



Energy Performance of Buildings Directive Programme

Energy Performance Certificates (EPCs) in the Social
Rented Sector:

Guidance on sampling for Domestic Energy Assessors

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1. Purpose and Scope

This section provides details on the purpose and scope of this document.

1.1 Background

Domestic energy assessors (DEAs), whether accredited by the qualification or APEL (Accreditation of Prior Learning) route have not, up to now been involved in the production of EPCs in the Social Rented sector. The main difference in producing EPCs within this sector is that the DEA may have to employ a sampling approach whereby only a sample set of properties are visited and subsequent EPCs for properties that are the same are cloned from that sample set.

Although sampling is noted in the National Occupational Standards for DEAs assessors have thus not been required to undertake sampling training.

Furthermore the qualifications provided by ABBE, City and guilds and NAEA do not, by design, yet include the assessment of the specific skills involved in this activity (although unit 3.3 of the National Occupational Standards on which the qualifications are based – reproduced as an appendix to this guide – describes the skills and knowledge needed).

1.2 Purpose

This document therefore describes the approach for a sampling methodology. It also aims to establish a clear distinction between the responsibilities of the Social Housing Provider and the Accreditation Schemes relating to the sampling process. The information contained within this document will provide DEAs with an understanding of the Social Housing environment and the issues in completing the sampling process.

1.3 Scope

This document provides a background to Social Housing and a suggested strategy for sampling within the Social Housing market.

This document is the basis on which accreditation Schemes should implement an approach to sampling. The method described here lays out the three phases of activity that need to happen in order for a cohort of similar properties to be identified, sampled and for actual and cloned EPCs produced.

Accreditation Schemes are expected to use this document to enable their DEA membership to undertake work in the social rental sector.

2. Background to Social Housing and Terms of Reference

2.1 Definition of Social Housing

Social Housing is housing for rent provided by the state/government and also semi-independent, not-for-profit housing providers known as Housing Associations (HAs), or more recently Registered Social Landlords (RSLs).

2.2 History of Social Housing

Historically, public housing was known as Council housing and was provided solely by Local Authorities (LAs), for example City, District and Borough Councils. As described above, there are now multiple housing providers in the Social Housing sector including RSLs, ALMOs (Arms Length Management Organisations) and TMOs (Tenant Management Organisations).

Council housing was previously accessible to all. With Right to Buy (the selling of properties to tenants) and the reduction in the building of new Council houses, the supply of properties declined. This resulted in the need to ration the remaining properties to those residents in the greatest need. With the shift in management style from a contractual role to a social welfare role, public housing has more recently been known as Social Housing.

Up to 1930, Council housing was accessible to anyone who could pay the rent. It tended to exclude those most in need because rents were high.

In the 1930s, housing conditions were poor and Local Authorities were re-housing those from slum clearance. Thus, they were housing those in greatest need and taking more of a social welfare approach.

After the Second World War, Council housing was again accessible to all. This was due to the increase in building for rent by the Labour Government.

As well as the public sector expanding, home ownership also increased among higher and middle income groups. The ethos of home ownership was promoted as the tenure of choice.

Local Government reorganisation in the 1960s and 1970s saw the merging of Local Authorities into large authoritative bodies.

The Housing Act of 1980 saw the introduction of the 'Right to Buy' (RTB) for secure tenants and this, along with significant cuts in public expenditure, resulted in a dramatic decline in the standard and availability of properties. Home ownership grew and, Council housing stock reduced. The government also started its drive to transfer stock to the private sector or to Housing Associations, through Tenants' Choice, LSVT (Large Scale Voluntary Transfer) and CCT (Compulsory Competitive Tendering). The government of the time saw Local Authorities as being monopolistic and bureaucratic and Housing Associations became competitors to Local Authorities.

When Labour was elected in 1997, CCT was replaced with the Best Value framework. The Labour government has continued with the concept of

transferring homes and has encouraged competition between social landlords. Where LAs retain their stock they are being encouraged to separate out the management and ownership of properties by outsourcing to the private sector.

With the change in state provision, the historical focus on home ownership and the selling off and transferring of stock, social housing is seen as a safety net providing for those most in need.

