



An Coimisiún
um Rialáil Fóntas
**Commission for
Regulation of Utilities**

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Commission for Regulation of Utilities

Decision Paper on the Recognition Processes for Professional Qualifications for entry to the Safe Electric and RGI Schemes

Decision Paper

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Executive Summary

The Commission for Regulation of Utilities (CRU) has the statutory function to regulate the activities of electrical contractors and gas installers with respect to safety. The CRU carries out this function through the Safe Electric and Registered Gas Installer (RGI) statutory regulatory schemes (“the schemes”).

The Safe Electric scheme for electrical contractors is operated by the Register of Electrical Contractors of Ireland (RECI) on behalf of the CRU. The RGI scheme for gas installers is operated by the Register of Gas Installers of Ireland (RGII) on behalf of the CRU.

The Criteria Documents¹, developed by the CRU following public consultation, set out how the Safe Electric and RGI schemes operate and include entry requirements. An applicant applying for registration must hold a relevant National/Advanced Craft Certificate² Level 6 on the National Framework of Qualifications (NFQ)³ or another suitable award deemed equivalent.

The European Recognition of Professional Qualifications Directive 2005/36/EC⁴ (“the Directive”), as amended by the Directive 2013/55/EU, obliges the CRU to put in place a system of recognition for the qualifications of people from all EU Member States applying for registration to the schemes. The Directive obliges the CRU to consider all relevant qualifications and apply proportionate compensation measures as appropriate. The compensation measures will be designed to bridge any gaps in training and/or knowledge between the applicant’s qualification(s) and the relevant Irish qualification. The Directive states that the compensation measures can only be in the form of an aptitude test or adaptation period (period of supervision under a scheme member).

Due to differences in course structures and content, most qualifications for electricians and gas installers such as apprenticeships awarded outside of Ireland are not comparable to Level 6 (NFQ). As such, relying on an approach based solely on NFQ Level 6 equivalence could prevent applicants holding appropriate qualifications from registering with the schemes. At present, the

¹ The Criteria Documents are subject to amendment from time to time. The [Electrical Safety Supervisory Criteria Document Version 3.0](#) was published by the CRU on 22 April 2016. The [Gas Safety Supervisory Criteria Document Version 1.6](#) was published by the CRU on 26 July 2016.

² National Craft Certificate were awarded until 2016 and Advanced Craft Certificate post-2016.

³ The [NFQ](#) is a system of ten levels used to describe the Irish qualifications system. The NFQ is based on standards of knowledge, skill and competence and incorporates awards made for all kinds of learning.

⁴ [Directive 2005/36/EC](#) of the European Parliament and of the Council.

academic recognition system in place is not sufficiently detailed to accommodate all applicants with relevant qualifications from other EU Member States and the current registration process for entry to the Safe Electric and RGI Schemes is not, therefore, fully in compliance with the Directive.

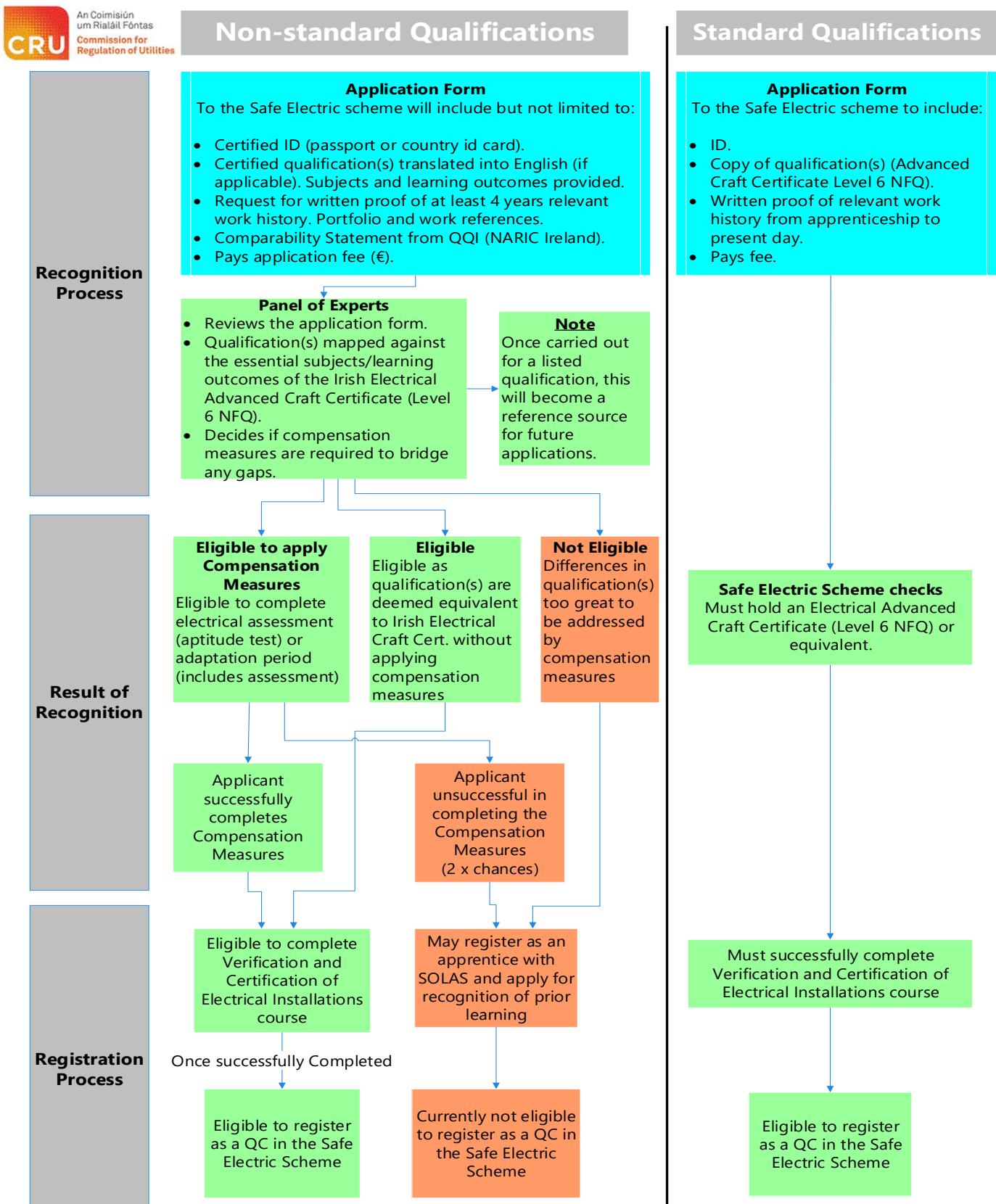
In October 2018, the CRU published a consultation paper⁵ on the proposed recognition processes for scheme applicants whose qualifications were awarded outside of the Republic of Ireland. The CRU sought views from the general public and stakeholders, in particular existing members of the schemes (RECs and RGIs), on the proposed recognition processes. The CRU has reviewed the consultation responses and considered the points raised by respondents as outlined in Section 3 of this paper. This decision paper sets out the CRU's decision on the recognition processes. The recognition processes were drafted in consultation with SOLAS, QQI, RECI, RGII and other subject matter experts.

