Stroma Certification Ltd

CPD Guide: Audit Failure (Failure to Submit Evidence)

This Guide explains audit failure and audit failure procedures. There is a question section at the end of the Guide for you to complete in order to pass this section of the CPD.

If you have any questions regarding audits and submitting evidence that is not covered in this Guide, please email certification@stroma.com with details of your enquiry. Alternatively, please call Stroma Certification on 0845 621 11 11.
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Failing to Submit Evidence Following an Audit Request: DEA Audit Requirements and How to Pass an Audit

This CPD has been created to address issues experienced with completing a successful EPC audit.

We will be addressing the topic of EPC Audits including:

- what an audit is
- when are they requested; and
- what is required from each scheme member upon receiving an audit request

What is an audit and what is their purpose?

An audit is a quality assurance assessment (QAA) check of an assessor’s EPC result, i.e. the EPC that they have produced. These are requested at certain times of the year and under certain conditions on a certain percentage of all EPCs lodged. There are two types of audit – Random and Targeted – which are discussed below.

An audit is often considered a way of the scheme to ‘catch out’ the assessor, but Stroma have always considered the audit process as a fantastic learning tool which can help each member understand where they are making mistakes and how to avoid making those mistakes in the future.

DCLG have asked that all Schemes shall require their members to provide sufficient material to their Scheme, such that the EPC can be recreated by an independent Quality Assurance Auditor without the need for access to the Energy Assessor’s RdSAP input data file.

Evidence provided by an Energy Assessor shall be such that an independent assessor can be reasonably certain the evidence relates to a particular EPC. Failure to supply evidence for an EPC survey could result in suspension until such evidence is provided. It is therefore very important that you always respond to an audit request within the timescales set.

For further guidance on Audits, please download the EA Monitoring Procedure at your convenience.

Frequency of requests

Random audits

Audits can be called for a number of reasons, as displayed in the table below for our Scheme Operating Requirements. As part of an on-going process of quality assurance, Stroma Certification is required to carry out desk-based audits for a minimum of 2% of all lodged EPCs.
Assessor Group | Minimum Audits Required | % of Member’s Lodged EPCs
--- | --- | ---
**New members** (< 6 months)  
Either new to the scheme, new to the qualification or rejoining the scheme after a break in membership.  
*Please note that members who are inactive for a period of 2 years will automatically revert to this status.* | • One audit in the first 30 days of membership; or  
• First available certificate lodged  
• Minimum of 1 audit per quarter | 5%

**Existing members** (> 6 months)  
Have been with the scheme for more than 6 months. | • Minimum of 1 audit per quarter | 1%

**Members returning from suspension** (for 6 months following return from suspension) | • 5 audits in a 6 month period | 10%

**Clarification of the calendar year, 6 month and quarterly periods**

For the purposes of the QAA Policy:

- The calendar year runs from 1st January to 31st December
- The half year period (2 periods in a calendar year) runs from 1st January to 30th June, and 1st July to 31st December
- Quarterly period (4 periods in a calendar year) runs from 1st January to 31st March; 1st April to 30th June; 1st July to 30th September; and 1st October to 31st December.

**Targeted audits**

If in the event the scheme member, having gone through the monitoring process, is found to have produced an EPC that is outside the acceptance bands as detailed in Section 4.0, Stroma Certification will provide feedback to the scheme member, and the following steps will be taken?

1. The audited EPC will be cancelled from the Landmark register by Stroma Certification and an amended certificate must be created by the assessor, which must be provided to Stroma Certification for checking. It must then be re-issued to the client and lodged on the register by the energy assessor within 10 days of the audit fail notification.
2. Stroma Certification will carry out additional audits of 2 further EPCs lodged by the scheme member in the subsequent 30 days following the initial call for audit, or if not possible, the next 2 EPCs lodged.

Minimum requirements at audit

The minimum requirements for audit are defined in the table below. The requirements can change, and sometimes do, but we would let you know if they did with plenty of notice. The table of minimum requirements is from Appendix 5, Table 1: Minimum Evidence Requirements on Page 46 of the latest Scheme Operating Requirements.

A floor plan should be included. The minimum requirements for the floor plan are it should cover all levels, and should contain annotations with measurement, areas and HLP shown.

Site notes – Paper or electronic file. Within these site notes, you must record anything you use to support a decision you have made, a reflective thought, or amending recommendations. Anything which can’t be proven through evidence must be noted here.

