# CIS 8

## UKAS APPROACH TO ACCREDITATION OF GREEN DEAL CERTIFICATION BODIES

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### CHANGES SINCE LAST EDITION

This is a new document.
1. INTRODUCTION

1.1 Scope and Introduction

The Department of Energy and Climate Change (DECC) established the Green Deal programme in 2012 aimed at improving the energy efficiency of British properties. The Green Deal enables private firms to offer consumers energy efficiency improvements to their homes, community spaces and businesses at no upfront cost, and will recoup payments through a charge in instalments on the energy bill.

The Green Deal process is as follows:

A customer (an owner or occupier of a domestic or non-domestic property) has an assessment done by a Green Deal Advisor (GDA) who works for a Green Deal Advice Organisation (GDAO) with accredited certification from a Green Deal Advice certification body (GDA CB). The advisor inputs information on the property and its occupancy into software that produces a Green Deal Advice Report (GDAR) of recommended energy efficiency or micro-generation measures for installation. The customer takes the GDAR to a Green Deal provider (GDP) who arranges the finance and commissions the work from Green Deal Installers (GDIs) with accredited certification from a Green Deal Installation certification body (GDI CB). Thus UKAS is involved in accrediting certification of Green Deal advice and installation services using EN 45011/ISO 17065 as the accreditation standard.

DECC has appointed the Green Deal Oversight and Registration Body (GD ORB) to act on its behalf in administering the Green Deal.

Gemserv maintains the Green Deal registers of providers, certification bodies, installation bodies and assessor organisations on their webpages and Renewable Energy Assurance (REA) monitors compliance with the Green Deal Code of Practice.

All participants in the Green Deal programme also have to comply with the Green Deal Code of Practice. Compliance with this is not assessed by UKAS but by the GD ORB (REA).

2. SCOPING

2.1 Scope of Accreditation

The criteria used by UKAS for accreditation are ISO/IEC 17065 Conformity assessment – Requirements for bodies certifying products, processes and services superseding EN 45011 General requirements for bodies operating product certification systems.

The scope of accreditation will also refer to PAS 2030 Improving the energy efficiency of existing buildings - Specification for installation process, process management and service provision and PAS 2031 Certification of energy efficiency measure (EEM) installation services.

For definition of the scope of certification of Green Deal Installation Services, UKAS will use the wording in the list of measures published in PAS 2030. However, the measure code (B1, C2 etc.) will not be used on UKAS schedules to aid revision when the measures in PAS 2030 are revised.
From time to time PAS 2030 will be revised and measures added or removed. UKAS schedules will require amending for the latest edition of PAS 2030 and new measures, subject to application for extension to scope by the certification body.

Within these broad scope definitions there are sub scopes for which different competencies may be required. Certification Bodies will have to demonstrate competence for all of the sub scopes in order for to be accredited to a broad scope.

The scope of accreditation for certification of Green Deal Advice Services will be the DECC Specification for Organisations providing the Green Deal Advice Service and Specification for Certification Bodies certifying the Green Deal Advice Service and expressed as domestic and/or non-domestic (Levels 3, 4 or 5). These will be amended from time to time and hence the UKAS schedules will also need to be amended.

2.2 Scope of Certification

See also UKAS Green Deal and Competent Person Schemes Pilot Project Communication No 1. Certificates issued by Accredited Certification Bodies (25.02.12).

The product certification documents issued by certification bodies (CBs) are required to comply with clause 12.3 of EN 45011.

Green Deal Installations

The function of the CB is to evaluate the service provided by the installers to install Green Deal measures against the requirements of PAS 2030. The CB evaluates the installer's competence to provide this service, of which installed measures are an integral part, against PAS 2030 and by undertaking periodic surveillance of their work.

The accredited certificate issued by the CB to the organisation that installs the Green Deal measures may make the following statement.

This is to certify that the installation service provided by XYZ (name of the organisation) has been assessed as competent to install the following Green Deal measures in accordance with the requirements of PAS 2030: XXXX Edition X. (List measure(s))

XYZ (name of the organisation) is subject to periodic surveillance and is licensed to use the mark of the CB (name of the CB) and the Green Deal Quality Mark.