Applicants will be required to fill out an application form with the relevant details and have their qualification(s) reviewed by a panel of experts as outlined in the flow diagrams below. The panel of experts will then decide if the gap between an applicant's qualification(s) and the relevant accepted Irish qualification(s) can be bridged by the application of compensation measures.

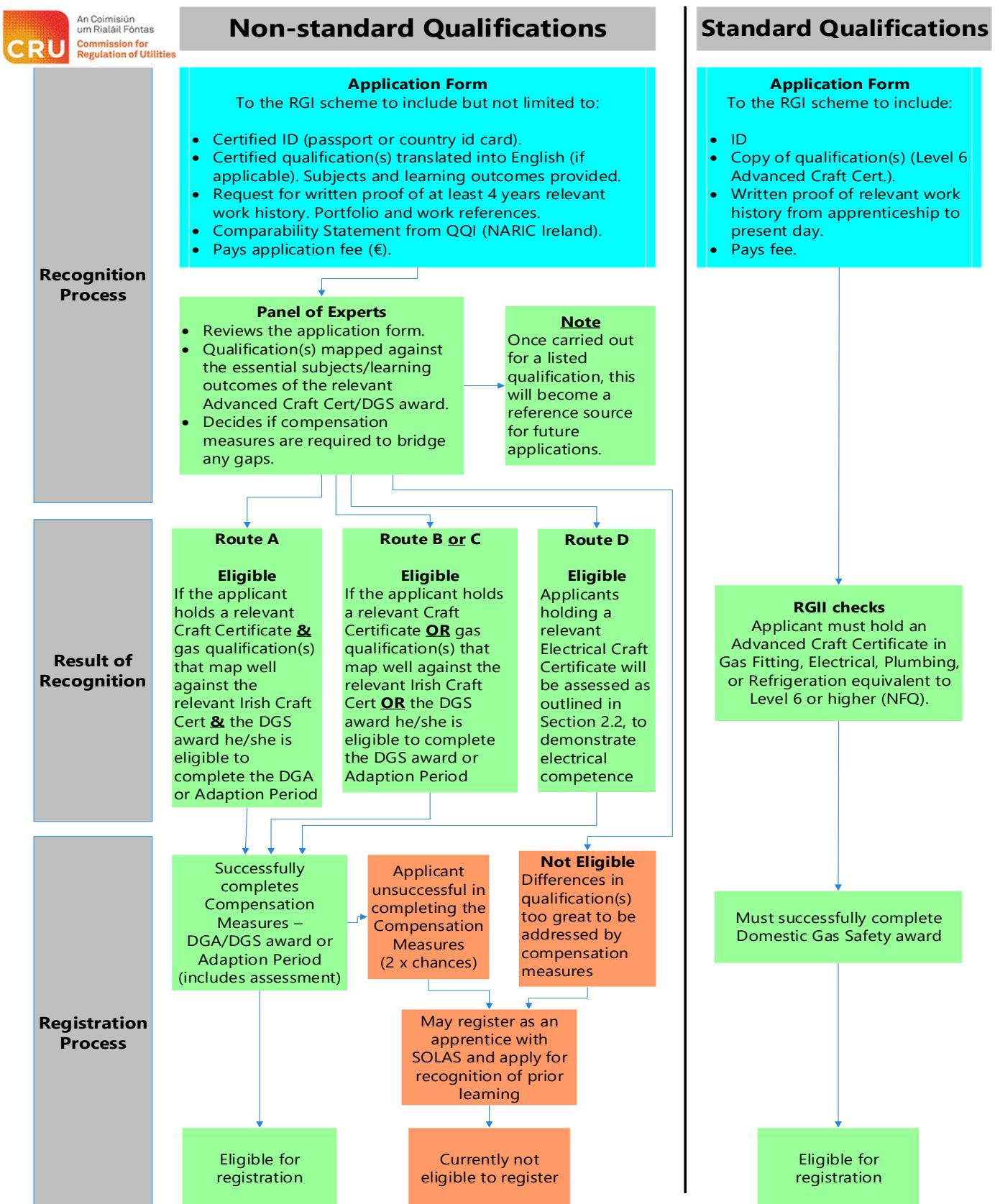
Next Steps	Timelines
Decide the essential subjects/learning outcomes of the relevant Advanced Craft Certificates/Domestic Gas Safety (DGS) qualification to be used for mapping.	October 2019
Draft application forms, recognition procedures and guidelines for applicants.	October 2019
Appoint panel of experts.	October 2019
Panel of experts finalise forms, procedures and guidelines.	October 2019
Start gas recognition process first as the assessments do not have to be developed.	November 2019
Develop electrical assessment - compensation measure (aptitude test) for the Safe Electric scheme.	November 2019
Appoint body to provide the electrical assessment.	January 2020
Start electrical recognition process.	February 2020

