



Elmhurst Energy's final response to:

SCOTTISH SKILLS REQUIREMENTS FOR  
ENERGY EFFICIENCY, ZERO EMISSIONS AND  
LOW CARBON HEATING SYSTEMS,  
MICROGENERATION AND HEAT NETWORKS  
FOR HOMES

Prepared for: Scottish Government



Date: 30/04/2021



## 1. Introduction

Elmhurst Energy is pleased that Scottish Government is seeking a consultation on 'Scottish Skills Requirements For Energy Efficiency, Zero emissions and Low Carbon Heating Systems, Microgeneration and Heat Networks For Homes' and as such we are delighted to respond to each question in turn.

The consultation asked 13 questions and we have answered them below. We hope you find the responses considered and useful for taking Energy Efficient Scotland forward in a progressive manner.

Elmhurst has answered the questions from a whole building approach; we are independent of fuels and technologies and therefore have abstained from questions directly relating to evidence on particular technologies. We believe that all good proven technologies have a place to play in making Scotland's Buildings more energy efferent and using cleaner fuels.

## 2. Questions and Answers

### **1a. Do you agree with our proposal to integrate the installer skills matrix into the Publically Available Specification (PAS) 2030 and Microgeneration Certification Scheme (MCS) installer standards?**

Yes. We fully agree that integration with PAS 2030 installer standards and the MCS standards is to be welcomed, as these will provide clarity for industry to launch Scottish skills requirements. Not all roles in retrofit need the same levels of training for example, dependent of the type of housing stock being assessed, the Scottish level 6 award for older buildings may not be necessary for all individual (roles) within any retrofit process. Certain people (roles) need to understand the performance of older homes whether in the design of a series of products and there interactions, or coordinating the necessary appropriate measures, whereas others need to be aware but not necessarily experts.

### **1b. Do you agree with our recommendation that manufacturer training should be in addition to, not instead of, these skills requirements.**

Yes. We agree manufacturer training should be an addition to any existing qualifications.



**1c. If you disagree with these proposals, please let us know why.**

Not applicable.

**2. What are your views on the timing for integrating the installer skills matrix into the PAS 2030 and MCS installer standards? What do you think would be a reasonable timescale for making the skills matrix mandatory in the standards?**

Installers will need time to undertake additional training, but integration should take place as soon as possible to uphold standards across the board.

**3. What are your views on how installers can meet these skills requirements, in particular the Recognised Prior Learning (RPL) route.**

While we are in complete agreement that all installers should meet the PAS 2030 requirements, we do not have a strong opinion on how an RPL route should be managed.

**4. What are your views on the competency requirements for the retrofit coordinator, advisor, assessor, designer and evaluator roles?**

Although it has been highlighted that, where high risk projects are identified the competency of the designer, in particular, will need to be robust we wish to emphasise that competency requirements should be vigorously upheld at all levels.

We have no other comments to make except that the roles listed are not necessarily individual persons. Many train for multiple roles – Retrofit Assessors also gain Retrofit Coordinator qualifications, for example.

**5. What are your views on our plans for developing heat network skills? For example are there any gaps in heat network skills that we haven't identified?**

We do not have a strong opinion on this.



**6a. What impact do you think our skills requirements will have on the energy efficiency, microgeneration and heat networks sector in remote rural and island communities?.**

The impact is likely to be an increased cost to deliver installation to these areas. Although those involved may not carry out a dedicated role but rather have to be qualified for multiple tasks due to the smaller population density, they should nevertheless be fully trained irrespective of the likely higher cost involved to deliver training, with the aim of upholding standards. Investment levels will need to be assessed to cater for the risks and rewards of working remotely in these areas.

**6b. What impact do you think our skills requirements will have on energy efficiency, microgeneration and heat networks sector in Scotland more generally?**

The impact is likely to be an increased demand for training courses.

**7. What impact do you think our skills requirements will have on competition including training provision, quality, availability or price of any goods or services in the market?**

The demand for training requirement will be high. We recommend the availability of training providers is taken into consideration. Some qualifications have only one training provider; no competition is present in the market place, therefore, and we do not consider this is a desirable situation. Availability may be at a premium, and prices artificially inflated where a monopoly circumstance is present. Standards should be maintained without relying on single-source training.

**8. What suggestions do you have for how digital technology could be used effectively to meet our skills requirements.**

Recent experience in lockdown has shown that training can be delivered online successfully, or in addition to classroom-based training where appropriate.

**9. Are there any area of skills we have not covered in this consultation that you think we should consider?**

None that we are aware.



## 10 What support do you think would help the sector achieve these skills requirements?

Long-term commitment is key to success of the scheme's delivery. Industry will not invest if it does not have confidence that the scheme is going to run for a period of time sufficient to see a return on investment in terms of both finance and staff resources. Making sure all policies and regulations conform during delivery will encourage industry to invest and benefit Scottish targets to improve the housing stock and reduce carbon emissions.

Where long-term commitment is in place, technologies will develop as time passes. All those involved should be required to undertake continuing professional development (CPD) to ensure that skills levels are maintained going forward. All qualifications, therefore, should have mandatory in-built CPD stipulations and the skills level requirements of all roles should be re-evaluated in future years to accommodate evolving technologies.

Working to PAS 2030/2035 in accordance with England & Wales should assist, as the procedures have been well-tested and 'teething problems', where experienced, have now been overcome.

Finally a suggestion: Scottish Government might like to consider a public/private partnership where training is delivered in a competitive market to equip personnel with the necessary skills and achieve roll-out of the scheme successfully.

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