

Bat Earned Recognition Monitoring and Evaluation Report

Assessment and Accreditation and Licensing

October 2022

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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').

Designed to test a competency-based accreditation process for bat consultants, and a new streamlined online licensing process, by which the quality of the site registration submission by the Accredited Bat Consultant is assured, the Pilot comprised five phases:

- **Phase 1:** Pre-Pilot and Stakeholder Consultation
- **Phase 2:** Materials, Policies and Processes
- **Phase 3:** Assessment and Accreditation (A&A)
- **Phase 4:** Licensing for Real
- **Phase 5:** Project Evaluation

This Bat Earned Recognition Monitoring and Evaluation Report – Assessment and Accreditation and Licensing ('the Report'), which is predominantly aimed at the Partners, Defra, the Pilot Assessors and Moderator, applicant bat consultants, Natural England licensing reform teams and the Bat Expert Panel, delivers an evaluation of Phase 3 and Phase 4 of the Pilot.

Monitoring and evaluation was carried out iteratively throughout Phases 3 and 4 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 success of the Pilot will be determined primarily by the extent to which the Pilot met its objectives. This determination has predominantly been informed by answering five Evaluation Questions (EQ), which also form the measures of success:

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

Conclusion: As a national licence, evaluation data indicated that Bat Earned Recognition (BER) is accessible to all bat consultants, at any time and, overall, it is considered a fair system.

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

Conclusion: Overall, the Pilot demonstrated considerable streamlining over current systems. Implementation of the improvements identified during the Pilot would, potentially, make the process even more efficient.

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

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 the Pilot shown potential for BER to improve outcomes for bats?

Conclusion: Insufficient data over the timeframe of the Pilot, but significant potential for improvements due to better practices as a result of raising standards, and improved 'PR' for bats.

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

Conclusion: Whilst there are risks and opportunities associated with upscaling to a national level, initial indications are that it can be a scalable and sustainable approach.

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

Based on interim evaluation, in June 2022 internal approval was given to move BER to Beta phase ('Beta'), as a step between the Pilot and potential roll-out. Furthermore, at the same time the Pilot Site Registration period was extended 4 months from its original end date of August 2022 to the end of December 2022. This was to ensure the evaluation data was maximised, allowing for a more robust report. The Pilot Site Registration process will continue to be monitored and evaluated until its scheduled closure (31 Dec 2022) and the additional data will be captured in the development of an addendum to the Report in January 2023.

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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 accreditation process for bat consultants and a new streamlined online licensing process, by which the quality of the site registration submission by the Accredited Bat Consultant is assured. Monitoring and evaluation was carried out iteratively throughout the Pilot, 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 any potential roll-out.

1.2 Scope and phasing of the Pilot

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 excluded from the Pilot.

The Pilot has been managed by a dedicated BER Project Team (BER PT), and comprised five phases:

- **Phase 1:** Pre-Pilot and Stakeholder Consultation
- **Phase 2:** Materials, Policies and Processes - implemented during the active phases 3 and 4.
- **Phase 3:** Assessment and Accreditation - four main BER Accreditation Assessment stages were undertaken of Candidates prior to their being registered under the BER Class Licence (if considered competent):

1 – Multiple Choice Questions

2 – Online Scenario Testing

3 – Portfolio of Evidence

4 – Professional Review Interview

To enable this, Phase 3 first required the recruitment, assessment, and accreditation of a sufficient number of bat consultants, recognised as highly experienced in bat survey and mitigation, who then went on to assess, and moderate in, the accreditation of Candidate BER Consultants.

- **Phase 4:** Licensing for Real - whereby ER Accredited Bat Consultants submitted site registrations and associated documentation through the Pilot online system.

- **Phase 5:** Project Evaluation – working to the high-level BER Monitoring and Evaluation Plan, covering all five Evaluation Questions, with the results delivered in one final report at the end of the Pilot period.

1.3 Objectives of the Bat Earned Recognition Pilot

The following are **objectives** that the Pilot either hoped to directly achieve or otherwise aimed to demonstrate are achievable in the event that BER is rolled out at national level:

- 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 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.
- 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 Pilot

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

The **targets** of the Pilot were:

- 1 The Pilot provided the information necessary to develop an evidence-based design of the BER approach that could be rolled out nationally, should approval be given to do so (ref [objectives 1-5](#) above).
- 2 The Pilot recruited and accredited a sufficient number of bat consultants, recognised as highly experienced in bat survey and mitigation, to become Assessors/Moderator and enable accreditation assessments of enough Candidate bat consultants to facilitate the Pilot.
- 3 The Pilot achieved BER accreditations of sufficient numbers/types of Candidate bat consultants to robustly test the accreditation process.

The Pilot determined enough streamlined licence applications to provide sufficient evidence to determine the efficacy of the BER concept and the supporting systems and processes.

1.5 Aims of the evaluation

Meeting of the targets has provided sufficient data for the evaluation to systematically assess the design, implementation and outcomes of **Phase 3 and Phase 4** of the Pilot.

The broad aims of the evaluation were 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).

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 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.

[Figure 1](#) shows the relationship flow between the evaluation targets, objectives, aims and measure of success.

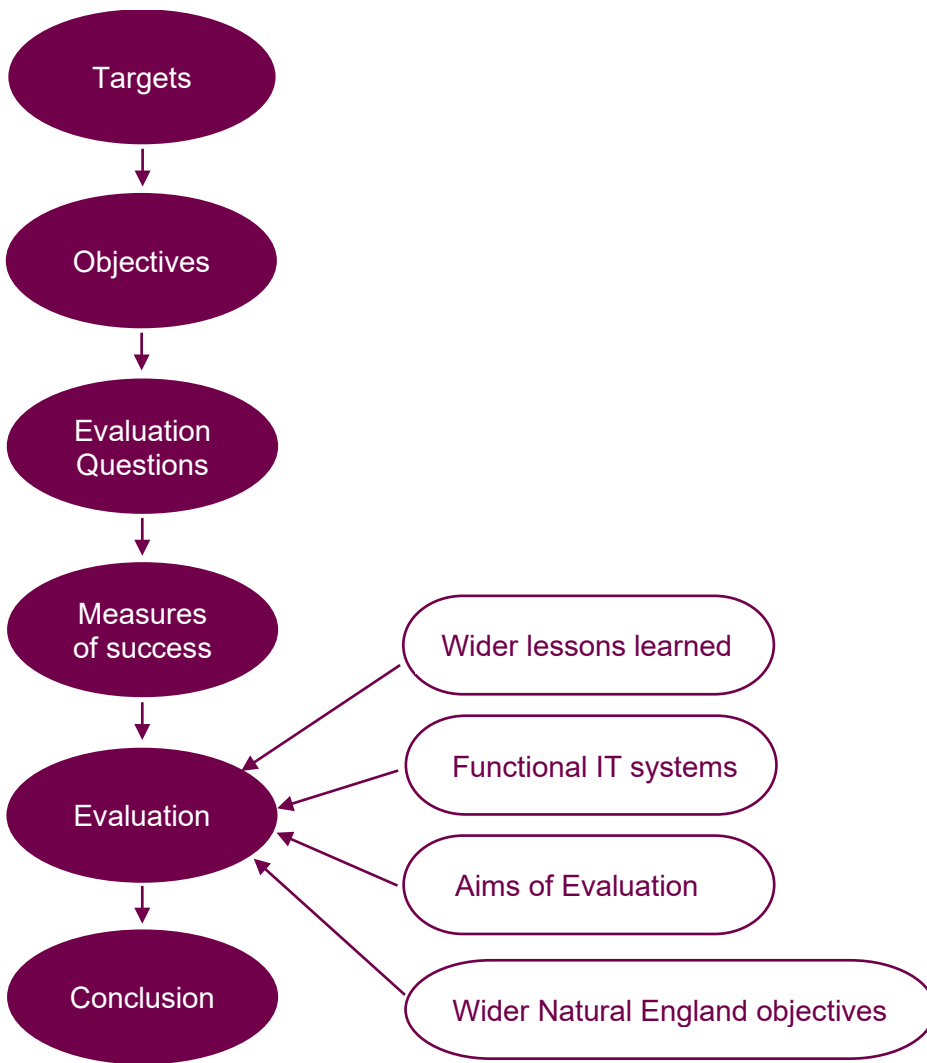


Figure 1 Relationship between Evaluation targets, objectives, aims and measure of success

A successful evaluation will determine whether BER is fit for purpose, and will feed into a recommendation on the suitability of BER to be rolled out nationally.

1.6 Managing Risk

The High-level risks detailed below were those identified in the Pilot Project Risk Register. The narrative demonstrates how each risk was managed.

Potential Limited ER Assessor Interest

- There was an early risk that the pool of individuals with the skills required to become a BER Assessor/Moderator would be limited, thereby limiting the BER Project Team’s ability to meet the timescales of the Pilot.
 - In response, a series of communications was used to engage a wide range of individuals in a timely fashion. Effective communication led to the recruitment of 15 Assessors and one Moderator, and 101 Candidate BER Consultant applications for

accreditation under the Pilot. This was in line with the agreed scale of the Pilot, and the majority of accreditation was completed within the intended timeframe.

Delays to ER Assessor Contract Completions

- There were delays to the ‘onboarding’ process for ER Assessors with regard to the agreement and issue of contracts. This largely resulted from poor communication between Assessors and the recruitment agency engaged by Natural England for the purpose. This represented a significant risk to the project in that Assessors were reluctant to engage without further clarity around payment for their work, thereby jeopardising the deliverability of the essential ER assessment stage of the Pilot. The reputational risk to both the project and Natural England as an organisation was also significant given the frustrations of the individuals involved, the delays reflecting badly on the perceived management and the potential effectiveness of the project.
 - This was managed via Natural England’s proactive management of the onboarding process, acting as mediator between the agency and Assessors to ensure any obstacles were removed. This risk was realised in part and led to some delay to the onboarding process. However, the response intervention was effective in removing all blockages to enable assessment to proceed.

Delay to Mandatory Professional Body Membership (PBM)

- BER Partners were keen to have mandatory PBM as part of BER, as a presumption of a level of competence. However, Natural England did not feel this appropriate (on the grounds of fairness, and potential limitations to the Pilot as this requirement may be an issue to some consultants) or indeed achievable for the Pilot and determined that PBM was not a requirement for the Pilot.
 - Natural England managed this risk through regular communications with Partners on this issue and an agreement that the next iteration of BER explore this further. Natural England accepts that this would further streamline the A&A process, reduce the burden on applicants, Assessors and Natural England, and reassure the Partners that bat consultants’ professional standards were being maintained.
 - Clarification on the legality of making PBM mandatory was sought from Natural England’s Legal Team, with the decision that providing Professional Body criteria is established there was no issue with PBM being mandatory for roll-out. We can confirm that mandatory PBM is currently being pursued as a central element to BER Beta.

Ambitious Timescales & Project Delays

- Recruitment delays necessitated an ambitious timescale for Pilot delivery across Phases 2, 3 and 4, requiring new BER PT induction at a critical time in the Pilot schedule; increased pressure on the BER PT due to Licensing Service Standards issues (see [Natural England Wildlife Licensing Service \(NEWLS\) Service Standards issues](#)); and potential reputational impact with Government and Partners by not delivering the project to time.
 - Workload pressures on BER PT were carefully managed through reviewing the timelines, recruitment of new Team members and Team roles being more clearly

defined. Tight scheduling and project management and prioritisation of activities on the critical path enabled the Pilot milestones to be met.

- o 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 NEWLS service standards solutions put the completion of the Pilot and/or roll-out at risk.
 - o To lessen the risk, the BER PT continued the A&A process while NEWLS transferred to a new process for current licensing systems.
 - o Additionally, during Beta the BER PT is committed to the ongoing realisation of a positive BER licensing service to demonstrate visible and effective improvements.
 - o Regular communication with NEWLS colleagues to plan resource and share news of savings achieved through BER.

Budgets

- As a Defra funded project, with a Memorandum of Agreement with Partners, and Financial Year (FY) budget, the Pilot needed careful management. Given the short timescale for the procurement and the spend, as well as reliance on the availability and capacity of external professionals ie, the Assessors, this represented a considerable challenge. Indeed, the bulk of assessments and accreditations were completed February – June 2022, therefore crossing into the new FY. For much of the year, given the Assessor capacity and resulting time delays to the Pilot, there was a serious risk of a large under spend for 2021/2022.
 - o In response, all funding pots were carefully managed by the BER Project Manager and Assessor timesheets tracked daily. The result was a very small overspend in 2021/2022 FY, and approval for a request for another small amount of funds in 2022/2023 to complete the process.
 - o In April 2022, extra money was secured for upscaling assessment materials, and funds sought for training materials/delivery. Further funds have been secured for Beta delivery.

