

Regulation of Gas Installer Industry with respect of Safety from 2016

Consultation Response

Stakeholder Name: Michael Meehan

Status: Registered Gas Installer- Skills Trainer & Assessor.

Comment 1. – 3.2.3 Page 18

Financial Structure of a Designated Body.

☐ Currently the Gas SSB is a not-for-profit organisation. Should the Gas SSB, which is designated commencing January 2016:

- a) continue to operate as a not-for-profit organisation; or
- b) be allowed to operate as a profit making business?

Please provide justification for your preferred option.

☐ How should the money which is paid to the CER on termination be used (i.e. do parties agree with the proposal to transfer the reserve to the body which is designated from 2016 onwards)?

Response

- Designated GSSB to continue as a Non-For- Profit Organisation.
- Money paid to CER on Termination should be used for Public awareness campaigns such as roadshows in Urban Public areas and Heightened Media Advertising similar to RSA.
- Additional Fees should be made available to provide further Training and consultation to Installers and stakeholders and create closer links with CER, Designated GSSB, Inspectors, IRP etc
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Comment 2 – 3.3.2 Page 19

Term of Designation.

☐ The CER would like to hear views from interested parties on whether the fixed term for the designation period commencing January 2016 should:

- a) move to five years as originally envisaged; or
- b) remain at seven years mirroring the first term.

Respondents should provide justification for either answer provided.

Response

- Move to a 5 year system-
- Rationale: To achieve Targets set out and if not achieved, appoint Alternative GSSB.
- If Targets and Processes are achieved and that the stakeholders were satisfied ,a seven year period would be acceptable.

Comment 3 -3.4.2 Page 19

Staggered end dates for Electrical and Gas SSBs.

☐ Comments are sought from interested parties on the possibility of having staggered designation end dates for Electrical and Gas SSBs in order to avoid coinciding termination dates.

Response:

ESSB(s) and GSSB(s) should be autonomous-Two different Disciplines.This should be an Internal Decision for the CER and has no prevailing effect on either Gas or Electrical safety.

Comment 4 3.5.2 page 20

Cost Recovery.

☐ Comments are invited from interested parties on the separation of cost recovery between membership fees and certificates.

- Registration fee cost should be sufficient to cover Processing of registration, RGI cards, RGI van logos, Certificate of Registration with unique code,etc. This cost at present is acceptable.
- The cost of the Certificates is a barrier to the registration process and costs should be lowered and an Electronic system be used for Gas installers, Gas Technicians etc who wish to use such a system and retain a paper based system at a reduced cost. To encourage the use of Certificates predominately Electronic Versions would create more Revenue, reducing the GSSB costs.

Comment 5 3.6.2 page 21

Permitted activities

☐ What criteria should be used if prohibiting the Gas SSB which is in place from 2016 onwards from participating in any permitted activities?

- Designated GSSB must not be part of the Training and the Assessment of Installers, and Training and Assessment providers must be approved under QQI requirements.
- Designated GSSB,s roles should the promotion of Competent RGI,s to the public along with building relationships with installers and providing advice if needed.

Comment 6 3.7 page 22

SSB compliance

☐ The CER is interested in comments regarding the introduction of any further measures to ensure Gas SSB compliance with the Terms and Conditions of Appointment and the Criteria Document.

- A feedback mechanism is required to be put in place to measure Stakeholders views of any GSSB been appointed. This shall have an effect on whether the GSSB is effective in its role.
- The Public could have a role in this feedback as well as Installers and Equipment suppliers.
- The SSB primary roles must be to promote Gas and Electrical Safety to the public by only engaging and employing registered installers and Technicians who are paying Registration Fees, Buying Certificate to be issued when competent works are carried out.

Comment 7 3.8.2 Page 23

Investigation of Incidents

☐ The CER would like to invite views from interested parties on who is best placed to investigate incidents involving an issue on the customer side of the meter.

The investigation of Incidents should be carried out by an Individual(s), who have an open mind to the causes to that incident and come to a Independent conclusion based on a number of factors.

Comment 8 3.9.2 page 23

Qualifications of Inspectors

☐ Comments are invited from interested parties on what qualifications Gas SSB inspectors should be expected to hold?

The Individual(s) must have at least 10 years core gas work experience in all areas such as Installations, Servicing, Testing, Commissioning, and demonstrate an ability to form opinions with the option of using teamwork approaches. Good communication Skills and Interpersonal skills would also be a important requirement.

The Individuals must have trade qualifications, Allied to the Gas Industry to QQI Level 6 or equivalent and displaying an in depth knowledge of the Gas Industry. Individuals who can be endorsed by other Individuals in the Industry as a person possessing these skills.

