



Architectural EPC

On Construction Domestic Energy Assessment

AUDIT PROCEDURES

VERSION 1.0 - March 2011

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Scheme Management

APEL Assessment Panel	The Panel is made up of Chartered Members of CIAT and/or RIBA/RSUA/RIAS who are also either Members of a CLG recognised Accreditation Scheme or can demonstrate that they have obtained equivalent competency within that of a CLG recognised Accreditation Scheme. The Assessment Panel's role is to review all APEL applications. A minimum of two Assessors will review each application.
Audit Panel	Chaired by the Scheme Director, Auditors are appointed by the Review Panel.
Conduct Panel	The Panel established to consider allegations of breaches of the Code of Conduct and to agree actions in relation to the complaint in accordance with the Conduct and Disciplinary Procedures.
Review Panel	<p>The Panel consists of the Scheme Director, a senior member of staff from CIAT or RIBA/RSUA, a senior member from CIAT, a senior member from RIBA/RSUA and a representative of Just-Ask Services Limited.</p> <p>The Panel has responsibility for the smooth delivery of the Scheme, monitoring the work of the administration and Audit Panels.</p>
Scheme Director	Responsible for directing the work of the Scheme Administrator preparing reports for CIAT and RIBA/RSUA, liaising with CLG/DFPNI.
Scheme Administrator	Responsible for day to day administration of the Scheme.
System Manager	Applications Manager responsible for the management of the online data infrastructure.

Purpose of Auditing

The primary reason for auditing On Construction Domestic Energy Assessors (OCDEAs) is to ensure that as far as is possible every OCDEA is working within the Scheme's Code of Conduct. Transgressions of the Code will be categorised as Minor, Significant or Major in line with CLG and the Scheme requirements.

This document deals with the procedures that are in place for auditing OCDEAs. The audit process will inform The Scheme with regard to:

- The activities of individual OCDEAs relative to their own Quality Assurance Procedures
- That individual OCDEAs have undertaken full and adequate CPD
- That individual OCDEAs have maintained adequate PI Insurance

In addition the audit process will inform the Scheme:

- Whether the competency tests accurately reflect the competencies needed by OCDEAs
- Of the overall competency of OCDEAs
- What addition CPD may be of benefit to OCDEAs

Where instances of poor practice and transgressions are found steps will be taken to ensure OCDEAs undertake additional training. If necessary an OCDEA can be suspended until those remedial steps suggested are acted upon.

Where instances of malpractice are found, immediate steps will be taken to prevent the OCDEA from continuing to lodge EPCs and that their Professional Body, relevant local authority(s) and police are informed as may be relevant, in line with the Scheme Guide.

On Construction Domestic Energy Assessors

OCDEAs must cooperate with the audit process and provide the information required by the auditors. OCDEAs must make themselves available for interview. Interviews take place at the head office of CIAT, the office of the OCDEA or at a mutually agreed third location.

Trigger Points

As part of their duties the Review Panel will agree a program of auditing, based on the number of OCDEAs and the number of EPCs issued under the Scheme.

There are a number of additional triggers for an audit:

- A complaint or allegation of misconduct which is deemed serious enough by the Scheme Director to merit an audit
- A routine Quality Check of an Energy Performance Certificate is more than +/- 4% of the true result
- A recommendation by the Review Panel that an OCDEA be audited as a result of a previous audit
- A sudden shift in the pattern of lodging EPCs by any one OCDEA which suggests that full assessment is not achievable in the timescales available.

The Audit Process

The audit process itself is broken down into 4 stages

Stage 1: Profile

Prior to meeting or corresponding with the OCDEA, the Scheme Administrator will prepare a short report for each identifying:

- The key dates in the OCDEAs membership process
- Confirmation of the OCDEAs test record (number of attempts overall marks etc)
- Number of EPCs lodged and for what type of project
- Details of the PI Insurance held on record
- Details of any complaints made and the steps taken to resolve them
- Details of any invalid EPCs that have been corrected
- Details of any EPC Quality Checks
- A copy of any previous audit reports
- Copies of any relevant correspondence with the OCDEA

The Scheme Administrator will then contact the OCDEA to advise them that they are due to be audited and request information. The OCDEA will be asked to provide copies of their:

- current PI Insurance certificate if this is not already on file
- CPD log book if this is not already on file.

Prior to the audit the Auditors will map out their audit plan (based on the audit report template) including any areas of specific concern that the Scheme Administrators report raises to allow them to structure the audit and record their findings as they progress through each stage.

The OCDEA will be provided with a copy(s) of the audit plan prior to the audit and referred to this guidance so that they can prepare for the audit.

Stage 2: Procedural

Audits can take place either at the OCDEA offices, at CIAT headquarters in London or at a mutually convenient location. The preference in the initial phase of auditing is at the OCDEA's office as all the documentation that is required for an audit *should* be available and this allows the Auditors to assess the overall working arrangements, access to documents, IT systems etc of the OCDEA.

