



Appendix 1: Gas Competence Review – Recommendations

Listed below are key points for consideration as identified by respondents to the on-line survey and also feedback received at the validation workshops, one-to-one meetings and overall correspondence with industry bodies. The next steps of the review process is for Industry to determine how these considerations may be implemented as changes to the existing processes and procedures operated by the Standard Setting body for Gas Safe Registration.

Industry representatives have been invited to take part in the process via articles in The Registered Gas Engineer and the subsequent survey carried out on the EU Skills website. In addition to this, representatives who participate in the Standard Setting Function structure i.e. SMB, SCF and GILG will have the opportunity to participate in the process.

Representatives from Industry will be required to explore each 'Area for Consideration' and produce a matrix to include the following:

- ✚ **Recommendation** – provide a definition of the actions necessary to change the current processes and procedures and as a result allow the key points in the report to be implemented.
- ✚ **Benefits** - provide a list of benefits the proposed recommended actions would bring to industry.
- ✚ **Cost Benefit Analysis** – provide an indication of the costs likely to be incurred should the recommendations be implemented.
- ✚ **Responsibility** – identify the personnel or groups responsible for implementing the listed changes.
- ✚ **Timeline** – identify the timescales necessary to implements any proposed changes, including further consultation with Industry.

Next steps:

- a) Complete matrix and return to EU Skills by 30th September 2012
- b) EU Skills to collated feedback by 30th October 2012
- c) HHIC to host a number workshops, starting in mid-November 2012

ESTABLISHING COMPETENCE

6.10 Points for consideration; establishing competence (new entrants)

6.10.1 Current measurement of competence

ACS operating to the standard BS EN ISO/IEC 17024; 2003 is the current method for the measurement of competence within the existing downstream gas industry. Throughout the competence review, although concerns were widely expressed regarding time lost due to retaking ACS assessments and the overall number of assessments covering the domestic, LPG and commercial areas; industry has no real appetite to move away from this standard. However industry expects consideration is given to a number of relevant points:

Areas for consideration:	Recommendation/Benefits	Cost to Industry	Responsibility/Timeline
<p>The industry wants to develop other options that would be similar or equivalent to ACS, which has more flexibility in how they are delivered and managed for registration with Gas Safe Register. e.g. EU Skills proposals for a GCS have been released (see Section 4.4.2 - Alternate option to ACS for employers).</p>	<ul style="list-style-type: none"> • Good idea to produce an alternative scheme, but it would need to meet the rigors of a standard as with BS 17024 • A Group Certification Scheme should be supported with a robust QA system and continual training and assessment. • The introduction of any alternative scheme must meet the national gas safety assessment criteria in full. • The requirements for the decision of an operative's competence must remain impartial for all schemes that lead to Gas Safe Registration. • If a large company conducts internal assessments, does the industry not think the company will automatically pass candidates with heavy workloads lined up? • This could be open to 'manipulation' by company directors and assessors could be put under undue pressure. GCS can only work if external assessors are used, possibly with some form of rotational process so the same assessor is not always associated with one company. • New entrants into the gas industry via a qualification will now gain Gas Safe Registration on successful completion of the QCF diploma without the need for ACS assessments. This is a robust process with sufficient QA. • For those not wishing to enter the industry via a QCF qualification, there has to be a point where competence is established prior to allowing independent work. The initial ACS assessments provide a route for those not engaged with formal qualifications. • The LPG industry would like to move to an alternative system to ACS to achieve a route that takes in 'whole job competence'. • In house schemes could be backed or sponsored by sector council bodies such as Inland Waterways for canal boats or BH &HPA for residential park homes. NCC for touring park homes. 		

	<ul style="list-style-type: none"> Some larger employers may find it preferable to have alternatives to the current ACS arrangements. Would such a company scheme deliver the full range of competence offered by the National ACS Scheme? 		
<p>There is currently a 100% pass mark, although this is supported by several retakes and an ‘open book’ culture. There is scope for discussion on adopting a revised model e.g. changes to pass mark, a ‘closed book’ approach in certain core elements. There are strongly held and widely differing views on this within the industry.</p>	<ul style="list-style-type: none"> Two elements to this: more rigorous for candidates taking the ‘Initial’ assessments and less rigorous for candidates taking the re-assessment. This would be achieved by using more closed books for the initial and less for the re-assessment. The criteria should identify ‘essential requirements’, these should be assessed at 70% pass mark at closed book. Other requirements to be open book also at a 70% pass mark. The 100% pass mark must remain for ACS and all other schemes as the schemes only assess ‘matters of gas safety’. Any reduction in this pass mark will lead to a lowering of standards. A number of questions could be assessed via a closed book regime. However, it needs to be taken into consideration that the current scheme is open book due to the number of technical Standards being assessed against. 100% pass mark should stay as they are all safety related. All questions could be reviewed to ensure they reflect the real life situations gas engineers under take every day, with some questions requiring referencing for the out of the ordinary situation they may come across, requiring the candidate to find the appropriate action or regulation to adhere to. An increase in the closed book approach ought to be included for elements that are basic and fundamental to gas safety, which would require a 100% pass mark. Other areas which are not fundamental to gas safety, such as knowledge of BS and BSEN numbers need not have a 100% pass, maybe 80%. Closed book tests in certain critical areas and a move away from multiple choice 100% pass mark culture. Competent operatives do not guess. Open book assessment allows for operatives to reference standards, manufacturer’s instructions or other normative documents that they would use in their day to day tasks. Closed book assessments could encourage operatives to guess or act in a certain way, even if unsure of their actions. This does not seem to be a culture that should be promoted in the gas industry. With reference to the 100% pass mark, which safety elements would an operative be allowed to miss if the pass mark is lowered? Higher 1st attempt pass mark on theory needs adopted. Reinstate the ‘closed book’ aspects would reinforce any discrepancies in failings on open book pass marks. 		

	<ul style="list-style-type: none"> Given that most mature operatives are not necessarily comfortable in an examination environment it would not be advisable to move to a closed book and pass mark system. The current open book and resit tutoring arrangements are satisfactory from a safety perspective which is the main focus of ACS. All individuals will in any case have already achieved competence through their occupation qualifications. 		
<p>Improve communication in order to develop a clearer understanding of where the legal responsibility for the measurement of competence sits. It is not widely understood within the gas industry or the process by which competence standards are set or changed.</p>	<ul style="list-style-type: none"> Agreed that there needs to be far greater 'Installer Industry' involvement and direction. There needs to be a top down approach from ultimately government through to industry. This is a role for EU skills as the facilitator of the Standards Setting Function and for the Strategic Management Board as the custodians of the competence schemes leading to Gas Safe Registration Could a very brief high level summary be drafted that could be used by CB's, Gas Safe Register, E&U Skills, assessment centres etc. so that all operatives have an opportunity to read this information – those who are interested will read it. LPG competence standards should be set by the industry experts such as UKLPG, IGEM, and not wholly by SSB. This point needs more clarity and may need to be spread out more effectively than magazines or meetings –individual notes via Gas Safe Register. It is essential that the respective responsibilities are clearly identified and communicated including those of the various regulatory bodies such as the HSE. Believe this is a communication issue between EU Skills and the rest of the world. I believe this is a problem as most engineers are not fully familiar with who EU Skills are let alone what they do 		
<p>Highlighting and promoting the role of the SSB and its decision making processes will increase understanding and increase levels of engagement across the sector, especially the sole trader which makes up over 80% of all registered businesses.</p>	<ul style="list-style-type: none"> Requires a clearer understanding to who the SSB are. This is a role for EU skills as the facilitator of the Standards Setting Function and Gas Safe Register. Cannot see how this would make any difference. It is difficult enough to get engineers involved in the Competence Review or reading the latest Technical Bulletins – they won't care about whom the SSB is or what they do. Reaching across the sector to highlight & promote the role of the SSB can be achieved only with a multi-faceted approach. When looking to reach sole traders, consideration must be given to their existing touch points – supply chain, manufacturers & assessment centres. Strengthening relationships with these bodies will allow communication channels to be developed. 		

	<ul style="list-style-type: none"> • Sole traders and small employers need to have confidence that the SSB and its related structures has their interests at heart along with others including larger employers. The SSB should be seen as supportive of all businesses including sole traders who make up 80% of all registered businesses and to deliver appropriate arrangements. 		
<p>Once SSB's role is clearly understood, this may lead to an increase in contributions and industry comments in regards to proposed changes/improvements in the future e.g. Sections of industry are unaware of the recent change of S/NVQ qualifications for new entrants to the Qualification and Credit Framework (QCF) introduced in August 2011.</p>	<ul style="list-style-type: none"> • Requires a clearer understanding to who the SSB are. • This is a role for EU skills as the facilitator of the Standards Setting Function and Gas Safe Register. • Unless those bodies involved with the SSF engage with the 80% of registered businesses (Sole Traders), not convinced that the role of the SSB will ever be clearly understood. • Will Engineers be bothered? • Use existing networks through Trade Associations and Professional Bodies – do not try to replicate a successful model that already exists. • When inviting comment & contribution from industry, engagement will increase if the mechanism is accessible, quick and easy. Formats such as “Survey Monkey” are useful. • Highlighting previous successes will also show that it is worthwhile taking part & change does actually occur as a result of industry contribution. • Once the SSB has established itself as being aware of the needs and concerns of all registered businesses including the many sole traders and be seen to be delivering appropriate arrangements which meet the needs of those businesses then they are much more likely to engage in the work of the SSB and its related structure. 		
<p>Industry identified that consideration needs to be given to a review of the ‘Standards of training in safe gas installation Approved Code of Practice (ACoP)’ (CoP20) 1988 to reflect advancement in working practices. E.g. The inclusion of combustion analysers is also needed, which are widely used by industry.</p>	<ul style="list-style-type: none"> • There needs to be an understanding of the move from 16 ACOP elements in COP 20 to 117 ACS assessments. • This piece of work is under review and consultation by the HSE • There must be document recognised by industry which sets out the standards for gas training delivery and content. • CoP20 1988 is now out of touch with modern day practices due to the advancement in appliance technology. Emphasis needs to be made on testing techniques of these appliances and associated controls. Understanding combustion analysis and interpreting results is also required. • Every training centre should be working to this as a minimum and adding updates as they are issued – the assessment should also reflect these changes. • All standards related to training and competence need to be kept up to date to reflect working practices. CoP20 under review by HSE. 		

