Domestic Energy Assessor audit requirements
England and Wales
Effective Date 1st June 2018

Audit volume

As specified in the government's Scheme Operating Rules, Elmhurst is required to undertake a desk based audit of at least 2% of all lodged EPCs (Energy Performance Certificates) ensuring that both 1% of each members work is audited with a minimum of one audit per member per year.

Audits of relodged EPCs are in addition to the 2% minimum.

Accuracy requirements

An EPC is "acceptable" if it meets all of the following requirements;

i)   On the balance of probability it accurately reflects the property being assessed. This includes the accuracy of the property description and recommendations included on the EPC;

ii)   The sum of the absolute errors between the Member's and Auditor's SAP score is less than 5 SAP points;

iii)   It meets the agreed Conventions for the assessment process;

iv)   It meets the appropriate evidence requirements for the strand.

If it fails to meet any one of these requirements it is deemed "defective".

Audit types

A mix of the following audit categories will be used to satisfy the 2% minimum sampling:

Periodic Random audits - These audits are to ensure that all members are audited over a defined time period and EPCs are randomly selected – this will help to maintain the overall quality of EPCs, ensure members are audited at an appropriate frequency and highlight new issues that may lead to the introduction of new 'smart' audits.

New Entrant audits- a new entrant is a member who has qualified and is joining a scheme for the first time (this is not an experienced member switching schemes). The scheme will audit this member's first lodged EPC.

Complaint audits - Audits that are undertaken due to a complaint from a stakeholder.

Non Periodic Random audits - Audits of randomly selected EPCs – this will help to maintain the overall quality of EPCs and highlight new issues that may lead to the introduction of new 'smart' audits as a result.

Smart audits - A smart audit is a 'risk based' audit based on pre-defined set of criteria.

- Smart audits are designed to find potentially defective EPC.
- Smart audit selection will focus on the data items, and associated evidence, relevant to the smart rule(s) that the lodgement has triggered.
- If a smart audit fails for a reason other than the smart audit rule that it triggered then, where possible, the subsequent follow on audit will be based on the same criteria that caused the fail.
- If an EPC is called for smart audit and triggered multiple smart audit rules, then it will be audited against them all but only counted as <u>one</u> smart audit.

- If a member passes a smart audit then, in a subsequent month, they trigger the same smart audit rule then they do not need to be audited as they have already demonstrated their competence on the issue.
- For a list of current smart rules please click [here](#)

