Bat Earned Recognition Monitoring and Evaluation Report

Assessment and Accreditation and Licensing Addendum

June 2023

Natural England Research Report NERR128

NATURAL ENGLAND

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Executive summary

This addendum should be read in conjunction with the main report: [Bat Earned Recognition Monitoring and Evaluation - Assessment and Accreditation and Licensing NERR128](#)

The Bat Earned Recognition Monitoring and Evaluation Report - Assessment and Accreditation and Licensing delivered an evaluation of Phase 3 and Phase 4 of the Bat Earned Recognition Pilot ('the Pilot') up to the end of August 2022. However, to allow for a more robust report, the Pilot Site Registration period ('Phase 4'), whereby the Accredited Bat Consultant ('Consultant') submitted Site Registrations and associated documentation through the Pilot online system, was extended by 4 months from its original end date of 31 August 2022 to 31 December 2022 ('the extension period').

This addendum focusses on the monitoring and evaluation of the Phase 4 data that was collected during the extension period, and the additional data collected at the end of the Pilot stage.

Contents

1 Methodology

1.1 Site Registration questionnaire

To ensure the data was maximised, during the extension period we continued to send the Site Registration (SR) questionnaire (QL1) to Consultants who submitted a SR request for the first time. This yielded a further 13 responses, which were compared with the QL1 responses received by the data collection closing date of Phase 4[1]. The findings are summarised in Section 2.

1.2 End of Pilot questionnaire

In January 2023, after the end of Phase 4, a further 'End of Pilot' (EoP) questionnaire was circulated to all Consultants who had submitted a SR request at any time since the launch of the online SR process. Whilst the questionnaire repeated some of the questions in QL1, additional, more specific questions were asked to gather feedback on:

- The use of Accredited Agents
- Survey data used to support Site Registration request(s), and
- The importance of guidance

The results of the comparison between the responses to the same questions asked in both QL1 and in the EoP questionnaire are presented in Table 1.

A summary of the whole EoP questionnaire is provided in Section 3. Finally, the Bat Earned Recognition Project Team contacted the 14 Consultants who did not submit any SR requests under the Pilot and a summary of their feedback is also included in Section 4.

1.3 Comparison with current processes

The Bat Earned Recognition (BER) SR figures in the comparison tables in Annex 4 of the Bat Earned Recognition Monitoring and Evaluation Report - Assessment and Accreditation and Licensing were also updated to include the extension period. The detail is provided in Annex 1.

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[1] 5 September 2022

2 Summary of QL1 comparison

At the end of the extension period 29 responses had been received for QL1, representing 52% of the total number of Accredited Bat Consultants. Of those, 26 Consultants were also a Bat Mitigation Class Licence (BMCL) Registered Consultant.

The comparison between data collected during the Pilot and at the end of the extension period produced the same results across many of the questions therefore, the 'QL1 additional comments' column in Table 1 summarises only new qualitative feedback collected during the extension period.

Similarly, only new qualitative feedback gathered from the duplicate questions collected from the EoP questionnaire has been added to the 'EoP additional comments' column in Table 1.

Table 1. Comparison of QL1 responses collected during the Pilot and the extension period, and questions duplicated in the EoP questionnaire (Note: some cells have been deliberately left blank)

Question	Pilot data[2]	Extension period data[3]	QL1 additional comments	EoP duplicates response data[4]	EoP additional comments
Are you a Bat Mitigation Class Licence (BMCL) Registered Consultant?	15 Yes 1 No	11 Yes 2 No		15 Yes 16 No	
In your opinion is the BER Pilot online system more streamlined than the BMCL/EPS BAT-MIT individual licence application process?	73% Yes BMCL 100% Yes ESP-MIT	73% Yes BMCL 73% EPS-MIT	No additional comments	(BMCL ONLY) 7% Yes 33% Not sure 60% No	About the same for AL1 applications. Not easy to navigate many pages of online form; additional time required increased costs to clients; complex system more open to errors with the submission; system times out; longer to complete for all levels.
Does the process of submitting SR	33% Yes 67% No	36% Yes 64% No	No additional comments		

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[2] Date range 18/04/2022 – 05/09/2022 (Total 16 responses)

[3] Date range 06/09/22 – 31/12/2022 (Total 13 responses)