	<ul style="list-style-type: none"> • Old document (CoP 20) that has stood up well over the years and needs to reflect CPA and consider the reinstatement of basic electrical knowledge with modern boilers. • Training in the use of combustion analysers is already incorporated in the plumbing N/SVQs and the N/SVQs are updated at regular intervals to reflect changes in working practices and legislation/regulation. 		
<p>The competence definition needs to be changed to confirm that all installations ‘shall’ be left in a safe condition for use.....’, rather than ‘should’. Also ‘installation’ to be replaced with ‘work’ to reflect the wider scope.</p>	<ul style="list-style-type: none"> • Agreed this is the right move but it will need very careful communication as it has the potential to cause confusion. • Using just the word “work” could mislead, it would read, “all work shall be left in a safe condition” in other words they only have to ensure the work they did was safe, whereas in fact they have to ensure everything gas related is left safe whether or not they worked on it. Perhaps use terminology from GSIUR “all gas fittings and appliances”. • Regarding safety, there should be no ambiguity related to the responsibility of a gas operative when engaged in their roles. If industry feels there is an issue then this does need to be considered. Would the use of “plain English” help remove uncertainty rather than using “legal” terminology? • The definition should be extended to include all gas work in order that all installations and work carried out on them is carried out in accordance with the gas safety regulations. • I agree with the ‘Shall’ part. Surely if installation is safe then not sure what the term ‘work’ would offer if only concerned with Gas Safety. However I can see the need if looking at whole job competence. 		

6.10.2 Routes to enter the industry, encouraging more people and gaining work experience

Apprenticeships, with a significant ‘practical experience’ component were seen by a significant majority of respondents as the preferred route of entry. However, industry mainly understands that this route is predominantly for the 16-18 age groups and is not appropriate for all new entrants. Industry requires a route for mature persons who want to enter or change careers into the gas industry.

Other options are still needed to encourage sufficient numbers to replace those retiring or moving into other careers, but must have sufficient rigour in the approach to training and practical gas work experience.

Industry is concerned that the quality and sufficiency of training as well as a consistent approach to the amount of practical hands-on gas work gained or ‘on-the-job’ experience – for courses such as MLP, are not regulated. Industry considers ‘short duration courses’ seen to be offering just weeks of training (which is predominately only theoretical in content with little or no practical content) to be ineffective routes into the industry.

Industry advised that a major barrier to most new entrants was the difficulty individuals had in being able to gain sufficient depth and range of on-site gas work experience – the essential part to becoming a competent gas engineer. Respondents were aware that many organisations are not recruiting as many engineers as in the past, which may lead to a significant skills gap in the near future.

Respondents were very concerned that young people (especially school leavers) are not being encouraged into practical careers, but are steered towards the academic path. When they are delivered into a practical route; many are unable to get the vital gas work experience needed by working with or for a Gas Safe registered businesses/engineer.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
<p>To help new entrants gain practical work experience, it was suggested it would be beneficial to bring the three constituent parts together for both theoretical knowledge to be applied on-site and vital practical experience gained for the individual. It was suggested that this could be in the format of a framework/infrastructure' which could be developed nationally.</p> <p>This would cover: - new entrants/candidates, - colleges/training providers, and; - Gas Safe registered businesses willing to pass on their gas knowledge, skills and experience.</p>	<ul style="list-style-type: none"> • We should be promoting 'Apprenticeships' at all ages. • For mature persons wishing to join the industry entry should be as rigorous as for those 16-18 groups. The knowledge gas about gas must be the same. • Standards need to be raised for training within the industry and that an industry recognised document would determine and detail the regulation of training for the gas industry. • For new entrants to achieve nationally recognised gas fitting qualifications, access to supervised workplace training is an essential component of those qualifications. Therefore they need to be in employment or supervision of a gas Safe registered business. NOTE: supervision without employment is not readily accessible. • The industry needs to support a model that provides the non-employed apprentice or trainee with supervised workplace training, there will be the need to establish a mechanism that finds and places apprentices and trainees with supervised workplace training providers from Gas Safe Registered businesses. • This already exists in Apprenticeships and MLP's, though the competence of the engineer delivering the practical training ought to be assessed – it's no good being trained by an engineer who teaches shortcuts or who simply is not well-versed with all the correct practices. • Guidance Note 8 outlines what is required, but this document carries no weight and is often ignored by companies delivering short courses or substandard MLP's. In short, these requirements already exist in some cases, but are not correctly policed. 		

	<ul style="list-style-type: none"> • Two routes should be used: <ul style="list-style-type: none"> ○ Apprenticeship schemes – primarily aimed at young people, employed with a Gas safe Registered business and completing a programme of learning and study leading to a nationally recognised industry qualification including improved on site work experience and assessment. ○ Managed learning programmes – for persons, normally, out of the apprenticeship funding age range (over 25's), the candidate would create and complete a 'portfolio of evidence' proving that they have gained suitable work experience that includes both 'off the job' at a college or training centre and 'on the job' with a registered gas installer. • Apprentices are employed – without a sponsor employer there is no apprenticeship. Employers invest in their company when employing apprentices. Government has made significant efforts to increase awareness of and funding for apprenticeships (across a range of sectors). Apprentices working on a recognised framework in the gas industry do have to develop knowledge and understanding alongside practical experience in order to qualify. Qualifications and apprenticeships have a robust QA requirement that ensures standards are met for apprentices. • Gas qualifications that are delivered to new entrants solely in a training centre or college setting cannot lead to Gas Safe registration by themselves and do not meet apprenticeship framework requirements. This type of qualification is suitable to develop knowledge and understanding. As this type of qualification attracts government funding, colleges and other training providers run these programmes. It would be interesting to see the data related to the number of learners registered on funded programmes, that then goes on to become Gas Safe Registered operatives. • MLP with associated experience portfolios provide a variable quality of auditable learner experience without any real 		
--	---	--	--

	<p>standardisation or QA processes. Some of these MLP are focused on ACS criteria & not whole job competence.</p> <ul style="list-style-type: none"> • Learners often have issues sourcing Gas Safe Registered businesses to provide experience opportunities. What is the incentive for the Gas Safe Registered employers to provide this? Developing incentives for employers to provide gas work experience opportunities is one way of ensuring new entrants into the industry are able to develop the experience they need, in addition to the knowledge and understanding that is also essential. • This point greatly depends on the industry sector. If a trainee were employed on boats and installing /servicing basic gas equipment then practical knowledge is gained quickly but on a limited range. • Apprenticeships are not always reliable due to younger age groups losing interest or pay structures during training. There must be regard paid to 'sign of the times' those offering apprenticeships have witnessed failings that dissuade from continuation of schemes. • More detail needed in order to comment but the principle of gaining sufficient practical work experience and having the opportunity to apply theory in practice is worth considering. • I honestly believe this is in a mess at the moment. The ACS is only designed to measure competence and is not a guide of proficiency. Employers should be told not just to recruit employees based solely on their ACS certification. If the assessment covered the areas required by industry and is robust and policed well then there should be no need for entry criteria. 		
--	--	--	--

This would need to be under the umbrella of a 'co-ordination body' to manage the three groups together (e.g. EU Skills).

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
<p>When being recruited into the gas industry, practical skills and knowledge were by far the most important needs for the individual learner. Industry requires clear information regarding what is involved in working in different sectors of the gas industry. Also straightforward communication regarding how to enter industry will benefit the industry and aspiring gas engineers.</p>	<ul style="list-style-type: none"> • There must be a balance with theory. • This is a role for EU skills and those companies seeking to recruit apprentices and trainees. • Surely a responsibility of EU Skills? Guidance note 8 (if enforced) explains the requirements. • E&U Skills does provide useful information relating to apprenticeships in the gas industry, as do some employers. Improved case studies may improve the communication to new entrants. • For new entrants that are not following an apprenticeship route, entry into the gas industry is less clear. Training providers are one source of information related to routes into the industry – as these providers have a commercial interest (they charge for courses) their information could be viewed as marketing and not impartial. • The SSB should provide clear, impartial information relating to all sectors of the industry. • LPG industry agrees that clear information is required for different sectors of the gas industry and improvements to succession planning for new aspiring gas engineers would be advantageous. • It is not all about a ‘British Gas’ type of entry criteria. Leisure sector gas new entrants will have proven practical skills by having worked within a maintenance team where suitability is confirmed over an extended period of employment in other close related disciplines such as plumbing. • There needs to be recognition that for the majority of new entrant plumbers’ 2/3rds will undertake gas work as part of their N/SVQ and that ACS gas has been a mandatory component of the plumbing N/SVQ Level 3 since the mid-1980s. • This has been difficult in the past. Educational establishments are financially rewarded for preventing school leavers entering the workplace. Until this practice changes young people will never get neutral career advice. Trade test 		

	could be used or they could resurrect the courses designed for 15 yr. olds.		
--	---	--	--

6.10.3 Policing/monitoring new entrants

MLPs were seen by many respondents as a suitable platform for people ‘cross-training’ from their current career/job role in associated engineering and/or building sectors; but industry is concerned that there are no national regulated standards to follow. Therefore, industry considers that inconsistency remains with variations of experience gained before completing these courses (as with ‘short course’ above).

