Bat Earned Recognition Beta Monitoring and Evaluation Report

Assessment and Accreditation and Licensing

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Executive summary

Launched in March 2021, the Bat Earned Recognition Pilot ('the Pilot') was developed in partnership between Natural England, the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Bat Conservation Trust (BCT) ('the Partners').

The Pilot was designed to test a competency-based assessment and accreditation (A&A) process for bat consultants, and a new streamlined online licensing process, by which the quality of the site registration submission by the ER Consultant is assured.

Monitoring and evaluation of the Pilot was carried out to:

- Provide insight into the measures of success, what can be improved and managing risk.
- Provide insight into how well the Pilot met the objectives of wider Natural England strategies and commitments.
- Augment wider lessons learnt, informing projects and reforms in licensing (and potentially beyond).

The Pilot evaluation report and Addendum (evaluating additional site registration data) are available on Natural England's Access to Evidence catalogue.

Based on interim evaluation, in June 2022 internal approval was given to move Bat Earned Recognition (BER) to Beta phase ('Beta'), as a step between the Pilot and potential roll-out. This Bat Earned Recognition Beta Monitoring and Evaluation Report – Assessment and Accreditation and Licensing, which is predominantly aimed at the Partners, Defra, the Beta Assessors and Moderator, applicant bat consultants, Natural England licensing reform teams and the Bat Expert Panel, delivers an evaluation of Beta.

As with the Pilot, the success of Beta will be determined primarily by the extent to which Beta A&A met its objectives. This determination has predominantly been informed by answering five Evaluation Questions (EQ) (the same questions that were used in the Pilot), which also form the measures of success:

EQ 1: Is the process of becoming an Earned Recognition Accredited Bat Consultant accessible, fair and consistent?

Beta Conclusion: As a national licence, Beta evaluation data continues to indicate that BER is accessible to all bat consultants and, overall, it is considered a fair system.

EQ2: To what extent has Beta shown potential for BER to streamline the bat mitigation licensing process?

Beta Conclusion: Although BER casework processing time is just slightly less than for BMCL, which is a low impact licence only, the improvements made for Beta continued to demonstrate considerable streamlining over both Low-risk and High-risk Bat EPS-MIT casework processing time.

EQ3: To what extent has Beta shown potential for BER to raise and maintain professional standards?

Beta Conclusion: There is not yet enough data available to evidence an improvement in standards. However, informal feedback and initial data shows that the BER approach does have significant potential to raise and maintain professional standards.

EQ4: To what extent has Beta shown potential for BER to improve outcomes for bats?

Beta Conclusion: Insufficient data over the timeframe of Beta, but significant potential for improvements due to better practices as a result of raising standards, improved 'PR' for bats, and for more effective longer-term monitoring.

EQ5: To what extent can BER be deemed scalable, sustainable, and possible to be maintained at a National Level?

Beta Conclusion: Indications are that with suitable adjustment, BER can be a scaled up for roll out as a sustainable approach, and BER has been approved for roll out to business as usual.

While it is difficult to definitively evidence all the objectives within the timeframe of the scheme, evaluation concludes that all of the objectives have been met by Beta, or are likely to be met by roll out of BER.

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1 Introduction

1.1 Context

The Bat Earned Recognition Pilot was developed by the Partners to test both a competency-based assessment and accreditation process for bat consultants and a new streamlined online licensing process, by which the quality of the site registration (SR) submission by the Earned Recognition Accredited Bat Consultant (ER Consultant) is assured. Monitoring and evaluation was carried out iteratively throughout Beta, with a view to informing a decision on whether this form of Earned Recognition (ER) should become the preferred, mainstream, licensing system for bats. Based on the interim evaluation, internal approval was given to move BER to Beta, as a step between the Pilot and roll-out.

The conclusions of the Pilot evaluation showed that all the objectives of the Pilot were met or were likely to be met by roll out with further improvements to the A&A processes. The success of those improvements, implemented for Beta, are evaluated in this report.

1.2 Scope and phasing of Beta

The Pilot was instigated as a first step in road testing the BER concept for bat mitigation licences for the purposes of preserving public health or public safety, and imperative reasons of overriding public interest. Other types of licence are currently excluded from BER.

As a step between the Pilot and roll-out, Beta was managed by a dedicated BER Project Team (BER PT), and comprised:

- continuation of the SR process for ER Consultants, and
- reviewing and improving the Assessment and Accreditation, then implementing for a second tranche of bat consultants.

At the time of this Report the A&A for the second tranche of bat consultants is still ongoing hence the small sample size for some of the questionnaires.

Assessment and Accreditation comprised four stages that were undertaken by Candidates in order to assess their competence against a standard framework. If successful, candidates are accredited and registered under the BER Class Licence. The four stages are:

- 1 – Multiple Choice Questions (MCQ)
- 2 – Online Scenario Testing (OST)
- 3 – Portfolio of Evidence
- 4 – Professional Review Interview

It was clear from the Pilot that the assessment of Portfolios was too onerous, and changes were needed to test more Competency Indicators (CIs) in the early stages of Beta A&A (MCQ

and OST) enabling the Portfolio to focus on the evidence requirements. This was known as the 'shift left' approach. The refinements of 'shift left' for Beta, whereby more CIs were tested at MCQ and OST, was a positive step forward, but more work is needed to further streamline the Portfolio stage for roll out.

1.3 Objectives of the Bat Earned Recognition Beta

The following are **objectives** that Beta aimed to directly achieve or otherwise demonstrate are achievable:

1   Streamline the bat licensing process for stakeholders by reducing delays, issuing licences more quickly and improving certainty from the outset.
2   Raise and maintain standards in bat survey and mitigation relating to licensable work to enable delivery of high-quality environmental outcomes and increased accountability, resulting in and ensuring timely and appropriate decisions within licensing to provide better outcomes for bats.
3   Identify the necessary framework and mechanisms required for national roll-out.
4   Reduce the cost of administering the licensing system.
5   Free up resource availability for other organisational priorities, such as compliance monitoring.

1.4 Targets of the Bat Earned Recognition Beta

Delivery of the BER Targets will provide the data allowing robust evaluation to determine whether the BER Objectives have been met, or are achievable after the approach is rolled out.

The **targets** of Beta were:

1   To develop and test the improvements made for the BER Beta approach to prepare for roll out.
2   To train a sufficient number of ER consultants to become additional Assessors to enable accreditation assessments of enough Candidate bat consultants to facilitate Beta.
3   To achieve BER accreditations of sufficient numbers/types of Candidate ER consultants to robustly test the accreditation process.
4   To determine enough streamlined licence applications through Beta to provide sufficient evidence to determine the efficacy of the BER concept and the supporting systems and processes.

1.5 Aims of the evaluation

The broad aims of the Beta evaluation:

- Provide insight into the measures of success, what can be improved and managing risk.
- Provide insight into how well Beta met the objectives of wider Natural England strategies and commitments.

- Augment wider lessons learnt, informing projects and reforms in licensing (and potentially beyond).

To fully understand whether BER meets the Objectives, the evaluation also needed to show that:

- There are successful Assessment, Accreditation and Licensing processes in place.
- There are working and appropriate IT systems that allows bat consultants to successfully submit accreditation applications and site registrations, and
- The IT systems enable Natural England to successfully process accreditation applications and site registrations in a streamlined way.

A successful evaluation will determine whether BER is fit for purpose; and will feed into continuous improvement as BER is rolled out.

1.6 Managing Risk

The High-level risks detailed below were the key risks identified for Beta. The narrative demonstrates how each risk was managed.

Ambitious Timescales & Project Delays

- An ambitious timescale for Beta, and staff changes within BER PT meant that there was limited time to translate issues from Pilot into Beta A&A improvements ready for implementation. Potential reputational impact for Natural England, Government and Partners by not delivering the project to time.
  - ο Workload pressures on BER PT were carefully managed through reviewing the timelines and prioritisation of activities, recruitment of new Team members tight scheduling and project management.
  - ο Ongoing support of the Team from the Partners was critical to achieving milestones, and outsourcing of assessment materials increased capacity.

Natural England Wildlife Licensing Service (NEWLS) Service Standards issues

- The prospect that BER might be undermined by improvements to NEWLS service standards puts the completion of roll-out at risk.
  - ο Demonstrating that BER offers an effective licensing route, and saves time for NEWLS and customers.
  - ο Regular communication with NEWLS colleagues to understand planned changes to service standards, and implications for BER.

Budgets

- During Beta it became apparent that there would be insufficient budget to complete the A&A process with external assessors.
  - ο Assessor timesheets were tracked daily.
  - ο Extra money was secured for completing Beta A&A, and continuing improvement to assessment materials.

Complex IT Systems

- The A&A process uses a Learning Management System, which – for Pilot and Beta - is currently hosted by a Partner. Reliance on a third party's system becomes less appropriate as BER moves from trial phases to ongoing business as usual.
  - Budget has been secured, and procurement is underway, for Natural England's own Learning Management System to use for BER A&A.
- Licensing (through SR) is currently delivered through an interim IT solution, with an improved system being worked upon. Resourcing issues within the team delivering this IT solution, has led to uncertain time scales for the new system.
  - BER PT continue to support the delivery of the new IT system, and work with colleagues to identify appropriate timescales.
  - Join-up across the organisation to identify any issues impacting on the interim solution, to inform the timeframe required for the new IT system.

1.7 Beta Headline Statistics

- 165 bat consultants applied for accreditation under Beta

- 150 new candidates for Beta Assessment

- 27 ER Consultants accredited to date[1]

- 48% response to the Assessment and Accreditation evaluation questionnaires

- 169 site registrations submitted[2]

- 42% response to the site registration evaluation questionnaire

- 81 Compliance checks completed so far[3]

1.8 Theory of Change and Evaluation Questions

For the Pilot, the Partners produced a comprehensive Theory of Change (ToC) logic model to map out how the objectives would be achieved.

[1] At 07/11/ 2023
[2] Date range 03/08/2023 – 07/11/2023
[3] Date range 01/01/2023 – 18/10/2023

The ToC can be viewed in Annex 1 of the [Natural England Report NERR128 Bat Earned Recognition Monitoring and Evaluation Report](#) on Natural England's Access to Evidence catalogue.

1.9 The ToC allowed Partners to identify Evaluation Questions

Evaluation Questions are at the core of any evaluation plan. They guide the collection of data which underpins the assessment of how well a process works, progress against objectives, and the overall value it is providing. Evaluation Questions are designed to help understand why a process has developed as it has; understand potential issues and risks, and possible solutions; explore potential future trajectories; and suggest where future changes may be needed.

Beta has tested the process developed from the Pilot, which is designed to achieve the same set of objectives as for the Pilot. This evaluation seeks to understand how well the evolving process works and identify future changes to address issues. Therefore, the Evaluation Questions set out below were applied in the same way for Beta as for the Pilot.

The five Evaluation Questions represent the Beta's measures of success.

1 **EQ1:** Is the process of becoming an ER Consultant accessible, fair and consistent?
2 **EQ2:** To what extent has Beta shown potential for BER to streamline the bat mitigation licensing process?
3 **EQ3**: To what extent has Beta shown potential for BER to raise and maintain professional standards?
4 **EQ4:** To what extent has Beta shown potential for BER to improve outcomes for bats?
5 **EQ5:** To what extent can BER be deemed scalable, sustainable, and possible to be maintained at a National Level?

1.10 Evaluation Questionnaires

Assessment and Accreditation Questionnaires

Questionnaires were created to gather feedback from discrete groups of participants on the A&A process.

Questions on the four stages of the A&A process were sent to:

- Accredited BER Beta Lead Assessors/Assessors, hereafter referred to as 'Assessor(s)'
- Interested parties who did not engage in Beta following an invitation to take part
- Candidates that withdrew from Beta at any stage in the process
- Candidates that were unsuccessful at any stage in the process
- Successful ER Consultants
- Internal BER Project Team
- Partners (CIEEM and BCT)
- Moderator

A total of 115 A&A process questionnaires were sent (across all groups) with a 48% response rate.

In addition, feedback was sought specifically on the remit of Moderator and Assessors from:

- Assessors, and
- Moderator

A total of 16 role questionnaires were sent to which 69% responded.

A summary of A&A responses is provided in Annex 1.

Site Registration Questionnaires

A questionnaire was issued to ER Consultants who had submitted a BER online site registration (QB10) request between 1 January 2023 and 31 May 2023 to provide a snapshot of how the system was working. 57 Questionnaires were sent with a 42% response rate. A summary of SR data is provided in Annex 2.

1.11 Parallel testing

Parallel testing is a method that tests/audits the same inputs through two different systems, identifying anomalies between the two.

Parallel testing of A&A in the Pilot recommended that for Beta decisions based on dual assessments (where two Assessors score the same candidate independently) should be thoroughly cross checked, to confirm that BER is a fair and consistent approach.

Beta A&A again used the dual assessment approach. The intention was that every Assessor newly appointed for Beta would do at least one dual assessment alongside an Assessor who had carried out assessments for the Pilot. However, due to the Candidate withdrawal rate, dual assessments for all new Assessors were not possible. In those cases, as an additional check, a technical review of their assessments was carried out by a Lead Assessor and the Moderator.

Additionally, the A&A process was changed, with more checks made before decisions were issued to Candidates, and separate Lead Assessor and Moderator roles to give improved capacity for support to Assessors and cross-checking of consistency in Assessor approach. This has allowed any issues in inconsistency between Assessors to be addressed in a timely manner during the process.

As for the Pilot, a final Natural England review of all successful candidates is being conducted in Beta, and is finding good consistency between Assessors and that appropriate accreditation decisions are being made.

2 Answering the Assessment and Accreditation Evaluation Questions

Monitoring data was captured by and analysed from application information, questionnaires, internal A&A 'trackers' (Excel spreadsheets), Qualtrics and SharePoint Lists, and free text email correspondence.

EQ1: Is the process of becoming an ER Consultant accessible, fair and consistent?

- All Natural England staff, sub-contractors e.g., Assessors, and Candidates were made aware of the Fair Access Policy ('the Policy'). The Policy supported compliance with relevant Equalities legislation and was used in conjunction with Natural England's Diversity and Inclusion Policy to set out Natural England's principles and approach to ensuring that all applicants had an equal chance of success regardless of any disadvantage that may, without reasonable adjustment, have prevented them accessing and achieving Accreditation. Nineteen participants requested and were accommodated reasonable adjustments.
- The comparison between accessibility of BER Beta with BMCL remained the same as for the Pilot, and found that:
  - for both approaches everyone could apply for the species cover they wished for, with the outcome determined by the assessment of their application.
  - BMCL relied on having enough applicants to run a training course whereas BER is not dependent on achieving a certain level of interest.
  - Mandatory Professional Body Membership introduced for Beta brought Beta in line with BMCL (Professional Body Membership being a requirement for BMCL).
- We again looked at geographic coverage because, as with the Pilot, a small number of applicants felt that Beta was not appropriate for 'northern' bats, and some commented that it was difficult for sole/small companies to become accredited. Accreditation application statistics showed representation in each region[4], for each of the three Accreditation Levels (AL), and all company sizes[5], except for the Tree and Woodland Annex in Greater London. The chart at Figure 1 shows the geographic spread of Accreditation applications, by company size, for each AL.

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[4] E Midlands, E of England, Greater London & London Boroughs, N East, N West, S East, S West, W Midlands and Yorkshire & Humber

[5] Company size (number of employees): Sole, Micro (1-10), Small (11-49), Medium (50-249) and Large (250+)
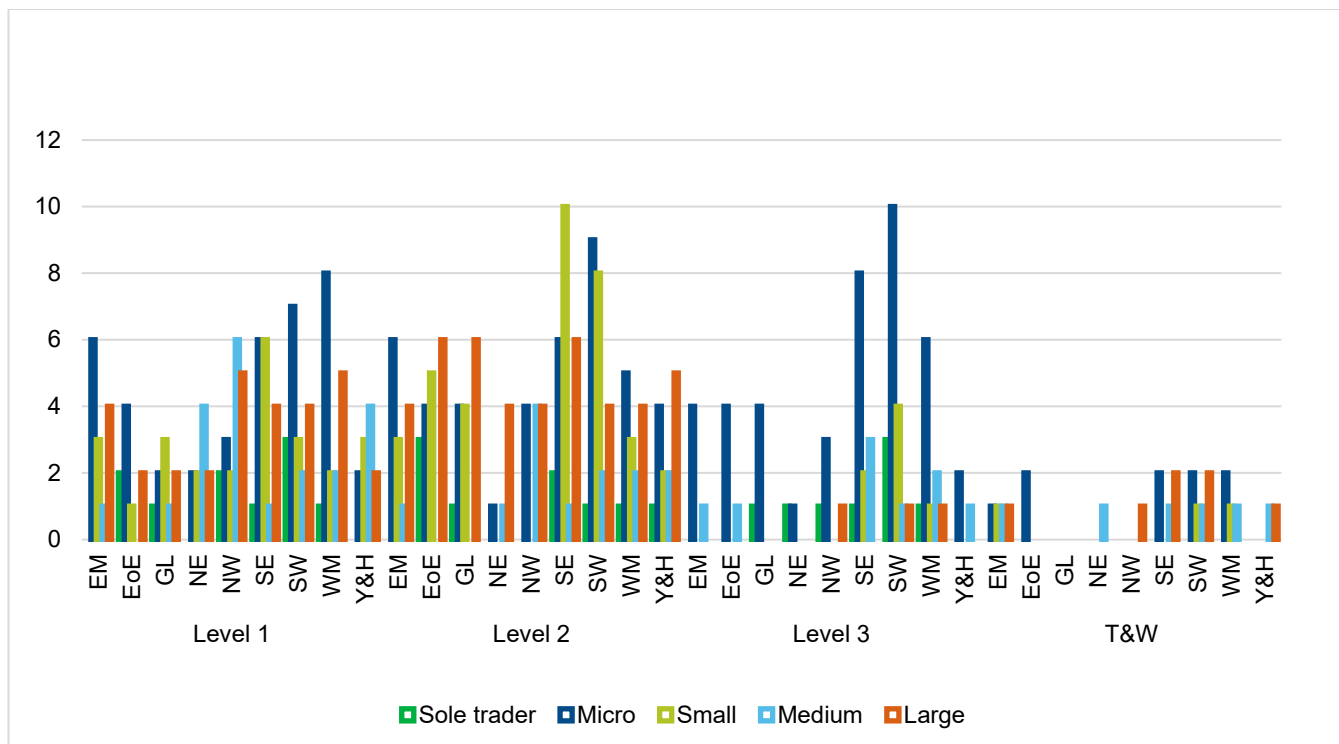
Figure 1 Geographic spread of Accreditation applications, by company size, for each Accreditation Level

- Whilst the number of applications for Beta decreased for the higher ALs, application data demonstrated that all 21 Principal Work Areas were represented at AL1 with the addition of 'National Trust Properties' and 'Bio census work with industries'. Forestry was not covered by AL2 but 'Flood Alleviation (EA)' was added as an additional Work Area. All Principal Work Areas except Archaeological Investigation were covered by AL3.

- The system has been specifically designed to ensure that anyone with evidence of sufficient competence (from any source) can achieve Accreditation. However, we are aware that the need to define a scalable and sustainable assessment process has resulted in some candidates being unable to meet specific elements of this. The approach will need to be adapted for those with evidence of competence outside of the defined tests.

- Those with less than five years in the business accounted for 7% of the 150 applicants, and - as of the cut off date[6] - 8% of the accredited ER Consultants. This demonstrates that bat consultants starting off in the industry, with sufficient competence but minimal evidence of that competence, were not excluded from becoming accredited.

- A few Candidates commented that the groupings of the Species Annex(es) did not suit sole traders/small companies because they cannot work on larger developments which they feel provide access to a wider range of species and habitat types. BER is designed to test, and has tested in Beta, a broad set of competencies, which are designed to be appropriate to any size of business/development. Figure 1 shows that applications have been received

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[6] 13 October 2023

from all sizes of companies at each Accreditation Level (with micro companies making up a high proportion of AL3 applications). Anecdotally, candidates from smaller companies are often found to have a good spread of evidence across all aspects of bat work, rather than specialising in certain aspects. We are, however, continuing to investigate whether there are specific challenges to candidates from smaller companies, including the time commitment required.

- Accreditation data shows that any bat consultant from any size of company/geographical region, whether they have less than 5 years, or over 20 years in the business, are able to get accredited if they are sufficiently competent.

- Feedback from the Pilot, suggesting that some individuals were unable to achieve their desired level of Accreditation due to lower competence on a very specific area, e.g. tree roosts, was addressed for Beta through a review of the Species Annexes, which were simplified and requirements set so that not every aspect needed to be evidenced. A specific Tree and Woodland Annex ('T&W Annex') was also introduced to separate out skills relevant to tree and woodland work. It was recognised by the Assessors and BER PT that Candidates struggled to evidence the competencies for the T&W Annex, and that the T&W Annex needs further development.

- Where EQ1 questions were specifically asked, of the respondents who expressed a view, 58% agreed that their Assessors were fair in their assessment[7]. There was no explanation given from the 25% who did not agree that their Assessors were fair in their assessment (the other 17% expressed no view). Asked to what extent Candidates agreed that the process was a fair and robust assessment of their competence[8], 58% agreed. The 42% (n=4) who did not agree felt let down by poorly worded questions and the relevance of questions to the AL applied for. This would indicate that the detail of the assessment requires improvement, but the basis of the assessment was, largely, considered to be a fair process.

- Qualitative feedback from a small number of Candidates indicated perceived constraints in the Candidate ER Consultant being accredited to the level they felt they were competent to. This was balanced by feedback from the Assessor Team that some Candidates applied for Accreditation Levels and/or Species Annexes that they could not evidence as being competent to hold.

- All assessments recommending Beta Candidates for accreditation were independently checked by BER PT members to test the consistency of Assessor technical decision making against the scoring/marking criteria. Feedback from the BER PT showed that whilst there were some inconsistencies between how the Assessors interpreted the guidance and remit of their role, any differences of opinion were resolved through engagement with the Moderator/BER PT.

- A Moderator for Beta, who was not a bat ecologist, was also active throughout the A&A stage to provide support to the Assessors on technical aspects of assessment procedure,

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[7] Questionnaire QB3 & QB5
[8] Questionnaire QB4 & QB5

and to aid consistent decision making, including moderating cases where there were differing conclusions at dual assessment and borderline cases.

- The number of Further Information Requests (FIRs) a Candidate might receive was capped at two for Beta A&A. This maximum of two FIRs for any one issue has been applied consistently.

In conclusion – Following the review of all processes and materials and the improvements made for Beta - as a national licence, evaluation data indicated that BER is accessible to all bat consultants and, overall, it is considered a fair system.

EQ2: To what extent has Beta shown potential for BER to streamline the bat mitigation licensing process?