The procedural part of the audit concentrates on the Schemes Code of Conduct, the QA procedures that the OCDEA has in place and how they have dealt with any complaints made against them.

The auditors will be looking to see that the OCDEA has adequate procedures in place and has kept full records of the EPCs that they have produced.

This stage of the audit will take the form of an interview led by one of the Auditors with the OCDEA, with the OCDEA log book, and job files etc to hand.

Stage 3: Technical

The third stage of the audit is to look at a number of individual EPCs that are representative of an individual OCDEAs work and check:

- a) The accuracy of the EPC,
- b) Whether sufficient information is available to fully undertake a SAP calculation and that this has been recorded in the log book
- c) Whether the correct software / version have been used in the assessment
- d) If the OCDEA had a wider role than just preparing an EPC
- e) For confirmation of the contractual relationship between the OCDEA and the building owner/ developer

This stage of the audit will be conducted by the Auditors without the OCDEA being present.

Stage 4: Reporting

At the conclusion of the audit the Auditors will give the OCDEA a short verbal summary of their findings and comments, based on the audit template and their notes. The OCDEA will be offered the opportunity to make or raise any points that they feel are appropriate.

The Auditors will, as soon after the audit as possible, produce a draft report based on the audit template and their audit notes. This draft report will be forwarded by the Scheme Administrator to the OCDEA who will be given the opportunity to comment on any statements that they believe to be incorrect.

The Auditors will then finalise their report. The Review Panel will be asked to accept or amend the Auditors comments as appropriate.

The final report will then be sent to the OCDEA and a copy added to the OCDEA's file. Copies of all audit reports will be made available to CLG on request / at the Scheme Providers audit.

The Auditors' comments will be broken down into:

- Non-compliances
- Observations
- Minor, Significant and Major Transgressions of the Code of Conduct
- Requirements and
- Recommendations

Depending on the severity of these the Review Panel can attach time limits by which the OCDEA must comply.

Should, as a result of the audit, the Auditors have an immediate and significant cause for concern (such as there being no proof that PI Insurance is in place) they will be able to raise this with the Scheme Director who can immediately suspend the OCDEA pending disciplinary proceedings

Outcomes

The Review Panel can endorse / amend the Auditors' comments to include one or more of the following:

1. No immediate action required
2. Additional training / CPD recommended
3. OCDEA is required to amend their current procedures
4. OCDEA is required to add to their current procedures and provide evidence thereof
5. 2, 3 or 4 above and re-audited within a period of time set by the Review Panel (unless an audit is triggered by subsequent action or complaint) in line with the guidance below
6. 2, 3 or 4 of the above and suspension pending a re-audit within a period of time set by the Review Panel (unless an audit is triggered by subsequent action or complaint) in line with the guidance below
7. Suspension due to serious misdemeanour and referral to OCDEA's professional body, police as appropriate.

In reviewing the comments of the Auditors regarding each OCDEA the Review Panel will seek to ensure consistency across all audits.

Appeals

An OCDEA is entitled to appeal against any statement, conclusions and recommendations made by the Auditors.

The Appeal is to be assessed by the Audit Panel.

The Auditors

Each OCDEA will be audited by 2 auditors until a benchmark for auditing is established by CLG. Audit teams must include:

- At least one OCDEA or equivalently qualified individual (such as an Approved Certifier of Design (Scotland, Section 6 – Energy) Domestic)
- A senior practitioner with experience in managing an architectural practice or similar business / department

Every Auditor must declare if they have any conflict of interest or substantive reasons why they should not audit any particular OCDEA. For example it would be inappropriate for an Auditor to audit their biggest rival in their local area.

The Review Panel will seek to balance the convenience of travel with independence when establishing the audit program.

The Review Panel will review the audit procedures, including this document after the initial round of audits and on an annual basis thereafter.

The Auditors will be drawn from the members of the Scheme, senior members of CIAT / RIBA / RIAS and other such bodies as the Scheme Director deems suitable.

Auditors must undertake to treat any commercially sensitive information in complete confidence.

Objecting to Auditors

OCDEAs may object to the appointment of particular Auditors in advance of the audit stating reasons for objection and which might result from:

- A perceived conflict of interest
- A current or previous working relationship
- Direct competition

An objection to a particular Auditor must not become a material consideration in the subsequent audit and OCDEAs have a duty to highlight to the Scheme Director where there may be conflicts of interest that the Auditor may not be aware of.

The Scheme Director should take suitable steps to ensure alternative Auditors are appointed in a timely manner.

The Scheme Director may however take action if there is reason to believe that an OCDEA is deliberately objecting to Auditors as a mechanism to delay or avoid audit.

Guidance for Auditors

It is anticipated that with time the Scheme Auditors will build up considerable experience and develop further guidance.

This section deals with the thresholds where the Auditors should be considering including Non-compliances, Observations, Transgressions, Requirements or Recommendations within their report.