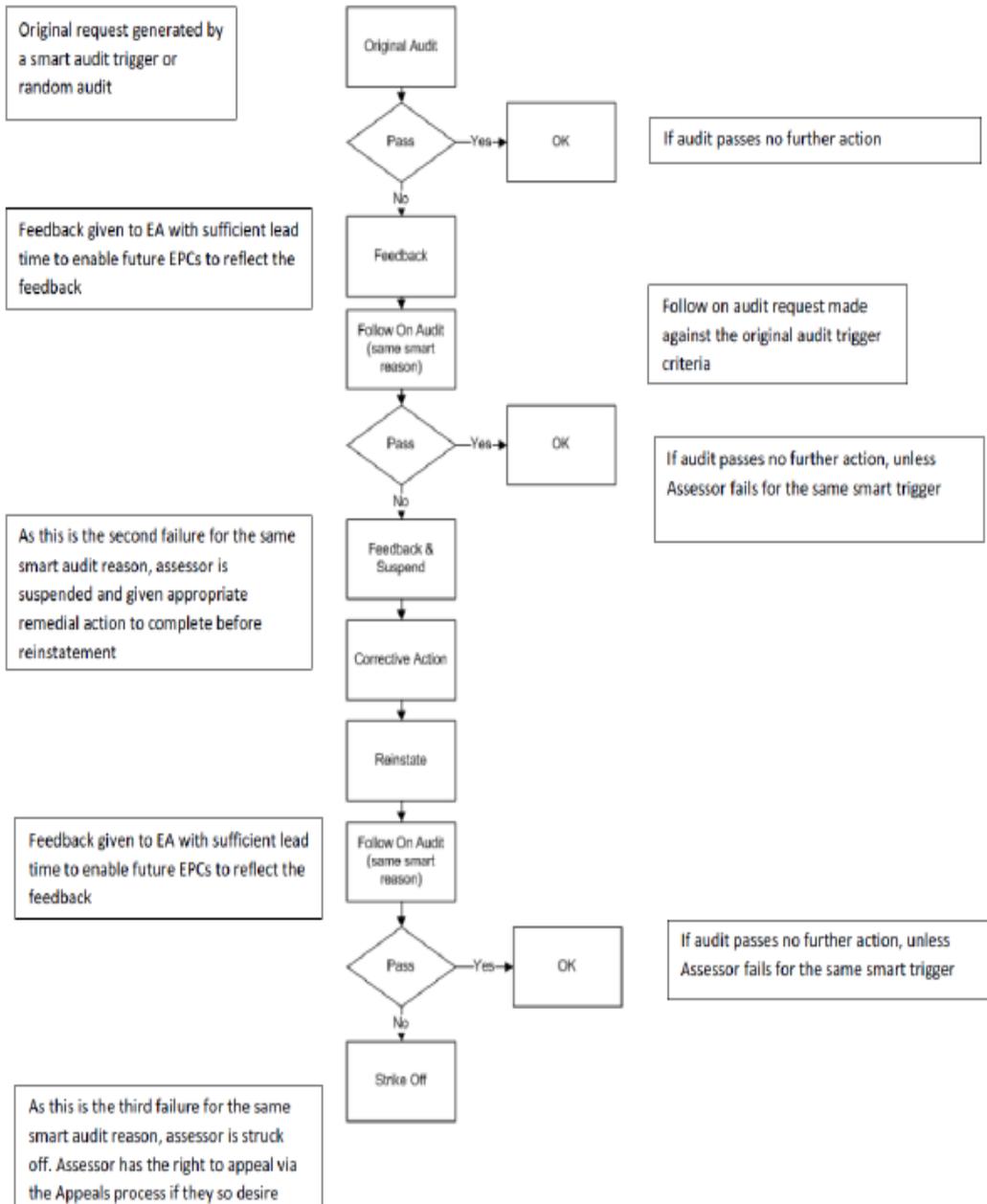**Follow on Audits** – are a consequence of failure of another audit type.

- A request for a specific future EPC for audit to ensure that the member has understood and is applying the knowledge/advice from the feedback provided.
- Follow on audits may be random or smart dependent on the original audit failure.

Re-lodgment Audits – Audits (not included as part of the 2% criteria) undertaken on an EPC issued as a replacement for a defective EPC.

Accompanied Visits - A member is accompanied to an assessment by an auditor. The auditor witnesses the work of the member, whilst at the same time undertaking their own assessment. After the accompanied visit has concluded, the auditor compares their calcuation with that of the EPC and identifies any differences between the two. The auditor shall also check, is so far as they can, that the member has met the requirements of the Code of Conduct.

Professional Interview – Elmhurst will discuss with the member Energy Certificates they have produced to validate the quality.

Audit process

Original request generated by a smart audit trigger or random audit

Original Audit

Pass —Yes→ OK

If audit passes no further action

No

Feedback given to EA with sufficient lead time to enable future EPCs to reflect the feedback

Feedback

Follow On Audit (same smart reason)

Follow on audit request made against the original audit trigger criteria

Pass —Yes→ OK

If audit passes no further action, unless Assessor fails for the same smart trigger

No

As this is the second failure for the same smart audit reason, assessor is suspended and given appropriate remedial action to complete before reinstatement

Feedback & Suspend

Corrective Action

Reinstate

Feedback given to EA with sufficient lead time to enable future EPCs to reflect the feedback

Follow On Audit (same smart reason)

Pass —Yes→ OK

If audit passes no further action, unless Assessor fails for the same smart trigger

No

Strike Off

As this is the third failure for the same smart audit reason, assessor is struck off. Assessor has the right to appeal via the Appeals process if they so desire

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Additional audits

In addition, members may be subject to additional audits where Elmhurst deems it necessary including reported malpractice or a request from a official public body such as MHCLG.

Provision of evidence

Requests for audits will normally be sent out to members via e-mail. Requests and reminders can also be tracked via Elmhurst's *QA Hub*.

Members must ensure that all necessary evidence is submitted to Elmhurst **within 15 working days** of the initial request.

