

# GSHPA Members' Day & AGM

Chris Roberts, Director, MCSSCo

20<sup>th</sup> September 2018, NCC

### **Novation & Beyond**

- Novation complete April 2018; new Board in control
- Board Focus: making MCS the best it can be and viable for the future
- Achievements to date:
  - C&E Manager (Ben Howe) appointed
  - Fee increase process completed and launched
  - System for charging for duplicate/amended certificates introduced
  - Licence documents updated
  - New MID under construction following detailed tender process
  - New MCSSCO CEO (Ian Rippin) appointed
  - C & E work ongoing, focussing on cases unresolvable by CBs
  - First Stakeholder Advisory Group meeting in July
  - Communications consultant audit of MCS external comms, and is starting to progress recommendations new format Newsletter out later this month.
  - Review and refresh of scheme documents to be commissioned by CF
  - Consumer research project on brand recognition
  - CF funding for legacy projects underway: heat pump guidance, biomass, 2 PV projects
  - Joint MCSSCo & MCS CF FiT response submitted
  - Engaged with EHC and internal position adopted

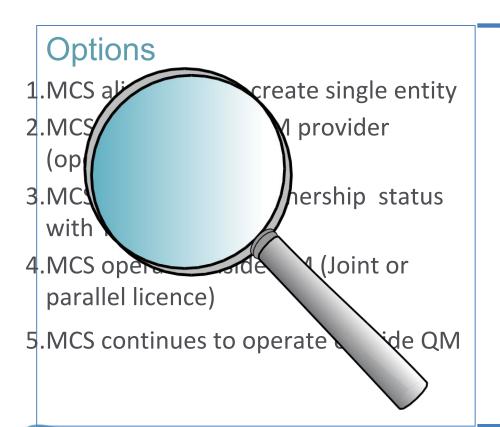


#### Each Home Counts / QM (TM v2)

- Numerous discussions with EHC & TM to explore working together
- Included Implementation Board and BEIS facilitated meetings
- Progress slow and desire for coordination / alignment seemed limited
- Only option proposed for single QM was single-entity via a full merger
- Commissioned independent consultant to define all options
- Extensive Board / Trustee meeting to decide position



### MCS / TM Options



#### Considerations

- Consumer benefit
- Consumer protection
- Risk to MCS as a scheme, and a business (MCSSCO)
- Acceptability under Charity law
- Practical barriers

Sustainable Energy Technologies

#### MCS / TM Conclusions

- Only 2 possible options:
  - 1. MCS operates inside QM (Joint or parallel licence)
  - 2. MCS continues to operate outside QM
- Given express wish of all that there should be a joined-up approach, we've formally written to BEIS to:
  - Clarify which of the above it will support
  - Publicly confirm to industry & stakeholders MCS is the quality mark for Microgeneration



#### Compliance & Enforcement

Ben Howe, MCSSCo Compliance & Enforcement Manager

### Some background

- One of the first MCS assessors at BRE
- Over 2 years working on the scheme from 2008
- 4+ years as Renewables Survey Manager at Mark Group
- 20+ years in sustainable energy commercial energy auditing (ESOS, DECs); M&T; M&V; energy contracts



#### MCSSCo – post novation

- Licence Agreement obligation on the MCSSCo to investigate complaints
- Historically, scheme administrator acted as 'one-stop shop', with complaints only handled by Cert Bodies and Consumer Codes
- Led to poor outcomes and higher costs to the scheme
- Implementation of new complaints process
- 'Whistle-blower' complaints fell through the cracks



## MCSSCo – post novation

- Consequentially:
  - Industry frustration at not exercising the powers available in the Licence Agreement
  - Complaint data lacked clarity, with little statistical vigour making management decisions impossible
  - Consumers given unrealistic expectations of what the MCS could achieve
  - Inconsistencies and costs of trying to coordinate all complaints meant poor value for money



## The New Complaints Process

- A fresh, simplified, effective approach
- Investigations by CBs ('post-sale/ installation') & CCs (pre-sales) initially
- 2 categories:
  - Consumer complaints
  - Whistle-blower complaints
- New infographic on MCS website
- Drawing on the broader compliance provisions in Licence Agreement for bringing the scheme into disrepute
- Compliance & Enforcement Manager role:
  - Potential for 'fees for intervention' and
  - The ultimate sanction withdrawal of MCS licence

# Reactive & Proactive Investigations

- In addition to addressing customer complaints escalated directly to Helpdesk...
- Proactive investigations based on risk factors, using data in consolidated complaints log – 'complaint ratio'
- Recent proactive case full investigation of a PV installer with high CR
  - QMS found to be lacking
  - Follow-up actions requested, to be fed back to installer's CB and
    CC
  - On-going monitoring of installer and complaints

#### Whistle-blower Cases

- As 1 person, I will be prioritising cases
- Feedback via Certification Body Forum
- Improvement of scheme standards
- Recent case 1:
  - PV installer photographed not using scaffolding or PPE while working at height
  - Installer investigated at their offices, with follow-up
  - Feedback to installer's Cert Body to be considered for subsequent MCS surveillance assessments



#### Whistle-blower Cases

#### • Case 2:

- Reports from major roofing contractor regarding a PV installer's practices old case, having fallen through the cracks
- Allegations of non-compliant installation of in-roof modules & frames, brackets, support battening, flashing
- Potential impact on wind-loading and water ingress
- 14 days for installer and Cert Body to respond with evidence
- Investigation due later this month





# Thank you

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