

BER QA

Frequently Asked Questions

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This document answers frequently asked questions about the BER audit process as it applies to BER Assessors. The QADP for BER & DEC Assessors, and the Code of Practice for BER & DEC Assessors must be followed alongside this document.

BER Assessors must ensure that they are using the latest version of this document. Information and any updates will be published on the SEAI website at <https://www.seai.ie/ber/support-for-ber-assessors>

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1. Introduction

What is an audit?

An audit is an assessment of a published BER.

The audit checks whether the BER assessor has carried out the BER assessment accurately and in line with the BER Assessor Code of Practice, the 2012 Regulations and the relevant BER methodologies, i.e., domestic or non-domestic.

More information on the BER Auditing Scheme can be found in the QADP document.

Why does the SEAI audit?

The SEAI are required by law under the Regulations, to monitor and maintain the quality of published BERs. To fulfil this responsibility, SEAI have a quality assurance process in place, which includes auditing. Audits are used to assess the quality of BERs and ensure that a certain standard is achieved and maintained. In addition, audits can be used to identify knowledge gaps for individual assessors or across the industry.

Are all BERs audited?

No – in a typical year 1-2% of BERs that are published are audited.

How is a BER selected for audit?

Any BER that is active on the Register may be selected for audit by SEAI.

A BER can be selected for audit in one of two ways:

Random selection

A number of published BERs are randomly selected for audit, in order to get a general sense of the health of the BER scheme.

Targeted selection

A number of published BERs are targeted for audit, and may be selected for a specific reason such as:

- To check specific quality concerns within published BERs,
- To assess areas of risk, e.g., checking BERs with a non-default heating system efficiency to check for errors and misunderstandings in the application of the BER methodology, and
- To identify knowledge gaps, which may inform the development of learning materials for assessors.

Who carries out an audit?

SEAI has a panel of auditors who carry out audits on an on-going basis. These auditors are independent contractors engaged by SEAI to carry out the BER audits. The names and contact details of the BER auditors are provided on the National Administration Systems - NAS for domestic BERs and NDNAS for non-domestic BERs - and on the BER Assessor Members Area.

Are there different types of audits?

Yes, there are three types of BER audit:

1. *Data review audits*

These are high volume, desk-based audits carried out on published BER assessments. They are used to check compliance with a particular element or data point within the Code of Practice and/or the relevant BER technical methodologies.

Data review audits normally only look at a limited and specific number of data points within a 'topic', e.g. water heating, and the auditor will ask a small number of questions on this selected topic within the audit.

Some examples of Data Review audit requests are given in Appendix A1.

2. *Desk review audits*

These are medium volume, desk-based audits carried out on a single BER or selection of BER assessments published by an assessor. They are carried out in a similar way to data review audits but are more detailed and in-depth in the questions they ask.

Within a desk review audit, an auditor will select a few data points within the BER to check its compliance with the Code of Practice and/or the relevant BER methodologies. An auditor may also request any supporting documentary evidence from the Assessor to support the entries made in the BER file and to check that the relevant technical methodologies and/or the Code of Practice have been followed.

Only the questions asked within the desk audit request are reviewed as part of the audit. This could mean that there are other errors in the BER, but they have not been flagged as part of the audit.

An example of a full Desk Audit request is given in Appendix A2.

3. *Documentation and Practice audits*

The Documentation and Practice audit, also known as a 'D&P' audit or a 'site audit', is a full review of the BER assessment, including the survey.

There are three types of D & P audit:

- **Site-visit** – the auditor and assessor meet at the building assessed in the BER. In this audit the auditor can examine the collection of evidence, such as the surveying of the property and measurement methods used by the assessor;
- **Office Based** – where a site visit is not practical or possible, the assessor and auditor meet off-site to review the assessment, e.g. at the assessor's office or another convenient location;
- **Virtual** – where a face-to-face meeting is not possible, the assessor and auditor meet online to review the assessment, e.g. using Teams or similar.

How often do audits happen and how long do they take?

Every BER Assessor can expect to receive:

- At least one Data Review audit per year;
- At least one Desk Review or Documentation & Practice audit per year.

Assessors may receive additional audits where, for example:

- they publish a high volume of BERs,
- if their audit results indicate a higher risk of non-compliance, and
- a quality concern has been identified in one of their published BER assessments, which requires further review.

2. Receiving an audit

Who will contact me when I am selected for audit?

The BER auditor who has been assigned to the audit will contact you by sending an email to your registered email address.

If the auditor does not receive a response to the email, the auditor will call your registered phone number to follow-up on the audit request.

What are the time frames of an audit?

You have 3 working days to acknowledge an audit request from the initial notification.