Criteria Document

□ The CER request comments from interested parties on the Criteria Document as it currently stands. In particular the CER wishes to receive views on:

- where any improvements could be made; and
- how the CER should communicate any modifications proposed to the Criteria Document to stakeholders prior to making a decision

- It is the opinion of the Writer that the Criteria Document and its Interpretation of the Statutory Instrument and its amendments does not fully have consideration for the following:
- The CER should be mindful of the Advanced level of Expertise, Experiences and abilities that is present in the Independent private sector of the Gas Industry. With consideration for this, the on-going issue of safety particularly in respect to illegal, incompetent operators carrying out gas works, some who are RGI,s, in domestic dwellings and commercial buildings is unacceptable.
- The views of highly experienced Individuals, with high levels of Competencies and Technical Expertise are not been addressed in the interest of creating an Industry that its core interest is to have experienced, trained, and competent Installers and Technicians be the only individuals and companies working in the industry. The issue of correct training and appropriate training needs to be identified .Also,the attitudes and mindset of Installers and Technician needs to change and the Emphasis on “Duty of Care” must be instilled in these individuals.
- The above will require on-going communication between CER, GSSB, training providers and stakeholders

Technical Standards, Training and Assessments.

□ The CER wishes to invite any comments on the following issues raised in this section:

- Technical standards to which Gas Works must be carried out;
 - Training prior to registration; and
 - Assessments for RGIs
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- The current IS 813 2014 developed meets the expectations of installers and the guidelines Annex, Formative and Normative are clear and concise. The correct Interpretation and understanding of the standard is important for the Gas installers
 - The current Training and Assessments to determine Competency of individual gas installers is a written and practical assessment carried out in a “Simulated Environment”.
 - The present GIS/GID is not an appropriate training course to train a gas installer but a training course to assist in preparation for the GIS/GID assessment. It assumes that the Gas Installer has a Craft Certification in Plumbing etc and core skills and some gas work experience and therefore the successful completion of the assessment leads to a QQI (Fetac) level 6 Summplemental Award.
 - On interviewing and assessing gas installers over a number of years, some individuals who have successfully completed GID assessment, when questioned on their ability to carry out specific work tasks in a real life work environment, were unable to complete these tasks.
 - This is due to a lack of experience.
 - Persons who decide to pursue the occupation of Gas Installer, whether they be through the Trade of Plumber etc or an individual who has changed career direction and wishes to become competent must have access to proper hands-on training in the workplace and mentor(s) appointed to assist the individual achieve milestones in that period of training.
 - The theoretical element of the training can be delivered within classroom and workshop environment and assessed accordingly, but workplace competency assessed on-site in real life workplace environment. This workplace assessment must be assessed by a person competent as a gas installer and be competent to train and assess a trainee.
 - The current re-assessment of RGI,s, some with 20-40 years' experience is valid only if there are significant changes to some elements of a gas installers core competencies such as changes in Soundness testing procedures, Extended Flue installation and inspections, CO alarms etc.
 - The changes as a result in a requirements of a changing Industry and Continuous Evolving and advancements in materials, Appliances, work Techniques etc, could be delivered through Informative arrangements with funds used from CER/ GSSB.

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- Awards such as FAS/City & Guilds are deemed “Awards For Life” .With changes as mentioned above, which are informative issues, to put into question whether an Installer “Remain Competent” in relation to core skills, undermines the Competent Installer.
- Experienced installers could be examined to determine the level of skills and competencies by a simple questionnaire and if training is deemed to be required in any particular aspect of gas installations or aspects of the trade, this training could be developed and delivered by suitable organisations approved by QQI or others.
- If an installer displays elements of poor workmanship, deteriorating standards, this should be picked up by safety Inspections.
- It is however the opposite, that experienced Vocation led Installers and services Technicians acquire a range of additional skills to improve their knowledge which helps them better deal with new technology and “Stay Ahead”.It also helps them develop more efficient business with the ability to train others.

Comment 10 -6.4.2

Electrical Craft Certificates and Categories of RGIs

□ Comments are requested regarding whether the level 6 advanced craft certificate in electrical should remain as one of the craft certificates which would satisfy this requirements for entry to the scheme.

□ Should additional categories of registration be introduced into the scheme?

□ In the event that there were additional categories, what should these be and what should be the qualification requirements for each category?

- The Trade of Electrician, should not remain one of the craft Trades to satisfy the entry to the RGI scheme.
- The trades of Plumbing and Refrigeration and more allied to gas fitting as both trades involve installation of Pipe work to convey liquids and gases, and the testing of pipe work with liquid and gaseous mediums.
- However, a conversion programme, through on-site experiential training and assessments and off-site theory and assessments, could deem an electrician competent in pipework systems used for conveying gaseous mediums in particular.
- Subsequently, Plumbers/heating technicians could also complete a conversion programme through on-site experiential training and assessment and off site theory training and assessment to be competent to carry out all electrical elements of heating and gas installations.
- Additional Categories is a must as different disciplines of works have different requirements.
- Categories
 - Gas Appliance installer
 - Central Heating Installer
 - Central Heating Service and Commissioning Technician.
 - Commercial/Industrial Gas Installer
 - Commercial Gas Service and service Technician
 - Multiple Competency Gas Technician
 - Domestic Gas Inspector.
 - Commercial/Industrial gas Inspector

Certification

□ Comments are invited regarding the certification system. In particular, comments are sought on the possibility of introducing electronic certification. In this regard, if electronic certification were to be introduced, comments are sought on whether it should be:

- (a) mandatory for all RGIs but brought in on a phased basis;
- (b) a dual system should operate whereby RGIs can choose to use the electronic certification system or the paper based system or
- (c) mandatory for certain groups of installers.

