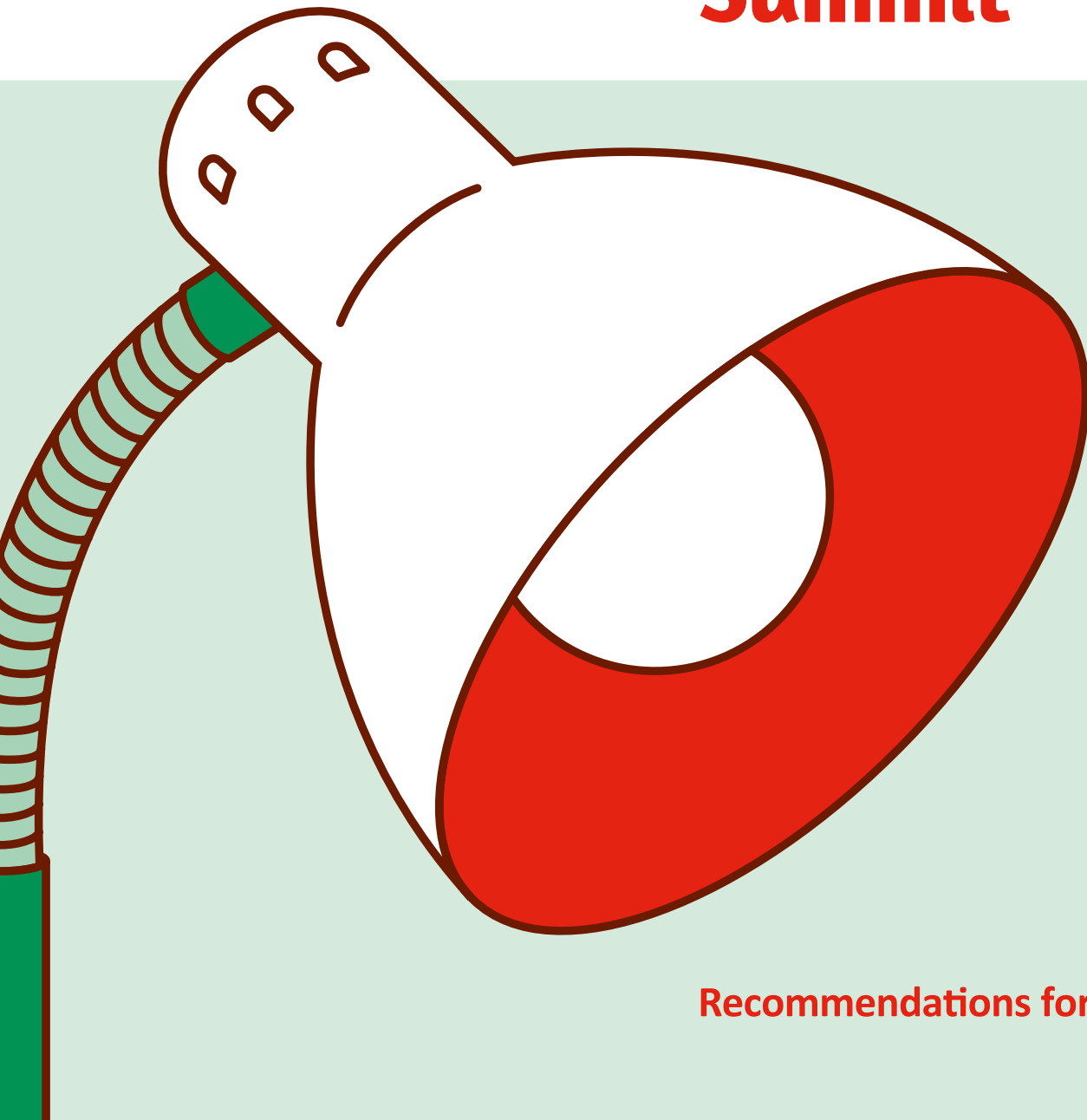


Electrical Safety First

The UK's electrical safety experts

White paper

Industry Summit



Recommendations for action

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Part P

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Introduction

On 12 March 2013, Electrical Safety First held its first electrical safety Summit.

The event's primary objective was to provide key stakeholders with an opportunity to discuss shared goals and how best to ensure consumer protection from unsafe electrical installations. The event took place in Westminster, with speakers and attendees ranging from Parliamentarians and civil servants to competent person scheme operators and contractors.