Accreditation

- The applicant's time commitment for Beta BER Accreditation is double that for BMCL applicants (see Annex 3, Table 3). This has not changed from the Pilot. However, up-front time dedicated to BER should be seen in the context of being able to receive rapid turnaround on much higher risk site registrations than BMCL allows.
- Staff Full Time Equivalent (FTE) for assessing a Beta BER Candidate is almost half as for a BMCL Candidate (Annex 3, Table 3). In this instance 'Staff' includes external Assessors and Moderator. The FTE saving of 0.67 for Beta compares favourably with the Pilot, where assessment times for BER were almost the same as for BMCL. Given the wider remit and reduction in costs and delays to the customer, developers, and Natural England that BER is delivering, it would be more sensible to invest in the BER process than continuing with processing BMCL applications. (See 'Site Registration').
- The majority of responses received to questions regarding the suite of Assessor and Candidate A&A guidance documentation indicated to us that the review and improvements made for Beta had improved the guidance for most Candidates. However, many Assessors found the Portfolio guidance in particular unclear.
- The Beta A&A process was undoubtably more onerous for all parties than anticipated at the outset of Beta. This was in part due to the short time between the end of the Pilot and the start of Beta to do a comprehensive document review. As with the Pilot, the main issue identified centred around the length of time required to assess Candidate Portfolios and the poor quality of evidence, which led to more FIRs. The Beta Portfolio guidance and test methods will be reviewed, to further streamline this element of the assessment process (for both the Candidate and Assessor) and learning will be applied. Long-term this will save costs for Natural England and should make BER more attractive to consultants i.e., ensuring faster payback on time investment.

Site Registration

- The sample size available during Beta made it difficult to do a full comparison, but from the contrast between current casework processes and BER we anticipate:
  - BER casework processing by Natural England takes slightly less than the time taken for BMCL, is almost four times faster than for Bat EPS-MIT Low Risk, and over three times

faster for processing Bat EPS-MIT High Risk casework (each licensing route was compared to the BER AL equivalent in risk level (Annex 3, Table 1). This represents an improvement in savings at all risk levels since the Pilot, as was predicted as both staff and applicants become familiar with the process hence making assessments faster.

- Proportionate to the risk level (AL1 or AL2), 40% of cases went through without the need for targeted assessment. This means that internal resources could be focussed on higher risk cases, and free up-front time for compliance checking.
- Overall – across the three risk levels – with BER the time saving for Natural England is in excess of 50% (Annex 3, Table 1).
- The BER site registration form captured the time an ER Consultant takes to complete each submission and figures show that the more streamlined approach with BER will save an ER Consultant almost 20% of their time over Bat EPS-MIT casework submissions, depending on the AL (Annex 3, Table 2).
- The faster licensing process and shorter waiting time for a decision enables the ER Consultant to forward plan with confidence. With the consequent reduction in delays and potential reduction in costs to their clients, BER also meets the needs of the developer, resulting in positive perceptions about bats and licensing.

Conclusion:

- With continued necessary and appropriate adjustments to the A&A process e.g., further streamlining of the Portfolio stage, it is conceivable that the BER A&A process would be sufficiently streamlined as to reduce costs for Natural England and its customers compared to BMCL.
- Accreditation gives access to the BER Site Registration process, which has delivered a significantly more streamlined process for both Natural England and ER Consultants (and their clients/developers).
- Overall, Beta demonstrated considerable streamlining over current systems and implementation of the improvements identified during Beta would, potentially, make the process even more efficient.

EQ3: To what extent has Beta shown potential for BER to raise and maintain professional standards?

- Our Assessor Team indicated that some Candidates applied for annexes for species and/or roost types they were unable to evidence competence in. BER has the potential to challenge standards, and some Candidates' overconfidence, and act as a filter to ensure only those persons who are competent to undertake the work can do so (thereby raising standards).
- In addition to the above, a number of Portfolio submissions included work which Assessors identified as containing evidence of poor practice. The submission of such reports in support of Accreditation assessment would suggest Candidates were confident in their actions and were unaware of any misjudgements. This indicated that BER can help to identify poor professional practice (and advise them on areas of poor practice in support of their continued professional development).

- Ensuring the appropriate maintenance of professional standards was also part of Beta. Key to this, and a crucial element of the BER approach, was compliance checking licenced work to help inform/ensure compliance with good practice. The intention that all ER Consultants had a minimum of one compliance check was subject to delay due to limited staff capacity during trial stages. An additional obstacle to meeting our compliance target were availability of staff with the experience to complete compliance for high conservation status roosts or high-risk roost types. Higher risk sites were prioritised for compliance checks and of the ER Consultants who had registered at least one site:
  - 33 ER Consultants received a desk-based compliance check, 10 of which were full compliance checks.
  - Two ER Consultants received a site visit.
  - 14 ER Consultants were flagged for compliance but have not to date had a compliance check, and
  - Seven ER Consultants who registered a 'lower risk' site were not flagged for compliance but will be compliance checked in due course.

  See Annex 3 Table 5 for further details of compliance check figures.

  Since roll out, and as more staff are trained in BER, we anticipate a significant increase in the number of compliance checks.
- Another safeguard of the BER approach centres on time-limited ER Consultant Accreditation. ER Consultants accredited during the Pilot have had their accreditation extended through Beta and beyond. It is intended that ER Consultants will complete regular reaccreditation, e.g. every 3-5 year re-testing, either wholly or partially, against the Competency Framework (CF). The re-testing of those initially accredited during the Pilot is planned to take place sooner than three years after initial Accreditation.
- Mandatory Professional Body Membership was introduced for Beta, providing Partners with the reassurance they sought that bat consultants' professional standards are being maintained by following a Code of Professional Conduct, having Continuous Professional Development requirements and there being a disciplinary process. This is caveated by the need for the situation/evidence to be monitored over time. It is also felt that more Professional Bodies should be brought on board ongoing, if possible.
- Based on compliance carried out to date, alongside the improved monitoring and licence return information we now require, we anticipate that professional standards will be raised and continue to be maintained, leading in turn to an improved outcome for bats.

Conclusion: As with the Pilot, there is not yet enough data available to evidence an improvement in standards. However, informal feedback and initial data shows that the BER approach does have significant potential to raise and maintain professional standards.

EQ4: To what extent has Beta shown potential for BER to improve outcomes for bats?

- The potential to improve outcomes for bats was difficult to evaluate within the lifetime of Beta, as monitoring data of licenced activities was sparse. More information will become available over the next few years as monitoring work increases. Work with Partners and stakeholders is helping to identify how to capture the best information to assess outcomes

for bats, as more information becomes available over this time period. With sufficient investment of resource, this will allow more effective evaluation of the outcomes for bats under BER, than has been possible under licensing regimes to date and allow for continual improvement to BER to maximise outcomes for bats in the long-term. The improved quality of monitoring data collected also has the potential to inform best practice in relation to mitigating the impact of development on bats.

- The Site Registration questionnaire sought the ER Consultants' opinion on whether BER was a means of maintaining and/or improving outcomes for bats. The majority of responses (83%) were positive whilst 13% were 'not sure'. The 4% (n=1) who did not agree that BER was a means of maintaining and/or improving outcomes for bats suggested that more site visits were needed, and greater enforcement powers by Natural England.

- Improving outcomes for bats is also closely linked with EQ3 (professional standards) and it can be inferred from the evaluation of this element, that BER is likely to result in improved outcomes for bats due to anticipated higher standards of professional practice.

- A streamlined licensing process, reducing delays to work, is likely to help counter negative views of bats associated with developments, and encourage developers to 'do the right thing' with respect to bats. Indeed, recently an ER Consultant working on a complex site commented that the flexibility of the BER licence enabled a positive relationship with contractors and because the bats weren't a barrier, contractors were happy to make concessions that they weren't obliged to do under the conditions of the licence.

- Given the conclusions on likely raising of professional standards we anticipate this will lead to improved outcomes for bats.

Conclusion: Insufficient data over the timeframe of Beta, but the measures put in place allow for significant improvements due to better practices and improved 'PR' for bats, and for more effective longer-term monitoring to inform ongoing improvement to the BER approach, and potentially wider best practice.

EQ5: To what extent can BER be deemed scalable, sustainable and possible to be maintained at a National Level?

Accreditation Materials and Assessment

- Despite improvements being made to the A&A materials and process between the Pilot and Beta, further work is required to make A&A more efficient. Based on qualitative feedback a number of areas have been identified for potential improvement, including:
  - Competency Framework. Streamlining of the CIs and making assessment/marking less complicated and time consuming.
  - Candidate and Assessor guidance. Clarification of issues identified during Beta.
  - OST. Clarity of wording of the questions and photographs making effective use of virtual landscapes.
  - Portfolio. Improvements to the Assessor guidelines and marking criteria to facilitate a more efficient assessment process.

- o Portfolio. Since many Candidates in both the Pilot and Beta were unable to access evidence because of moving jobs and/or due to client confidentiality, a review of how candidates provide evidence.

- A&A materials need to ensure a diverse set of 'unique' questions for Candidates, and Accreditation materials would need to be regularly updated, so that they remain 'novel' tests and up-to-date. This needs to be factored into long term planning for BER.

- Assessment scalability is largely dictated by the number of BER Assessors that can be recruited and retained in roles, and their capacity. Assessment capacity is also likely to be seasonally constrained by having more capacity during quieter periods of the ecological survey calendar, i.e. winter. Although for Beta more ER Consultants were trained to become Assessors, delays with the process led to time constraints, which became a significant issue, and suitably qualified Natural England staff undertook/assisted in the Accreditation assessments. Lessons learnt from Beta A&A will inform the scale and timeframes of future A&A rounds.

- Feedback suggested potential long-term advantages in having a cohort of suitably qualified internal Assessors and an internal (non-technical) Moderator to work alongside external contractors. This is not necessarily a requirement to ensure scalability, but would have potential longer-term advantages. Such advantages are:
  - o Year-round availability and capacity to carry out assessments, and continuity with the established principles of BER.
  - o Ongoing, a standardised and controlled approach to moderation and ensuring an enduring fair and consistent approach to BER.
  - o Increased control over timescales and a reduction in delays.
  - o Enhanced discipline around the use of personal data and IT systems, consistent with Natural England ways of working.
  - o Straightforward budgeting for staff and other resource requirements. Enlarging the Assessor team would require an increase in costs so, depending on the size of future Candidate intakes, using internal staff would help to reduce the overall administration costs.

- The sustainability of BER is dependent on the uptake of future tranches. Even without a significant comms drive, the interest in Beta was in excess of the maximum number of Candidates. As time goes on, and those initially interested in Bat ER become accredited, more comms around the benefits of Bat ER may be needed in order to encourage uptake by those consultants less convinced by the scheme. Publishing a register of ER Consultants so that they can promote/receive the benefit of having gone through the accreditation process will help to encourage more consultants to apply.

Site Registrations (Licensing)

- A scalable site registration process is dependent on sufficient resource and a fully functional IT system.

- To date Natural England has not charged for SR. However, there is an expectation that Natural England will recover costs for licensing (other than for those situations that are exempt). Charging for BER will be the same process as BMCL. Charges will follow the same approach as other licensing processes, with a fixed cost where site registrations are

approved and a variable cost where a FIR is issued. Being able to at least partially recover costs will result in sustainability of the system at a national level in perpetuity.

IT Systems

- The online testing platform for the A&A element of Beta relied on the use of CIEEM's 'Moodle' System. Moodle was successfully used in the Pilot, with adjustments made for Beta resulting in some improvements in efficiency. However, use of a CIEEM owned system was not viable as a long-term approach. Therefore, in preparation for roll out the BER PT has commissioned a dedicated Natural England owned Moodle, with the ability to further refine the system as an effective, efficient long-term solution.
- The digital online system for licence implementation/site registration and licence return processing that was created for the Pilot was further improved/developed during Beta and has been positively received. For roll-out, any new site registration system must also allow for charging and be compatible with the A&A system. Continuing ongoing improvement to the site registration IT is planned.

Conclusion: Indications are that with suitable adjustment, BER can be a scaled up for roll out as a sustainable approach, and progress towards this has been made with bespoke, Natural England owned IT systems in place.

3 How Bat ER meets wider Natural England strategies and commitments

Natural England's Roadmap sets out the organisation's vision, mission and four key goals including sustainable development. Within this is our contribution through statutory services (such as licensing), where we will lead the agenda through bringing people together and accrediting others to operate to high standards. The BER approach seeks to contribute to the vision of thriving nature by improving outcomes for bats, through leading this partnership project. BER uses the accreditation approach, aiming to raise and maintain professional standards among bat consultants, to protect bats' conservation status while facilitating development. If Beta successfully meets its listed objectives (section 1.3), it will also meet the wider vision, mission and goals of Natural England.

4 Summary

This evaluation set out to achieve a number of aims, as set out in section 1.5:

- Provide insight into the measures of success, what can be improved and managing risk.
  - The report has examined each of the EQs, which make up the measures of success. This has allowed a conclusion on each EQ. The areas identified for further development will be reviewed as part of the continual improvement of BER A&A in preparation for roll out. However, the conclusion is that each measure of success has been met, or is likely to be met under continued BER.

- Provide insight into how well the Pilot met the objectives of wider Natural England strategies and commitments.
  - In meeting Beta's listed objectives (Table B), the Pilot is also meeting the wide objectives of Natural England.
- Augment wider lessons learnt, informing projects and reforms in licensing (and potentially beyond).
  - The Beta report will be shared with licensing reform teams in Natural England, allowing ongoing conversations around scoping the potential for the BER model to be extended to other areas of licensing.

To fully understand whether BER meets the Objectives, the evaluation also needed to show that:

- There are successful Assessment, Accreditation and Licensing processes in place.
  - At the time of this Report, Beta had assessed 155 applications. 27 ER Consultants attained Accreditation, 32 Candidates failed, 53 Candidates had withdrawn and 43 assessments were ongoing.
  - In excess of 150 site registrations have been determined in Beta.
    Evaluation has found that both processes were sufficiently robust, with very positive feedback from ER Consultants on how well the online SR system worked.
- There is a working and appropriate IT system that allows bat consultants to successfully submit accreditation applications and site registrations, and
- The IT system enables Natural England to successfully process accreditation applications and site registrations in a streamlined way.
  The changes that were made to the IT systems used for Beta A&A enabled the process to operate in a more efficient way than for the Pilot, with further improvements possible with the bespoke Natural England owned IT system in place.

The continuous improvement of the online site registration platform has resulted in a favourable ER Consultant experience, and benefitted Natural England in terms of how it handles/processes and assesses casework. Still, the IT system needs further development to enable an enhanced customer journey and a better system for data management internally. Having met these aims and requirements, we consider the evaluation to be sufficiently robust to determine that Beta's Targets and Objectives have been met.

Tables A and B give a brief summary of how/whether each target and objective was met.

Table A Summary of the evaluation of the BER Beta Targets

Beta Target	Evaluation
Provide the information necessary to develop an evidence-based design of the BER approach that could be rolled out nationally	Information from Beta is allowing us to further develop the BER approaches and materials in preparation for roll out.

Beta Target	Evaluation
Train a sufficient number of ER Consultants to enable accreditation assessments of enough ER Consultants to facilitate Beta.	The target to train an additional 15 ER Consultants to become BER Assessors was met. The intention to have Candidate assessments carried out by an Assessor with at least the same or a higher Accreditation Level was assured, with most Assessors accredited to AL3. Two Assessors from the Pilot were engaged as Lead Assessors to provide technical support to Assessors, and one Moderator was also recruited to provide non-technical assistance to the Assessor Team.
Achieve BER accreditations of sufficient numbers/types of ER Consultants to robustly test the accreditation process.	The target of accrediting a further 93 ER Consultants was not met. For Beta Candidates who have completed or left the process so far[9] 24% attained Accreditation, 29% failed and 47% withdrew. Those left in the process (n=43) are in the latter stages of assessment, and hence relatively likely to achieve accreditation. Should that be the case, a maximum of 70 Candidates will be accredited through Beta. The withdrawal rate is much higher for Beta than with the Pilot where, excluding the 12 Assessors, 46% attained Accreditation (n=45), 32% failed and 24% withdrew. However, Beta assessed a higher number of applications. Overall, the total number of assessments completed under Beta was enough to test the accreditation process and highlight areas for improvement, in preparation for roll out.

[9] 07/11/20/23

Beta Target	Evaluation
Determine enough streamlined licence applications to provide sufficient evidence to determine the efficacy of the BER concept and the supporting systems and processes.	Evaluation is based on over 130 site registrations having been submitted, and 20+ site registration questionnaires having been received. This is sufficient to make a judgement on the efficacy of the BER approach.

Table B Summary of the evaluation of the BER Beta Objectives

Beta Objective	Evaluation
Streamline the bat licensing process for stakeholders by reducing delays, issuing licences more quickly and improving certainty from the outset.	Data shows that BER has the potential to result in significant streamlining compared to current approaches, resulting in quicker turnaround and, anecdotally, increased certainty.
Raise and maintain standards in bat licensing to enable delivery of high-quality environmental outcomes and increased accountability, resulting in and ensuring timely and appropriate decisions within licensing to provide better outcomes for bats.	As with the Pilot, there is a lack of definitive data on whether professional standards are raised/maintained, but informal qualitative evidence shows that there is good potential. Whether the approach results in improved outcomes for bats is difficult to determine in the lifespan of Beta. However, the better standards of practice would heavily infer that improved outcomes for bats will result. Improved monitoring data collection will, with sufficient investment of resource, allow better evaluation of outcomes for bats from work licensed under Bat ER, allowing for continual improvement to maximise outcomes in the long-term.
Identify the necessary framework and mechanisms required for national roll-out.	Indications from Beta continue to build on the conclusion from the Pilot that BER can be a scalable and sustainable approach, with further improvements identified to help achieve this.
Reduce the cost of administering the licensing system.	Streamlining savings have increased during Beta. Based on Beta learning and further

Beta Objective	Evaluation
	improvements in preparation for roll out, more savings are expected.
Free up resource availability for other organisational priorities, such as compliance monitoring.	Beta has demonstrated considerable streamlining over current systems. As the approach rolls out this will free up resource for other priorities, in particular compliance.

In conclusion, this evaluation finds that BER can be a scalable and sustainable approach, achieving significant streamlining of the licensing service and with potential to raise and maintain professional standards. Through this improvement in standards, the positive message from a streamlined licensing service, and collecting enhanced levels of monitoring data, it is predicted that this approach will lead to positive outcomes for bats.

Annex 1 Summary of responses to Assessment and Accreditation Questionnaires (QB1 – QB11)

The Assessment and Accreditation (A&A) Questionnaires sought feedback on all aspects of the BER Beta (Beta) A&A process from the following discrete groups of participants:

- Accredited BER Beta Lead Assessors/Assessors, hereafter referred to as 'Assessor(s)' (QB1, QB6 & QB11)
- Interested parties who did not engage in Beta following an invitation to take part (QB2)
- Candidates that withdrew from Beta at any stage in the process (QB3)
- Candidates that were unsuccessful at any stage in the process (QB4)
- Successful ER Consultants (QB5)
- Internal BER Project Team (QB7)
- Partners (CIEEM and BCT) (QB8)
- Moderator (QB9)

A total of 99 A&A process questionnaires were sent (across all groups) with a 46% response rate[10]. The number of responses for some groups was very small, and conclusions are therefore caveated as being based on a small sample.

In addition, feedback was sought specifically on the remit of Moderator and Assessors from:

- Assessors (QB6), and
- Moderator (QB9)

A total of 16 role questionnaires were sent, to which 69% responded[1].

It should be noted that not all the questions were asked of every group and, where applicable, not every participant answered the requests for an explanation. For each question covered below the number of respondents to that question is given in brackets. Necessary cut off dates for responses meant that many candidates had not completed the A&A process, and hence sample sizes for some questions in particular are small. Qualitative data has been drawn from both the questionnaire free text boxes and feedback captured in the BER mailbox.

Questionnaire QB10 was issued to ER Consultants who has submitted a BER online Site Registration request between 1 January 2023 and 31 May 2023, to provide comparison data in Annex 2.

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[10] Cut off dates varied between 15 February 2023 – 6 October 2023, depending on the stage in the process

Questionnaires QB1 – QB11

General A&A process questions

- Breakdown of Candidates who were new to the process for Beta and those who applied for Accreditation under the BER Pilot in 2021/2022 (n=20)
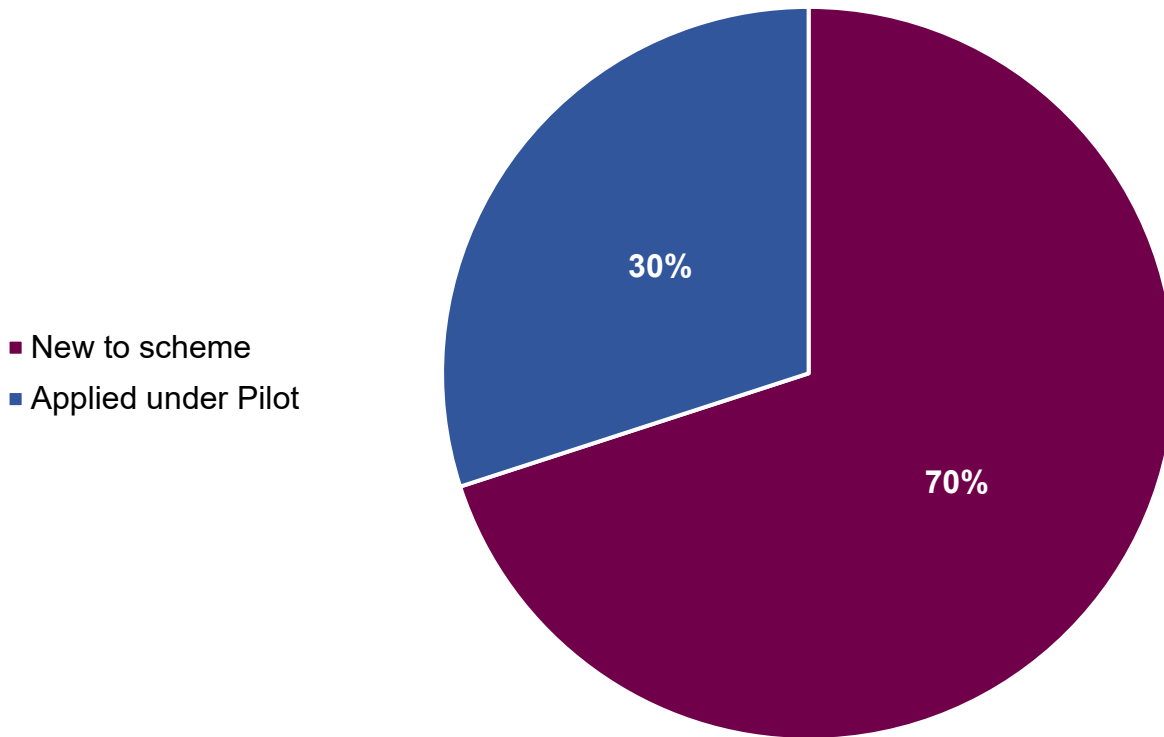
- The decisions prospective candidates (n=2) gave for not proceeding with any stages of the accreditation assessment, following an invitation to apply[11], were:
  - The application process (50%), which was considered too time consuming and a lot to fit in around work and other commitments.
  - Personal circumstances (50%).

- 86% Candidates agreed that the guidance adequately explained what was required of the prior to applying for BER.

- Of those asked 43% respondents said they were aware of Natural England's Fair Access Policy.

- No respondents requested any reasonable adjustments before starting the assessment process, and none requested reasonable adjustments having begun the assessment process.