Industry requested that a high priority is considered for a national regulated method of assessing portfolios from MLPs courses and other type of ‘short/fast’ track or ‘foundation courses’ for those candidates changing careers and moving into the gas industry. This needs to be followed by some form of external monitoring to ensure consistency amongst training providers.

Only 18% of Industry considers that current policing of new entrant standards is sufficient. Adequate measures need to be put in place immediately to allay fears especially with short courses e.g. some respondents advised that they had seen the same gas appliance appear in different portfolios.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
National guidance needs to be reviewed for the minimum levels of gas work training received and experience gained for all new entrants; irrespective of their ‘route’ into the gas industry.	<ul style="list-style-type: none"> • Training needs to be regulated and scrutinised and there needs to be a close look at ‘Fast track’ courses into the industry. • ACS guidance note 8 is updated and remains valid. This guidance needs to be reviewed and incorporated into any introduction of an industry recognised document. • Reviewing a candidate's experience over time can be a problem due to the varied work a plumbing/gas engineer can do. Some work is wet work (i.e. radiator fitting, S+Y plan installations) and some engineers do service and repair, so a candidate can be on-site for a long or short time and have different amounts of usable evidence. If a candidate works with a service and repair engineer, he can complete large amounts of experience compared to an engineer who installs combi boilers, so job numbers should be the guide not time. Yet again, see Guidance Note 8 details this. • The knowledge, understanding and experience requirements for anyone in the industry should all meet a minimum level, irrespective of the route in. The standards should allow direct comparisons whilst allowing for different models of training and assessment to be employed. These standards are contained in the NOS. 		

	<ul style="list-style-type: none"> • MLP's should truly reflect the areas of work which can easily be drafted into a nationally recognised format. Timescales for typical experience gaining should recognise exposure to numbers of appliances or installations at hand for each trainee. • It would be helpful to have a consistent and appropriate approach to the minimum number of hour's practical experience which a new entrant is required to undertake in relation to the range of gas work he is likely to undertake. • If the assessment process is robust then it does not matter how much training has been received. Training is a personal this. One person might grasp something quicker than others or the type of work might give a more intense learning curve • Industry requests that training is not only a method to gain entry to ACS to 'pass the exam'. Depth of experience is seen as the key to an individual's level of competence and this can only be gained over time. 		
<p>Industry requests that training is not only a method to gain entry to ACS to 'pass the exam'. Depth of experience is seen as the key to an individual's level of competence and this can only be gained over time.</p>	<ul style="list-style-type: none"> • Training needs to be regulated and scrutinised and there needs to be a close look at 'Fast track' courses into the industry. • Consideration needs to be given to an interim qualification that enables new entrants to get on the ladder. • All routes to Gas Safe Registration require evidence of gas work experience. The amount of evidence and time is dependent on the process of recognition of prior learning. • The publication of the industry document referenced in 6.10.1 will set out the scope of work, time periods for learning inputs and supervised workplace practise. • Training to pass exams should be monitored by the Awarding Bodies and GSR. It is a pointless and dangerous practice. • ACS is not a qualification, it does not check competence to carry out a role, it assesses an operative's competence in matters of gas safety only. Distinction should be drawn between safety assessments and competence to carry out a role. • Employers and members of the public (customers) are only encouraged to check for Gas Safe Registration and there is an assumption that this equals whole job competence. Improved guidance to customers and employers will underpin the importance of qualifications. 		

	<ul style="list-style-type: none"> • In house MLP's should document skills by regular audit, a large organisation should recognise exposure to numbers of appliances or installations at hand for each trainee. • New entrants if undertaking sufficient gas work will continue to gain experience while working with Gas Safe registered business provided the businesses themselves undertake sufficient gas work. • Current quality manual for ACS assessment centres state we cannot train people to pass the assessment. Again experience does not relate necessarily to time. Some engineers will work rarely on gas or only cover a limited scope. 		
<p>Independent third party accreditation could be considered as a way to deliver consistency within MLP/short courses (e.g. by UKAS) and the checking of content contained within portfolios of evidence (e.g. more site visits to check). Training providers commented that regulation may increase cost</p>	<ul style="list-style-type: none"> • Training needs to be regulated and scrutinised and there needs to be a close look at 'Fast track' courses into the industry. • All Gas Safety training programmes (including those associated with NVQs and QCF qualifications) should be subject to approval (recognition) by an appropriate organisation. This does not automatically mean accreditation by UKAS. To ensure consistent delivery, these training programmes will only be available through an Awarding Organisation that has a signed agreement with Gas Safe Register. • Training programmes developed by Awarding Organisations or Certification Bodies which take responsibility for the external quality assurance of those training programmes could be subject to a simple approval process by for example EU Skills/Gas Safe Register. • The Awarding Bodies EV's are not interested in the training, only the assessment, but GSR is interested in the training and the portfolio – that does not make any sense. • Correct policing of a standard practice for the delivery of all training would not necessarily create a cost for training providers – if they are not already delivering training/portfolio building to a correct standard, why are they allowed in the industry? • This approach would bring a closer comparison to qualifications; however, the scope of the MLP would need to 		

	<p>include whole job competence and not just matters of gas safety if true parity is to be reached.</p> <ul style="list-style-type: none"> • The robust QA would drive improvements, support learners and raise confidence in this route into the industry. • Cost may well increase and this should be considered – who will absorb this cost? • Should not encourage ‘over kill’ approach. MLP’s can include site visits and the company /student covers the cost. • New entrants need to demonstrate competence and the level of experience they have. Depth of experience should come in time. Apprentice new entrants are required to provide a minimum level of experience which will be consolidated over time. We should not seek to make any of this more onerous than it needs to be in order to ensure that individuals hold the necessary and appropriate level of competence. • I agree that the MLPs should be standardised through approval. UKAS might be a too onerous route. On-site assessment though is very costly as it is one to one and often does not happen due to unforeseen circumstance i.e. job gets cancelled/not suitable of candidate off sick/not on job. 		
<p>In conjunction with developing consistent certification of new entrants across all routes of entry, there is seen to be a need for sufficient policing and monitoring of all training providers offering such training and assessment regarding gas work.</p>	<ul style="list-style-type: none"> • Training needs to be regulated and scrutinised and there needs to be a close look at ‘Fast track’ courses into the industry. • The activity of training programmes being approved (recognised) must remain a completely separate function from that of certification and assessment. • Training providers will be subject to external quality assurance by the Awarding Organisation. • Many training centres train to pass; centres should be training for competency and, ultimately, employment. Training centres should be training the candidates not just core gas safety but safety with water and electrical systems with fault finding and basic trade skills like brick laying and plastering .The ultimate goal for a gas engineer is not gaining the ACS, it’s the registration with GSR. Why does GSR not play a larger role in visiting trainers and taking a close look at what the training programs consist of? 		

	<ul style="list-style-type: none"> • There needs to be a distinction between training and assessment. For training providers that access funding and deliver qualifications, OFSTED will inspect the provision of training (in England). • In terms of assessment, there is a regime of internal and external verification of centres by Certification Bodies and Awarding Organisations. However, the monitoring of training in centres, offering non-accredited training prior to assessing competence under the ACS route, is not carried out in the same way. This may be made more robust by introducing a transparent standard with internal and external audit. • Approved trainers register required. • Strongly support. It seems that there is a two tier system with some CB's not applying rules. Also things such as miss-sold tech certs should be investigated. We often get candidates who are miss-sold a plumbing tech cert as a way into gas. 		
<p>With regard to portfolios of practical gas work gained on-site, falsification of evidence needs to be minimised or eradicated. A greater level of targeted site inspections will be seen as helping to prevent falsification and fraud.</p>	<ul style="list-style-type: none"> • Training needs to be regulated and scrutinised and there needs to be a close look at 'Fast track' courses into the industry. • A nationally recognised portfolio could be developed and published by for example EU Skills, the details of which would be part of any industry recognised document referred to in 6.10.1. • The industry recognised document referred to in 6.10.1 will set out the site inspection details and frequency. • If the Awarding Bodies EV's measured the accuracy, quality and content of portfolios rather than just the ACS assessment process, this would not be an issue. • If GSR can do it, then why not the EV's? • Those found to be submitting false evidence should have a sanction imposed (suspension from entry onto the register perhaps), those endorsing false evidence (Gas Safe registered operatives) should face sanctions (suspension from the register??) and assessment centres not adhering to agreed assessment standards should also face sanctions imposed by the CB's or AO's. • Should ACS centres be more stringent in their inspection of portfolio proofs? 		