Question and answer sessions were held on three significant industry developments: Part P, the Green Deal and the Smart Meter Roll-Out. Participants at the Summit included: keynote speaker, Building Regulations Minister, the Rt. Hon. Don Foster MP; Guiliano Digilio, Chair of the UK Electrotechnical Assessment Committee; David Cowburn, Chair of the Competent Persons Forum; Jacqui Russell, Head of Smart Meter Roll-Out at the Department of Energy and Climate Change (DECC); and Electrical Safety First Director General, Phil Buckle. The event was chaired by Ann Robinson, Director of Consumer Policy at uSwitch.

In addition to an overview of the topics and issues discussed at the event, this paper offers recommendations for action, as advocated by Electrical Safety First in its role as Summit facilitator and consumer champion for electrical safety.

Section One

Part P

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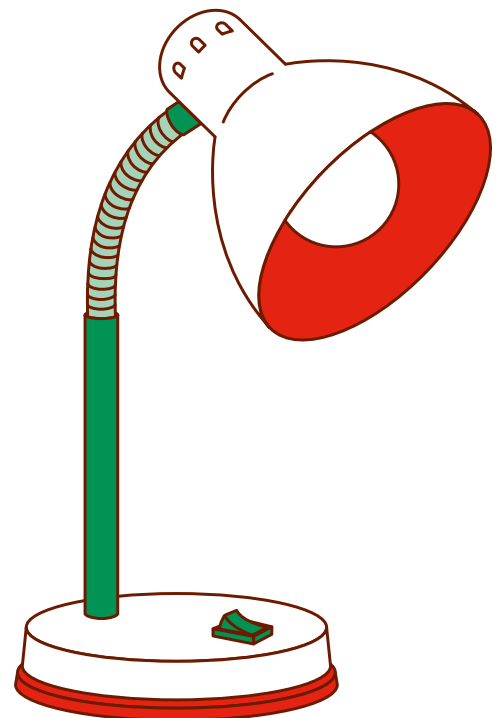
Outline

Part P is the only regulation covering the safety of domestic electrical installation work in England and Wales; as such, it is crucial to safeguarding consumers and giving them peace of mind. It requires certain electrical work to either be notified to Local Authorities or carried out by an electrician competent to self-certify their work as compliant with the Building Regulations. It is intended to ensure the safety of domestic electrical installations and curb poor workmanship by rogue tradespeople.

A) Exclusions/inclusions on notifiable work

Following a two-year Government review, Part P was amended on 6 April 2013, resulting in alterations to circuits in kitchens and outdoors being reclassified as non-notifiable work (note: the changes to Part P referenced in this document apply to England only). Ostensibly, this move was made to decrease the administrative burden on registered electricians carrying out work in the home. However, there have been warnings from Parliament and other concerned parties that the changes could lead to confusion among contractors and consumers and have a negative impact on safety.

At the Summit, the Minister stressed that the Department for Communities and Local Government (DCLG) did not anticipate householders would face a significantly greater risk as a result of the reduction to the scope of notifiable work under Part P. To support this view, he cited results from the Government consultation, which showed that a majority of respondents agreed the requirements could be reduced without unduly risking safety.



Importance of data gathering/evidence for review in 2015

Following his appearance to the Communities and Local Government (CLG) Select Committee in January 2013, Mr Foster agreed that DCLG would review the impact of the changes to Part P in 2015.

In a House of Lords debate on the issue in March, Baroness Hanham, Under-Secretary of State for Communities and Local Government, revealed that the proposed assessment criteria for the review are as follows:

- Electric shocks and fires of electrical origin.
- Membership data from the competent persons schemes.
- A review of sales of electrical test equipment.
- Awards of electrical qualifications.

Speaking at the Summit, Roberta Blackman-Woods MP, Shadow Minister for Communities and Local Government, articulated the widely-held view that a lack of information on the effects of introducing Part P had hampered arguments to retain it during the original consultation.

Despite the Government's claim to have stakeholder support for the changes, a recent poll in the industry publication Professional Electrician revealed that 38% of respondents thought Part P should be strengthened, as opposed to 19% who felt it was acceptable for it to be weakened. In light of this, and ahead of 2015, it is clearly incumbent on industry to flag any safety concerns associated with Part P changes to the Government, and other relevant parties such as the Trading Standards Institute, in order to fill any gaps in official data.

Recommendations

Part P Competent Person scheme operators should contact DCLG and flag any additional indicators they believe need to be included in a future review of the Part P requirements for England.

