

Energy Action Scotland's response to the consultation on the National Occupational Standards for Green Deal Energy Advisor

ASTGDA1 Provide information to customers on the principles and operation of the Green Deal

P3 - Given that many of the Green Deal advisors will be working for specific Green Deal providers, how can the performance criteria under this be adequately fulfilled?

K5 - How can advisors demonstrate knowledge under this area if they themselves will not be impartial in the advice given due to the nature of their employer?

Other comments: The main issue for this section is how the NOS reflects the "impartiality" of the advice given to customers where Green Deal Advisors themselves may well be directly employed by a specific Green Deal Supplier who will have their own portfolio of measures to promote.

SFJCCDA4.1 Deal with customers face to face

No specific comments.

SFJCCDC1.1 Deal with customers using bespoke software

No specific comments.

SFJCCDA1.2 Use questioning techniques when delivering customer service

No specific comments.

SFJCCDA1.1 Deal with incoming telephone calls with customers

No specific comments.

ASTDEA4 Undertake energy inspections

Scope/range

2. Critical property features: wall construction, inadequate heating.

4. Contraindications: non-traditional construction (system built).

5.3 clear photographs (need to be labelled or annotated clearly) photographs in themselves do not specifically indicate the subject.

ASTDEA5 Produce and explain energy performance certificates

Scope/range

1. Critical property features: wall construction, inadequate heating.

2. Component Parts: Where a measure has been specifically excluded by the assessor.

ASTNDEAs5 Undertake energy inspections of existing level 3 non-dwellings using the simplified building energy model

Energy Action Scotland's concern does not extend to non-domestic buildings.

ASTNDEAs6 Undertake energy inspections of existing level 4 non-dwellings using the simplified building energy model

Energy Action Scotland's concern does not extend to non-domestic buildings.

ASTNDEAs7 Undertake energy inspections of existing level 5 non-dwellings using the dynamic simulation model

Energy Action Scotland's concern does not extend to non-domestic buildings.

ASTDEA2 Prepare for energy assessments of domestic property

No specific comments.

ASTNDEAs2 Prepare for energy assessments of non - dwellings

Energy Action Scotland's concern does not extend to non-domestic buildings.



Suite 4a
Ingram House
227 Ingram Street
Glasgow G1 1DA
Tel: 0141 226 3064
Fax: 0141 221 2788
Email: eas@eas.org.uk
www.eas.org.uk

ASTACEA1 Conduct energy assessment in a safe, effective and professional manner

No specific comments.

ASTGDA 5 Carry out home visits to undertake occupancy assessments and advise on reducing energy use

3 Relevant information: 3.1 to 3.3 not relevant for anything other than a household visit.

Other comments: Why are methods 1.2 Telephone interview and 1.3 Client completion questionnaires included under this unit which is specifically designed for "home visits"?

ASTGDA6 Carry out energy inspections on non-dwellings to produce occupancy assessment

Energy Action Scotland's concern does not extend to non-domestic buildings.

ASTGDA 2 Prepare and issue green deal advice reports

No specific comments.

ASTGDA 7 Prepare and issue non-domestic green deal advice reports

Energy Action Scotland's concern does not extend to non-domestic buildings.

ASTGDA 3 Explain the green deal report to the customer

1. Measures: Whilst some technologies in themselves are applicable for both domestic and non-domestic e.g. roof insulation, the potential scale and complexity of certain measure for non-domestic application may well require a different set of understanding and knowledge e.g. the practical application of zoned thermostatically controlled heating in a large building will be driven by room thermostats which are both suitable for domestic and non-domestic, however very different in application.

Other comments: One of the main issues for this section is how to ensure the "impartiality" of the advice given to customers where Green Deal Advisors themselves may well be directly employed by a specific Green Deal Supplier who will have their own portfolio of measures to promote. The other issue is how predictions of fuel costs are handled by advisors using the information provided on the assessment. There is no definitive consideration of how payment method can significantly influence costs.

ASTGDA 4 Provide information to customers on green deal financial arrangements

Completeness: It is not clear from the performance criteria that GDA will be required to explain that due to the "golden rule" the householder should expect to see no cost saving on their fuel bill in the initial period of the Green Deal finance. There should also be a requirement that the GDA explain that whilst no saving will be made initially, the impact of future price rises on their fuel bills will be mitigated by the presence of their energy efficiency measures that have been installed under the GD.

