic new builds - high ratings, Domestic existing buildings - low ratings and Nondomestic buildings. There is an opportunity to reduce the assessment costs of domestic existing builds by reducing the effort required in terms of evidence and precision required. It is questionable that the effort required is justified by the precision required. It is analogous to measuring with a micrometer and cutting with a chainsaw.

A dedicated workshop with assessors on scope expansion with the subsequent opportunity to increase rates would be beneficial. The workshop could be combined with a detailed review of non-valued costs. Some assessors are ambitious about the future. The sharing of best practices from this cohort would increase proficiency across the board.

9 b. Tools

Key Findings

Tool efficiency is also a hindrance to scalability. The introduction of DEAP4 is also quoted as a negative influence in this regard. “We exited Domestic BER as it was no longer commercially viable – stopped 1.5 months ago due to additional time burden associated with DEAP 4”. Every individual set of data had to be uploaded separately where previously one copy had to be filed which could be pulled in event of an audit. It is mentioned that 50 assessments on a block of apartments took 3 times longer with DEAP 4. This can lead to a pick and choose mentality where for apartment buildings it was stated “we no longer wish to offer the service”.

Recommendations

Tools need to be designed in a way that is extremely assessor friendly and work even when internet connectivity is low.

9 c. Marketing

Key Findings

The BER Programme and the Assessor Profession are not sufficiently valued by the clients. SEAI played a very important role in marketing the service when it began.

Key Recommendations

The Value of the BER programme should be enhanced by increased marketing and promotion of the BER brand. Improve communication and linkage to the Climate Action Plan. Providing appropriate messaging and collateral to assessors would give them the opportunity to communicate a standardised and consistent message. The assessors themselves could be a great marketing channel if SEAI provided the messaging.

Messaging can also be provided to clients to reinforce the importance and benefits of the BER programme.

Chapter 10 Roadmap

10 a. Roadmap

	High Level task/activity									
Governance	Program Governance									
Change Management	Business Transformation									
	Program Management									
	Change Management									
	Communications									
	Operations									
	Monitoring/Improvement									
Organisation & Alignment	Stakeholder alignment									
	Relationship building									
	Collaboration/Engagement									
Capability Development	CPD									
	QA									
	Scalability									
	Tools									

10 b. Implementation Task Details

GOVERNANCE

- Program Governance
 - Decide on Participants include assessor voice
 - Roles/RACI
 - Establish structure
 - Develop measures of success

CHANGE MANAGEMENT

- Business Transformation
 - Develop Key objectives
- Program Management (Initiation/planning/execution/monitoring/close)
 - Team & Leader
 - Goals & Scope
 - Detailed Plan & Key Milestones
- Change Management
 - Communications plan
 - Engagement strategy
 - Risk management
 - Resources required
- Operations Monitoring/Improvement
 - Review Structure
 - Dash board
 - Action Structure
- Communications
 - Language modification Program, forms, website, policies, SOPs, Help desk calls

ORGANISATION & ALIGNMENT

- Stakeholder Alignment
- Relationship building
- Collaboration/Engagement
 - Virtual townhalls
 - Virtual Brown Bags
 - Regular feedback on change program status

CAPABILITY DEVELOPMENT

- Competency Framework
 - Used to drive updates to training, CPD, Audits and tools
- Exam
 - Non - Domestic assessors will require the exam to be replaced by a mandatory training course. During the transition period when moving away from the exam structure temporary courses/validation exercises may need to be introduced

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- CPD
 - Establish CPD governance group
 - Develop roadmap for CPD modules with focus on career progression and technology change
 - Establish mechanisms to channel feedback from Audits/Mentoring, Auditors, help desk into CPD content
 - Develop on line CPD learning and workshops
 - Develop CPD recognition system
 - QA
 - Develop Mentoring Program:
 - Mentoring training for auditors (technical & people skills)
 - Mentoring Assessment methodology
 - Mentoring Guidance for Assessors/auditors
 - Scalability
 - Workshop to determine best practices/standardisation/cost reduction opportunities
 - Simplify evidence requirements – domestic existing buildings
 - Increase value proposition of BER program via Marketing/Branding/messaging/Assessor involvement
 - Develop Structure for best practice sharing
 - Develop Assessor Recruitment, Retention, Upskilling programs
 - Tools
 - Tools enhancement e.g. DEAP4 efficiency and ease of use
 - Online training modules