

Proposed Electricians (Scotland) Bill

Introduction

A proposal for a bill to provide for the protection of title and registration of electricians. The consultation runs from 19 August to 10 November 2020. All those wishing to respond to the consultation are strongly encouraged to enter their responses electronically through this survey. This makes collation of responses much simpler and quicker. However, the option also exists of sending in a separate response (in hard copy or by other electronic means such as e-mail), and details of how to do so are included in the member's consultation document. Questions marked with an asterisk (*) require an answer. All responses must include a name and contact details. Names will only be published if you give us permission, and contact details are never published – but we may use them to contact you if there is a query about your response. If you do not include a name and/or contact details, we may have to disregard your response. Please note that you must complete the survey in order for your response to be accepted. If you don't wish to complete the survey in a single session, you can choose "Save and Continue later" at any point. Whilst you have the option to skip particular questions, you must continue to the end of the survey and press "Submit" to have your response fully recorded. Please ensure you have read the consultation document before responding to any of the questions that follow. In particular, you should read the information contained in the document about how your response will be handled. The consultation document is available here: [Consultation Document](#) [Privacy Notice](#)

I confirm that I have read and understood the Privacy Notice attached to this consultation which explains how my personal data will be used

About you

Please choose whether you are responding as an individual or on behalf of an organisation. Note: If you choose "individual" and consent to have the response published, it will appear under your own name. If you choose "on behalf of an organisation" and consent to have the response published, it will be published under the organisation's name.

on behalf of an organisation

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

Professional with experience in a relevant subject

Please select the category which best describes your organisation

Representative organisation (trade union, professional association)

Optional: You may wish to explain briefly what the organisation does, its experience and expertise in the subject-matter of the consultation, and how the view expressed in the response was arrived at (e.g. whether it is the view of particular office-holders or has been approved by the membership as a whole).

The Scottish Joint Industry Board was founded in 1969 by SELECT and Unite the Union. The principal objects of the Board are to regulate relations between employers and employees engaged in the industry in Scotland, to provide benefits for persons engaged in the industry in Scotland, to stimulate and further the progress of the industry, and in addition and in the public interest to regulate and control employment,

Please select the category which best describes your organisation

the level of skill and proficiency, health and safety competence, wages and welfare benefits.

Membership of the Board consists of 4 representatives of SELECT and 4 representatives of Unite the Union with an independent Chairman. The main functions are the maintenance of the National Working Rules, the registration and licensing of apprentices, grading and registration of employees, the resolution of disputes and the provision of welfare benefits.

Please choose one of the following:

I am content for this response to be published and attributed to me or my organisation

Please provide your name or the name of your organisation. (Note: the name will not be published if you have asked for the response to be anonymous or "not for publication". Otherwise this is the name that will be published with your response).

The Scottish Joint Industry Board for the Electrical Contracting Industry (SJIB)

Aim and approach

Q1. Which of the following best expresses your view of the proposed Bill?

Fully supportive

Please explain the reasons for your response.

The SJIB operates a Training Programme which is a Modern Apprenticeship Framework incorporating the SVQ in Electrical Installation (SCQF 7). The programme typically takes employed learners just over four years to complete and includes on-the-job experience (80%) and off-the-job training (20%) and completion of the Final Integrated Competence Assessment (FICA). Once qualified, most SJIB Graded Electricians, after a minimum of two years' work experience as a Graded Electrician, will undertake the Advanced Competence Assessment (ACA) and apply for grading as Approved Electricians.

It therefore seems logical, not least considering public, employer and apprentice investment into the Government and industry recognised apprenticeship scheme, that the next logical step is registration and Protection of Title, both of which would recognise and mark the status and identity of being an Electrician in Scotland thereby promoting additional protection and safety of consumers, clients, property and the general public and Scottish society in general.

Q2. What do you think would be the main practical advantages of the proposed Bill?

The SJIB believes that the scale of poorly installed, defective, and unsafe electrical work is concerning - but, that this can be addressed for the future through the promotion and utilisation of registered electrical contractors (e.g. SELECT Members or NICEIC registrants), employing industry recognised and qualified electricians (to industry recognised criteria i.e. SJIB/ECS).

