

Accreditation Schemes – QA Audit Policy

Audit Process and Sampling Rates

For the purposes of the QA Policy:

The Calendar Year	1st January to December 31st
Half Year (2 periods in a calendar year)	1st January to June 30th and 1st July to December 31st
Quarter (4 periods in a calendar year)	1st January to 31st March, 1st April to June 30th, 1st July to September 30th and 1st October to 31st December

Audit Classification

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

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

New Entrant – 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). We will audit this member’s first lodged Energy Certificate.

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

Re-lodgement Audits - Audits that are undertaken due to a defective Energy Certificate being identified and the ‘replacement’ certificate is audited to ensure it is now correct.

- Members must re-lodge an Energy Certificate where an earlier Energy Certificate was found to be defective.
- The member must ask the scheme to mark the defective Energy Certificate as ‘Not for Issue’.
- If an Energy Certificate is still found to be defective after it is re-lodged the member must re-lodge the Energy Certificate until it is correct. The Member must ensure the earlier defective Energy Certificate is marked as ‘not for issue’.

Smart audits

- A smart audit is a ‘risk based’ audit based on pre-defined set of criteria.
- A smart audit is designed to find potentially defective Energy Certificates.
- A smart audit will focus on the data items and associated evidence related 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 the subsequent follow on audit should be based on the same criteria that caused the fail.
- If a lodgement is called for smart audit and triggered multiple smart audit rules then it should be audited against them all but only counted as one smart audit.
- If a smart audit has a volume set, e.g. 10 or more in a month, then Accreditation Schemes will select one of them to audit.
- If a member passes a smart audit, then in a subsequent month, they trigger the same smart audit trigger (rule number) then they do not need to be audited, as they have demonstrated their competence on the issue.
- Smart Audits should aim to ensure that the incidence of erroneous ‘multi lodgements’ on the same property are minimised.

Follow on audits

These audits are a consequence of failure of another audit type 1. Accreditation Schemes will request a specific future lodgement for audit to ensure that the member has understood and is applying the knowledge/advice from the feedback provided.

- A follow-on audit as a result of a random audit failure can be a randomly selected audit or an audit appropriate to the failure of the original random audit.

- A follow-on audit as a result of a smart audit failure should be a lodgement that triggers the same smart audit rule. The follow-on audit will be carried forward until such a lodgement takes place in a subsequent month.
- A follow-on audit as a result of a new entrant failure can be a randomly selected audit or an audit appropriate to the failure of the original audit.

Submission of Audit Evidence

Audits requests will be made daily to assessors until their minimum audit percentage is met. The deadline for submission of audit evidence is 15 workdays after the date requested. The EA's accreditation will be suspended if the audit evidence is not received within this timescale. The audit will be marked as 'Fail' and one further follow on audit will be requested.

Audit evidence is to be uploaded onto AssessorHub by the EA; please note, those using the iPad software to complete EPCs do not need to upload their evidence as ecmk already have access to this however EAs are given a further 5 days to upload any further evidence onto Assessor Hub if they wish

Failure to Supply Evidence in Response to an Audit Request

In the case that the EA does not respond to an audit request or does not supply sufficient evidence to allow a QA Audit to be conducted by the deadline, the EA's accreditation will be suspended, and the assessor informed. The accreditation will only be reinstated if the EA can provide a reasonable and compelling case as to why sufficient evidence is not available. All cases must be evidenced to ecmk's satisfaction, may be investigated and will be recorded. ecmk will record the dates associated with the request for evidence and when the reason was reported, the reason given for late or missing evidence and ecmk's evaluation of the reason given. Claims that are found to be willfully fraudulent will result in the EA's accreditation being suspended pending further investigation and may result in the accreditation being revoked.

A reasonable and compelling case, for which the assessor has no control, such as refusal for photographic evidence to be taken for example at a military installation, will not warrant further monitoring. A case over which the assessor does have control, such as camera malfunction, will be recorded and monitored. Repeat occurrences of such events i.e. that same problem being reported within a 12-month period will result in the assessor's accreditation being suspended and an investigation by ecmk. The assessor's accreditation will only be reinstated once ecmk are satisfied that appropriate measures have been taken to prevent a repeat occurrence of the issue.

Late submissions may be subject to further investigation.