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[11] QB2 only

- The extent to which Candidates agreed that the deadline for submission of application information allowed them an appropriate amount of time to respond (n=7)

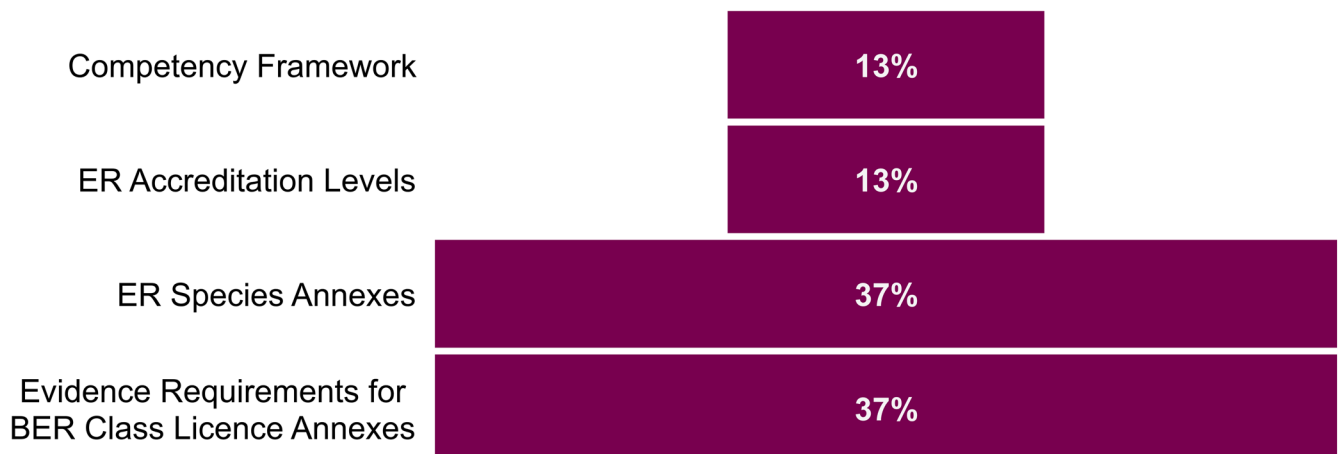|	
Agree	43%
Not sure	14%
Disgaree	14%
Strongly disagree	43%
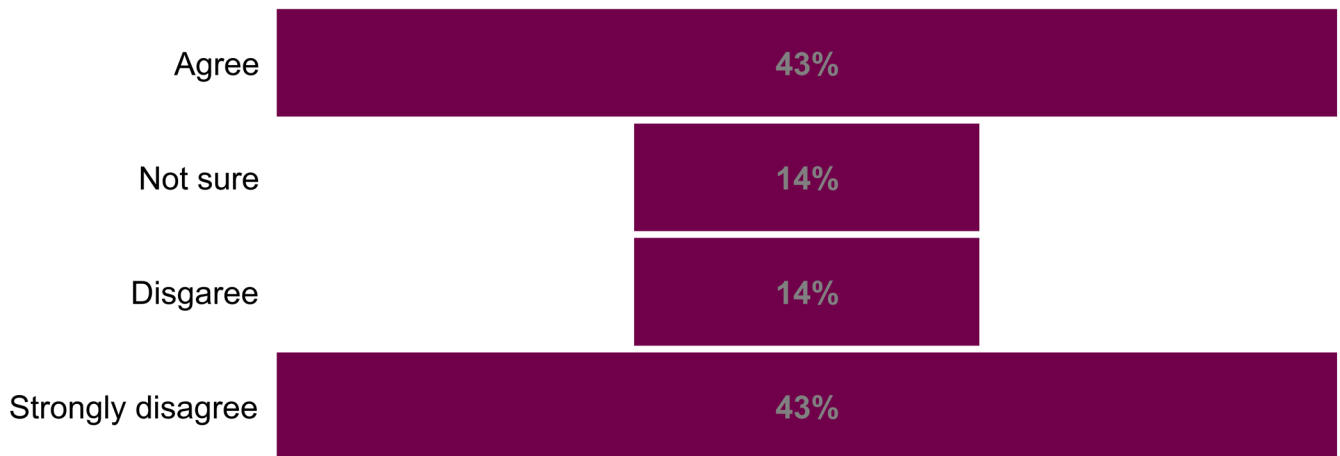
- Half the Assessors judged the risk of impacts on bats associated with each AL to be appropriate.
  - The 38% who thought not, were concerned that the species groupings would allow Consultants to work with species for which they had not demonstrated their competence. The remainder were 'Not sure'.

The split of Assessors' opinion, that the Candidates they assessed applied for the correct AL, given their demonstrated level of competence. (n=8)
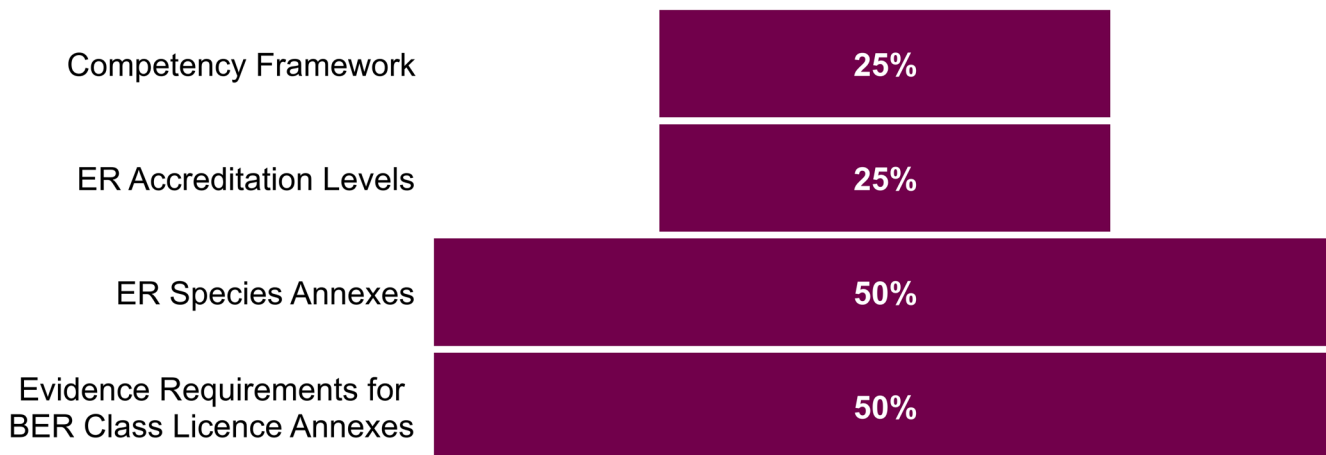

- Agree
- Disagree

37%

63%
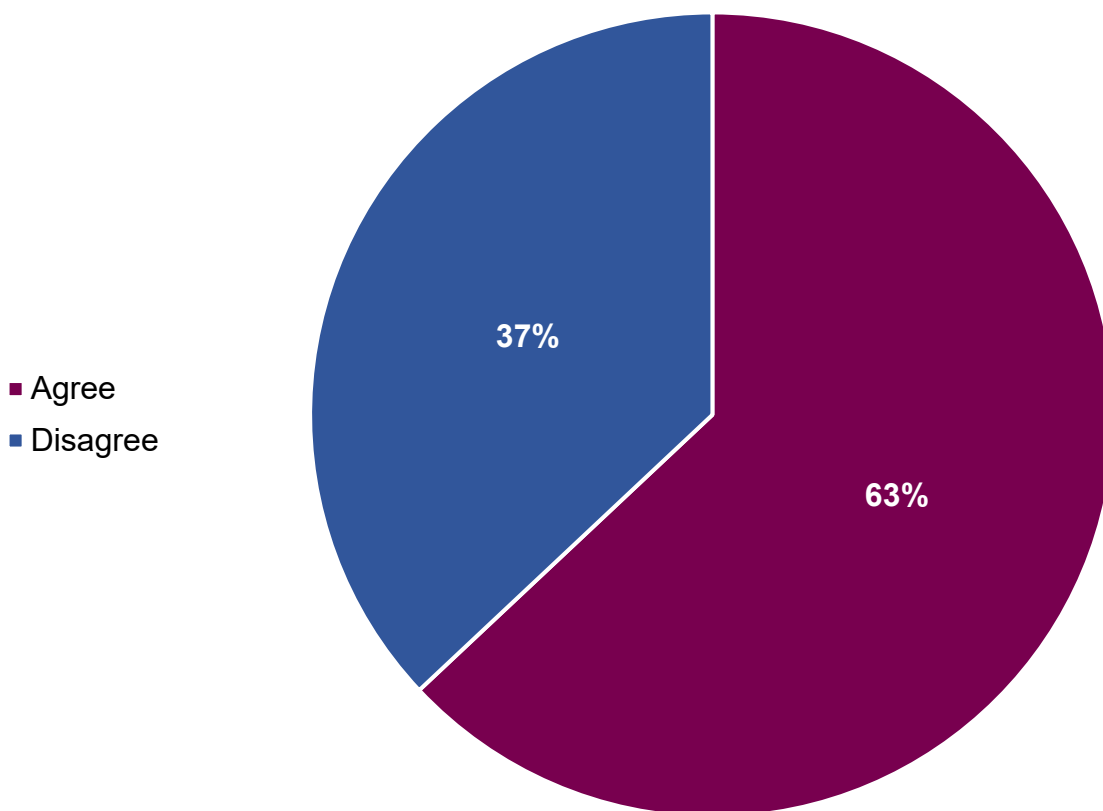
- The Assessors who disagreed were of the opinion that their Candidate(s) underestimated the need to actually demonstrate their competence.

- 64% Assessors agreed that the process of a Candidate's progression from one AL to another, in line with the relevant increase in competency is appropriate. No explanation was given by the 27% who disagreed. 9% were 'Not sure'.

- Most Assessors said they would expect the average consultant to progress from AL1 to AL2 over 3 years, depending on the experience the consultant gains in medium-risk situations, and the range of species encountered.

- Assessors' opinion on how many years they would expect the average consultant to progress from AL2 to AL3 varied from 3 – 6+ years depending on Candidates' exposure to relevant licensed work, but accreditation would not necessarily include all species groups.

- Of those that responded, 71% of Candidates applied for AL1 and 29% applied for AL2. No one had applied for AL3.

- 86% who applied under Beta agreed that it was 'Easy' to judge the appropriate AL and Species Annex(es) (to apply for).

- 75% felt able to apply for the AL that they thought aligned with their professional bat mitigation competence.
  - The aspects that prevented the other 25% from applying for an AL which they felt matched their professional bat mitigation competence were listed as (n=20)

Competency Framework	13%
ER Accreditation Levels	13%
ER Species Annexes	37%
Evidence Requirements for BER Class Licence Annexes	37%

- 80% said they were able to apply for the Species Annex(es) that they thought aligned with their professional bat mitigation competence.
  - The aspects that prevented the other 20% from applying for the Species Annex(es) which they felt matched their competence were listed as (n=20)

Competency Framework	25%
ER Accreditation Levels	25%
ER Species Annexes	50%
Evidence Requirements for BER Class Licence Annexes	50%

- Candidates who commented specifically on issues with the AL/Species Annex(es) and/or the CF said they were not able to meet some of the competencies due to the size of the company they worked for and, therefore, the size of developments they had access to and could evidence.

- 60% either strongly disagreed or disagreed that the guidance and communication within the Accreditation documentation was clear and fit for purpose. The remaining 40% were equally split between 'Agree' and 'Not sure'.

- More than half of those questioned disagreed that the CF was sufficiently clear to allow them to apply for the appropriate AL.

  - 31% agreed it was sufficiently clear and 15% were 'Not sure'.

- The extent to which Candidates considered the standard of the availability of, and communication with Natural England throughout the assessment process to be satisfactory (n=24)

|	
Strongly Agree	17%
Agree	22%
Not sure	22%
Disagree	17%
Strongly disagree	22%
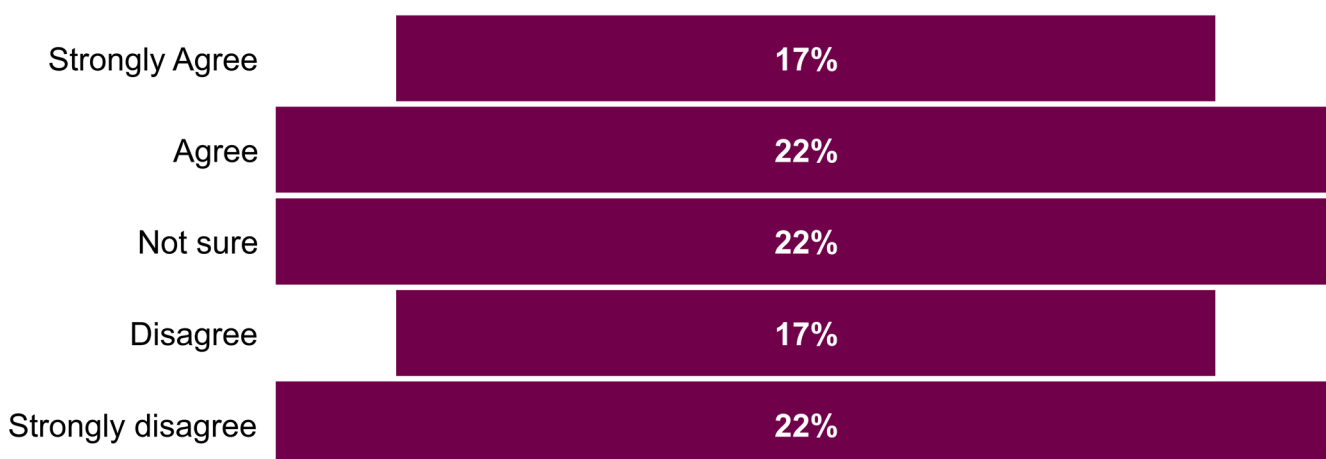
- Where communication was considered to have been poor, the main reason was the lack of updates from the BER PT, particularly in relation to the length of time between submission of FIRs and receipt of their results. Candidates were not happy that they were set short timescales to not hear anything due to delays to the project.

- The main themes from Candidate free text feedback on the application process e.g., difficulties, improvements, aspects to retain/that were welcome were:
  - Querying the need for, and the fairness of mandatory Professional Body Membership.
  - Lack of comms/updates from the BER PT.

Multiple Choice Questions (MCQ)

- Breakdown of responses on how Candidates felt that the MCQs were an effective test of their knowledge and understanding (n=7)
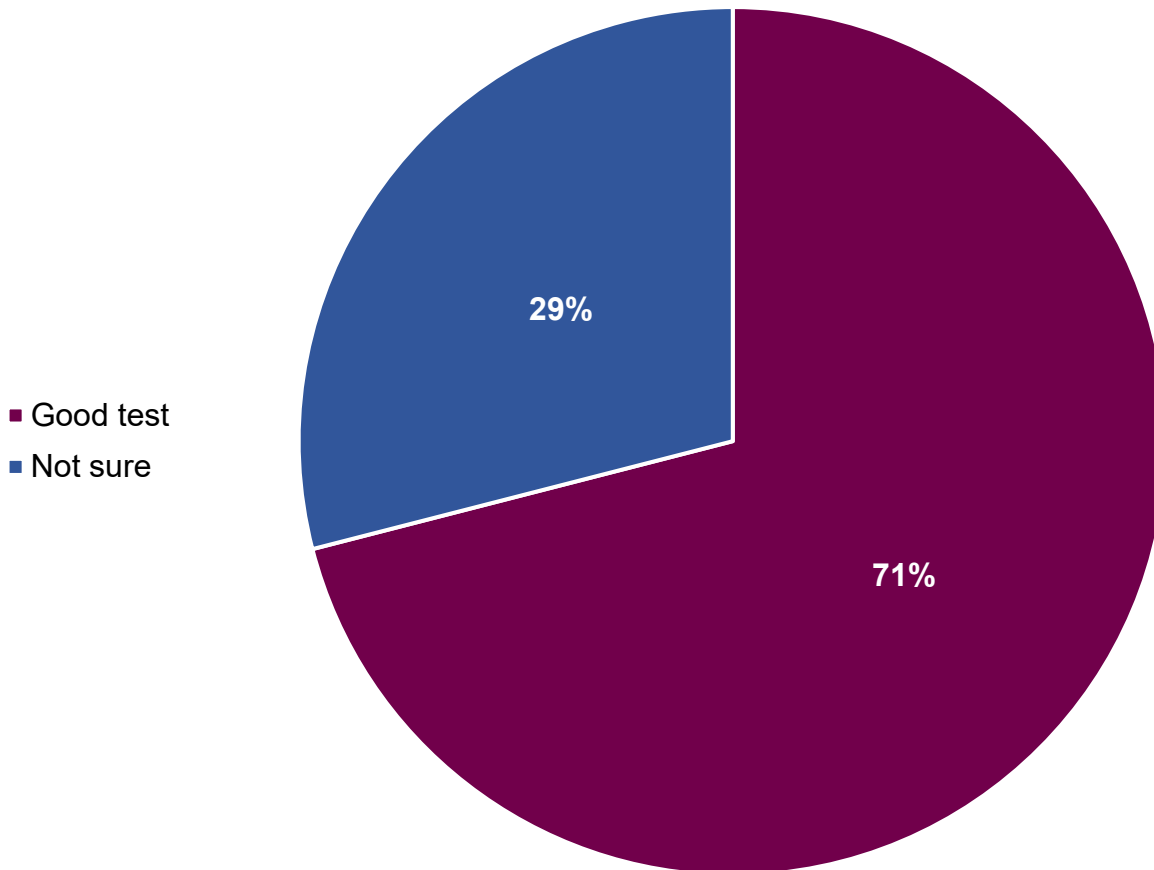

Legend:
- Good test
- Not sure

14%

86%
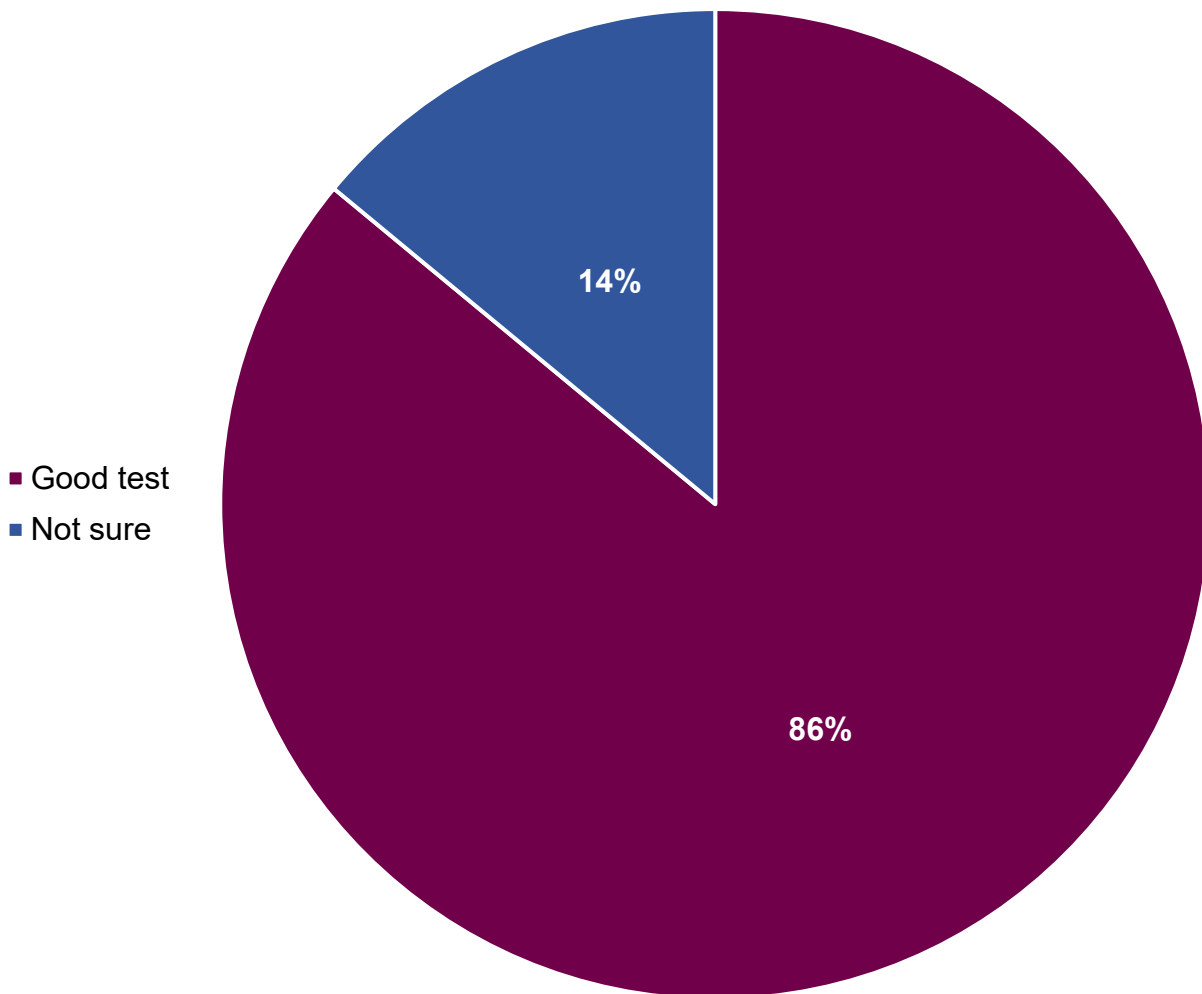
- All respondents found the Candidate guidance on MCQ Assessment helpful.

- 71% agreed that the time limit for the MCQ test was appropriate. The other 29% said that there was not enough time given to the MCQ test.

- 25% respondents left the process at the MCQ stage.

- The main themes from free text feedback on the MCQ test e.g., difficulties, improvements, aspects to retain/that were welcome were:
  - Many questions were similar and/or it was unclear what was being asked.
  - The time restriction was stressful, especially given the often lengthy questions.

- The questions were not relevant to the AL applied for.
- The poor quality and lack of context for the photographs was unhelpful.

Online Scenario Tests

- Breakdown of responses on how Candidates felt that the OSTs were an effective test of their knowledge, understanding and professional judgement (n=7)

- No one found the OSTs 'Too difficult' or 'Too easy'.

- All respondents found the Candidate guidance on OST Assessment helpful.

- 71% agreed that the time limit for the OST was appropriate. The other 29% said that there was not enough time given to the OST.

- 25% respondents left the process at the OST stage.

- The main themes from free text feedback on the OST stage e.g., difficulties, improvements, aspects to retain/that were welcome were:

  - The OST time limit was stressful.
  - Poorly worded questions made it difficult to know what was being asked.
  - More than one possible answer/subjective answers in some cases.

- The extent to which Candidates agreed that the T&W Annex guidance adequately explained what was required of them prior to applying for the T&W Annex (n=5)

Strongly agree	**20%**
Agree	**40%**
Not sure	**20%**
Strongly disagree	**20%**
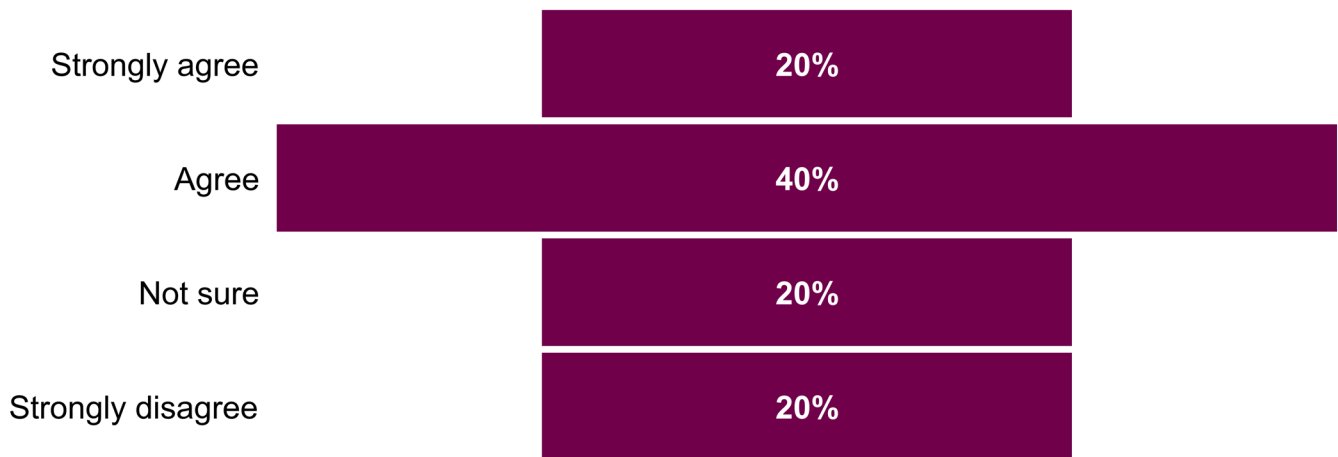
- The 20% who disagreed felt that the guidance lacked clarity on how to evidence some of the CIs.

