The MCS Contractor Standard

Part 2: The Certification Process
This Standard was prepared by the MCS Working Group 11.

It is published by The MCS Service Company Ltd on behalf of the MCS Charitable Foundation.

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- A Certification Body offering certification services in accordance with this document

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ABOUT MCS

Giving you confidence in home-grown energy

With energy costs constantly rising and climate change affecting us all, low-carbon technology has a bigger and bigger role to play in the future of UK energy.

We’re here to ensure it’s a positive one.

Working with industry we define, maintain and improve quality – certifying products and installers so people can have confidence in the low-carbon technology they invest in. From solar and wind, to heat pumps, biomass and battery storage, we want to inspire a new generation of home-grown energy, fit for the needs of every UK home and community.

About

The Microgeneration Certification Scheme Service Company Ltd (MCSSCo Ltd) trades as MCS and is wholly owned by the non-profit MCS Charitable Foundation. Since 2007, MCS has become the recognised Standard for UK products and their installation in the small-scale renewables sector.

We create and maintain standards that allow for the certification of products, installers and their installations. Associated with these standards is the certification scheme, run on behalf of MCS by Certification Bodies who hold UKAS accreditation to ISO 17065.

MCS certifies low-carbon products and installations used to produce electricity and heat from renewable sources. It is a mark of quality. Membership of MCS demonstrates adherence to these recognised industry standards, highlighting quality, competency and compliance.

Vision

To see MCS certified products and installations in every UK home and community.

Mission

To give people confidence in low-carbon energy technology by defining, maintaining and improving quality.

Values

1. We are expert – ensuring quality through robust technical knowledge
2. We are inspiring – helping to reshape energy in UK homes and communities
3. We are collaborative – working with industry and government to create positive change
4. We are principled – operating in a way that’s clear, open and fair
5. We are determined – supporting the UK’s drive towards a clean energy future
CHANGES TO STANDARDS

When MCS Standards are revised, the issue number is also revised to indicate the nature of the changes. This can either be a whole new issue or an amendment to the current issue. Details will be posted on the website at www.mcscertified.com.

Technical or other significant changes which affect the requirements for the approval or certification of the product or service will result in a new issue. Minor or administrative changes (e.g. corrections of spelling and typographical errors, changes to address and copyright details, the addition of notes for clarification etc.) may be made as amendments.

The issue number is given on the left of the decimal point, and the amendment number on the right. For example, issue 3.2 indicates that it is the third significant version of the document which has had two sets of minor amendments.

Users of this Standard should ensure that they are using the latest issue.

<table>
<thead>
<tr>
<th>Issue No.</th>
<th>Amendment Details</th>
<th>Date</th>
</tr>
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<tr>
<td>1.0</td>
<td>First Publication</td>
<td></td>
</tr>
<tr>
<td>2.0</td>
<td>Standard re-ordered to aid understanding. Enhanced requirements around contracting and sales activities</td>
<td>01/12/2011</td>
</tr>
<tr>
<td>3.0</td>
<td>Updates to Clauses 2.1, 2.2, 3.0, 10 sections 2: MCS Contractor Responsibilities, 7: Software Control, 10: Subcontracting, 12: Control of work in progress, 15: Records, 16: Complaints, 17: Training and Competence.</td>
<td>16/12/2016</td>
</tr>
<tr>
<td>4.0</td>
<td>Significant update to allow for more risk-based auditing and target focus to site visits.</td>
<td>22/06/2020</td>
</tr>
<tr>
<td>4.1</td>
<td>Minor amendment regarding implementation.</td>
<td>16/07/2020</td>
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FOREWORD

This document contains references to other documents which may be either normative or informative. At the time of publication any editions of those documents, where indicated, were valid. However, as all documents are subject to revision, any users of this document should apply the most recent editions of those referenced documents.

This issue 4.1 is a minor update to issue 4.0 published on 22/06/2020. MCS Contractors certified in accordance with MCS 001 may start working in accordance with this update from the date of publication. Compliance with the requirements in this update is mandatory for MCS Contractors from the date of implementation (22/06/2021) except clause 4.4.1. Membership of any relevant CTSI approved Consumer Code will remain compliant until 31/3/2023. Compliance with clause 4.4.1 (membership of RECC) becomes mandatory from 1/04/2023.