If sufficient evidence is not supplied or the submission is late for a random audit, the EA will be subject to an additional follow on audit upon re-activation of their accreditation status. This will be selected from the next submission to the central register.

Non-provision of evidence for a follow on or customer complaint audit will result in suspension of the EAs accreditation but will not trigger additional audit requests as a matter of course. Additional audits may be requested upon reinstatement of the EA's accreditation, at ecmk's discretion, in these circumstances.

Use of Stock Photos

‘Failure to Visit Site’ will normally mean that an EA has either not visited the building being assessed on the recorded date of assessment or did not gain access to the building such that an adequate assessment was possible on the date stated on the certificate.

An example of an exception to this may be where a derelict building, posing a health and safety risk to an EA requires an EPC to comply with legislation for sale. In such a case the EA must visit the building and evidence why suitable access was not attainable. Justification for any assumptions including ‘worst case scenario’ decisions must be documented in site notes.

In the case of a DEC renewal, ‘Failure to Visit Site’ includes instances where adequate assurances that there have been no changes to the building, its operation or services have not been obtained and a DEC has been produced without a site visit.

A ‘Stock Photo’ is a photograph which depicts an evidence item but is not an authentic or untainted image of the evidence item in-situ within the specific building as assessed.

A random 2% of audits conducted by ecmk will be checked for the use of ‘stock photographs’ by comparing the evidence submitted for audit to evidence submitted for audits spanning a period of no less than 1 year (where available).

The use of stock photos or failure to visit site are forbidden except in the case that an assessment has been conducted as part of a Multiple RdSAP EPC Production in accordance with ecmk policy (ACC-407).

In all other circumstances the identification of the use of stock photos will result in the EAs account being suspended pending further investigation which will include:

- Discussion with the EA
- A formal interview with the EA
- A review of all photographic evidence previously provided by the EA for audit (this may be capped at a historical period of 2 years at ecmk’s discretion)
- A review of any other evidence available to the scheme
- A review of any evidence the EA believes to be relevant

In these cases, the EAs account will only be reinstated if:

- ecmk are satisfied that the EA is, and has been, visiting buildings where required
- Any use of stock photographs has been deemed accidental with no intention to mislead
- The EA has not been previously suspended for the use of stock photographs and makes a written commitment not to use stock photographs and that they understand the definitions and restrictions of the use of stock photographs.

If the EAs accreditation is reinstated following a suspension on suspicion of the use of stock photographs, the assessor will be on a heightened audit rate of a minimum of 10%. In addition all QA audit checks will include checks for the use of stock photographs for a minimum of 12 months following reinstatement of the EAs lodgement facility.

If the EAs accreditation is not to be reinstated in accordance with the stipulations above the member’s accreditation will be revoked and all other schemes informed, for clarity this will include all instances where the EA is found to have been maliciously neglecting to visit site.

Audit of Defective Assessments

Wherever an assessor has noticed an error and subsequently a lodged a replacement certificate it is the EAs responsibility to inform ecmk of the error and the RRN for the original and replacement certificates. ecmk will mark the original incorrect certificate as 'not for issue' at the central register and remove that RRN from the audit pool i.e. that RRN will not be called as a random audit.

Where an EA has failed to inform ecmk that a lodged certificate has been replaced and the RRN is called for audit, the audit will be conducted against that original certificate and failed if found defective, regardless if a new certificate has been completed after the audit request.

The Audit

The report will always be audited using the calculation methodology, software version and conventions that were in place at the time of the on-site assessment which may not be the lodgement date of the certificate. The audit itself will identify any entries to the software that, in the opinion of the auditor, are incorrect. This may be because the entry is not supported by the evidence, because of a misunderstanding of the methodology by the member or because of a simple entry or calculation error. The auditor will recreate the EPC/DEC/Report, correcting each incorrect entry in turn and adding the absolute differences in the energy efficiency rating and/or BER rating, if appropriate, associated with each error. For clarification, if one correction results in a difference of +2 and another gives -2, the absolute error is 4, not zero.

The auditor may also decide that the supporting evidence is of poor quality, for example that the photographs are indistinct or blurred, or too small clearly to determine what is being shown, or that the floor plan sketch is not easy to interpret.