2.3 Property/Stock Profile

2.3.1 Size and Location

Local Authority Housing Departments, ALMOs and HAs (that have been created solely as a result of LSVT) are likely to have a concentration of properties on housing estates. The locations of these organisations tend to reflect the local authority boundaries and can be both urban and rural.

The size and location of RSLs varies tremendously. Some RSLs are large and have properties spread across whole regions. Some are larger and operate nationally. These RSLs are likely to have concentrations of stock and also scattered properties as they acquire smaller HAs or purchase properties from the private sector.

2.3.2 Development/New Build

Some RSLs have development sections and are responsible for new build schemes. Properties built by RSLs in the past have typically been concentrated into estate style areas. However, more recently, RSLs have been working in partnership with others to provide mixed tenure schemes, thus avoiding a concentration of social housing properties in one area and contributing to a more balanced community.

2.3.3 Specialisms

Some RSLs may specialise in the provision of accommodation for sectors of the community, for example, supported housing for the elderly or BME (Black and Minority Ethnic) communities. Where there is a support provision, the stock is likely to be grouped into Schemes with Scheme Managers, on site wardens and caretakers.

2.3.4 Property Type

Residential property types will vary between housing organisations but are likely to include:

- Flats
 - Low rise
 - Medium rise
 - High rise
 - Purpose built
 - Conversion
- Houses
 - Terraced

- Semi-detached
- Detached
- Maisonettes
- Bungalows
- Pre-fabricated
- Caravans (and caravan plots)
- Mixed use developments, i.e. flats above shops.

Non-residential property types are likely to include:

- Garages
- Shops
- Other commercial properties

2.3.5 Property Age

Property age varies between housing organisations. Property ages are likely to include:

- Pre-War (1919)
- Post War (1945)
- 1950s
- 1960s
- 1970s
- 1980s
- 1990s
- 2000 to the current day

LAs are likely to have properties built prior to the 1980s.

2.3.6 Condition

The condition of the stock varies between housing organisations. LA stock is generally in poorer condition due to past under funding.

RSL stock is generally in better condition. However, as described above, this can vary dependent on where the stock came from i.e. a stock transfer from a LA or new build etc.

All housing organisations have a target of bringing their stock up to a decent standard by 2012. This has been an influential factor in LA housing departments transferring their stock, in order to access private funding to enable them to achieve the standard. This is known as 'Decent Homes' in England, the Welsh Housing Quality Standard in Wales and the Scottish Housing Quality Standard in Scotland.

2.4 Tenant Profile

Again, the tenant profile varies between housing organisations. Generally, there has been an increase in the level of the economically inactive occupying properties in the social sector.

This is due, firstly, to those who are economically active (e.g. in regular employment) tending to move out. It is believed this is due to the ethos of home ownership being the tenure of choice and Social Housing being perceived to be the least desirable tenure. People tend to regard Social

Housing as a temporary move while trying to access other tenures. However, those on lower incomes can often be unsuccessful and return following repossession or affordability issues.

Secondly, there is an aged population that remains in Council property.

Thirdly, with policies such as 'Care in the Community', there are a large number of vulnerable people with support needs.

Lastly, incoming tenants tend to be young, lone parents.

With the change in tenant profile resulting in vulnerability, 'supporting people' legislation was introduced.

As described above, some organisations will be dedicated to providing accommodation for those with support needs. This can include support for older persons, the mentally and physically disabled and BME communities who encompass multiple ethnic groups and many languages, often where English is not their first language. In general, most housing organisations will have a split of 'general needs' and 'supported housing'.

3. Social Housing Sampling

3.1 What is Sampling?

Sampling is the process of selecting units from a population of interest so that by surveying the sample you can fairly generalise the results and apply them to the production of EPCs for similar dwellings in the population from which they were chosen.

In order to use sampling, the stock of properties of interest to the social housing provider must be divided into groups of properties, within which all of the properties are expected to be similar. For each group, a sample of properties can then be inspected and, if the properties are found to be sufficiently similar to justify doing so, the results can be copied and used to produce an EPC for those properties in the group that were not inspected directly; this process is referred to as cloning.

The division of properties into groups that are sufficiently similar that sampling and cloning is appropriate (i.e. they are coherent groups) is the responsibility of the social housing provider. Social housing providers may undertake the task in-house or use consultants to help them and a suggested approach is outlined, although the actual approach may vary depending on the size of the housing stock, the availability of information and knowledge within the organisation and any existing stock management procedures.