Part P Competent Person scheme operators and Electrical Safety First should liaise to create an incidents register, documenting evidence of any drop-off in standards – or any injuries – thought to have arisen as a result of the changes to Part P. Relevant parties should coordinate to share this data as appropriate with DCLG, the CLG Select Committee and Local Authority Building Control.

B) Third party inspection and testing

Reforms to Part P also include the planned introduction of a new scheme allowing third party inspection and certification of notifiable electrical work. DCLG's proposals for the scheme, which is still in development, raise several questions.

Costs

There were concerns regarding the government's estimated cost of £70-£150 for third party certification (as quoted in DCLG's impact assessment). Several contractors and registration bodies questioned this figure, as they believe the real cost will be far higher.

Perverse incentives

Discussions at the Summit indicate that there is some unease over whether the third party initiative will act as a perverse incentive for electricians to de-register from Part P competent person schemes.

A fundamental challenge for those designing the scheme will be to ensure that third party certifiers are not used by consumers as a substitute for engaging registered Part P installers. To prevent this, DCLG could bar the use of the new scheme by trade. This would reduce the risk of electricians dropping out of Part P and would mirror requirements for gas installations, which stipulate that any domestic work carried out for trade must be performed by accredited Gas Safe Register engineers.

Another issue yet to be addressed is the potential conflict between operators who run both Part P competent person and third party certification schemes, and how they will ensure industry and consumers understand the differences between the two.

Timescales

At the time of writing, it is expected that applications to run third party certification schemes will be invited by DCLG in summer 2013, with the schemes themselves up and running by late 2013.

Although the Government's aim of reducing costs for DIYers is commonly accepted by industry as being positive, appropriate design of the third party certification scheme is necessary to negate the potential for any negative knock-on effects.

Recommendations

DCLG and the Third Party Certification Working Group could investigate the feasibility of making Third Party Certification an exclusively not-for-trade route to certification.

C) Consumer awareness

Since the introduction of Part P in 2005, public awareness of the requirements has been low. Electrical Safety First's 2013 consumer survey revealed that just 14% of adults in England and Wales had heard of Part P and, of those, only 80% could accurately describe its main principles.

Effective messaging and promotions

During the Summit, much discussion centred on the promotion of Part P. It was noted that the new conditions of license for CPS operators includes an obligation for them to promote Part P to the general public.

It was suggested that more comprehensive evidence was needed to determine what persuaded consumers to use registered electricians – and that the information gleaned should be used to inform ongoing messages and awareness-raising about Part P.

Working with retailers

Both industry and political stakeholders acknowledge that the sector cannot work in isolation if it is to change people's views about employing competent electricians, and that retailer messaging will be crucial in making people comply with the law.

However, DIY retailers have previously been left to develop their own messages around Part P, with some doing more than others. A coherent and joined up strategy among retailers to spread similar messages when consumers purchase electrical equipment could go a long way toward improving public awareness. Following the Select Committee Inquiry on Part P, retailers were called on to establish a voluntary code on the promotion of electrical safety requirements, and Electrical Safety First has been working with the British Retail Consortium to help realise this goal.

Branding/monitoring of registers

In 2012, two new public-facing registers of electricians were set up. While these registers make it easier for consumers to find a registered electrician, it was noted by the Minister that greater collaboration between the main bodies providing accreditation for domestic installers would be desirable.

The general increase in the number of new internet search facilities for tradespeople was also discussed. In particular, how their growth means opportunities for people wishing to engage electricians are now even more diverse. Many believed that this diversity could be managed, provided consistent

messaging was given to consumers on how to engage someone competent and how to check their accreditations. It was felt that the Competent Persons Forum (CPF) could help facilitate a co-ordinated approach.

Recommendations

Industry should work with Electrical Safety First to research and identify the key drivers for householders when engaging registered electricians.

Retailer support for messages around engaging competent electricians should be proactively sought.

Common messages should be agreed by CPF members in order to help consumers more easily recognise Part P competent persons.