Reputational risk to Natural England and Partners

There were three main concerns:

- 1 Perceptions from stakeholders that some consultants would be more disadvantaged than others, including those that didn't gain accreditation and/or due, for example to geographical variability in skills and access of the scheme, and accessibility of the scheme if PBM was mandatory.
 - 2 The Pilot does not bring forward benefits quickly enough or it is perceived as being unfit for purpose.
 - 3 Potential lack of roll-out to Business as Usual post Pilot.
- The risk was that unless these issues were managed appropriately, there would be sizable reputational damage to the project, the wider organisation and our Partners.

- In response, positive comms publicising BER to stakeholders, and technical consultation at beginning of Pilot ensured the project did not have unforeseen consequences for particular customer groups.
- Feedback from the evaluation will be used to make improvements to the process for Beta.
- An ongoing comms plan is in place, to keep stakeholders informed of next steps, and give early indication of more significant developments.
- A Question and Answer document is being produced for Beta.

Complex IT Systems

- The requirement for the BER PT to create a self-contained interim IT solution for the Pilot gave rise to likely additional costs and/or delays, and inherent risk that the new interim IT solutions/systems may not be effective in consideration of Business as Usual alignment.
 - Learning from previous successful interim solutions, a fix was identified that was technologically straight-forward, and which was included in staff costings. Those IT systems proved functional for the Pilot, although efficiency was reduced. IT options for Beta are being investigated, toward improving efficiency, capability and time savings longer-term.

1.7 Pilot Headline Statistics

- 12 highly experienced bat consultants recruited, trained, assessed and accredited as Accredited Assessors
- 8 instruction documents produced to facilitate the Accredited Assessor/Moderator role
- 8 documents written to guide Candidates through the Assessment and Accreditation process
- 122 bat consultants invited to take part in the Pilot
- 101 bat consultants applied for accreditation under the Pilot
- 57 bat consultants accredited
- 46% response to the Assessment and Accreditation evaluation questionnaires¹
- 1 new online system created for the submission and processing of Site Registrations
- 1 new Class Licence designed for Bat Earned Recognition
- additional licensing documents produced to assist the Site Registration (Licensing) process
- 150 Site Registrations submitted¹
- 57% response to the Site Registration evaluation questionnaire¹
- 30 (23%) Compliance checks completed so far²

2 Methodology

2.1 Theory of Change

A comprehensive Theory of Change (ToC), or Logic Model ([Annex 1](#)), was formulated by the Partners to map out how the activities and inputs of the Pilot, via the tangible outputs of the activities, might lead to the desired goals or objectives being achieved.

2.2 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.

The Evaluation Questions set out below were identified to reflect the BER Logic Model

- 1 **EQ1:** Is the process of becoming an ER Accredited Bat Consultant accessible, fair and consistent?
- 2 **EQ2:** To what extent has the Pilot shown potential for BER to streamline the bat mitigation licensing process?
- 3 **EQ3:** To what extent has the Pilot shown potential for BER to raise and maintain professional standards?
- 4 **EQ4:** To what extent has the Pilot 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?

Underpinned by the identified [Assumptions and Enablers](#), listed in Annex 1, each EQ was further broken down into sub-questions, with judgement criteria that set out how an EQ would be answered, what data would be collected, and the approach to analysing the data. The five Evaluation Questions represent the Pilot's measures of success.

2.3 Evaluation Questionnaires

Assessment and Accreditation Questionnaires

Questionnaires were created to gather feedback from discrete groups of participants on the A&A process (all questions and raw data responses are available in [Appendix1](#)).

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

- Successful Accredited Bat Consultants
- Candidates that were unsuccessful at any stage in the process
- Candidates that withdrew from the Pilot at any stage in the process

- Interested parties who did not engage in the Pilot following an invitation to take part
- Accredited BER Assessors
- Internal Project Team and Technical Group colleagues
- Partners (CIEEM and BCT)

A total of 149 A&A process questionnaires were sent (across all groups) and 46 percent response received.

In addition, a total of 18 questionnaires on the roles of Moderator and Assessor went to:

- BER Project Team
- Moderator
- Accredited Bat Consultants, to which 78 percent responded.

A summary of A&A responses is provided in [Annex 2](#).

Site Registration Questionnaire

The Licensing for Real stage (Phase 4) commenced in January 2022. Whilst a large majority of the data requirements were inherently fulfilled by the online Site Registration (SR) and Licensing data collection process, a questionnaire for Licensing was designed and sent to the Accredited Bat Consultants, to get feedback on their experience of using the Pilot online system.

To further facilitate evaluation, the Licensing questionnaire specifically sought feedback on whether Accredited Bat Consultants thought that the process of submitting SR documentation via the Pilot online system reduced the application time compared to the Bat Mitigation Class Licence (BMCL). Feedback was also invited on whether Accredited Bat Consultants thought that the process of submitting SR documentation through the Pilot online system reduced the application time compared to individual Bat Mitigation (EPS-MIT) applications.

A summary of SR responses is provided in [Annex 3](#).

2.4 Parallel testing

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

Assessment and Accreditation

Parallel testing of Phase 3 examined the rate of differences across each stage of the process with two BER Assessors independently, but in parallel, scoring a Candidate's accreditation (dual assessment). 45 percent Candidates were dual assessed.

Cross checks of the dual assessments, carried out by the BER PT, showed that the Assessors agreed on the overall Candidate scores and Accreditation Level, including

following Moderator intervention, where that was necessary. However, due to delays in the A&A process it was not possible to thoroughly cross check the dual Assessors' decision for each Competency Indicator, for every Candidate. It is recommended that this is explored for Beta, to confirm that BER is a fair and consistent approach.

Site Registration

Originally, it was envisaged that BER data would be put through the BMCL process beside BER. However, due to the significant differences between the schemes, the data was incompatible and inappropriate to compare. Therefore, an alternative approach was adopted.

For Phase 4, a simplistic comparison of assessment processing time of BMCL, and individual EPS-MIT casework, versus BER Site Registrations was carried out. Full details are provided in [Annex 4 \(Table 1\)](#).

3 Answering the five 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 Accredited Bat Consultant accessible, fair and consistent?

- All Natural England staff, sub-contractors eg, 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. Four participants requested and were accommodated reasonable adjustments.
- We compared the accessibility of BER with BMCL, which also uses species annexes, 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 which BER does not
 - BMCL required an additional compulsory attendance at a two-day training course, which was not the case with the BER Pilot
 - The BER Pilot did not require Professional Body Membership, whereas BMCL does. However, this requirement will be brought in for BER during Beta.
- As a small number of applicants felt that BER was not appropriate for 'northern' bats we looked at geographic coverage. Accreditation application statistics showed representation in each region¹, for each Accreditation Level (AL), and across a range of company sizes². The chart at [Figure 2](#) shows the geographic spread of Accreditation applications, by company size, for each AL.

¹ E Midlands, E of England, Greater London & London Boroughs, N East, N West, S East, S West, W Midlands and Yorkshire & Humber

² Company size (number of employees): Sole, Micro (1-10), Small (11-49), Medium (50-249) and Large (250+)

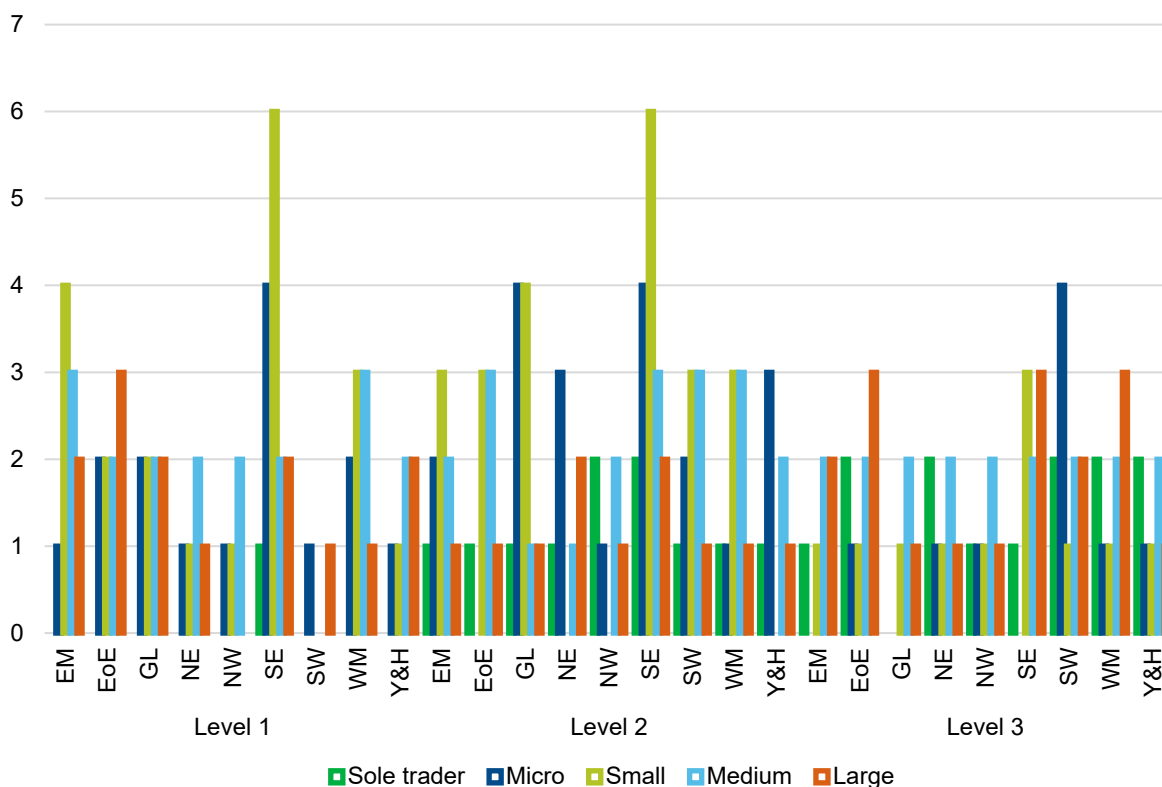


Figure 2 Geographic spread of Accreditation applications, by company size, for each Accreditation Level (AL)

- There was a balance in the number of applications for each AL³, and application data demonstrated that all 20 Principal Work Areas across each AL were represented, except for Archaeological Investigation or Places of Worship for AL1. Flood and Coastal Defence was not covered under AL2, and Communications was not covered under AL3.
- The system has been specifically designed to ensure that anyone with evidence of sufficient competence (from any source) can achieve Accreditation. However, due to delays in the A&A process, there was no time to appraise Assessors' decisions to confirm, or otherwise, that bat consultants starting off in the industry, with sufficient competence, but minimal evidence of that competence, were not being excluded from becoming accredited. This will continue to be monitored during Beta.
- There was some feedback suggesting that some individuals were unable to achieve their desired level of Accreditation due to lower competence on a very specific area, eg tree roosts. We are planning to address this in Beta by the addition of more Annexes, which will allow increased specificity in the work candidates may be accredited to undertake.

³ AL1 = 28, AL2 = 32 and AL3 = 25

- Where EQ1 questions were specifically asked⁴, 64 percent of respondents felt that their Assessor/Assessors were fair, and 69 percent agreed that the outcome of their assessment was a fair and robust assessment of their competence⁵. This provided a good indication that the assessments were, largely, considered to be a fair process; even where there were perceived constraints in the Candidate BER Consultant being accredited to the level they felt they were competent to. This latter point must be caveated by feedback from the Assessor Team that many Candidates applied for Accreditation Levels and/or Species Annexes that they could not evidence as being competent to hold.
- For the Pilot, all Candidate BER Consultant assessment decisions were independently checked by BER PT members to test the consistency of Assessors' 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, only one 'fail' decision was contrary to the result of the BER PT members. Clearer guidance for Assessors is an improvement identified for Beta.
- The BER Moderator was also active throughout the A&A stage to aid consistent decision making, including moderating cases where there were differing conclusions at dual assessment and borderline cases.
- At the start of the Portfolio stage there was no limit to the number of Further Information Requests (FIRs) a Candidate might receive. However, the volume of FIRs issued by the Assessors and Moderator was unexpected and the resultant delays soon led to the introduction of a cap on the number of FIRs per Candidate. Due to the high Candidate 'drop out' rate at the Portfolio stage, the limit was subsequently raised to facilitate the completion of sufficient assessments. Whilst this could be considered unfair, the action was taken in response to previously unknown consequences, and ensured enough Candidates were retained to keep the Pilot viable. Learning from this experience will be used in Beta to set an appropriate FIR cap.

In conclusion - while a number of improvements have been identified to be implemented in Beta - as a national licence, evaluation data indicated that BER is accessible to all bat consultants, at any time and, overall, it is considered a fair system.