Minimum Photographic Requirements:

- Front Elevation
- Rear Elevation
- Side Elevation (if property is detached/semi-detached)
- Cavity Wall Insulation – evidence
- Roof construction
- Openings – windows/chimneys (if these aren’t clear on previous photographs)
- Primary Heating System (also showing key features)
- Secondary Heating System
- Loft insulation – showing depth of insulation
- Evidence of wall thickness
- Conservatory – photographic evidence of separation

Where relevant:

- Heating System controls
- Hot water cylinder and stat
- Electricity and gas meters
- LPG Cylinder
- Fixed low energy light fittings
- Any other feature of the building or limitation whose presence or absence may be reasonably considered likely to affect the SAP rating
- Any other feature which supports a claim in the report that could be queried or be the subject of a complaint

Where you cannot practically achieve photographic evidence of a specific element, but it is present, this should be recorded to your site notes along with an explanation as to why it was not achievable. Schemes reserve the right to investigate misuse of this, should this occur.

All photographic evidence should be dated within the image, to prove that they relate to the property being assessed, on the date of assessment. If this is not possible, electronic files (eg .jpg) are acceptable as long as we can securely ascertain the dates from the file.
Photographs embedded in files (e.g. MS Word, .PDF etc.) should be dated within the image, with the master images being retained by you, so that if we, or the CLG, want to inspect these, we can.

If any other evidence is available to justify the inclusion or suppression of recommendations, such as guarantees or building control notices, then evidence of this should also be supplied.

**Documentary Evidence**

Documentary evidence is defined in convention 9.02:

| 9.02 | Documentary evidence | Acceptable documentary evidence includes certificates, warranties, guarantees, building regulation submissions and official letters from applicable Registered Social Landlord (RSL). The assessor must be confident and able to demonstrate that any documentation relates to the actual property being assessed and that there is no physical evidence to the contrary. | March 2010 |

Documentary evidence is required to overwrite any U-values, and to enter loft/wall/floor insulation if these cannot be visually inspected. If documentary evidence does not meet the above requirements, then it cannot be accepted.

**Responding to a request**

You will receive all requests by email, no matter what system you lodge on. If you lodge with Etech, we will automatically retrieve your uploaded evidence from their servers. If you wish to submit extra information pertaining to the survey, you should reply to the request email with the extra evidence.

Similarly, if you lodge on any other system, we will check on OSA 15 to see if you have uploaded the information for audit onto that system.

For both of the above, we allow a cooling off period to ensure that you the assessor get a chance to submit any extra information you haven’t uploaded, or have missed off your upload to OSA 15. After this cooling off period, we will attempt to retrieve the information from OSA 15. If there is anything missing from the submission from OSA 15 or Etech, we will let you know as soon as we realise.

We will always check OSA 15 or Etech for uploaded documents before we make our calls and emails to you to request the submission of the audit.

If you don’t use either of the above, then you should either reply to the email attaching all the documents, or you can post the audit to us. One point to bear in mind for posting audits, is that your photographs must be date stamped to prove that they relate to the property being assessed, on the date of assessment.

The audit should be submitted within fifteen working days; otherwise a suspension could be imposed onto your account.
Feedback and next steps

Fifteen working days after you submit audit information, the auditing work will be completed. Usually, on the same day of auditing work the feedback will be issued to yourself (requirements state this can be up to five working days).

If you pass, you will receive an email telling you so, and feedback will be present should you have made any minor errors.

If you fail, you will receive an email telling you so, with structured feedback explaining why the failure has occurred, and detailing also any minor feedback as well. When you receive an email notifying you that you have failed, you should re-lodge the certificate within ten working days of the feedback email being issued.

Of course, if you wish to appeal, you also have ten working days to submit this. In an appeal, you can present further evidence or extenuating circumstances. If the appeal is successful, then you would not need to re-lodge the certificate. If the appeal fails, you would need to re-lodge the certificate.

Things to bear in mind – Hints and Tips

The overriding guidance for passing any audit is that too much evidence is never a bad thing. You can never have too many photos or notes made on site. If you are making a judgement call on an aspect of an assessment, then extra photos and notes can allow an auditor to understand your thought process. Photos and notes showing justification for unknown elements and areas that you weren’t able to inspect would also allow an auditor to understand why an unknown statement has been made.
Audit Failure Question Sheet

Now that you have read and digested the CPD provided due to the failed audit, you are now required to complete this sheet. Below are a set of questions relating to audit evidence and EPCs. There are 21 multiple-choice questions in total. There is one correct answer per question; on questions where two answers are required, this will be stated within the particular question. You must hit full marks to pass this section of the CPD.