[4] Collected in January 2023 (Total 31 responses from Consultants who had submitted a SR (excludes the 14 Consultants who had not submitted a SR))

Question	Pilot data[2]	Extension period data[3]	QL1 additional comments	EoP duplicates response data[4]	EoP additional comments
documentation reduce the application time compared to BMCL?					
Does the process of submitting SR documentation reduce the time compared to EPS BAT-MIT individual licence applications (do not include the time of applying to be Accredited)?	100% Yes	100% Yes	No additional comments	100% Yes	
Is the online process of submitting SR sufficiently simple to understand?	94% Yes 6% No	85% Yes 15% No	Lack of guidance on how to complete the online form.	100% Yes	
Did an unforeseen circumstance(s) with the Licensing Process result in any unexpected delay(s) to your SR submission?	4 Instances	3 Instances	Natural England needs to make clear that the response deadline is reset when a FIR is issued.	4 Instances	Limitation of tick box options in the online form; clarity of requirements to complete the form; Technical issues.
Were you happy with the time between date of submitting the Site Registration form and the date you received a decision?	100% Yes	92% Yes 8% No	The time reset following FIR was challenging.	88% Yes 12% No	Significantly quicker than EPS BAT-MIT and decisions received within 15 working days useful for client programmes.

Question	Pilot data[2]	Extension period data[3]	QL1 additional comments	EoP duplicates response data[4]	EoP additional comments
					Severe delay due to confusion over submission of extra evidence.
In your opinion is the BER Pilot Site Registration Form a positive step forward?	94% Yes 6% No	100% Yes	Likely to reduce costs to clients.	98% Yes 2% No	
Are you optimistic about the further development, and release of BER?	88% Yes 12% Not sure	100% Yes	Benefits to being able to rely on the shorter timescales quoted.		
Did you have to change any licensable activities or works for an approved site?	1 Instance	4 Instances	No additional comments		
Compared to BMCL/EPS BAT-MIT individual licence modifications, how easy was it to request a change on a site registration?	100% Very easy	100% Very easy	No additional comments		
Did your proposals comply with 'Minimum Expectations'?	93% Yes 7% No	92% Yes 8% No			
Did you need the 'Minimum Expectations' guidance document	67% Yes 33% No	77% Yes 23% No			

Question	Pilot data[2]	Extension period data[3]	QL1 additional comments	EoP duplicates response data[4]	EoP additional comments
when creating your mitigation and compensation plans for BER Pilot site registrations?					
How helpful did you find the 'Minimum Expectations' document?	100% helpful	92% Helpful 8% Very unhelpful	BER Minimum Expectations are significantly below expectations for a standard licence.	23% Extremely reasonable 55% Somewhat reasonable 5% Neutral 5% Somewhat unreasonable	
Did you need the 'Bat ER (Pilot) Overview for ER Consultants (CL47Guidance01)' document when using the Site Registration online form for BER Pilot site registrations?	67% Yes 33% No	92% Yes 8% No	Already aware of the contents.	97% Yes 3% No	
How helpful did you find the 'Bat ER (Pilot) Overview for ER Consultants (CL47Guidance01)' document?	47% Very helpful 6% Neutral 47% Somewhat helpful	46% Very helpful 54% Somewhat helpful	No additional comments	23% Extremely useful 57% Very useful 17% Moderately useful 3% Slightly useful	

Question	Pilot data[2]	Extension period data[3]	QL1 additional comments	EoP duplicates response data[4]	EoP additional comments
To what extent do you agree that the suite of guidance documents related to the Licensing Process was sufficiently clear and fit for purpose?	100% Agree	84% Agree 8% Not sure 8% Disagree	Describe the Accreditation Levels and Annexes in a clearer way.	30% Strongly agree 58% Somewhat agree 6% Neutral 6% Somewhat disagree	
Following a site registration, have you received feedback on how to improve the way you input data on site registrations?	19% Yes 81% No	62% Yes 38% No			
How helpful did you find the feedback for your next site registration?	100% Helpful	100% Helpful	No additional comments		
Are you aware of the planned increase in compliance checks?	63% Yes 37% No	92% Yes 8% No			
In your opinion, will BER increase compliance with best practice?	44% Yes 56% No	46% Yes 54% No	No additional comments		
In your opinion, is the Licensing Process sufficiently robust to ensure that only suitably	69% Yes 31% Not sure	62% Yes 38% Not sure	No additional comments		