Green Deal Advice Services

The function of the CB is to evaluate the Green Deal Advice Services provided by the GDAO and certify the service provided by that organisation. The CB evaluates the organisation's conformity with the requirements of DECC Specification for the organisation providing Green Deal Advice Services.

The accredited certificate issued to the organisation providing the Green Deal Advice Services by the CB may make the following statement:

This is to certify the Green Deal Advice Services provided by the XYZ (name of the organisation) for *domestic and *non-domestic sector(s) are in accordance with the requirements of DECC Specification for organisations providing Green Deal Advice Services (latest version)

*delete as appropriate
XYZ (name of the organisation) is subject to periodic surveillance and is licensed to apply the mark of the CB (name of the CB) and the Green Deal Quality Mark.

3. ASSESSMENT CRITERIA

3.1 The following criteria are used as appropriate for assessment of Green Deal certification bodies certifying services of installers and/or advisors.

- ISO 17065 Conformity assessment — Requirements for bodies certifying products, processes and services superseding EN 45011 (ISO/IEC Guide 65).
- PAS 2030 Improving the energy efficiency of existing buildings – Specification for installation process, process management and service provision (Published by BSI - current version Edition 3 2014)
- PAS 2031 Certification of energy efficiency measure (EEM) installation services (Published by BSI - current version 2012)
- Specification for Organisations providing the Green Deal Advice Service (Published by DECC - current version 005-2014)
- Specification for Certification Bodies certifying the Green Deal Advice Service (Published by DECC - current version 205-2014)
- Green Deal Code of Practice (Published by DECC current version 4: 23.06.14) – compliance assessed by GDORB not UKAS
- Microgeneration Installation Standard: MCS 023: Additional Requirements for MCS Installation Companies to become Green Deal Authorised (Published by Gemserv: current version 1.0)

4. UKAS ASSESSMENT OF COMPETENCE OF CERTIFICATION BODY PERSONNEL

All of the scopes for which the CB has applied will be assessed by the UKAS assessment team at the initial assessment, with some of these scopes being witnessed. A clustering approach has been adopted to allow for a reasonable coverage of the measures included in a certification body’s accredited scope over the accreditation cycle. The clusters are based on the nine CPS Types of Work (see CIS 7 UKAS Approach to accreditation of CPS Operators) and the approach is detailed in Appendix 1.

The CB must demonstrate that they have competent personnel for evaluation, certification decision making and technical management for all the scopes for which they have applied. During the office assessment the UKAS assessment team will examine competence criteria, competence records, records of previous inspections/audits and other evidence to establish the certification body’s capability to certify all the scopes for which they have applied. The assessment team may also conduct interviews to establish technical knowledge of personnel.

UKAS will not assess the competence of each and every person (by witnessing) for each and every installation activity that the certification body is likely to inspect, as it would be impractical unless it is a very small CB with a very limited scope. The assessment of competence of the CB is based on sampling and by the use of different assessment techniques, of which witnessing is one. UKAS reserves the right
to increase or decrease the number of witnessed audits / inspections performed on site depending on the results of the assessment activities.

If the initial assessment of practical technical competence for installation of a particular measure is to be based on simulated work until such time as actual work is available for on-site assessment, such an approach would be acceptable provided this is clearly described in the certification body's procedures, the robustness of such a mock assessment is demonstrated to UKAS and there is a mechanism in place for the installer to notify the certification body when the first job is available. UKAS will assess any such alternative approaches by certification bodies on a case by case basis.

Some of the techniques that UKAS will use during assessments are as follows.

- Technical interviews
- Review of past reports
- Audit of CB's competence management process (e.g. adequacy of competence criteria (MTCs), training material/training records of evaluators/inspectors, CB's assessment of evaluators/inspectors, competence of those who evaluated them, the authorisation process, continuing professional development, CB's ongoing monitoring of evaluators/assessors)
- Review of records
- Verification of information
- Vertical / horizontal audits of processes

The extent of sampling and witnessing during surveillance activities is detailed in UKAS Forward Plans. Generally, all the GD clusters applicable are assessed during the accreditation cycle and at least one category is witnessed at each surveillance assessment.

5. ASSESSMENT REPORTING

The UKAS assessment report will clearly indicate how the assessment team has established the competence of the certification body to inspect and certify each of the scopes that UKAS assess. The assessment techniques used for assessing each scope, i.e. witnessing, interviews, review of past reports, examination and verification of competence records etc., as well the conclusions of the assessment team against each of the scopes assessed will be reported.