1. If you are a new member to the scheme or if you have taken a break in membership, how long will you be on the 5% audit regime for?
   
   a) 3 months  
   b) 6 months  
   c) 9 months  
   d) 12 months

2. If you are an existing member, and you lodge 100 EPCs a year, how many audits should you expect? (Assuming you pass all your audits)
   
   a) 3  
   b) 4  
   c) 5  
   d) 6

3. You receive a quarterly audit on the 31st of March and then another on the 1st April, why is this?
   
   a) No idea. Ring Stroma as it must be a mistake  
   b) Because March is part of the first quarter, and April is part of the second quarter; this is correct.  
   c) Because Stroma love sending as many audits as possible out  
   d) Because you lodged lots of EPCs in March

4. What is a 1% audit? (choose the two correct answers)
   
   a) An extra audit per year  
   b) It is a requirement of the SOR for Stroma to check at least 1% of all EPCs lodged by a DEA; this may not be covered by the minimum quarterly checks and so percentage audits are called.  
   c) An extra audit per quarter for higher lodgers  
   d) Stroma like sending more audits out to check assessors
e) 1% audits are called for DEAs who are not on heightened QA or within the first 6 months of their membership start date.

5. What are targeted audits?

   a) Extra audits for higher lodgers
   b) Extra audits for new members
   c) Customer complaint audits
   d) Audits on the back of a failed random audit

6. Should a floor plan and site notes be submitted for audit?

   a) No – only if they help an auditor
   b) Yes – if required. The site notes help justify a decision made. Floor plans are a mandatory requirement.
   c) Just a floor plan
   d) Just site notes

7. What should be shown on a floor plan?

   a) Calculations only
   b) Levels only (different storeys)
   c) Annotations – locations of boiler, radiators etc.
   d) All of the above

8. Is it acceptable to not provide one of the minimum requirements for audit?

   a) Yes
   b) No

9. If the heating system you are assessing has controls comprising of a programmer and room thermostat, what evidence of heating controls should you be sending in?

   a) None as heating controls aren’t in the minimum requirements
   b) Programmer only as this is the main heating control
   c) Both controls

10. If you use a U-value calculation, or a certificate declaring the presence of cavity wall insulation at the property, what should you do with these?

    a) Provide evidence for the audit – so the auditor can replicate your inputs into the software
    b) Ask the homeowner for a copy of the documents when audited
    c) Provide evidence when you fail the audit for what the certificate proves
d) None of the above

11. From the initial request, how many working days do you have to submit the audit?
   a) 5 working days
   b) 10 working days
   c) 15 working days
   d) 20 working days

12. If you don’t submit the audit in fifteen working days, what will happen?
   a) Revocation of your membership
   b) Suspension of your account pending receipt of information
   c) Nothing – we will wait until you submit it
   d) We will request two other audits instead

13. How long does Stroma have to complete the audit?
   a) 5 working days
   b) 10 working days
   c) 15 working days
   d) 20 working days

14. If you fail the audit, how long do you have to replace the defective certificate?
   a) 5 working days
   b) 10 working days
   c) 15 working days
   d) 20 working days

15. If you disagree with the audit, what should you do?
   a) Appeal by emailing the assessor back with the reasons why
   b) Ignore the feedback email as you don’t agree with the feedback
   c) Appeal but only after the 10 working days after receiving the audit feedback has lapsed.

16. When should you make your appeal by?
   a) 5 working days
   b) 10 working days
   c) 15 working days
d) 20 working days

17. Sometimes we don’t have the correct email address on file for sending audit feedback out to. Whose responsibility is it to ensure this information is correct at all times?
   a) Stroma
   b) DCLG
   c) DECC
   d) You, the DEA

18. If you don’t provide a minimum evidence requirement, such as the primary heating evidence, what will happen?
   a) Pass with a warning for next time
   b) Failed and the primary heating would require changing
   c) Failed for insufficient evidence – the audit cannot be accurately carried out
   d) Suspension of the account

19. If you note a certain aspect of the property but cannot gain evidence, i.e. the loft insulation scenario where it is too dangerous to get a picture while measuring the depth, what should you do in this case?
   a) Make a mental note
   b) Note this accordingly on the site notes and enter the loft insulation
   c) Discount the loft insulation
   d) Enter unknown

20. If you submit evidence for an audit without any form of date stamp, what outcome should you expect?
   a) Pass with a warning for next time
   b) Failed and relodged EPC required
   c) Failed for insufficient evidence – the audit cannot be accurately carried out
   d) Suspension of the account

21. How can you ensure that Stroma has up-to-date contact information on your account?
   a) Login to your members area (www.stromamembers.net) and click on ‘Your account’ to check the details and fill out a change of detail form if necessary.
   b) Call the certification membership team and check your details
c) Contact Stroma in writing with changes or confirmation of your contact details
   (certification@stroma.com)

d) All of the above are applicable – however changes must be in writing or via a change of detail form.