- Of the 73% who did not apply for the T&W Annex, over half did not require the Annex. 18% required the Annex but as AL1 Candidates they were unable to register. Other reasons for not applying were lack of information, time and evidence requirements.

- Having applied for the Annex, 75% withdrew during the assessment process. The reasons were difficulty in providing the evidence required and shortage of time.

- 50% respondents felt that the Annex Portfolio assessment was an effective test of their knowledge, competence, experience and professional judgement.

  - 25% felt it was 'Too difficult' and 25% were 'Not sure'.

- Respondents were split 50/50 on the extent to which they agree that the Annex Portfolio was a good approach to evidencing their competence.

- The majority found it 'Difficult' or 'Very difficult' to find supporting evidence for the Annex competence due to having few licensed examples of work and access to evidence due to change of job.

- The main themes from free text feedback on the T&W Annex e.g., difficulties, improvements, aspects to retain/that were welcome were:

  - An onerous process.
  - Competency requirements are difficult to evidence.
  - Examples requested of how to evidence the competencies.
  - Prohibitive due to the requirement to have held trapping and radio-tracking licences.

- Breakdown of Candidates' opinion that the photographs used in the Additional Online Species ID Test (AOSIT) showed the key features needed for identification in equivalent field situations (such as a bat in the hand, viewing a bat within a crevice, free hanging, via endoscope?) (n=5)

Legend:
- Yes
- No

(Pie chart: 40% Yes, 60% No)
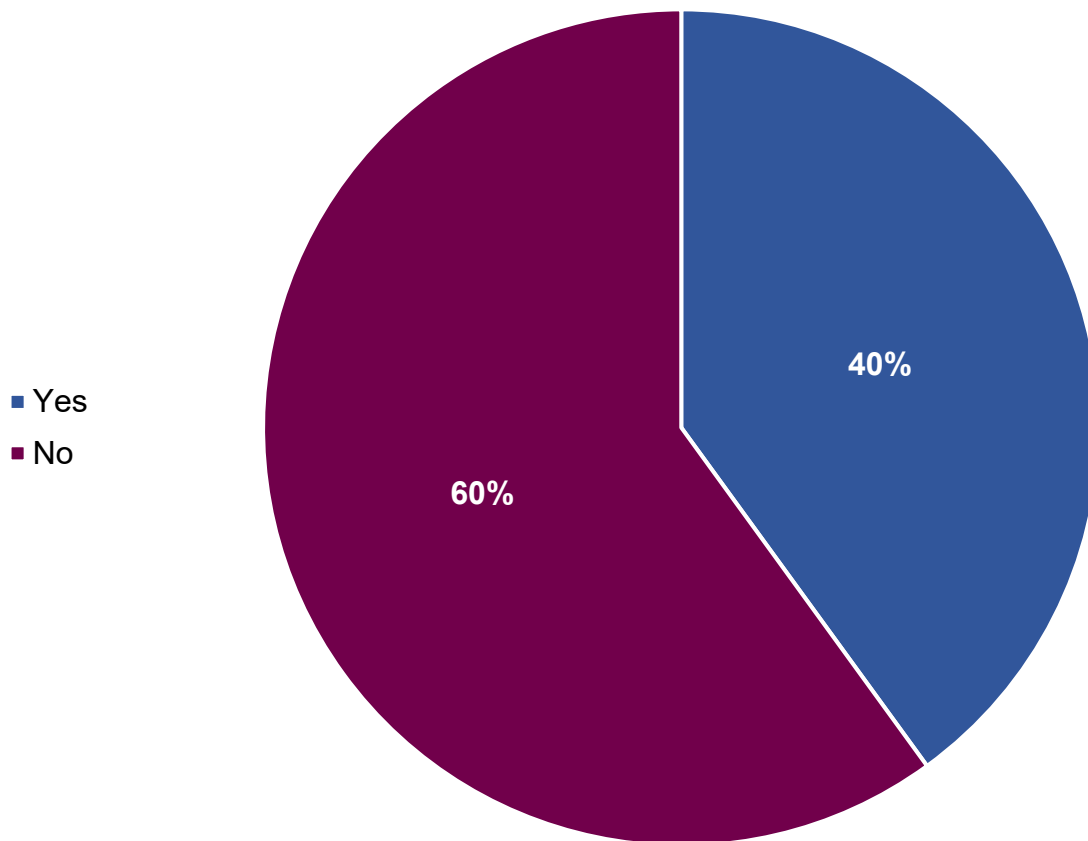
- Although ecologists would not normally identify a bat in flight to species level, 40% of Candidates thought that the photographs of bats in flight clearly showed the key features required for identification. 60% thought not.

- 40% Candidates felt that the AOSIT was an effective test of their knowledge, skills and competence in bat species ID in the field (using morphology).

  o 40% were not sure and the remaining 20% felt that the AOSIT was too difficult.

- 100% respondents found the AOSIT guidance helpful.

- The main themes from free text feedback on AOSIT e.g., difficulties, improvements, aspects to retain/that were welcome were:

  o Lack of contextual information made it an unrealistic test and did not assess bat skills in 'real life' 'in the field' scenarios.
  o Should be able to explain the reasoning behind the answer.
 o The late addition of the AOSIT added further stress.

Portfolio

- 71% participants had difficulty in finding the supporting evidence for the competencies and annexes. The main reason given was not being able to access evidence from previous employers.

  o 29% Candidates found it easy to find the supporting evidence for the competencies and annexes.

- Time taken for Candidates to complete their Portfolio (n=11)
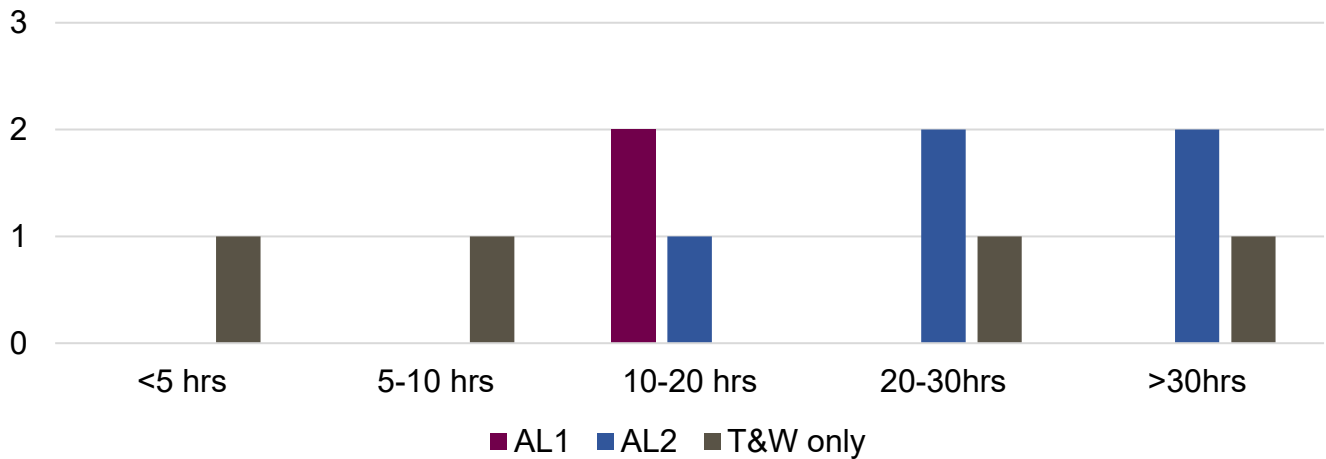
  - There were no AL3 respondents.
- Breakdown of how respondents felt that the Portfolio stage was an effective test of their knowledge, competence, experience and professional judgement (n=7)
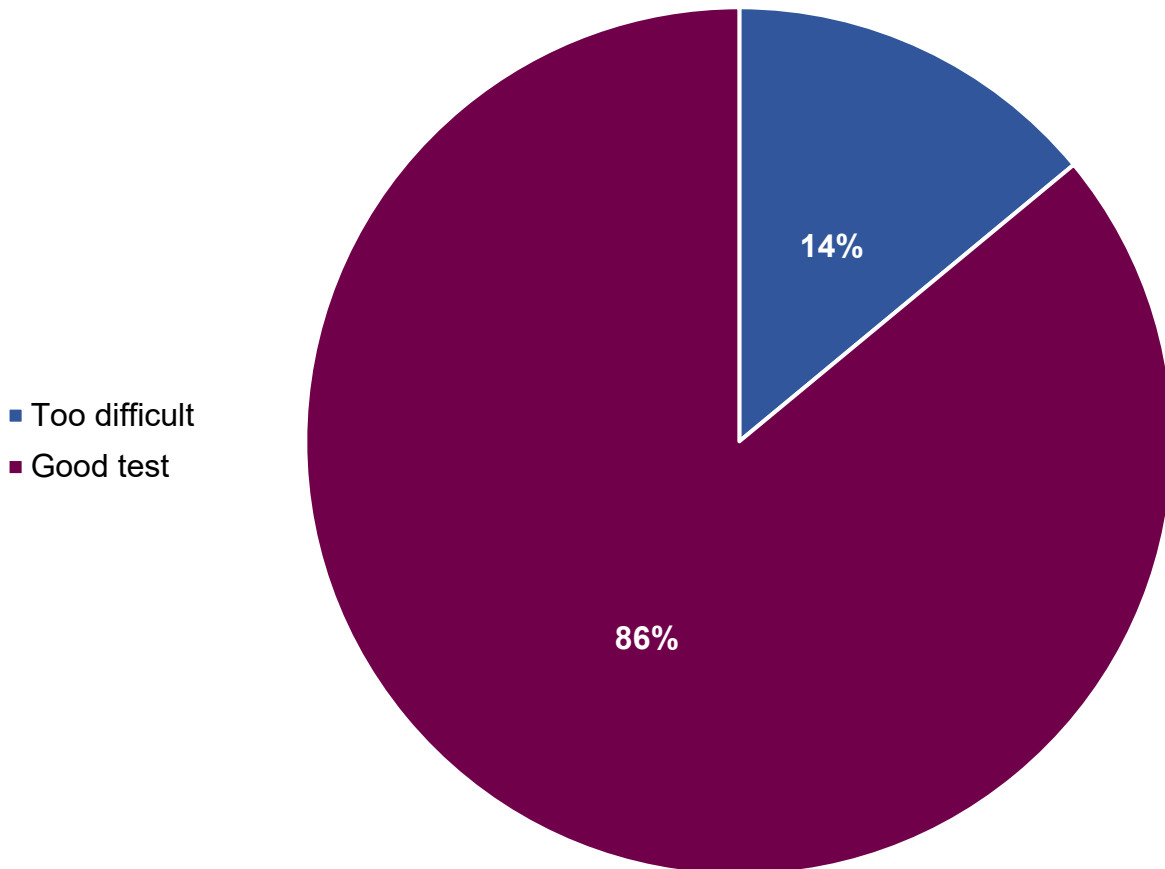
  - No one found the Portfolio stage 'Too easy'.
- The main themes from free text feedback on the Portfolio stage e.g., difficulties, improvements, aspects to retain/that were welcome were:

  - Time to complete the portfolio of evidence was excessive/onerous.
  - Access/unable to evidence casework.

- o Clearer guidance, made available at the outset of the process to know what to expect/do.
  - o The number of supporting documents Candidates could upload was not high enough.
  - o Length of time required to gather evidence.
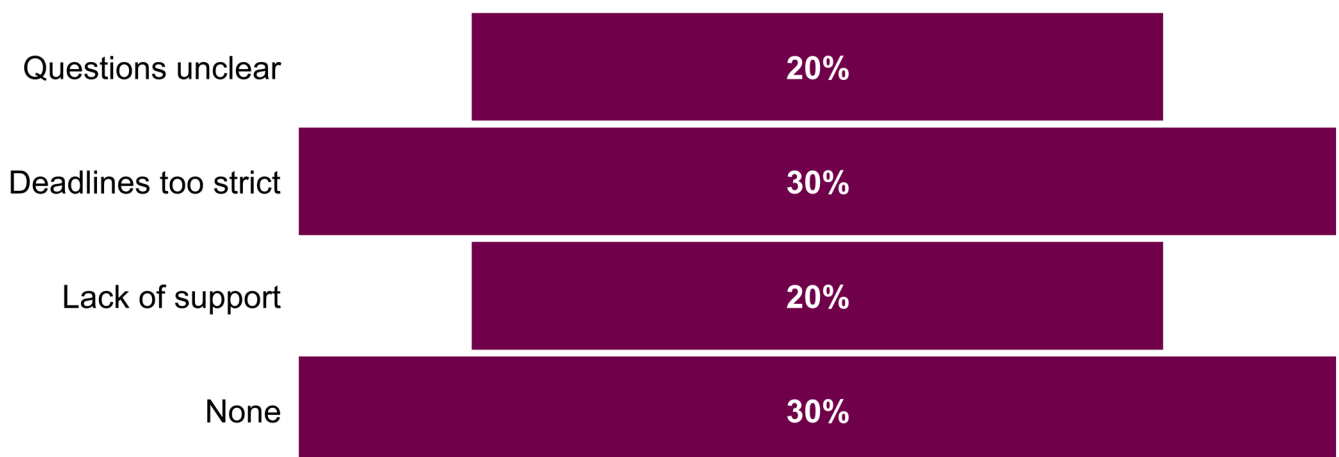 - o Poor timing and delays to the project encroaching on work commitments.
  - o Poor communications with BER PT.
- The degree to which Candidates felt that their Further Information Request(s) (FIR) clearly stated what information/action was required of them (n=11)

Category	Percentage
Yes - clear and understandable	55%
Not clear	9%
Understood but needed to follow up qns	9%
No FIR	27%
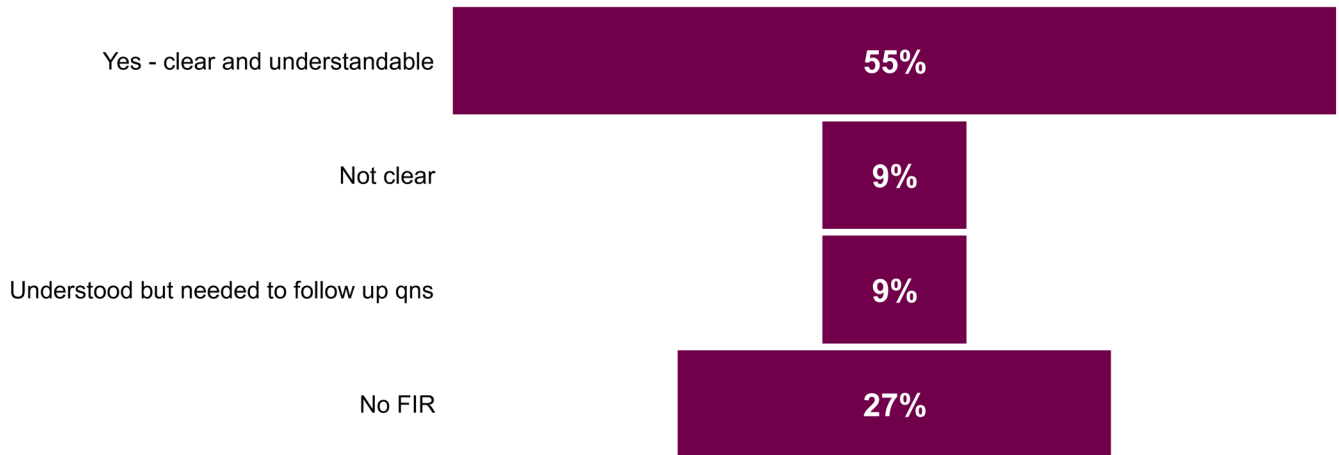
- Half the Candidates that received a FIR agreed that they were dealt with in a timely manner.
  - o 25% disagreed, and 25% were 'Not sure'.

- Reasons selected for aspects of the FIR process Candidates felt were unsatisfactory (n=10)

| Category	Percentage
Questions unclear	20%
Deadlines too strict	30%
Lack of support	20%
None	30%

- Asked to what extent Candidates agreed that Natural England took an appropriate amount of time to provide a result on each stage of the assessment process 43% agreed, 57% did not.

- Candidate insight into aspects they felt took an unreasonable time to complete were all stages from OST onwards.

- The late issue of Portfolio guidance meant that Candidates had very little time to gather and submit their evidence.
- The impact of tight timeframes and delays led to conflict with work commitments.

Interview

- 80% Candidates agreed that the interview was an effective test of their knowledge, competence and professional judgement. 20% were 'Not sure'.

- 86% found the Candidate Interview guidance helpful.

- Having successfully completed the A&A process, all Candidates responding considered their assigned/accredited/awarded AL and Licence Annex(es) to be a fair outcome.
  - However, there was comment that the Species Annex groupings were biased towards 'larger companies' in companies that work in southern counties.

- 71% felt that the competency and evidence requirements for each AL and Licence Annex are appropriate for the type of work each AL and Licence Annex permits.

  - The reason why the competency and evidence requirements for each AL and Licence Annex were not felt to be appropriate was that the T&W Annex requirement for trapping and radio tagging are restrictive and not mitigation techniques.

- Separately, 86% ER Consultants thought that the assessment process overall was a fair and robust assessment of their competence. 14% thought not.

  - Of the Candidates who were unsuccessful at any stage in the A&A process, 20% thought that the assessment process was a fair and robust assessment of their competence. 80% thought not.

- The extent to which participants considered their Assessor(s) to be fair in their assessment (n=12)

Strongly agree	33%
Agree	25%
Not sure	17%
Disagree	8%
Strongly disagree	17%
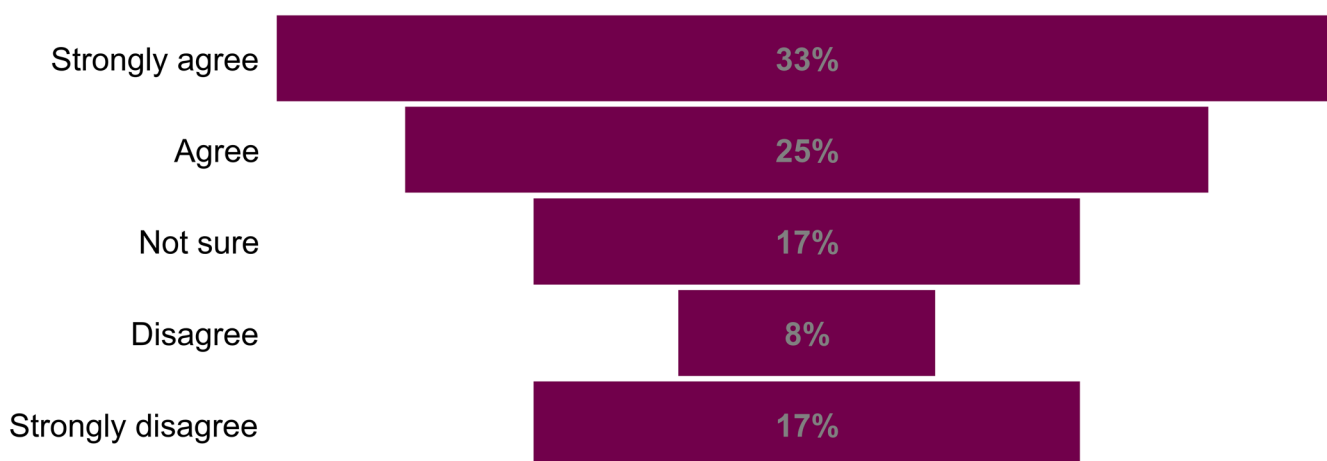
- The main reasons Candidates gave for discontinuing were:

  - process too time consuming.
  - unrealistic/too tight timescale for providing information.
  - conflict with work commitments.
  - access/unable to provide sufficient evidence due to changes in employer.