⁵ [CRU/18/230](#): Consultation Paper on the Proposed Recognition Process for Professional Qualifications for entry to the Safe Electric and RGI Schemes.

Safe Electric Scheme Recognition Process – Outlined further in Section 2.2



RGI Scheme Recognition Process – Outlined further in Section 2.4



Public / Customer Impact Statement

The CRU's regulatory objective for the Safe Electric and RGI schemes is to maintain the safety of customers with respect to electrical and gas installation activities. It is through the schemes that Safe Electric and RGII can monitor and validate that electrical and gas works carried out by their members are in compliance with the safety standards.

In Ireland, it is illegal for anyone other than an electrical contractor registered with the Safe Electric scheme (a Registered Electrical Contractor or REC), to carry out most electrical works in the home⁶. It is also illegal for anyone other than a gas installer registered with the RGI scheme (a Registered Gas Installer or RGI), to carry out gas works on a domestic appliance⁷.

At present, the academic recognition system in place is not sufficiently detailed to accommodate all applicants with relevant qualifications from other EU Member States and the current registration process for entry to the Safe Electric and RGI Schemes is not, therefore, fully in compliance with the Directive. As a result, applicants who may have appropriate qualifications and professional experience cannot register with the schemes.

The implementation of the system of recognition outlined in this paper will improve access to the schemes for those with relevant qualifications awarded outside of Ireland. From the perspective of members of the public availing of the services of RECs and RGIs, its implementation will provide confidence that the existing high standards of safety are maintained.

⁶ Click [here](#) to see the definition of Restricted Electrical Works.

⁷ Click [here](#) to see the definition of gas works.

Table of Contents

EXECUTIVE SUMMARY	1
PUBLIC / CUSTOMER IMPACT STATEMENT	5
TABLE OF CONTENTS	6
GLOSSARY OF TERMS AND ABBREVIATIONS	8
RELATED DOCUMENTS	9
1. INTRODUCTION	10
1.1 BACKGROUND	10
1.2 EUROPEAN RECOGNITION OF PROFESSIONAL QUALIFICATIONS DIRECTIVE	13
2. RECOGNITION PROCESSES	15
2.1 SAFE ELECTRIC SCHEME RECOGNITION PROCESS	15
2.2 SAFE ELECTRIC SCHEME	16
2.2.1 <i>Safe Electric Scheme - Entry Route</i>	17
2.2.2 <i>Safe Electric Scheme - Application Not Accepted</i>	18
2.3 RGI SCHEME RECOGNITION PROCESS	19
2.4 RGI SCHEME	20
2.4.1 <i>RGI Scheme - Entry Route A</i>	22
2.4.2 <i>RGI Scheme - Entry Route B</i>	22
2.4.3 <i>RGI Scheme - Entry Route C</i>	23
2.4.4 <i>RGI Scheme - Entry Route D</i>	23
2.4.5 <i>RGI Scheme - Application Not Accepted</i>	23
3. SUMMARY OF RESPONSES RECEIVED	25
3.1 PANEL OF EXPERTS	26
3.2 COMPENSATION MEASURES	28
3.3 MAPPING OF THE RELEVANT ADVANCED CRAFT CERTIFICATES/QUALIFICATIONS	32
3.4 INFORMATION ON THE RECOGNITION PROCESSES	34

4. FINAL DECISION	38
5. NEXT STEPS	39
APPENDIX A	40
A 1 PARTIAL ACCESS.....	40
A 2 THE TEMPORARY PROVISION OF SERVICES.....	40

Glossary of Terms and Abbreviations

Term	Definition or Meaning
CRU	Commission for Regulation of Utilities
C&G	City and Guilds
DGA	Domestic Gas Assessment
DGS award	Domestic Gas Safety award
LCR	Lisbon Recognition Convention (LCR)
NARIC Ireland	National Academic Recognition Information Centre Ireland
NFQ	National Framework of Qualifications
RECI	Register of Electrical Contractors of Ireland
RGII	Register of Gas Installers of Ireland
REC	Registered Electrical Contractor
RCI	Registered Gas Installer
RPL	Recognition of Prior Learning
QC	Qualified Certifier
QQI	Quality & Qualifications Ireland
SSB	Safety Supervisory Body
The Directive	European Recognition of Professional Qualifications Directive 2005/36/EC which was amended by the Directive 2013/55/EU
The S.I.	Statutory Instrument (S.I.) No. 8/2017 - European Union (Recognition of Professional Qualifications) Regulations 2017
The schemes	The Safe Electric and Registered Gas Installer (RCI) statutory regulatory schemes
V&C course	Verification and Certification of Electrical Installations course

