



ENERGY &
UTILITY SKILLS

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Gas Competence Review: Recommendations Reports

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Gas Competence Review: Recommendations Report

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1. Executive Summary

Following the publishing of the Gas Competence Review report in 2012, EU Skills has produced this report following further consultation with industry employers and stakeholders. The report contains recommendations generated during that consultation, and also consolidated recommendations to realise changes designed to bring improvements to the processes and procedures surrounding gas safety competence. The methodology of the report applies the approach used by Gas Safe Register in the review by separate examination of three main areas:

- Achieving Competence
- Maintaining Competence
- Applying Competence

Common themes have emerged from the recommendations received by Industry and have tended to impact on projects currently being undertaken by EU skills e.g. HSL56 and in particular the removal of the Approved Code of Practice 20. The corresponding projects have enabled recommendations to be implemented from different inputs but resulting in the same outcomes. The following themes have been included in the approaches suggested for implementing the proposed recommendations:

- **Improved communication:** a number of recommendations were suggested to address the perception that communication with industry needed to improve, but since the Competence Review report has been published, some links have already improved. However, further improvements may be realised through wider use of different communications methods and increased use of existing mediums such as the trade press etc. To implement these changes this report recommends that the SMB appoint a working group to develop and deliver a communications plan.
- **Approved training for new entrants:** this is identified as one of the more significant issues raised in the Competence Review. There is clear industry concern around the current position whereby training for new entrants into the gas utilisation is not regulated or approved by any independent third party. This report recommends that this situation be changed to introduce appropriate self-regulation in this area. This recommendation is supported by changes to the HSL56 documentation and the introduction of a new EU Skills/IGEM 'Framework for Training document'. Subject to further industry consultation and SMB approval, only training recognised as fit for purpose and delivered by recognised Training Providers will be available to gas industry new entrants. This is expected to lead to a significant reduction in the use of "short cut" programmes that increase the risk to consumers and undermine the Gas Safe Register. It is recommended that this process should be managed by the Standard Setting Body and be subject to regular audits.
- **Group Competence Scheme:** a group of recommendations suggest that engineers should prove their competence through an increased number of assessments as an alternative to the current five year cycle. A potential common solution to align with these recommendations is for employers to utilise the new Group Competence Scheme. This scheme will recognise scope of work carry out on a daily basis including the regular training individuals will receive from their employers i.e. briefings on changes in standards could be taken into consideration at a time when an individual has to prove their competence. This route requires a quality management system to ensure the gas safety competence of engineers is adequately managed and recorded.
- **Job Practice Analysis:** a number of recommendations have stated that the content of the ACS assessments and in particular the balance between practical assessments and theory tests needs to be improved. These aspects of the assessment is being analysed as part of the Job Practice Analysis, therefore any outcomes are being incorporated as part of this on-going process.
- **No change:** there have been a number of recommendations that stipulates that no changes are necessary to the existing routes to registration and their associated scheme rules. However, the considerations put forward in the Competence Review Report need to be kept under consideration for changes at a later date. The general feedback indicated that existing practices were adequate and that any changes would attract significant costs and would not achieve an immediate benefit for the Industry.

2. Background

Gas Safe Register facilitated the Gas Competence Review for Downstream Gas Work in 2011/2012 and as a result produced a Competence Review report in 2012. EU Skills have facilitated and managed the next steps of the Competence Review process. These steps have included further consultation with 'Industry' to determine how the 'Considerations' listed in the report could be implemented as changes to the existing processes and procedures operated by the Standard Setting Body for Gas Safe Registration. Industry representatives were invited to take part in the process via articles in The Registered Gas Engineer and a subsequent survey carried out on the EU Skills website. The methodology used stipulated that the findings of the review would form the basis for consultation and that an audit trail would be produced back to the findings of the review and therefore would NOT under any circumstances:

- Question the findings of the report.
- Change the content of the report.
- Only consider the favourable sections of the review.

In addition to this, representatives who participate in the Standard Setting Function structure i.e. SMB, SCF and GILG were given the opportunity to participate in the process.