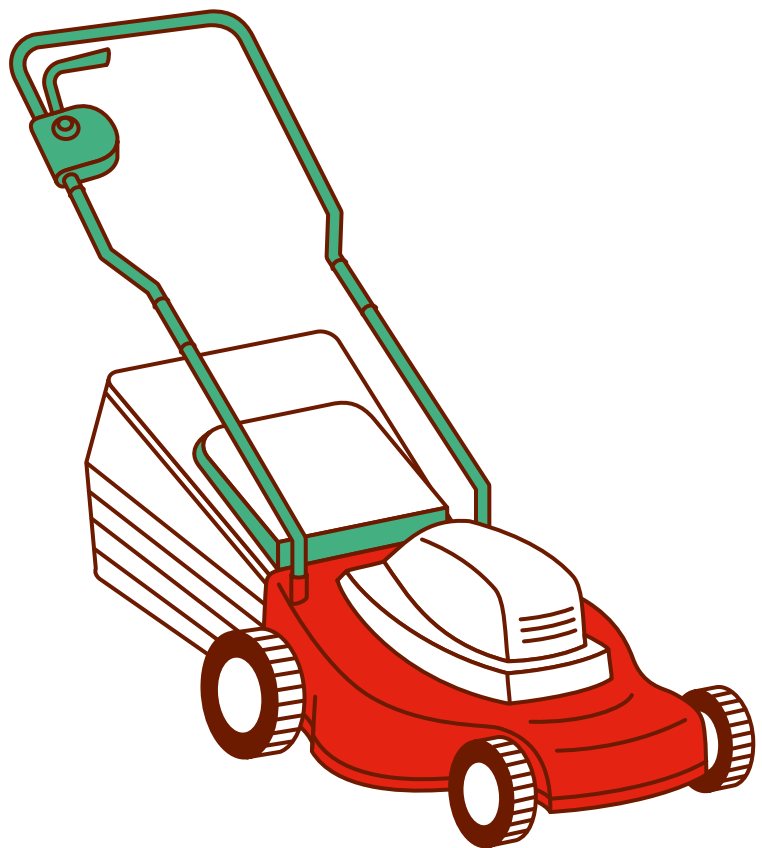
8 D) Building Regulations Challenge Panel

The Building Regulations Challenge Panel (hereon referred to as the Challenge Panel) has been set the task of simplifying and reconciling standards and regulations in order to simplify the process of building and repairing houses. They are reviewing how these requirements work together and what potential there is to free-up the system to make it work more efficiently, with a view to abolishing any unnecessarily onerous requirements. The panel is set to make its final report to Ministers in summer 2013.

The role of the Challenge Panel, and what it could mean for the English Building Regulations, was a talking point at the Summit. Although the Panel appears to have a 'free rein', the Minister stated that he did not expect it to impact on electrical safety, as Part P has already undergone a thorough review.

Recommendations

Industry and Electrical Safety First should liaise with relevant parties on the Challenge Panel in order to reiterate the importance of existing requirements relating to electrical safety.



Section Two

The Green Deal

Outline

The Green Deal (GD) is the Government's flagship carbon reduction policy. It aims to improve the energy efficiency of UK homes at no upfront cost to householders. Energy efficiency upgrades are carried out by specialist contractors and the costs passed to consumers through their energy bill. However, all upgrades must meet the 'Golden Rule' – that their cost should not exceed the value of any predicted energy savings.

Safety awareness of assessors

Discussions about the GD highlighted synergies between the initiative and the aims of home safety campaigners – i.e. the elimination of poor quality housing conditions for millions of consumers.

Previously, Electrical Safety First supported Trustmark's successful campaign to have the GD Code of Practice retain a requirement for all ancillary works to be undertaken by competent persons. This was an important intervention to guarantee the quality of secondary works but questions remain over whether GD assessors should advise households on general home safety matters, if they encounter poor housing conditions (outside of energy efficiency).

Currently, there are no explicit obligations on GD assessors to be able to identify home safety hazards, set out in the Housing Health and Safety Rating System (HHSRS), or for them to assess anything beyond what energy efficiency measures are suitable for any given property.

The Green Deal has the potential to make a significant impact – giving contractors the opportunity to improve millions of homes throughout the UK and presenting an unprecedented opportunity to engage with consumers. A major opportunity exists for home safety campaigners to set out how Green Deal Providers and Installers should usefully engage with householders on issues such as electrical safety. However, these opportunities will need to be pursued by industry if they are to be realised.

Recommendations

DECC should investigate the possibility of ensuring that Green Deal assessors are trained in the basic principles of HHSRS.

Industry should work with companies carrying out Green Deal assessments, to help establish procedures whereby poor conditions are flagged and discussed with householders.