Related Documents

- [CER/16/001](#): Electrical Safety Supervisory Criteria Document (Version 3.0 published on 22 April 2016).
- [CER/16/222](#): Gas Safety Supervisory Criteria Document (Version 1.6 published on 28 July 2016).
- [Directive 2005/36/EC](#) of the European Parliament and of the Council.
- [S.I. No. 8/2017](#) - European Union (Recognition of Professional Qualifications) Regulations 2017.
- [CRU/18/230](#): Consultation Paper on the Proposed Recognition Process for Professional Qualifications for entry to the Safe Electric and RGI Schemes.
- [User Guide](#): Directive 2005/36/EC.

1. Introduction

1.1 Background

The CRU regulates the activities of electrical contractors and gas installers with respect to safety⁸. The CRU carries out this function through the Safe Electric and Registered Gas Installer (RGI) statutory regulatory schemes (“the schemes”).

On behalf of the CRU, the Register of Electrical Contractors of Ireland (RECI) run the Safe Electric scheme for electrical contractors. The RGI scheme for gas installers is operated by the Register of Gas Installers of Ireland (RGII) on behalf of the CRU. Following a competitive tender process, the CRU appointed RECI and RGII to carry out these functions for a seven-year period, 2016 - 2022.

The entry requirements to the Safe Electric and RGI schemes were decided in consultation with industry stakeholders. Requirements are set at a level to ensure scheme members have the appropriate training and knowledge to safely carry out regulated electrical and gas works.

Since 2013⁹ to register as an RGI, applicants must hold an Advanced Craft Certificate Level 6 (NFQ) in gas fitting, electrical, plumbing or refrigeration, and a Domestic Gas Safety (DGS) award or equivalent. From 2008¹⁰ to register as a Qualified Certifier (QC)¹¹ with Safe Electric, applicants must hold an electrical National/Advanced Craft Certificate or another suitable electrical award equivalent to Level 6 or higher (NFQ) and a Verification and Certification of Electrical Installations award.

⁸ Pursuant to the Energy (Miscellaneous Provisions) Act in 2006.

⁹ The [Gas Safety Supervisory Criteria Document Version 1.4](#) was published by the CRU on 19 September 2013. The Gas Criteria Document is subject to amendment from time to time. [Version 1.6](#) was published on 26 July 2016.

¹⁰ The [Electrical Safety Supervisory Criteria Document Version 1.0](#) was published by the CRU on 25 April 2008. The Electrical Criteria Document is subject to amendment from time to time. [Version 3.0](#) was published on 22 April 2016.

¹¹ The requirements for Qualified Certifiers are set out in Section C part 1.2.7 of the [Electrical Criteria Document](#).

It is estimated that there are approximately 100 applicants a year to the Safe Electric and RGI schemes holding UK qualifications, and approximately 50 applicants a year holding qualifications from other Member States.

The European Recognition of Professional Qualifications Directive 2005/36/EC¹² (“the Directive”), as amended by the Directive 2013/55/EU, obliges the CRU to put in place a system of recognition for the qualifications of people from all EU Member States applying for registration to the schemes. The Directive obliges the CRU to consider all relevant qualifications and apply proportionate compensation measures to bridge any gaps in training and/or knowledge between the applicant’s qualification(s) and the relevant Irish qualification as appropriate.

The Directive requires the applicant to hold some form of attestation of competence¹³ and evidence of formal qualification(s) of a comparable professional standard.

Where an applicant’s qualification has been awarded by a third country (non-EU) and has been recognised by a Member State, if he/she has three years’ relevant work experience in a Member State, the applicant’s qualification will be regarded the same as an EU qualification.

The Directive applies to EU qualifications but does not create any obstacle to recognising professional qualifications which have been obtained outside of the EU. Once the recognition processes are in place for EU applicants, the CRU has made the policy decision to make similar provision for applicants with relevant non-EU qualifications as outlined in Section 2.

The Directive does not require a recognition process for applicants without qualifications. Applicants without qualifications will not be considered for registration with the schemes regardless of their work experience.

The CRU has been working with the further education and training body SOLAS and other industry stakeholders to obtain advice and assistance in terms of identifying the learning outcomes and content of the National/Advanced Craft Certificates, and in designing the necessary assessments to compare qualifications other than a Level 6 (NFQ) National/Advanced Craft Certificate.

¹² [Directive 2005/36/EC](#) of the European Parliament and of the Council.

¹³ Can be issued by a Competent Authority of an applicant’s home Member State.

In April 2018, the CRU held an industry consultation event for over 25 stakeholders on the proposed recognition processes outlined in Section 2 of this paper. In October 2018, the CRU published a consultation paper on the proposed recognition processes for scheme applicants whose qualifications were awarded outside of Ireland. The CRU received 13 responses (see Section 3).

The CRU is committed to ensuring that its approach to the regulation of electrical contractors and gas installers with respect to safety evolves over time and remains effective in setting an appropriate level of safety in Ireland.