- If they were to apply for Accreditation through Earned Recognition again, the areas in which Candidates felt they would need additional support were:
  - clearer guidance on evidence requirements/information required to answer the questions.
  - longer Portfolio submission time and longer FIR deadlines.
  - questions relevant to the AL applied for.
  - consideration over access to evidence where ecologists had moved jobs.
- All but one respondent said that they would encourage their peers to apply for BER, commenting that in their opinion BER provides recognition of Consultants' 'bat skills', speeded up the licensing process and reduced costs for clients.
  - The explanation from the respondent who would not encourage their peers to apply for BER was that in its current form BER is not fit for purpose, and improvements were needed to avoid reputational risk to BER long-term.
- 57% agreed that their expectations of the process were met.
  - The remaining 43% disagreed commenting that the timescale and delays at each stage were an issue, exacerbated by poor communication from the BER PT.
- Of those asked, 100% answered 'Yes' to "Do you consider Bat Earned Recognition to be a positive step forward?"
- 75% said they were optimistic about the development and release of BER and 25% were not sure.
- The stage at which Candidates left the A&A process[12]
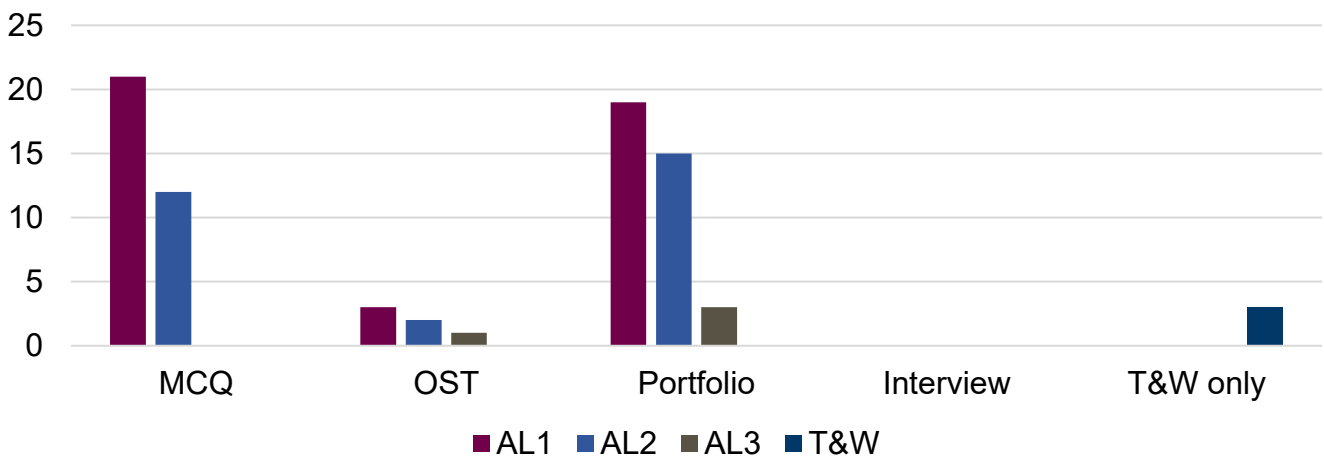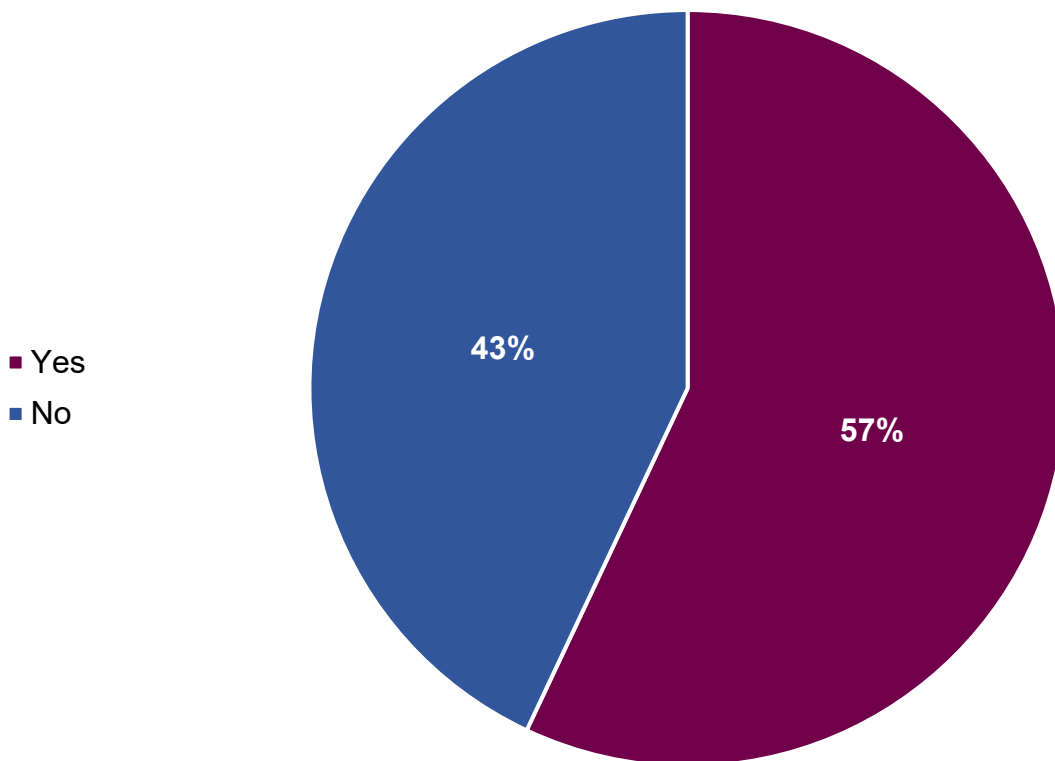

BER Project Team (QB7) only

Considering their work area:

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[12] At 13 October 2023

- The split of opinion on whether the onboarding of Assessors and Moderator was an efficient approach to recruitment (n=7)

- Suggestions as to how the onboarding process might be improved were to use a different recruitment agency and to ensure better communication between the agency and candidates.

- 100% respondents were of the opinion that the Assessor/Moderator training sessions were fit for purpose.
  - o Suggested improvements were for Assessors to carry out 'mock' OST and Portfolio assessments and follow up as a group to discuss the process and to provide support, guidance and feedback.

- The majority thought that the suite of guidance for Assessors and Moderator were fit for purpose.
  - o Improvements suggested providing clarification of what constitutes evidence, including evidencing continued professional development and being clearer about what information needs to be completed in the Candidate Assessment Form.
  - o It was recognised that the templates need to be further streamlined to prevent duplication of information.

- 100% agreed that the MCQ test was fit for purpose.

- BER PT opinion on whether the OST was fit for purpose (n=7)

Yes
No

43%

57%
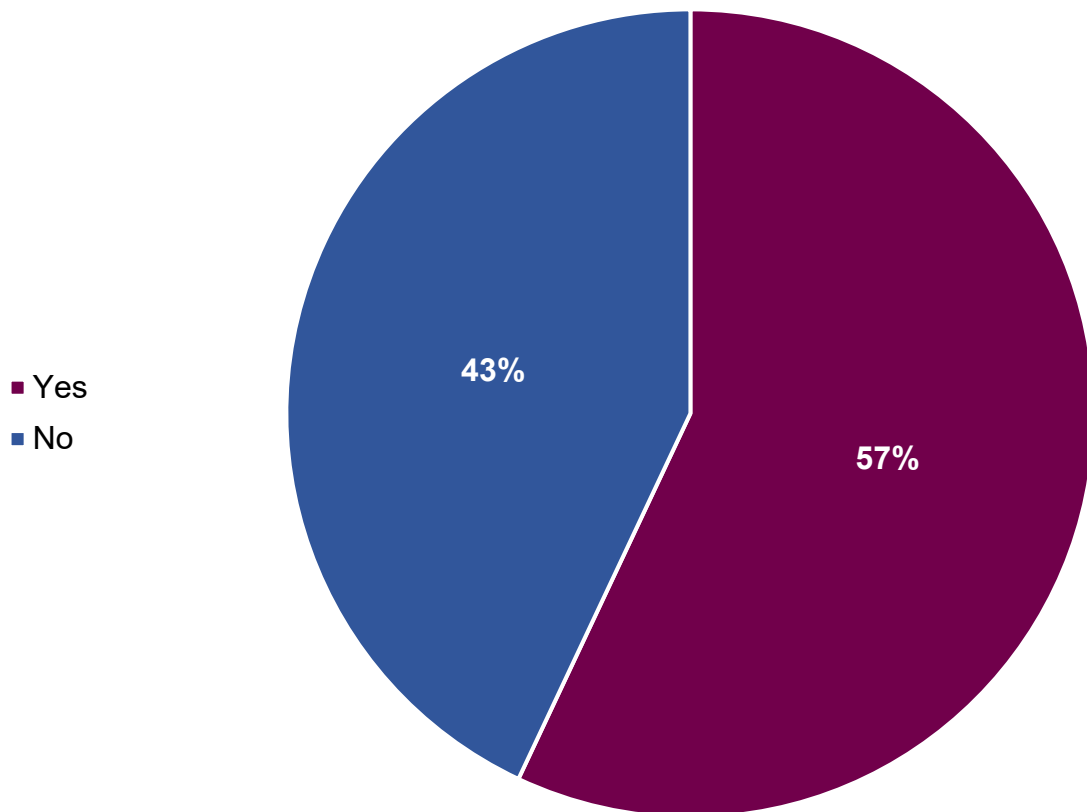
- The respondents who thought the OST was not fit for purpose suggested clearer wording and ordering of questions, better quality pictures and making the set up for marking easier/intuitive.

  - Additionally, errors in the online learning platform led to delays which could have been avoided with more time for testing.

- Most respondents thought the Additional Online Species ID Test was an effective way to test Candidates' knowledge and competence.

  - It was suggested that time to the project could have been saved by incorporating the AOSIT in the MCQ test, rather than having a separate test.

- The BER PT were split 50/50 on whether the Portfolio requirements were fit for purpose.

  - It was recognised that the Portfolio is too time consuming for Candidates to complete, and for Assessors to assess, and significant improvement is needed.
  - It was suggested that Candidates are offered a training session specifically on how to fulfil a Portfolio.

- Asked in their opinion whether the 'shift left' changes resulted in a more straightforward way for Candidates to evidence their knowledge, skills, judgement and competence 63% were 'Not Sure'. 25% said 'Yes'.

  - Those that answered 'No' thought that the changes led to required evidence being missed.

- Asked in their opinion whether the 'shift left' changes as a whole resulted in a more streamlined test of Candidates' knowledge, skills and competence the majority answered 'Not Sure'.

- o Those that answered 'No' thought that the changes led to required evidence being missed.

- 100% were of the opinion that the approach to interviews was fit for purpose.

- 75% thought that the current approach to decision review was fit for purpose. 25% were not sure.

- No one thought that the BER accreditation process could be done entirely in-house.

- Opinions on which aspects which should be done externally (n=8)

Lead Assessor & Moderator	37%
Portfolio	25%
Interview	13%
Portfolio & Interview	25%
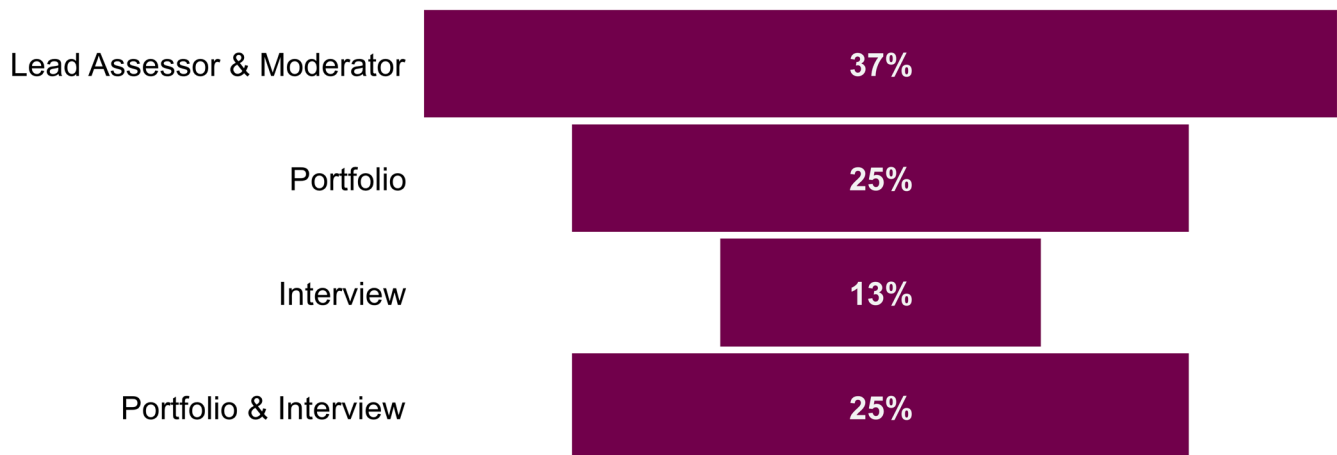
- Comments and suggestions on how Natural England might improve communications to enhance the experience of the BER Candidate were:
  - o Set more realistic timelines.
  - o Support Candidates with Portfolios and reduce email traffic through the provision of MS Teams sessions.
  - o More frequent communication/regular updates to Candidates needed.

- 83% thought that the Beta A&A Internal Guidance Notes (IGNs) were sufficiently detailed to cover all aspects of the Beta A&A process.

- Suggested improvements to the Site Registration process were continued development of the SDDS to enable a better customer journey for Site Registration, and a better system for data management for Natural England.

- 100% thought that both the BER Site Registration Assessment IGN and the Compliance IGN were sufficiently detailed and fit for purpose.

- 100% were of the opinion that the approach to BER compliance was fit for purpose.

- Long-term i.e., post Pilot/Beta, the predicted risks to the compliance side of BER were:
  - o Insufficient resource to maintain the required level of compliance checks/monitoring.
  - o The priority placed on BER delivery ongoing.
  - o Conflicting demand on resource leading to compliance being given a lower priority.

- Everyone who responded thought that the 'Interim IT' benefitted Natural England in terms of how it handles/processes and accesses casework.

- 100% thought that the level of risk to Natural England was adequately managed through the risk based assessment triggers on the SR form questions.

- 100% thought that the 'Interim IT' enabled Natural England to complete and record assessments of the licensing tests.

- The responses to whether the 'Interim IT' is sufficiently clear to track the status of cases from application/modification/resubmission, compliance monitoring and return stages (n=5)
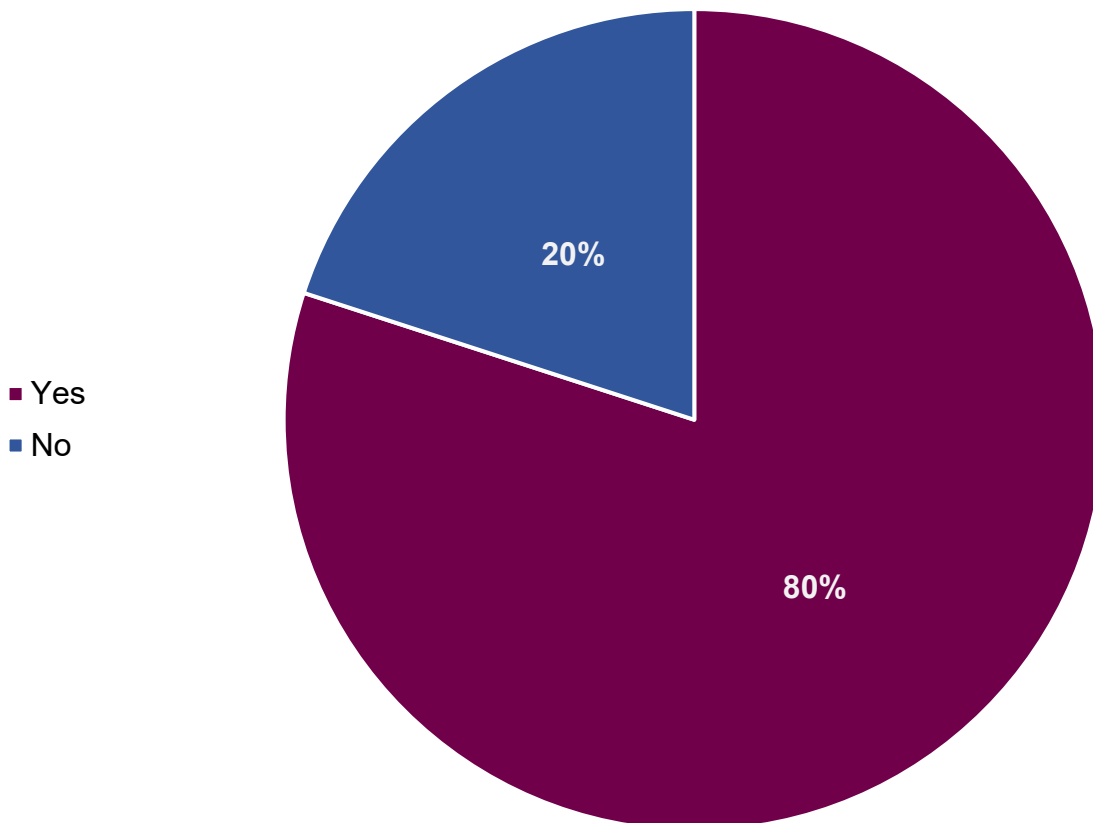
- Suggested ways to improve the system were instructions to the ER Consultant around the change to application, modification and resubmission to reduce errors, and an improved system for logging Compliance monitoring and returns to provide a clear audit trail of work done.

- Main risks to the delivery of BER as business as usual from the BER PT point of view were:

  - The uptake of future tranches, given the high 'drop out' rate - positive comms needed to boost public perception of the scheme.
  - Loss of ongoing external expertise and advice.
  - Insufficient resources for BER to continue to operate appropriately.
  - Compliance being sufficiently prioritised.
  - Demands/reallocation of funds will lead to a less robust assessment in future.

- The (significant) concerns about the roll out of BER as a whole were:

- o   ensuring dedicated resource and expertise for future rounds of accreditation.
- o   If brought in-house, A&A will not continue to be done at the current level, defeating the point of BER.

- Aspects that the BER PT thought worked well were mailbox management and the timely response to queries, the comprehensive guidance review and amended for Beta, how 'The Team' worked together, external moderation and Assessor input, and the streamlined Site Registration Form being positively welcomed by ER Consultants, enabling Natural England to focus on parts of an application where effort was required.

- Aspects that the BER PT thought did not work so well were compliance statistical monitoring and the delay to launch of SDDS SR, ER Consultants' understanding of the conditions of the Class Licence and how they should submit Site Registration requests and licence returns, dual assessment caused delays, and the overall requirements (CF, assessment strategy and Portfolio) need to be more stringent, better defined, and the process more streamlined.

Lead Assessor/Assessor (QB6)

- 78% Assessors thought that the initial Assessor/Moderator training sessions were fit for purpose. The remaining 22% would have liked more detail on how to use Moodle, worked examples and to have seen the A&A materials that were sent to Candidates.

- After initial training to become an Assessor/Moderator, the extent to which Assessors were confident that they understood all aspects of the Beta A&A process (n=9)

Legend:
- All aspects
- Most aspects
- Not sure

22%
11%
67%
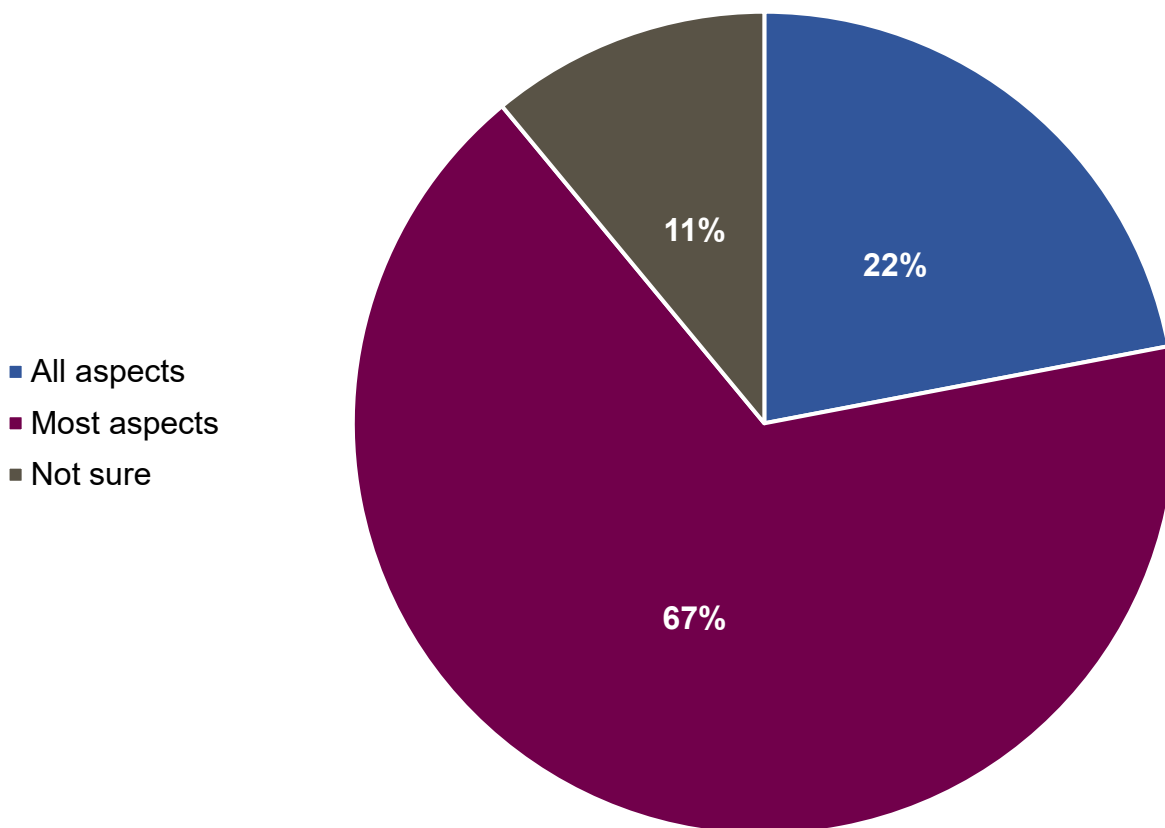
- Having completed at least one assessment the opinion that the Assessor/Moderator training sessions were fit for purpose was unchanged.

  o Half the Assessors said that having the A&A materials prior to training would have been helpful, although it was acknowledged that that was not possible due to tight review time between the end of the Pilot and the launch of Beta.

- Extent to which those who responded agreed that the guidance and communication about the remit of the Assessor was clear and fit for purpose (n=9)
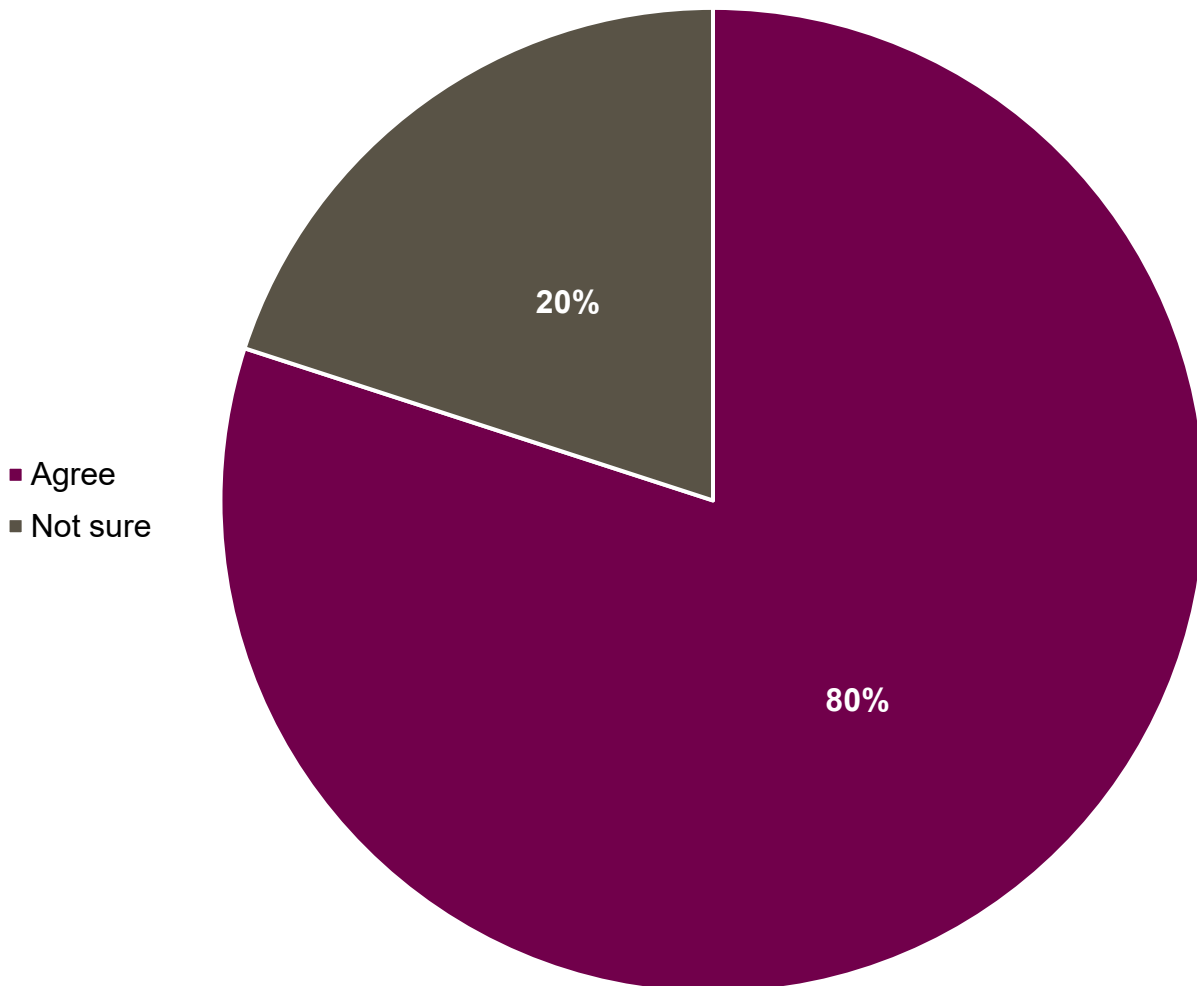
- 100% were of the opinion that the Assessor guidance on the process of the automated MCQ stage was sufficient.

