

**Energy Saving Trust response to the Scottish
Government's consultation on Scottish skills
requirements for energy efficiency, zero emissions and
low carbon heating systems, microgeneration and heat
networks for homes**



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1. Installer skills requirements

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?

Yes, Energy Saving Trust agrees with the Scottish Government's proposal to integrate the installer skills matrix into PAS2030 and MCS installer standards. The availability of such a matrix will provide clarity to the supply chain and play an important role in identifying skills gaps. It will also help the Scottish Government and others with the targeting of skills funding.

We think it would be helpful for the installer skills matrix to be further developed to include equivalent qualifications from other parts of the UK (England, Wales, and Northern Ireland) and potentially also qualifications from other parts of the world. This would ensure that installers who are based in other parts of the UK and/or who qualified in other parts of the UK (or indeed in other parts of the world) would be able to easily know if they have the skills necessary to work on Scottish Government-supported programmes and be able to easily identify where further training would be required.

Q1b Do you agree with our recommendation that manufacturer training should be in addition to, not instead of, these skills requirements?

Yes, Energy Saving Trust agrees with the Scottish Government's proposal that manufacturer training should be in addition to, not instead of, recognised qualifications or equivalent. Different manufacturers will have different training schemes which are generally designed for their specific products. Having specific skills requirements for installers will ensure that there is consistency across the installer network and help to drive up standards. It will also help to discourage technical/brand bias and make it more likely that an installer would recommend the best technology for the customer's needs. This is not to say that manufacturer training is not important, and we note the important role that this should continue to play in delivering detailed product specific training.

Q1c If you disagree with these proposals, please let us know why.

N/A

Q2 – What are your views on the timing for integrating the installer skills matrix into the PAS 2030 and MCS installer standards? What do you think would be a reasonable timescale for the making the skills matrix mandatory in the standards?

Energy Saving Trust supports the Scottish Government's intention to integrate the skills matrix within PAS2030 and MCS by summer 2021 and agrees with the consultation's

proposal that the skills matrix is “...initially included as a guide for achieving competency within the standards” and that it will become mandatory “within a reasonable timescale to allow installers to meet these requirements”. We do not have sufficient evidence to be able to comprehensively advise on what a “reasonable” timescale would be. This will very much depend on both the availability and length of training courses across Scotland and the availability of funding and support to enable the supply chain to upskill their staff. Due to the scale and urgency of the heat pump-rollout, the need to maximise confidence amongst consumers who will be switching to new technology for them and the fact that poor installation can dramatically affect CoP of a heat pump, we note that a reasonable time should be as short as possible.

Q3 – What are your views on how installers can meet these skills requirements, in particular the Recognised Prior Learning (RPL) route?

This is not an area where Energy Saving Trust has detailed expertise. However, we would like to use our response to this question to emphasise that we believe that the Recognised Prior Learning (RPL) route has an important role to play in engaging and encouraging suppliers to diversify – for example specific professions could be targeted with clear, logical pathways, e.g. “solar PV for electricians”. It will be important that financial support is provided whilst people reskill to avoid the disincentive of a reduced income during the training period.

We also note that the section of the consultation dealing with Recognised Prior Learning suggests that “Local colleges can support industry to develop pathways to support installers to achieve minimum competencies”. While we acknowledge the close working relationship that local businesses often have with local colleges, we believe there could be scope for pathways to be developed centrally and shared with local colleges as this could avoid considerable duplication of effort.

2. PAS 2035 requirements for other roles

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

Again, this is not an area where Energy Saving Trust has detailed expertise. However, we support the general principle that greater levels of competency should be required for higher risk projects.

3. Heat Networks

Q5 – What are your views on our plans for developing heat network skills? For example, are there any gaps in heat network skills that we haven't identified?

Energy Saving Trust believes that the Scottish Government's plans for developing heat network skills – through the identification of skills gaps and training needs in the sector and associated work to ensure these are filled, along with work to develop technical standards for heat networks – are sensible and necessary. It is vital that these skills are available locally to help reduce operational costs and maintain security of supply for end users.

We would like to emphasise the importance of not losing sight of the value of wider 'softer' skills such as stakeholder engagement and customer focus as without customer engagement switching to heat networks simply won't happen. Good consumer and stakeholder communication skills will be essential for ensuring good consumer outcomes.