⁴ Questionnaire A1, A3 & A5

⁵ Questionnaire A1, A2 & A5

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

Accreditation

- The applicant's time commitment for Pilot BER Accreditation is double that for BMCL applicants (see [Annex 4, Table 3](#)). However, up-front time dedicated to BER should be seen in the context of being able to receive rapid turnaround on much higher risk casework than BMCL allows. Proposals are in place to ensure the BER Accreditation is further streamlined during Beta.
- Staff Full Time Equivalent (FTE) for assessing a BER Candidate is almost the same as for a BMCL Candidate ([Annex 4, Table 3](#)). It would, therefore, be more sensible to invest in the BER process than continuing with processing BMCL applications, given the wider remit and reduction in costs and delays to the customer, developers, and Natural England that BER would deliver (see '[Site Registration](#)').
- The majority response received to questions regarding the suite of Assessor and Candidate A&A guidance documentation indicated to us that a number of improvements needed to be made. In acknowledgement, the qualitative data will be used to help towards improving the guidance accordingly.
- Undoubtedly the A&A process was more onerous for all parties than anticipated at the outset of the Pilot. This was in part due to processes evolving, and external Assessors wanting to ensure the robustness of assessments, over and above the process outlined in the guidance. The principal issue identified centred around the length of time required to assess Candidate Portfolios and the number of FIRs. Moving to Beta, all the 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 to set an appropriate cap on the number of FIRs. Long-term this will save costs for Natural England and should make BER more attractive to consultants ie, ensuring faster payback on time investment.

Site Registration

- The BER Site Registration (SR) form captured the time a consultant takes to complete each submission. The sample size available during the Pilot 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 two thirds of the time taken for BMCL, is three times faster than for EPS-MIT Low Risk, and two times faster for processing EPS-MIT High Risk casework (each licensing route was compared to the BER AL equivalent in risk level ([Annex 4, Table 1](#))).
- The more streamlined approach will enable an Accredited Bat Consultant to prepare 2 to 3 BER Site Registrations for every EPS-MIT application they prepare. This will, potentially, reduce a backlog of development and/or other works requiring a licence due to the time required to prepare an application ready for submission under current licensing systems ([Annex 4, Table 2](#)).

- On average, an Accredited Bat Consultant needs 2 hours to complete the **online submission** of a Site Registration, compared to 0.25 hours to submit an EPS-MIT. However, the reduced preparation time offsets the extra time required to submit the BER SR ([Annex 4, Table 2](#)).
- Proportionate to the risk level, many cases will go through without the need for targeted assessment, particularly AL1 casework, ensuring internal resources are able to focus on higher risk cases, and free up-front time for compliance checking.
- The proportion of AL1 cases not requiring manual assessment was lower than expected for the Pilot. Anecdotally this appeared to be more to do with Accredited Bat Consultants continuing to register low-risk casework through either BMCL or applying for an individual licence and submitting site registrations for a higher AL, to 'test the system'. As the scheme is expanded through Beta, we anticipate that more AL1 cases will be submitted as routine, and will encourage Accredited Bat Consultants to do so.
- Overall – across the three risk levels – the time saving is in excess of 50 percent. The Natural England Business Case predicted that full roll out of BER would result in 90 percent of applications going through this route, and that this would deliver a 74 percent reduction in workload. Given that the Pilot has been our first test of this new approach, with a much smaller sample size, a 50 percent time saving represents good progress towards our target.
- Whilst the savings BER achieved were less in relation to the new standard licence process than those calculated from the previous process, BER still resulted in a significant overall saving. Given that this comparative reduction is a result of raising of the baseline, it was seen as a positive overall improvement in licensing service standards, rather than detracting from BER.

Conclusion:

- With the necessary and appropriate adjustments to the Assessment and Accreditation process eg, adjustments to the guidance documentation, it is conceivable that the BER A&A process would be sufficiently streamlined as to reduce costs for Natural England and its customers.
- The BER Site Registration process would deliver a significantly more streamlined process for both Natural England and Accredited Bat Consultants (and their clients/developers).
- Overall, the Pilot demonstrated considerable streamlining over current systems. Implementation of the improvements identified during the Pilot would, potentially, make the process even more efficient.

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

- Our Assessor Team indicated that Candidates frequently 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 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 (and potentially illegal) 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 or illegal practices. This indicated that BER can help to identify poor professional practice (and prevent persons doing the work and/or 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 the Pilot. Key to this, and a crucial element of the BER approach, was compliance checking licenced work. Compliance checking, to help inform/ensure compliance with good practice, was delayed for several reasons and no site visits have so far been done during the Pilot. This is partly because no visits can be made to sites with the highest-impact work (AL3) at maternity sites, until October, and three site visits are scheduled for the autumn months and more due to be scheduled. However, BER PT had started compliance checks on recently received licence return forms. Notably, the information provided in the forms was detailed enough so that follow-up phone calls have not so far been required. Compliance checking will continue to be priority for Beta.
- Another safeguard of the BER approach centres on time-limited Accredited Bat Consultant Accreditation. For the purposes of the Pilot, this was limited to the end of December 2022, and will be continued into Beta. However, proposals for Beta are the requirement for Accredited Bat Consultants to complete regular, eg 3-5 year Accreditation re-testing, either wholly or partially, against the Competency Framework. Those initially accredited during the Pilot will be re-tested sooner.
- The Site Registration questionnaire⁶ sought the Accredited Bat Consultants' opinion on whether BER was a means of maintaining and raising professional standards. The majority of responses were positive.

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. In addition, should BER be rolled out, making Professional Body Membership mandatory would offer added reassurance to the Partners that Bat Consultants' professional standards were being maintained.

⁶ QL1

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

- The potential to improve outcomes for bats was difficult to evaluate within the lifetime of the Pilot, as monitoring data of licenced activities was sparse. More information will become available during Beta and over the next few years as monitoring work increases. The required reports of action taken under this licence are designed to collect the information required to allow robust determination of the outcomes for bats over the longer term.
- Improving outcomes for bats is, however, closely linked with EQ3 (professional standards) and it can be inferred from the evaluation of this element, that BER will result in improved outcomes for bats due to 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.

Conclusion: Insufficient data over the timeframe of the Pilot, but significant potential for improvements due to better practices and improved 'PR' for bats.

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

Accreditation Materials and Assessment

- All Accreditation materials, for every stage, appear up-scalable from those developed during the Pilot; with time (staff/contractor resource) and development of a new IT system being the main constraints. A suite of 'upscaled' materials would need to be developed to ensure a diverse set of 'unique' questions for Candidates. Also, Accreditation materials would need to be regularly updated, eg every ~5 years so that they remain 'novel' tests and up-to-date. The cost of this would need 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, ie winter. Proposals for Beta are to recruit more Assessors (12 for the Pilot). Natural England is considering the potential for suitably qualified internal staff to undertake/assist in Accreditation assessments.
- Feedback suggested that there are likely to be long-term advantages in having a cohort of suitably qualified internal Assessors and/or Moderator(s), to work alongside external contractors. Such advantages are:
 - Year-round availability and capacity to carry out assessments, and continuity with the established principles of BER

- A standardised and controlled approach to moderation, ensuring an enduring fair and consistent approach to BER
- Enhanced discipline around the use of personal data and IT systems, consistent with Natural England ways of working
- Straightforward budgeting for staff and other resource requirements. Enlarging the Assessor/Moderator 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.

Site Registrations (Licensing)

- A scalable Site Registration process is dependent on sufficient resource and a fully functional IT system.
- The Pilot has not charged for Site Registrations. However, there is an expectation that Natural England will recover costs for licensing (other than for those situations that are exempt). We anticipate charging for any future Site Registrations and discussions are underway to enable charging under the current Statutory Instrument (SI) permitting charging for licences; alongside feeding into proposed changes to the SI. Recovering costs for Site Registrations and Accreditation assessments will result in sustainability of the system at a national level in perpetuity.

IT Systems

- It is important to note that the online testing platform for the Assessment and Accreditation element of the Pilot relied on the use of CIEEM's Learning Management System (LMS) and subsequent data extraction to Natural England systems. The use of multiple systems was not the most efficient practice, and neither is it sustainable long-term. The BER PT is investigating a Natural England owned IT system as an effective, efficient long-term solution. However, lead-in time is such that this is highly unlikely to be available for Beta, and continued use of CIEEM's LMS has been secured for Beta. Should BER be rolled out, a dedicated platform would need to be developed for Natural England as a long-term solution.
- Further, a digital online system for licence implementation/site registration and licence return processing was created for the Pilot. This was a complex procedure involving the use of Qualtrics, Excel (for data extraction) and SharePoint Online, which needed adjustments throughout the Pilot. The development of a bespoke site registration platform that can be tested during Beta is doubtful, therefore, improvements and updates to the existing system need to be made. For potential roll-out, any new site registration system must also allow for charging and be compatible with the A&A system.

Conclusion: Whilst there are risks and opportunities (to bring more functions in-house) associated with upscaling to a national level, initial indications are that it can be a scalable and sustainable approach. Bespoke, Natural England owned IT systems are a key factor in achieving long-term sustainability.

4 How the Pilot 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 the Pilot successfully meets its listed objectives ([section 1.3](#)), it will also meet the wider vision, mission and goals of Natural England.

5 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 EQ, which make up the measures of success. This has allowed a conclusion on each EQ. A number of areas have been identified for improvement, and these are informing our preparation for Beta. 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 the Pilot'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 Report will be shared with licensing reform teams in Natural England. Early conversations have begun 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.

The Pilot has Assessed and Accredited 57 Bat Consultants, and determined in excess of 100 site registrations. Evaluation has found that these processes were sufficiently robust, with positive feedback from Candidate/Accredited Bat Consultants.

- 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 IT systems used for the Pilot have enabled the process to operate, but not in the most efficient way. The process has demonstrated significant streamlining, but maximum savings will only be realised with bespoke IT systems. It is recognised that Natural England owned, bespoke systems are required for sustainable, long-term use.

Having met these aims and requirements, we consider the evaluation to be sufficiently robust to determine whether the Pilot’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 Pilot Targets

Pilot Target	Evaluation
Provide the information necessary to develop an evidence-based design of the BER approach that could be rolled out nationally, should approval be given to do so.	Information from the Pilot is allowing us to develop the BER approaches and materials for Beta phase, which is intended to move to roll out upon approval.
Recruit a sufficient number of consultants, recognised as highly experienced in bat survey and mitigation, to enable accreditation assessments of enough bat Consultants to facilitate the Pilot.	The target to recruit a minimum 10 bat Consultants was met. 12 consultants were accredited to become BER Assessors. The intention to have Candidate assessments carried out by an Assessor with a higher Accreditation Level was assured, in that all (Pilot) Assessors attained Accreditation Level 3. One Moderator was also accredited.
Achieve BER accreditations of sufficient numbers/types of Bat Consultants to robustly test the accreditation process.	The target of accrediting a minimum 75 Bat Consultants was not met. However, the total of 57, including Assessors and Moderator, was enough to test the process and highlight areas for improvement.

Pilot 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 100 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.

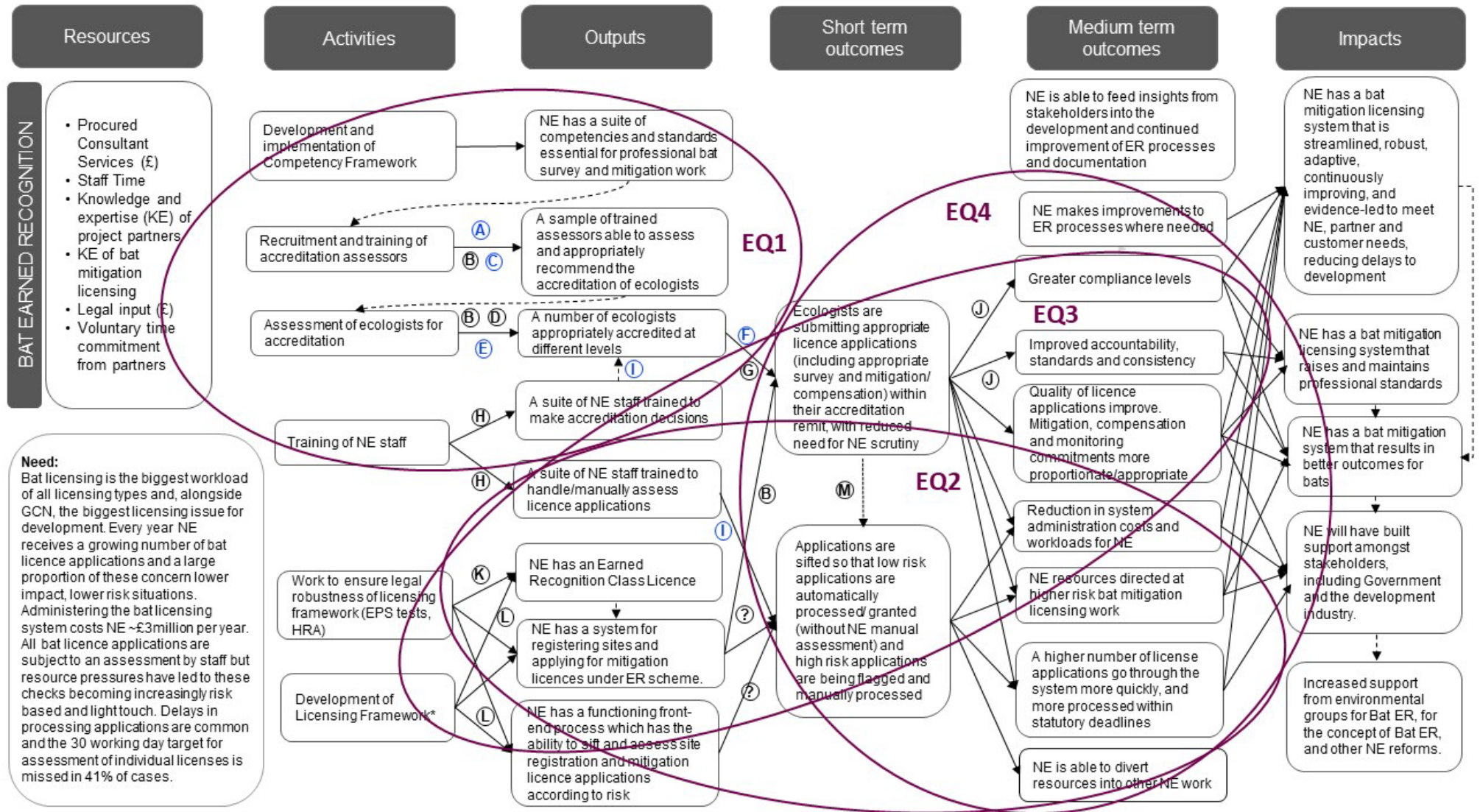
Table B Summary of the evaluation of the BER Pilot Objectives

Pilot 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.
Raise and maintain clear 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.	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 the Pilot. However, the likely better standards of practice would heavily infer that improved outcomes for bats will result.
Identify the necessary framework and mechanisms required for national roll-out.	Whilst there are risks and opportunities associated with upscaling to a national level, initial indications are that it can be a scalable and sustainable approach.
Reduce the cost of administering the system.	Streamlining savings are expected to increase based on Pilot learning and planned refinements over the latter half of 2022 in preparation for Beta.