- The majority of Assessors found the Assessor guidance on the process of OST assessment helpful.

- The main themes from Assessor free text feedback on the OST stage e.g., difficulties, improvements, aspects to retain/that were welcome were:

  o Clarity over recording OST scoring.
  o Poor quality photographs.
  o Flexibility to answers needs to be maintained as subject there may be a number of possible answers which adequately show knowledge and competence.

- o Poor wording of a number of questions that created confusion in answers.

- Where Assessors had viewed the Additional Online Species ID Test 80% were of the opinion that the photographs used showed the key features needed for identification (such as a bat in the hand, viewing a bat within a crevice, free hanging, via endoscope).

  - o 100% thought that the photographs in flight clearly showed the key features required for identification.

- Assessor opinion that the AOSIT was an effective test of a Candidate's knowledge, skills and competence in bat species ID in the field (using morphology) (n=5)

Legend:
- ■ Good test
- ■ Too difficult

(Pie chart: 60% Good test, 40% Too difficult)
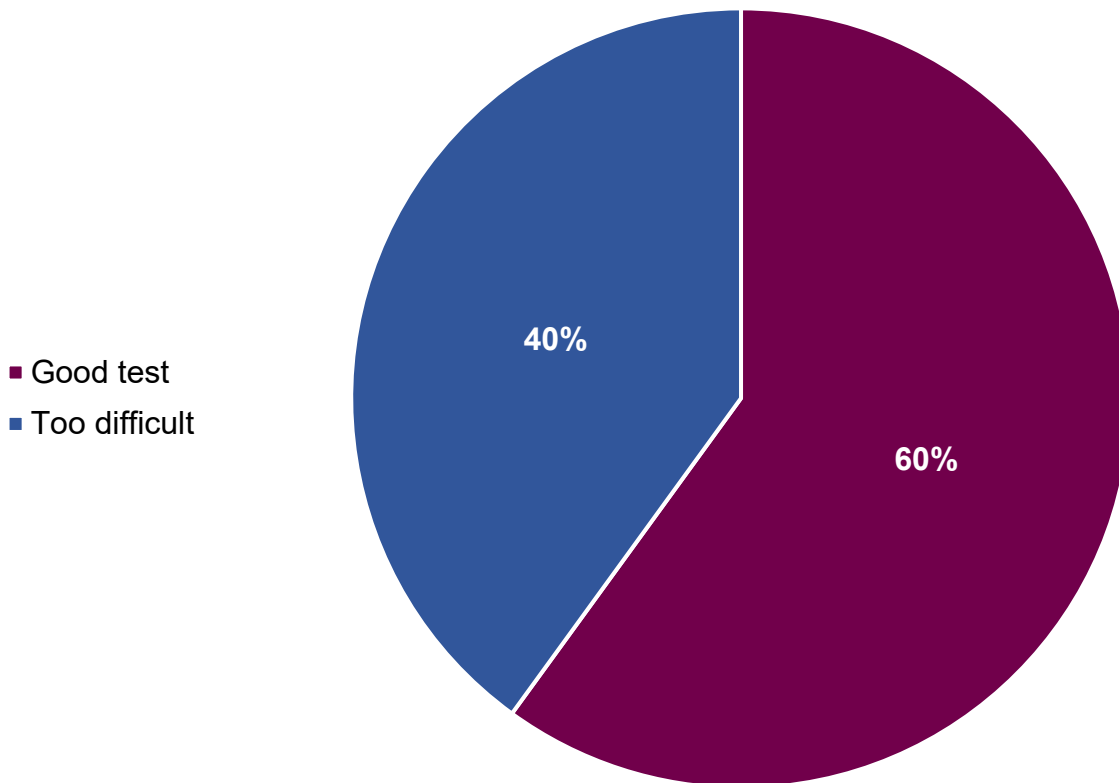
- 90% Assessors found the Assessor guidance on the process of Portfolio helpful.

  - o The remaining 10% found the delay in getting access to the Assessor Portfolio guidance unhelpful, and found the system for recording Candidate scores onerous.

- The split of Assessors who felt that the requirements and approach to providing evidence for the Portfolio appropriately demonstrated Candidates' competence (n=10)

Yes - appropriate	40%
Yes - but requirements seem excessive	30%
No - doesn't ask enough questions	10%
Other	20%
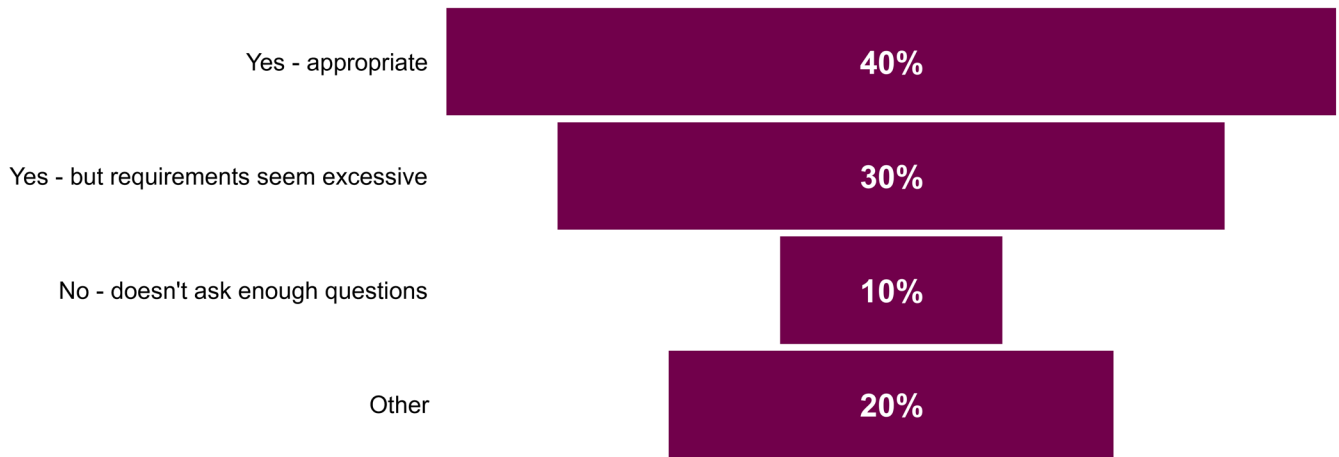
- o 'Other' comments were that the concept is sound, but some CIs are difficult to demonstrate.
- o Portfolio evidence diluted by the 'shift left' exercise led to evidence being inappropriately assessed at other stages.
- 80% Assessors felt that both the CF and CIs allowed Candidates to evidence their competence. 10% thought CI only.

- Suggested 'Other' ways Candidates might best evidence their competence were to "include (alongside CPD) minimum field survey hours (for different types of survey) that must be met to be accepted on the programme", allowing more detail and reasoning to be included, and request a log of licenced work as named ecologist or agent.

- The main themes from Assessor free text feedback on the Portfolio stage e.g., difficulties, improvements, aspects to retain/that were welcome were:

  - o Some CIs were not applicable to sole/small businesses.
  - o Too much overlap on CIs.
  - o Improve the guidance to enable Candidates to provide the right evidence.
  - o Identifying bats in flight is not a typical situation.

- The majority of Assessors found the Assessor guidance on the Interview process helpful.

- The extent to which Assessors agreed that the interviews they held were a useful exercise in capturing a Candidate's competence (n=7)

- Strongly agree
- Agree
- Not sure

43% (Strongly agree)
43% (Agree)
14% (Not sure)
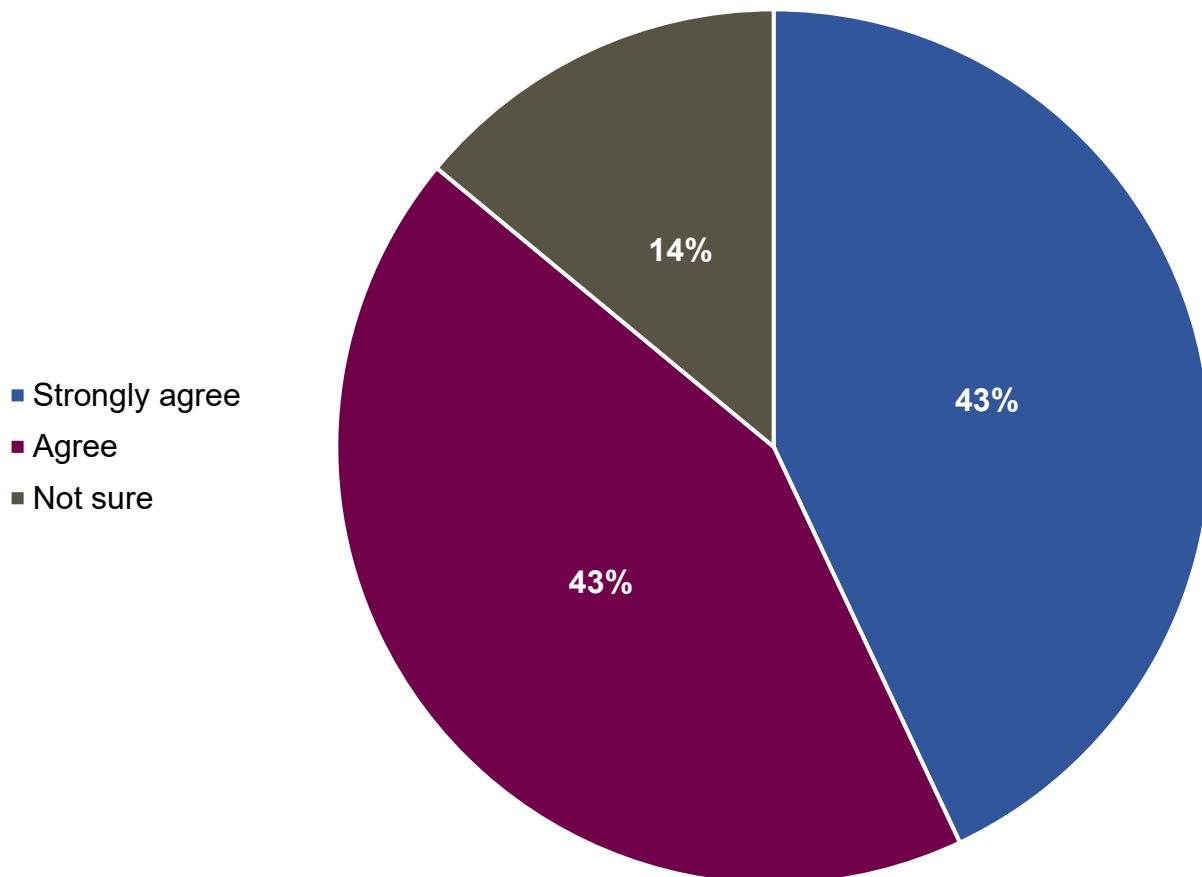
- 44% Assessors agreed that they were able to use their own experience and judgement to ask additional questions during the Candidate interview.

  - 44% felt that having to tailor the questions to match the CIs made it difficult to explore wider knowledge. 12% were 'Not sure'.

- Suggested improvements from the Assessor free text on the Interview stage were:

  - Refine the system for booking interviews.
  - Assessors test and refine interview questions to ensure they are fit for purpose.
  - At interview use the same wording for questions on competencies as written in the Interview guidance.

- 89% Assessors were of the opinion that the assessment process was an appropriate and robust test of Candidates' competence.

  - The other 11% thought that the 'shift left' exercise made the assessment an unsuitable way to test Candidate's competence.

- 38% Assessors agreed that each stage of their assessment(s) took them an appropriate amount of time to complete. 24% were 'Not sure'.

  - The 38% who disagreed said that whilst no individual Candidate took the same amount of time, the submission of poor evidence and many FIRs increased their assessment time.

- 88% Assessors found the Candidate Assessment Form easy to use.

- The remaining 12% found the system for marking and recording 'clunky'.

- Whilst the majority of Assessors thought the Candidate Assessment Form an appropriate way to capture Candidate information, it was suggested that fields that auto populated would be helpful, and save time.

- 75% thought that the Candidate Assessment Form was comprehensive enough to capture Candidate information.

  - The 25% who did not find Candidate Assessment Form comprehensive enough to capture Candidate information thought that additional comment boxes to record rationale or concerns would be beneficial, as would a list of portfolio documents available to view.

- The main themes from Assessor free text feedback on the BER assessment and accreditation process overall e.g., difficulties, improvements, aspects to retain/that were welcome were:

  - Timing and delays to the process were difficult to fit around work commitments.
  - It was not clear where to record FIR details.
  - Better communication with/from the BER PT.

- 88% respondents were Assessors under the 2021/2022 Pilot process.

- The extent to which Assessors agreed that the assessment process for Beta was more streamlined than for the 2021/2022 Pilot process (n=7)

- Beta more streamlined
- Beta less streamlined
- No noticeable difference

29%

57%

14%
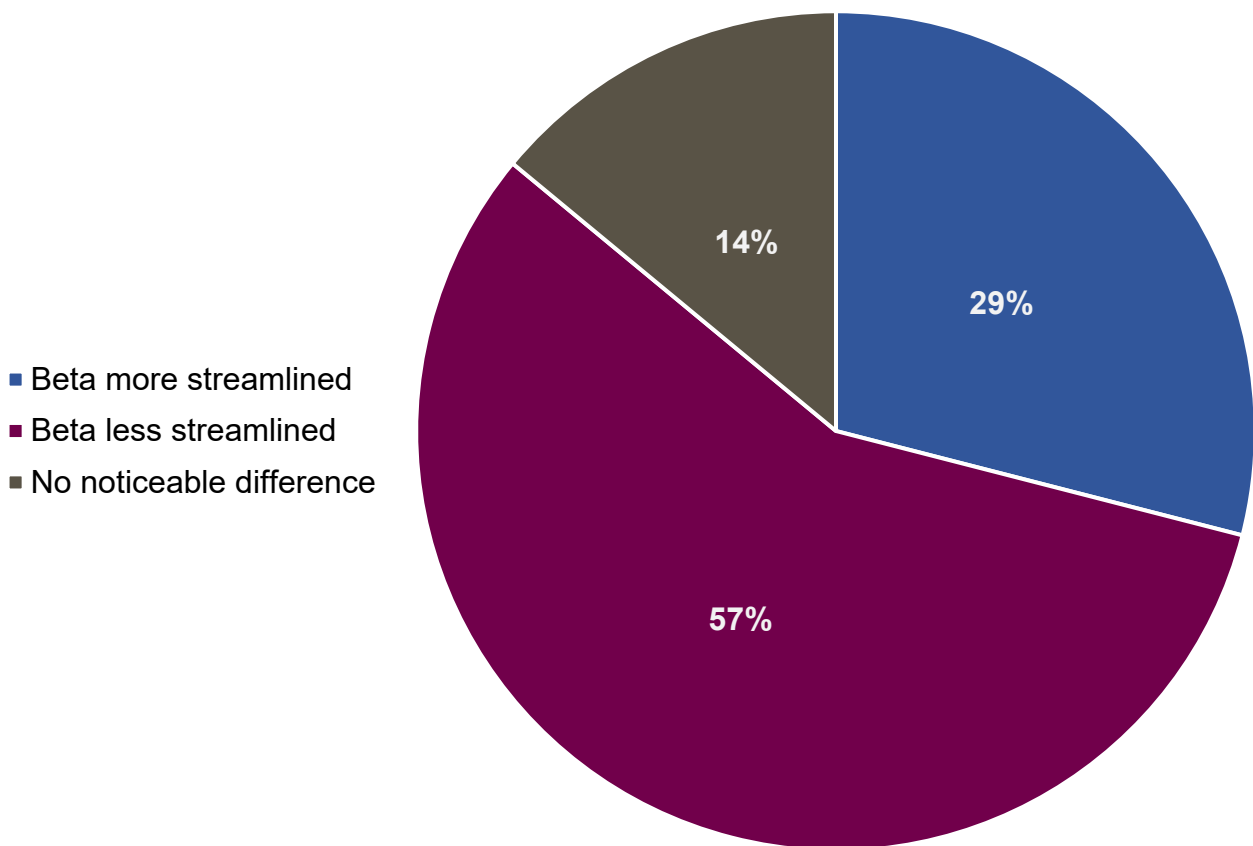
- 86% thought that the online element of the Beta assessment process was an improvement on the 2021/2022 Pilot.

  o Those that did not see the online element of the Beta assessment process as an improvement on the 2021/2022 Pilot thought that the Assessor feedback from the Pilot had not been considered for Beta.

- 57% Assessors were satisfied with the level of Assessor involvement in the review/improvement of assessment materials for Beta.

  o Reasons why the remaining 43% were not satisfied were that there was not time to conduct a proper review and make the necessary adjustments before the launch of Beta and that feedback from the Pilot had not been considered for Beta.

- Most agreed that measures were in place to ensure no conflict of interest (COI) arose between Candidates and the Assessor(s).

- Assessors were spilt 50/50 in their opinion that the Assessor remit needed improvement and/or additional safeguards, to ensure an appropriate, fair, and consistent approach.

  o Suggestions for improvements were to have one Lead Assessor who dealt with more 'typical/routine' licensed work, make all assessments dual assessments and build on time for a level of QA to ensure consistency.

- Suggested improvements to the Assessor role/process, towards further improving the scheme were:

  o A commitment from Assessors to complete a certain number of hours/cases.
  o Fewer dual assessments to speed up the assessment process.

- With regard to further development of the scheme, aspects which Assessors felt would benefit from greater Assessor involvement were:

  o Development of interview questions.
  o Consider accepting older reports for AL3 or allow flexibility with otherwise strong Portfolios.

- 88% Assessors agreed that their expectations of the Assessor role were met.

- Aspects of the BER process which did not work well for 88% Assessors were:

  o Timing and many delays to the process.
  o The quality of evidence submitted was challenging to assess.
  o Limited support from the BER PT, and no way to speak to someone when there were technical issues prior to interviews.

- The extent to which Assessors agreed that the guidance and communication about the remit of the Beta Moderator was clear and fit for purpose (n=8)
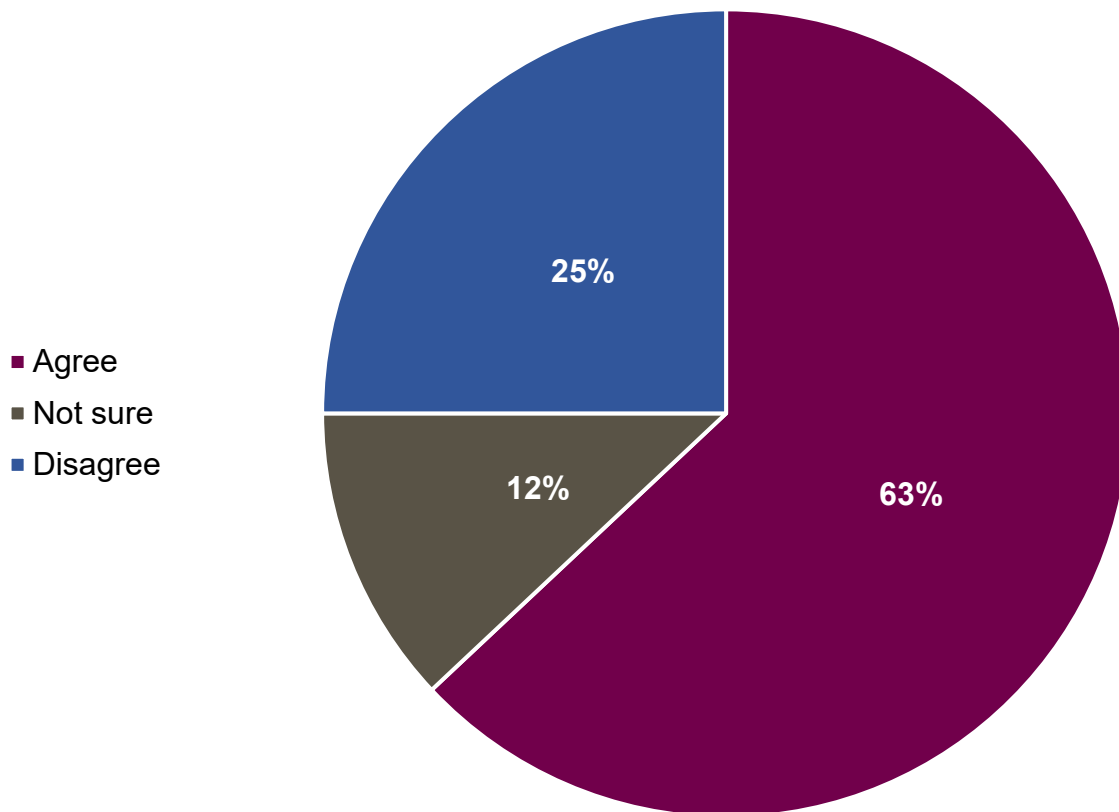
- 63% thought that the Beta approach to moderation enabled the Moderator to carry out a robust and evidence-base assessment.

  o The remaining 37% either had no contact with the Moderator or thought their contact with the Moderator was poor.
  o 63% thought their communication with the Moderator was satisfactory.

- 50% of Assessors thought that the Beta Moderator remit needed improvement and/or additional safeguards, to ensure an appropriate, fair and consistent approach. Improvements suggested were:

  o The Moderator should communicate more with Assessors.
  o Moderator should have experience of licensable bat work.

- 63% supported having more than one Moderator in place to provide additional support to Assessors and speed up decision making.

- 12% respondents were Lead Assessors.

- Of the 75% respondents who carried out dual assessments, 83% felt that they worked well with their dual Assessor.

  o Aspects of dual assessments that did not work well were different assessors completing Portfolios at different times and no opportunity to compare FIRs and non-standard questions.

- Assessors agreed on the outcome of their dual assessments in all but one case.

- Where the Assessors did not agree on the outcome, the assessment was referred to the BER PT, and were subsequently satisfied with the final decision.

- Elements of the online assessment process that worked well for Assessors were the OSTs and the online Candidate system.

- Elements that did not work well for Assessors were timescales and delays made it difficult to juggle work commitments, and working in isolation with no opportunity to talk to other Assessors.

- 67% Assessors considered the communication with Natural England throughout their involvement with Beta to be satisfactory.

- Suggestions from the 33% who disagreed suggested more updates would be helpful, and having a contact telephone number for the BER PT for when issues arose.

Tree and Woodland Annex Assessor (QB11)

- 100% thought that the Annex Portfolio template was sufficiently clear about the evidence required of Candidates.

- 100% were of the opinion that the Annex Portfolio template was sufficiently detailed to enable Candidates to demonstrate their competence.