This Standard is published in two parts, MCS 001-1 describes the requirements that MCS Contractors shall satisfy at an organisational level and MCS 001-2 describes the process that Accredited Certification Bodies must follow to ensure the compliance of MCS Contractors with the Scheme requirements. Both parts of this Standard, read together, constitute MCS 001 and should be viewed as a single Standard. Certification must not be awarded against a single part of this Standard, but against MCS 001 in its entirety and hence certification documentation must refer either to “MCS 001” or to “MCS 001-1 and MCS 001-2”.

The diagram below shows the relationship between this document and others published by MCS.
1 INTRODUCTION

This Certification Scheme provides an ongoing, independent, third party Compliance Assessment of MCS Contractors and the microgeneration technologies that they install to ensure that the requirements of the appropriate standards are met and maintained. The procedural and system requirements to be met by MCS Contractors is described in MCS 001-1, while the certification process is detailed below.

2 SCOPE

The scope of this Scheme covers the requirements for MCS Contractors undertaking the supply, design, installation, set to work, commissioning and handover of the following microgeneration technologies:

- Solar Heating
- Solar PV
- Micro Wind
- Biomass
- Heat Pumps
- Micro Cogeneration (includes heat-led and electricity-led systems)
- Electrical Energy (Battery) Storage Systems

This Scheme is open to any contractors undertaking the above.
## 3 DEFINITIONS

The definitions given here are used within this Standard. Definitions for each of the Scheme technical Standards are given in the appendix of MCS001-1.

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accredited Certification Body</td>
<td>A body that is accredited in accordance with ISO / IEC 17065 conformity assessment by UKAS or an equivalent (i.e. a member of the International Accreditation Forum (IAF) Multilateral Recognition Arrangement (MLA)) and undertakes the Compliance Assessment of MCS Contractors against the requirements of this Scheme.</td>
</tr>
<tr>
<td>Customer</td>
<td>The end-user for whom the microgeneration installation will be carried out. In consumer contracts this may be the householder or property owner (e.g. a social or private landlord).</td>
</tr>
<tr>
<td>Compliance Assessment</td>
<td>The evaluation by an Accredited Certification Body which demonstrates the MCS Contractor complies with the requirements of this and the relevant MCS Installation Standards.</td>
</tr>
<tr>
<td>MCS Contractor</td>
<td>An organisation that is responsible for all of the following activities: supply, design, installation, set to work, commissioning and handover of microgeneration systems and technologies. An MCS Contractor will either employ, or engage as subcontractors, installers.</td>
</tr>
<tr>
<td>Nominee</td>
<td>The Nominee as defined in MCS 025.</td>
</tr>
<tr>
<td>Nominated Technical Person</td>
<td>The Nominated Technical Person(s) (NTP) as defined in MCS 025.</td>
</tr>
</tbody>
</table>
4 APPLICATION PROCESS

4.1. INITIAL CERTIFICATION

4.1.1. Applications for certification should be made to an Accredited Certification Body operating this Scheme, who will provide the appropriate application form and details of the applicable fees. Applicants may apply for more than one microgeneration technology.

4.1.2. Applications will be subject to review prior to assessment.

4.1.3. Where requested, the Contractor shall provide details of recent or current installations as required by the Accredited Certification Body. The Contractor shall arrange access to installations selected by the Accredited Certification Body.

4.1.4. Assessment for initial certification shall include both office assessment (Clause 5.2) and site assessment covering all technologies applied for (Clause 5.3).

4.2. EXTENSION TO SCOPE

4.2.1. Applications for extension to scope should be made to an Accredited Certification Body operating this Scheme, following their procedures.

4.2.2. Assessment for extension to scope must include a site assessment covering all technologies applied for (Clause 5.3). The office records and systems supporting the extension to scope may be assessed either by remote review or a visit to the MCS Contractor’s office.

4.3. SITE ELIGIBILITY FOR INITIAL CERTIFICATION OR EXTENSION TO SCOPE

For each of the MCS technologies for which certification is being sought, a Contractor may use the following process for one installation per technology only.

a) The Contractor applies to an Accredited Certification Body for certification under MCS.

b) Compliance Assessment of the Contractor is undertaken by the Accredited Certification Body and includes assessment of an installation for which the Contractor has been fully responsible and has commissioned in accordance with the applicable MCS Installation Standard.

c) At this stage the Contractor is not MCS certificated for that technology. The Contractor proposes corrective actions for any non-conformities raised by the Accredited Certification Body.

d) The Accredited Certification Body assesses the corrective actions that have been implemented and, once fully satisfied that the relevant requirements of MCS have been met, certifies the Contractor.
e) The MCS Contractor then re-commissions the installation used for this Compliance Assessment, and issues a new commissioning certificate.

f) The MCS Contractor registers the installation on the MCS Installation Database (MID) and generates an MCS certificate which must use the date of re-commissioning.