Protection of Title of the term Electrician would significantly enhance consumer, client and public protection and safety, whereby electricians qualified to the long established industry standards would be fully recognised, i.e. as defined under the ECS (Electrotechnical Certification Scheme) administered in Scotland by the SJIB (Scottish Joint Industry Board for the Electrical Contracting Industry) on behalf of the industry, whilst deterring unqualified or underqualified individuals and their employers from passing themselves off as such. Moving towards a regulated industry would add extra safeguards especially for the public.

Q3. What do you think would be the main practical disadvantages of the proposed Bill?

The SJIB does not see any serious practical disadvantages regarding the proposed Bill, and any perceived increased costs could be kept at a minimum. Please see our answer to question 4 for more details.

The SJIB already administers the ECS (Electrotechnical Certification Scheme) which accommodates and recognises the diverse array of electricians operating within the electrotechnical industry. With some additional safeguards added – the SJIB could develop a very robust scheme at little additional cost.

Q4. Which of the following best expresses your view of the establishment of a single register for electricians?

Fully supportive

Please give any views or comments on a single register and how it might be set up

The Consultation Documents comments on "Certification Register provided through the Scottish Government's current Certification of Construction scheme" that recognises SELECT and NICEIC as the designated Scheme Providers for the Certification of Construction scheme "which allows electricians (Approved Certifiers of Construction) working for businesses (Approved Bodies) to certify electrical work carried out where a building warrant is required."

This scheme integrates with the established SELECT and NICEIC systems for businesses and recognises SJIB Approved Electricians as being suitably qualified to take on the role of Approved Certifiers of Construction to certify electrical work.

We would suggest a similar inclusive approach could be taken in regard to registration of individual Electricians through the aegis of the SJIB (Scottish Joint Industry Board). The SJIB already provides an industry recognised, established, respected, comprehensive, cost effective and centralised Register of Electricians under its ECS (Electrotechnical Certification Scheme) and the SJIB grading process. Furthermore, close ties between the SJIB in Scotland and the JIB, which operates the ECS in England, Wales and Northern Ireland. enables compliance for those working cross-border when required.

A single register based on the existing SJIB model would provide the comfort and security that someone calling themselves an Electrician was qualified and competent to undertake electrical work.

Q5. Which of the following best expresses your view of establishing protection of title for electricians?

Fully supportive

Please give any views or comments either on the principle or practical operation of protection of title:

SJIB Electricians frequently voice their concerns and frustration that individuals, who have not met the established national and industry standards and are not qualified Electricians, are able to use the title of 'Electrician'. In what is such a highly skilled and safety critical occupation – this situation should be rectified, and the title of Electrician should be protected.

Protection of title will enhance the profession's status and reputation by restricting opportunities for the part qualified and unqualified.

The practical operation can be, as described in the answer to question 4 above, easily aligned to SJIB grading and ECS registration with minimum disruption.

Financial Implications

Q6. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

	Significant increase in cost	Some increase in cost	Broadly cost-neutral	Some reduction in cost	Significant reduction in cost	Unsure
(a) Government and the public sector			X			
(b) Businesses			X			
(c) Individuals			X			

Please explain the reasons for your response

Professional electrical installation and maintenance undertaken by appropriately qualified Electricians represents long term value for money. If the existing SJIB framework is used, any perceived additional costs should be negligible and broadly cost-neutral for Government, businesses and individuals. This approach far outweighs the medium to long term financial costs associated with poorly installed and maintained installations, including the negative consequences of electrical fires and electric shock, and the human cost and tragedy around deaths caused by fire and electrocution.

The SJIB administered ECS is an established cost-effective method of ensuring skills, qualifications and health and safety requirements are met for individuals, contractors and clients. The proposals can and should utilise and complement the existing industry skills infrastructure and certification of personnel.

Q7. Are there ways in which the Bill could achieve its aim more cost-effectively (e.g. by reducing costs or increasing savings)?

