



Electricity Engineers'
Association

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Mr Richard Stubbings
Registrar
Electrical Workers Registration Board
P O Box 10-156
Wellington 6143

Dear Mr Stubbings

Emailed to: info@ewrb.govt

Auditing for Compliance: Licensing Provisions – EEA submission

Introduction

The EEA thanks the Board for the opportunity of commenting on the content of its consultation paper of 7 September 2016 *Auditing for Compliance: Licensing Provisions*.

The EEA is the national representative organisation for technical, engineering, health and safety and asset management issues within the electricity supply industry (ESI). Our members include corporate and individual representatives from all sectors of the industry including generation, electricity networks, contractors (operation/maintenance), engineering consultancies and equipment suppliers.

The EEA assisted Telarc in its preparation of its offer to the Board to carry out pilot audits of the electrical industry and we have a continuing interest in the maintenance of competence by persons who are registered and licensed by the Board to carry out prescribed electrical work (PEW).

The EEA has had concerns that the past system of registering and licensing persons to carry out PEW based on a lifetime registration meant not enough attention was being paid to the registered person's continuing competence. The EEA was pleased to see the Board introduce a few years ago the requirement that registered persons, in order to gain their practising licences, must undertake periodic Competence Programmes. These we saw as helping to address the continuing competence assurance issue.

Companies in the electricity supply industry (ESI) are required by the Electricity Act and the Electricity (Safety) Regulations (ESRs) to establish and maintain safety management systems for public safety. Such SMSs are required to be audited annually by a duly accredited certification body so the ESI is familiar with both external and internal audits. Accordingly, the EEA considers that its comments may be of value to the Board.

Persons authorised by the Board to carry out PEW for the general public carry considerable responsibility for the safety of their clients and others and should be able to demonstrate their competence in ensuring that safety. Accordingly, we support any move by the Board to make the acceptance of any audits a condition of the issue or renewal of a practising licence.

We realise that the use of the term “audit” may have negative connotations and suggest that the Board might consider alternative terminology such as “safety assurance check”, which might better highlight the public safety purpose of the audit exercise.

The proposals set out in the consultation paper appear to be aimed at making the requirement for audits more acceptable to registered / licensed persons. We are of the general view that audits are aimed at ensuring the maintenance of competence by the persons authorised by the Board to carry out PEW. Competence is essential to ensure the safety of completed work and it should not be necessary for the Board to reward successful auditees. Rather each such auditee should be pleased to have been found by a neutral but knowledgeable party to be a competent electrical worker.

It may be useful to add at this stage the general comment that the EEA considers that it is not necessary for the Board to require all classes of registered and licensed electrical workers to undergo an audit. In particular, where the electrical worker is fully, or nearly always, employed on the construction, renewal or maintenance of works, it is submitted that the Board should not subject such persons to an audit since, effectively, they are subject to continual internal audits by their employers and by the owners of the assets on which they work.

We consider that the Board should concentrate its audit efforts and available funding on those persons whose prescribed electrical work impacts directly on the safety of “uninformed” users of electricity, such as those engaged on electrical installations and repairs of electrical appliances. It is recognised that some electrical workers such as line mechanics will carry out some of their work on electrical installations; however, if the bulk of their work is on works, they will be subject to effective checks by the employer or asset owner on their continuing competence.

Comments

Views are provided as requested on each of the Board’s proposals as follows

- 1. Should the Board provide a partial exemption from Competence Programme requirements on the renewal of a practising licence where the applicant has received, in the period prior to the renewal, a satisfactory electrical audit report?*

It is difficult to answer this question without knowledge of the criteria applied during the audit to ensure that the auditee is competent in electrical safety. If the audit requires the auditee to demonstrate their routine safety practices taken before and during the PEW to:

- test for satisfactory isolation before the work commences
- test at the completion of the work to ensure the satisfactory existence of earthing and earth return circuits to operate the protection provided, and
- test for correct polarity and phase rotation once the new installation or extension is lived,

then we would accept that these actions would demonstrate important fundamentals of good safe practice.

We would question the real value of such an exemption, which would in any case be very infrequent for an individual person, since part of the value of a Competence Programme is to participate in the entire session with all other attendees and absorb the updating information in standards and codes and electrical practices. While updating might be carried out on-line, there would be value in participating in the discussions that would accompany the imparting of such information. The auditee must attend a Competence Programme to carry out basic first aid and CPR refreshment anyway, and we question whether release from part of the remainder of it would be worth much in real terms.

Accordingly, we do not support the proposal.

2. *Should the Board create and allow for an audit endorsement on the practising licence of an electrical worker, on the renewal of their licence, where the applicant has received a satisfactory audit report?*

The EEA sees no need for such an endorsement on the practising licence of any electrical worker but would have no objection to anyone having satisfactorily undergone an audit using that fact for marketing purposes. As is mentioned in the consultation paper, the issue of an endorsement on the licence might encourage some licensed workers to volunteer to have an audit but we question the value of audits where the worker volunteering has ample time to ensure that the recent PEW carried out is “up to scratch”. The existence of the balloting system will better keep people on their toes since, although the odds of being audited remain relatively low, the chance does exist and must have some positive influence in ensuring a safe product.

In any case, if such an endorsement were introduced, the question would arise as to how it would be administered. When would any endorsement for a satisfactory audit expire? Would it remain in place until the next audit, which might be many years away? Can the public who may use a person's services make their own judgements as to relevance?

3. *Should the Board develop a policy to allow electrical workers associated with organisations with Board approved internal audit schemes, to be deemed to be low risk?*

Generally, the EEA would support and encourage the proposal for the establishment of an approved internal auditing scheme within any organisation involved with the performance of PEW, such as an electrical contracting company, providing the audits are frequent and carried out by competent persons such as experienced electrical inspectors. Such schemes should better assure the continuing competence of the employees and would justify those employees being placed in a low risk category.

It would be necessary for the Board to have a clear set of criteria that Board approved organisations need to meet and to carry out periodic checks to ensure that the internal auditing is sufficiently frequent to be effective. We suggest that the contractors involved be requested to submit annual reports to the Board on the frequency of the internal audits and the results of such audits. We note that the Board contemplates approving internal audit schemes and presume it will develop adequate internal audit approval criteria.

We consider it desirable that any approved internal audit scheme provides for the use of several auditors or multi-disciplined auditors with a mix of the skills, knowledge and experience to audit the range of PEW activities.

4. *Should the Board include a condition on all electrical worker licences that they undergo or participate in an electrical worker audit if and when they are selected?*

As mentioned in our introductory comments, the EEA supports the inclusion of such a condition on all electrical worker licences as it is an essential part of its ongoing responsibility to ensure, as far as is practicable, that the persons it authorises to perform PEW for the public remain currently competent and, more likely than not, provide a completed and tested product that is safe for use. This should be the over-riding consideration for the Board.

Conclusion

We should be happy to discuss any points in this submission further with the Board should that be considered desirable. In the meantime, we commend our general comments and those

on each of the four proposals to the consideration of the Board. Should you wish to further discuss or clarify any matters mentioned in this submission, please contact Peter Berry at peter@eea.co.nz or 04 4738 600.

Yours sincerely,

A handwritten signature in black ink that reads "Peter Berry". The signature is written in a cursive style with a long horizontal stroke at the end.

Peter Berry
Executive Director