5 COMPLIANCE ASSESSMENT

5.1. GENERAL

5.1.1. The MCS Contractor, Nominee and Nominated Technical Person (NTP) must be present or available throughout the Compliance Assessment process.

5.1.2. A Compliance Assessment is an objective examination of an MCS Contractor and the microgeneration work they have conducted, or intend to conduct, to determine compliance with the Scheme and the relevant standards(s). Compliance Assessments are conducted using elements of questioning and observation techniques. Compliance Assessments start with an opening meeting to explain the purpose of the visit, the work that is to be assessed, the reporting method, the selection of the installation site(s) to be visited, and the approximate time, place and purpose of a closing meeting.

5.1.3. At the end of a Compliance Assessment or a surveillance visit, a closing meeting is held to discuss any non-conformity or observation reports raised and the Assessor’s recommendation.

5.1.4. If the Compliance Assessment demonstrates compliance that is limited to a specific product type(s), the Assessor may recommend certification that is limited in its scope.

5.1.5. Where non-conformity reports are raised, they must be completed and returned to the Accredited Certification Body with completed corrective and preventative actions within 4 weeks of a Compliance Assessment or surveillance visit.

5.1.6. The Accredited Certification Body shall verify the adequacy of the actions taken in response to non-conformity reports and may require additional information and action to be taken by the MCS Contractor before accepting them.

5.1.7. Where non-conformities cannot be resolved within 6 weeks of the original visit date, certification of the Contractor may be suspended or withdrawn.

5.1.8. Where certification cannot be recommended at an initial Compliance Assessment visit, a Compliance Re-assessment will be considered and may be required at additional cost.

5.2. OFFICE COMPLIANCE ASSESSMENT

5.2.1. This is a Compliance Assessment of the management systems that the MCS Contractor has in place to satisfy the appropriate MCS Scheme requirements; in particular the
requirements in Section 4 of MCS 001-1 (hereafter abbreviated to “Section 4”). The Assessor shall also check the following:

a) That the details on the application form or certificate(s) are correct.
b) That actions to resolve any previous non-conformities have been satisfactorily completed (if a surveillance assessment).
c) That no changes have occurred that should have been notified to the Accredited Certification Body (see Clause 10).
d) The correct use of the MCS Certification Mark (see Clause 8).

5.2.2. This includes the contract review, design, installation, set to work, commissioning and handover of the appropriate microgeneration system and technology.

5.2.3. Design is defined as the formulation of a written plan including a specific list of products and fixings to form a completed system for a defined microgeneration technology. It includes extensions and alterations to existing microgeneration systems.

5.2.4. All systems must be designed in accordance with the requirements set out in the appropriate MCS Installation Standards.

5.2.5. Where MCS Contractors do not engage in the design of microgeneration systems, but work solely for a client who has already formally agreed a system design, then the MCS Contractor must be competent to review and verify that the design would satisfy the design requirements set out in the appropriate MCS Installation Standards.

5.3. **ON SITE COMPLIANCE ASSESSMENT**

5.3.1. This is a Compliance Assessment of an installation to review the work that has been undertaken against the system design and the procedures for the installation, set to work, commissioning and handover of the system / technology in accordance with the relevant MCS Installation Standards (e.g. MIS 3001).

5.3.2. An Accredited Certification Body may use an installation that is not fully within the scope of the Scheme for the on-site Compliance Assessment, if that installation provides objective Compliance Assessment evidence against specific requirements of the relevant MCS Installation Standards.

5.4. **SURVEILLANCE ASSESSMENT**

5.4.1. Certification is maintained through at least one annual compliance assessment. This assessment shall be arranged in accordance with Appendix A. Surveillance ensures that the MCS Contractor is continuing to comply with the requirements of the Scheme and is working within the scope of its certification.

