

Regulation of the Gas Installer Industry with respect to Safety from 2016 – Consultation Paper CER/14/131 – RGII Comments

Section	Subject	Question	RGII Comments
3.2	Financial Structure of the Gas SSB	<ul style="list-style-type: none"> ○ Currently the Gas SSB is a not-for-profit organisation. Should the Gas SSB, which is designated commencing January 2016: <ul style="list-style-type: none"> 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)? 	<p>We favour continuation of the present situation with the SSB operating on a not-for-profit basis. This allows the Body to recover its costs while at the same time these costs and revenues are kept under review both by the Body and by the CER when yearly budgets are approved and audited year end accounts are presented and discussed. Also operating as profit making businesses may distract the Body from concentrating on its core regulatory role. Note, also, that significant savings have been achieved from sharing of services with RECI.</p> <p>Assuming that the Body is designated from January 2016, any surplus money should be retained by the Body for the continuation of the business. If the Body is not designated, any surplus money should be returned to CER less the costs of closure of the business e.g. redundancies costs.</p>
3.3	Term of Designation	<p>The CER would like to hear views from interested parties on whether the fixed term for the designation period commencing January 2016 should:</p> <ul style="list-style-type: none"> a) move to five years as originally envisaged; or b) remain at seven years mirroring the first term. <p>Respondents should provide justification for either answer provided.</p>	<p>We are in favour of a seven years term of designation as it allows more time to focus on improvement/changes to the scheme e.g. inclusion of non-domestic installations.</p>
3.4	Corresponding Terms for both Electrical and Gas SSBs	<p>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.</p>	<p>As we are of the opinion that one organisation be designated for both electrical and gas safety licences, we are in favour of having the designation at one and the same time. This would also facilitate sharing costs if the opportunity arises. See 11.2</p>
3.5	Fees of Registered Individuals	<p>Comments are invited from interested parties on the separation of cost recovery between membership fees and certificates.</p>	<p>It is appropriate to continue with the current system which ensures the total amount paid by the RGI is proportionate to the amount of work carried out.</p>
3.6	Permitted Activities	<p>What criteria should be used if prohibiting the Gas SSB which is in place from 2016 onwards from participating in any permitted activities?</p>	<p>If the permitted activities contribute to an improvement in safety standards/performance and do not impact on the core activities, they should be permitted.</p>

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3.7	Regulating the Operation of the Designated Body	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.	From our experience we do not see any reason for introducing further measures to ensure that the Body complies with the terms and conditions of appointment and the criteria document.
3.8	Investigations of Gas 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.	<p>The system should continue as at present as it has worked well to date.</p> <p>We are not in favour of the proposal to put an onus on the gas SBB to investigate incidents where there is no indication that the incident may have been caused by an RGI or by a non-registered individual since 2009. It is unfair to burden RGIs with these costs when they have nothing to do with the RGIs. The costs should be borne by the customers in the price of gas.</p>
3.9	Gas SSB Inspectors	Comments are invited from interested parties on what qualifications Gas SSB inspectors should be expected to hold?	In addition to the current qualifications requirements, inspectors should have a certificate of competency in gas safety, renewable on a 5-year cycle.
4.0	The Criteria Document	<p>The CER request comments from interested parties on the Criteria Document as it currently stands. In particular the CER wishes to receive views on:</p> <ul style="list-style-type: none"> – 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 	<p>The current arrangements as per Operation Procedure No 2 (Modifications)-have worked well and the Proposed Future Arrangements in 4.1.4 is well capable of continuing this.</p> <p>The criteria document is not the easiest to read and to find specific information. The use of search criteria in an electronic version of the document would be helpful.</p>
5.0	Technical Standards, Training and Assessments	<p>The CER wishes to invite any comments on the following issues raised in this section:</p> <ul style="list-style-type: none"> – Technical standards to which Gas Works must be carried out; – Training prior to registration; and – Assessments for RGIs. 	We believe the current arrangement is satisfactory.
6.0	Registered Gas Installer Membership	<ul style="list-style-type: none"> • 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 	<p>The level 6 advanced craft certificate in electrical should remain as an entry requirement. Additional training in pipework may be required.</p> <p>We are in favour of two categories: domestic and commercial. Additional categories may cause confusion with the public and would be difficult to regulate.</p> <p>For the domestic category the current qualification requirements are satisfactory.</p>