1.2 European Recognition of Professional Qualifications Directive

Under the Directive the CRU is the competent authority for electrical contractors and gas installers in Ireland and is obliged to put in place a system of recognition for EU qualifications. The Directive came into operation in Ireland on 17 January 2017¹⁴.

The Directive is based on the principle of free provision of services and is designed to reduce barriers for people to work and move around the EU. Some of the main features of the Directive that relate to the schemes include the requirement for a general recognition process for professional qualifications, a process for granting partial access to the schemes, and the temporary provision of services. For clarity, this document will only address the general recognition system (see Appendix A).

Currently, all applicants to the schemes with relevant non-standard qualifications obtain a Comparability Statement from Quality & Qualifications Ireland (QQI) - NARIC Ireland¹⁵. The Comparability Statement places qualifications awarded outside of Ireland at a level on the NFQ. If QQI places an applicant's qualification below Level 6 (NFQ) he/she cannot currently register with the schemes.

As many relevant EU qualifications are not comparable to Level 6 (NFQ), this has prevented access to the schemes for people who may have appropriate qualifications and professional experience. The Directive obliges the CRU to consider all relevant qualifications and apply proportionate compensation measures to bridge any gaps in training and/or knowledge between the applicant's qualification(s) and the relevant Irish qualification as appropriate.

The Directive sets out stringent timelines for the recognition processes and the application of compensation measures.

¹⁴ [S.I. No. 8/2017](#) - European Union (Recognition of Professional Qualifications) Regulations 2017.

¹⁵ [NARIC Ireland](#) provide advice on the academic recognition of a foreign qualification by comparing it, where possible, to a major award type and level on the Irish NFQ.

- One month to acknowledge receipt of an application, and to notify the applicant of any missing documentation.
- Three months, with a possible one-month extension from receipt of complete file, to reach a decision on the application. The applicant may appeal the decision.
- A competent authority can require an applicant to take an aptitude test or to complete an adaptation period of up to three years.
- The applicant must be informed in writing, and in most cases will need to be given a choice between the two compensation measures.
- The aptitude test must be made available to the applicant within six months of the initial decision to impose the aptitude test on the applicant.

For more detail, please see the Directive 2005/36/EC User Guide, particularly section B4: 'Professions covered by the general system'¹⁶.

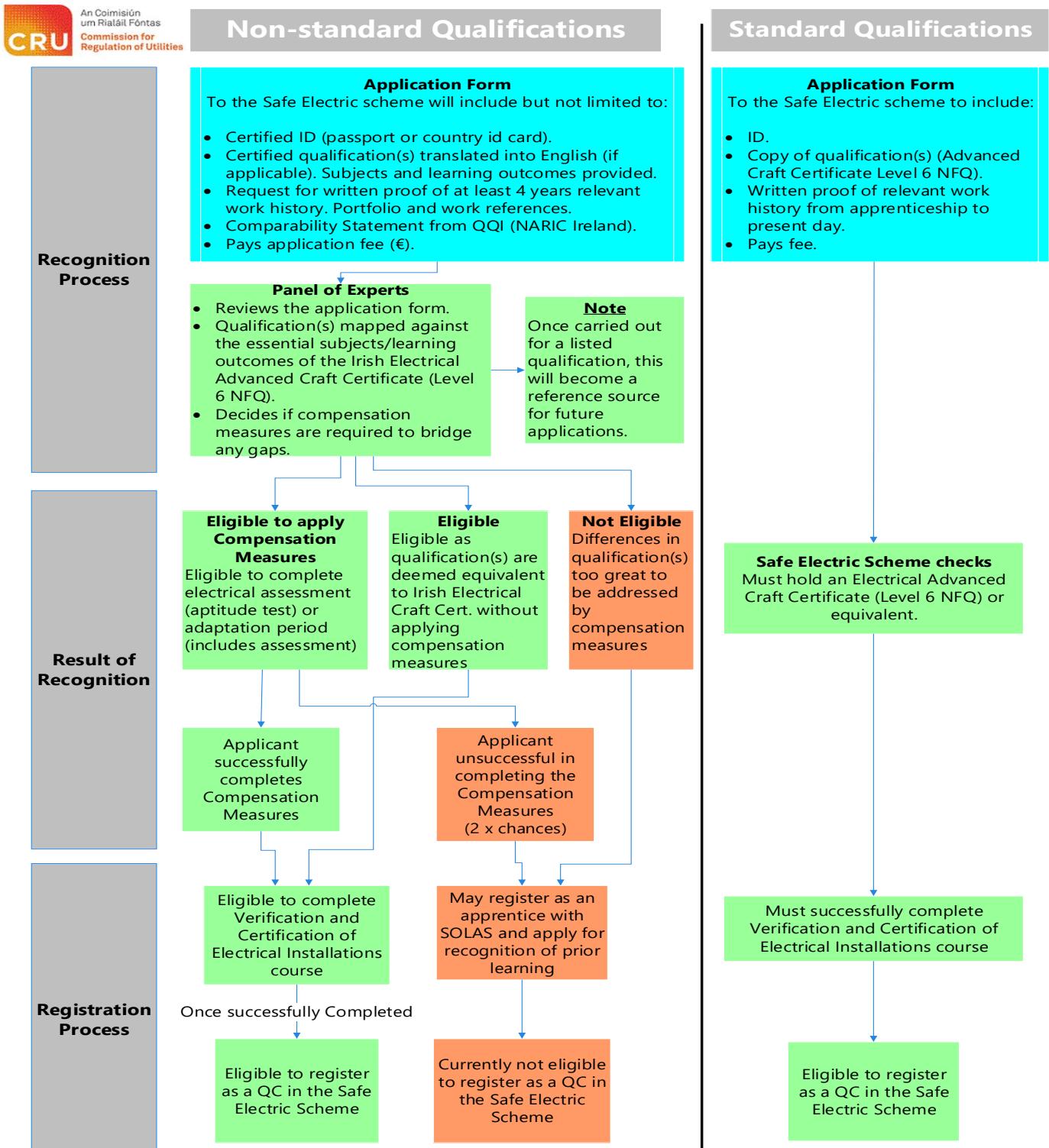
It is noted that English may not be the first language for many of the applicants. The Directive does not allow for a systematic English language competency test or interview. However, as it is essential an RGI or QC registered with the schemes be able to converse in English, any assessments will be provided in English only.