Question	Pilot data[2]	Extension period data[3]	QL1 additional comments	EoP duplicates response data[4]	EoP additional comments
competent ecologists are accredited?					
To what extent do you agree that the Licensing Process has the ability to maintain and/or improve outcomes for bats?	94% Agree 6% Not sure	77% Agree 23% Not sure	No additional comments		
Have you used the licence return form?	13% Yes	62% Yes			
How confident are you that the form will collect enough data to monitor the Favourable Conservation Status outcomes of registered sites?	50% Somewhat confident 50% Not sure	37% Somewhat confident 50% Not sure 13% Not confident	Time frame too short for the success of permanent replacement roosting features, FCS and success of the licence to be measured.		
To what extent do you agree that you fully understand all aspects of the Licensing Process for BER?	94% Agree 6% Disagree	100% Agree	No additional comments		

Question	Pilot data[2]	Extension period data[3]	QL1 additional comments	EoP duplicates response data[4]	EoP additional comments
Do you feel your knowledge and understanding of applying for EPS BAT-MIT individual licences has assisted you in applying for and understanding the Bat ER (Pilot) Class Licence?	100% Yes	100% Yes	No additional comments		
In your opinion, would you have found training in the Site Registration Process helpful?	25% Yes 44% Not sure 31% No	23% Yes 46% Not sure 31% No	No additional comments	49% Yes 21% Not sure 30% No	
How satisfied were you with the standard of communication with the BER Team in regard to SRs?	80% Satisfied 13% Neutral 7% Somewhat dissatisfied	85% Satisfied 15% Dissatisfied			
Do you have any suggestions/comments as to how Natural England might improve communications to enhance the ER Consultant experience?			Be clearer that SR timing is reset when a FIR is issued.		
We recognise that, as a Pilot scheme, there will			Ability to deviate from minimum		Reconsider 10% increase in bat number clause for small

Question	Pilot data[2]	Extension period data[3]	QL1 additional comments	EoP duplicates response data[4]	EoP additional comments
be improvements to be made after considering the feedback we receive. Please use the text box to provide any further details on the questions above and any suggestions you think would be helpful towards improving the scheme.			requirements where proportionate and justifiable; separate forms for moderations; upload roost information as a spreadsheet, as entering more than a few details is laborious; improved comms for adding further information, without resetting the SR.		schemes/common species; summary/FAQ document to make the guidance easier to navigate; clarity on how BER can be used to build the experience of more junior staff; ability to upload Section 11 form; better guidance on the use of NLP4 and legal mechanisms for securing mitigation for high conservation status roosts; ability to save the online licence application. (Full text in Section 4)

3 Summary of End of Pilot questionnaire

The EoP questionnaire comprised eight sections. Whilst the questionnaire repeated some of the questions asked in QL1, it invited additional feedback on more specific questions related to:

- The use of Accredited Agents
- Survey data used to support Site Registration request(s), and
- The importance of guidance

Section 1 of the questionnaire covered the Natural England Privacy Notice and did not contain any SR data.

This summary is taken from Earned Recognition (ER) Consultants' responses to the EoP questionnaire and from the 14 Consultants who did not submit any SR requests under the Pilot, although not all Consultants answered every request for explanation(s). Please note that only new qualitative feedback collected from the EoP questionnaire is included in the summary.