3. Consultation Process

Following the publishing of the Gas Competence Review report the following steps were taken by EU Skills:

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- Communicated with Industry via the Registered Gas Engineer magazine inviting individuals to participate in the consultation process.
- Interested parties were invited to view the report on the EU Skills website and to complete an online survey to register their interest in the project.
- Held an initial Competence Review workshop to agree the next steps of the process.
- Invited interested parties to complete the Competence review matrix (See appendix 1), therefore providing individuals the opportunity to put recommendations forward along with associated and cost benefit analysis and methods of implementation.
- Held two additional workshops to discuss and provide recommendations for the 'Achieving Competence' and 'Applying Competence' sections of the report, feedback is detailed in Appendices 2, 3 and 4.
To provide recommendations for the 'Applying Competence' section of the competence review, feedback has been extracted from the matrix (Appendix 1).

4. Recommendations Produced from Industry Consultation on Considerations

For the purpose of this report the 'Recommendations' listed in this section have been compiled in a number of strategic groups, the groups have similar outcomes in terms of how the recommended change will be implemented and the likely cost to industry:

Each of the Recommendations listed in Appendices 2, 3 and 4 have been given a reference number to enable an audit trail back to the Gas Competence Review report.

4.1. Establishing Competence (Gas Competence Review report: Section 6)

4.1.1. Communication:

- **Recommendation (3):** The group have recommended that all forms of communication should be considered to provide a consistent message to all areas of industry e.g. Manufacturers promotions, Social media, Trade Press, On-Line forums.
- **Recommendation (4):** Develop methods of communication that will enable a wider view to be expressed, particularly from a sole trader perspective. Currently the Registered Gas Engineer magazine is used, consideration needs to be given to other forms of communications.
- **Recommendation (5):** Increase communication levels through the channels detailed in the previous recommendations e.g. Trade press etc.
- **Recommendation (8):** Improve communication to potential new entrants to the industry. Developing a standard/approved framework as described in previous consideration would help to give more clarity and therefore be easier to communicate.
- **Recommendation (16):** Funding requirements to be made clearer and more accessible to Industry.
- **Recommendation (17):** Covered by previous consideration/recommendation

Consolidated Recommendations and Actions: Establish a working group with existing stakeholders to consider the improved methods, and look at past case studies to establish whether such methods would be successful. Methods need to be introduced in addition to the current practices. Although improvements have been made over the past four years for example the use of on-line forums, the use of untapped media channels such as the trade press should be utilised more. There are a number of Trade associations currently involved with the SCF and it is envisaged that reaching agreement on the way forward should not prove to be too onerous. In terms of costs, these could be kept to a minimum as existing communications sources will be used rather than introducing new ones. The timescale for the project is for measurable improvements to be made by the end of 2013.

4.1.2. Approved Training, MLP's etc.:

- **Recommendation (2):** The group felt that the 100% pass mark should be maintained with the following provisos: 100% pass mark for all essential for core gas safety elements, some closed book questions for essential knowledge, open book questioning for reference material.
- **Recommendation (6):** The group suggested that the ACoP should align to the latest version of GSIUR and in particular the revised guidance and ACoP.
- **Recommendation (7):** Develop and publish a set of national standards for work experience and training for new entrants to the industry.
This should include: i) scope, ii) duration, iii) range, iv) sufficiency, v) facilities, vi) framework.
- **Recommendation (9):** Align to HSL56 Working Group.
- **Recommendation (10):** Develop Nationally Approved Training Standards to apply consistently across all routes to registration

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- **Recommendation (11):** Standardisation of course content to be included as part of the new 'Framework for Training' documents, this document will replace ACoP 20 and will be supported by pending changes to HSL56.
- **Recommendation (12):** The Framework for Training document should stipulate a need for on-going surveillance of all training programmes.
- **Recommendation (13):** Portfolios should be policed under guidance provided by the Standards Setting function and applied under the internal and external verification structure of the CB's. Standards for portfolios will be detailed in the Framework for Training document and the scheme rules as set out in the Operations document.
- **Recommendation (14):** Once that the Industry standards have been agreed and implemented, ACS centres will only accept candidates who have received approved training. The training providers will also be subject to the on-going verification process.
- **Recommendation (15):** Such courses would need to be endorsed under the new Framework for Training document but would also need to outline the amount of training that related to matters of gas safety, otherwise it would prove difficult to connect directly to an proof of competence. This type of Continuous Professional development applies more to re-assessment than achieving competence through an initial assessment.