Pilot Objective	Evaluation
Free up resource availability for other organisational priorities, such as compliance monitoring.	The Pilot has demonstrated considerable streamlining over current systems; 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 Bat Earned Recognition Logic Model showing alignment with BER Evaluation Questions 1 - 4



Activities - Enablers (blue circles) and Assumptions (grey circles)

- A. Training and induction of Assessors is thorough and consistent, and training materials are fit for purpose
- B. Clear policies and guidance are provided, and made available from the outset
- C. A sufficient number of candidates with the required competence and experience apply to be an Assessor, and a sufficient number of Candidate Assessors gain accreditation. Applicants understand and apply for appropriate Accreditation Level
- D. Assessment uses a clear and appropriate Competency Framework with standards and competencies fit for purpose; assessment of Candidates is consistent and fair; assessment is underpinned by a robust assessment strategy including a Quality Assurance process for assuring the work of the Assessors
- E. Natural England accredits consultants on recommendation of Assessor
- F. Information provided by consultants is accurate and consistent
- G. Training of Natural England staff is thorough and consistent, and training materials are fit for purpose
- H. Trained Natural England staff are available for relevant activities
- I. Accredited Consultants will be operating at higher levels of competency therefore standards and consistency will increase and the disciplinary process is effective at ensuring that BER Bat Consultants are fully accountable for their professional work
- J. Class licence is legally fit for purpose
- K. Appropriate IT and charging systems in place and fit for purpose
- L. Automatic sifting process is robust, and high-risk applications are flagged for manual assessment
- M. Consultants have sufficient information/training to use the licence application process as intended

*Including drafting of:

Accreditation Levels

Species Annexes

Class Licence

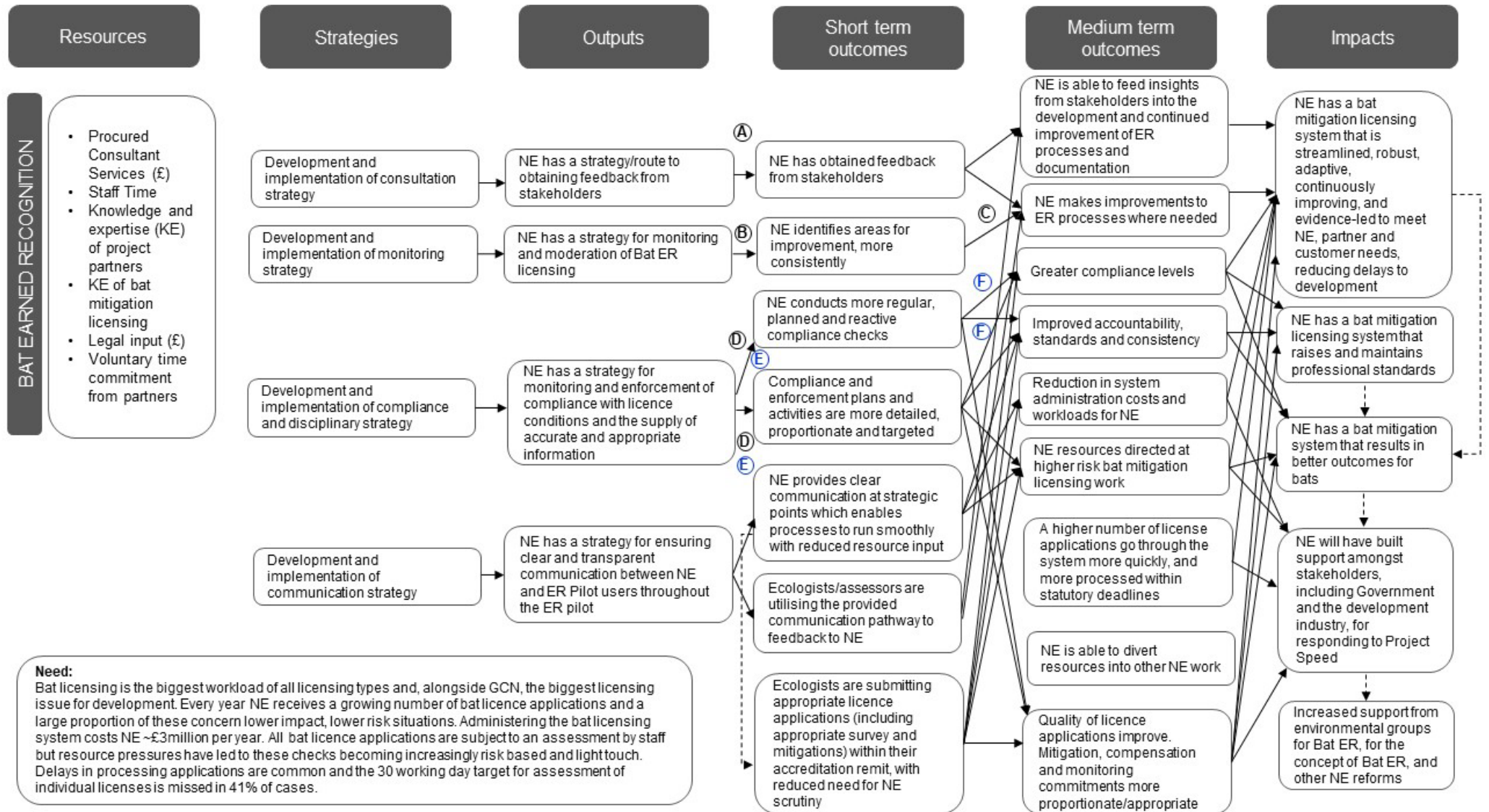
Site Registration Forms

Return and Monitoring Forms

Developing Strategic Licensing Approaches (3 tests)

Front-end process (interim and longer term)

Charging strategy



Strategies - Enablers (blue circles) and Assumptions (grey circles)

- A. Sufficient and clear information is provided to allow stakeholders to provide meaningful feedback
- B. The monitoring strategy enables the successful monitoring and collation of data of each stage of the BER Pilot - consultation, recruitment of Assessors and Candidate BER Consultants; training and induction of Assessors; assessment and accreditation of Candidates; development of licensing framework; and licensing for real.
- C. The monitoring strategy enables the continued monitoring and data collection of BER processes in Business as Usual - training and induction of Assessors; assessment and accreditation of bat consultants; site registration and licence applications
- D. Legal barriers to conducting compliance checks are met
- E. Compliance activities are agreed under a wider compliance strategy
- F. Natural England has a system for sanctioning/enforcement

Annex 2 Summary of responses to Assessment and Accreditation Questionnaires (A1 – A10)

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

- Successful Accredited Bat Consultants (A1)
- Candidates that were unsuccessful at any stage in the process (A2)
- Candidates that withdrew from the Pilot at any stage in the process (A3)
- Interested parties who did not engage in the Pilot following an invitation to take part (A4)
- Accredited BER Assessors (A5)
- Internal Project Team and Technical Group colleagues (A6)
- Partners (CIEEM and BCT) (A7)

A total of 149 A&A process questionnaires were sent (across all groups) and 46 percent response received⁷.

In addition, questionnaires were created to gather feedback specifically on the roles of Moderator and Assessor. Those questionnaires were sent to:

- BER Project Team (A8)
- Moderator (A9)
- Accredited Bat Consultants (A10)

A total of 18 role questionnaires were sent, to which 78 percent responded¹.

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. Also, qualitative data has been drawn from both the questionnaire free text boxes and feedback captured in the BER mailbox.

Questionnaires A1 – A7

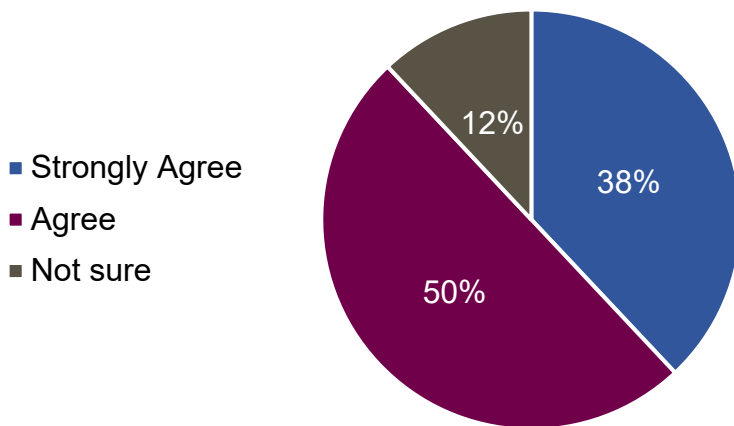
General A&A process questions

- The decisions prospective candidates gave for not proceeding with the accreditation assessment, following an invitation to apply⁸, were:
 - The application process (71%), which was considered too time consuming and a lot to fit in around work and other commitments.
 - Personal circumstances (29%)

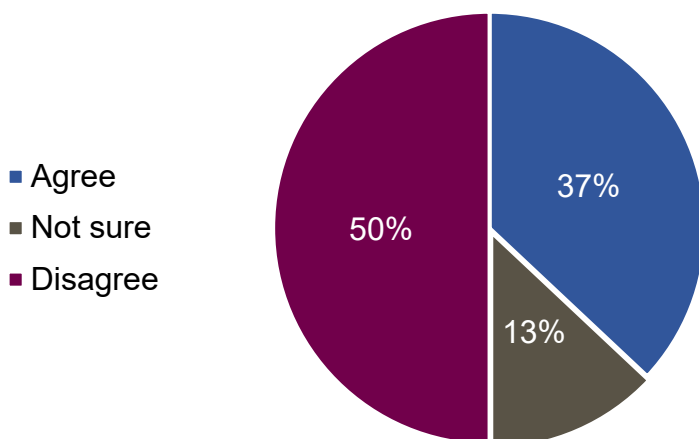
⁷ Cut off date 5 September 2022

⁸ A4 only

- On training to become an Assessor, the extent to which Assessors agreed they fully understood all aspects of the BER A&A process is