Section 2 Site Registrations

- The number of SRs (excluding modifications and resubmissions) Consultants submitted during 2022
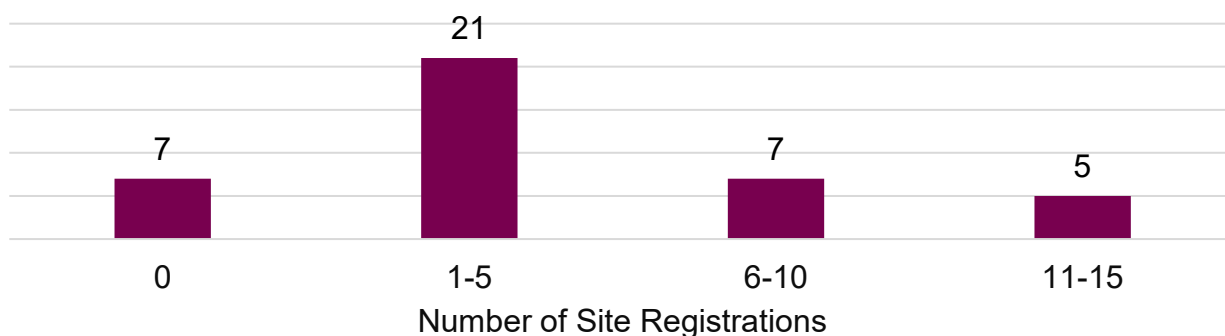
- Reasons why the Consultant did not submit more cases through the ER Pilot SR process in 2022
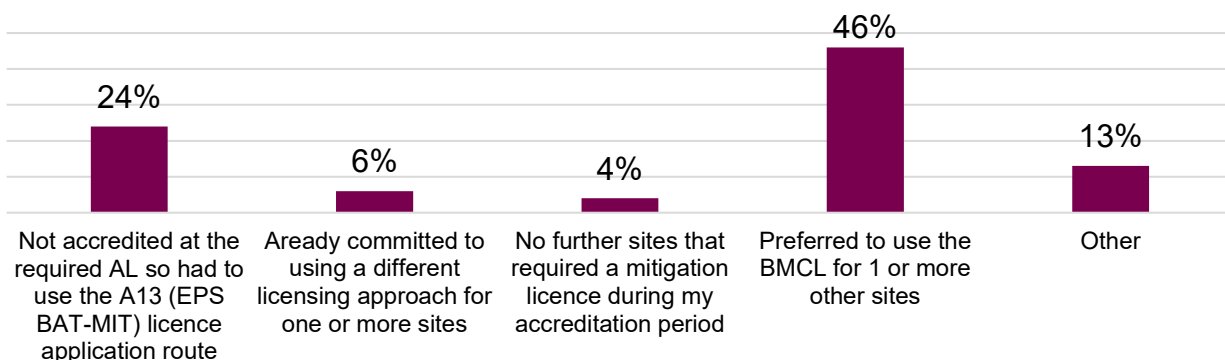
- o The 'Other' reasons were misgivings around the customer and delays due to changes in the contract.
- Of the responses to the question "Why was the BMCL preferential?" 50% said familiarity with the process, and 50% felt that less complex sites made BMCL a simpler and quicker option.
- 12% of respondents experienced unforeseen circumstance(s) with the BER licensing process which resulted in unexpected delay(s) to their SR submission.
  - o Reasons for the delays were: limitation of tick box options in the online form; clarity of requirements to complete the form; technical issues.
- 88% Consultants were happy with the time between the date of submitting the SR form and the date they received their decision, commenting that the process was significantly quicker than EPS BAT-MIT, and decisions received within 15 working days were useful for client programmes.
  - o The 12% who were not happy were disappointed with delays due to confusion over the submission of extra evidence.
- The number of Consultants required to 'Resubmit' any SR requests (using a Qualtrics link provided by Natural England) following a Further Information Request

■ Yes
■ No
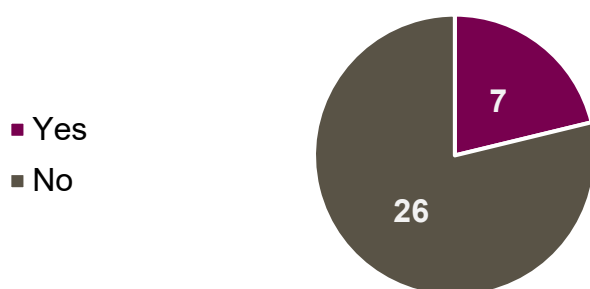
- Asked how easy it was to submit the resubmission versus BMCL/EPS BAT-MIT resubmission processes, 57% said easy, 29% were neutral and 14% found it "somewhat difficult".
- To the question 'Who did the bat surveys that supported your SR requests?' 61% answered that they were personally involved in most instances, 27% used survey data completed by different bat ecologists in most instances.
  - o The remaining 12% used a combination of the above two options.
- The explanations for why Consultants did not submit any SR requests were: no requests/suitable sites, accreditation time frame too short, and applying under other processes to build experience.