The Directive is clear that the regulatory standards are the decision of each Member State, but that it is key to have a robust recognition system to allow for free movement of professionals around the EU.

¹⁶ Directive 2005/36/EC User Guide (click [here](#)).

2. Recognition Processes

2.1 Safe Electric Scheme Recognition Process



2.2 Safe Electric Scheme

The Electrical Safety Supervisory Criteria Document¹⁷, sets out how the Safe Electric scheme operates, and includes that a Safe Electric applicant must propose a named Qualified Certifier (QC).

The QC must hold an electrical National/Advanced Craft Certificate or another suitable award, equivalent to Level 6 or higher on the NFQ, and must successfully undertake a recognised course in “Verification and Certification of Electrical Installations (V&C)”. All QCs in the scheme are required to undergo the mandatory V&C course once every five years.

The Directive obliges the CRU to consider all applications from people with relevant EU qualifications and apply compensation measures to fill any gaps in training and knowledge where necessary, namely where relevant qualifications awarded outside of Ireland are not comparable to the Level 6 (NFQ) Electrical Advanced Craft Certificate.

Applicants will be required to fill out an application form with the relevant details and have their qualification(s) reviewed by a panel of experts. The panel will consist of at least three people and be appointed by the CRU. The application form will request a portfolio of at least four years relevant work experience, which may include any relevant apprenticeship periods. The application form will also request a Comparability Statement¹⁸ and work references on the applicant's electrical work experience (translated into English as necessary). Guidelines will be provided to applicants.

Applicant's will be entitled to appeal the decision of the panel of experts to the CRU, in line with existing appeal processes. The applicant may appeal the CRU's decision to the High Court.

¹⁷ The electrical Criteria Document is subject to amendment from time to time. The [Electrical Safety Supervisory Criteria Document Version 3.0](#) was published by the CRU on 22 April 2016.

¹⁸ QQI ([NARIC Ireland](#)) provide advice on the academic recognition of a foreign qualifications through Comparability Statements. Where possible, a Comparability Statement will compare a foreign qualification with the Irish NFQ level and major award type.

It is envisaged that once the recognition process has been carried out for a listed qualification, this will become a reference source for future applicants to the scheme holding the same qualification.

It is noted that the recognition process for QC's will not change the current structure of company registration within the Safe Electric scheme. The Safe Electric scheme places responsibility with the REC (employer) for the people he/she employs, to ensure they are competent to undertake the electrical tasks required of them, and there will be no change in relation to this as a result of this process.

2.2.1 Safe Electric Scheme - Entry Route

The panel of experts will use the completed application form (includes the subjects and learning outcomes undertaken) to map the applicant's qualification(s) against the list of essential subjects/learning outcomes of the Irish electrical National/Advanced Craft Certificate. The panel of experts will decide if there are substantial differences which can be addressed by compensation measures, namely by sitting an aptitude test or completing an adaptation period.

The compensation measures will be designed to bridge any gaps in training and/or knowledge between the applicant's qualification(s) and the Irish electrical National/Advanced Craft Certificate.

When deciding on the compensation measures, the panel of experts will have due regard to the principle of proportionality (between safety and free movement of professionals in Europe), the applicant's professional experience and lifelong learning, and will use the NFQ level of the applicant's qualification(s) as a reference point for broad comparison.

The aptitude test will be in the form of an electrical assessment. It is noted that there is no existing electrical equivalent of the Domestic Gas Safety award as outlined in Section 2.4, and so an electrical assessment will be developed. The electrical assessment will cover practical aspects and knowledge of the National Rules for Electrical Installations, knowledge of which is essential in order to act as a QC within the scheme. It is likely that the electrical assessment will take approximately one to two weeks for an applicant to complete. The cost will be determined once it has been developed.

The adaptation period will comprise of a period of up to three years, where the applicant will work under the supervision of a Safe Electric Qualified Certifier (QC). This period of supervision may also be accompanied by further training and will also be subject to an electrical assessment in most cases.

Once the compensation measures have been successfully applied the applicant will be eligible to sit the mandatory V&C course (2-4 days duration, and currently costs approximately €425-750¹⁹).

Before being accepted as a QC in the scheme, each applicant will have had their qualification(s) reviewed by a panel of experts, will have successfully completed any applicable compensation measures (including an electrical assessment), and will have successfully completed the V&C course.