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		<p>introduced into the scheme?</p> <ul style="list-style-type: none"> In the event that there were additional categories, what should these be and what should be the qualification requirements for each category? 	<p>Qualification requirements for the commercial category will be determined following separate consultation by CER.</p>
7.0	Definition of Gas Work and Certification	<p>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:</p> <p>(a) mandatory for all RGIs but brought in on a phased basis;</p> <p>(b) a dual system should operate whereby RGIs can choose to use the electronic certification system or the paper based system or</p> <p>(c) mandatory for certain groups of installers.</p>	<p>We are strongly in favour of an electronic system which would facilitate the monitoring of the return of certificates and help to reduce the administration costs. RGIs should be incentivised (e.g. electronic certificates would be cheaper than paper certificates) to move to an electronic system but a paper based system has to remain in place as an alternative for a limited period.</p>
8.2.2	Detection and Investigation	<p>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.</p>	<p>There should be a targeted campaign to raise awareness of un-registered individuals who carry out illegal gas works, using all suitable media including highlighting the reporting mechanism for illegal gas works.</p>
8.2.4	Gas Safety Officers	<p>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.</p>	<p>We would be in favour of the CER appointing a GSO from within its own resources.</p> <p>The independence of the GSO may be compromised in the eyes of the public where he/she is contracted by the SSB.</p>
9.2.6	Communication with parties that make complaints	<p>The CER would like to invite comments from interested parties on whether the interaction with complainants should:</p> <p>a) remain as currently outlined in the Criteria Document; or</p> <p>b) be amended to include a requirement to ensure the complainant has more involvement in the process following the initial complaint.</p>	<p>a) We believe the system as currently operated is working satisfactorily and we would not be in favour of any changes.</p> <p>b) Attendance by the complainant at the disciplinary hearing is at the discretion of the disciplinary committee. The complainant is advised when the matter has been dealt with by the disciplinary process.</p>

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9.3	Proposed future communication arrangements	<ul style="list-style-type: none"> 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 	<p>We are pleased to note that CER intends to continue to chair the meetings between the IRP and the gas SSB.</p> <p>We would be in favour of having RGI representation on the Board of the SSB. This would provide for better lines of communication between the SSB and RGIs and for Board decisions to be more informed on the issues as they relate to RGIs. The representative(s) on the board should be an RGI. A ballot of all RGIs would ensure each member has a say in electing their representative(s).</p>
10.3	The 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 not be mandatory to display the logo but where RGIs are displaying the logo on their vehicle, they should also be required to display their name, contact details and RGI number. Where RGIs are displaying their name, contact details and RGI number, it should be mandatory to display the RGI logo.
10.3	Annual Logo	<p>Comments are invited from interested parties as to:</p> <ul style="list-style-type: none"> 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? 	The display of the year may give additional comfort to a customer that the RGI is currently registered but in fact this may not be the case. The only real way, is to check if the RGI is listed on the RGII website. It would also create an additional cost and administration burden for both the SSB and the RGIs.
10.3	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.	The unique identifier number would cause administrative difficulties. Where RGIs display signage on their vehicles, they should display their RGI number. See above – 1 st comment under 10.3.
11.2	A Joint SSB for Gas and Electrical	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.	We are all in favour of one organisation with two separate licences as both bodies are involved in safety, use similar processes and can share IT and back office staff. This would result in reduced operational costs and facilitate CER in their oversight role.