We look forward to continuing to work with the Scottish Government through the Sustainable Energy Supply Chain Programme to help ensure that the district heating supply chain can meet expected growth in demand for the skills necessary to design, install, commission, and maintain heat networks.

4. General questions

Q6a – What impact do you think our skills requirements will have on the energy efficiency, microgeneration and heat networks sector in remote rural and island communities?

With the right interventions, support (including, but not limited to, the provision of support where appropriate, for local colleges and training centres to provide training, and support in the form of subsidy for those who have to travel considerable distances to access necessary training courses) and certainty provided by the Scottish Government (see response to question 10 below) we believe that the proposed skills requirements have the potential to drive up the quality of installations in Scotland, reduce costs, as well as improving security of supply (a particular challenge in remote locations). It will also be important to ensure that the supply chain is given sufficient time to meet the proposed skills requirements – not doing so could have a negative impact on programme delivery.

One of the key challenges for remote rural and island communities will be that some local colleges simply won't be able to deliver the necessary training courses which means that installers and those wishing to train for the other roles discussed in the consultation would need to go to the mainland/to a more populated area for training – with associated travel and accommodation costs. This would put an additional burden onto installers (and those wishing to train for other roles) living and working in these areas which could act to deter them from undertaking training and/or force them to increase the price of their work to recover these costs. And we already know that the cost of undertaking work and availability of suitably qualified/certified tradespeople are key issues for remote rural and island areas – so these skills requirements, if not accompanied by appropriate financial support packages could act to exacerbate both of these issues.

The evidence we have on these issues stems from our work managing the Sustainable Energy Supply Chain Programme¹ and the Home Energy Scotland advice network on behalf of the Scottish Government. We know from previous research² that has been undertaken under the Sustainable Energy Supply Chain programme that people living in remote rural and island areas often prefer to use local businesses, both on the basis of trust and to support the local economy. As a result, some householders end up “*using local, non-certified businesses to complete their installations*”. This has meant that where systems have not been signed off as MCS compliant then it has not been possible to

¹ See: <http://www.energysavingtrust.org.uk/scotland/businesses-organisations/supply-chain>

² [Supply chain analysis of remote rural and island areas – March 2015](#)

claim the RHI or a Scottish Government loan and in such cases systems will have been installed without government support and without the same level of quality oversight and consumer protection.

We also have feedback from Home Energy Scotland staff working in remote rural and island areas. So, for example, if work was to be carried out on the Isle of Arran a team of installers would need to stay overnight and this would be reflected on the customer's quote along with the cost of transportation. The Home Energy Scotland specialist advisors have suggested that a typical air source heat pump installation on the island would typically cost at least £1,000 more than the same installation on the mainland. If there were local qualified installers who were supported to grow with the local heat pump markets these costs could be avoided and rural economies could be strengthened

Q6b – What impact do you think our skills requirements will have on the energy efficiency, microgeneration and heat networks sector in Scotland more generally?

While the issues outlined in our response to question 6a above (additional costs and a limited pool of installers/those qualified to undertake the other roles covered in the consultation document) are undoubtedly more pronounced in remote rural and island areas they are also an issue across Scotland (and indeed the rest of the UK – where householders applying for the Green Homes Grant have reported difficulties finding accredited installers to do the work³) more generally. So, as in remote rural and island areas there is a risk that in Scotland more generally that the new skills requirements could lead to fewer installations taking place than might otherwise be the case. However, again, as noted above with the right interventions to mitigate the impacts on rural and island areas, support and certainty provided by the Scottish Government (see response to question 6a above and question 10 below) we believe that the proposed skills requirements are necessary to build confidence and maintain quality in the sector. It is imperative that the necessary skills are developed in tandem with the growth of the sector to minimise skills gaps and promote best practice.

Q7 – What impact do you think our skills requirements will have on competition including training provision, quality, availability or price of any goods or services in a market?

See responses to questions 6a and 6b above.

³ See for example: <https://www.theguardian.com/environment/2020/oct/09/green-homes-grant-installers-scheme-government>

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

Energy Saving Trust believes that digital technology has a vital role to play in meeting the Scottish Government's skills requirements. We believe that where any training can be done online it should be done online. We also note that digital technology has a key role to play in making technologies like heat pumps accessible – particularly for those that may not have a training heat pump (i.e., a heat pump that can be used for training purposes) available locally.

Q9 – Are there any areas of skills we have not covered in this consultation that you think we should consider?