In considering if a threshold has been met an Auditor should consider any previous audit reports that there may have been and pay particular attention to any issues that were highlighted.

If a previous audit report included a requirement to address an issue within a time limited period and it is shown on a subsequent audit that it has not been addressed, the requirement should be upscaled to non-compliance.

Equally where previous recommendations, requirements and non-compliances have been addressed this should be recognised as a positive improvement.

Auditors must also judge whether a lack of evidence is a failure of procedure / technical competency or is representative of a deeper problem.

For example if an OCDEA is unable to produce a PII certificate due to an administrative / staffing issues the Auditors must at the very least record a non-compliance with a requirement for a Certificate to be produced within 7 days. If however the Auditors have reasonable cause to think that the OCDEA is in fact uninsured they must report this immediately to the Scheme Director who must immediately suspend the OCDEA.

Each Element of the audit can be scored using the following matrix:

Audit Issue	Excellent	Good	Acceptable	Cause for Concern	Non-compliant
Professional Indemnity Insurance	In place			Not available on request	Suspicion PII not in place IMMEDIATE SUSPENSION
Code of Conduct	No Breach of Code		Minor Transgression	Significant Transgression	Major Transgression IMMEDIATE SUSPENSION
QA Procedures	Well developed procedures in place and evidence that they are being followed	Procedures in place and evidence that they are being followed but improvements possible		Poor QA procedures and patchy evidenced that they are being followed	No procedures in place
Log Book	Present and complete	Present with few omissions	Present with some omissions	Present but largely incomplete	Not present
Records of projects being kept	Present and complete		Present with few omissions		Not present or present but largely incomplete
Internal complaints procedure	Present and well developed		Present		Not present
Complaint Records	Complete				Not present
Dealing with complaints	Complaints dealt with quickly, procedures followed and records kept		Procedures followed and records kept	Poor records, lack of evidence of procedures being followed	Evidence that complaints have lain unaddressed

Regulations and reference materials available	Complete set of reference materials available	All key reference materials available	Majority of reference materials available	Key documents missing	No documents available
CPD Logbooks available	Present, well documented and demonstrating 10 hours + CPD		Present demonstrating 10 hours CPD achieved	Present, poorly documented or a shortfall in CPD hours	Not present
Response to previous audits	Issues resolved promptly		Issues resolved within time limits set	Partial or late action taken	No action Taken PREVIOUS ACTION POINTS UPSCALED
Technical competency	All EPCs within +/- 4% No self correcting errors in calculations present			All EPCs within +/- 4% Self correcting errors in calculations present	1 or more EPCs out with +/- 4%

Each outcome is colour coordinated:

	Urgent Action Required
	Requirement
	Recommendation
	Observations

Audit Outcomes

Immediate Suspension: If the Auditors believe that an OCDEA is uninsured they should immediately contact the Scheme Director and recommend immediate suspension.

P11 Insurance: If a P11 certificate is not immediately available, but the auditors have reason to believe one is in place they should recommend that the Scheme Director requires a copy within 7 working days under threat of suspension.

Urgent Actions: There are potentially 9 issues highlighted in red (plus where action has not been taken following a previous audit a requirement can be upscaled to an urgent action).

4 urgent actions are sufficient to prompt an immediate suspension of the OCDEA. The suspension should be lifted once the OCDEA has demonstrated compliance to the satisfaction of the Scheme Director.

1 urgent action or more requires a re-audit within 6 months.

Requirements: There are 10 potential issues highlighted in yellow. (plus where action has not been taken following a previous audit a recommendation can be upscaled to a requirement).

4 or more requirements requires a re-audit within 12 months

Recommendations: Any recommendations and observations are to be dealt with by correspondence between the Scheme Director and the OCDEA.

Appendix A - Report Template

Architectural-EPC – Checklist for Auditors

Member _____ No _____

Auditors _____ Date of Audit _____

1 _____

2 _____

Stage 1: Profile

Information Provided Prior to Audit

OCDEAs file	Yes / No
OCDEA on-line test record	Yes / No
EPC Quality Checks	Yes / No
Details of Checked EPCs	Yes / No / NA
Copies of QA checklist for each EPC	Yes / No
PII documents	Yes / No
Details of invalid EPC	Yes / No / NA
Previous Audit Reports	Yes / No / NA
Previous Complaints and resolutions	Yes / No / NA

Reason for Audit

- Failed EPC Quality Check
- Complaint
- Review Panel Recommendation
- Follow up Audit

Auditors Notes Prior to Audit

Stage 2: Procedural

E, G, A, C or N

Log Book in place	Yes / No	_____
Records of projects being kept	Yes / No	_____
QA procedure in place	Yes / No	_____
Internal complaints procedure in place	Yes / No	_____
Scheme documents available	Yes / No	_____
CPD Logbooks available	Yes / No	_____
SAP procedures etc available	Yes / No	_____