6. ASSESSMENT APPROACH – DETAILED POINTS

UKAS has from time to time issued Green Deal Communications to highlight points that have arisen during the pilot and roll-out phases of the development project.

To date there have been 5 communications:

1. Certificates issued by Accredited Certification Bodies – the contents of this communication are contained in this document in Section 3 Scope of certification.

2. Certification of existing customers by Accredited Certification Bodies – the contents of this communication are contained in this document in section 5.
6a. Certification of existing customers by Accredited Certification Bodies (information taken from UKAS GD Communication No. 2)

The following guidance is provided to clarify the process that should be followed by EN 45011/ISO 17065 accredited certification bodies (CBs) for existing customers who wish to have accredited certification for work that they will undertake for the Green Deal scheme against the requirements of PAS 2030 or the DECC Advisor specification or both. For the purpose of this communication, the term “existing customers” refers to those customers who have already been members of a previous scheme operated by a certification body.

It is fundamental to accredited certification that a certificate with the UKAS mark is only issued when the certification body has satisfied itself that the certified organisation has demonstrated that it meets the requirements of the scheme. Any form of “automatic” or “provisional” accredited certification is not in accordance with the principles of accreditation and thus not acceptable. CBs should therefore only grant accredited certification to organisations that have demonstrated compliance with all the requirements of PAS 2030, and/or the DECC Advisor Specification.

However UKAS recognises that members of most existing schemes will have undergone some form of assessment prior to membership or certification. Where compliance with requirements has already been assessed (within an acceptable periodicity for assessment) then there would be no need for this assessment to be repeated prior to grant of accredited certification. Where there are requirements that have not been assessed within such timeframes (such as the additional management reporting in the core text of PAS 2030), UKAS would expect certification bodies to carry out a gap analysis to determine the amount of assessment required. If there has been no previous recent assessment carried out, an assessment against all requirements would need to be done. Accredited certification can be granted only when this assessment has been successfully completed and any nonconformities have been addressed by the organisation. If the gap analysis reveals that the remaining work is low risk then a CB may wish to justify why this could be done by desk top review, and verified at the next visit to the organisation. However, if the gap analysis reveals that there are significant requirements to be verified and thus assessment work to be done, this is likely to necessitate a visit to the client, depending on the nature of the assessment work to be done.

There could be considerable flexibility in how installers demonstrate that they have met the scheme requirements. Smaller organisations will in general need less complex management systems, and UKAS would expect certification bodies to be pragmatic and flexible in their assessment approach. It is possible that installers could draw on templates provided by DECC, the Green Deal Oversight and Registration Body, trade associations or other bodies. Alternatively, some Green Deal Providers may provide this service to their supply chains, in which case installers will need to demonstrate how this will be used to support their compliance. It should be
noted however that EN 45011 clause 4.2.0 does not allow the CB to provide such consultancy advice. A specimen form included as Annex E in PAS 2030 might prove to be a helpful tool for some installation companies to use to demonstrate compliance with the record-keeping requirements of PAS 2030. However they would still need a procedure (PAS 2030 Clause 4.14) to describe their specific arrangements for this activity.

In addition, if there no Green Deal customers, an organisation may only be able to demonstrate how they intend to carry out and record their work, rather than to be able to provide actual records of any work that has been done. This would be acceptable subject to verification when records are available.

6b. GD ORB accepted approach to initial evaluation of Green Deal installers (information taken from GDORB COMM 003)

In June 2013, the GDORB (Gemserv) produced a communication COMM 003 v1.0 concerning the “GD ORB accepted approach to initial evaluation of Green Deal installers”. This emphasises that PAS 2031 requires both the installation service process evaluation and installation service delivery evaluation (on-site assessment) to take place in order for an accredited Green Deal certificate to be issued to an applicant installer, in line with the requirements of BS EN 45011.

DECC, the GD ORB and UKAS agreed that as an interim measure certain flexibility may be accepted in terms of how certification bodies evaluate how installers demonstrate that they meet the scheme requirements. In COMM 003 the GD ORB outlined the principles that are considered acceptable under the Green Deal scheme as an interim approach for the initial evaluation processes undertaken by accredited Green Deal certification bodies initially until 30th June 2014, pending further review by DECC, GD ORB and UKAS.

