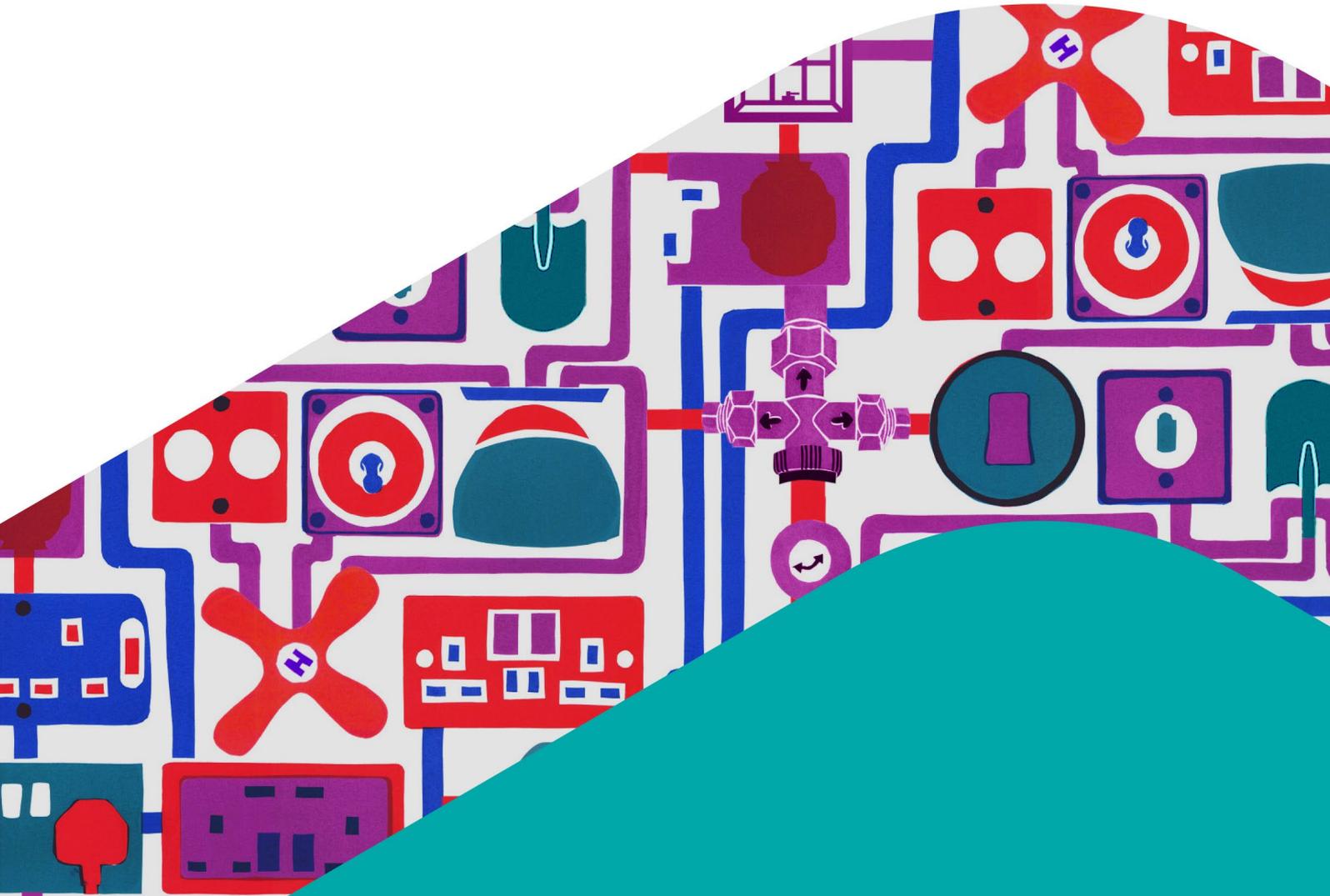




TRUSTMARK
Government Endorsed Quality



EC03/EC03t Quality Assurance Guidance

V1.2 March 2022

trustmark.org.uk

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This document provides guidance for the TrustMark quality assurance delivery, working in conjunction with Bierce Surveying Limited, for ECO3/ECO3t and under our responsibilities applicable from 1st July 2021.