Once presented with one or more coherent groups of properties, the DEA is responsible for selecting a sample of properties from that group, undertaking inspections for each sampled property and using the results of that exercise to determine whether the group is indeed coherent (so that cloning is appropriate) or not (in which case either further sub-division of the group is required by the social housing provider or the entire group will need to be inspected).

3.1 The Advantages of Sampling

The advantages of sampling are generally appreciated and include:

- Time Savings
- Cost Savings
- Environmental Responsibility

Surveyors are carrying out stock condition surveys on a smaller number of properties and obviously this saves time and money.

3.2 The Disadvantages of Sampling

Some Social Housing Providers have stopped using sampling for stock condition purposes. This is generally because they have found the data collected to be unreliable when cloned across the remainder of the group. They are of the view that 'no information is better than the wrong information!'.

4. Sampling Process

4.1 Process Overview

The approach described here comprises three phases that will enable the social housing provider and DEA to deliver EPC to a consistent standard in the social rented sector.

Phase	Description	Responsibility
<p>Phase 1: Housing Stock Analysis</p> <p>See Section 4.4.1</p>	<p>This section describes how a social housing provider could breakdown their housing stock into coherent groups for sampling purposes.</p> <p>This analysis may be undertaken by the social housing provider or by a specialist or consultant and will generate a series of groups that are expected to be coherent, so that the DEA will then apply sampling approach.</p> <p>Although the DEA may not be directly involved in this phase, it would be useful if they understood how the RSL or LA came to their conclusion around the batches.</p> <p>The output of this phase is a number of groups of properties that are thought to be coherent and therefore suitable for sampling, together with a list of exception properties that will need to be inspected individually.</p>	<p>Social Housing Provider</p>
<p>Phase 2: Visual Inspection of Identified Group of Properties and Sample Selection</p> <p>See Section 4.4.2</p>	<p>This section describes how the DEA should undertake a preliminary visual assessment of a nominated group of properties to verify that they appear to be coherent.</p> <p>Subject to the visual inspection, the criteria for selecting a representative sample of properties from the group are defined.</p> <p>The output of this phase will be a specific schedule of properties to be inspected from a group.</p>	<p>DEA</p>
<p>Phase 3: Analysis of Results of Sampling</p> <p>See Section 4.4.3</p>	<p>This section describes how the DEA should interpret the results of the inspections on the sampled properties to determine whether cloning can be used.</p> <p>Depending on the findings, the DEA may be able to proceed with producing cloned EPC, or may need to undertake additional inspections or may have to advise the social housing provider that the group of properties specified is not coherent and is therefore unsuited to sampling and cloning.</p>	<p>DEA</p>

4.2 Accreditation Schemes

All EPC have the same legal status, whether they are produced from an individual inspection or through cloning. Users of the EPC therefore enjoy the same legal rights and protection.

Accreditation schemes are therefore responsible for ensuring that the EPC produced by their members are of sufficient quality.

Accreditation schemes are initially responsible for ensuring that any DEA undertaking sampling and cloning is competent to do so. This is expected to be achieved through individuals undertaking appropriate continuous professional development (CPD) process.