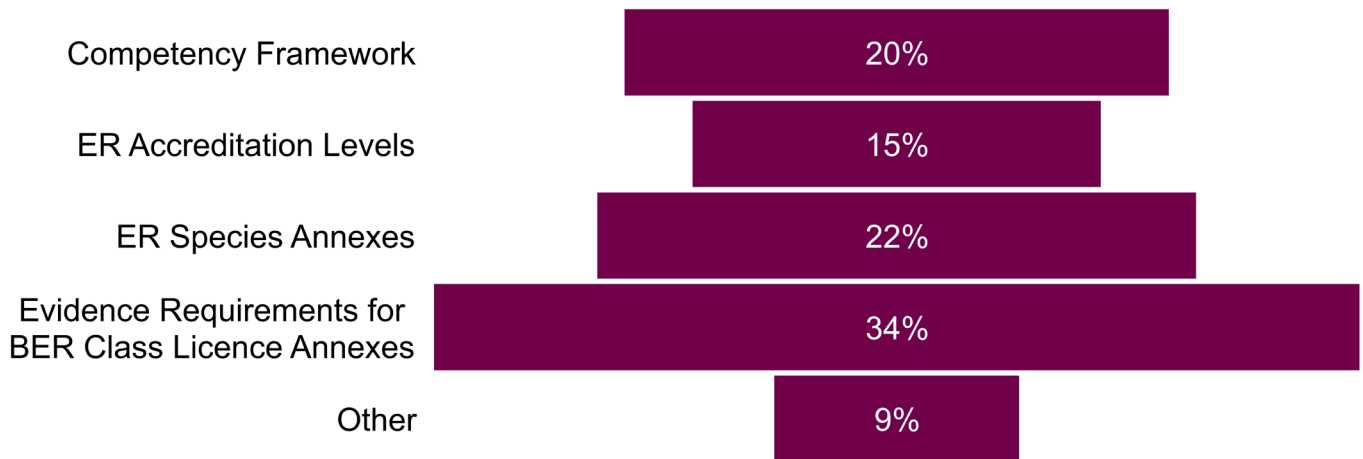


- 71% Colleagues and Partners agreed they fully understood all aspects of the BER A&A process.
- 100% Assessors thought that the Assessor training sessions were fit for purpose.
- 100% Assessors agreed that each of the four stages of assessment tested the relevant aspects of the Competency Framework (CF) for each Accreditation Level (AL).
- 75% Assessors judged the risk associated with each AL to be appropriate. The remainder were 'Not sure'.
- Where comment was made, Partners thought the MCQ, OST and Portfolio guidance for Assessors, and the MCQ, OST and Portfolio guidance for Candidates were clear and fit for purpose.
- The split of Assessors' opinion, that the Candidates they assessed applied for the correct AL, which the Candidate felt aligned with their level of competence

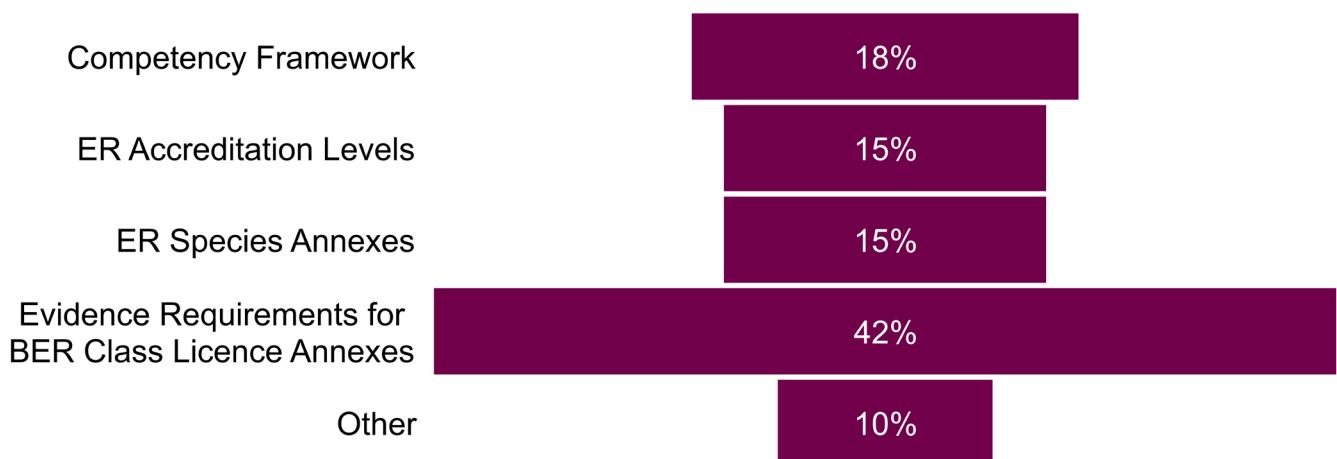


- The Assessors who disagreed were generally of the opinion that their Candidate(s) were low on evidence, thus 'over-reaching' in the hope of attaining a higher AL.

- Half the Assessors agreed that the concept of a Candidate’s progression from one AL to another, in line with the relevant increase in competency is appropriate. The other 50% were ‘Not sure’.
- 62% of all who applied under the Pilot agreed that they were able to apply for an AL that they thought aligned with their professional bat mitigation competence.
 - The aspects that prevented the other 38% from applying for an AL which they felt matched their competence were listed as



- ‘Other’ aspects specified concerned Myotis genus being grouped in with high-risk roosts, and smaller consultancies not always covering higher risk or complex situations.
- 62% said they were able to apply for the Species Annexes that they thought aligned with their competence.
 - The aspects that prevented the other 38% from applying for a Species Annex which they felt matched their competence were listed as



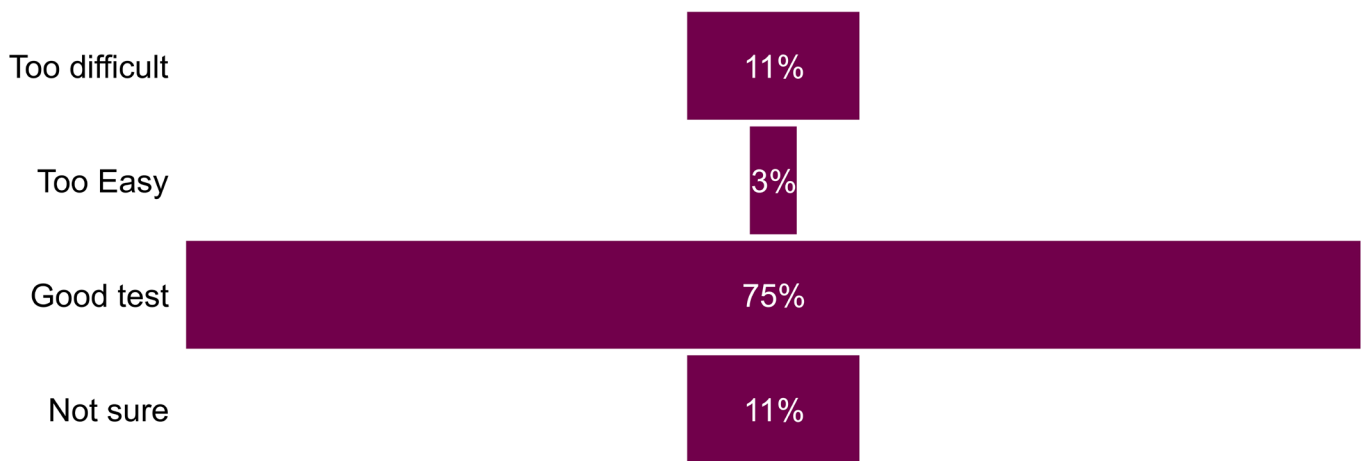
- ‘Other’ aspects specified concerned Candidates changing jobs so unable to access all the evidence, authorship of evidence, and not able to select the relevant roost types.
- Candidates who commented specifically on issues with the AL/Annex matrix and/or the CF said they were not able to meet some of the competencies due to the size of the company they worked for and, as a consequence, the type of works they had access to and could evidence.

Also, the setup of the CF also made it difficult for some Candidates, who had a lot of experience, to provide up to date evidence of their competence.

- 61% either strongly agreed or agreed that the guidance and communication within the Accreditation documentation was clear and fit for purpose.
- More than half of those questioned agreed that the CF was sufficiently clear to allow them to apply for the appropriate AL.
 - 31% disagreed and 15% were 'Not sure'.
- 40% considered the standard of the availability of, and communication with Natural England to be poor. 39% thought the standard was good and the remaining 21% made no comment.

Multiple Choice Questions

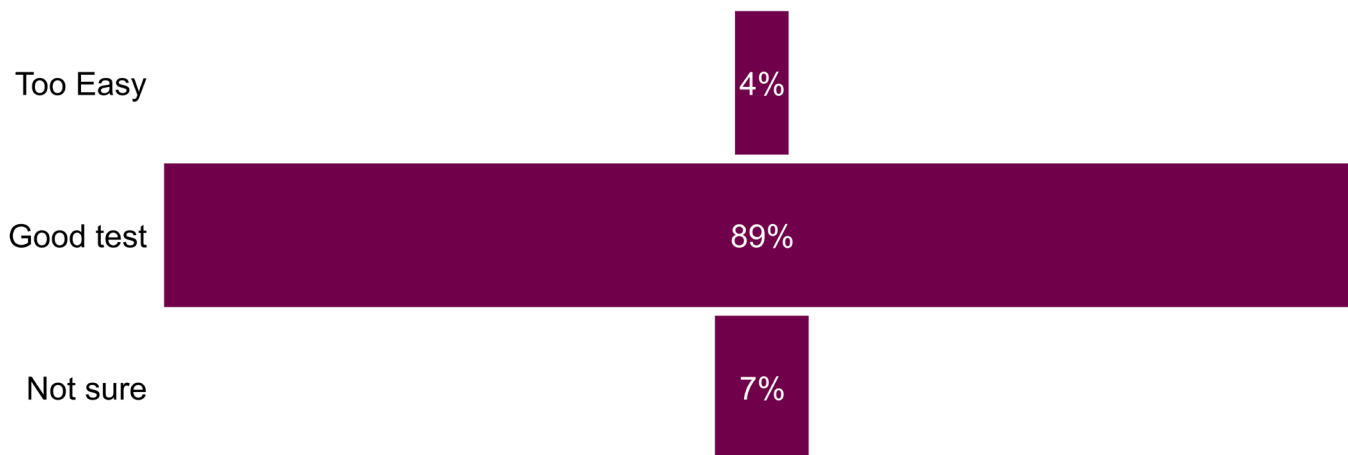
- Breakdown of responses on how Candidates felt that the MCQs were an effective test of their knowledge, experience and judgement



- 72% found the guidance on MCQ Assessment helpful, 7% found it unhelpful and 21% were neutral.
- The top five themes (in descending order) from the free text on MCQS were
 - Some of the questions were confusing/ambiguous
 - The time restriction was stressful
 - There was a good range of questions
 - The questions were not relevant to the AL applied for
 - The time limit of the test was good/appropriate

Online Scenario Tests

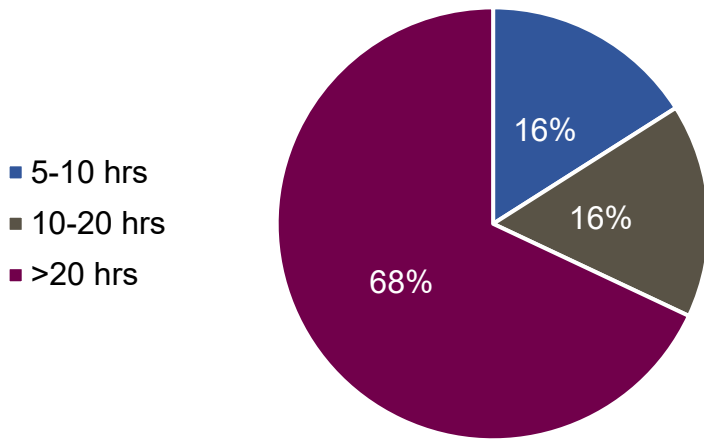
- Breakdown of responses on how Candidates felt that the OSTs were an effective test of their knowledge, experience and judgement



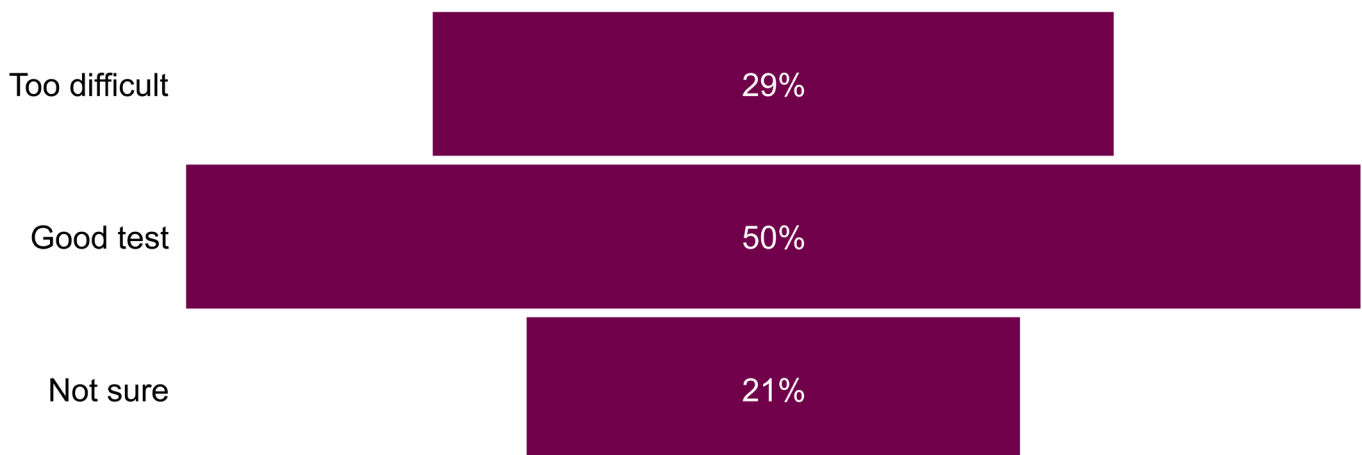
- No one found the OSTs 'Too difficult'
- 71% found the guidance on OST Assessment helpful, 7% found it unhelpful and 22% were neutral.
- The top five themes (in descending order) from the free text on OSTs were
 - Poor quality of photos/visuals
 - The guidance was unclear
 - Insufficient time to properly answer the questions
 - OSTs were a good approach to testing competence/skills
 - The format of the questions was confusing