You have 21 days to facilitate an audit from the initial notification of an audit request.

- For a data audit this means providing the full response to the audit within 21 days
- For a desk audit this means providing the full response to the audit within 21 days
- For a D&P audit, this means providing a full response and arranging the site visit within 21 days.

What should I do if I cannot respond to an audit within the time specified?

Contact the auditor directly to explain the situation as soon as possible after receiving your audit request.

If appropriate, it may be possible to request an extension to your audit deadline. These requests are dealt with directly by your auditor as they must reschedule the audit into their work schedule.

Each extension request is dealt with on a case-by-case basis.

What happens if I miss the reply deadline?

Audits are a mandatory requirement under the BER Quality Assurance Scheme. If you do not respond to an audit request within the 21 day period, it will be marked as a non-response audit. A non-response has a Severity 1 outcome with 3 penalty points applied to the Assessor's record.

What if the owner won't grant me access to their property again?

Contact your auditor directly to explain the situation. As part of the audit process, your auditor may request proof that your client has declined the audit.

It's worth noting that if a homeowner decides not to facilitate such a request, SEAI may

decide to revoke the relevant BER Certificate. The sample letter of engagement, which can be found [here](#), has this stated in point 13.

I am a new assessor, when will my first audit happen?

Soon after you register as a BER assessor and start to publish BER assessments, you will be allocated a mentoring audit with one of SEAL's registered BER auditors. Mentoring audits are typically carried out as D&P site-visit type audits, where you will be accompanied by one of SEAL's registered BER Auditors during an on-site re-assessment of the selected BER.

See Section 6 for more information on mentoring audits.

3. Responding to an audit

What do I need to include in an audit response?

The audit request will generally set out the information you are required to provide, as shown in the examples of Data Review requests in Appendix A1 and the example of a Desk Review request in Appendix A2.

For the more intensive audit types such as Desk Review and D&P audits, it is likely that you will need to submit all documentary and supporting evidence gathered during the assessment to support your response to the audit request.

What happens if I forgot to include something?

If you realise you have forgotten to attach a document relevant to the audit query you should contact your auditor as soon as possible to let them know and to provide them with the missing documentation.

However, if you do not submit your audit response on time, then any additional information may not be accepted. If there is information that was not considered during the audit which could significantly influence the result, you should include this information as part of your appeal against the audit findings.

See Section 5 for more details on audit appeals.

What happens once I have made the audit submission?

Once an audit is completed, the auditor sends the audit findings to the BER Quality Assurance (QA) Team.

The QA Team will then issue your audit findings to your registered email address. Your audit findings are contained within the Preliminary Audit Report (PAR).

If you wish to appeal your audit outcome, you can do so using the link that is included in the PAR email. This will direct you to an 'Appeals Submission Portal', which is a unique appeals portal for your audit. It contains additional information on how you should prepare your appeal and what information is required to support the appeal. The appeals portal is active for 14 days from the date you receive your PAR.

After 14 days, if you have not made an appeal the Final Audit Report (FAR) is issued and any final audit outcome is recorded on your record.

4. The Audit Outcome

What are the possible audit outcomes?

An audit has one of the following outcomes:

- Compliance,
- Severity 3 non-compliance,
- Severity 2 non-compliance, or
- Severity 1 non-compliance.

These are listed in order of increasing non-compliance, i.e. Severity 1 is the worst outcome.

How is the audit outcome calculated?

The audit outcome is based on two quantities calculated by your auditor:

- the **Gross Error** – this is the sum of the absolute values of all errors found in the audit,
- the **Net Change** – the difference between the published BER and the corrected BER.

An outcome is assigned to your audit depending on the size of the error. This is done using the appropriate error sizing matrix from Appendix B of the QADP document.

Whichever outcome is worse is selected as the final audit outcome.

For example, if the Gross Error is a Severity 1 and the Net Change is Severity 3, then the final audit outcome will be Severity 1.

Can I appeal the outcome of an audit?

Yes – if you disagree with any of the details in the PAR, then you can appeal it. See Section 5 for further details on how to appeal the outcome of an audit.

Does the BER have to be corrected if errors are found?

If the audit outcome is Severity 1 or Severity 2, or if there is a grade change, the BER will be revoked. Revoked means that it will be removed from the BER Register.

After a BER is revoked, you are then required to republish the corrected BER, by making the corrections set out in the Final Audit Report.

What happens if the revoked BER is not republished?

SEAI track all revoked BERs. If a BER is not republished within two weeks of the FAR being sent to you, SEAI will notify you by email that the BER must be republished.

If the BER is not republished your registration will be suspended.

Why do I have to tell the homeowner of the audit outcome?

