



The Caravan Holiday Home Structural Thermal Rating Scheme

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The Residential Park Home Energy Efficiency Rating Scheme

POLICY DOCUMENT

1 General Requirements

NCC members producing Residential Park Homes and Caravan Holiday Homes will be required to provide energy efficiency/structural thermal ratings for all new homes produced after 1st January 2016. The NCC schemes will run alongside the existing NCC Product Approval Schemes.

To participate in either scheme each manufacturer will be required to appoint at least two assessors to enter data and take responsibility for ensuring that accurate calculations are submitted to the NCC. Only approved assessors may submit calculations. The NCC will assist with training and approving assessors through regular seminars and technical bulletins, and will keep a register of assessors.

Each manufacturer will be audited at least once per annum by the NCC to ensure that this policy is being adhered to and that calculation processes are being followed correctly (see the sections: '*The NCC Auditing Process*' and '*The NCC Policing Policy*' for further details).

2 The Caravan Holiday Home Structural Thermal Rating (STR) Scheme

2.1 Caravan Holiday Homes – Standard Models

A standard model is defined as one which has a specific floor area, occupancy level and outer shell fabric specification. Any variation in floor area, outer shell fabric specification, or occupancy shall be regarded as a separate model.

The calculator will assume (using default settings) that the home has gas central heating, an electric fire in the main habitation area, and a 50/50 split of low/high energy lighting. This means that the ratings will only compare the thermal efficiency of the envelope of the home, and will ignore the efficiency of the energy conversion processes.

Ratings are required for each standard model produced by a manufacturer, and this rating provides a baseline for all variants based on the standard model. The rating for the standard model may then be applied to any home which has the same floor area, occupancy level and outer shell fabric specification as the standard home.

2.2 Caravan Holiday Homes - Variants to Standard Models

Any deviation from the standard model specification, such as door/window areas, types of glazing, types of insulation, types of cladding, ventilation configuration, etc. shall be classed as a variant.

If the thermal rating improves or remain unchanged as a result of changes in specification then there is no obligation for the manufacturer to submit a new calculation for the variant to the NCC.

Alternatively, each variant with improved performance may display its own label reflecting the actual improved performance of that home. In this case the assessor shall submit a revised calculation to the NCC.

If the thermal rating for a variant is lower than the standard model upon which it was based then a new rating label must be produced showing the rating for that variant. The manufacturer may not display a rating label for the standard model on a home which has an inferior rating in comparison to the standard model.

The rating label for all variants shall indicate the relationship to the standard model upon which it is based together with information which shows the variation (e.g. additional floor insulation, etc.).

3 Residential Park Homes – All Models

An individual rating label is required for each home. The rating label shall indicate the specific serial number of the home it relates to.

4 The Process for Submitting a Calculation (for both schemes)

A rating calculation shall be submitted using the version of the calculator which is current at the time the home is manufactured. Assessors can use the link within the calculator to verify that the correct version is being used.

Any rating labels which do not show the version number of the calculator are not valid and shall not be displayed.

In order to enable a rating label to be printed, the calculation must first be submitted to the NCC using the "Upload Calculation" control within the calculator. Once the calculation has been uploaded, an A4 size rating label can be printed locally using the "Print Label" control. The purpose of uploading calculations to the NCC is to allow for archiving and auditing of calculations, and to aid in the development of the calculator.

The "Upload Calculation" control will submit the latest saved version of the calculation with a unique filename. A local copy of that file will be saved onto the assessor's PC. However, manufacturers can also save a copy of the file with their own filename if required, using the "Save" control in the calculator.

Where a material is being used which is not included within the calculator's drop-down lists, the home manufacturer shall submit the material data sheets to the NCC Technical Team. Following verification, the product may then be made available within the relevant drop-down list unless the manufacturer specifically states that they wish to keep the specification of the particular material confidential.

A rating label must be clearly displayed in one of the front windows on each finished home using a clear wallet (details available from the NCC Technical Services team). Manufacturers shall instruct their distributors/parks that rating labels must remain with the home until it is sold, and as far as practicable ensure that this happens. A copy of the label shall also be included in the document pack for the home.