5.4.2. Where a surveillance programme is via the minimum annual assessment, this should take place during a time period that is between 2 months prior to and 4 months beyond the original date of certification.
5.4.3. Where the MCS Contractor uses subcontractors who are not themselves certified MCS Contractors, the Accredited Certification Body shall audit the verification process used by the MCS Contractor to ensure compliance with MCS 001-1 Clause 4.11. The extent of assessment shall take account of the number of subcontractors and the range of work undertaken by them.

*Note: As a guide, the number of sites assessed should not be less than the square root of the number of subcontractors for any particular technology, rounded up to the nearest whole number.*

5.4.4. Additional surveillance assessments may be required, the costs of which shall be borne by the MCS Contractor, in the event of any of the following:

a) Substantiated complaints against the MCS Contractor are received

b) As a result of a significant number of non-conformities being raised during an assessment (in this circumstance an additional assessment may be required within 6 weeks of the original visit date)

c) A change occurs within the organisation as specified in Clause 10

5.4.5. A surveillance assessment of the MCS Contractor’s management systems to satisfy Section 4 can be undertaken using either of the following two approaches:

a) An assessment undertaken during a physical visit to the Contractor’s trading address in accordance with Clause 5.2 or

b) An assessment undertaken remotely via the submission and review of a formal annual return in accordance with Clause 5.5.

5.4.6. Where an MCS Contractor operates from multiple offices then each office shall be subject to an assessment visit within a 3-year period.

5.4.7. The Accredited Certification Body shall ensure that prior to and/or during the on-site assessment, records are available relating to the installation in terms of contractual documents, design, competence of the installation team, calibrated equipment used, risk assessment etc.

5.4.8. Installation work shall be verified by on-site assessment in accordance with Clause 5.3 unless it can be demonstrated that no installations have been carried out during the previous 12 months, in which case a desktop capability assessment shall be carried out in accordance with Clause 5.4.9.

5.4.9. If the MCS Contractor has not carried out installation work for a particular technology during the previous year, the surveillance may proceed on the basis of a desktop review of capability at the MCS Contractor’s office, subject to the MCS Contractor agreeing to inform the Accredited Certification Body the next time they accept a contract to carry
out an installation of the type concerned. When such an installation goes ahead, an additional site Compliance Assessment shall be required.

5.4.10. A desktop review shall not be undertaken for more than one consecutive surveillance. Where the MCS Contractor has not carried out installation work for a particular technology for 2 consecutive years then certification shall be terminated and only re-instated as if Initial Certification (clause 4.1).

5.5. REMOTE SURVEILLANCE ASSESSMENT OF SECTION 4

5.5.1. Assessment of the MCS Contractor’s management systems to satisfy Section 4 can be undertaken remotely (Clause 5.4.5 option (b)) for up to 2 out of every 3 years. At least every third year an assessment shall be undertaken during a physical visit to the Contractor’s trading address (Clause 5.4.5 option (a)).

5.5.2. Where the MCS Contractor is also certified to ISO 9001 by a Certification Body accredited to certify against that standard by UKAS, then assessment of the MCS Contractor’s management systems can be undertaken remotely for up to 4 out of every 5 years.

5.5.3. The option for assessment to be undertaken remotely shall be at the sole discretion of the Accredited Certification Body and only where all of the following conditions are met:

a) The MCS Contractor is not running complex management systems to satisfy Section 4 such as would be the case with larger organisations, wide geographic coverage or significant use of subcontractors as described in Clause 5.4.3.

b) There is evidence from an earlier assessment that the MCS Contractor’s management systems are operating effectively.

c) There have been no significant changes in the organisation of the MCS Contractor.

d) There have been no complaints resulting in non-conformities relating to the MCS Contractor’s management systems.

e) There are no unresolved non-conformities.

f) There have been no significant changes to Section 4.

g) The MCS Contractor agrees to remote assessment.

h) No major non-conformities are found during the on-site assessment.