The BER contract of service is between you and your client and you have an obligation under the Code of Practice to inform them when:

- their BER has been revoked as a result of an audit, and
- after correcting the revoked BER, provide them with a replacement BER certificate and advisory report.

If a BER is being audited, best practice would be for you to inform your client. Your client has an interest in the outcome and should be notified and kept up to date on the proceedings.

How does the audit outcome affect me?

Penalty points are assigned to an Assessor's registration based on the audit outcome.

- Compliance – 0 penalty points
- Severity 3 non-compliance – 1 penalty point,
- Severity 2 non-compliance – 2 penalty points,
- Severity 1 non-compliance – 3 penalty points.

How long will the penalty points remain on my record?

Penalty points last for 2 years from the date of issue of the Final Audit Report.

How can penalty points affect my registration?

If you accumulate 10 or more active penalty points on your record within a 2 year period, your registration will be suspended for 2 months.

If you accumulate a further 10 or more active penalty points on your record within 2-years of completing your first suspension, you will receive a second suspension and the suspension period is increased to 6 months.

If you accumulate again, a further 10 or more active penalty points on your record within 2-years of completing your second suspension, you will receive a termination of registration.

Penalty points are removed from an assessor's record on completion of any suspension, but a record of suspension remains on an assessor's record. After completing any suspension or termination, SEAI may also put particular conditions in place that must be met in order for you to be re-listed on the register of BER assessors. These are applied on a case by case basis.

It is important to understand that cases of suspension and termination do not happen very often and the majority of Assessors do not have their registration suspended or terminated.

5. Appealing an audit outcome

How do I appeal the outcome of an audit?

Within the PAR email there is a link to the appeals portal. Click that link to open the portal, where you can submit additional information on any of the audit errors listed in the PAR.

Note that you don't need to appeal each individual error. You can appeal one, several, or all of the audit errors.

What information do I need to put in an appeal?

Looking at appeals over the last number of years – both successful and unsuccessful appeals – we can see that successful appeals are usually supported by additional information not provided in the original audit.

Appeals that do not provide additional information are usually unsuccessful.

Some appeals successfully question an auditor's interpretation of the guidance, or highlight issues with the guidance, but these only constitute a small percentage of successful appeals.

What are the time frames of an appeal?

Appeals are normally resolved within 14 days, though it may take longer for complex cases. An example of a delay would be where a case has been escalated to the Department of Housing for clarification.

6. Miscellaneous

Are the auditors audited?

Yes, their work is routinely scrutinized by an independent auditor.

What if I have a complaint against the auditor, what do I do?

Complaints regarding an Auditor can be made in writing to qa@ber.seai.ie.

What are the most common issues with audits?

- Lack of supporting evidence
Most audits are desk-based, i.e. the Auditor does not visit the dwelling. In such an audit you are, generally speaking, being asked to provide evidence for the data values that you entered into the assessment.
- Misunderstanding of what constitutes supporting evidence.
Each data request will set out the information the auditor requires from you. If you do not provide all of the information, then it is more likely to be marked as an error.

What is the most common issue with Appeals?

Lack of substantiating evidence to overturn an appeal finding.

An Appeal is more likely to be unsuccessful if you don't provide evidence to support your appeal.

What is a Mentoring audit?

In a mentoring audit, penalty points are not applied.

- If you are a newly-registered Assessor, your first audit will be a mentoring audit.
- If you reach 6 or more penalty points, your next audit will be a mentoring audit.

The mentoring audit is used in these situations to help the Assessor focus on learning, without having to worry about getting more penalty points.

Note that if the outcome is a Severity 1 or Severity 2 or if there is a grade change, the BER will be revoked and the Assessor must republish, but penalty points will not be applied.

Appendix A - Examples

A1 - Examples of Data Review audit requests

Example 1

Water Heating: Options and Storage:

Showers and Baths

Please provide documentation for the bath/shower and pump related inputs (including make/model and number of each type where available). Representative photographs should be provided.

Please substantiate if mixer showers and associated cylinders are vented or unvented or from a pumped supply.

Where applicable, provide substantiation including photographs of flow restrictors, low water usage and/or WWHR.

Example 2

Building:

Wall U-value

Please indicate extent and dimensions of different wall types on your drawings/sketches. Where applicable, please indicate the semi-exposed areas.

Non Default U-values:

Please provide (where applicable):

- signed as-built specification/drawing (specify role of signee per Section 4 of DEAP Survey Guide) naming specific building products used
- u-value calculations
- invoices, receipts, photographs supporting the insulation installed.
- declaration of works for SEAI grant schemes.
- U-Value calculations including rationale for default U-Value if that is the starting point for the calculation.