Section Three

Smart metering

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Outline

The potential benefits of rolling out smart meters to all homes in Great Britain are substantial, with DECC estimating that net savings to the economy could be as high as £6.7bn. It is expected that most of these savings will be generated through greater consumer control and manipulation of their own energy consumption, backed up by a more competitive and nuanced set of tariffs among suppliers.

In terms of safety, smart metering provides a golden opportunity for meter operators to check the safety of energy supplies and for consumers to be made more aware of the risks posed by the equipment they have.

At the Summit, Jacqui Russell articulated DECC's view that safety had a strong, legitimate link to the smart metering project, and that, as necessary, the department would seek opportunities to raise awareness of electrical safety as part of the programme.

In order to inform the customer-facing aspects of the installation process, a Smart Meter Installation Code of Practice (SMICOP) has been drawn up. The technical elements of the installation of smart electricity meters are covered under the existing Meter Operator Code of Practice Agreement (MOCOPA).

A) SMICOP and MOCOPA

SMICOP places a responsibility on meter installers to give electrical safety guidance to consumers, such as warning against storing combustible materials too close to the metering and supply intake equipment, where appropriate. Where this is the case, meter installers should be encouraged to fit the jointly badged Electrical Safety First/CFOA fire warning label. The label was developed following a number of fatal fires in which items such as clothes and DIY materials had acted as accelerants.

MOCOPA includes a requirement for meter installers to carry out a visual inspection of the electrical intake equipment when installing smart meters, based on an inspection schedule provided by Electrical Safety First. This means that installers will effectively be obliged to fill out a safety checklist to inform the householder of any risks identified and the preventative action required.

Electrical Safety First has previously raised concerns about the likelihood of the meter tail connections in consumer units being loosened by the meter installation process, creating a fire hazard. Despite MOCOPA being amended to require installers to carry out a risk assessment and to take any necessary preventative or reactive measures, Electrical Safety First remains unconvinced that safety requirements has been fully embraced by Energy Suppliers and Meter Operators.

Unfortunately, MOCOPA does not include a requirement for meter installers to check the earthing arrangements of the electrical system they are working on. Electrical Safety First has called for this to be a requirement during any installation visit, so that the householder can be informed if they have inadequate earthing and are thus at greater risk from fire, electric shock and electrocution.

Recommendations

DECC should investigate through engagement with industry how to ensure that smart meter installers check the adequacy of earthing arrangements on their installation visits.

Skills and training

Domestic smart meter installers are likely to be required to take a level 2 Diploma in Smart Metering. If the technology is to be up and running in all homes by 2020, it is estimated that the number of smart meter installers throughout GB will need to triple by 2015. As such, a considerable effort will be needed to ensure that all smart meter installers have the necessary skills to successfully carry out the task.

At the Summit, registration of installers was flagged as a way of ensuring that they could fulfil the job requirements no matter where they are based. It was noted that the National Skills Academy for Power is currently developing a registration system for installers, which could result in a single accreditation across all Meter Operators and District Network Operators (DNOs).

Recommendations

DECC should include a requirement for smart meter installers to leave generic electrical safety information with consumers as part of their installation visit (Electrical Safety First has offered to develop this information). Training on safety should be specified in the relevant level 2 Diploma for smart metering.

B) Finding a solution to safe isolation

In last year's consultation on Smart Metering Equipment Technical Specifications, Electrical Safety First called for all meters to include safe isolation switches. Currently, electricians are required to call out the energy supplier or meter operator to cut off the energy supply – to ensure they can work safely on a de-energised system. However, this leads to unnecessary costs for contractors and, ultimately, customers. While DECC rejected Electrical Safety First's call for this to be rectified (through specification of an integral isolating switch in smart electricity meters), it did commit to working with relevant parties to establish alternative arrangements.

At the Summit, this issue arose again, with questions raised over how DECC had made a calculation as to the costs of the current system and the burden

it put onto contractors and consumers. DECC subsequently agreed to host a roundtable to find a solution agreeable to Ofgem, Network Operators and electrical contractors. One suggestion was for the installation industry to start a new scheme for those electricians competent to safely isolate electricity meters, helping them to by-pass DNOs and avoid the costs they incur in doing so.

Recommendations

DECC should broker a solution that allows competent electricians access to cutout fuses in a less costly and time-consuming way than at present.



The UK's electrical safety experts

Electrical Safety First is the UK charity dedicated to reducing deaths and injuries caused by electrical accidents. Our aim is to ensure everyone in the UK can use electricity safely.

electricalsafetyfirst.org.uk

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