Portfolio

- Most Assessors believed the requirements and approach to providing evidence for the Portfolio appropriately proved Candidates' competence.
- Over 60% participants had difficulty in finding the supporting evidence for the competencies and annexes.
 - 25% Candidates found it easy to find the supporting evidence for the competencies and annexes, the rest were 'Not sure'.
- It took the majority over 20 hours to compile their Portfolio

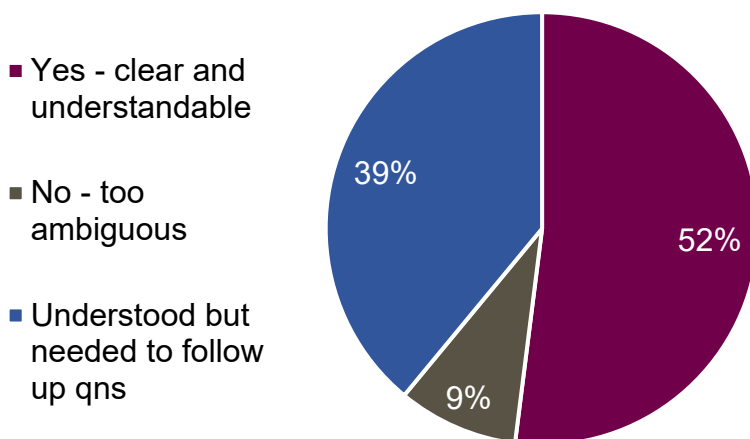


- Nearly 60% felt that the Competency Statement was a good approach to evidencing their competence.
 - Less than 20% disagreed and the rest were 'Not sure'.
- Breakdown of responses on how respondents felt that the Portfolio stage was an effective test of their knowledge, experience and judgement

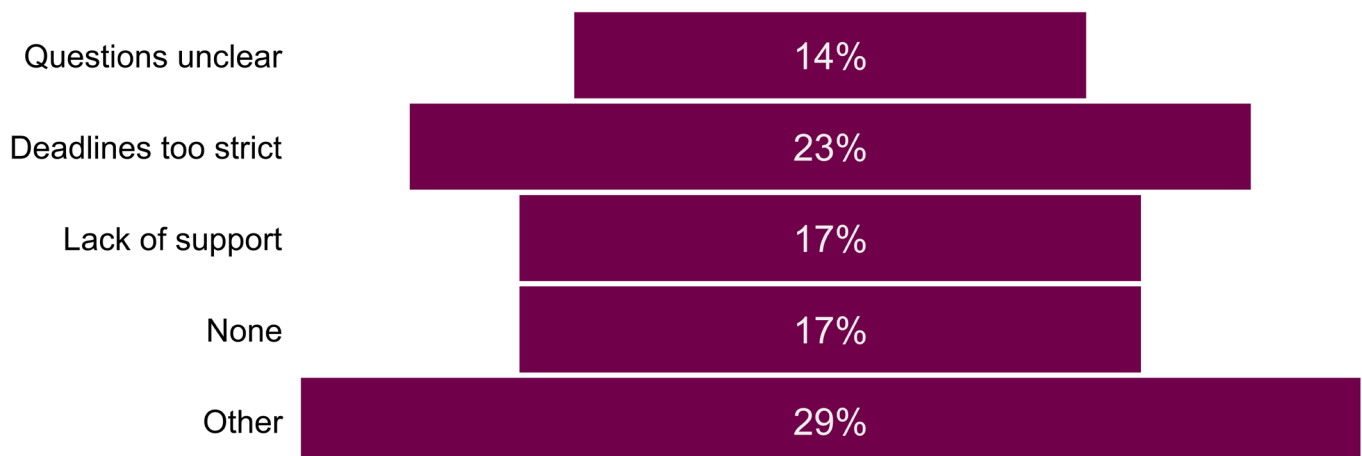


- No one found the Portfolio stage 'Too easy'.
- The top ten themes (in descending order) from the free text on the Portfolio stage were
 - Length of time required to gather evidence
 - Time to complete the portfolio of evidence was excessive
 - Access/unable to evidence casework
 - Unclear guidance
 - Conflict with work commitments
 - The number of supporting documents Candidates could upload was not high enough
 - Poor communications with BER project Team
 - Poor correspondence with/from Assessors/Moderator
 - AL and Species Annex regional bias
 - The whole Portfolio stage was bureaucratic, excessive and onerous

- The degree to which Candidates felt that their Further Information Request(s) (FIR) clearly stated what information/action was required of them



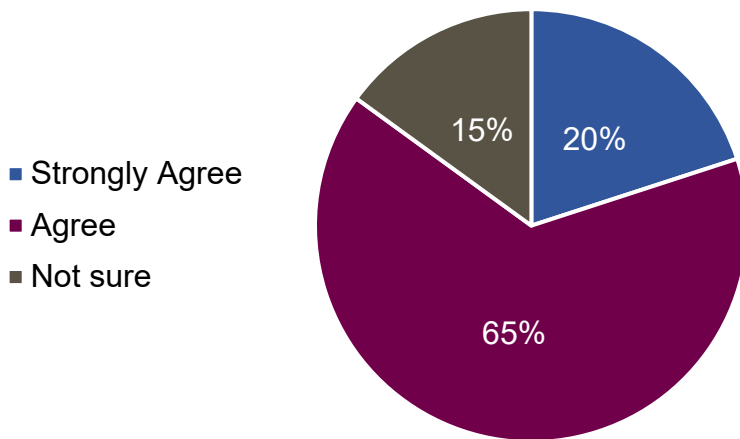
- Over half the Candidates that received a FIR agreed that they were dealt with in a timely manner.
 - 26% disagreed, and the remainder were 'Not sure'
- Reasons selected for aspects of the FIR process Candidates felt were unsatisfactory



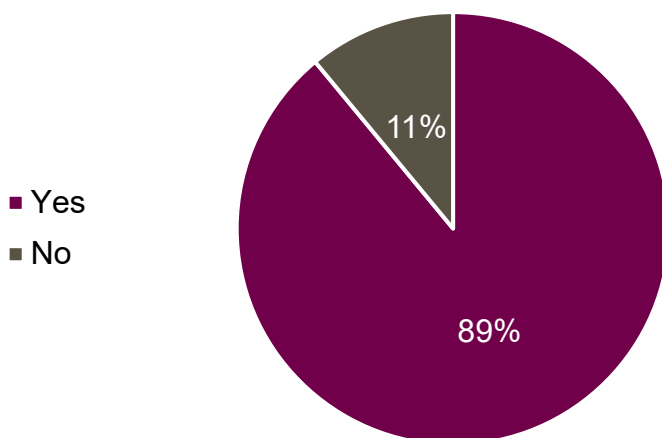
- The main 'Other', free text comments on aspects of the FIR process Candidates found unsatisfactory were
 - irrelevant questions being asked in addition to the information required
 - Assessors' differing approach to authorship
 - the purpose of the questions/unclear guidance
 - Unreasonable timescale to gather evidence and complete FIR
 - Poor correspondence from/with Assessors/Moderator
 - Communication issues with BER Project Team
- One Assessor felt that both the Competency Statement and Competency Indicators best allowed Candidate(s) to best evidence their competence.

Interview

- The extent to which Candidates agreed that the interview was an effective test of their knowledge

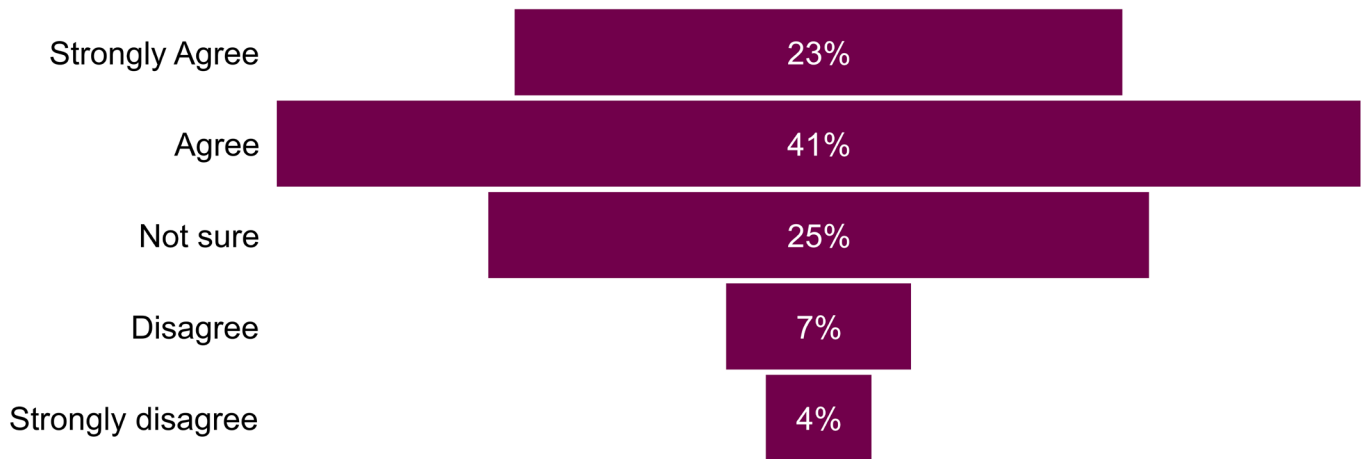


- The themes from the free text on the interview stage were
 - Poor communication around the setting up of interviews
 - Poor Assessor/Moderator interview technique
 - Adequate time allotted for Interview
 - Lack of feedback post interview
- Where comment was made, Partners 'Strongly agreed' that the interview was an effective way to test applicants' competence.
- One Assessor 'Strongly agreed' that the interviews they had held were a useful exercise in capturing a Candidate's competency.
- All Assessors agreed that they were able to use their own experience and judgement to ask additional questions during the Candidate interview.
- Having completed all four stages of the A&A process, the difference between those who agreed with the outcome of their assessment and those who disagreed is shown below.

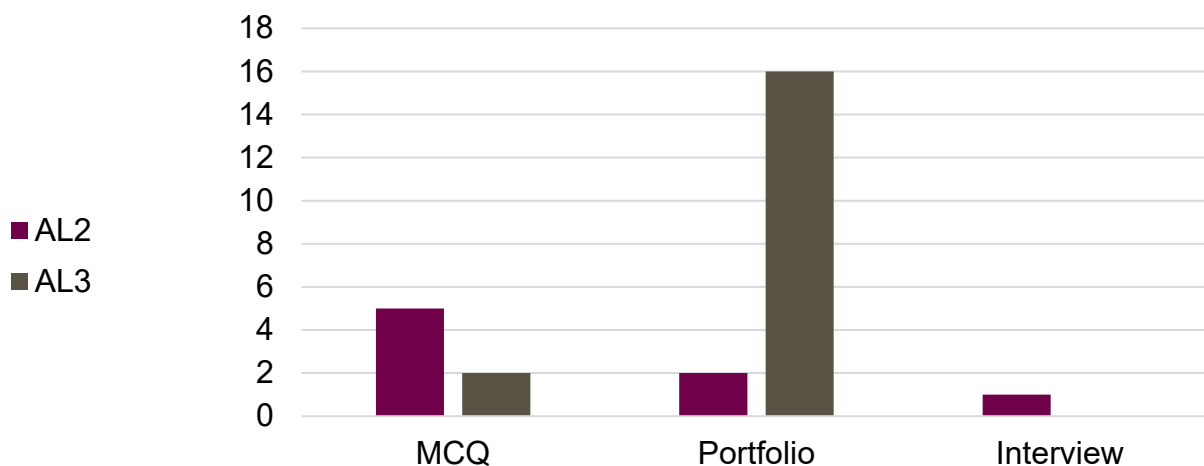


- The Candidates who disagreed were assigned a lower AL than they applied for. Reasons cited were 'Unclear guidance', being marked unfairly, and 'Not sure'.