5.5.4. Where this approach is adopted, the Accredited Certification Body shall obtain or gain remote access to at least the information listed in Table 1 from the MCS Contractor. The Accredited Certification Body may request any additional information it deems necessary to carry out an effective assessment.
Table 1: Minimum Information Required for the Annual Return

<table>
<thead>
<tr>
<th>Information to be Submitted</th>
<th>MCS001-01 Clause(s) Tested</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify the current format of the QMS and, if in the form of a Quality Manual the current issue/date.</td>
<td>4.1</td>
</tr>
<tr>
<td>Verification of the trading address of the MCS Contractor by checks such as Companies House, Credit Checks, address portion of recent bank statement, utility bill etc.</td>
<td>4.3</td>
</tr>
<tr>
<td>Membership of the Renewable Energy Consumer Code (RECC) and how sales are obtained. Where sales or leads are provided by third-parties, details of how the MCS Contractor ensures such parties comply with the terms of the Consumer Code (e.g. provide copies of contracts with those third-parties detailing the terms of the arrangement).</td>
<td>4.4</td>
</tr>
<tr>
<td>Verify the key individuals within the business and any changes to key staff.</td>
<td>4.5</td>
</tr>
<tr>
<td>Identify the number of installations completed in the year and provide details of how customer requirements are managed.</td>
<td>4.9</td>
</tr>
<tr>
<td>Contractual documents (quote, contract, performance calculation, evidence of Building Regulations Compliance Certification) should be supplied for the site(s) to be inspected, and sites where complaints have been raised. Additional jobs should be identified by the CB to view 1% (up to a maximum of 100 jobs in any year) of contractual documentation.</td>
<td>4.10</td>
</tr>
<tr>
<td>The number of subcontractors being used and the range of work undertaken by them. Copies of subcontract agreements should be provided.</td>
<td>4.11</td>
</tr>
<tr>
<td>Provide a copy of the log of complaints received</td>
<td>4.16</td>
</tr>
<tr>
<td>Current ISO 9001 certificate (if relevant)</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Note: The provision of the information listed above demonstrates that records are being retained in accordance with Clause 4.15.

5.5.5. The Accredited Certification Body shall review the information provided and where necessary shall ask for supplementary information. The Accredited Certification Body shall identify any non-conformities and set appropriate improvement actions, and if a number of areas are subject to non-conformity or significant change the Accredited Certification Body shall conduct a physical audit at the MCS Contractors trading address.

6 CERTIFICATION AND LISTING

6.1. Certificates are awarded to Contractors when all Compliance Assessment activities have been satisfactorily completed, the Assessor has recommended that certification is granted, any non-conformities raised during Compliance Assessment are cleared and the
Accredited Certification Body has formally reached a certification decision in accordance with its procedures.

6.2. Certificates contain the name and address of the MCS Contractor, the microgeneration technology(s) that have been assessed, any limitations on the scope of the certification, a unique certificate reference number and the issue number and date.

6.3. Certificates are maintained and held in force subject to satisfactory completion of the requirements for maintenance of certification (see Clause 8) but remain the property of the Accredited Certification Body.

6.4. Details of the successful MCS Contractor are listed on the website at: www.mcscertified.com.

7 MAINTENANCE OF CERTIFICATION

7.1. CONTINUED ACTIVITY AND COMPLIANCE

An MCS Contractor shall be eligible to remain certificated provided it continues to be engaged in microgeneration installation work for the scope indicated on the certificate and continues to comply with the relevant MCS Standards. Certificates are valid from the date of issue and are maintained and held in force subject to satisfactory surveillance Compliance Assessments but remain the property of the Accredited Certification Body.

7.2. NON-CONFORMITIES ARISING OUTSIDE SURVEILLANCE ACTIVITIES

7.2.1. In the event that a non-conformity is raised by the Accredited Certification Body based on evidence obtained in circumstances other than surveillance activities (e.g. from complaints or third-party feedback), the MCS Contractor will be required to resolve them in a timescale defined by the Certification Body, not normally more than 6 weeks from the date raised with the MCS Contractor.

7.2.2. Where such non-conformities cannot be resolved within 6 weeks the MCS certification would be subject to additional surveillance activities (remote, office audit or site visit as appropriate), suspension or withdrawal.

7.2.3. Where a complaint is upheld by virtue of non-conformities being identified, even if resolved, the Accredited Certification Body shall conduct additional surveillance activities covering either the QMS, other installation work (i.e. different to that resulting in the complaint), or both depending on the nature of the non-conformities identified.