The GD ORB advises certification bodies to consult UKAS before implementing the approach described in COMM 003 to ensure that compliance with BS EN 45011 and PAS 2031 is maintained.

Installation Service Process Evaluation
During this evaluation process the certification body shall confirm that the installation process, process management, service provision and claims of conformity for the measures for which the installer has applied for certification, comply with PAS 2030.

It has been agreed that, for smaller organisations, this evaluation may take place at the installer’s registered business or at another suitable and agreed location, such as a training venue, provided that a complete evaluation can be undertaken of the applicant installer as outlined in PAS 2031. It is also possible that installers could draw on templates provided by trade associations or other bodies, subject to the certification body being satisfied that these have been integrated appropriately within the installer’s business.

Installation Service Delivery Evaluation (on-site assessment)
During this evaluation process, the certification body shall confirm the delivery of the installation service through on-site evaluation of installation activity in relation to each of the measures for which the installer has applied for certification.

Under the interim approach, in some cases the applicant installer may not have a Green Deal installation available for evaluation at the time of the initial evaluation being undertaken. In such circumstances, the certification body may issue an accredited Green Deal certificate to the installer with a condition that the first Green
Deal installation will be notified to the certification body by the installer, and the evaluation undertaken in line with the requirements outlined in PAS 2031. The applicant installer must be able to demonstrate that the competencies requirements are met before certification is granted.

The certification body shall define the timescales for the on-site evaluation to take place, which should not exceed three months of the certificate being issued. If the installer has not been able to provide a Green Deal installation for evaluation within the defined timescales, the Green Deal certificate shall lapse and the Green Deal authorisation shall be removed.

It is noted that these arrangements are for an interim period only and should only be used when the normal approach outlined in PAS 2031 is not possible.

6c. Communication between UKAS and the Green Deal Oversight and Registration Body (GDORB)

(Information based UKAS GD Communication No. 3 extended with respect to REA)

The Department for Energy and Climate Change (DECC) has appointed Gemserv and REA as the Green Deal Oversight and Registration Body (GD ORB).

From time to time UKAS will be required to provide information regarding the accreditation of individual certification bodies to the GD ORB (Gemserv and/or REA) which would normally be confidential between UKAS and the certification body. This may concern information about sanctions, complaints, extensions or reductions in scope and significant changes to the organisation. Gemserv are acting on behalf of the Secretary of State in relation to carrying out certain administrative duties for the Green Deal and therefore UKAS is confident that any information provided will be treated in strictest confidence, apart from that in the public domain.

Gemserv has set up and maintains registers for Green Deal Providers, Installers, Advisors and Certification Bodies. Most of the information recorded by Gemserv will already be in the public domain; for example, the information relating to certification bodies is mostly contained in the accreditation schedules on the UKAS website.

UKAS has agreed to notify Gemserv when a certification body is accredited for the Green Deal, or when its accreditation status changes, e.g. scope extension or sanctions. This is done by sending a copy of the accreditation schedule to Gemserv.

When UKAS GD Communication No. 3 was circulated to Green Deal certification bodies and applicant certification bodies in August 2012, all organisations were asked to confirm that they had received and accepted the communication. In future Green Deal accredited certification bodies will be asked to sign a confidentiality waiver an example of which is attached as Appendix 2.

6d. Assessment of competence of installation organisation personnel by the certification body

The Technical Annexes to PAS 2030 permit several routes to competence, including a “prior experience” route, as opposed to requiring a specific qualification. Any route is valid providing the individuals are evaluated against the competence criteria – i.e. qualifications and/or experience do not in themselves guarantee competence.
It has been claimed that some certification bodies are accepting a letter from the installation organisation, confirming that all their employees meet the relevant PAS 2030 competence criteria, without performing any checks of either the organisation’s competence process, competence records, or performing witnessed assessments on a sample to check implementation. This is not acceptable.

In surveillance visits of accredited certification bodies, and in assessments of applicant certification bodies for the Green Deal, UKAS will ensure that this aspect is covered, and relevant comments made in the assessment report.

There is also at least one ISO 17024 route to demonstration of competence for provision of Green Deal Advice.