This document is dated, and version controlled, subsequent reissue must be considered the valid version.

1 Background

- a. From 1st July 2021 the responsibility to administer the process for ECO3 ‘technical monitoring’ transfers from Ofgem to TrustMark. For ECO3/ECO3t installations with a handover date after 1st July 2021 the requirements set out in this document supersede previous guidance published by Ofgem.

Going forward TrustMark will use the term quality assurance rather than technical monitoring, due to the increased role in compliance delivery around PAS 2035.

2 Our approach to quality assurance

- b. TrustMark will undertake as part of our quality assurance delivery both desktop and on-site audit functions.

2.1 Desktop audits

TrustMark will undertake a percentage audit of data warehouse PAS 2035 lodgements made by TrustMark registered retrofit coordinators under the ECO3/ECO3t Scheme.

The audit purpose is to evaluate the lodgement evidence submitted by the retrofit coordinator to measure compliance against the requirements of PAS 2035.

TrustMark may communicate directly with retrofit coordinators to provide feedback and will request corrective actions where applicable.

Desktop audit outcomes will inform any further audit activity.

Where audit activity identifies satisfactory levels of first-time compliance the audit activity will be adjusted accordingly in recognition of those factors.

2.2 On site audits and score monitoring data collection

In conjunction with desktop audits, we will undertake on-site audits on a percentage audit of installs carried by TrustMark registeredbusiness under ECO3/ECO3t.

The audit purpose is to evaluate the compliance of the installation set out in the TrustMark Framework Operating Requirements.

Bierce Surveying Limited will operate a tandem on-site process to collect data for the purpose of score monitoring. The data will be passed to Ofgem for reconciliation with the scoring data provided to them by obligated Energy Suppliers.

It has been agreed that any score monitoring non-compliance that relates to an installed measure that needs physical remediation, will be subject to the TrustMark quality assurance requirements.

TrustMark and Bierce Surveying Limited do not have responsibility for the arbitration of the score monitoring data. This responsibility remains with Ofgem.

It is our expectation that all TrustMark registered businesses, including retrofit coordinators, shall comply with all requirements set out TrustMark through by Bierce Surveying Limited.

As part of the requirements of Bierce Surveying Limited, TrustMark has set out clear service delivery expectations.

The onsite quality assurance audits will be undertaken by a member of The Association of Technical Monitoring Agents (ATMA), which is a TrustMark scheme and contracted by Bierce Surveying Limited.

TrustMark's on-site audit activity process will recognise compliance trends of registered businesses. Where a registered business and its work is identified as non-compliant against the TrustMark quality assurance process, the onsite audit activity level will be adjusted accordingly.

The quality assurance process operated by Bierce Surveying Limited is laid out in [Annex One](#).

2.3 The role of TrustMark scheme providers

TrustMark operates through a network of scheme providers who in turn register installer businesses, retrofit coordinators and retrofit assessors. TrustMark oversees the delivery of scheme providers performance against the TrustMark Framework Operating Requirements.

To maximise compliance across ECO and the wider retrofit sector, TrustMark will engage with our scheme providers to share data warehouse lodgement data and the outcomes of our quality assurance programme so that the scheme providers can respond accordingly.

2.4 Responding to the outcomes of quality assurance activities

TrustMark will provide quality assurance activity outcomes to the respective scheme providers. This will enable the schemes to be provided with information in relation to the performance of their TrustMark registered businesses. This may be used to supplement or enhance the activities that the scheme provider may perform, including surveillance monitoring required of UKAS Accredited Certification Bodies under PAS 2031.

Where a registered business, including a retrofit coordinator, has exhausted the TrustMark quality assurance processes and an identified lodgement or work remains non-complaint, TrustMark will engage with the relevant scheme provider to help support the decision about the appropriate action required.

3 Final outcomes

Where an audited measure or other business activity remains non-compliant after all relevant quality assurance processes have been applied, further action will take place under the TrustMark quality assurance process, these outcomes will fall under the following broad categories:

3.1 Final outcomes for individual measures

Where an individual measure remains outstanding without a remediation that has been verified by re-inspection the following actions may apply:

- Voiding of the individual lodgement within the data warehouse.
- Increased frequency /depth of audit
- The application of bespoke conditions to the registration

Where a lodgement becomes voided TrustMark will report the outcome to Ofgem, who will act accordingly.