- The Assessors were evenly split in their opinion that the Candidates they assessed applied for the correct AL for their level of competence (n=3)

Legend:
- All applied at the correct AL
- Most applied at the correct AL
- About half applied at the correct AL level

Pie chart values: 33%, 33%, 33%
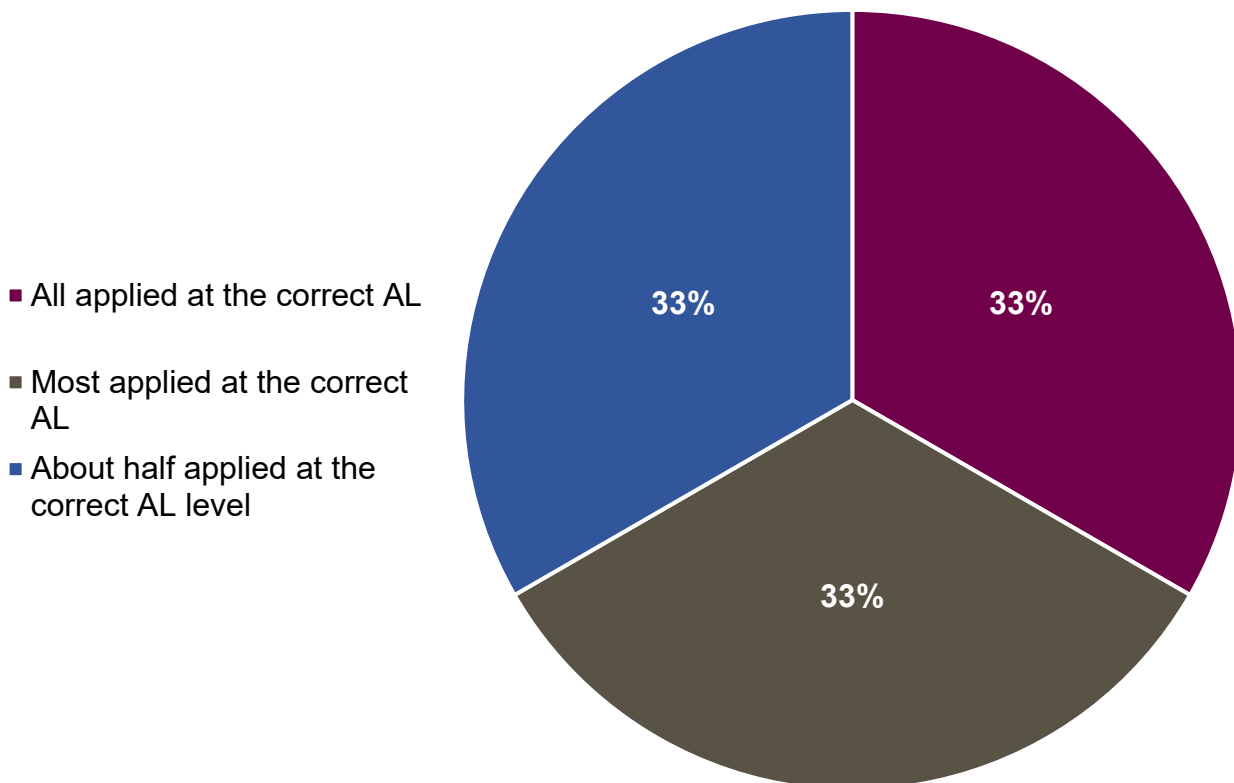
- 100% felt that the requirements for providing evidence for the Annex Portfolio appropriately demonstrates a Candidate's competence.

- The Assessors who had held interviews all agreed that the Interview was a useful exercise in capturing a Candidate's competence.

- Every Assessor found it 'Easy' to use the Candidate Assessment Form.
  - All agreed that the Candidate Assessment was an appropriate way to capture Candidate information.
  - All agreed that the Candidate Assessment For was comprehensive enough to capture the required Candidate information.

- 100% Assessors agree that measures were in place to ensure no COI arose between Candidates and Assessors.

- 100% found it 'Easy' to apply a consistent approach across all their assessments.

- 66% Assessors took 5-10 hours to complete all their T&W Annex assessments. It took 34% 10-20 hours.

- Assessor comments on the T&W Annex assessment overall were that some Candidates misunderstood that every piece of evidence needed to be tree and woodland specific.

Moderator (QB9)

- Whilst the guidance and communication about the remit of the Lead Assessor/Assessor role was clear and fit for purpose, it was suggested that Standardisation would help assessors understand the assessment/Lead assessment role better.

- Asked if the guidance was clear enough to ensure Lead Assessors/Assessors were consistent in their decision making, the Moderator thought that the changes made, and clarification provided, throughout the Beta accreditation period had helped. Also, the catch-up session with the Assessors had been a useful way to resolve queries.
  - A rigorous standardisation process before each accreditation window would ensure a more appropriate, fair and consistent approach.

- Future adjustments to the CF are needed to help avoid misinterpretation of the Technical Competencies and help to ensure Assessors carry out robust consistent and evidence-based assessments.
  - Removing the overlap between some of the CIs and evidence requirements would streamline processes and further ensure a consistent approach.

- The Moderator was of the opinion that the assignment of Candidates to Lead Assessors/Assessors was fair, ensuring no COI.

- The Moderator highlighted inconsistencies between assessor marking across their assessments and, as a result, changes were made to tighten up evidence requirements for some CIs.

- With regard to further improving the Lead Assessor/Assessor role/process the Moderator suggested Assessors should attend a standardisation meeting and more targeted assessment training using worked examples.

- The Moderator was of the opinion that the guidance and communication about the remit of the Moderator role was clear and fit for purpose.

- The Moderator agreed that the BER approach to moderation enabled then to carry out robust reviews, to ensure Lead Assessors/Assessors carried out robust, evidence-based assessments.

- It was suggested that if an initial standardisation and feedback process was implemented, the Moderator's role would be clearer to Assessors, and it would help to re-enforce the role that the Moderator plays within Assessor support.

- The Moderator role is important because assessment processes require an element of moderation in order to ensure consistency between assessment decisions. To ensure that the same judgements are applied equally across the board continued moderation was needed.

- Asked what form/scope of continued moderation might be appropriate the Moderator suggested:

  o The Moderator should be involved within initial standardisation to ensure that all assessors (and Lead Assessors) are following and assessing to the agreed standard.
  o Thereafter, the role is to ensure fairness and consistency throughout the assessment process.
  o The Moderator should ensure that interviews are being conducted appropriately, using suitable Non Standard Questions that are rigorous enough to satisfy the CI.
  o The Moderator should also support the Assessors in judgements where needed or advise against decisions made that may jeopardise fairness or consistency of the assessment processes.

- The Moderator agreed that if differences of opinion occurred there was a consistent and effective process for escalation and resolution.

- One Moderator should be sufficient, if standardisation is carried out robustly enough, to streamline assessment processes and avoid the need for lengthy discussions, reviews or further moderation.

- There were no COIs between the Moderator and candidates in Beta. However, measures need to be in place in future accreditations to ensure no COIs if a bat ecologist is chosen to moderate.

- The Moderator was of the opinion that the QA process allowed for the Lead Assessor/Assessor, BER PT, and where required the Moderator, to concur with accreditation recommendations in most cases? (dispute over outcome).

- The Moderator was provided sufficient technical support from Lead Assessors when requested, but would have benefitted from clearer and quicker routes to answers/decisions.

- It was felt that not all the Assessors were clear on the non-technical role. Being involved in the initial standardisation process may have helped overcome that.

- Not having taken part in the Pilot it was difficult for the Moderator to comment on what Assessors understood the Moderator role to be during the Pilot A&A process.

Annex 2 Summary of responses to Site Registration questionnaire (QB10)

The BER Beta Site Registration questionnaire asked questions covering:

- The Licensing Process
- Site Registration materials
- Maintaining and raising professional standards
- Licence Return Form

In January 2023, ready for the launch of the Beta Phase of the new BER online Licensing Process, QB10 was sent to all 57 ER Consultants ('Consultants') to get a snapshot of progress made in the development of the BER Licensing process. 24 responses were received by the closing date 31 May 2023.

It should be noted that not every participant answered every question, or the requests for an explanation.

- Number of Consultants who are also a BMCL Registered Consultant (n=24)

46%

54%

- Yes
- No
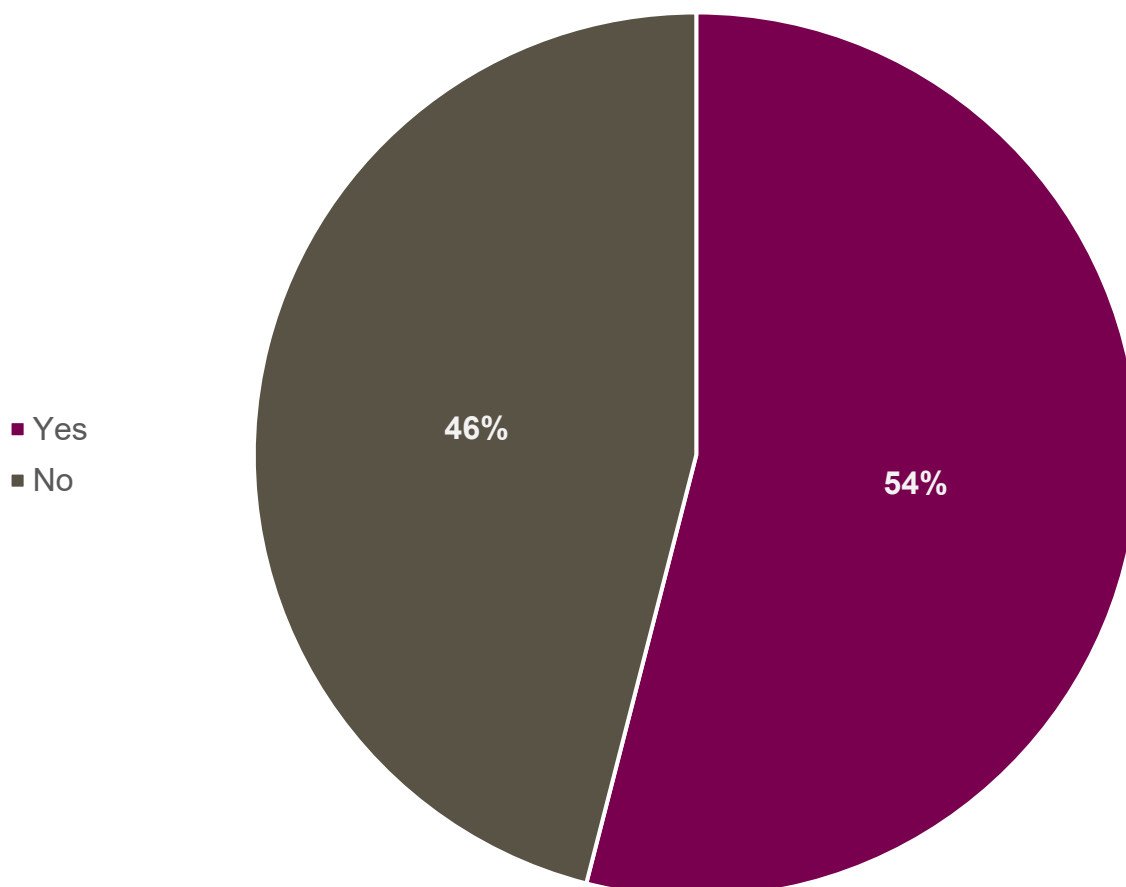
- Asked if they thought that the BER SR online digital system was more streamlined than the BMCL application process:
  - 38% BMCL Registered Consultants said 'Yes'. Reasons why were less paperwork, shorter waiting time for a decision, the online application was easier to work through than forms, and only necessary/relevant information was required at AL1.
  - Reasons why 31% thought the BER SR online digital system was less streamlined than for BMCL were that the process was time consuming and repetitive, and needed more detail than a BMCL registration.
  - The remaining 31% answered 'Not sure'.

- Asked if they thought the process of submitting BER SR documentation online reduced the application time compared to BMCL SR applications 69% said 'No'. The other 31% said 'Yes'.

- 31% Consultants applied for BMCL case(s) between 1 January and 31 May 2023.

- Asked what would incentivise them to use BER over BMCL or individual mitigation licences, Consultants said offline forms, a bigger document upload limit and being able to save data online and return to work on the BER SR later.

- In response to the question "Why was the BMCL preferential?" half the Consultants said familiarity with the process. The other half said they used BMCL to keep familiar with the system, and less confident in being able to save data on the BER SR platform.

- Consultants who responded said they saved between 1.5 – two hours using BMCL versus a Bat ER AL1 case submission.

- 100% respondents agreed that the process of submitting BER SR documentation reduced the application time compared to Bat EPS-MIT individual licence applications (not including the time applying to be Accredited).

- 100% Consultants felt that the online process of submitting BER SRs was sufficiently simple to understand due to good guidance documents, good communication and simple forms with the requirements clearly stated.

- The number of BER SRs (excluding modifications and resubmissions) Consultants submitted between the launch of the Beta Phase of the Licensing on 1 February 2023 and 31 May 2023 (n=24)
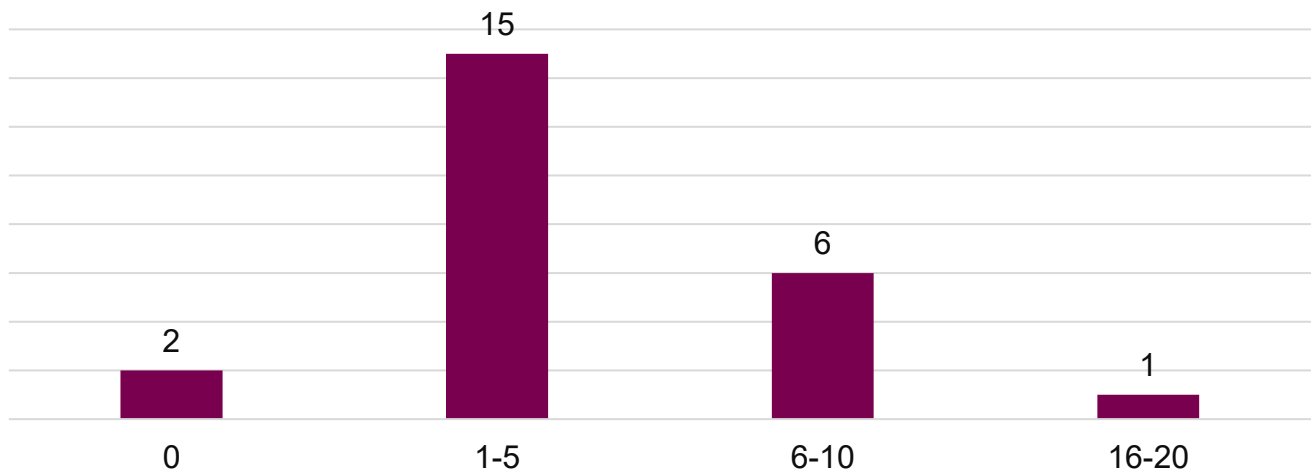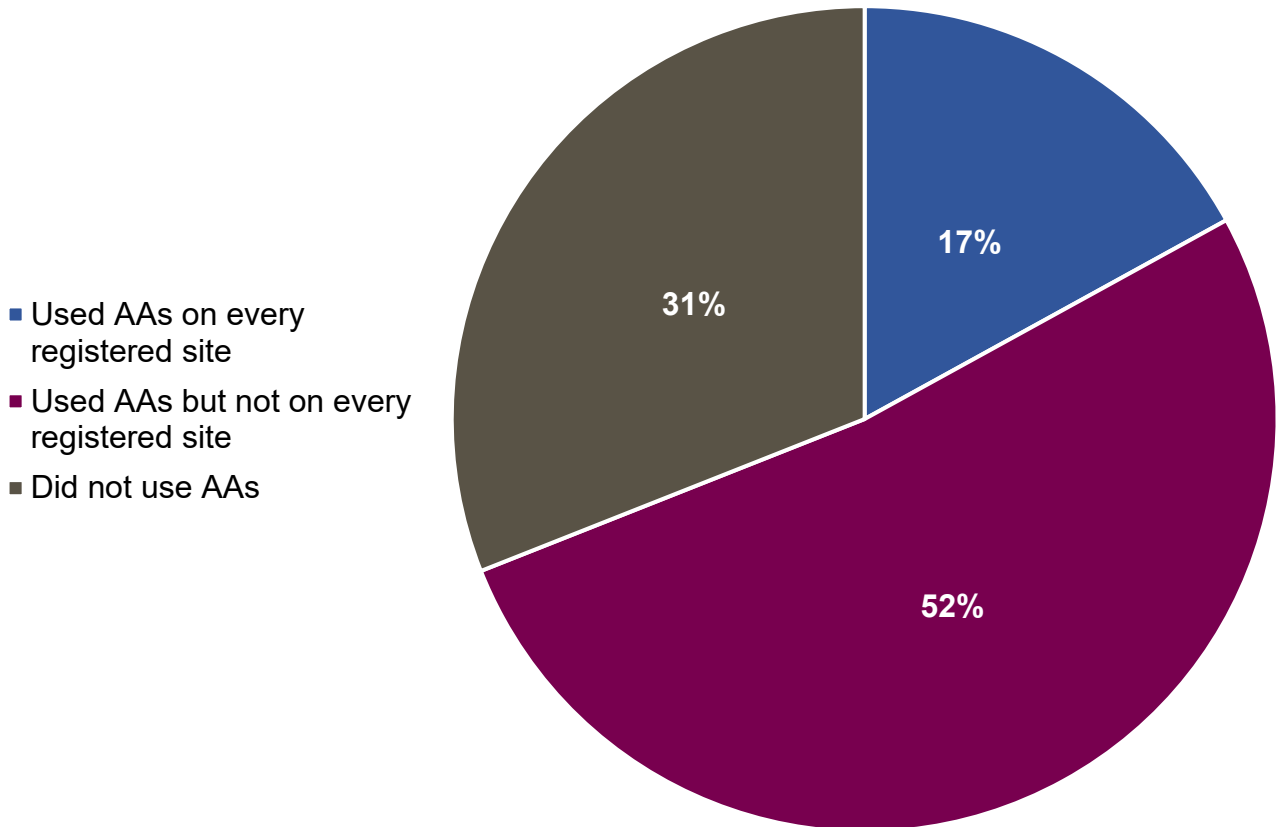
- The Consultants who did not submit any BER SR requests did not have any applications to submit, or used the current systems preferred by their clients.
- Of the reasons why Consultants were prevented from submitting more cases through the BER SR process, 54% did not have any further sites requiring a mitigation licence, 38% were not accredited at the required AL (so used current licensing routes) and the rest were already committed via client/contract agreement.
- 13% Consultants experienced a delay with the BER Licensing Process.
- 52% Consultants received non-technical feedback on how to improve the way they input SR data, and all agreed that the feedback they received was helpful.
  - 87% found the non-technical feedback helpful, 8% found the feedback unhelpful.
  - The rest were 'Neutral'.
- 96% Consultants were happy with the time between the date of submitting the SR Form and the date they received a decision.

  - The 2% who were not happy said that the guidance did not make clear that FIRs would re-start the turn round time and delays due to issues on site.

- 87% felt that the Site Registration Form was a positive step forward with reduced paperwork, no compromise in terms of bat mitigation and compensation, and reduced delays results in less negative perceptions about bats and licensing among the reasons given.
- Asked "Who did the bat surveys that supported your SR requests?" (n=23)

- Personally involved in the surveys in most instances
- Used survey data completed by other bat ecologists in most instances
- Other

48%

35%

17%
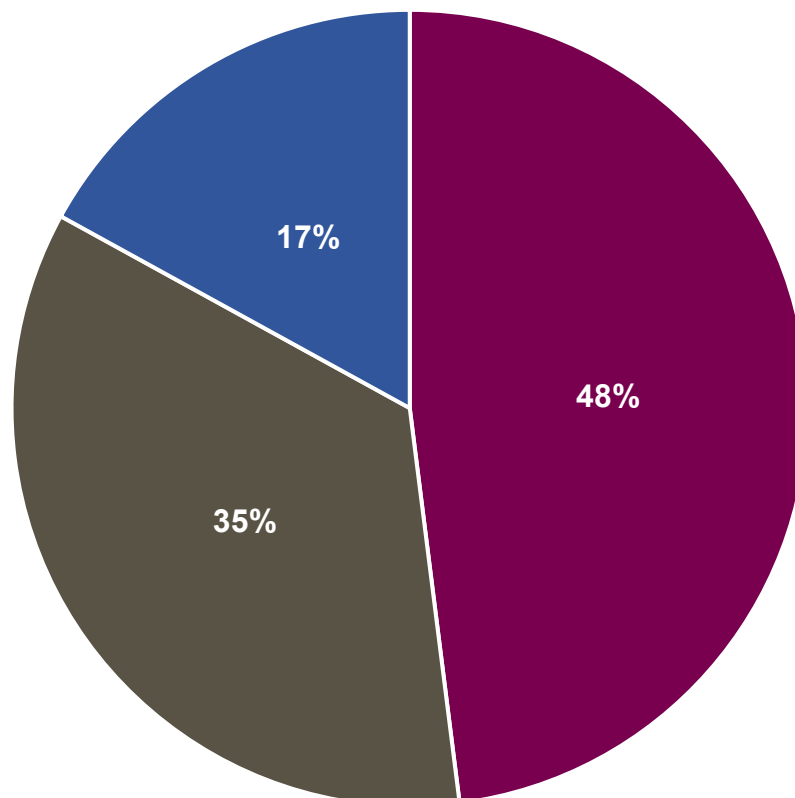
- o Those who said 'Other' did a mix of the two.

- 57% did not have to modify any of their Site Registrations.

  - o 54% had no licensable works/ activities that needed changing.
  - o 46% said the licence was flexible enough.

- Of the 43% of Consultants who did have to modify Site Registrations, compared to BMCL/Bat EPS-MIT individual licence modifications, 90% found it easy to request the change(s).

- The majority of the 39% Consultants who had to resubmit Site Registrations found the resubmission(s) easy to do (89%).

- 100% proposals complied with 'Minimum Expectations'.

- 70% Consultants needed the 'Minimum Expectations' guidance document when creating their mitigation and compensation plans for site registrations.

- Everyone found the 'Minimum Expectations' document either "Extremely reasonable" or "Somewhat reasonable".

- 78% Consultants needed the 'Bat ER (Pilot) Overview for ER Consultants (CL47Guidance01)' document when using the SR online form for BER Site Registrations.

- o 100% found the CL47Guidance01 document helpful.

- 96% agreed that the suite of guidance documents relates to the Licensing Process was sufficiently clear and fit for purpose.

- The use of Accredited Agents (AAs) to undertake licensed actions on registered sites (n=23)

Legend:
- Used AAs on every registered site
- Used AAs but not on every registered site
- Did not use AAs

Pie chart values: 17%, 52%, 31%

- 17% were in favour of AAs being required to demonstrate competence through a dedicated accreditation process, as opposed to the ER Consultants determining what an AA can undertake.

  - o Comments in favour said that ER is a rigorous process so it would not be fair for other people to then be allowed to do the work. However, it would help ease workload for companies that do not have enough in house ecologists to carry out the work.

- The 44% who were not in favour of AAs being required to demonstrate competence through a dedicated accreditation process, as opposed to the ER Consultants determining what an AA can undertake felt that BER consultants should be trusted to decide who to use as AAs.

- 39% were 'Not sure' whether AAs should be required to demonstrate competence through a dedicated accreditation process.