The possible outcomes of an audit are:

- “Pass”
- “Fail no re-issue required”
- “Fail re-issue required”

Strand	Failure Benchmark
Domestic	Greater than 5 SAP Points*
Non-Domestic EPC	Within 10% of the ‘true’ BER*
DEC	Within 5% of the OR Rating
On Construction	Within 4% of the DER

* The result of the current, approved RdSAP software output is such that a recorded variance will always be a whole number and therefore a variance of 5 will be a ‘Pass’ and a variance of 6 will be a ‘Fail’, however assessors should be aware that the ‘true’ pass result is a variance of 5.4 or less and a variance of 5.5 or more would be a ‘Fail’ result. For a non-domestic EPC with a BER ≤ 50 the benchmark is +/- 5 kgCO₂/m²

Please note: There are other reasons for audit failure including failure to follow conventions and inappropriately handling recommendations or includes changes to the recommendations and/or description of the EPC in a manner which brings into question the accuracy of the rating. In the case of Air Conditioning Inspection Reports, failure to comply with the requirements of the scheme or TM44 will result in audit failure.

Feedback of QA Results to Assessors

Feedback containing the results of the QA assessment will be sent to the assessor by e-mail using the most recent address they have provided to the accreditation department at the time the feedback is being sent. Assessors will receive feedback for each audit conducted regardless of the trigger for which the audit is called.

The audit feedback will be accessible via AssessorHub. The audit feedback e-mail will reference the RRN and address of the certificate that has been audited, the result of the audit and any deadlines applicable.

Poor Quality of Evidence

If evidence is received that fails to meet the required standard the audit result will be marked as 'Fail' and a view taken as to whether the report is also 'defective'. Evidence received after the 15 day deadline will only be taken into account if it proves that the EPC is not 'defective' but cannot under any circumstances affect the 'fail' result.

Pass

If evidence is received that fails to meet the required standard the audit result will be marked as 'Fail' and a view taken as to whether the report is also 'defective'. Evidence received after the 15 day deadline will only be taken into account if it proves that the EPC is not 'defective' but cannot under any circumstances affect the 'fail' result.

Failed - Defective
If an audit result is "Failed –re-issue required", we will require the member to re-submit the EPC/DEC/AR/Report within ten working days from the feedback being sent with all errors corrected. The re-lodgement period may be extended if the audit result is appealed, or the EA needs to arrange for a re-visit to site in order to accurately correct the defective certificate; in the case of a site re-visit the EA must obtain written authorisation for an extension to the re-lodgement period from ecmk and give details of the appropriate arrangements.

The EA must provide ecmk with the RRN of the replacement certificate and the associated amended data file. If a re-visit to site was required, then any supplementary site notes and/or photographic evidence to support the re-lodgement must also be provided. At this point the RRN for the defective certificate will be marked as 'not for issue' on the Landmark central register. The re-submitted EPC/DEC/Report, amended data file and any supplementary evidence will then be audited.

The requirements for re-lodgement of defective certificates including associated deadlines will be included in the audit feedback e-mail.

All costs associated with the re-lodgement of a defective certificate, including costs associated with replacement certificates lodged on the EA's behalf, are the sole responsibility of the EA under whose accreditation the defective certificate was lodged. ecmk reserve the right to make additional charges when auditing the replacement of a defective certificate.

If we do not receive the replacement RRN within the time allowed, without a reasonable justification which we can accept, the member's accreditation will automatically be suspended until the EPC/DEC/Report has been re-submitted and the member has informed us of the replacement RRN. If a member's accreditation remains suspended for 6 months from the initial audit failure, the member's accreditation will be revoked.

In either case we will monitor the member's audit results over the next six months at an increased random audit rate to assess the effectiveness of the remedial action. If we see that it has been effective i.e. the issues surrounding the audit failure have been resolved, the member will return to the minimum random audit rate. If it has not been effective, further remedial action will be necessary which may include a member's accreditation being revoked.

Auditing of Replacement Certificates

Certificates lodged to replace a defective certificate will be audited. If the replacement certificate fails, the assessor's accreditation will be suspended until ecmk has investigated the likelihood of further defective certificates being lodged. If the assessor's accreditation is reinstated following such a suspension, they will be subject to a failure review and compulsory CPD completed, in relation to the audit failures.