### 6e. Impartiality

It is a requirement that Green Deal CBs demonstrate through an analysis, to the satisfaction of the assessment team, how any conflicts of interests are eliminated. Where there are related bodies, the analysis should include any conflicts of interests arising from the activities of such related bodies.

The GD Code of Practice requires CBs to provide help and advice to their certified organisations and their employees but such help and advice must not cause any conflict of interest with their certification activities. In particular, the certification body must not provide specific advice or solutions (consultancy) to their customers that would cause a conflict of interest with their certification activities.

### 6f. Microgeneration

Microgeneration measures are included in the Green Deal, but not in PAS 2030. To install GD μ-generation measures installers must be MCS-certified and must also comply with MCS 023 “Additional Requirements for MCS Installation Companies to become Green Deal Authorised” Issue 1.0 published 28/1/13.

To be accredited under MCS a certification body needs an assessment against the relevant requirements of the MCS scheme.

To operate under the GD, MCS accredited certification bodies must also have an extension to accredited scope to certify to MCS 023. They can then claim accreditation for the Green Deal, but only for those measures that have been assessed against the MCS requirements.

### 6g. Green Deal Registration for Gas Safe Registered Businesses

On 3 September 2012 the GDORB wrote to Gas Safe Registered Businesses, Gas Certification Bodies and Training and Assessment Centres to provide a clarification in
relation to the certification requirements for Gas Safe registered businesses under the
Green Deal, as follows:

1. The technical requirements for installers under the Green Deal are set out in the
BSI standard PAS 2030;

2. Certification to PAS 2030 is required in addition to holding current certificates of
competence and Gas Safe registration;

3. Installation companies are required to sign up to the Green Deal Code of Practice,
which sets out the obligations around the conduct of Green Deal participants, such as
selling practices and contracting.

The assessment by Green Deal Certification Bodies of companies installing gas
measures will include an assessment of compliance with gas safety regulations.
Therefore it has been agreed that Gas Safe registration for relevant types of work will
be accepted as a method for demonstrating compliance with the gas safety elements
of PAS 2030. However, the installation company will still be required to be certified
against PAS 2030 (in particular the quality management systems and installation
processes requirements) by a Certification Body accredited by UKAS.

In addition to this communication from the GDORB, it is noted that, as well as an
assessment of compliance with gas safety regulations, the assessment by Green
Deal Installation Certification Bodies of companies installing gas measures will
include the standards, specifications, instructions or guidance identified in C2-11 of
Table C2, at an on-site assessment.
Appendix 1: CPS & GD INSTALLATION SCOPE CLUSTERS FOR PLANNING AND REPORTING ASSESSMENTS

CPS Types of Work
1. Installation of cavity wall insulation in existing buildings
2. Installation of Combustion appliances
3. Electrical installations
4. Installation of heating and hot water systems
5. Installation of mechanical ventilation and air-conditioning systems
6. Installation of plumbing and water supply systems
7. Installation of replacement windows, doors, roof windows or roof lights
8. Installation of replacement of roof covering on a pitched and flat roofs as necessary additional work (not including the installation of solar panels)
9. Installation of micro generation and renewable technologies

Green Deal Measures
PAS 2030 Annex B (normative) BFM energy efficiency measures

B1 Measure BFM.1 Cavity wall insulation including that installed in party walls
B2 Measure BFM.2 Draught proofing
B3 Measure BFM.3 Energy efficient glazing and doors including replacement insulating glass units (IGU)
B4 Measure BFM.4 External wall insulation
B5 Measure BFM.5 Flat roof
B6 Measure BFM.6 Floor insulation
B7 Measure BFM.7 Hybrid wall insulation
B8 Measure BFM.8 Internal wall insulation
B9 Measure BFM.9 Loft insulation
B10 Measure BFM.10 Pitched roof insulation
B11 Measure BFM.11 Solar Blinds, Shutters and Shading Devices (internal and external)
B12 Measure BFM.12 Flexible thermal linings (note that this is not yet included in the Green Deal)

Annex C BSM energy efficiency measures (normative)