Section 3 Licence Return Form

- Number of Licence Return Forms completed and submitted for each site, in accordance with licence conditions

- **Yes** 20
- **No** 11
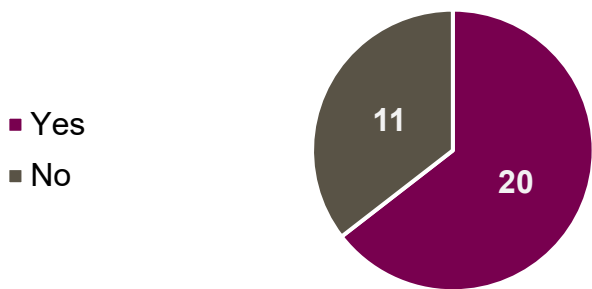
- In eight instances the Licence Return Form was not completed and submitted for each site, in accordance with licence conditions, because the Licenced activities had not started/finished. The three other reasons why not were the Consultant's misunderstanding over when the Licence Return Form was due, and that work pressures meant the deadline was missed.

- Recognising that a Monitoring Report Form must be submitted following completion of any monitoring (and therefore often over a year after initial impacts), 71% Consultants felt the Licence Return Form was an appropriate way to capture whether their compensation/mitigation has maintained or improved the FCS on site.

  - The other 29% thought not.

- There was a wide range of suggestions as to what Natural England should ask ER Consultants in order to raise standards of compensation/mitigation (were we to produce a post-development form to ask additional questions relating to the success of the compensation/mitigation features in order to meet some of the aims of BER; raising standards and maintaining or improving bat FCS). The main themes were: sharing experiences in bat work; feedback on what worked well and not so well; capture details on the efficacy of communication between Natural England/client/licensee, and where issues arose, how the issues were resolved.

Section 4 Accredited Agents

- Consultants' use of Accredited Agents (AA) to undertake licensed actions on registered sites
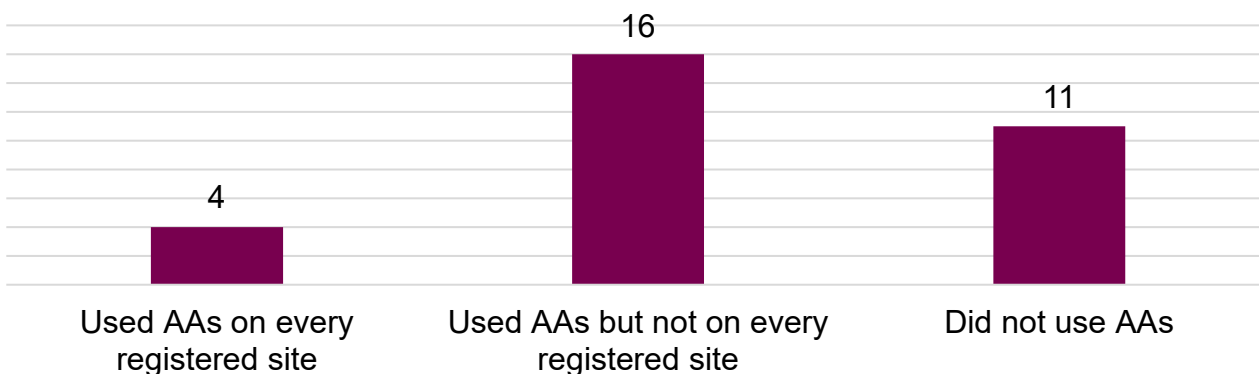
- Consultants' opinion on 'should Accredited Agents be required to demonstrate competence through a dedicated accreditation process, as opposed to the ER Consultant determining what an Accredited Agent can undertake?' showed 22% in favour, 52% against and 8% 'Not sure'.
  - Summary of comments in support: to ensure the AA is suitably trained to be competent, with suitable skills, knowledge, and experience to act in the place of the ER Consultant; to allow the AA to build experience and help them progress towards accreditation themselves; to prevent inexperienced ecologists acting as AA, thus raising/maintaining standards; may be attractive to ecologists who don't yet meet the criteria for ER.
  - Summary of comments against: It is the responsibility of the Consultant to ensure the competency and capability of the AA; Consultants are trusted to determine when to use an AA, and who to employ; a dedicated process would increase barriers and costs which would not be in the interests of bat conservation.