- With regard to the changes and flexibility of Appendix II, the split of ER Consultants who have relied on Appendix II instead of being sure of the impacts (n=23)

- Yes
- No

22%

78%
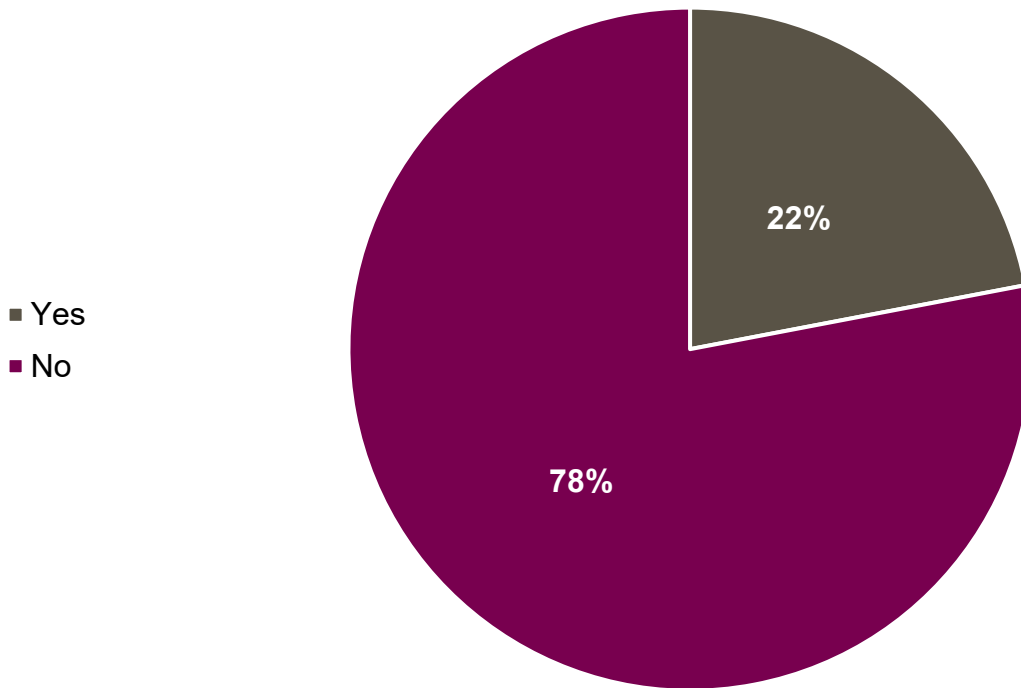
  o 100% of those that applied it felt that they had applied Appendix II appropriately.

- 83% completed and submitted the Licence Return Form for each site in accordance with licence conditions.

  o The 17% who did not, said the licensed activities were not finished.

- Recognising that a Monitoring Report Form must be submitted following completion of any monitoring (and therefore often over a year after initial impacts), 70% felt that the Licence Return Form was an appropriate way to capture whether their compensation/mitigation had maintained or improved the Favourable Conservation Status on site.

- Percentage of Consultants who are aware of the planned increase in compliance checks (n=24)
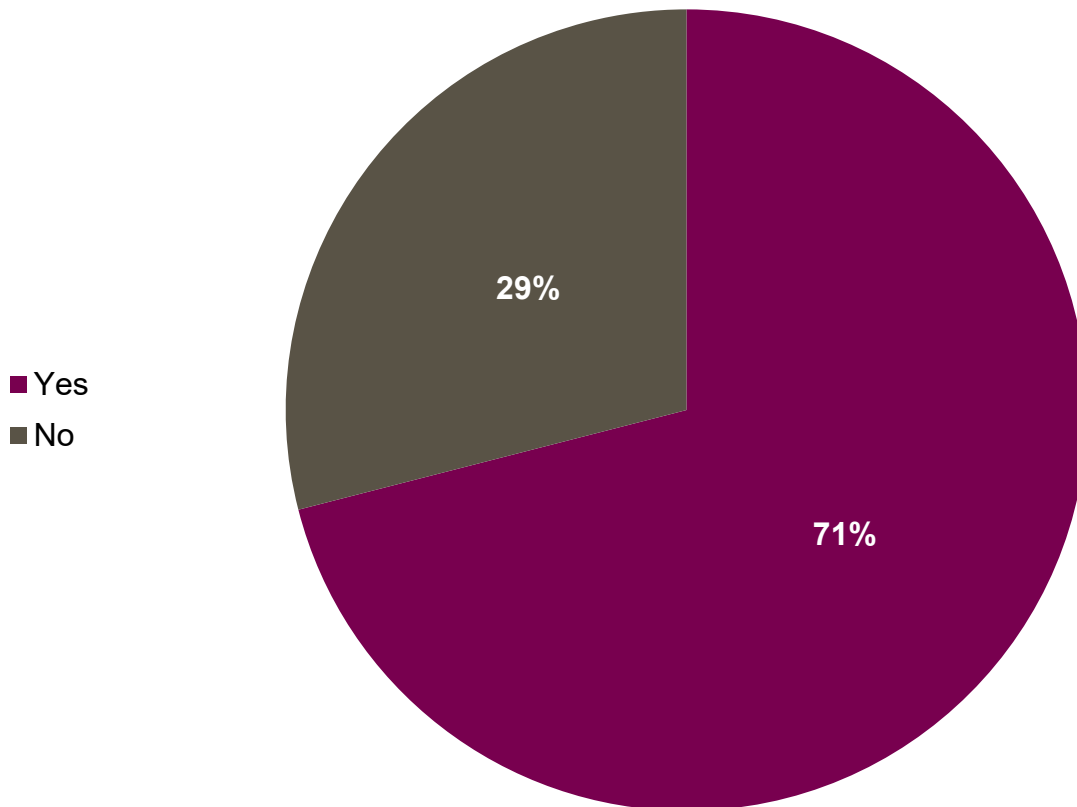
- 58% Consultants believed that BER will increase compliance with best practice, commenting that the "*use of the minimum guidelines will force ecologists to comply*" and that the thorough process to become Accredited would help to ensure best practice.

  o 17% thought not and the remaining 25% were 'Not sure'.

- 79% Consultants thought the BER Licensing Process sufficiently robust to ensure that only suitably competent ecologists are accredited, given the "*extremely rigorous*" and *"very robust"* accreditation process to become an ER Consultant.

- 83% Consultants agreed that the BER Licensing Process has the ability to maintain and/or improve outcomes for bats.

- 92% Consultants agreed that the BER Licensing Process has the ability to streamline applications and assessments.

- 96% Consultants agree they fully understand all aspects of the Licensing Process for BER. The rest were 'Not sure'.

- 100% Consultants felt that their knowledge and understanding of applying for Bat EPS-MIT individual licences assisted them in applying for and understanding the Bat ER Class Licence conditions.

- Percentage and type of SR process training Consultants would have found helpful (n=22)

Legend:
- Online pre-recorded webinar
- In-person training event
- More written guidance

(Pie chart values: 59%, 27%, 9%)
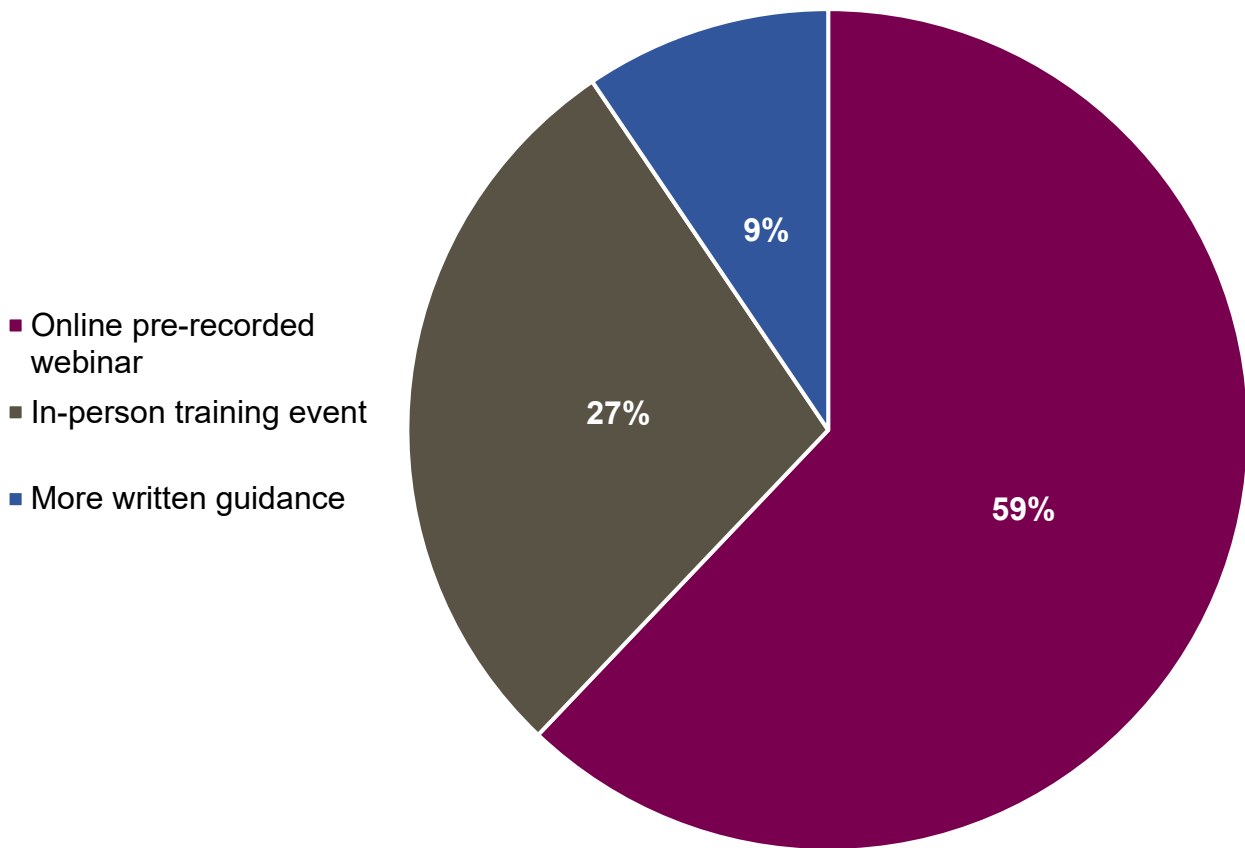
- o A Q&A/FAQ forum where people can ask questions about specific scenarios and learn from each other was also suggested for training.

- o 86% were optimistic about the further development and release of BER. The other 14% were "Not sure".

- Consultant satisfaction with the standard of communication with the BER PT in regard to SRs (n=22)

Very satisfied	50%
Somewhat satisfied	45%
Very dissatisfied	5%
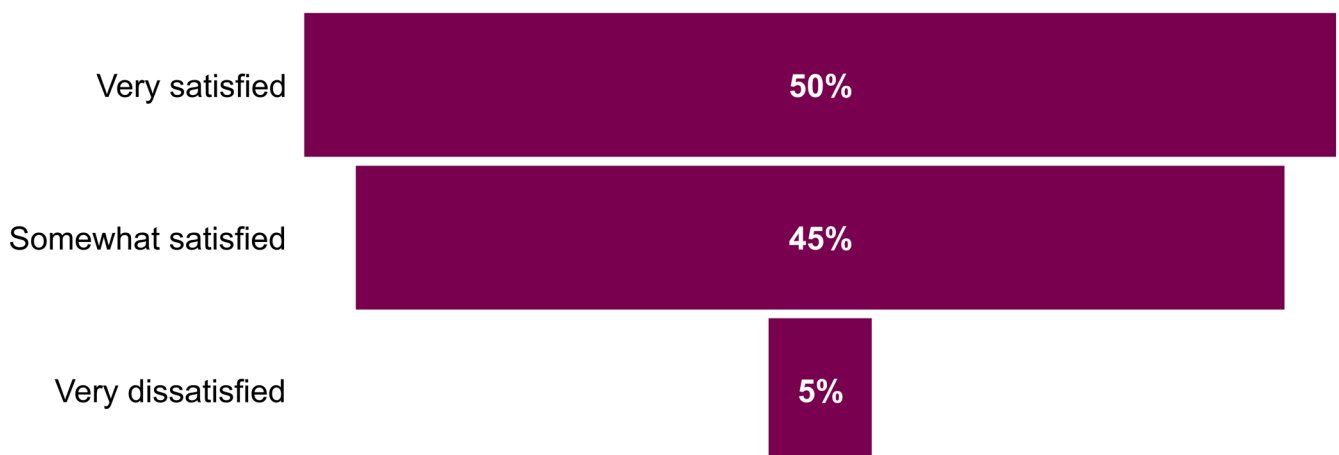
- o Suggestions on how Natural England might improve communications to enhance the ER Consultant experience included: contact by telephone for queries that needed a

quick response, earlier communication on extension dates and the licensing period and a BER web page with all relevant updates/information.

- Suggestions on what information should be asked of ER Consultants (post development) relating to the success of the compensation/mitigation measures were photographic evidence of the bat replacement roost and DNA if droppings are present, longer periods of post-work monitoring and feedback on what went wrong and/or what could have been done better.

Annex 3 Bat Earned Recognition Beta – Comparison with Current Processes

Table 1 Comparison of the average time taken by Natural England staff to assess and process current BMCL and Bat EPS-MIT casework* versus BER Site Registrations**

Current system	Staff process	Average time hrs	Bat Earned Recognition	Staff process	Average time hrs
BMCL (n=587)	Data processing	0.54	Accreditation Level 1 (n=96)	Data processing (n=51)	0.27
	Technical Assessment	1.24		Technical Assessment & Checks and Decision*** (n=88)	0.99
	Checks and Decision	N/A			
	Average hrs total	1.78		Average hrs total	1.26
	Full Time Equivalent (FTE) (n=100)****	0.14		FTE (n=100)	0.10
Bat EPS-MIT Low Risk**** (n=298)	Data processing	1.31	Accreditation Level 2 (n=50)	Data processing (n=25)	0.29
	Technical Assessment	3.07		Technical Assessment & Checks and Decision*** (n=48)	1.49
	Checks and Decision	2.24			
	Average hrs total	6.62		Average hrs total	1.78
	FTE (n=100)	0.52		FTE (n=100)	0.14
Bat EPS-MIT High Risk**** (n=479)	Data processing	1.19	Accreditation Level 3 (n=13)	Data processing (n=7)	0.30
	Technical Assessment	5.07		Technical Assessment & Checks and Decision*** (n=12)	2.17
	Checks and Decision	2.16			
	Average hrs total	8.42		Average hrs total	2.47
	FTE (n=100)	0.66		FTE (n=100)	0.19

* Based on 100 cases for each of the current processes at the times taken to process applications received 01/01/2023 – 31/05/2023

** Based on 100 cases at the times taken to process SRs submitted 01/01/2023 – 31/05/2023

*** 37% of total BER cases submitted required no assessment. 39% were targeted assessments and 24% flagged for full assessment.

**** One FTE = 170 DAYS – assuming 100% time spent on one category

***** With system updates we anticipate that in future, times and, therefore, FTE will be reduced for current processes

Evaluation Summary

- Based on current figures BER casework processing takes slightly less of the time taken for BMCL.
- Almost four times faster for Bat EPS-MIT Low Risk, and
- Over three times faster for processing Bat EPS-MIT High Risk casework.
- The situation whereby processing times for current systems are recorded as "*only what is reasonable*" to charge the customer and is not a true reflection of time spent assessing casework, remains the same.
- 46% of low risk BER casework was not flagged for targeted or full assessment, allowing resources to focus on higher risk cases and compliance.

Table 2 Comparison of the average time taken overall by ER Consultants to submit current BMCL and Bat EPS-MIT information against BER Accreditation Site Registrations

Current system	Consultant Average time hrs	Bat Earned Recognition	ER Consultant Average time hrs*
BMCL*	2.00	**Accreditation Level 1*** (n=96)	4.57
Bat EPS-MIT Low Risk**	9.25	**Accreditation Level 2** (n=50)	7.57
Bat EPS-MIT High Risk**	12.25	**Accreditation Level 3** (n=13)	10.96

*   Date range 01/01/2023 – 31/05/2023

**   From 48% ER Consultants (Pilot data. No update available for Beta)

***   Accreditation Levels used to enable broad comparisons

****   Times estimated based on ER Teams' previous consultancy experience (Pilot data. No update available for Beta)

Evaluation summary

- Whilst BMCL is a faster process for the Consultant, the level of risk is lower, and the extra time taken to submit a Site Registration is proportionate to the risk level.
- Data shows that BER processes saves the ER Consultant almost 20% over Bat EPS-MIT Low Risk casework submissions and over 10% versus Bat EPS-MIT High Risk submissions.
- Overall, BER is a faster process regardless of the risk level on the site.

Table 3 Comparison of the Accreditation preparation and assessment time for BMCL against BER (for both Assessor and Candidate)

Current System	Process	Average time hrs	Bat Earned Recognition*	Process	Average time hrs
BMCL Staff**	Consultant application assessment	11.25	BER Staff	Accreditation assessment	6.26
	Checks and Decision	7.50		Interview prep	0.25
	Average hrs total	18.75		Interview attendance and recording	1.75
	FTE*** (n=100)	1.47		Outcome Reporting, Checks and Decision	2
BMCL Consultant***	Application prep	3.90		Average hrs total	10.26
	Training attendance	15.00		FTE*** (n=100)	0.80
	Online Test Prep****	1.00	BER ER Consultant**	Portfolio prep	31.73
	Average hrs total	19.90		Interview attendance	1.44
				MCQ Prep*****	3.00
				OST Prep*****	3.00
				Average hrs total	39.17

*   Date range 09/02/2023 – 10/10/2023

**   BMCL includes a mandatory two-day training course for consultants. When required an average NE staff time of 3.75 hrs for course preparation & 15 hrs to deliver training (saving 0.01 FTE)

***   FTE based on 100 applications received and assuming 100% staff time devoted to processing applications

****   From 30% ER Consultants (Pilot data. No update available for Beta)

***** Online tests time limited

Evaluation summary

- BER is accessible to all bat consultants, without having to wait for enough interested applicants to allow a course to run, as with BMCL.
- Staff FTE for application processing is almost half that required for BMCL.

- Since BER allows ER Consultants to submit Low Risk and High Risk casework, which is not possible with BMCL it is, therefore, more sensible to assess a BER Candidate compared to a BMCL Candidate.
- Longer-term savings are expected on the realisation of the ambition that Natural England staff do all BER accreditations.
- BER application process takes a Candidate twice as long to complete but it allows them to submit Low Risk and High Risk casework, which is not possible with BMCL.

Table 4 Comparison between the number of Further Information Requests (FIRs) and Email signatures currently issued* and the BER process**, and the average time taken for assessment of each category

Current System***	FIR Number %	Withdrawn Number %	Email signature**** %	Average time (days) for all decisions	Bat Earned Recognition	Minor Amendment %	Withdrawn/ Revoked Number %	Average time (days) for all decisions
SR Decision					**SR Decision**			
BMCL (n=587)	3	1	4	9.8	**Accreditation Level 1** (n=96)	16	5	13.1
Bat EPS-MIT Low Risk (n=134)	1	20	18	46.6	**Accreditation Level 2** (n=50)	18	0	7.6
Bat EPS-MIT High Risk (n=203)	6	7	18	44.5	**Accreditation Level 3** (n=13)	31	0	2.0

*   Data range 01/02/2022 – 13/04/2022 (Pilot data No update available for Beta)

**   Date range 01/01/2023 – 31/05/2023

***   321 different consultants with 33 instances of consultants submitting joint applications

****   Based on a breakdown of number of cases that were allocated and 'still ongoing' within the date range

Evaluation summary

- The Bat EPS-MIT assessment process can have a prolonged turnaround time, depending on the number of Email signatures/FIRs.
- BER figures demonstrate an improvement in turnaround time, resulting in a significant reduction in delays to the customer.
- Earlier cases received were submitted by BER Assessors which were likely to be more complicated. With the submission of SRs from 'mainstream' ER Consultants data is more representative.

Table 5 Comparison of targets for Compliance checks for current systems versus BER

Current System			BER Targets*				BER Actual Compliance**			
Compliance Targets	Telephone %	Site %	**Compliance Targets of ER Consultants**	Desk based %	Telephone %	Site %	**Compliance Completed**	Desk based %	Telephone %	Site %
BMCL	2.5	2.5	**Accreditation Level 1**	20	0	0	**Accreditation Level 1**	15	0	0
Bat EPS-MIT Low Risk	2.5	2.5	**Accreditation Level 2**	15	0	15	**Accreditation Level 2**	17	0	1
Bat EPS-MIT High Risk	2.5	2.5	**Accreditation Level 3**	50	0	50	**Accreditation Level 3**	7	0	0

*   Based on overall numbers given in the Compliance Plan (of Site Registrations that should receive compliance checking)

**   Date range 01/01/2023 – 18/10/2023. Based on data available as of 18/10/2023, a total of 81 sites were compliance checked, 54 at AL1, 24 at AL2 and three at AL3. Planned improvements to data recording will help to ensure accuracy of compliance figures going forward.

Evaluation summary

- We have not met our targets for compliance. This likely due to:
  1. The staff originally trained on compliance would not do site visits as a normal part of their role, and compliance initially slowed as BER moved into business as usual. Additionally, there are not enough experienced staff available to complete compliance for high conservation status roosts or high-risk roost types.
  2. Newly trained staff (trained in September 2023) becoming familiar with the compliance and SR platforms. We anticipate that with more time specifically dedicated to BER the compliance figures will increase.
  3. Initially only one staff member delivering on compliance, with their time restricted by other work commitments.
- Based on compliance carried out to date, we predict that compliance checks under BER, proportionate with the level of risk, will raise and maintain professional standards in bat licensing work, leading to and improving the outcome for bats and our customers.
- We foresee that, with an improved service to customers, BER will improve the reputation of bat conservation.

Glossary

A&A	Assessment and Accreditation
AA	Accredited Agent
AL	Accreditation Level
AOSIT	Additional Online Species ID Test
Bat EPS-MIT	Individual bat mitigation licence
BCT	Bat Conservation Trust
BER	Bat Earned Recognition
BER PT	Bat Earned Recognition Project Team
Beta	Bat Earned Recognition Beta Phase
BMCL	Bat Mitigation Class Licence
CF	Competency Framework
CIEEM	Chartered Institute of Ecology and Environmental Management
CIs	Competency Indicators
COI	Conflict of Interest
Contractors	Lead Assessors/Assessors and Moderator
EQ	Evaluation Question
ER Consultant	Earned Recognition Accredited Bat Consultant
FIR	Further Information Request
FTE	Full Time Equivalent
IGN	Internal Guidance Note
MCQ	Multiple Choice Questions
Moodle	CIEEM's Moodle 'Titus Learning' System
NEWLS	Natural England Wildlife Licensing Service
OSTs	Online Scenario Tests
Principal Work Areas	Category of applicants' main area(s) of work with regard to bat mitigation activities: Agriculture/Farming/Fishing; Archaeological Investigation; Barn Conversion; Commercial (e.g. office; retail); Energy Generation/Energy Supply. Forestry; Health and Safety; Heritage/Historical (e.g. National Trust); Listed Buildings; Householder Home Improvement (e.g. loft conversion; extension; garage; conservatory; repairs); Housing (Non-Householder) (e.g. residential development; repairs/maintenance); Industrial/Manufacturing; Mineral Extraction/Quarrying; Nationally Significant Infrastructure Projects; Nature Conservation; Places of Worship; Public buildings and Land (e.g. schools; universities; hospitals; care facilities. military; prisons); Tourism/Leisure (e.g. golf courses; country parks; holiday camps); Transport/Highway; Water Management; Water Supply and Treatment/Water Environment
SDDS	Sustainable Development Digital Solutions

Shift left	For Beta, a number of CIs were taken out of the Pilot Portfolio stage, and were tested earlier in the assessment process at either MCQ or OST stage
SR	Site Registration
T&W Annex	Tree and Woodland Annex
the Pilot	Bat Earned Recognition Pilot
ToC	Theory of Change