- Separately, 89% Accredited Bat Consultants thought that the assessment process was a fair and robust assessment of their competence, said 'Yes'. 11% thought not.
 - Of the Candidates who were unsuccessful at any stage in the A&A process, 11% thought that the assessment process was a fair and robust assessment of their competence. 89% thought not.
- The extent to which participants considered their Assessor(s) to be fair

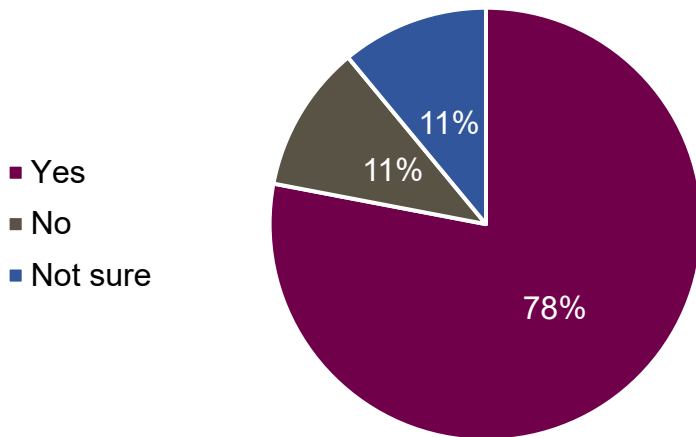


- The stage at which Candidates left the A&A process (everyone passed the OST stage).



- The main reasons Candidates gave for discontinuing were
 - process too time consuming, including too tight timescale for providing information
 - poor attitude of the Assessor/Moderator
 - unable to provide sufficient evidence
- If they were to apply for Accreditation through Earned Recognition again, the areas in which Candidates said they would need additional support were
 - 45% clearer guidance documents
 - 22% longer FIR deadlines
 - The remaining 33% included consideration over access to evidence where ecologists had moved jobs, clearer signposting to find the information required to answer the questions and more time for working online.

- Answers to “Do you consider Bat Earned Recognition to be a positive step forward?”



- Reasons why not included automatic qualification for ecologists who had held bat licences for a number of years, and BER is too inflexible.
- 56% said they were optimistic about the development and release of BER and 33% were not sure.
 - Reasons some thought not included, that BER would be open to misuse, ecologists would not attain the AL they should, and that self-employed ecologists would not have the same opportunity to work on larger-scale, higher risk projects that bigger companies do.

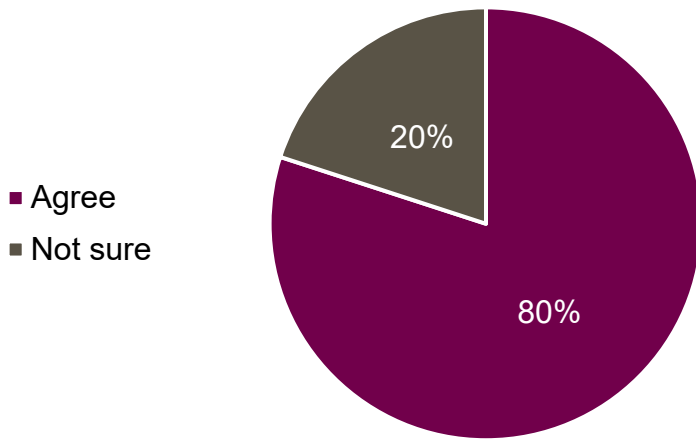
Colleague questions (A6) only

- 31% felt that BER accreditation process could be done in-house
- 31% agreed that the interview is a necessary stage in the A&A process
- The main risks to the roll-out of BER suggested the lack of resource for it to function properly and the loss of candidates due to a lengthy Portfolio/FIR process.

Questionnaires A8 – A10

Assessor role

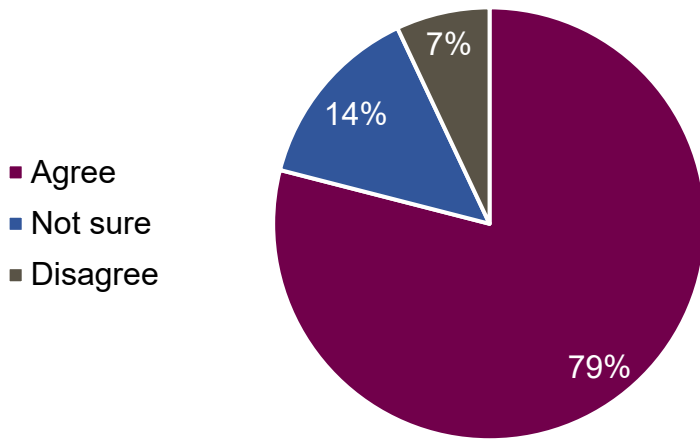
- Extent to which those who responded agreed that the guidance and communication about the remit of the Assessor was clear and fit for purpose



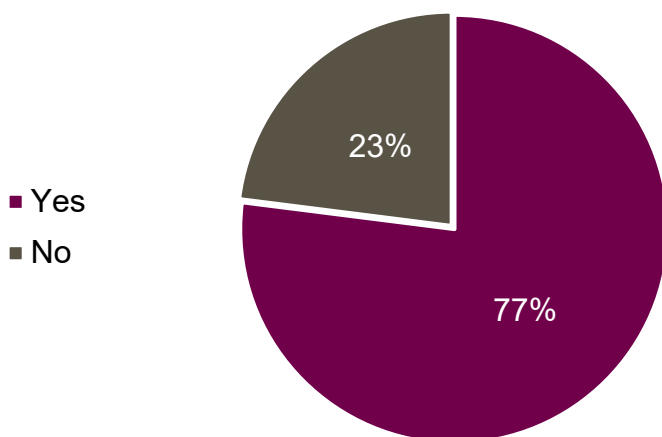
- 100% felt that the CF and assessment process enabled Assessors to carry out a robust evidence-based assessment.
- Most agreed that the assignment of Candidate to Assessor was fair, ensuring no conflict of interest (COI).
 - Also, it was felt that Candidates should be advised of the names of their Assessor before assessment begins, to ensure no COI.
- 80% thought that the Assessor remit needed improvement and/or any safeguards, to ensure an appropriate, fair, and consistent approach. Themes for improvement were
 - More training on carrying out unbiased assessments and following Natural England's ways of working.
 - Greater clarity on marking/scoring criteria and applying professional judgment.
 - Definite boundary between what the Assessor does versus what the Moderator gets involved with.
 - Assessors complete a final FIR before escalation to the Moderator.
- Suggested improvements to the Assessor role/process, towards further improving the scheme were
 - A commitment from Assessors to complete a certain number of hours/cases.
 - Fewer dual assessments to speed up the assessment process.

Moderator role

- Extent to which those who responded agreed that the guidance and communication about the remit of the Moderator was clear and fit for purpose



- 100% felt that the BER Pilot approach to moderation enabled the Moderator to carry out a robust and evidence-based assessment
- 64% thought that the Moderator remit needed improvement and/or any safeguards, to ensure an appropriate, fair, and consistent approach. Themes for suggested improvement were
 - Clearer role definition, for example the Moderator does not get involved with technical aspects of the assessment.
 - Develop the process to ensure consistency around marking/scoring.
 - Streamline and standardise the approach to email communication by having all correspondence channeled through a shared mailbox.
- 92% agreed that measures were in place to ensure no conflict of interest arose between Candidate(s) and the Moderator.
- Split in the opinion that the moderation process would benefit from having more than one moderator in place



- Views expressed on the need for some form of continued moderation, and having more than one Moderator were
 - The Moderator performs an essential role in support of Assessor.
 - Moderation is needed to ensure fair judgement and consistency with marking/scoring.
 - Moderation could be better done in-house.

- The role is likely to become too onerous a task for one person, depending on the number of applicants future intakes.
- More than one Moderator to share the workload would also increase access to moderation, for both Assessors and Candidates.
- Having more than one Moderator would reduce bias and be helpful in cases of COI and/or personality clash.
- Views expressed on why more than one Moderator may not be a benefit were
 - one person enables consistency in approach.
 - the size of the intake is not large enough to warrant the additional cost.
- Suggested improvements to the Moderator role/process, towards further improving the scheme were
 - Have one Moderator to lead on assessments and one Moderator to lead on technical issues.
 - Encourage continued dialogue between Moderator(s) and Assessors.

Annex 3 Summary of responses to Site Registration questionnaire

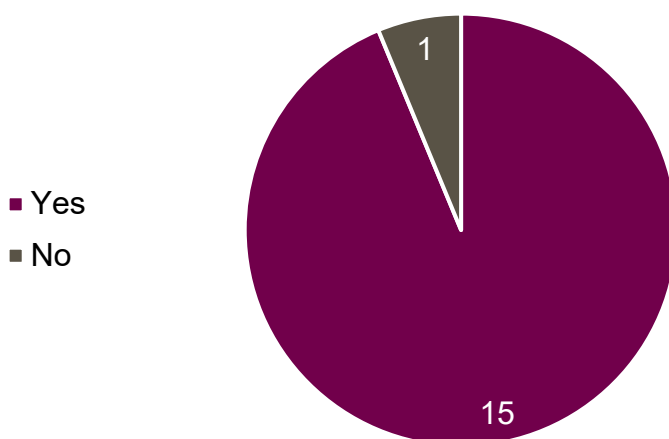
The Site Registration questionnaire (QL1) comprised five sections with questions covering:

- the licensing process
- site registration materials
- maintaining and raising professional standards
- licence return form
- the licensing process overall

By the data collection closing date for the Pilot Site Registration (SR) evaluation⁹, QL1 had been sent to 38 Accredited Bat Consultants on submitting an online site registration for the first time. This represented 67 percent of the total number of Accredited Bat Consultants ('Consultants'). 16 responses were received*.

Section 1 The licensing process

- Number of Consultants who are also a BMCL Registered Consultant



- Of the 15 BMCL Registered Consultants who commented
 - 73% thought that the preparation for the online Pilot SR application process was more streamlined than for the BMCL application process.
 - 100% were of the opinion that the preparation for the online Pilot application process was more streamlined than the EPS-MIT individual licence application process.

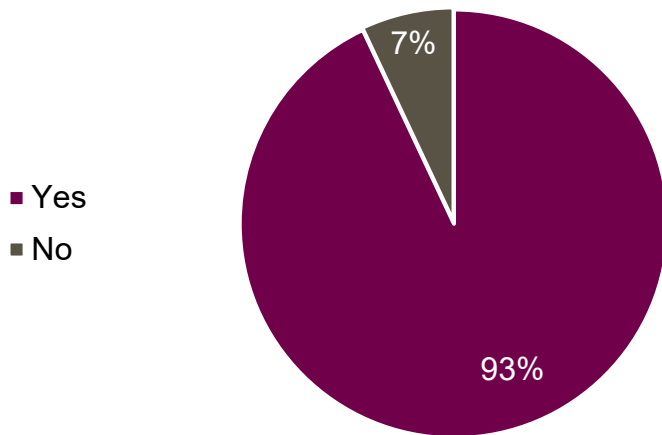
⁹ 5 September 2022

*Not all Consultants answered every request for explanation

- Feedback from all Consultants on the process of actual submission of SR documentation online showed that
 - 67% felt that the process of submitting SR documentation did not reduce the submission time compared to BCML.
 - However, 100% felt that the process of submitting SR documentation did reduce the submission time compared to EPS-MIT individual licence applications.
- The majority of Consultants felt that the online process of submitting SR was sufficiently simple to understand.
- Four Consultants experienced a delay with the licensing process
 - Three were down to the Consultants and their clients becoming familiar with the process.
 - One instance directly involved Natural England, due to technical issues with, and inconsistencies/mistakes in the SR online form. All issues were quickly resolved when BER Project Team were made aware, with no significant delay experienced by the Consultant.
- All the Consultants were happy with the time between the date of submitting the SR form and the date they received a decision.
- 94% felt that the Pilot Site Registration Form was a positive step forward with advantages to clients, proportionate in terms of submitting low impact roost information, and greater flexibility from assurance of timeframes among the reasons given.
- 88% were optimistic about the further development of BER.
 - The other 12% were “Not sure”, believing that the process might become slower as more Consultants use the scheme.
- One Consultant had to change licensable activities or works for an approved site, which was “very easy” to do compared to BMCL/EPS-MIT individual licence modifications.
 - Of the remainder, 64% said no licensable activities or works needed changing and 36% answered that the licence was flexible enough without the need to change any SR details (demonstrating that the SR form and the licence provide enough flexibility to adapt to situations on site without recourse to Natural England)

Section 2 Site registration materials

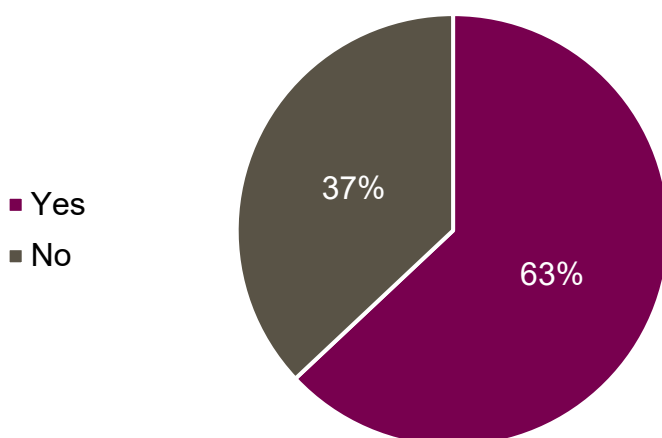
- Percentage of proposals that complied with 'Minimum Expectations'



- 93% proposals complied with 'Minimum Expectations', and 67% Consultants needed the 'Minimum Expectations' guidance document when creating their mitigation and compensation plans for the Pilot site registrations.
- Everyone found the 'Minimum Expectations' document either "Very helpful" or "Somewhat helpful" - with one respondent stating "... *the minimum requirements document is fantastic as it helps to standardise all ecologists working to the same level across the board.*"
- Most Consultants needed the 'Bat ER (Pilot) Overview for ER Consultants (CL47Guidance01)' document when using the SR online form.
 - 93% found the CL47Guidance01 document helpful.
- 100% agreed that the suite of guidance documents relates to the licensing process was sufficiently clear and fit for purpose.
- The 20% Consultants who received feedback on how to improve the way to input SR data all agreed that the feedback they received was helpful.