	<ul style="list-style-type: none"> • Is there evidence that there is a “high” incidence of falsification of portfolio evidence? Individuals who have not undertaken sufficient work experience are generally unlikely to pass the ACS assessments. The responsibility for portfolio should be left with the Training providers to manage and with Certification bodies who are subject to UKAS requirements. Again we don’t want or need to put in place expensive inspections processes for what might be relatively few transgressors. • This would be very costly to implement. Again if assessment was considered robust then it would not be required 		
<p>Industry expects that, where the quality of training falls short of industry requirements, sanctions should be developed and applied to those providing the training in order to raise standards overall.</p>	<ul style="list-style-type: none"> • There needs to be a structured process in place to enable this to happen • The industry recognised document referred to in 6.10.1 could detail the sanctions which would be applied by the organisation approving the training delivery organisation. • Agreed – please get on with it!!!!!!!!!!!! • Too many calls from so many individuals who have been sold inappropriate training and ‘shafted’ by unscrupulous training companies. • Training providers delivering funded qualifications do face inspection and sanctions. Centres delivering non-accredited training as a precursor to ACS assessment are not subject to the same regime. If there are shortfalls in training then this may be highlighted via assessment results (assuming robust assessment takes place). • All training providers need to be made aware of the industry requirements for the training and assessment of competent operatives. The SMB/SCF and the relevant sector skills councils or those responsible for the National Occupational Standards need to ensure that these standards are communicated effectively and policed by these bodies. • Agree strongly but who would bear the cost of policing the providers?? 		

6.10.4 Funding for new entrants

Respondents see a need for changes to the arrangements around funding for the recruitment and training of new industry entrants. There is limited awareness and understanding of how to access some of the funding already available. Funding for businesses to recruit and train new starters – especially for sole traders is an area of confusion and appears bureaucratic to the few respondents who have attempted to access any funding. Respondents were concerned that the whole funding issue is deterring

small businesses from attempting to recruit new staff and to pass on their knowledge to others. Many sole traders advised they would now only employ a close family member.

Points raised included requests for some direct funding to be available for the employer to offset the cost of employing, such as salary, various employer insurances, personal protective clothing etc.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
<p>Industry requires clear guidance for small businesses – especially sole traders – on how to navigate the perceived ‘bureaucracy’ in being able to access funds for training/employing new starters.</p>	<ul style="list-style-type: none"> • There needs to be a central source for all funding and users able to determine what funding is available to them given their status. • EU Skills should provide information to smaller businesses on funding or to direct them to Information on government funding being available from the Skills Funding Agency (SFA) The SFA policy and schedule of available funding for example 2012/2013 is currently available on the SFA website. • What funding? The only funding available is for Apprenticeships or DWP candidates. There is no SFA funding for Intermediate Gas courses or ACS assessments. • This does need to be made clearer. The Welsh Government has increased and clarified apprenticeship funding for employers recently, could this be a model that would work in the wider UK? • Funding schemes are generally viewed as prohibitive somewhere along the progress line! Most would prefer to leave alone and do their own thing rather than be caught up in bureaucratic circles. • Government funding for mature new entrants is less than for 16-19 year olds and there is a refusal to assist what is deemed to be “statutory” training. This approach needs to be reviewed by Government and the respective funding bodies. 		

	<ul style="list-style-type: none"> • Agree. This is a nightmare for SME's. There are managing agent services around but current policy is to miss out the middleman and direct funding to the provider or employer. Maybe some sort of guidance note is required. 		
<p>Requests for clearer communication as to 'how' and 'where' businesses could apply for potential funding was a recurring theme.</p>	<ul style="list-style-type: none"> • Information on government funding is available from the Skills Funding Agency (SFA) The SFA policy and schedule of available funding for example 2012/2013 is currently available on the FSA website. • This has ALWAYS been the case! Even for a training centre with knowledge of the funding processes, hunting for funding is hard work! • This is a nightmare for SME's. There are managing agent services around but current policy is to miss out the middleman and direct funding to the provider or employer. Maybe some sort of guidance note is required. 		
<p>Respondent's suggestions were made for potential re-allocation or re-distribution of existing funds i.e. not just for colleges/training centres – but also for employers.</p>	<ul style="list-style-type: none"> • This should be explored and it should be made available to employers as well. • Information on government funding is available from the Skills Funding Agency (SFA) The SFA policy and schedule of available funding for example 2012/2013 is currently available on the SFA website. See comments in Section 6.10.2 above. • Employers usually do get direct funding and colleges always get funding – it's the private providers who don't get the funding. • Industry mistakenly believes training centres get funding, but this is not the case. • Employers benefit from having new entrants by gaining additional labour and having an input into their development. The business will benefit from this investment. Colleges & training centres do not have this benefit and do need resources to allow them to operate. If funding to training providers can be reduced without impacting the delivery of training then this would allow for redistribution of funds to employers. This seems unlikely on any meaningful scale. It may be that additional funding is required for employers – where would this funding stream come from? • Encourage a scheme that fits all and easy to understand and administer. • This might be above our remit!!! 		

<p>Industry feels that additional funding could be sourced from gas suppliers, manufacturers etc. or the creation of a student loan scheme (similar to academic university courses).</p>	<ul style="list-style-type: none"> • Agree with the principle but believe that this should be a government backed scheme as there is no guarantee as to when the loan will be repaid. • Certification Bodies strongly support the concept of sourcing funding from appliance manufacturers and gas suppliers. • However, It is difficult to see the drivers that will lead to such organisations becoming funders of training. • EU Skills should investigate and report on the viability of setting up student loan schemes for apprentices and trainees. • This is the responsibility of EU Skills. They should be lobbying the SFA for funding on behalf of the industry and managing the distribution of funds accordingly. It is unfair to ask suppliers and manufacturers to fund this. • If manufacturers and gas suppliers and other bodies involved in the gas industry are to fund industry wide training, how would their contributions be calculated? Would they be mandatory? This proposal would need very careful thought and administration would be complex. • The concept of a student loan scheme does make sense in principal; learners choose to invest in their own future careers using a loan and pay the loan back when earnings cross a threshold. The detail of this would need to be worked through and would be a shift in the funding of further education and vocational training. • LPG industry does not support the provision of funding from gas suppliers but the creation of a student loan scheme was supported. • Student loan approach would be a real move that would commit students to the learning courses and could be amortised by employers over the time they are active with the company. • It would be good if government and the relevant funding bodies could assist with the considerable and on-going costs of ACS training and assessment. • Sounds more like a government scheme 		
---	---	--	--

MAINTAINING COMPETENCE

7.9 POINTS FOR CONSIDERATION; MAINTAINING COMPETENCE

Listed below are key points for consideration in relation to 'maintaining competence' as identified by respondents to the online survey and also feedback received at the validation workshops, one-to-one meetings and the overall correspondence with industry parties.

7.9.1 Standards for maintaining gas safety competence

The survey results identify that industry levels of satisfaction with existing arrangements for maintaining gas safety competence for engineers, outweighs dissatisfaction across all three industry sectors, Domestic, Commercial and LPG.

Within the current ACS competence scheme, there are in total 117 assessments (i.e. initial, changeover and reassessments) covering the Natural Gas/LPG Domestic to Non-domestic work range. As each industry sector mainly concentrates on its own competence requirements, there seems to be no real appetite from respondents for a major change to the scheme, or suggestions for any radical change.

7.9.2 ACS; is it fit for purpose for initial gas safety assessment and reassessment?

Specifically relating to the current ACS system (BS/EN 170240), nearly 8 out of 10 respondents believe that ACS competence assessments are appropriate and are fit for purpose for domestic gas safety.

For the Commercial and LPG sectors, it was slightly lower at over 7 out of 10 respondents.

However, 2 in 10 within the industry are dissatisfied with the current ACS scheme. Suggestions for improving the current 'one size fits all' of ACS scheme, included measurable and validated CPD to be part of an overall measurement of competence (see *Section 7.9.3*, *Section 7.9.4* and *Section 7.9.5 Areas for consideration*).

7.9.3 Survey comments – 'Reassessment not being fit for purpose'

Industry confirmed that cost is a significant factor. The vast majority of attendees at the validation workshops (sole traders and small businesses) take pre-reassessment training at their assessment centres - before taking their ACS reassessment. Pre-assessment training is not mandatory.

Although training and actual reassessment are separate costs, many businesses bundle them together and perceive that they are, along with the cost of non-productive time off work, part of the overall financial burden of being reassessed.

However, from various workshop discussions, there is a perception that some assessment centres are directing candidates to their separate in-house training option, before re-assessment rather than just offering re-assessment as a standalone option. The inference here is that some ACS centres are making unnecessary additional financial gains.