Consolidated Recommendations and Actions: The themes running through these recommendations will be supported by changes to the HSL56 documentation and the introduction of a new 'Framework for Training document'. Subject to these proposals being implemented then only training recognised as fit for purpose and delivered by recognised Training Providers will be available to gas industry new entrants recognised Candidates using a route that has not been recognised in this way will not be eligible for entry at an ACS centre and therefore will not be able to achieve Gas Safe Registration. The training programmes will be approved against a specification along with requirements of a pre-agreed level of practical training and appropriate amount of on the job experience to achieve for the scope of work they ultimately want to become Gas Safe Registered. The surveillance of the training programmes will be undertaken by the Standard Setting Body along with the responsibility to maintain the scheme rules for all routes to registration. This action will ensure that only recognised training is maintained. The costs for the proposed changes will be predominately met by Industry. However, these costs will be distributed amongst the Training Providers wishing to provide recognised training programmes, and are likely to be passed on to the applicants who wish to enter the Gas Industry. It is not expected that the costs will create a barrier to entry for those seeking to enter the industry but will ensure the quality of the engineer applying for Gas Safe Registration will be improved. The measure will also enhance, over time the credibility of the Register as all new entrants who appear on it will be known to have undertaken appropriate, good quality training prior to their registration. The implementation timescale is dependent on the outcome of the HSL56 consultation, but a number of changes will be made to the scheme documentation by the end of the year with an implementation date at assessment centres expected by April 2014. There are existing working groups looking at proposed changes to the scheme documentation for ACS therefore any additional changes will be incorporated in this work activity and the existing resource, this will ensure no additional cost will be incurred for the Standards Setting function.

4.1.3. Routes to Registration

- **Recommendation (1):** The group felt that the 3 existing routes (QCF, Related Trades (ACS) and Managed Learning programmes) into the industry are fit for purpose provided they are controlled and consistent Work experience needs to be gas specific and cover an appropriate range.
- **Recommendation (18):** Undertake a funding review to establish: i) where funding should be allocated, ii) how use of funding is monitored, iii) what is funded (QCF, MLP etc.), iv) establish a funding gap analysis.
- **Recommendation (19):** Expand the Student Loan scheme to include new entrants to the Gas Utilisation industry.

Consolidated Recommendations and Actions The current routes to registration for new entrants in relation to the assessment process are generally considered to be "fit for purpose". Changes to the provision of training as previously mentioned in this report will assist with the quality of the end applicant. However, there are a number of recommendations to how improved funding can be provided for candidates who wish to use the Managed Learning route rather than the full qualification route. This alternative is deemed more suitable for adult recruits either with or without previous experience in the gas industry. Changes to the current rules would require the Standard Setting body, in conjunction with other key stakeholders, to investigate how this may be achieved; this project would be long term and would need to provide an independent business case.

4.2. Maintaining Competence (Gas Competence Review report: Section 7)

4.2.1. Group Competence Scheme

- **Recommendation (3):** Probably more of a group competency scheme. No change to the current scheme.
- **Recommendation (4):** Does not fit in ACS as it does not necessarily demonstrate competence. It could be part of the CPD strategy. A group competency scheme could address this.

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- **Recommendation (11):** Change the training/assessment balance in favour of an increased emphasis on recent changes in matters of gas safety – by developing a regulated/GSR recognised training/assessment approach.
- **Recommendation (12):** Change the training/assessment balance in favour of an increased emphasis on recent changes in matters of gas safety – by developing a regulated/GSR recognised training/assessment approach.
- **Recommendation (14):** Change the training/assessment balance in favour of an increased emphasis on recent changes in matters of gas safety – by developing a regulated/GSR recognised training/assessment approach. Consider GCS
- **Recommendation (16):** This consideration is not an option for sole traders as it would prove extremely difficult to implement and manage. But, it could be an option as part of the Group Scheme as larger companies will have the infrastructure to manage this type of approach. However, Gas Safety competence records should still be encouraged in the industry as this would reduce the amount of training an individual would require prior to assessment.
- **Recommendation (19):** Join a Group Certification Scheme.