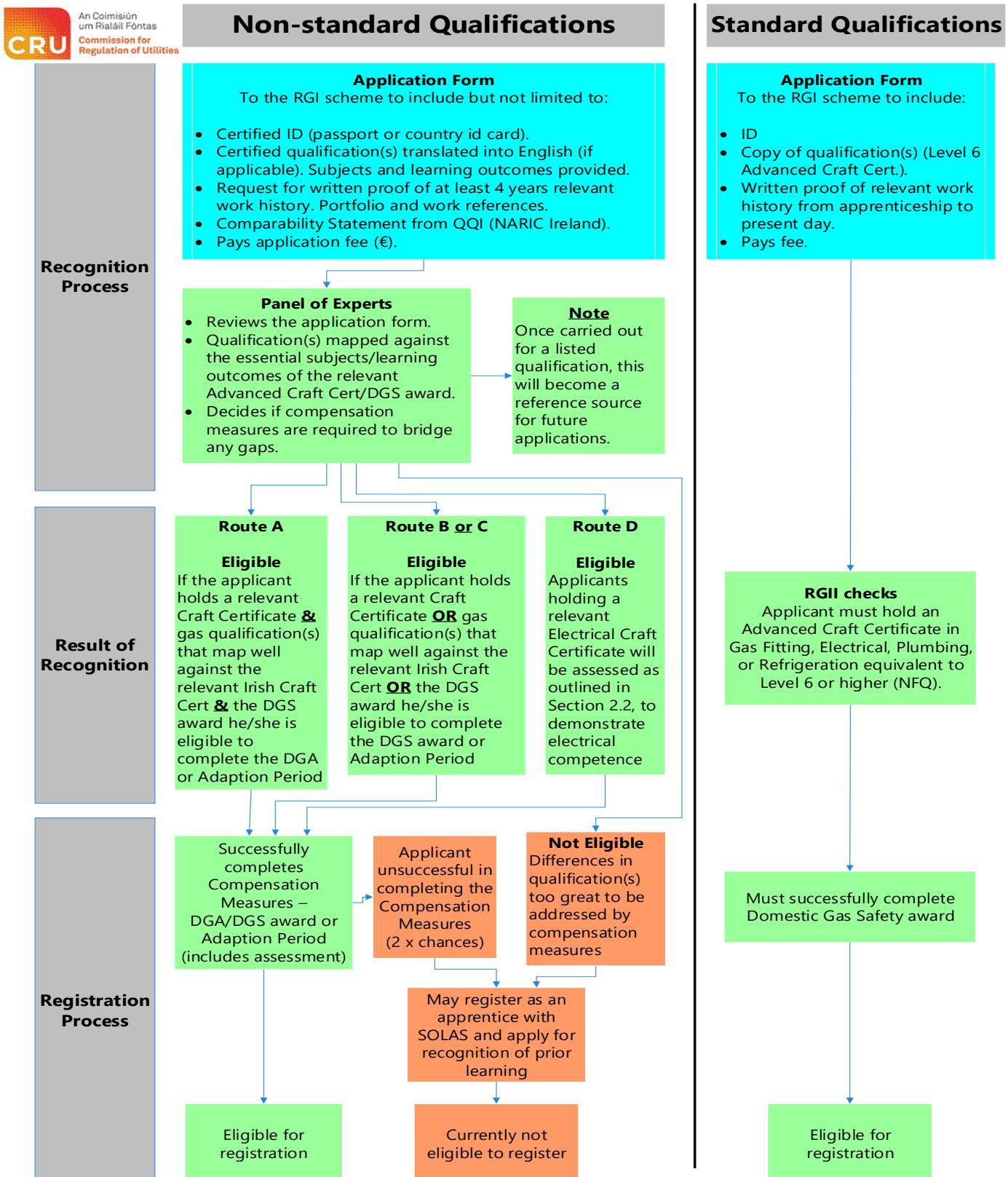
2.2.2 Safe Electric Scheme - Application Not Accepted

If the panel of experts decide that the gap between an applicant's qualification(s) and the relevant electrical National/Advanced Craft Certificate is so large that the application of compensation measures would not be sufficient to bridge the gap, the applicant if employed by an approved SOLAS employer could obtain an Irish National/Advanced Craft Certificate by completing a SOLAS apprenticeship.

If an applicant has previous experience and other relevant qualification(s), they may be able to apply to SOLAS for Recognition of Prior Learning (RPL), whereby they may seek phase exemptions from some aspects of the apprenticeship course. However, they will be required to complete the outstanding aspects of an apprenticeship to fulfil all learning outcomes required of the Level 6 (NFQ) National/Advanced Craft Certificate. Any RPL in relation to apprenticeship qualifications is outside the remit of the CRU and is the responsibility of the applicant for consideration by SOLAS.

¹⁹ Based on review of prices in June 2019.

2.3 RGI Scheme Recognition Process



2.4 RGI Scheme

The Gas Safety Supervisory Criteria Document²⁰, sets out how the RGI scheme operates. The current qualification requirements to become an RGI are as follows:

- a. An Advanced Craft Certificate in Gas Fitting, Electrical, Plumbing, or Refrigeration Level 6 (NFQ).

And

- b. A Domestic Gas Safety (DGS) award or equivalent.

The Directive obliges the CRU to consider all applications from people with relevant EU qualifications and apply proportionate compensation measures where necessary, namely where relevant qualifications awarded outside of Ireland are not comparable to the relevant Advanced Craft Certificate Level 6 (NFQ).