There are concerns within industry that the five yearly ACS re-assessment is being used as the time for many to catch up with industry changes. Many respondents believe this is wrong and a system to update businesses regularly should be explored other than articles in trade magazines.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
<p>The current 5 year re-assessment time period. Although the majority of respondents are not unhappy with the current scheme, there were requests for flexibility and or for different options. Some called for annual reassessments for those wishing to be assessed each year. For those who felt that formal re-assessment were too frequent, suggestions such as every 7-10 years and other no formal assessments were needed as with other professions (electricians, mechanics, surgeons, architects etc.).</p>	<ul style="list-style-type: none"> • Any reassessment should be based on any changes to industry practice or in legislation of the Gas regulations. There is no need to repeat areas where individuals have plenty of experience and are shown to be competent. It could be risk based and where individuals have many call backs and pose a risk they could be required to undergo a more comprehensive reassessment. Those with a good track record could undertake a shorter refresher assessment focussing on critical safety areas. • The current five year re-assessment time period has proven over the past fifteen years or so to be effective in ensuring that the gas safety competence of operatives is being upheld and maintained. • Certification Bodies would recommend the five year reassessment period remains and that any changes or extensions to that time period would need to meet the requirements of ISO 17024. • ACS could be unitised, e.g. flues and vents unit 1, combustion and CPA unit 2, controls unit 3 etc., these could be gained over a four year period after passing initial ACS and holding the award for 1 year. At the end of the five years the candidate will resit ACS either in its entirety or just the remaining units that the candidate has not completed during the four years. This would mean engineers gaining ACS via the new in house assessment could gain units that are transferable for ACS if the engineer leaves the company and goes to work elsewhere. • The bottom line though is the statement “majority of the respondents are not unhappy”....., so don't change it!!!!!!!!!!!! • Initial assessment should be thorough and should check for practical competence, knowledge and understanding across the range of activity in scope. In order to demonstrate continued competence, more use of simulations and questioning could be considered rather than the current assessment methodology. This would reduce the impact of reassessment on industry whilst ensuring operatives remain competent and up to date with changes. CPD could replace a reassessment cycle although this would need to be robust and provide clear audit trails. The group certification 		

	<p>scheme could provide a solution for mid to large businesses. Many operatives use the 5 year reassessment cycle to prompt update training and opt for ACS pre-training, rather than keep up to date throughout. On-going CPD may actually increase safety in existing operatives by ensuring individuals do update regularly rather than use ACS as a 5 year “refresher”.</p> <ul style="list-style-type: none"> • I guess speaking as a training provider there is no surprise that I support a formal reassessment. I believe 5 yrs is the maximum as things do change regularly and engineers have different experiences with regard to gas work. I believe yearly could be investigated and there is an argument that this could be delivered at the same or reduced cost to industry. Providers would be able to better plan their resources. Assessment year could be themed i.e. flues one year testing the next and bit like the proposed GCS • A risk based approach should be considered for assessment intervals depending on the severity and consequences of the gas engineers segment, although consideration should be given to complacency that is affected over time, as well as new processes and changes to regulations. • HHIC believe the current cycle has merits but consideration should be given to early reassessment if policing of the scheme shows an operative to be weak in certain areas. • Re-assessment period of 5 years is acceptable , however, the content time and cost must be reduced. If the content, time and cost are not reduced then should move to 10 yearly. OR • There is a good argument to have yearly reassessments for the first 5 years and then remove the requirement for re-assessment. • Believe that the 5 yearly re-assessment period should remain there should be a revision of the re-assessment requirement based on the following: • The first re-assessment following qualification should be a repeat of the initial assessment for core and appliances • The second re-assessment should be based on core safety assessments only (no appliances) which cover key changes 		
--	---	--	--

	<p>in legislation and standards (not a repeat of the whole assessment exercise). Re-assessment for this group of operatives would be supported by a CPD programme to supplement the re-assessment programme.</p> <ul style="list-style-type: none"> • If operatives do not want to participate in the CPD activities then a full re-assessment of core activities would be required. • Annual assessment would highlight areas where work was no longer undertaken and should be taken off Gas Safe cards. 26/9 basic requirement 		
<p>Frequent comments were made that re-assessments should concentrate on gas safety changes introduced since the previous assessment undertaken by the candidate and/or those changes made annually (since the previous assessment). Comments also confirmed that core GSIUR 1998 Regulation 26(9) competencies must always be reassessed.</p>	<ul style="list-style-type: none"> • As ACS reassessment currently concentrates on changes to normative standards, working practices new technology and the retention of essential safety knowledge & procedures and ensuring that essential gas safety matters including 26(9) requirements can still be demonstrated by operatives, little or no change is required to be made to reassessment criteria. • The reassessment process is based on the previous HSE competence review and the recommendations of Working Group 3. • The objective of the current Job Practice Analysis (JPA) exercise is to establish whether the scheme including the national gas safety criteria remains fit for purpose. • Engineers lose their core safety knowledge over the 5 years (such as controls, flues, and ventilation) so reassessment should be revisiting the core elements and any changes this is a re-teach every time. • Re-assessment concentrating on recent changes would NOT prove competence • Do not agree. Many of our reassessment customers struggle to do the basics to the book. I believe the assessment acts as a nice little reminder as to what they supposed to be doing. As explained at our meeting I ask candidates applying for a training job how to tightness test. Only one or two have ever described this correctly. • Agree, this should form the basis of re-assessment with some current, relevant regulated training over a 1 day period. • Changes through refresher sessions are required 		

<p>There could be a greater correlation between the amounts of gas work in any given area that an engineer carries out and the frequency with which they are reassessed on that competence. This may lead to an increase or a decrease of frequency of assessment either in an individual element or in overall gas competence. This may require the development of a refreshed overall 'risk model' for the monitoring and maintaining of competence.</p>	<ul style="list-style-type: none"> • Yes, worth considering. Many installers feel that they have to undergo a very comprehensive reassessment which is not necessary given their knowledge, experience and level of competence. It also adds cost to the consumer as training costs are reflected in firms' overall charges. • Sounds good, in practice would it work? - The ACS process is simple, relatively quick and value for money. • The logistics and associated monitoring and recording costs of introducing variable assessment time periods will need to be costed by those organisations with a responsibility for conducting, monitoring and recording operatives' competence as the costs are likely to be unacceptably high. • The introduction of any 'risk model' must be aimed at businesses to assist in identifying training and development needs of operatives. • Not sure who posed this question, but it would only represent a small portion of the industry. It would be like resitting your driving test and not covering hill-starts because you live in Norfolk! • Competency is competency – it needs to be assessed. • If competence in gas safety is to be assessed periodically, it is important that fundamental knowledge, understanding and performance is confirmed as satisfactory. The use of technology could aid this process and make it more efficient – computer based simulations are very useful for this. The assessment could be tiered – if a candidate performs well then an early decision could be reached. If risks or concerns are exposed during assessment, a more in depth 2nd tier of assessment may be applicable. • Just because an engineer is frequently doing gas work does not mean he is doing it correctly. How would the frequency be monitored/policed? This works on inspection but not sure how it would work for competence assessment. • LPG industry agrees and may work if CPD is introduced • Arguably, the less work they are doing the more chance of error due to unfamiliarity. On online scheme may be beneficial. Manufacturer's courses should be able to contribute to this reassessment, particularly if they are CPD. • Disagree – far too complicated and onerous 		
--	---	--	--

	<ul style="list-style-type: none"> Operatives need to take a good look at which work areas they are active in if they have minimal frequencies in certain areas they should not seek re-assessments which would reduce costs and the possibilities of failings 		
<p>Validated industry courses that were developed to include measurable practical and/or knowledge and understanding gas safety elements should be added and included into a 'risk model'.</p>	<ul style="list-style-type: none"> The introduction of a risk model must be aimed at businesses to assist in identifying training and development needs of operatives and not at reducing the need for independent impartial assessment. This principle has validity and in one organisation, could be workable. The level of interaction and logistical considerations for this model to work across the industry would require a high level of investment and on-going intervention. This would be costly to operate and complex to administer. The attendance of a course does not demonstrate competence. How do you know if the candidate has taken the subject matter in or is not just sitting there to get a tick in the box? How would you measure knowledge and understanding without assessment? If it included assessment then the only different to the ACS model is that the engineer would have to attend a training course thus increased cost. Disagree – far too complicated and onerous 		
<p>Industry commented that consideration should be given to different learning styles. There is concern that industry is losing competent operatives who cannot adapt to a 'going back to school approach' in classroom style situations.</p>	<ul style="list-style-type: none"> Yes needs to be considered but not if it compromise quality and content. There is no evidence to support this comment. Assessment centres do not resemble schools, ACS is designed to ensure that assessors and verifiers are competent and qualified and come from the industry. They are trained and monitored to ensure that they carry out their roles in a supportive, professional and positive manner. To date there has been no significant outcry from operatives about how they need to prepare for their assessments by attending the 'classroom' type of training. Different learning styles already exist. If an engineer does not like the idea of going back into a classroom then they will not be competent. They must be able to maintain and continue to maintain competency through learning. This will 		

	<p>probably have been raised by an older generation of engineers.</p> <ul style="list-style-type: none"> • This area for consideration is not clear – unable to comment • This relates to training which at the moment is unregulated. Certainly we have designed a program to cope with all four learning styles. This is something providers should design into their programs but not sure how you could legislate for it unless everyone followed the same training program which again would force everyone to attend training thus increasing costs • A class room style approach does not demonstrate competence and should not be used to determine competence • Agree – Practical 26 (9) checks should form the basis of re-assessment with some current, relevant regulated training over a 1day period. • Too much use of ‘dyslexia’ where the true reason is lack of basic education in school 		
<p>Greater emphasis on practical assessment compared to theoretical questions/tests.</p>	<ul style="list-style-type: none"> • The current balance between practical and knowledge assessment in ACS is determined by the national gas safety assessment criteria. • The ACS Scheme Operational Document supports that knowledge and understanding criteria can be assessed by practical assessment where that is appropriate. • ACS reassessment is predominantly practical assessment by observation and outcome. • The current JPA exercise will determine whether the balance between knowledge and practical assessment is correct. • Theory questions still have their place in the assessment but should be reviewed as they are not always clear or reflect the industry • Existing training centres and other providers are free to train using any methodology that they wish. Initial assessment of learners can take place and targeted learning interventions can be employed – this flexible approach would be more costly to administer but there are no barriers to this if customer demand is there. • Use of different assessment styles is another point entirely. I agree that assessments should reflect the working 		