Default U-values:

- Please provide documentation & photographs supporting the construction of the wall, insulation thicknesses and material type.
- Please substantiate any insulation entered with an age band default u-value different to that of the original dwelling.
- For filled cavity, please provide photographic record of drill holes on all relevant elevations and a photo of bead at meter box where present.

Example 3

Building: Windows

U-Value and Solar Transmittance

Default U-values & Solar Transmittance:

Please provide documentation & photographs supporting the entries. Where applicable, please provide gap between glazing, and photo of date/markings on window gap.

Non-Default U-values & Solar Transmittance:

Please provide (where applicable):

- signed as-built specification/drawing (specify role of signee per Section 4 of DEAP Survey Guide) naming specific window model(s) used.
- documentation from the supplier detailing window make, model and corresponding u-value certified data referencing the property address.
- substantiation for non-default values used for other glazing such as glazed & patio doors, roof lights, etc.

A2 - Example of a Desk Review audit request

Existing & New Final Ratings:

Please provide a copy of the SEAI survey form (or equivalent), detailed sketches/drawings, with room by room record per the minimum requirements of the DEAP Survey Guide.

Please also provide photo(s) of the entire front and each elevation of dwelling unit.

New Provisional ratings:

Per DEAP Guidance Document Section 3, signed-off specifications are required to substantiate all entries in DEAP.

Signed-off drawings are required and should include Site Layout, plans and elevations.

Please complete your comments and responses to the audit questions in the table below and submit any additional supporting evidence to your auditor or indicate that all the required evidence is already uploaded in DEAP.

Survey Details	
Item	Audit Request
1	<p>Survey Details: Property Address</p> <p>Please confirm Eircode and the source of property address as entered in DEAP.</p> <p>In the case of New Provisional ratings please provide dwelling location on a site layout and signed-off plans.</p>
Building	
Item	Audit Request
2	<p>Building: Roof U-value</p> <p>Please indicate extent and dimensions of different roof types on your drawings/sketches.</p> <p>Non-default U-values:</p> <p>Please provide (where applicable):</p> <ul style="list-style-type: none">- signed as-built specification/drawing (specify role of signee per Section 4 of DEAP Survey Guide) naming specific building products used- u-value calculations- invoices, receipts, photographs supporting the insulation installed.- declaration of works for SEAI grant schemes. <p>Default U-values:</p> <ul style="list-style-type: none">- Please provide documentation & photographs supporting the construction of the roof, insulation thicknesses and material type.

	- Please substantiate any insulation entered with an age band default u-value different to that of the original dwelling.
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Space Heating

Item	Audit Request
3	<p>Space Heating: Controls and Responsiveness: Control Category</p> <p>Please provide documentary evidence of all space heating controls, including required photographs.</p> <p>Please provide documentation indicating count & percentage of TRVs on all radiators where relevant.</p>

Water Heating

Item	Audit Request
4	<p>Water Heating: Options and Storage: Temperature Factor Multiplier</p> <p>Please provide documentation in support of both Temperature Factor & Multiplier, including required photographs of water heating controls.</p> <p>For Integrated indoor heat pump units, is DHW store in an airing cupboard? Please provide evidence of same.</p>
5	<p>Water Heating: Options and Storage: Water Storage Volume</p> <p>Please provide documentation in support of cylinder volume, including required key dimensions (height/diameter).</p> <p>If documentation/label with an ErP Directive, or CE mark, or relevant standard is used to support cylinder volume please provide documentary evidence that it matches the cylinder model installed.</p>
6	<p>Water Heating: Options and Storage: Is cylinder heated by Boiler System having separate time control of domestic hot water</p> <p>Please provide documentation, including required photograph that the hot water heating system has its own time zone, if applicable.</p>

7. Appendix B - Additional Resources

QADP Document for BER & DEC Assessors:

<https://www.seai.ie/sites/default/files/publications/Quality-Assurance-System-and-Disciplinary-Procedure-New.pdf>

Code of practice for BER & DEC Assessors:

<https://www.seai.ie/sites/default/files/publications/BER-Assessor-Code-of-Practice.pdf>

BER Assessor Members Area: <https://www.seai.ie/ber/support-for-ber-assessors/members/>

Assessor Resources: <https://www.seai.ie/ber/support-for-ber-assessors>

BER training webinars:

https://www.youtube.com/playlist?list=PL_CB9_aTPxOPdZKn4x4HJIHrioxHtB995

For technical queries or registration issues the BER Assessor Helpdesk can be contacted:

- by email: registered@ber.seai.ie
- by phone: 01 808 2029

For queries relating to BER QA, including queries relating to audits, email: qa@ber.seai.ie

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