Note: Further information on entering data and submitting calculations can be found in the guidance notes issued with each revised version of the calculator.

5 The NCC Auditing Process

Audits will be carried out with each manufacturer at least once annually by the NCC to ensure that policies are being adhered to and calculation processes are being followed correctly. This process will be augmented with periodic surveillance checks.

As well as physical checks of the homes in production, an annual audit or surveillance check may also include a review of the manufacturer's technical construction file, bills of material, training records, etc.

The auditor will check for evidence that:

- The calculations submitted to the NCC match those for any products in production.
- The manufacturer's design instructions to their manufacturing department match those detailed in the submitted calculations.
- The manufacturer's purchasing department have bought the materials detailed in the design instructions/submitted calculations.
- Homes are being manufactured in accordance with the design instructions/submitted calculations.

6 The NCC Policing Policy

Significant non-conformances and shortcomings revealed during auditing, which lead to an unwarranted improvement in the rating for a home, will be dealt with by way of the PAS risk assessment process and will result in additional surveillance checks.

In cases where non-conformances and shortcomings do not improve the rating for the home, the auditor may record an observation and the manufacturer will be required to amend the relevant calculation(s). Where appropriate the NCC may also require the appointed assessor to undergo further training. Continued errors of a similar nature may result in a risk assessment being required and will result in additional surveillance checks. In severe cases the assessor may also be removed from the list of approved assessors until further training has been undertaken and competence has been verified.

A manufacturer shall provide follow up evidence that significant non-conformances have been rectified for all similar homes in manufacture, as well as any unsold stock at distributors/parks.

If it is suspected that a manufacturer has deliberately set out to mislead the NCC and the other scheme stakeholders, then this may call into question their membership of the scheme. Any manufacturer found to be bringing the scheme into disrepute will be dealt with under the broader NCC disciplinary process.

Costs related to the Schemes

The annual audit and surveillance audit visits will be charged at £220.00* per half day or part thereof. In order to minimise costs to participating manufacturers and reduce auditor travelling time, these audits will coincide with visits required by the Product Approval inspections whenever possible.

CHH Type	Calculation Required?	Serial Number on EES Rating Label	NCC Approve Calculation
Standard Model	Yes	No 'Standard Model' displayed under product description	Reviewed as part of annual audit
Variant - better than standard	Optional	May display "Standard Model + list of fitted options" or Serial number under product description	Reviewed as part of surveillance checks or annual audit
Variant – worse than standard	Yes	May display "Standard Model + deviations" or home serial number under product description	Reviewed as part of surveillance checks or annual audit

RPH Type	Calculation Required?	Serial Number on EES Rating Label	NCC Approve Calculation
All models	Yes	Yes	Reviewed as part of surveillance checks, or annual audit

Annual Audits

During an annual audit the auditor will request evidence for homes in production, as well as records for completed homes. The manufacturer shall provide all necessary evidence to allow the auditor to complete the verification of the energy rating calculations. Delays will extend the overall time needed for the audit and potentially increase the cost.

The time required to complete the annual audit will vary depending upon the availability of the relevant documentation and the significance of any non-conformances/shortcomings found. It is envisaged that most audit visits will take around 4 hours. If issues are found that require further investigation then extra time may be required to complete the audit. This again has the potential to increase the time taken to complete the audit and therefore the cost of carrying out the audit.

Surveillance Checks

Where additional surveillance checks are required for the reasons outlined in the section: '*The NCC Policing Policy*', these will be charged at the standard rates detailed above.

The time taken and hence the cost of a surveillance check will vary depending upon the availability of the relevant documentation and the significance of any non-conformances/shortcomings.

It is essential that the manufacturer provides all necessary supporting documentation when requested, to allow the surveillance check to be completed. The auditor will request evidence for homes on the production line, as well as records for completed homes.

If non-conformances/shortcomings are found that require further investigation then extra time may be required to complete the surveillance check. This may incur additional charges.

General

Any queries should be referred to the NCC using the email address: energy.rating@thencc.org.uk

*Costs correct at the time of publication, but subject to change. All prices are quoted excluding VAT.