	<p>practices more closely rather than current tasks and questioning techniques used. Many operatives have difficulty in assessment due to the “wordy” nature of the questions rather than their own competence. Increased space or reduced assessment ratios may result if more practical assessments are used. If computer based scenario questions are used, this may allow for a different assessment approach without reducing assessor ratio and increasing space requirements. ICT investment would be required by CB’s and centres.</p> <ul style="list-style-type: none"> • This could be achieved but would drastically increase costs. Theory questioning is a cheap way of collecting evidence across a wide scope. The cost of increasing the use of assessors and developing additional practical facilities would be passed onto the candidate • The industry feel that a balanced approach should be adopted • HHIC believe this will help to enable operatives to determine when to do something rather than just what. • Agree – Practical 26 (9) checks should form the basis of re-assessment with some current, relevant regulated training over a 1day period. • There are operatives who can be easily assessed through informal interview that includes more practical proof. 		
<p>Internal quality control systems accredited to a recognised standard (e.g. ISO 9000 or any other recognised standard) should be added and included.</p>	<ul style="list-style-type: none"> • I am not sure what is intended here. The current UKAS based system probably has enough quality control content. It more about ensuring quality is delivered. • It is unclear what this consideration is attempting to address. • It is already quality controlled by the Awarding Bodies and their EV’s, then by GSR. ISO would be an expensive challenge when the QA systems are already in place but underutilised. • CB’s and centres do have quality systems in place. This is for assessment. • Quality of training is a separate consideration that should be addressed. • Are we talking about the centres (who already operate a quality manual) or somehow accredit engineers? The latter would again significantly increase costs 		

	<ul style="list-style-type: none"> • Should not be included as it may exclude sole traders • Gas safety is more important but would agree this is an effective monitoring system. • Not sure what this means!! 		
--	---	--	--

7.9.4 Reassessment intervals

For the majority of industry, the current reassessment interval of five years is still acceptable. However, some respondents (94) commented that the five year frequency was too frequent and (33) felt five years was too infrequent.

For ‘newly qualified’ engineers; two thirds of respondents wanted annual re-assessments, due to the perceived lack of depth of on-site experience.

For those recently qualified, there was still recognition that some form of reassessment should take place although views differed as to whether this would be annually or in a five year cycle.

For those ‘qualified for many years’ or approaching retirement; over 4 in 10 felt there should be no competence reassessment.

Note 13

The definitions of ‘newly’, ‘recently’ and ‘many years’ – was not prescribed in the survey and will reflect the respondents own perception of which categories applied.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
<p>More flexibility around the frequency of undertaking re-assessments, either upwards or downwards.</p>	<ul style="list-style-type: none"> • Yes – there is something artificial about everyone undertaking the same comprehensive reassessment every 5 years. • Decrease frequency means lower costs but a higher risk of gas safety standards falling. • Increased frequency means higher costs but a lower risk of gas safety standards falling. • If the majority view the current method as acceptable, why ask the question? • There does seem to be some sense in adopting a higher frequency of assessment for those new to the industry (although an analysis of safety incidents and the experience profile of the gas operatives involved would be needed rather than an assumption or anecdotal evidence that new entrants to the register are high risk). 		

	<ul style="list-style-type: none"> • How do you ensure the engineer is competent? What's stopping an unscrupulous engineers writing anything down It would need to be verified which again would be by some sort of assessment • What would be the basis of the decision? It would need a pre-assessment assessment again more cost and an administration nightmare • HHIC agree that there should be flexibility as much as possible • Re-assessment period of 5 years is acceptable, however, the content, time and cost must be reduced. • If content, time and cost are not reduced then we should move to 10 yearly. • Practical 26 (9) checks should form the basis of re-assessment with current, relevant regulated training over 1 day period. • Believe that the 5 yearly re-assessment period should remain but there should be a revision of the re-assessment requirement based on the following: • The first re-assessment following qualifications should be a repeat of the initial assessment for core and appliances. • The second re-assessment should be based on core safety assessments only (no appliances) which cover key changes in legislation and standards (not a repeat of the whole assessment exercise). Re-assessment for this group of operatives would be supported by a CPD programme to supplement the re-assessment programme to supplement the re-assessment programme. • If operatives do not want to participate in the CPD activities than a full re-assessment of core activities would be required. • 5 years is starting to be accepted as the norm, stick with it and candidates will become accustomed 		
<p>A changed balance; with increased practical focus and less theoretical input.</p>	<ul style="list-style-type: none"> • Yes and focused on key critical safety areas. • Industry stakeholders determine changes to standards and codes of practice. • Certification Bodies support a bias towards observed practical performance assessments wherever appropriate. 		

	<ul style="list-style-type: none"> • Re-Assessment is already more practical than Initial Assessment. • Already answered. Would increase cost dramatically • Practical 26 (9) checks should form the basis of re-assessment with current, relevant regulated training over 1 day period. • Would be greatly welcomed 		
<p>An increased emphasis on recent changes in matters of gas safety; therefore checking that the individual has kept themselves up to date with recent industry changes</p>	<ul style="list-style-type: none"> • Yes this would be more relevant. • Operatives are required to do this as a duty of care; the ACS scheme ensures that this is done. • Each Assessment Centre (and Assessor) should be monitoring and including such changes automatically. The EV's should police this. • The purpose of the re-assessment is to confirm continued competence, not just evidence that operatives are up to date with changes. The frequency of job practice analysis could increase and inform assessments so that they are more aligned to current practice. • The current system already focuses on changes but we would still need to look at other issues as previously stated • There needs to be a balance between the two. • Practical 26 (9) checks should form the basis of re-assessment with current, relevant regulated training over 1 day period. • Refresher sessions prior to assessment should be offered 		
<p>Re-assessments to automatically be as comprehensive and in-depth as the initial assessment – use risk assessment of key gas safety checks (i.e. GSIUR Regulation 26[9] tests) to determine the need for less or more tests/checks to demonstrate competence.</p>	<ul style="list-style-type: none"> • JPA exercise is currently considering this. • Reassessment is designed to cover the following: changes to technology, changes to best practice, changes to standards and underpinning gas safety knowledge and performance. • This is the case already, and assessors will 'dig deep' if a candidate needs further investigation as to their competency. Re-Assessment is already comprehensive enough and meets the industry standards. • If re-assessments are automatically as comprehensive and in-depth as initial assessment, the same assessment structure would be used. This conflicts with the second point that re-assessments should be risk based with tests to determine the level of assessment needed to confirm 		

	<p>competence. There can be no single recommendation from this conflicting area for consideration.</p> <ul style="list-style-type: none"> • Again how is this done without pre-assessment. Again would be costly • HHIC agree that needs to be done to keep up the levels of gas safety. • Absolutely DISAGREE • Start with 26/9 and build up according to assessors view on proving competence 		
<p>There was discussion about how to create a correlation between the frequency of reassessment on a particular category or appliance and the volume of work undertaken by an engineer</p>	<ul style="list-style-type: none"> • Could be a factor but not sure how easy it would be to administer and the related costs of such a system. • Certification Bodies are unable to provide further comment without further access to the outcomes of discussions and how they will be achieved. See 7.9.3 • Unsure of how this could be structured and audited to be a robust and transparent system. It would require every act of “gas work” to be recorded centrally and split into categories so that the database could inform assessment frequency. • Again already answered frequency does not mean competence • CPD may be used to determine frequency of assessment • HHIC believe that the core elements should be fully tested. We think that there could be a greater risk the less a type of appliance is worked on. • Disagree – far too complicated and onerous • Important point where an operative are only involved with a limited range of appliances types. Establish by in review prior to assessments. 		
<p>There were also discussion around dropping reassessment, if the individual can produce clear evidence of measurable gas safety assessments on the range of activities undertaken, e.g. alternative in-house GCSs.</p>	<ul style="list-style-type: none"> • This could be a useful progression where if individuals have no gas infringements and undertaking a reasonably good range and amount of gas work then there is no need for an artificial gas re-assessment – save for a refresher on any changes in legislation etc. • Operatives are required to demonstrate on-going gas safety competence by whatever means set out in the appropriate scheme rules whether ACS or Group Certification Schemes. • The likelihood is that 80% of registered businesses will be unable to produce auditable measurable evidence. 		

	<ul style="list-style-type: none"> • Too open to abuse – how could this be evidenced? • A GCS could remove the need for on-going re-assessment using the ACS format. The viability of this type of scheme for SME's and sole traders is questionable. The complexity of administering the scheme may be more costly and disruptive than ACS. Updates on active GCS would be useful. • This would need to be to the same standard as ACS. Again concern with gaining the right experience from onsite assessment • HHIC agree that other means should be accepted as adequate evidence of reassessment. • Agree in principle, however, how would this be regulated? • Would agree that in house proof is important and if in house audits are available these should count 		
There were discussions around those 'qualified for many years' or 'approaching retirement and removing the requirement to undertake re-assessment	<ul style="list-style-type: none"> • There is good argument to have yearly re-assessments for the first 5 years and then remove the requirement for re-assessment 		

7.9.5 Maintaining competence and other comments

Many engineers discussed the need to maintain their knowledge of changes to technology and working practices as they are introduced. There was also discussion about how annual or bi-annual training and/or assessment could provide potential benefits in maintaining their competence.

There was appetite for recognition of Engineers' gas safety knowledge and skills attained through other means (other than ACS), which could be part of a risk-based competence process and which has the potential for becoming an individual's gas safety competency records.