8 CERTIFICATION MARK

8.1. The MCS Contractor shall use the Certification Mark(s) only in accordance with their Accredited Certification Body’s’ instructions.
8.2. An example of the Certification Mark that can be used for this Scheme is as follows:

![Certification Mark Image]

*Certificate Number 'xxxx'*
**Technology**

* Where 'xxxx' is the certificate number

** Add the appropriate technology(s) which appear(s) on your certificate. Examples of wording to be used: Solar Thermal Systems, Photovoltaic Systems, Micro and Small Wind systems, Heat Pumps, Biomass, Fuel Cells, Combined Heat and Power (CHP) Systems, Battery Storage Systems

9. COMPLAINTS AND APPEALS

9.1. An assessed MCS Contractor may make a formal complaint to the Accredited Certification Body provided it relates to certification activities for which it is responsible. The Accredited Certification Body shall handle such complaints in accordance with its published Complaints Procedure which shall comply with the requirements of ISO/IEC 17065.

9.2. An assessed MCS Contractor may appeal against any decision of the Accredited Certification Body in respect of its certification. Decisions that can be appealed are: refusal to grant certification; reduction in the scope of certification; suspension of certification pending remedial action; withdrawal of certification.

9.3. Any appeal shall be made in writing, setting out clearly the grounds for such an appeal. Such an appeal shall be served on the Accredited Certification Body within 3 weeks of the date of notification of the decision being questioned. Any such appeal will be dealt with under the procedures published by the Accredited Certification Body, which shall be made available to the assessed MCS Contractor.

9.4. Complaints and appeals shall not be used to unduly hinder, delay or avoid remedial action where non-conformities have been identified as a result of assessments, complaints or other evidence. Where the safety and/or welfare of a consumer is directly impacted by the subject of the complaint or appeal the Accredited Certification Body shall prioritise that case and the MCS Contractor shall consider reasonable actions they could take to ensure the safety and/or welfare of the consumer while the complaint or appeal is in progress.
10 CHANGE OF DETAILS

10.1. The MCS Contractor shall give notice in writing to the Accredited Certification Body of any change to any significant particulars. These include but are not limited to:

   a) Legal constitution
   b) Director(s)
   c) Trading status, title or address
   d) Nominee
   e) Nominated Technical Person(s)

10.2. Such notice shall be given to the Accredited Certification Body within 30 days of any change becoming effective.

10.3. Where the changes are such that the conditions under which certification was granted are significantly affected, the MCS Contractor will be advised of the actions, and any associated fees, that will be required to be completed to maintain certification.

11 THE CERTIFICATION PROCESS

12 ADDITIONAL INFORMATION

Please note that all details of applicants and certificate holders may be shared by the Certification Body with:

- MCS Service Company Ltd
- Renewable Energy Consumer Code and any other Chartered Trading Standards Institute (CTSI) ‘code of conduct’ for the purposes of complaints handling and for compiling statistics on this Scheme
- UK government departments and their agencies
APPENDIX A

1 SCOPE

This Appendix sets out the process for MCS Contractor Certification Bodies selecting the installation for annual surveillance for each technology that the MCS Contractor is certified for.

2 PROCESS

2.1 Where the MCS Contractor has completed more than five installations in total:

   a) The Accredited Certification Body uses the MCS Installation Database (MID) to select at least five installations at random that were normally commissioned within the last year.
   b) The list of installations is sent to the MCS Contractor and the MCS Contractor is asked to choose one and arrange the site visit with the consumer.
   c) If it is not possible to visit any of the first five selected installations, the Accredited Certification Body will select another five at random and the process will continue from section 2.1 b).
   d) The Accredited Certification Body shall record the reason why the first five selected installations were unavailable. If the MCS Contractor has commissioned less than five installations move to section 2.2.

2.2 Where the MCS Contractor has completed less than five installations in total:

   a) The Accredited Certification Body will choose one at random and ask the MCS Contractor to arrange the site visit for that one.
   b) If it is not possible to visit the first selected installation, the Accredited Certification Body will select one more installation from the MID and ask the MCS Contractor to arrange the site visit.

2.3 Issues arising

   2.3.1 The Accredited Certification Body shall monitor:

   - When MCS Contractors regularly fail to cooperate with the site selection process.
   - How often the MCS Contractor changes the site to be visited on the day of the surveillance visit.

   2.3.2 In the event that site selection is continually problematic, the Accredited Certification Body shall consider sanctions against the MCS Contractor.

NOTE: The Accredited Certification Body retains the right to select a specific site to be visited for other reasons such as a complaint investigation.