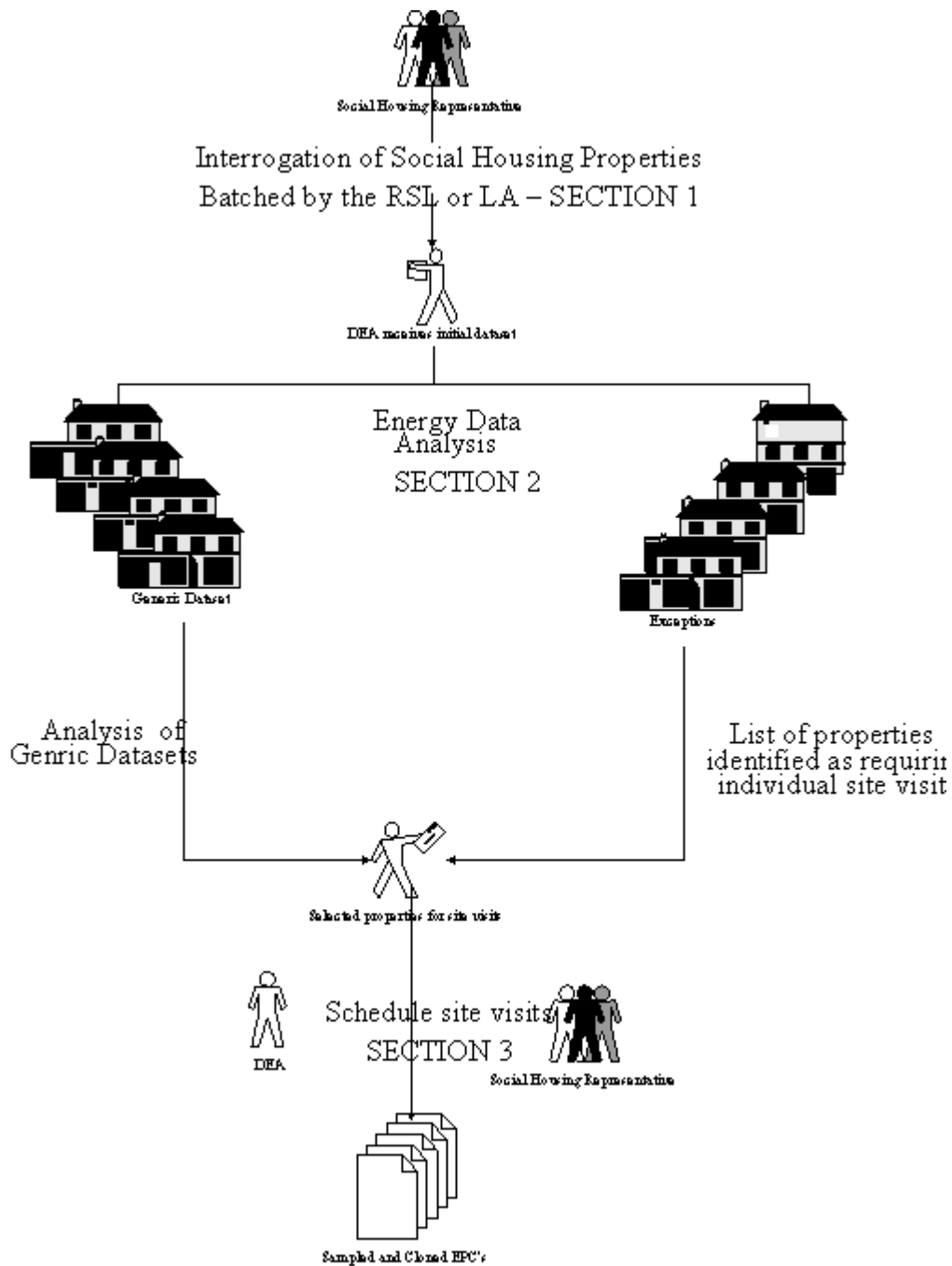
Accreditation schemes will monitor the application of this process through their quality monitoring process. Although schemes will take an interest in how all the Phases of this process are implemented they will only formally review the application of phases 2 and 3, which relate directly to the activities of the DEA.

It is important to note that decisions on how many properties to sample within these batches will be made by individual DEAs – not social landlords or other external parties. It is thus essential that consistent principles are established at the outset and applied by all DEAs

Accreditation Schemes will expect the DEA to produce evidence of his part of the sampling process. In addition to the record of inspection and photographs for the assessed properties, the accreditation scheme will expect the following information to be appropriately documented:

- the schedule of properties sent to them by the Social Housing provider
- A calculation to show how the DEA calculated the number of properties to sample and which specific addresses
- The results of each of the EPC samples generated
- Comparison of these results with the specified tolerance range for cloning
- How the DEA selected the EPC to be cloned.

4.3 Process Flow



4.4 Sampling: Phase by Phase

This section describes each of the three Phases in the sampling process.

4.4.1 Phase 1: Housing Stock Analysis

The objective of this Phase is for the social housing provider to divide their stock into a number of coherent groups of properties to which sampling and cloning can be applied, together with a list of properties requiring individual inspections.

Social Housing Providers will undertake this activity. However, it is advisable that the DEA understands the processes behind that batching and how the property grouping was derived.

