

Consultation on Scottish skills requirements for energy efficiency, zero emissions and low carbon heating systems, microgeneration and heat networks for homes

30/April/2021

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment. BEFS is a member of the [Climate Heritage Network](#) steering group.

BEFS sat on the Short Life Working Group on Assessment in relation to Energy Performance Certificates.

In response:

BEFS strongly supports the primary focus around retrofit. Our most sustainable, and climate positive buildings are the ones already in existence.

BEFS is aware that the document heavily relies upon (PAS) 2035/30 including: assessment of dwellings for retrofit, identification and evaluation of improvement options.

It has been brought to BEFS attention that: PAS 2035 is a process rather than a specification. It does not define specific energy efficiency measures that should be introduced. This is a very important distinction, and care needs to be taken to ensure that the proposed skills matrix and qualifications are properly aligned with the process. The PAS 2035 process can be learned, but it relies on candidates already having sufficient knowledge and expertise in complimentary fields.

The Scottish Level 6 Award in Energy Efficiency Measures for Older and Traditional Buildings in relation to energy assessment might be introduced as complimentary to the other requirements of PAS 2035, but it should not be seen as an alternative to the other requirements, particularly in relation to traditional and historic buildings falling into risk grade B and C. (This has particular relevance to question 4 – see response below.)

The Scottish Level 6 Award in Energy Efficiency Measures for Older and Traditional Building should not be introduced as an alternative to conservation skills accredited by an expert body such as the RIAS or IHBC.

BEFS strongly supports SLQA group recommendation 5.

Recommendation 5. A new designer role should be considered to ensure that a whole building approach is taken and that only the most appropriate improvements are applied in practice.

Within the skills matrix BEFS notes the consistent use and mandatory nature of *SQA Level 3 Award in Energy Efficiency Measures for Older and Traditional Buildings* for all work carried out on Pre1919 buildings.

BEFS notes that: Greater clarity and consistency is required in relation to the SQA level 3 award. The SQA position as stated in their guidance with regard the qualification is different to that outlined on the skills matrix and incompatible with PAS 2035. The SQA website suggests that this qualification is suitable for surveyors and energy assessors – suggesting that the SQA are promoting this as a designer role. It should be made clearer that the SQA qualification is only suitable for installers only and does not comply with the requirements of PAS 2035 with regards the co-ordinator, designer or assessor role.

PAS 2035 recognises that pre 1919 buildings require particular expertise and recommends professionals with conservation accreditation in relation to the co-ordination and designer roles.

Consultation on Scottish skills requirements for energy efficiency, zero emissions and low carbon heating systems, microgeneration and heat networks for homes

30/April/2021

The SQA level 3 course is based on 27 hours of learning time, installers will require practical courses dealing successfully with on-site challenges, rather than a class based course. Without the practical element, the course will be of limited value and will fail to deliver the step change in skills required to meet the retrofit targets and will result in countless failures that will require remedial work.

BEFS finds it of note that neither the Skills Investment Plan for [Construction](#), nor for [Scotland's Historic Environment Sector](#) are mentioned within the document. These are integral to meeting the skills needs for all of our built environment and have already been invested in to explore where skills gaps, and shortages, already exist. Without integration of these shortages and skills gaps, and their considered assessment of future need – the outcome will be a disjointed and patchy skills pipeline that serves neither the jobs market, nor our built environment, whilst simultaneously failing to meet climate targets.

Page | 2

Q1a – Do you agree with our proposal to integrate the installer skills matrix into the Publicly Available Specification (PAS) 2030 and Microgeneration Certification Scheme (MCS) installer standards? Please see comments above in relation to integrating the matrix with related qualifications.

Q1b Do you agree with our recommendation that manufacturer training should be in addition to, not instead of, these skills requirements? It is essential for consumer confidence that training from manufacturers is additional, not instead of, initial requirements.

Q4 – What are your views on the competency requirements for the retrofit coordinator, advisor, assessor, designer and evaluator roles?

It appears from this document (p12) that the Co-ordinator can be the Assessor, Designer and Evaluator. If this were to be the case, is there the temptation that Risk Assessments could be downgraded /diminished to ensure the work can be carried out by those less qualified?

BEFS would want assurance that Whole Dwelling Assessment should include maintenance assessment of the current state of the dwelling. Without this any interventions will not produce the outcomes, whether they are occupant comfort and health, cost, or climate impact, as expected.

Is any assessment or advice planned in relation to use and/or occupant behaviour?

BEFS has serious concerns over Advice giving, as this appears to be the least well-regulated step in the chain. This could lead to a poor outcomes for clients as initial advice vs. co-ordination/action roles could be at odds. Advice role also appears to include no current understanding of *advice in relation to traditional buildings*. There is mention of that happening “as PAS2035 develops”. Given the scale of the pre-1919 estate in Scotland (19% of building stock), this needs to be included from the start, not bolted-on at a later date.