Evidence should be submitted via Elmhurst's *Evidence* portal or the *QA Hub* in order to ensure safe and prompt receipt.

The submission deadline can be extended in cases where the member is, or will be, late for justified reasons. Justified reasons may include a period of inactivity, extended illness, holiday or similar.

An extension may be allowed to cover a period of up to working 5 days after the member's return to work. In order for this to be considered, the member must contact Elmhurst prior to the expiry of the initial fifteen working day period.

Should a member fail to provide satisfactory evidence by the required deadline, membership will be suspended. The suspension shall only be lifted when the member provides a 'reasonable and compelling' case as to why the information is not available. An example of a 'reasonable and compelling' case for example, would be where there is a specific client requirement that no photographs be taken.

Where a member does not respond to an audit request they will remain suspended. If there is no acceptable explanation for the delay Elmhurst may then impose further sanctions on the Member.

Audit feedback

In all instances Elmhurst will provide feedback to the member via e-mail. This feedback may also be accessed via Elmhurst's *QA Hub*.

Consequences of audit failure

Where the EPC has been identified as defective the member will be given feedback on why, and details of what remedial action is required to correct the issue and prevent reoccurrence. If the error suggests this may not be an isolated instance the member may be suspended until suitable corrective action has been completed and Elmhurst is confident the issue will not reoccur.

After the member has undertaken corrective and preventive action the member will be subject to an appropriate follow-on audit.

If an audit identifies suspected fraudulent practices, the member will be suspended immediately pending further investigation. The duration of the suspension will be determined by the progress of the investigation, the results of which will be reported to MHCLG

Failure to provide evidence of sufficient quality

Where an audit cannot be completed due to unsatisfactory evidence (e.g. missing or poor quality photographs or site notes), the audit will be recorded as a fail. The member will be informed of the shortcomings and given instructions as to how to improve their future evidence submissions. Elmhurst will undertake a follow on audit of the member.

If the follow on audit fails, due to a failure to provide evidence of sufficient quality, Elmhurst will suspend the member. The Accreditation Scheme shall investigate the reason, and impose appropriate measures.

Failure to visit the property

Where there is evidence that a member has failed to visit a property when required, the member will be suspended pending investigation which shall include:

i) Discussions with the member,

ii) A review of all photographic evidence provided by the member for auditing purposes over the past two years and

iii) A review of other evidence available to Elmhurst, including any evidence provided by the member.

iv) If appropriate, a face to face professional interview or accompanied site visit.

The use of photos that do not relate to the property being assessed (sometimes referred to as "stock photos") is an indicator that the property has not been visited.

Members shall only be reinstated if Elmhurst is confident that corrective action has been successfully completed and there is unlikely to be a future reoccurrence.

Elmhurst may then, at its discretion, undertake additional level of audit and surveillance to identify future re-occurrence e.g. all subsequent random sampling of EPCs audited for the next two years shall include special analysis of photographs.

If the member has not visited a property, as required, then the member will have their membership revoked.

Replacement of defective EPCs

If an EPC is deemed to be 'defective' the member will be informed and a re-lodgement of the EPC will be required. The member must notify Elmhurst of the RRN of the replacement EPC in order that the original EPC can be made 'not for issue'.

The member must ensure that the mandatory re-lodgement is completed **within 10 working days** of notification. Failure to comply within this timescale will result in the suspension of the member and continued refusal to replace the defective EPC may lead to the membership being revoked.

Where a member replaces a defective EPC, the replacement EPC will be audited by Elmhurst.

Appealing an audit result

To gain maximum value from the audit process Members are encouraged to read the feedback and, if necessary, call our Technical Support team to test their understanding.
A Member wishing to appeal the outcome of an audit should do so via Elmhurst's online QA Audit appeal form which can be found in the 'Contact us' section of our website. Please note that Elmhurst reserve the right to charge an administration fee where an appeal is unsuccessful.

Upon receipt, the appeal will be reviewed by an independent member of the Support Team. If the original feedback is considered to be incorrect, the audit result will be overturned. However, where the original audit feedback is found to be correct, the appeal will be rejected and the audit result will be upheld.

In the event that the Member is dissatisfied with the outcome of the appeal, the matter may be referred to the relevant Team Leader for review, and their decision will be final and binding.