7. Maintaining Competence cont.

Industry would welcome flexibility and options to demonstrate an individual's competence – with real-life on-site work to be included as an element of the competence cycle.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
Develop a format for individual gas safety competency record to demonstrate maintenance of an individual's on-going gas safety competence.	<ul style="list-style-type: none"> • This could be optional but would be anxious that we don't increase pressure on installers. Information on work is already collated by GSR. If this is seen as a personal development tool – well and good but we should be careful about imposing further obligations/requirements on installers. 		

	<ul style="list-style-type: none"> • The maintenance of gas safety competence of operatives during the interim periods of ACS reassessment is the responsibility of the registered business. GSIUR 3(1). • Management of on-going gas safety competence is the responsibility of a Group Certification Scheme if such a scheme is introduced. • The ACS reassessment process provides a simple and cost effective method for the self-employed sole trader business (80% of the industry) to demonstrate that their gas safety competence is being maintained. • Certification Bodies believe that the current scheme rules do not support a competency record model. • Great in theory, but engineers will not keep track of this. OK for companies, but contractors will not keep this up to date. • Would this require on-site assessment rather than assessment in an assessment centre? How would the validity of the individual's competency record be checked? • How do you ensure the engineer is competent? What's stopping unscrupulous engineers writing anything down. It would need to be verified which again would be by some sort of assessment. • Good idea however I feel it would be far too complicated and onerous. • On site independent audit based on site preferred. 		
<p>Recognition of any registration inspection processes that have been completed where the business/engineer has been monitored against current standards including RIDDOR adherence, GIUSP adherence, but also any other inspection related history such as on-site complaint investigations.</p>	<ul style="list-style-type: none"> • Not sure if this is relevant. • The GSR inspection process is recognised by UKAS and HSE as supplementary surveillance of operatives continuing gas safety competence. • A decrease in the frequency and content of the GSR inspection process will foreshorten the ACS reassessment period to a period of less than five years. • Notification of non-compliance by Gas Safe Register can affect the validity of Certificates of Competence awarded by Certification Bodies. • Who to manage? • This type of recognition may cover some of the competence assessment criteria, how would the gaps be identified? How would these gaps be assessed? 		

	<ul style="list-style-type: none"> • This risk based approach does have some merit, although the mechanism for analysing the level of risk and subsequent frequency of assessment would need to be robust. Could be a complex model to develop and run. • Still cannot see how this demonstrates competence!! There still must be some sort of assessment • Agree, however, there would need to be a commitment from Gas Safe Register that they could undertake that number of inspections as 'engineers' may request them instead of ACS. • How would this work for a large business? • Job records and logging could be used as demonstration of compliance with RIDDOR 		
<p>Extend re-assessment periods for individuals who have a proven track record of maintaining their competence and have clear records of no justified complaint history regarding unsafe gas work (e.g. consumer complaints, inspections, RIDDOR F2508G[2] etc.).</p>	<ul style="list-style-type: none"> • Worth considering. • The current 5-year reassessment duration has proven to be cost effective, robust and fit for purpose • Certification Bodies strongly believe that any increase in the duration between assessments could result in standards of competence diminishing and put members of the public at risk. • Should the industry consider extending intervals between reassessment, it should be noted that the logistics of managing such a process would be complex and costly due to the requirement for additional surveillance measures and safeguards. • How? Who would police it? Far too open to abuse and false documentation! • This risk based approach does have some merit, although the mechanism for analysing the level of risk and subsequent frequency of assessment would need to be robust. Could be a complex model to develop and run. • Again what is meant by proven track record of maintaining competence? How would you know they have maintained competence without an assessment? If I wrote in a diary read mag two hours went on a manufacturers courses and discussed issues with colleague, does that suggest I am competent. I can't see how it can • Agree and would say after the first 5 years REMOVE the need for re-assessment however we would need to be confident this would be regulated and fair. 		

	<ul style="list-style-type: none"> • How would this work with the larger business? • Believe that the 5 yearly re-assessment period should remain but there should be a revision of the re-assessment requirement based on the following: • The first re-assessment following qualifications should be a repeat of the initial assessment for core and appliances. • The second re-assessment should be based on core safety assessments only (no appliances) which cover key changes in legislation and standards (not a repeat of the whole assessment exercise). Re-assessment for this group of operatives would be supported by a CPD programme to supplement the re-assessment programme to supplement the re-assessment programme. • If operatives do not want to participate in the CPD activities than a full re-assessment of core activities would be required. • No claims bonus approach backed up by site audit proof 		
<p>Include recorded evidence of businesses' internal supervision/quality control procedures that relate specifically to gas safety.</p>	<ul style="list-style-type: none"> • Good to have but nor essential! • 80% of the industry will be unlikely to have in place appropriate, auditable internal supervision/quality control procedures and therefore, this approach would only be deliverable in a Group Certification Scheme and not ACS. • Not something independent engineers will do • See GCS • That relates to the business competency relates to the individual. What happens if the individual joins another firm? Also not sure how having a quality scheme ensures an engineer is competent • Agree and would say after the first 5 years REMOVE the need for re-assessment however we would need to be confident this would be regulated and fair. • Would work well in certain areas such as larger organisations with internal audit systems. Costs greatly reduced for all. 		
<p>Include validated and approved appliance industry courses that contain gas safety information with a form of recorded assessment for the individual.</p>	<ul style="list-style-type: none"> • This would apply to accredited industry courses only and would need to meet all of the national gas safety assessment criteria. This would assist in reducing refresher training prior to reassessment and should not be as an alternative for independent impartial assessment. 		

	<ul style="list-style-type: none"> • It's called ACS and works very well... • This type of recognition may cover some of the competence assessment criteria, how would the gaps be identified? How would these gaps be assessed? • Not sure how this would differ from ACS as there is an assessment. Again would force engineers to do training thus increasing costs • Agree and would say after the first 5 years REMOVE the need for re-assessment however we would need to be confident this would be regulated and fair. • Constant improvement approach is one that adds value to the operative and can be contained in passport type form. 		
<p>Develop industry guidance (simplified/practical guidance) for safe gas work to cover all three sectors, Domestic, Commercial and LPG. Engineers feel that this should be produced in a printable/hard copy version for all to use on site.</p>	<ul style="list-style-type: none"> • The industry already has access to informative and normative documents to support operatives at minimal cost when carrying out gas work. • This already exists and is available from Corgi/Viper/Skills etc. These only sit in the back of the van in many cases. • The availability of reference documents and procedures for operative's on-site use is certainly a potential safety benefit. The various normative standards, BS documents and bulletins etc. used in ACS centres are not commonly available to operatives in the field and have little relevance to day to day operations. The argument for a plain English document, version controlled and readily available is strong. Who would "own" this document and be responsible for its maintenance? Costs could be minimal or even profitable depending on industry uptake. • There are already publications in existence i.e. Viper/NIC books • Not sure about this; could be a good idea but unsure where it would leave industry normative documents like BS, IGEM and UKLPG. Would this 'one book' be the basis of re-assessment • More specific guidance publications required that are not produced where costs recovery is an issue. • LPG, Catering and Boating all suffer from general publications that offer minimal specific information. 		

APPLYING COMPETENCE

8.10 POINTS FOR CONSIDERATION; APPLYING COMPETENCE

This section on Applying Competence is different to the previous two sections (Establishing and Maintaining Competence), as it is focussed on inspection but also the areas concerned raised by respondents reporting of unsafe gas work that is reportable under RIDDORG2, that relate to unsatisfactory gas workmanship and/or gas fittings.

RIDDORG2 and reported related issues were of significant interest to respondents and made up 49% of all comments received.

Listed below are key points for consideration in relation to ‘applying competence’ as identified by respondents to the on-line survey, feedback received at the validation workshops, one-to-one meetings and the overall correspondence with industry parties.

8.10.1 Current reporting system

Overall just over half of respondents were satisfied with the current RIDDORG2 reporting system. A third was neither satisfied nor dissatisfied. 17% of respondents were dissatisfied due to the lack of overall feedback and final outcomes.

However, due to the high level of responses to the two open ended questions within the survey on application of competence (see Section 8.10.2 and 8.10.3), industry strongly indicated that the current system of reporting unsafe gas work requires further modification and additional feedback mechanisms.

8.10.2 Which agencies receive reports of unsafe gas work?

From survey responses nearly three quarters of industry have the misconception that Gas Safe Register receives all gas related RIDDORG2 reports. This was confirmed at almost all validation workshops where several respondents had reported unsafe gas work via RIDDORG2 and were asking ‘why aren’t Gas Safe Register taking any action when we (registered businesses) report them?’

Note 17; *The current system was explained and the changes introduced in September 2011 of how to report under RIDDOR (the change to electronic means where possible). It was also explained that Gas Safe Register will investigate any alleged instances of unsafe gas work – when that information is received.*

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
A clear explanation of the current RIDDORG2 reporting system and recent changes needs communicating to reinforce the message.	<ul style="list-style-type: none"> • Currently being undertaken by HSE • This is a role for the HSE and GSR to promote RIDDOR through newsletters, trade press articles, the Registered Gas Engineer, technical bulletin updates etc. • Any MLP worth its salt will include this already • Development of improved communication channels across the industry would allow messages such as this to be shared. More use of internet and social media would help. Posters displayed in assessment centres would be another option to consider. 		
Include more depth and detail on the systems and principles of RIDDORG2 for delivery in	<ul style="list-style-type: none"> • Currently being undertaken by HSE 		

<p>both initial ACS assessments and reassessments. This would develop greater industry awareness which would aid wider understanding for those reporting such incidents. .</p>	<ul style="list-style-type: none"> • Yes – within limits provided it does not add too much additional content – time and cost. • The understanding of the systems and principles of RIDDOR is one of learning input rather than the need for assessment. • Certification Bodies would not recommend that any significant additional assessment of RIDDOR systems and principles are added to ACS national gas safety criteria. • Training input on RIDDOR should be addressed in the industry recognised document referenced in 6.10.1. • ACS is an assessment of competence for matters of gas safety, is depth of knowledge related to RIDDORG2 in scope of the scheme? 		
--	--	--	--

8.10.3 Experience of reporting unsafe gas work

Survey comments from industry for this particular question generated 19% of all the comments received (2235 in total), with over two thirds commenting on their experience in reporting a RIDDORG2 contravention.

