



# Procedure

## RHI Data Sharing Procedures.

RHI procedures to cover the internal and external sharing of RHI data, principally for anti fraud purposes	Author	Morag Drummond
	Audience	RHI Operations
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### 1. Introduction

1.1. The RHI Operations team, through its accreditation processes, periodic data approvals, and subsequent audits, gains information about the performance of RHI industry members, particularly RHI applicants and participants, installers, Independent Report on Metering Arrangement (IRMA) providers and manufacturers. Sharing information will help facilitate an improvement in the performance and consistency of these bodies and can add in a valuable anti fraud control.

1.2. In particular IRMAs are frequently found to be sub-standard. In order to identify poor performers to the renewable heat industry the RHI Operations Team will alert the relevant training and assessment bodies, as well as the individuals concerned.

1.3. Where Ofgem finds errors in MCS certificates provided by RHI applicants these will be reported to Gemserv, who are responsible for the MCS, so they can take remedial action.

1.4. A list of the make, capacity and model of equipment which forms part of RHI accredited installations will be published on the RHI website. Certain boilers which have been identified as performing very badly will be reported to the relevant manufacturer.

1.5. There are a number of installations accredited to both the RO and the RHI. Sharing information internally between these two schemes will allow us to compare data to check it is being submitted consistently, and that Ofgem is acting consistently in its treatment of the installations.

1.6. In time other areas may be identified where it may be desirable to share information with other bodies in order to reduce fraud and improve the quality of RHI applications and installations.

1.7. This procedure describes how such information is to be shared.

### 2. Overview/description of procedure

2.1. This procedure is designed to cover each, currently envisaged, scenario which could arise whilst dealing with RHI data where there would be justifiable benefits from sharing the data, both internally and externally.

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**Comment [Lindsay1]:** Can't it be princip based?  
**Comment [MD2]:** Don't understand?

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2.2. This process should be used for each incidence of sharing RHI data.

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**3. Procedure details**

**IRMA Authors**

3.1. The RHI Operations Team has put together an IRMA author watch list for providers whose reports have been found to be of a poor quality. This highlights IRMAs which cannot not be 'relied upon'. However, given the lack of reliability with IRMAs generally, our procedures do not currently assume reliance on comments provided within any IRMA.

**Comment [Lindsay3]:** That will cost them hundreds of pounds, and then we are liable for a claim from them and /or the author for that money. If we are to do that, we need a rigorous review process and quality scoring method (think interview process), which nicely slows u down...

3.2. Adding an IRMA author to the watch list may be a trigger for site audit selection. In addition the watch list is consulted if, as part of an escalated review/topic specialist input, the opinion of the IRMA author is being taken into account. In these cases reliance on evidence from a report authored by someone on the Watch List is weighted appropriately.

**Comment [MD4]:** Fair enough, the delete bit below was in there because it was in Jacqueline's November data sharing page so I assumed it was describing current practice...

3.3. In the future we expect that bodies who offer training and assessment of IRMA authors will be in place. At that point we intend to share information about the authors of any sub standard reports with them. This will allow them to either improve their training programmes and / or re assess the author concerned. Link to be added to template IRMA author letter at that point.

**Deleted:** When an author is added to the list we will write to the applicant or participant to inform them that they will need to provide an alternative report, preferably written by a different author. We will copy the relevant IRMA author i this correspondence. Link to be added to template IRMA author letter

**Installers**

3.4. Where Ofgem finds errors in MCS certificates provided by RHI applicants these will be reported to the MCS so the certification bodies can take remedial action. Link to be added to template installer letter

**Comment [Lindsay5]:** Do we await a cert before accrediting?

3.5. Where an installer does not belong to any supervisory body, for example for installations above 45kW, there is a requirement that the work be notified to the Local Authority Building Control officer. Where Ofgem discovers these instances it will notify the relevant Local Authority Building Control officer. Link to be added to template Local Authority letter

**Comment [MD6]:** As above I thought th was current practice...

**Manufacturers**

3.6. The RHI Register contains the make, capacity and model of equipment which forms part of RHI accredited installations. The RHI Operations Team currently maintains a list of some of these, and will develop it into a full list. This list will be published on the RHI website to give a useful indicator that this equipment (when correctly installed) can form part of RHI accredited installations. The published list will be updated monthly with any changes. Link to be added to make and model list

**Comment [Lindsay7]:** Better let them know, they may be ill equipped to deal with the work...

**Comment [MD8]:** That should be easy enough as our responsibility is only to inform, not to make them actually do anything, the bigger issue (as with all of this) will be Legal being happy that we share the data...

**Deleted:** RHI Operations Team maintain list of

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3.7. The Team have also identified that certain boilers perform badly and this will be reported to the relevant manufacturer. Link to be added to template manufacturer letter

**Internal**

3.8. For installations accredited to both the RO and the RHI we will share information on particularly fuel measurement & sampling (FMS) and sustainability. This will include accreditation information, information contained in the FMS questionnaire, periodic data, audit outcomes and correspondence. Sharing information internally between these two schemes will allow us to compare data to check it is being submitted consistently by the participant and being treated consistently by Ofgem.

**Comment [MD9]:** To be updated once we have heard from Legal on the current RHI sharing query.

3.9. Our point of contact with the RO team is Amy Ling.

**Comment [MD10]:** tbc

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#### 4. Areas of responsibility

4.1. All data sharing described in this procedure must comply with all applicable data protection and defamation laws. These include the Data Protection Act, section 105 of the Utilities Act 2000, and Article 8 of the European Convention on Human Rights.

4.2. In order to ensure continued compliance with the relevant legislation, and to guard against the risk of a challenge to any data sharing, staff must take great care to follow the procedures outlined in this document and to use the relevant template document when sharing data. To assist with this only the following trained staff can work on data sharing activities and this must be authorised by an RHI Senior Manager. This is to ensure that no one person is able to independently share data. *List of staff to be added.*

**Comment [MD11]:** We would need train to be set up for the staff who would actually be doing the sharing. We would need input from Legal and Paul Kitcher this.

#### 5. Advice and Guidance

5.1. For any guidance on this document, please contact Morag Drummond *More staff to be added.*

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**Appendix - Related policies and further information**

*Various templates to be added*