3.2 Final outcomes for Registered Businesses

In the event a business' performance is observed to be of concern TrustMark will work with the associated business' Scheme Provider(s) to determine an appropriate plan of action to improve performance. These plans must be applicable to:

- All discovered instances of non-compliance
- All potential instances of non-compliance for installations conducted by that business
- All future installations conducted by that business

Should the aforementioned plan's implementation not satisfy TrustMark's concerns or result in an observable improvement in installer performance TrustMark may complete the following:

- The application of bespoke conditions to the registration
- Suspension of registration
- Termination of registration

Final outcomes for TrustMark Scheme Providers

TrustMark will work with our scheme providers to attempt to achieve the highest possible standards across the retrofit industry.

A key component of this will be the sharing of Quality Assurance information to both address topics discovered within QA and to inform a Scheme Providers on surveillance regime.

4 How to contact TrustMark

Any enquiries related to the text of this publication should be sent to TrustMark at the following address:

The Square
Basing View
Basingstoke
RG21 4EB

This publication is available at www.trustmark.org.uk

Annex One

Quality Assurance Monitoring Delivery Guidance

1. Introduction
2. Quality assurance monitoring description
3. Quality assurance – post installation inspections
4. Quality assurance – requirements & processes

1. Introduction

In 2020 TrustMark, in conjunction with Bierce Surveying Limited, undertook an ECO Technical Monitoring Pilot [utilising data collated in the TrustMark data warehouse](#).

Bierce Surveying Limited will operate onsite quality assurance monitoring, as contracted by TrustMark.

2. Quality assurance monitoring description

Quality assurance monitoring is a process to support and help ensure measures installed under schemes meet the relevant standards of installation.

This guidance intends to explain the processes, and our expectations for the measures installed within ECO during the period 1st July 2021 to 30th June 2022.

Audits on the pre-install building inspection reports (PIBI) will be undertaken by BSL. TrustMark may request additional mid-installation on-site inspections from the outcomes of these audits.

Post quality assurance inspections will only be conducted on measures installed that have been lodged in the TrustMark data warehouse.

The monitoring requirement will be that set by TrustMark.

3. Quality assurance – postinstallation inspections

Monitoring questions

For measures installed during the period 1st July 2021 to 30th June 2022, Bierce Surveying Limited will utilise the existing approved Ofgem technical monitoring question set (Current version V1.4) plus any specific related Ofgem agreed innovation questions.

Health & Safety questions will remain included however, these will be consolidated to the following two questions:

All measures	Post	H&S.1	Do any faults specific to the measure installed present an immediate risk to the occupier or the property?
All measures	Post	H&S.2	Do you believe that there are any other safety related issues with the installation?

Installing measures in accordance with the Publicly Available Specification 2030 and 2035

Start Date	End Date (for ECO)	PAS Version
01 February 2017	30 June 2021	PAS 2030:2017
01 July 2021	-	PAS 2030:2019 PAS 2035: 2019

Where applicable, measures must be installed in accordance with the relevant versions of PAS 2030 (Specification for the installation of energy efficiency measures in existing dwellings and insulation in residential park homes), and PAS 2035 (Retrofitting dwellings for improved energy efficiency – Specification and guidance)

The primary objective for PAS 2030 is the provision of a robust, uniformly, applicable energy efficiency measure installation process that will assist installers that comply with its requirements in full to demonstrate that their installation processes are capable of providing installation to specification.

Ventilation requirements

Requirements for correct and adequate ventilation are clearly defined in PAS 2030, and further supported by PAS 2035.

Both specifications provide reference to standards publications, together with reference to relevant Building Regulations.

- Annex C - PAS 2035 sets out the requirement for provision of adequate ventilation.

- PAS 2030 - Clauses 1 to 9, together with those set out in the Annex relevant to each measure to be installed provide further detail.

Customer refusal

Installers should be aware that if a consumer refuses to have part of a measure installed this may result in a quality assurance inspection outcome raising issues of non-compliance.

Consumer refusal could result in the measure not being installed to PAS 2030 or PAS 2035 requirements. An example of this being that the property may be at greater risk of future problems such as condensation and damp.