Industry recognised and qualified electricians command higher rates of pay. Any perceived additional 'costs' are offset by competent, qualified electricians, higher productivity levels and the delivery of higher quality of product. Furthermore, registration and protection of title will assist in helping to create a more "level playing field", whereby electrical contractors employing bona-fide Electricians would be less likely to be undercut by unscrupulous, part or unqualified traders, either doing sub-standard work "on the cheap", or as is seen, ripping customers off to the detriment and reputation of the regulated side of the industry. As described in question 1, the investment in electrical apprenticeships is undermined whilst unqualified or part qualified individuals are allowed to persist in calling themselves something they clearly are not.

Equalities

Q8. What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation?

Slightly positive

Please explain the reasons for your response.

The professionalisation of the trade through registration and Protection of Title should make the occupation of electrician more attractive to a diverse array of potential candidates.

The electrical industry, like many others in the construction sector has a very low level of female and BAME entrants. There are a whole host of reasons for this and the industry is working hard to encourage more female and BAME entrants into the industry. In our view, making the role of Electrician a protected title, and by implication a "profession" alongside other competing protected roles, will increase the

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candidate pool size and diversity. The numbers required to enter the industry to maintain and indeed grow the workforce, bearing in mind the drive towards an electric economy is significant, therefore increasing the number of female and BAME new entrants will be a significant benefit to the industry and country as a whole.

Q9. In what ways could any negative impact of the Bill on equality be minimised or avoided?

To mitigate negative impacts on genuine candidates, including the part-qualified, many of whom aspire to be Electricians, regardless of gender or ethnicity, the existing SJIB Crediting Electrotechnical Competence (CEC) Scheme enables independent and objective accreditation to National Occupational Standards (NOS), for those who did not undertake an industry apprenticeship or other recognised equivalent form of training, to have their skills, knowledge, training and experience assessed, accredited and recognised, enabling SJIB Grading and ECS registration. Several candidates go through the scheme on an annual basis and to alleviate any additional demand which may be placed on this scheme, we would suggest a lead in time of 18-24 months between enactment and implementation of a Bill.

Sustainability

Q10. Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

Yes

Please explain the reasons for your response.

The skills set of Electricians will play a key part in the delivery of a low carbon / carbon neutral future, not least through the installation of ever evolving environmental technologies and smart digital infrastructure. The registration and protection of title of electricians will contribute to the importance placed on the occupation, complementing the need and drive for a sustainable skills base. Furthermore, as touched upon in the answer to question 6, costs around rectification of faulty or poorly installed electrical installations and damage to property we anticipate would decrease over time, not least for clients and consumers whom insisted upon properly qualified and recognised electricians undertaking the works.

General

Q11. Do you have any other comments or suggestions on the proposal?

There is overwhelming evidence that the public think that the electrotechnical profession is regulated when it is not. People are genuinely surprised when told that no formal qualifications are needed to call yourself an electrician. Survey evidence from SELECT points to this and to a strong demand from the public that Electricians should be qualified in the interests of consumer safety. Also, the survey evidence shows that the public has little or no idea how to check that an electrician has qualifications. Most people only use an Electrician's service occasionally and it is understandable that they have no clear idea where to start. Sadly, some bogus tradesmen rely on this and present false credentials. For us, the case for action is overwhelming. Many Electricians are fully trained and operate to the highest of standards and do a good and safe job wherever they work. However, whilst most of the practising electricians do hold

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qualifications, quite a number do not and to save lives and protect the property its vital that regulation is introduced.

The main emphasis of this Bill is around the status of the individual electrician and utilisation of that occupational title. The individual operative and the company are inextricably linked - however, the Electrician and the contractor are two separate and distinct concepts and should not become conflated and confused. We are simply supporting the call for protection of the title of Electrician and the proper use of the SJIB registration scheme which already exists.

The SJIB strongly believes that the protection of the title of Electrician will both celebrate and protect the status of Electricians of which they are rightly proud, and furthermore enhance the business and standing of electrical contractors and companies, whilst making for a safer environment for consumers, clients and the general public.