Depending on the stock of properties owned or managed by the social housing provider and the information they hold, the basis of defining coherent groups of properties will be more or less complex. The fundamental principle is that the grouping is seeking to identify groups of properties with the same energy efficiency characteristics.

For example, a tower block or a terrace of properties may have started off as identical, but if they have been subject to different levels of refurbishment for items that influence the energy efficiency of the property (e.g. insulation, heating or glazing), they may no longer constitute a coherent group.

One approach that a social housing provider with a mixed stock may wish to adopt will be to start with a database of all of their properties containing whatever information they have on the physical and energy efficiency related characteristics of the properties. By applying a series of criteria, the properties are divided into groups sharing similar traits and therefore likely to be suitable for the application of sampling and cloning.

This would involve applying the following criteria in sequence:

1. Divide into properties to be included / excluded from the assessment;
2. Divide into geographically distinct groups of properties;
3. Divide each group from previous step into properties with the same age and built-form;
4. Divide each group from previous step into properties with the same space and water heating fuel;
5. Divide each group from previous step into properties with the same space and water heating system;
6. Divide each group from previous step into properties with the same retro-fit loft and wall insulation;
7. Divide each group from previous step into properties of the same size / number of bedrooms.

Ideally, the division into groups at each of stages 3 to 6 should be based on the RDSAP dataset i.e. the RDSAP age bands, built forms, heating types etc. However, this will depend on the extent and quality of the data held by the social housing provider.

For flats and maisonettes it is important to take account of the heatloss surfaces, therefore the built-form should distinguish between top-floor, mid-floor and ground-floor. Therefore, for the purpose of producing EPC, a top-floor flat would be in a different group to a mid-floor flat in the same block.

At each stage in the process, there will be groups of properties that can be taken forward to the next stage. There will also be properties which do not fit into any sizeable group and which will therefore have to be subject to individual inspection to produce an EPC for that property.

The output from this phase of work will be:

- A number of groups of properties consisting of properties which are considered coherent and therefore suitable for sampling and cloning to produce EPC;
- A list of properties requiring individual inspections to produce an EPC

Details of the properties in each group of properties will be provided to the DEA for the next phase of the process.

4.4.2 Phase 2: Visual Inspection of Group and Sample Selection

The objective of this Phase is for the DEA to validate the group of properties provided by the social housing provider and to produce a list of representative properties to inspect in order to determine whether cloning can be used.

On receiving a list of properties that the social housing provider considers to be a coherent group, the DEA should request details of the “definition” of the group and the process by which it was created. An example group definition might be:

- *The group comprises 1900-1929 semi-detached three-bedroom properties with single glazing and gas-fired central heating and hot water provided by 10 year old combi boilers and with loft insulation installed in the 1980s*

Visual Inspection

Given the group description, the first task of the DEA is to undertake an external visual inspection of all of the properties. This will involve simply visiting the location of the properties and visually inspecting the external attributes of each property.

The external inspection is assumed to be undertaken from the property boundary. Unless specifically agreed with the social housing provider, a DEA is not expected to enter individual gardens, but would be expected to take advantage of any public space to achieve the best possible view of the property without intruding on the privacy of the tenants.

The purpose of the visual inspection is as follows:

- Easy identification of non-standard properties that can be removed from the dataset and scheduled for individual site visits.
- Assessment of whether the remaining properties are likely to constitute a coherent group or whether the group needs to be broken up into smaller property sets.

Not all features of the group definition can be checked through an external visual inspection, but key construction aspects can be usefully checked to avoid obvious errors and wasted sampling.

Things to be look out for when undertaking the visual inspection are:

- Do the properties all conform to the overall description of the group nominated by the client? *(e.g. there is clearly a problem if the client has specified that they believe the group comprises 1900-1929 semi-detached properties and it turns out that some of the properties are flats or detached or clearly built post-war)*
- Are there any fundamental discrepancies between the construction of the properties that would affect result or recommendations? *(e.g. some have flat roof and others have pitched)*
- Have any properties been converted with a room in the roof or is there evidence of other work that suggests the property has been changed in a way that is fundamentally different to the other properties in the group?
- Are there visible differences in the use of external cladding or cavity fill insulation between the properties?
- Is the glazing different to the other properties in the group?
- Do any properties have conservatories?