C1 Measure BSM.1 Chillers
C2 Measure BSM.2 Condensing boilers, natural gas-fired and liquefied petroleum gas-fired (domestic and non-domestic)
C3 Measure BSM.3 Oil-fired condensing boilers
C4 Measure BSM.4 Flue-gas heat recovery devices
C5 Measure BSM.5 Heating system insulation (ducting, pipes and cylinders)
C6 Measure BSM.6 Heating, hot water system, ventilation and air conditioning, controls
C7 Measure BSM.7 Hot water systems
C8 Measure BSM.8 Mechanical Ventilation and Heat Recovery
C9 Measure BSM.9 Radiant heating (non-domestic)
C10 Measure BSM.10.1 Under-floor heating
C11 Measure BSM.11 Warm-air heating systems (domestic and non-domestic)
C12 BSM.12 Water efficient taps and showers

Annex D BSE energy efficiency measures (normative)
D1 Measure BSE.1 Electric storage heaters (including electric warm air heating units that incorporate heat storage)
D2 Measure BSE.2 Lighting fittings, systems and controls
D3 Measure BSE.3 Variable speed drives for fans and pumps

MATCHING OF CPS AND GREEN DEAL INSTALLATION SCOPES

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<th>GD Measures</th>
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<td>1. Installation of cavity wall insulation in existing buildings</td>
<td>• Cavity Wall Insulation including that installed in party walls</td>
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<td>• Internal Wall Insulation</td>
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<td>• Loft Insulation</td>
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<td>• Floor Insulation</td>
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<td>• External Wall Insulation (Site-rendered and Pre-finished External Wall Insulation Systems)</td>
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<td>• Draught Proofing</td>
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<td>• Pitched roof insulation</td>
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<td>• Hybrid wall insulation</td>
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<td>• Heating system insulation</td>
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<td>• Flexible thermal linings (note that this is not yet included in the Green Deal)</td>
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<td>2. Installation of Combustion appliances</td>
<td>• Condensing Boilers (natural gas-fired and liquefied petroleum gas-fired)</td>
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<td>• Condensing Boilers (oil-fired)</td>
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<td>• Flue Gas Heat Recovery Devices</td>
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<td>• Heat recovery Systems (for use with gas-fired condensing boilers (domestic scale))</td>
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<td>• Radiant heating Natural gas-fired and liquefied petroleum gas-fired radiant heating systems</td>
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<td>3. Electrical installations</td>
<td>• Light Fittings, Lighting Systems and Lighting System Controls</td>
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<td>• Electric storage heaters (domestic and non-domestic) (including electric warm air heating units that incorporate heat storage)</td>
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<td>replacement insulating glass units (IGU)</td>
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<td>8. Installation of replacement of roof covering on a</td>
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<td>pitched and flat roofs as necessary additional</td>
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<td>work (not including the installation of solar panels)</td>
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<td>9. Installation of micro generation and renewable</td>
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<td>technologies</td>
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**Future measures to be added to future editions of PAS 2030**

Further revisions will take place to PAS 2030. There will therefore be a need for Green Deal certification bodies to apply for extensions to scope in the future. UKAS will need to review the changes and determine the extent of assessment needed for the new measures.
Appendix 2: Confidentiality Waiver

Commercial in Confidence

To:
United Kingdom Accreditation Service
21-47 High Street
Feltham
Middlesex
TW13 4UN

For the attention of

________________________________________

Accreditation of Green Deal Certification Bodies – Confidentiality Waiver

It is acknowledged that the Department for Energy and Climate Change (DECC) may from time to time require the United Kingdom Accreditation Service (UKAS) to reveal information to DECC and the Green Deal Oversight and Registration Body (GD ORB) regarding the accreditation of individual certification bodies by UKAS.

Therefore, to comply with these requirements UKAS is authorised to reveal to DECC and the GDORB, such information as required by the Memorandum of Understanding between UKAS and the GD ORB. This will be information on issues found during UKAS assessment of Green Deal certification bodies, changes in the accreditation status of a certification body including initial accreditation, extensions to scope, suspensions and withdrawal and also information on complaints about a certification body in connection with Green Deal activities.

It is to be understood that UKAS will in all other respects comply with the confidentiality clauses in the agreement signed between this Certification Body and UKAS.

Also, it is to be understood that UKAS will provide information to DECC and the GD ORB only as necessary for the discharge of their duties in relation to the Green Deal Programme.

________________________________________

Signature

________________________________________

Name

________________________________________

Position

________________________________________

Date

For and on behalf of:

Certification Body

UKAS Accreditation Number