Where there is the requirement to replace a defective certificate ecmk will make every reasonable effort to contact the member responsible by means of e-mail, telephone or letter using the most recent contact information provided to ecmk in writing which is held on the www.assessorhub.net

If the EA responsible for replacement of a defective certificate cannot be contacted, is no longer operating as an EA, has failed to replace the certificate within 60 days of the initial audit failure without prior agreement or formally requests it (in writing) ecmk will arrange for the defective certificate to be replaced on the EA's behalf by nominating an appropriately qualified ecmk accredited member to undertake the re-lodgement. This may require a site visit by the nominated assessor. All costs associated with defective certificates replaced in this manner are the sole responsibility of the EA under whose accreditation the defective certificate was lodged.

Costs incurred in arranging the replacement of defective certificates on a member's behalf may be added to the member's account with ecmk and invoiced directly to the EA whether or not they are still practicing as an EA and/or accredited with ecmk. Full payment of these costs may be required before a member's accreditation is re-instated. These costs will be reasonable and kept to a minimum but may include:

- Administration costs
- Central register lodgement fees
- Costs associated with site visits including nominated EA's time and mileage
- Costs associated with the audit of the replacement certificate

Costs will be publicised on the ecmk website, included in documentation sent with defective audit feedback and communicated to the EA responsible for payment of the charges by e-mail or letter using the most recent contact information provided to ecmk in writing by the EA which is held

Other than the costs stated above, the EA responsible for lodgement of a defective certificate shall have no further responsibility for the replacement certificate.

Failed – Insufficient Evidence

If the auditor decides that there is insufficient supporting evidence to complete the audit, or that the evidence is not of sufficient quality, they will mark it as “Fail”. This will result if there are elements affecting the determination of the ‘truth’ for which there is insufficient information to establish variance and for which there is not a default value for the input data to be compared to. The audit will be reported as ‘defective’.

We will request one further ‘follow on’ audit from any subsequent lodgements made after the audit feedback. If this audit is a “Fail”, the member’s accreditation will automatically be suspended, and we will recommend remedial action to be completed before their accreditation is re-instated.

If this follow-on audit cannot be completed due to a lack of evidence provided by the assessor, ecmk will suspend the members accreditation until such time as sufficient evidence is provided or that there is a reasonable explanation as to why the evidence is not available in line with ‘failure to submit sufficient evidence’ and that steps have been taken to prevent any re-occurrence.

In either case we will monitor the member’s audit results over the next six months at an increased random audit rate to assess the effectiveness of the remedial action. If we see that it has been effective i.e. the issues surrounding the audit failure have been resolved, the member will return to the minimum random audit rate. If it has not been effective, further remedial action will be necessary which may include a member’s accreditation being revoked.

Failure Reviews

Failure of a random and follow-on audit will result in a ‘failure review’. This will be conducted when QA Audit the subsequent targeted reports has been completed and any relevant appeals have been closed. The intention on the failure review is to identify the reasons for audit failure and identify any common errors, any outstanding actions, areas where the EA may need additional guidance, the likely hood of further defective reports being lodged and any perceived training needs.

The EA will receive an e-mail detailing the findings of a ‘failure review’ including any follow up actions to be taken (either by the EA or ecmk).

Sampling Rates

ecmk are required to audit a sample of 2% of all EPCs lodged with the Scheme. We will audit individual members at a minimum rate of 0.5% over a year. Under certain circumstances (detailed within this document) individual members may be audited at higher rates for a period and may be subject to additional audits over and above the minimum random sample.

Follow on, re-lodgement and customer complaint audits do not count towards these sampling rates. If a follow-on audit, following an audit failure are passed, that assessor shall revert to the random auditing rate in place before the audit failure.

ecmk reserves the right to request that the overall random sampling across the scheme be temporarily suspended for a particular calendar month in extreme circumstances. Such requests may only be granted directly by MHCLG and will not normally impact on individual audit requirements of EAs.

Random Auditing Rates for New, Inactive or Transferring Members

For the purpose of this policy, a 'New Member' is defined as an EA who is newly qualified and/or for whom accreditation with ecmk is their first membership of an EPBR approved accreditation scheme. For the purpose of this policy, an 'Inactive Member' is defined as an EA who has not lodged a certificate to the central register within the six preceding calendar months.