- Electronic Certification welcome
- Dual system initially agreed
- Help reduce costs and cost passed on to Installers & Technicians
- Improve efficiency.
- Better record keeping

Gas Works by Unregistered Individuals

□ Comments are invited from interested parties to provide specific suggestions on additional actions that can be taken in detecting unregistered individuals who carry out illegal Gas Works.

Better more effective public awareness.

Register of Gas appliances serial numbers to be supplied by merchants to GSSB

Serial number of appliance installed added to conformance Certificates

Serial numbers to be recorded on Service call.

Insurance companies covering dwellings and commercial premises should highlight that gas work only be carried out by RGI and include in terms and conditions.

A requirement stating all gas appliances be serviced and Inspected annually in private, local authority dwellings and all dwelling homes where the appliances are installed within or part of the building.

More effective public awareness on CO poisoning and avoidance.

Tax compliance for Installers as requirement ie PPSN and vat number.

CER Appointed Gas Safety Officer

□ The CER wishes to invite comments from interested parties on the proposed approach of the CER in appointing a Gas Safety Officer from within its own resources rather than from a resource provided by the Gas SSB.

- Gas safety officers been assigned to investigations should be independent and have advanced knowledge of the Gas Industry with a working knowledge of legal implications
- and the operations of courts etc.
- CER to form a panel of suitable candidates by formulating a Profile.
- Consideration must be given to RGIs to act as possible GSO who demonstrate necessary skills and requirements.

Comment 14 – 9.2.6 page 47

Customer Complaints

The CER would like to invite comments from interested parties on whether the interaction with complainants should:

- a) remain as currently outlined in the Criteria Document; or
 - b) be amended to include a requirement to ensure the complainant has more involvement in the process following the initial complaint
- A complainant should have more involvement in a process of a reporting an RGI provided that the complaint is valid and non-malicious.
 - If gas works are questionable and the level of competency of the RGI is in question, an independent gas installer could be appointed to assist in investigation or Gas Safety officer to act a mediator.

Comment 15 – 9.3 page 48

Communication with Stakeholders

- ☐ Comments are invited from any interested parties as to how the CER may best communicate with stakeholders.
- ☐ The CER also seeks comments regarding whether gas installers should play a more significant role in the day-to-day governance of the Gas SSB

- As mentioned in previous comments, It is vital in the interest of public safety in respect to gas works, that the level of communication between installers, CER, stakeholders, Public and Designated GSSB is dramatically increased.
- The majority of companies, small firms and Individuals are 100% behind any initiative that is put in place to ensure that Illegal, non-compliant, Incompetent, Bogus operators are eliminated from been allowed to carry out gas work. This allows Bona-Fida operators to develop and train installers and technicians to carry gas works safely in the interest of Public safety.
- Gas Installers could have a significant role in the running of the GSSB, provided that the aims and objectives is that GSSB RGIs etc work closely and transparently on all issues concerning the smooth operation of Gas Industry and reduce conflict. We are all on one side of this initiative- Promote Safety and Professionalism.
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Comment 16 – 10.3.2

Mandatory Use of RGI Logo

- ☐ Comments are invited from interested parties as to whether it should be made mandatory for an RGI to display the RGI logo on their vehicle

It should be at the discretion of the Installer or Technician but presentation of certificate/card must be produced on entry to a dwelling or other building.

Comment 17 10.3.2

Annual Logo

Comments are invited from interested parties as to:

- ☐ whether references to the year of registration should be included (either as part of or in addition to the logo);
- ☐ whether the Gas SSB should be required to issue revised stickers each year to the RGI (which included a reference to the year); and,
- ☐ whether RGIs should be required to update any logo which they display on their vehicle each year with the stickers provided by the Gas SSB and be subject to disciplinary proceedings where they fail to do so?

Van stickers where displayed on vehicles should have the RGI number and a date that indicates the year of registration.

The stickers could be produced and inserted on documentation such as reports and invoices.

A certificate of registration renewed annually should have similar details.

Unique Identifier

- ☐ Comments are invited from interested parties as to whether a unique identifier e.g. RGI number should be included as part of the RGI logo.

A unique Identifier would be of no benefit on a logo unless the identifier was to be included on certs, documentation etc

Comment 18 – 10.2 page 55

Joint Electrical and Gas SSB

- ☐ The CER invites comments from interested parties on the option of one process being utilised to designate a single organisation as both the Gas SSB and the Electrical SSB.

The appointment of a Joint SSB must be avoided to allow a competitive and suitable tendering process when SSB are been appointed. It creates a limited number of possible operators.

The current operator RGII/RECI is such an organisation and the costs are excessive.

Documented comments Presented by Michael Meehan – Plumber, RGI Reg Gas Installer/ Technician
30 years' experience. 7 years Training experience with FAS, state training agency.
24/07/2014

Signed

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