Consolidated Recommendations and Actions To implement this group of recommendations a generic solution is provided by the introduction of the Group Competence Scheme. Recognition of the type of work and the training i.e. briefings on changes in standards could be taken into consideration at a time when an individual has to prove their competence. This scheme requires a quality management system to ensure the gas safety competence of the engineers is adequately managed and recorded. This may prove more difficult for Sole Traders and realistically they may only have ACS as a viable Route to Re-Registration. ACS streamlining and module consolidation is therefore also seen as important and will continue via the existing Standards Setting Body model. The timescale for implementation is dependent on the rollout of the Group Scheme, but following the pilot this year the scheme should achieve a full roll out by the first quarter of 2014. Costs to implement this scheme will be incurred at the set up stage and should provide savings once the scheme is up and running, these savings will be dependent on the existing processes employers currently use to continually assess the continued gas safety competence of their engineers.

4.2.2. Job Practice Analysis

- **Recommendation (5):** There should be flexibility within the scheme to allow different learning styles which it currently does.
- **Recommendation (9):** Enough scope for flexibility exists in the current 5 year cycle – but not every provider can offer it.
- Investigate possibility of introducing a little and often option to undergo training/assessment over a 5 year period.
- **Recommendation (10):** Reduce theoretical – increase practical methods of assessment. Introduce more practical methods of assessing knowledge – e.g. meter pressure absorption could be answered by asking questions on the practical outcome such as if the pressure was?? What would you do? Re-assessment should be available for all units (RS) e.g. CMA1 CESP are cores without re-assessment.
- **Recommendation (15):** Investigate possibility of introducing a little and often option to undergo training/assessment over a 5 year period. This may allow someone to time their retirement more effectively.

Consolidated Recommendations and Actions The main theme of these recommendations is the content of the ACS assessments and in particular the balance between practical assessments and theory tests. These aspects of the assessment are being analysed as part of the Job Practice Analysis and therefore any outcomes would be part of this on-going process. With regard to the 'little and often' approach, this would be catered for in the Group Competence Scheme, as detailed in 4.2.1. The likely costs for any proposed changes would be included in the existing projects and therefore would not require a further resource.

4.2.3. No Change

- **Recommendation (1):** The recommendation is that the re-assessment time is kept to 5 years. The period is well tested and understood.
- Recommend that CPD is encouraged on an on-going basis during the 5 year period.
- **Recommendation (2):** 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.
- **Recommend (6):** ACS Centres already have a flexible approach to this.
- **Recommendation (7):** 50% of initial assessment is practical; 75-80% is practical on the re-assessment.

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- **Recommendation (8):** The processes are already in place with the Certification Bodies and are linked to the centres for assessment but not training.
- **Recommendation (13):** Not a practical proposition to implement and open to miss-use.
- **Recommendation (17):** Recognition is there, at the moment as part of the five year cycle, as a consequence it may stipulate that an engineer visits the centre within a five year cycle but will not extend the period of five years. Therefore we recommend that the inspection regime would need to be increased to accommodate a more flexible approach for re-assessment. However, to use on-site inspections in order to manage the content of the reassessment, the number of inspection would need to be increased and a work management database would need to be introduced.
- **Recommendation (18):** Introduce criteria to manage a variable reassessment regime, this may extend or reduce the period for reassessment.
- **Recommendation (20):** Not suitable for independent, impartial assessment.
- **Recommendation (21):** Industry guidance is already available through Corgi/Viper/Skills etc. However, access to information could be improved through easier access to Manufactures Instructions. This information would need to include detailed information for all aspects of gas work.

Consolidated Recommendations and Actions The majority of this group of recommendations suggest that no changes are necessary to the existing routes to registration and their associated scheme rules. However, the considerations put forward in the Competence Review Report need to be kept under consideration for review and potential changes at a later date. The general feedback indicated that existing practices were adequate and that any changes would attract significant costs and would not achieve a proportionate benefit for the Industry, or any increased protection for the consumer.

4.3. Applying Competence (Gas Competence Review report: Section 8)

4.3.1. Communication

- **Recommendation (1):** 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.
- **Recommendation (7):** Clearly communicate the purpose of RIDDORG2 to all parties, industry, engineers and consumers. Industry agreed with this statement. However, it is thought 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.
- **Recommendation (10):** 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. Industry agreed with this statement. However, not sure how this would work as it would out extra work on the HSE for feeding info from RIDDOR reports.