New Members and Inactive Members will be subject to a new entrant audit rule. For New Members this will mean the first assessment lodged will be audited. The audit will be a full audit with a follow on should there be any failures.

A member transferring from another EPBR approved accreditation scheme(s) who are not currently subject to increased QA checks by any scheme(s) shall be subject to ecmk's minimum random audit requirements. In all other cases members transferring to the ecmk accreditation scheme will be subject to the new entrant audit rate.

Excessive use of Helpdesk

Use of the helpdesk is expected, especially when dealing with unusual buildings, changes to convention/methodology or non-standard heating systems and configurations. However if a member is deemed to be using the helpdesk excessively for information such as to cause a concern that they are at a high risk of producing erroneous EPCs, the EA will be subject to an increased audit rate until the scheme are satisfied with the EA's knowledge and understanding. Please refer to 'ACC-336 Helpdesk Checks' for further information.

Customer Complaints

A customer complaint about an EPC will normally result in a customer complaint audit being called for the EPC about which the complaint has been made; however, this will not be the case where the complaint points to a cause beyond the control of the assessor such as an in-built software issue.

High Lodgement Rates

ecmk do not wish to discourage high lodgement numbers through their scheme, however there is a potential for volume to compromise quality and therefore excessively high lodgement rates are monitored. A high lodgement volume is considered to be 120 lodgements or more in any one calendar month. If you believe that you will be producing lodgement numbers in excess of 119 either in a single calendar month or on a regular basis, please contact ecmk who will be happy to discuss ways in which we can work together and be satisfied that quality is not being compromised. ecmk would prefer to work with EAs and organisations in this regard however we will monitor EPC through put and will check high lodgement numbers by checking the geographical location of EPC produced in the same day or in quick succession to test whether the logistics of the EPC production are feasible and also by calling targeted audits to check that stock photographs are not being used.

Members about whom ecmk has Concerns

ecmk may have cause to be concerned about the competence of a member for a number of reasons. ecmk may raise the rate of random audits for these members or schedule additional Smart audits over and above the random samples, according to the perceived risk of the member producing an erroneous EPC. The member will return to the minimum rate for random audits when ecmk is satisfied that the member is no longer a cause for concern.

Audit Requests Specified by DLUHC

DLUHC may instruct ecmk to conduct an audit on a specific EPC lodged through the scheme. If an audit is called it will be treated as a Smart audit.

Evidence Required for Audit

For each strand there is a different requirement on the evidence required. When deciding if evidence is required, the members need to think about how they supply enough evidence for an independent third party to recreate the EPC/DEC/Report without visiting site.

You need to refer to the relevant guide, available at www.ecmk.co.uk under Evidence Required for Audit for further specific information.

Audit of Defective Assessments

Wherever an assessor has noticed an error and subsequently a lodged a replacement certificate it is the EAs responsibility to inform ecmk of the error and the RRN for the original and replacement certificates. ecmk will mark the original incorrect certificate as 'not for issue' at the central register and remove that RRN from the audit pool i.e. that RRN will not be called as a random audit.

Where an EA has failed to inform ecmk that a lodged certificate has been replaced and the RRN is called for audit, the audit will be conducted against that original certificate and failed if found defective, regardless if a new certificate has been completed after the audit request.

Monitoring of Defective Certificates

The percentage of random audits returned as defective by the QAAs is monitored in process 'ACC-309 Monthly QA Returns' and its subsidiaries (a),(b),(c) and (d). Where this percentage falls outside of the 5% target set by DLUHC for any one month the Scheme Manager will determine appropriate action and communicate this to DLUHC. Such action may include measures such as an escalation of the auditing regime or targeted mandatory training for assessors which may be charged for.

Change History Record

Version	Description of Change	Editor	Date of issue
3.0	Re-Write	Kirsty Deighton	13/09/2019
4.0	Document Review	Stephen Farrow	08/01/2020
4.1	Periodic Review	Joe Mellon	08/11/2021
4.2	Update MHCLG to DLUHC and Minor changes	Joe Mellon	15/08/2022
4.3	Periodic Review and formatting	Joe Mellon	05/03/2024
4.4	Document Review	Ian Rowley	07/11/2024