Q24. Element 5.2 of ASTGDA6 describes the assessment of a commercial building (that is a non-dwelling) for the purpose of giving advice on energy management to the organisation occupying the building. Does this adequately describe a Green Deal assessment?

Energy Action Scotland's concern does not extend to non-domestic buildings.

Q25. Following on from Question '24' - Is anything not needed, or is anything missing?

Energy Action Scotland's concern does not extend to non-domestic buildings.

Q26. ASTGDA7 describes the tasks required to prepare and issue non-domestic Green Deal Energy Advice Reports.

Is it reasonable to expect Green Deal assessors to be able to research current cost information for improvement measures, and be able to calculate the likely cost of any measures that they proposed?

Energy Action Scotland's concern does not extend to non-domestic buildings.

Q27. ASTGDA3 is currently a common unit between non-domestic and domestic energy advice and covers the task of explaining the Green Deal report to the customer.

Is there a need for separate units covering the two types of advice?

There should be separate building services units for non-domestic buildings. The application of certain services will be significantly different or even not applicable for a domestic size building. Also some buildings designed for residency will be large enough that they will employ services designed for non-domestic buildings.

Q28. Do the NOS provide a clear description of the impartial nature of Green Deal advice?

The NOS does cover issues around impartiality, however it is not known at this point whether the Green Deal policy will impose and legislate for the need for a completely impartial/independent Green Deal Assessor component of the whole process. Many potential Green Deal suppliers are already talking about providing a full in-house service which would preclude and make redundant any GDA qualification requirements to demonstrate that the assessor was impartial. The models for the relationships between GDA and Green Deal providers would appear to work best if GDA are linked to specific Green Deal providers, as it is not clear how GDA could be financed if payment for their services would be dependent upon a successful Green Deal finance application.

Q29. Do the NOS provide a clear link between advice and the roles of installers and financial providers?
Yes.

Q30. Do the NOS make clear the distinction between impartial advice and other advice tied to particular providers, suppliers and services?

It is not clear how if "impartial advice" was a viable service within the Green Deal finance process that this would be enforced and monitored. P3 of ASTGDA1 describe the need to "Explain how the Green Deal will ensure the provision of impartial advice and recommendations" however for consumer confidence, GDA should be making clear their role in relation to an accreditation scheme which will have its own complaints procedure. Consumers should have disclosed to them the purpose and function of such accreditation bodies and the process by which they can appeal on decisions made under the "golden rule" and also the conduct of assessors e.g. against assessors who make assumptions on the level of loft insulation without ever investigating the loft area on site.

Q31. Green Deal Assessors are responsible for facilitating a financial package by the information that they generate. As such they should be in part liable for the same mis-selling protection. Green Deal finance companies are exposed to the risk of the GDA competency and so without a close link between assessor and finance, there is no incentive for the GDA to ensure that what they provide by way of assessment is correct to the best of their knowledge. We are aware that the use of "unknown" as a data entry item under RDSAP is being positively discouraged; however it is just as easy to guess something rather than positively confirm an "unknown" when there is no clear liability for mis-representation of the property to the Green Deal finance company.

Q32. Should this unit, ASTGDA 4 on financial knowledge, also include an understanding of other methods available to finance improvement measures, such as ECO?

Along with ECO, the GDA should also make the householder aware of any other means of financing energy efficiency improvements that would be available to the householder based on where they live and their financial circumstances.

Q35. Is there adequate coverage of vulnerable customer requirements?

Again the skills alluded to in this area would appear to be covered in generic modules such as SFJCCDA1.1 The term "vulnerable" means many different thing in different policy areas. In relation to Green Deal "vulnerable" could mean eligible for ECO or does it relate to the more general understanding of "vulnerable" i.e. that some disablement or cultural difference puts the customer at a disadvantage in relation to the general able bodied native English speaking public?

Q36. Is there adequate coverage of the particular requirements of rural customers?

This is a process issue, i.e. it is not clear how within the scope of a personal qualification that the knowledge and understanding of delivering energy efficiency measures to properties within a rural location will help if the property due to its postcode is somehow excluded from certain offerings by Green Deal providers before an assessment is even carried out. If anything, GDA will have to be able to explain to householders why it is that they may not be able to get equal access to a full range of measures. This will be a market led area, and certain Green Deal providers may well focus on delivering measures to rural areas and part of their business model.

Q37. Should the NOS cover background to the Green Deal so that advisors are able to explain this policy background to clients?

Yes.