If this visual inspection identifies more than 10% of properties in the group as being clearly different from the others in the group, the DEA should review the results with the social housing provider / client before proceeding with the sampling.

Sample Selection

The number of properties to be inspected (the sample size) depends on the size of the group as specified in Table 1 below.

Table 1. Dataset Sample Size

Size of Group	Sample Size	Contingency Sample Size
10 properties or fewer	50%	An additional 20% of group
11 – 50 properties	5 plus 30% of (group minus 10)	An additional 10% of group
Over 50 properties	15 plus 10% of (group minus 50)	An additional 5% of group

Once the sample size is known, the actual selection of properties can take place. There are two sets of factors that should be taken into account:

- A random spread across the group; and
- Access constraints.

The results of the visual inspection can be helpfully used to assist in determining the actual spread of properties. For example, there may be several different designs of property within the overall group (albeit that they all have the same age / built-form / size) and the sample should include a spread across these designs.

Similarly, the sample should include properties from across the geographical spread of the group, rather than being tightly grouped.

In a group comprising mid-floor flats in several blocks, the sample should include properties from each of the different blocks and should also look for those in each of the different locations and designs within the blocks.

Access considerations may also need to be taken into account when selecting properties. This is an issue that will need to be agreed with the social housing provider / client and will depend in part on their policies. Issues to be considered will include:

- Notification arrangements – who has access to tenant details, who will contact the tenant to schedule visits and what form of notification should be used?
- Void properties – should these be included or excluded?
- Are any of the properties occupied by a tenant requiring an accompanied visit?
- What password and identification arrangements are required, particularly for vulnerable tenants?
- Are any of the properties occupied by a tenant where there is a history of problems gaining access?

In planning the inspection of the sample properties it is important that provision be made for properties where no access is possible despite prior

arrangements having been made. The contingency sample size in Table 1 is suggested as being suitable for planning purposes.

The output from this phase of work will be:

- A completed external visual inspection of all properties in the group defined at phase 1;
- A list of properties identified by the visual inspection as requiring individual inspections to produce an EPC (and which are therefore excluded from the group); and
- The results of inspections for a representative sample of properties from a remainder of the group.

The results of the inspections of the sample properties are used at the next phase to determine whether cloning is possible and to produce the cloned EPC.

4.4.3 Phase 3: Analysis of Results of Sampling

The objective of this Phase is for the DEA to use the results of the sample inspections to confirm whether the group is indeed coherent and, if so, to produce the cloned EPC for those properties in the group that were not inspected.

The principle being followed is to identify the “typical” or “standard” result from the sampled properties and determine whether the variation amongst the other properties is sufficiently small that it is reasonable to use the “typical” result as the basis for cloning EPC for those properties that were not inspected.

For the purpose of producing EPC, the **standard** record is considered to be the median record when ranked by:

- Increasing SAP rating; then
- Increasing EI rating; then
- Decreasing floor area.¹

In order to determine whether cloning is acceptable, the results of the inspected sample should be compared with the tolerances specified in Table 2.

¹ In order to determine the median record, order the records of the sampled properties in order of increasing SAP rating. If there are multiple records with equal SAP ratings, then these records should be put in order of increasing EI. If there are records with the same SAP and EI ratings, then they should be put in order of decreasing floor area.

Having ranked the records on this basis, the median record is the middle record or, if the number of records (i.e. the sample size) is even, then the median record is the record with the lower SAP / EI or higher floor area of the middle two records.

Table 2. Sample Tolerances

Parameter	Tolerance
SAP rating	90% of the sample properties should have a SAP rating within +/- 4 SAP points of the SAP rating of the median record; and 95% of the sample properties should have a SAP rating within +/- 6 SAP points of the EI rating of the median record
EI	90% of the sample properties should have an EI rating within +/- 4 EI points of the SAP rating of the median record; and 95% of the sample properties should have an EI rating within +/- 7 EI points of the EI rating of the median record
Floor area	90% of the sample properties should have a floor area within +/- 5% of the floor area of the median record; and 95% of the sample properties should have a floor area within +/- 7.5% of the floor area of the median record.
Recommendations	95% of reports contain identical recommendations; and No reports contain recommendations that would be fundamentally inappropriate for other properties in the sample. ²