Installers should at all times refer to the requirements set out in PAS 2030 and PAS 2035, working with their EEM system designer and retrofit coordinator, to mitigate the likelihood of a non-conforming install.

Score monitoring

Bierce Surveying Limited will operate a tandem on-site process to collect data for the purpose of score monitoring. The data will be passed back to TrustMark, who in turn, will share with Ofgem to reconcile with Energy Suppliers.

Innovation measures

Innovation measures will be quality assured utilising the existing approved Ofgem technical monitoring question set (current version V1.4), plus any specific related Ofgem agreed innovation questions.

4. Quality assurance – requirements & processes

Independence

The onsite quality assurance audits will be undertaken by suitably qualified and competent agents, registered with The Association of Technical Monitoring Agents (ATMA), which is a TrustMark scheme and contracted by Bierce Surveying Limited, and be independent from:

- a) the retrofit coordinator
- b) the installer
- c) any party that has control or ownership of the premises
- d) any party linked to ECO funding

Reporting non-compliant installs

Where a quality assurance monitoring inspection identifies any non-compliance, Bierce Surveying Limited will notify the following parties;

- the installer
- the Retrofit-Coordinator
- TrustMark

TrustMark will provide quality assurance outcomes to the respective scheme providers and Ofgem.

Responding to non-compliant installs

Where a quality assurance monitoring inspection identifies any non-compliance, the measure will be considered not installed in accordance with the relevant standards of installation for that measure, or there is insufficient evidence to support it.

When a measure has been notified as non-compliant, installers must take action to address the cause and arrange for remedial works. Once completed, installers must notify Bierce Surveying Limited at remediation@bierce.co.uk.

Installers must remedy the non-compliance within the timescales set out in the remediation section below.

Bierce Surveying Limited require installers to make all reasonable efforts to contact the occupant to conduct the remedial work.

Remediation

- CAT 1 - High Risk installation non-compliances that pose or potentially pose a risk to life and/or property and thereby requiring remediation immediately and within 24 hours of the identification of a non-conformity.
- Non-Compliant – Installation that requires remediation within seven calendar days of the notification of a non-conformity.

Re-inspection

- CAT 1 – Bierce Surveying Limited will arrange a re-inspection following notification by the installer of the completed remedial works.
- Non-compliant - Bierce Surveying Limited will arrange a re-inspection following notification by the installer of the completed remedial works.

Remote re-inspection

It is envisaged that where practical and suitable, Bierce Surveying Limited will adopt a remote re-inspection process.

[Guidance for remote inspections can be found in the Ofgem publication ECO Amidst COVID-19.](#)

Photographic evidence must be date, time stamped and geo-tagged.

We appreciate that remote inspections cannot be utilised for all cases, therefore, site re-inspections will remain an active option.

Appeal process

Where a quality assurance monitoring inspection identifies any non-compliance, the measure will be considered as not installed in accordance with the relevant standards of installation for that measure, or there is insufficient evidence to support it.

The installer may challenge the outcome of the quality assurance inspection should they have evidence to do so.

CAT 1 – It is unlikely that installers will look to challenge an immediate health and safety risk. However, any challenge must be made within 24 hours of the establishment of a non-compliance. Where an installer instigates a challenge, no liabilities are transferred to Bierce Surveying Limited (or TrustMark).

Non-compliant - Appeal must be made within seven calendar days of the establishment of a non-conformity.

Appeals must be submitted to Bierce Surveying Limited supported by a fully completed 'notification of quality assurance non-compliance appeal form' to be considered for review, which is on www.bierce.co.uk.

All evidence must be provided to support the appeal and must be sent to appeals@bierce.co.uk.

Once received, the submission will be considered 'live'.

No further evidence will be considered once the submission becomes live.

No appeal will be considered outside the timeframes given above.

Photographic evidence must be date, time stamped and geo-tagged.

If Bierce Surveying Limited accepts that a measure should not have been deemed non-compliant, this will be deemed as an 'overturn'. TrustMark and the installer will be notified via email.

If the evidence supplied for the appeal is insufficient, the non-compliance will be upheld and the remediation process must be followed, adhering to the above timescales.

TrustMark and the installer are notified via email.

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We hope you find this information useful and it helps you recognise the benefits TrustMark provides for itsRegistered Businesses.