Section 5 Training

- The number of Consultants would have found training on the SR process helpful was 18%. 30% said 'No' and 22% were 'Not sure'.
  - Of the choices for what kind of training they would have liked 38% selected 'Online pre-recorded webinar', 25% selected 'In-person training event' and 4% chose 'More written guidance'.
  - The 33% 'Other' suggestions were: support on resubmissions, guidance specific to LP4; FAQs for each section of the process; explanation of terms/meanings.
- Explanations for why Consultants did not think it would be helpful to receive SR training were: the SR form was intuitive enough, and the guidance self-explanatory.

Section 6 Guidance

- All respondents agreed that the online process of submitting SR sufficiently simple to understand.

- Over half of the Consultants found the 'Minimum Expectations' document reasonable
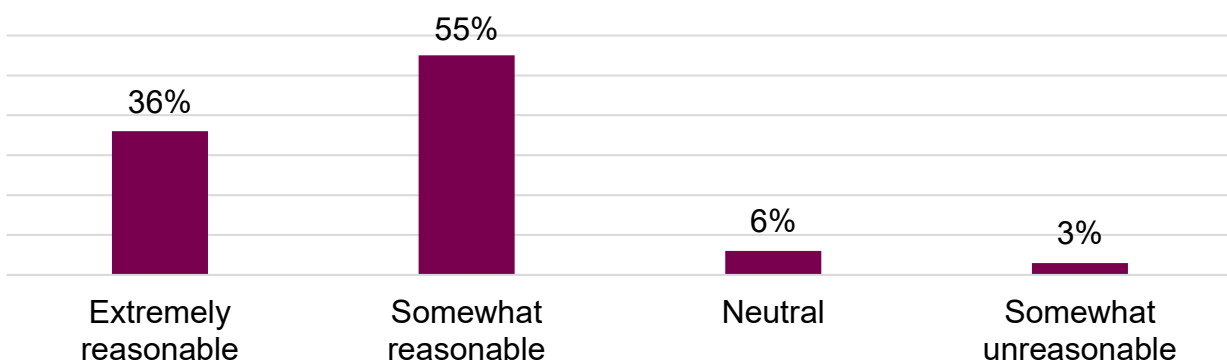

- Suggested ways to improve the 'Minimum Expectations' were to: provide information on the evidence based used; make the tables easier to follow; more information on part 4 (once

planning permission is granted); more guidance on use of the NERC Act; reinstate the guidance on trees.

- All but one Consultant said they used the 'Bat ER (Pilot) Overview for ER Consultants (CL47Guidance01)' document when using the SR online form.

- 80% of respondents found the 'Bat ER (Pilot) Overview for ER Consultants (CL47Guidance01)' document 'Extremely' or 'Very' useful. The remaining 20% found the document 'Moderately or Slightly' useful.

- 88% Consultants agreed that the suite of guidance documents related to the Licensing Process was sufficiently clear and fit for purpose.
  - 6% were neutral and 6% disagreed.

Section 7 The licensing process

- Number of Consultants who are also a BMCL Registered Consultant.
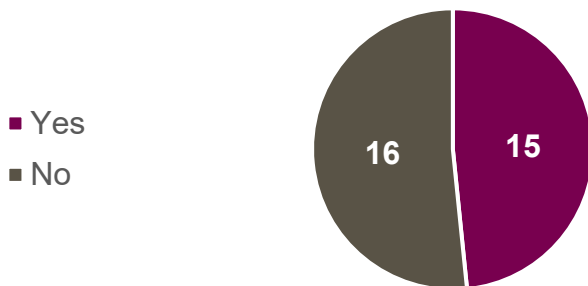
- Of the 15 BMCL Registered Consultants who commented, 7% thought that the preparation for the online Pilot SR application process was more streamlined than for the BMCL application process.
  - 60% disagreed, commenting that it was not easy to navigate the many pages of the form online; the complex system is more open to errors with the submission; system times out, and the additional time required increased costs to clients.
  - 33% were not sure but were of the opinion that the time was about the same for AL1 applications but took longer to complete for AL2 and AL3.

- 100% believed the preparation for the online Pilot application process was more streamlined than the EPS BAT-MIT individual licence application process (not including the time of applying to be accredited).

- The Consultants were 100% of the opinion that the BER Pilot Site Registration Form is a positive step forward, with one Consultant remarking that "As a system, it has impressed clients and has improved Natural England's reputation". A common point was having increased certainty for developers and the associated reduction in costs.