If, following the analysis of the initial sample, the results are outside these tolerance limits, then the process is as follows:

- 1 Identify any exceptions. What has caused them to be exceptions? Report findings to the social housing provider / client to consider whether data they already hold or data from the external visual inspection can be used to allow them to repeat the stock analysis taking account of this feature in order to create more coherent groups.
- 2 If there are no clear traits identified that are causing the exceptions, agree with the social housing provider / client whether to expand the sampling.
- 3 If the client instructs DEA to proceed with additional sampling from the original groups, select an additional sample 30% of the size of the original sample and undertake inspections on these properties.
- 4 Add the additional results to the collected dataset and see whether larger sample complies with the cloning tolerances.
- 5 If necessary, keep repeating these steps until the tolerances are reached or the entire group has been inspected individually.

NB: if there is a problem with one or more reports including recommendations that would be fundamentally inappropriate for other properties in the group,

² For example, no report should include a recommendation to install cavity wall insulation if there are other sample properties with solid walls.

this cannot be resolved by increasing the sampling. The only way to resolve it is to redefine the groups (possibly using information from the external visual inspection undertaken by the DEA).

It is the responsibility of the social housing provider to repeat the analysis of their properties if cloned EPCs cannot successfully be produced. The DEA can only advise of his/her finding and the final decision for taking the work forward is with the social housing provider / client.

5. Guidance for Issuing Sampled EPCs and Cloned Certificates

5.1 Sampled EPC Production

These will be no different from the normal private sector housing EPCs as you will have carried out a site visit and have site notes to back them up.

5.2 Cloned EPC Production Rules

Having identified the standard (i.e. median) record for the group, the DEA can copy this exact dataset in order to produce cloned EPC for those properties that were not inspected for sampling.

Auditing of the cloned EPCs will be handled by Accreditation Schemes and specific guidance on software issues and supporting evidence requirements to support auditing will be issued by the individual Accreditation Schemes.

6. Conclusion

In conclusion, for a DEA to use sampling and cloning to produce EPC for social housing providers they must have completed appropriate CPD to demonstrate their understanding and competence to apply the framework defined in this document.

Accreditation Schemes are required to implement appropriate CPD programmes and to modify their QA framework to take account of the defined framework.

The DEA and the Accreditation Schemes remit extends only to phases 2 and 3 of the outlined framework. The responsibility for the initial data analysis is outside the regulated framework and quality assurance regime of the DEA and Accreditation Schemes.

APPENDIX A: Extract from DEA National Occupational Standards

Relevant extracts from DEA National Occupational Standards demonstrating the requirement for DEAs to have an understanding and ability to apply sampling when required:

Element 3.3 Identify representative properties for inspection in appropriate circumstances	
Performance Criteria - You must be able to:	Knowledge and Understanding - You must know and understand:
1 request relevant information relating to the properties in question from the owner or manager of those properties	(a) relevant guidance relating to the identification of representative properties
2 take appropriate action where the required property information is not forthcoming, is incomplete or is inaccurate	(b) the range of information required relating to the properties in question, and the potential sources of such information
3 evaluate information relating to properties in order to determine their similarities and differences with regard to factors likely to affect energy performance	(c) the criteria for determining representative properties, and how they can be applied in different circumstances
4 identify, from your evaluation of the information , a property or number of properties that are representative for the purposes of assessing energy performance	(d) the action to take in cases where the required property information is not forthcoming, is incomplete or is inaccurate
5 where it is not possible to identify any representative property/properties, record your rationale and explain the situation to the owner or manager of the properties	(e) the factors that affect the energy performance of buildings
6 justify your reasons for selecting specific representative properties in a clear and concise manner	(f) how to evaluate information relating to properties in order to their determine similarities and differences with regard to the factors likely to affect their energy performance
	(g) the definition of a representative property
	(h) how to identify a property or number of properties that are representative for the purposes of assessing energy performance
	(i) the potential consequences of choosing inappropriate property/properties
	(j) the importance of recording and communicating your reasons where it has not been possible to identify representative property/properties
	(k) the importance of being able to justify your reasons for selecting specific representative properties

Element 3.3 Identify representative properties for inspection in appropriate circumstances	
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	(l) the importance of testing the accuracy of the information on site in order to confirm that it is appropriate to use the data
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