

1. Overview

- 1.1. Electrical Safety First is the charity committed to reducing the number of deaths, injuries and accidents caused by electricity in the home. We welcome the opportunity to respond to the public consultation for the proposed Electricians (Scotland) Bill which proposes to provide the protection of title and registration of electricians in Scotland.
- 1.2. Currently anyone can call themselves an electrician in Scotland, without the need for any demonstrable competency or qualifications. This can lead to sub-standard electrical work and failings in workmanship, resulting in fire or personal injury. On this basis, we would welcome new regulatory measures, such as protection of title and a single register, which make identifying a registered, competent and qualified electrician easier for consumers.
- 1.3. The campaign to have the trade of electrician recognised as a profession through protection of title has helped raise awareness of the importance of electrical safety in the home and all those involved should be commended for their efforts. At the outset, we should recognise that most electricians take pride in the quality of their work and the service they offer. The task ahead is to tackle the small minority who damage trust.
- 1.4. There is limited official data to quantify the safety of domestic electrical installations in Scotland. We do know that 7% of accidental house fires – around 320 - are caused by faults with the electrical supply each year¹ but it is not possible to tell how many any of these were caused by sub-standard electrical work or failings in workmanship. Evidence from industry and research by Pye Tait² does however point to a prevalence of unqualified individuals working on electrical installations.

¹ Electrical Safety First methodology of fire data provided by Scottish Fire and Rescue Service for the period 2018-19. During this period there were 4,628 accidental dwelling fires and 326 were caused by faults electricity supply.

² <https://www.gov.scot/publications/regulation-electricians-scotland/>



Consultation Response
Proposed Electricians (Scotland) Bill
10 November 2020

- 1.5. We believe that any new regulation of electricians in Scotland must build upon the benefits and safeguards already provided through the current self-regulatory system, which recognises the different routes into the profession and includes on-going assessment of competence. This ensures consumers receive the highest levels of protection and choice.
- 1.6. We agree with the conclusion of the Scottish Government's Electricians Working Group that protection of title alone would be insufficient to achieve the level of behavioural change required, both from consumers and individual traders. It would need to be delivered alongside a package of measures and include the creation of an oversight body and effective enforcement scheme in order to tackle rogue traders, with sufficient sources of funding to ensure enforcement takes place. There would also need to be successful prosecutions to act as deterrents.
- 1.7. We support the Bill's view that a unified register is the right way forward, but do not feel the Certification of Construction Register, in its current form, is the best option for such a resource. This register is not consumer-oriented or friendly in its layout, functionality or the language used as it was never designed for regular use by the general public.
- 1.8. We have long campaigned for a new single register to provide consumers with a "one stop shop" to find qualified and competent electricians locally. This would also offer an opportunity for a centralised platform to communicate important electrical safety advice to the general public.

2. A Single Register of Electricians

- 2.1. We welcome the intention of the draft Bill to create a single, unified register of qualified, experienced and competent electricians in Scotland. Electrical Safety First always recommends that you use a registered electrician to do any electrical installation work in your home.



Consultation Response
Proposed Electricians (Scotland) Bill
10 November 2020

- 2.2. We define a registered electrician as someone who is a member of an accredited registration scheme operated by a recognised body. In Scotland, this will usually mean that they are registered with NICEIC, a member firm of the Electrical Contractors' Association of Scotland (SELECT), or a member of the National Association of Professional Inspectors and Testers (NAPIT).
- 2.3. Registered electricians work to the UK national safety standard (BS 7671) and will give you a safety certificate to confirm that their work has been designed, inspected and tested in line with that standard. They are also insured, so you are protected if anything goes wrong, which provides consumers with further peace of mind.
- 2.4. There are currently multiple avenues for consumers to find registered electricians in Scotland but there is no comprehensive database and there is low recognition for the registers that do exist. In response, Electrical Safety First created the www.findanelectricianscotland.com website which provides consumers with a straightforward way of accessing information on registered electricians.
- 2.5. As proposed in the draft Bill, we recognise the logic and practicality of utilising the Scottish Government's Building Standards Certification Register as the unified register. However, we have some reservations about its suitability as it was never designed to be a portal for consumers to find domestic electricians.
- 2.6. The draft Bill does propose making changes to its naming and certification mark but we do not believe this goes far enough. From a consumer perspective, the Certification Register is far too complicated in its current form. The language used is aimed at industry professionals rather than at people looking to engage their services. We know from our consumer research that there is a lack of understanding around the importance of using suitably qualified



electricians for work in the home, and the site does not offer any clarification around this. It also lacks a clear search facility.

- 2.7. For example, having randomly selected “Find an approved body” on the register, we were taken to an online form. Consumers are unlikely to think of an electrician or firm of electricians as a “body”, so this is not an instinctive selection. The form that is generated has nothing to explain whether an electrician falls under construction or design. Having eventually selected “Certificate of Construction (Electrical Installations to BS 7671)” through a process of trial and error, there is then no option to select a type of work and adding both a project location and postcode feels excessive.
- 2.8. In comparison, consumers can find a registered gas engineer by simply visiting the Gas Safe Register and inputting their postcode. You can also check the credentials of a gas business or engineer in the same way.³ The site also provides a range of help and advice for consumers, such as information on carbon monoxide poisoning.
- 2.9. We must recognise that consumers usually contract with electrical businesses and it is that which gives safeguards such as complaints processes and warranty mechanisms. Therefore, a database for consumers to find electrical businesses which employ competent and qualified electricians has merits.

3. Protection of Title

- 3.1. We can see the consumer benefits of enacting protection of title for electricians. Research shows that there is a lack of public awareness as to how to check an electrician's qualifications and credentials. It would also enhance the profession by making it more

³ <https://www.gassaferegister.co.uk/>



appealing and thereby attracting even more qualified and competent tradespeople into the industry.

- 3.2. Our understanding of the draft Bill's proposals is that to obtain protection of title an electrician would essentially need to be a registered electrician with an approved scheme, a position we support.
- 3.3. The Scottish Government's Electricians Working Group has already concluded that protection of title alone would be insufficient to bring about the level of behavioural change required – both from individual traders and consumers. It was agreed that an oversight body; a well-resourced enforcement scheme, with clear sources of funding to enable administration and enforcement to take place, would be needed to implement it effectively. The proposed Bill acknowledges that it would not cover all of these necessary factors and additional regulatory and public awareness actions would need to be taken forward separately.

4. Conclusion

- 4.1. We see the benefits of protection of title and a single register for consumers to identify qualified and competent electrical professionals. We believe a multi-faceted approach is required to ensure the safety of electrical installations in Scottish homes and this must be consumer-focused and offer the highest levels of consumer protection and redress.
- 4.2. Fundamentally, the effective implementation of any new regulatory measures will require the cooperation and commitment from a range of stakeholders, and crucially industry, where Scottish Government does not have direct control.
- 4.3. We also believe there should be consideration for a common electrical safety standard for housing with mandatory electrical installation checks across all tenures in Scotland. This



Consultation Response
Proposed Electricians (Scotland) Bill
10 November 2020

would help to enact an important step change in consumer behaviour, while raising awareness of identifying and using registered electricians.