Section 8 General Feedback

- Suggestions on how the SR process might be improved were: reconsider the clause requiring a 10% increase in bat numbers to be reported for small schemes/common species found; a summary/FAQ document to make the guidance easier to navigate; clarity on how BER can be used to build the experience of more junior staff, and log their experience as earned; ability to upload the Section 11 form rather than having to detail roosts on the form individually; better guidance on the use of NLP4 and legal mechanisms for securing mitigation for high conservation status roosts; the ability to save the online licence application to revisit it at a later time.

4 Conclusion

Acknowledging the small number of respondents and, therefore, that the percentage differences shown may not represent a large shift in opinion, a comparison of data gathered from the extension period (QL1) and at the end of the Pilot were highly similar. The few questions that saw a downward trend can be explained by the fact that Consultants had more experience with SR by the EoP questionnaire, with more need to refer to guidance, increased chance to access guidance applicability to a range of situations, and greater opportunity to experience delays or complications.

At the start of the SR process most Consultants agreed that the BER online system was more streamlined than for BMCL. At the end of the Pilot however, over half of the Consultants found the BER process for AL1 less streamlined than for BMCL. One reason may be because by January 2023, Consultants were starting to submit more complex, but still low-risk casework, which took longer. The Consultant's views that the process of submitting SR documentation did reduce the application time when compared to EPS BAT-MIT did not change.

The results showed that the majority of Consultants remain optimistic about the further development, and release of BER and, in their opinion, the BER Pilot Site Registration Form is a positive step forward. The main reasons for this were that the speed of the service provided greater certainty for developers/clients, allowing them to programme works, and the increased scope to vary the mitigation and compensation based on the findings on-site.

In addition to the specific recommendations/comments arising from the EoP questionnaire (detailed in Table 1), the findings also highlighted other areas for future consideration:

- Better explanation of the intention of the 'Minimum Expectations' document.
- Review the Licence Return Form and data collect methods to enable longer-term, robust monitoring of the Favourable Conservation Status outcomes of registered sites.
- Explore options for the provision of training in the SR process.

In conclusion, the evaluation of information covering the efficiency of SR finds that the implementation of improvements identified during the Pilot has continued to deliver a significantly more streamlined process for both Natural England and Consultants (and their clients) and meets

the streamlining objectives of BER. It should be noted that this evaluation did not look at the other objectives of the Pilot.

As per the conclusions drawn in the Bat Earned Recognition Monitoring and Evaluation Report - Assessment and Accreditation and Licensing, 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. Additionally, whilst there was insufficient data over the timeframe of the Pilot to demonstrate improved 'PR' for bats, it can be inferred from the evaluation of the professional standards element, that BER will result in improved outcomes for bats due to higher standards of professional practice.

Annex 1 Bat Earned Recognition Pilot – Comparison with Current Processes

Table A1. Comparison of the average time taken by Natural England staff to assess and process current BMCL and EPS-MIT casework* versus BER Site Registrations**

Current system	Staff process	Average time hrs	Bat Earned Recognition	Staff process	Average time hrs
BMCL	Data processing	0.84	**Accreditation Level 1** (Limited number of Technical Assessments for this AL – most will not require assessment)	Data processing	0.25
	Technical Assessment	1.30		Technical Assessment & Checks and Decision***	0.73
	Checks and Decision	N/A			
	Average hrs total	2.14		Average hrs total	0.98
	Full Time Equivalent (FTE) (n=100)****	0.17		FTE (n=100)	0.08
EPS-MIT Low Risk*****	Data processing	1.48	**Accreditation Level 2**	Data processing	0.25
	Technical Assessment	2.86		Technical Assessment & Checks and Decision***	0.90
	Checks and Decision	0.90			
	Average hrs total	5.24		Average hrs total	1.15
	FTE (n=100)	0.41		FTE (n=100)	0.09
EPS-MIT High Risk*****	Data processing	1.48	**Accreditation Level 3**	Data processing	0.25
	Technical Assessment	4.00		Technical Assessment & Checks and Decision***	1.74
	Checks and Decision	0.90			
	Average hrs total	6.38		Average hrs total	1.99
	FTE (n=100)	0.50		FTE (n=100)	0.16

*   Based on 100 cases for each of the current processes at the times taken to process applications received 01/05/2022 – 05/09/2022

**   Based on 100 cases at the times taken to process SRs submitted 02/02/2022 – 31/12/2022

***   41% of total BER cases submitted required no assessment. 49% were targeted assessments and 10% flagged for full assessment. We are working to further reduce that number

****   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 we anticipate BER casework processing takes half of the time taken for BMCL.
- Almost five times faster for EPS-MIT Low Risk, and
- Three times faster for processing 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.
- 62% of low risk BER casework was not flagged for targeted assessment, allowing resources to focus on higher risk cases and compliance.