Section 3 Maintaining and raising professional standards

- Percentage of Consultants who are aware of the planned increase in compliance checks



- 44% Consultants believed that BER will increase compliance with best practice, commenting that the "*rigorous accreditation process*" will "*discourage deviation from*" best practice and,

because only those persons who are competent to undertake the work are accredited, they will, therefore, be more likely to follow best practice.

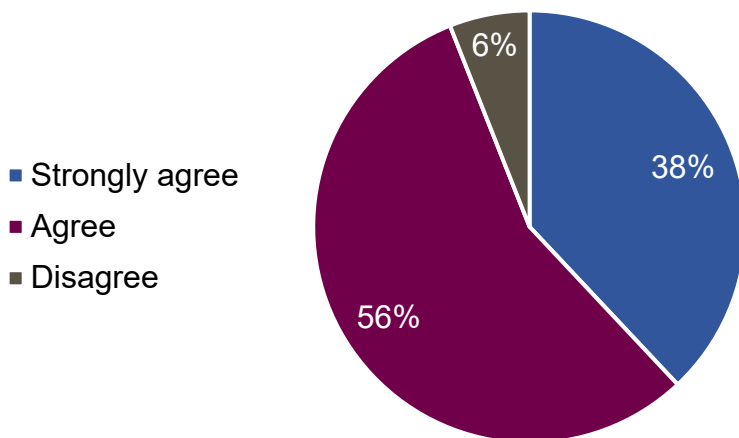
- The remaining 56% were 'Not sure'.
- 69% Consultants thought the licensing process sufficiently robust to ensure that only suitably competent ecologists are accredited, given the “*rigorous*” accreditation process beforehand.
- 94% agreed that the licensing process has the ability to maintain and/or improve outcomes for bats.

Section 4 Licence return form

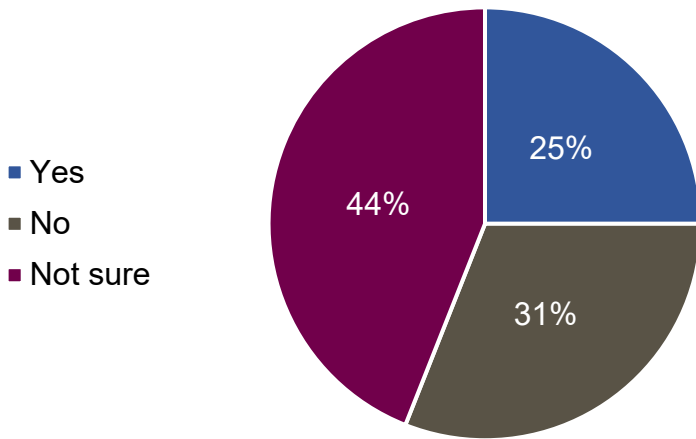
- At the closing date two Consultants had used the licence return form. One was 'Somewhat confident' that the form will collect enough data to monitor the Favourable Conservation Status outcomes of registered sites. The other Consultant was 'Not sure'.

Section 5 Licensing process overall

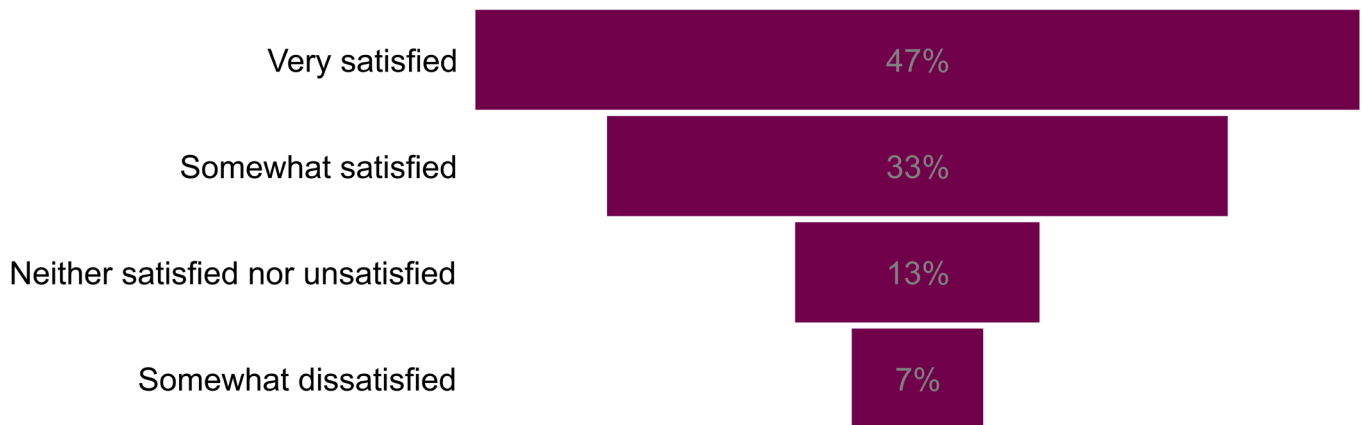
- Percentage of Consultants who fully understand all aspects of the licensing process for BER



- 100% Consultants felt that their knowledge and understanding of applying for EPS-MIT individual licences assisted them in applying for and understanding the Bat ER (Pilot) Class Licence.
- Percentage of Consultants who would have found training in the SR process helpful



- The majority of Consultants likened the BER SR process to the processes for EPS-MIT and BMCL, and found the process “*straightforward*”.
- All the Consultants who said ‘Yes’ suggested online training.
- Consultant satisfaction with the standard of communication with the BER Project Team in regard to SR



- No one answered ‘Very dissatisfied’.
- Suggestions on how Natural England might improve communications to enhance the Accredited Bat Consultant experience included: auto-response email to acknowledge that SR has been received, email correspondence rather than telephone calls for queries and an online profile/area where Consultants can follow the progress of their submission.
- The main suggestion/comment on how the Pilot scheme might be improved concerned the SR form, namely the navigability between pages, using Word format and the ability to complete the forms offline.

Annex 4 Bat Earned Recognition Pilot – Comparison with current Processes¹⁰

Table 1 Comparison of the average time taken by NE 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***	0.83
	Checks and Decision	N/A		Checks and Decision	0.25
	Average hrs total	2.14		Average hrs total	1.33
	Full Time Equivalent (FTE)****	2.51		FTE	1.56
EPS-MIT Low Risk*****	Data processing	1.48	Accreditation Level 2	Data processing	0.25
	Technical Assessment	2.86		Technical Assessment***	1.23
	Checks and Decision	0.90		Checks and Decision	0.25
	Average hrs total	5.24		Average hrs total	1.73
	FTE	3.07		FTE	1.01

¹⁰ Qualitative evaluation summarised from questionnaire results received at 05/09/2022. Total 149 questionnaires sent, 69 responses (46%)

Current system	Staff process	Average time hrs	Bat Earned Recognition	Staff process	Average time hrs
EPS-MIT High Risk*****	Data processing	1.48	Accreditation Level 3	Data processing	0.25
	Technical Assessment	4.00		Technical Assessment***	2.22
	Checks and Decision	0.90		Checks and Decision	0.25
	Average hrs total	6.38		Average hrs total	2.72
	FTE	5.00		FTE	2.13
	Total FTE	10.58		Total FTE	4.70

* Based on number of applications received 1/05/2022 – 05/09/2022 and on number of licence applications received per year (BMCL 1500, EPS-MIT Low Risk 747, ESP-MIT High Risk 1000)

** Based on number of SRs submitted 02/02/2022 – 23/09/2022

*** 48% of total BER cases submitted required no assessment. 29% were targeted assessments and 23% 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 figures available we anticipate BER casework processing takes two thirds of the time taken for BMCL
- Almost three times faster for EPS-MIT Low Risk, and
- Two times faster for processing EPS-MIT High Risk casework.
- However, 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. Previously, an approximate 40 FTE was recorded on ORION bat licensing technical assessments so it would be more accurate to anticipate that BER will be over eight times faster than current systems.
- As a lot of BER casework, particularly low risk cases, will not be flagged for targeted assessment, resources will focus on higher risk cases and compliance.
- The anticipated saving of 5.88 FTE (56%) over current systems will, hopefully, increase with improvements to IT systems. This figure increases to 22.4 FTE based on the ‘actual’ 40 FTE assessment times.
- Should the ambition to have some processes fully automated be realised, costs further reduce to solely IT maintenance.

Table 2 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=68)	Preparation	2.61
	Submission	1.00		Submission	1.18
	Average hrs total	2.00		Average hrs total	3.79
EPS-MIT Low Risk****	Preparation	9.00	Accreditation Level 2 (n=45)	Preparation	3.24
	Submission	0.25		Submission	1.99
	Average hrs total	9.25		Average hrs total	5.23
EPS-MIT High Risk****	Preparation	12.00	Accreditation Level 3 (n=18)	Preparation	6.80
	Submission	0.25		Submission	2.80
	Average hrs total	12.25		Average hrs total	9.60

* Date range 2 February 2022 – 23 September 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 (58%). This will enable an Accredited Bat Consultant to prepare 2 – 3 BER Site Registrations for every EPS-MIT application they prepare, resulting in a much faster turnaround on BER assessment decisions.
- However, 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.
- It is hoped that greater flexibility to change works on site, without recourse to Natural England, and the delay that entails, will offset the extra time needed to submit the BER SR.
- EPS-MIT licence applications simply requires the prepared documents to be emailed to Natural England.

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	15
	Checks and Decision	7.50		Interview prep	0.25
	Average hrs total	18.75		Interview attendance and recording	1.75
	FTE***	22.29		Outcome Reporting, Checks and Decision	2
BMCL Consultant**	Application prep	3.90	BER Accredited Bat Consultant**	Average hrs total	19
	Training attendance	15.00		FTE	22.35
	Online Test Prep****	1.00		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	

* 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)

** From 30% Accredited Bat Consultants

*** FTE based on 1500 applications received and assuming 100% staff time devoted to processing applications

**** Online tests time limited

Evaluation summary

- BER is accessible to all consultants, at any time so no wait for enough successful applicants to run a course, as with BMCL.
- Staff FTE for application processing is almost the same, in favour current systems.
- Whilst staff assessment time is almost the same, BER allows 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**

Current System***					Bat Earned Recognition				
SR Decision	FIR Number	Withdrawn Number	Email signature****	Pass Number	SR Decision	FIR Number	Withdrawn/ Revoked Number	Email signature	Pass Number
BMCL	8	4	12	302	Accreditation Level 1 (n=68)	2	3	5	63
EPS-MIT Low Risk	2	53	50	126	Accreditation Level 2 (n=45)	3	3	7	39
EPS-MIT High Risk	8	9	24	214	Accreditation Level 3 (n=18)	8	1	3	9

* Data range 1 February 2022 – 13 April 2022

** Date range 2 February 2022 – 23 September 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.
- Most of the cases received to date were submitted by BER Assessors, which are likely to be more complicated than mainstream Consultants.

Table 5 Comparison of the pass rate with current systems versus BER

Current System*			Bat Earned Recognition**		
Application outcome	Number Pass %	Number Fail (FIR or not granted) Average annual %	Application outcome	Number Pass %	Number Fail %
BMCL Annexes	98	2	Accreditation Level 1 (n=68)	93	7
EPS-MIT Low Risk	93	7	Accreditation Level 2 (n=45)	87	13
EPS-MIT High Risk	97	3	Accreditation Level 3 (n=18)	50	50

* Date range 1 April 2021 – 31 March 2022

** Date range 2 February 2022 – 23 September 2022

Evaluation summary

- Forecast fewer Email signatures and FIRs with BER, leading to a reduction in delays for the customer.
- A more streamlined service will save staff resources

Table 6 Comparison of targets for Compliance checks for current system versus BER*

Current System			Bat Earned Recognition*			
Compliance Targets	Telephone %	Site %	Compliance Targets of Accredited Bar 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 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.

Appendix 1 Bat Earned Recognition Pilot Questionnaires

The evaluation questions and raw data replies for all the BER Pilot questionnaires, which were used to inform the summary of responses at Annex 2 and Annex 3, are contained in a separate document on the Access to Evidence Catalogue NERR128 Appendix 1 Bat Earned Recognition Pilot Questionnaires.

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