The feedback experience after reporting unsafe gas work was mixed; some reporting positive feedback with action taken by HSE, to others reporting the opposite, slow or no feedback, insufficient action taken and Gas Safe register seeming uninterested and some respondents not bothering to report the incident at all.

The feedback from industry indicates a low level of reporting of unsafe work as most defective work is corrected at the time of the visit. This anecdotal evidence is supported by the findings of Gas Safe Register’s inspection regime which supports the assertion that there is more unsafe gas work than is being reported by engineers.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
<p>Industry clearly identified feedback as essential for those who do report unsafe gas work.</p>	<ul style="list-style-type: none"> • Agree, however, not sure how this would work as it would put extra work on the HSE for feeding back info on RIDDOR reports. • HHIC think this is an important that there is feedback to encourage continual feedback. • Gas Safe Register and HSE should explore methods of ensuring businesses report unsafe gas work and publicising benefits and outcomes of reports. • Although it may be difficult or inappropriate to provide detailed feedback on individual reports, acknowledgement that a report has been logged may help. 	<p>Increase costs</p>	

<p>There was appetite for closer working and better information sharing between the enforcement agencies to ensure a consistent approach when dealing with unsafe gas work.</p>	<ul style="list-style-type: none"> • Agree, would be good to see some consistency from the HSE around the UK • Closer working between agencies would be welcome if it led to improvements in safety standards. The specific details would need to be worked through before any costs could be calculated. 	<p>Increase costs</p>	
<p>Advances in technology creating better data input methods offers opportunities for a streamlined service.</p>	<ul style="list-style-type: none"> • Feel there is a need to split between RIDDOR which is being reviewed by HSE now and a process where 'other' non conformities are reported. RIDDOR can be done electronically so unsure what other data input technologies would be used. • The system needs to start working before consideration should be given to 'streamlining'. • Already online reporting tool 	<p>Increase costs</p>	
<p>Creating a 'one-stop shop' for reporting of unsafe gas work for the gas industry would simplify the process.</p>	<ul style="list-style-type: none"> • HSE is already a one stop shop, other issue should be dealt with by the Gas safe Register • Anything that improves gas safety standards and streamlines processes is a worthwhile aim. 	<p>Increase costs</p>	

8.10.4 Reasons on why RIDDORG2 is not completed

30% (3,455) of all comments received from respondents clearly indicates that industry wants improvements made to the current system which they believe may then increase reporting.

Over a third of respondents confirmed that they rectify the unsafe work at the time, without then forwarding details on and reporting it to HSE.

There is a misconception within some sections of the gas industry that all RIDDORG2 reportable contraventions automatically trigger an investigative action. This disconnects between the perceived purpose and the actual purpose of RIDDORG2 may be one of the contributors to relatively low reporting rates.

Respondents indicate a real appetite for an appropriately and robust reporting system which triggers appropriate enforcement action.

There is also remaining a misconception that when a contravening appliance/fitting has been repaired, it cannot be reported under RIDDORG2.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
Clearly communicate the purpose of RIDDORG2 to all parties; industry, engineers and consumers.	<ul style="list-style-type: none"> • Agree, however, think that some in industry try to use RIDDOR as a way of getting at other businesses within our industry so reduce the effectiveness of RIDDOR reporting. • Certification Bodies agree that this should be pursued. 	Increased costs	
Publish up-to-date and regular summary statistics of gas related RIDDORG2 reportable offences back to industry with analysis and outcomes/actions achieved.	<ul style="list-style-type: none"> • Agree, however, not sure how this would work as it would out extra work on the HSE for feeding info from RIDDOR reports • It is recommended that EU Skills collate and publish information to inform the SMB of trends or adverse effects relating to unsafe gas work and the relationship with the national gas safety assessment criteria. • This would be welcomed and would help raise standards, from an educational perspective and also from a culture of increased vigilance. 	Increased costs	
Reinforce the link between unsafe gas work and incidents.	<ul style="list-style-type: none"> • Agree, however, not sure how this would work as it would out extra work on the HSE for feeding info from RIDDOR reports • Certification Bodies agree that this should be pursued. 	Increased costs	
Publish the cause of major incidents (G1) in order that information can be fed back into training and certification bodies to reinforce the linkage between competence/training elements and 'real world' incidents.	<ul style="list-style-type: none"> • Agree, however, not sure how this would work as it would out extra work on the HSE for feeding info from RIDDOR reports • All training should be based on real-world knowledge and experiences anyway, but any information the GSR/HSE can publish for training centres would be of additional benefit. 	Increased costs	

	<ul style="list-style-type: none">• Qualifications are based on National Occupational Standards, however, analysis and learning from incidents is definitely worthwhile.		
--	--	--	--

8.10.5 Engineer competence

Respondents clearly communicated that their expectation for a new entrant (establishing themselves within the gas industry) or an experienced engineer (working for many years); is the same end result - safe gas work must always be achieved.

The opinion of respondents as to whether engineers apply their competence was 32% 'always' do, 58% 'in most cases' and with 10% believing that 'sometimes yes, sometimes no'.

Industry believes that a lack of 'practical experience' is the main factor when competence is not applied.

Areas for consideration:	Recommendations/Benefits	Cost to Industry	Responsibility/Timeline
<p>There was discussion around motivation. There was awareness that engineers may not be applying their competence which they hold. A number of reasons were suggested, including a lack of sufficient experience (a lack of context), commercial/time pressure on-the-job etc. There is further scope for discussion around reinforcing the link between theoretical and applied competence.</p>	<ul style="list-style-type: none"> • Gas Safe Register should be identifying these issues through inspection and resolving the problem by suspending or removing those who are not applying competences from the register. • HHIC feel that their needs go be more support after the training to aid the application. • More detail required on what the issues really is? • Suggest that employers have a responsibility to improve safety culture within their business by considering human factors to address motivation, commercial time pressures on-the-job • GSIUR 3(1) requires work only to be carried out by a competent person. Where gas safety competence is not being applied for whatever reason and it is brought to the attention of GSR it is the responsibility of GSR to take the appropriate action regarding the continuing registration of that operative and the reporting of that incompetence to the appropriate enforcing authority. • Certification Bodies recommend that scheme rules are amended to ensure that when an operative fails to apply competence they will be in breach of these rules and therefore may be liable for their ACS Certificate of Competence to be withdrawn or their removal from the Group Certification Scheme. • The statement above begins with New Entrants but then refers to experienced engineers! The competence of ALL engineers drops over a period, hence the 5-year Re-Assessment to maintain that competence. 	<p>????</p>	

	<p>New entrants competence is set out in Guidance Note 8 – if the industry changed this documents title to “Regulation Note 8 – Minimum Standards” there would be a clear definition for all training providers/colleges to adhere to.</p> <ul style="list-style-type: none"> • If engineers are competent but choose not to apply their competence because of commercial pressures for example, this becomes negligence and is a separate issue from competence assessments. • The responsibility to apply competence could be reinforced when gas safe cards and ACS certificates are distributed to operatives. This should already be well known to operatives and the cost of this would be excessive in my view. 		
<p>Respondents saw a potential benefit in the mandatory notification of all new gas appliances, as a tool for tracking unsafe and illegal gas work.</p>	<ul style="list-style-type: none"> • Good idea but who pays for it. Organisations make a handsome profit out of Building Regulation notification so this would have to change • Depending on what use is made of this information. Is it available for enforcement checks? • Agree if this leads to better controls and less incidents • Under Building Regulation heat producing appliances are required to be notified to Local Authorities via GSR. It is understood that currently GSR do not use such data for monitoring or tracking unsafe gas work. • Certification Bodies recommend that GSR places greater emphasis on the notification of installed appliances and use data as part of their risk engine. • This would help with installation work and could be an extension of the reporting of boiler installations. What is the split between existing installations and new installations when analysing safety incidents? This fact could inform if this measure is worthwhile. 	<p>Increased costs</p>	
<p>There was also a call for the sale of gas appliances to be restricted to registered businesses/engineers</p>	<ul style="list-style-type: none"> • Good idea, would resolve many problems and potentially massively reduce costs to industry whilst making it much safer. • This is good in theory but has proved very difficult in implementing. However, we do think there is merit in looking at again. • Yes – would at a stroke reduce the number of installations undertaken by no registered individuals? • A voluntary scheme is in place with some appliance 	<p>Increased costs</p>	

	<p>retailers. It is highly unlikely that legislation will be introduced to limit the sale of gas appliances and or fittings to registered businesses only. However, consideration may have to be given to any European Fair Trading Directives.</p> <ul style="list-style-type: none">• I do not know if this would be legal?		
--	---	--	--