Table A2. Comparison of the average time taken by Consultants to prepare and submit current BMCL and EPS-MIT information against BER Accreditation Site Registrations

Current system	Consultant time	Average time hrs	Bat Earned Recognition	Accredited Bat Consultant time	Average time hrs*
BMCL**	Preparation	1.00	Accreditation Level 1*** (n=135)	Preparation	3.05
	Submission	1.00		Submission	1.56
	Average hrs total	**2.00**		Average hrs total	**4.61**
EPS-MIT Low Risk****	Preparation	9.00	Accreditation Level 2 (n=81)	Preparation	4.66
	Submission	0.25		Submission	2,51
	Average hrs total	**9.25**		Average hrs total	**7.17**
EPS-MIT High Risk****	Preparation	12.00	Accreditation Level 3 (n=33)	Preparation	4.11
	Submission	0.25		Submission	3.80
	Average hrs total	**12.25**		Average hrs total	**7.91**

*   Date range 02/02/2022 – 31/12/2022

**   From 48% Accredited Bat Consultants

***   Accreditation Levels used to enable broad comparisons

****   Times estimated based on ER Teams' previous consultancy experience

Evaluation summary

- The SR form was updated during the Pilot to capture this info and the sample size makes a full comparison difficult. However, based on current data we anticipate a promising reduction in preparation time for the Consultant (54%).
- Based on current data it is likely that it will take a consultant longer to submit a Site Registration, but it will be proportionate to the risk level. This is because EPS-MIT licence applications simply requires the prepared documents to be emailed to Natural England, whereas submission of a BER Site Registration incorporates an element of preparation.
- Overall, BER is a faster process regardless of the risk level of the site.

Table A3. 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***					Bat Earned Recognition				
SR Decision	FIR Number %	Withdrawn Number %	Email signature**** %	Average time (days) for all decisions	SR Decision	FIR Number %	Withdrawn/ Revoked Number %	Email signature %	Average time (days) for all decisions
BMCL (n-330)	3	1	4	9.8	Accreditation Level 1 (n=135)	7	4	4	9.6
EPS-MIT Low Risk (n=134)	1	20	18	46.6	Accreditation Level 2 (n=81)	9	7	9	11.6
EPS-MIT High Risk (n=203)	6	7	18	44.5	Accreditation Level 3 (n=33)	45	3	9	14.9

*   Data range 01/02/2022 – 13/04/2022

**   Date range 02/02/2022 – 31/12/2022

***   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 EPS-MIT assessment process can have a prolonged turnaround time, depending on the number of Email signatures/FIRs.
- The small sample of BER results makes a full comparison difficult but the figures already demonstrate an improvement in turnaround time and a significant reduction in delays to the customer.
- Whilst the earlier cases received were submitted by BER Assessors, which are likely to be more complicated, mainstream Consultants began submitting SRs during the extension period hence providing more representative data.

Table A4. Comparison of targets for Compliance checks for current system versus BER* At the end of the extension period, 16 compliance checks were completed: 10 at AL1, five at AL2 and one at AL3.

Current System			Bat Earned Recognition*			
Compliance Targets	Telephone %	Site %	**Compliance Targets of Accredited Bat Consultants**	Desk based %	Telephone %	Site %
BMCL	2.5	2.5	**Accreditation Level 1**	20	0	0
EPS-MIT Low Risk	2.5	2.5	**Accreditation Level 2**	15	0	15
EPS-MIT High Risk	2.5	2.5	**Accreditation Level 3**	50	0	50

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

Evaluation summary

- We have not yet been able to do the proportion of checks intended, partially due to a lag between licensing and the highest risk works that would be checked being undertaken.
- We anticipate 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.