We split our response to this question into two areas – the first being a skills area not covered in the consultation that we think the Scottish Government should give further consideration to and the second being a request for greater clarity about how the advice provided by the retrofit co-ordinators and assessors will interact with that provided by Home Energy Scotland advisors and specialist advisors.

1) Skills not covered in the consultation

It is important that any training provision includes advocacy and engagement skills to enable installers to discuss different heating options, outline the benefits of low and zero emissions systems and provide reassurance. Recent market research carried out in 2021 to inform promotional campaigns for Home Energy Scotland underlines the trust that people have in installers with almost 90% of people saying that confidence in their installer was one of the primary aspects of importance when choosing to use a new system with a different type of technology.

Given that hot water production accounts for 12% of the energy used in a home we think it is important that appropriate training courses are developed around water efficiency – including the role of both water efficient products/fittings and behaviour change.

2) Interaction between advice provided by retrofit co-ordinators and assessors and that provided by Home Energy Scotland advisors and specialist advisors.

We would welcome greater clarity about the proposed interaction between the advice that will be provided by retrofit co-ordinators and assessors and that provided by Home Energy Scotland advisors and specialist advisors. It is important that the customer journey is as straightforward as possible. We appreciate that further thought and discussion may be required in this area and we would welcome the opportunity to feed into this and would be happy to facilitate a more detailed discussion if this would be useful.

Q10 – What support you think would help the sector achieve these skills requirements?

Feedback that we continually receive from the supply chain through our work with them on the Scottish Government's Sustainable Energy Supply Chain Programme, suggests that the most important thing that can be done to ensure that local supply chains are expanded and up-skilled is for the Scottish Government to provide them with long term certainty – in terms of what the Scottish Government plans to do and how much funding will be allocated. The view from some suppliers is that this time period needs to be at least 5 years. With long term certainty of funding comes long term confidence to invest in training and staff.

While the designation of energy efficiency as an infrastructure priority back in 2015 and the on-going development of the Energy Efficient Scotland schemes to deliver against this and recent budget commitments of £1.6 billion investment to transform heat and energy efficiency of buildings in Scotland goes a long way in providing such certainty, there is still some scepticism –driven by both the lack of detail around some of the key drivers of demand (e.g. regulation) and the previous stop-start nature of support for energy efficiency – within the supply chain.

As the delivery ambition steps us there will be an on-going need to develop concrete policies that will deliver demand certainty as well as a continued need to engage with the supply chain to emphasise the Scottish Government's commitment to this agenda and the wider work it is doing to support the supply chain and to encourage consumer demand for energy efficiency and low carbon heat.

As noted in our response to question 6a above we also believe that there is a need for the Scottish Government to develop a package of support for the supply chain that could include, for example, funding to attend, and where appropriate (for example for those living in remote rural or island areas) relevant training courses) travel to, relevant training courses. If, as the consultation suggests, the Scottish Government adopts PAS2035 requirements, it will be important that the Scottish Government supports the costs of this certification for SMES through grants or loans. We also recommend that the Scottish Government provide financial support to people whilst they reskill in order to avoid the disincentive of a reduced income during the training period.

We also think it will be important for the Scottish Government to work with supply chain organisations such as SNIPEF to incentivise additional uptake of the renewables modern apprenticeship pathway, and introduce shorter, conversion courses for those coming into the industry from other sectors. This will require agreeing suitable provision of courses and places with the Scottish college network. In addition, we think that the Scottish Government should work through SNIPEF to agree targets for numbers of

apprentices training to install heat pumps, with the supply chain agreeing to host the agreed number of apprenticeship places and, importantly, jobs for those apprentices when they are trained. It is also important to note that rural economies could be strengthened if indigenous SME installers are supported to grow with the local markets (e.g. heat pump markets) rather than additional capacity to satisfy demand being supplied to these markets from larger regional or national installers.

Feedback from industry representatives to the Sustainable Energy Supply Chain Programme has also highlighted that that industry representatives do not believe that their industry is attractive enough to young people and that they would welcome Scottish Government interventions to help to remedy this.

We look forward to continuing to work with the Scottish Government through the Sustainable Energy Supply Chain Programme to ensure that suppliers are aware of the opportunities, to provide support for training by working with partners such as the Energy Skills Partnership (representing Scottish colleges) and Skills Development Scotland and helping suppliers bid more effectively for public sector contracts through a procurement guide and webinars.