Consolidated Recommendations and Actions: To ensure this group of recommendations are implemented there needs to be an evaluation of the current position to how Industry views the new RIDDOR process. It is worth noting that a significant number of communications have already been made by the HSE since these considerations were raised in the Competence Review Report. However, further discussions need to take place through representation at the Strategic Management Board to establish if further communications are required, if required the existing processes set up by the Standards Setting Authority can be utilised.

4.3.2. Data analysis/communications

- **Recommendation (3):** Industry clearly identified feedback as essential for those who do report unsafe gas work. This is important that there is feedback to encourage continual feedback. However, it is not clear how this would work as it would put extra work on the HSE for feeding back info on RIDDOR reports.
- **Recommendation (4):** 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. Would be good to see some consistency from the HSE around the UK
- **Recommendation (5):** Advances in technology creating better data input methods offers opportunities for a streamlined service. Industry feels there is a need to split between RIDDOR which is being reviewed by HSE and a process where 'other' non conformities are reported. RIDDOR can be done electronically so unsure what other data input technologies would be used.
- **Recommendation (8):** Publish up-to-date and regular summary statistics of gas related RIDDORG2 reportable offences back to industry with analysis and outcomes/actions achieved. Industry agrees with this statement. However, it is not clear how this would work as it would out extra work on the HSE for feeding info from RIDDOR reports.

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- **Recommendation (9):** Reinforce the link between unsafe gas work and incidents. Industry agrees with this statement. However, it is not clear how this would work as it would out extra work on the HSE for feeding info from RIDDOR reports.

Consolidated Recommendations and Actions: The common theme of these recommendations is centred on data and how best that data can be communicated to Industry. Before the recommendations can be progressed the work changes already implemented by the HSE need to be recognised. Therefore, as a way forward the recommendations should be considered by the SMB with a view to setting up a steering group with representatives from Industry to present a suitable conclusion, a cost benefit analysis will form part of this process.

4.3.3. Legislative/scheme rule changes

- **Recommendation (2):** The understanding of the systems and principles of RIDDOR is one of learning input rather than the need for assessment. Would not recommend that any significant additional assessment of RIDDOR systems and principles are added to ACS national gas safety criteria
- **Recommendation (6):** Create a 'one-stop shop' for reporting of unsafe gas work for the gas industry would simplify the process. Industry feels that HSE is already a one stop shop, and that other issue should be dealt with by the Gas Safe Register
- **Recommendation (11):** 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. This could go a stage further by recommending that the 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/GCS Certificates of Competence to be withdrawn.
- **Recommendation (12):** Under Building Regulation heat producing appliances are required to be notified to Local Authorities via GSR. However, this would require GSR to use the data for monitoring or tracking of unsafe gas work.
- **Recommendation (13):** There was a call for the sale of gas appliances to be restricted to registered businesses/engineers. This is good in theory but has proved very difficult in implementing. However, Industry feels there is merit in looking at again.

Consolidated Recommendations and Actions: The general view regarding these recommendations is that to implement any changes would require changes to legislation and or operational standards/rules that exist for the gas utilisation industry. This is recognised as potentially difficult and unlikely to be achievable in the short term. However, further consideration of these issues may be worthwhile and should therefore remain on file for regular review via the SMB. As necessary the SMB will set up appropriate working groups to evaluate the case for change, incorporating a cost benefit analysis as part of any future report. .

5. Conclusions

The recommendations reflect the report in that there are no surprises, which is to be expected as the considerations listed in the Competence Review report have been dealt with by the working groups in a systematic approach. However, it is worth noting that the majority of the outcomes have been deemed as an issue for the Industry for some time. Therefore, the timely implementation of the recommendations will provide improvements to the gas utilisation industry in terms of gas competence. Where considerations have not been addressed, as detailed in this report, these issues will be escalated to working groups appointed by the SMB. In terms of costs, further analysis will be carried out as part of the project delivery, but with the recommendations scheduled to be implemented in the short term excessive costs are not expected, whereas recommendations that require a significant cost to industry will require further work by the allocated working groups.