As Advice may well be the first step for many, the steps within this plan do not build confidence and clarity for home-owners and could fail to support high levels of consumer confidence.

Further: The wording for the proposal in relation to the retrofit designer role for properties of Risk Grade C is inconsistent with the previous categories and also the requirements PAS 2035, which requires a progressive increase in qualification through each grade of Risk.

The need for progressively higher levels of expertise is recognised in the wording of PAS 2035 which states

Consultation on Scottish skills requirements for energy efficiency, zero emissions and low carbon heating systems, microgeneration and heat networks for homes

30/April/2021

“For projects assessed as risk grade C, and to which the requirements of Path C apply, and the building to be improved (or any part of it) is traditionally constructed or protected, the Retrofit Designer **shall also** be accredited or certified in building conservation.”

There is a danger that the current wording will result in a reduction in standards, and will result in a significant increase in inappropriate retrofit measures and failures. The current wording suggest that conservation expertise is optional for high-risk buildings. This should therefore be changed to reflect the actual requirements of PAS 2035, and the wording as it currently appears

Page | 3

“Risk grade C – same as risk B but for traditionally constructed buildings **can also** include:...”

Should be changed to:

“For projects assessed as risk grade C, and to which the requirements of Path C apply, and the building to be improved (or any part of it) is traditionally constructed or protected, the Retrofit Designer **shall also** be accredited or certified in building conservation...”

Q6b – What impact do you think our skills requirements will have on the energy efficiency, microgeneration and heat networks sector in Scotland more generally? From a non-technical perspective, any regulations which organisations know they will need to meet, enables skills providers and organisations to plan for the future. Enabling them to put steps in place to attract, train, and deliver the skills required. Without these requirements providers and individuals cannot take steps along appropriate career pathways. A lack of requirement is a blockage in the skills pipeline.

Q8 – What suggestions do you have for how digital technology could be used effectively to meet our skills requirements?

At present the digital tools required to monitor and audit the retrofit work carried out on buildings do not exist. Fragmented data is held in some aspects of the work but this is not adequate for implementing the retrofit programme. This is particularly important in the case of pre 1919 properties.

Current data systems such as the Trustmark data warehouse holds only limited information on an archive basis. Other information is held privately by property owners or by organisations on behalf of property owners. There is a high risk that fragmented information held in separate independent data stores will be lost and the data will become outdated as changes are carried out to properties but information is not updated across all of the data sources.

This is particularly important in relation to PAS 2035 and the preparation of a staged approach to retrofit, with short term actions and medium to long term plans – these details need to be held in a manner that will ensure that data is not lost over time as property ownership changes.

It is important that the government invests in the digital tools necessary to bring all this information together in a co-ordinated way.

Q9 – Are there any areas of skills we have not covered in this consultation that you think we should consider? There are three areas where BEFS sees additional considerations to be necessary:

1. Data. Without data as to the current maintenance, ownership, and existing interventions on the buildings of Scotland, as well as their age and material construction it will be increasingly difficult to plan for skills and materials need across the nation; taking into account regional variations and

Consultation on Scottish skills requirements for energy efficiency, zero emissions and low carbon heating systems, microgeneration and heat networks for homes

30/April/2021

overlapping this with data in relation to warm homes and fuel poverty enabling most urgent need to be met; and climate targets to be efficiently tackled.

2. BEFS would draw attention to the comments we have [previously made in relation to EPCs](#) and their lack of ability as currently used to accurately assess many traditionally built dwellings. If we are not starting from an accurate base, the interventions invested in may fail to deliver on economic and ecological targets, as well as potentially being detrimental to occupant health and comfort.
3. For the range of skills necessary to be effectively actioned many materials will be necessary – without an appropriate materials assessment and sourcing plan, even with skills in place – the appropriate actions and interventions will not be able to take place. These materials may include many specific natural material elements, with regional specificities. A materials needs assessment is an essential part of the skills delivery process.
4. Roofing is mentioned within the skills matrix from an insulation perspective but the wide range of necessary skills to repair, maintain and intervene on rooves of all kinds is not fully expressed within this document.

Page | 4

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:

<https://www.befs.org.uk/resources/consultations/>

RESPONDENT INFORMATION

Name: Ailsa Macfarlane, Policy and Strategy Manager

Email: amacfarlane@befs.org.uk

Responding on behalf of an Organisation - **BEFS** (Built Environment Forum Scotland)

Address and Postcode: 61 Dublin Street, Edinburgh, EH3 6NL

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: **Publish response with name**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? **YES**

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. **I CONSENT**