Applicants fill out an application form with the relevant details and have their qualification(s) reviewed by a panel of experts. The panel will consist of at least three people and be appointed by the CRU. The application form will request a portfolio of at least four years relevant work experience, which may include any relevant apprenticeship periods. The application form will also request a Comparability Statement²¹ and work references on the applicant's relevant work experience (translated into English as necessary). Guidelines will be provided to applicants.

Applicant's will be entitled to appeal the decision of the panel of experts to the CRU, in line with existing appeal processes. The applicant may appeal the CRU's decision to the High Court.

²⁰ The Gas Criteria Document is subject to amendment from time to time. The [Gas Safety Supervisory Criteria Document Version 1.6](#) was published by the CRU on 26 July 2016.

²¹ QQI ([NARIC Ireland](#)) provide advice on the academic recognition of a foreign qualifications through Comparability Statements. Where possible, a Comparability Statement will compare a foreign qualification with the Irish NFQ level and major award type.

The panel of experts will use the completed application form (includes the subjects and learning outcomes undertaken) to map the applicant's qualification(s) against the list of essential subjects/learning outcomes of the relevant Irish Advanced Craft Certificates/DGS award.

The panel of experts will then decide if there are substantial differences which can be addressed by compensation measures, namely by sitting an aptitude test or completing an adaptation period. The compensation measures will be designed to bridge any training and/or knowledge gaps between the applicant's qualification(s) and the relevant Irish Advanced Craft Certificate/DGS award.

When deciding on the compensation measures, the panel of experts will have due regard to the principle of proportionality (between safety and free movement of professionals in Europe), the applicant's professional experience and lifelong learning, and will use the NFQ level of the applicant's qualification(s) as a reference point for broad comparison.

The aptitude test will be an assessment in the form of the Domestic Gas Assessment (DGA)²² or DGS award to learn about the mandatory Irish gas standards namely I.S. 813²³, and I.S EN 1949²⁴. The DGA takes 2-4 days to complete and currently costs approximately €430-800. The DGS takes 16 days to complete and currently costs approximately €1,950²⁵.

The adaptation period will comprise of a period of up to three years, where the applicant will work under the supervision of an RGI, counter-sign certificates and be present for inspections. It is the applicant's responsibility to find an RGI whose supervision they can work under for the adaptation period. It is envisaged that after this period of supervision, the applicant will complete the DGA prior to registration in most cases.

It is envisaged that once the recognition process has been carried out for a listed qualification, that this will become a reference source for future applicants holding that same qualification to the scheme.

²² All RGIs are required to undergo a formal accredited "Domestic Gas Safety Assessments" (DGA) in an Accredited Assessment Centre once every five years or if they have been off the register for over two years.

²³ Domestic gas installations (Edition 3).

²⁴ Specification for the installation of LPG systems for habitation purposes in leisure accommodation vehicles and accommodation purposes in other vehicles (Including Irish National Annex).

²⁵ Based on review of prices in June 2019.

Below are the routes for entry to the RGI scheme for applicants with relevant non-standard qualifications. It is proposed that each application and associated qualification(s) will be reviewed by the panel of experts who will then decide the appropriate route for each applicant.

2.4.1 RGI Scheme - Entry Route A

The applicant has both a relevant craft certificate/apprenticeship qualification, and other gas qualification(s).

The Directive obliges the CRU to consider all applications from people with relevant EU qualifications awarded outside of Ireland.

If the panel of experts find that an applicant's qualification(s) map favourably against the accepted Irish qualifications' (the corresponding Advanced Craft Certificate²⁶ and the DGS award combined) list of essential subjects/learning outcomes, the aptitude test (one of the compensation measures to be offered) will be the DGA.

2.4.2 RGI Scheme - Entry Route B

The applicant has a relevant craft certificate/apprenticeship qualification.

An applicant holding a relevant craft certificate/apprenticeship qualification(s) in Gas Fitting, Plumbing, or Refrigeration will have their qualification(s) mapped against the corresponding Irish Advanced Craft Certificate's list of essential subjects/learning outcomes. The panel of experts will then decide if there are substantial differences which can be bridged by applying compensation measures, namely by completing the DGS award or an adaptation period.

Currently all gas installers in the RGI scheme are required to hold the full DGS award. On successful completion of the DGS award applicants will be eligible for registration, provided all other registration requirements are met.

Note: See Entry Route D for electrical craft certificates/apprenticeship qualifications.

²⁶ Gas Fitting, Plumbing, or Refrigeration Level 6 (NFQ).

2.4.3 RGI Scheme - Entry Route C

The applicant has a relevant gas qualification(s).

SOLAS has advised the CRU that certain elements of European craft certificates/apprenticeship qualifications may differ substantially from the Irish Advanced Craft Certificates, and it may be that an applicant's qualifications will not map favourably to the list of essential subjects/learning outcomes. Where an applicant does not meet the requirements of Entry Route B outlined above, the panel of experts will map the applicant's relevant gas qualification(s) against the gas element (the DGS award) of the Irish plumbing Advanced Craft Certificate.

If an applicant can demonstrate competence through their gas qualification(s) and professional experience, the applicant will be eligible to undertake the full DGS award. The DGS award is a requirement for all wishing to register with the RGI scheme. The DGS award focuses on gas safety in the context of achieving compliance with the mandatory Irish gas standards. Applicants availing of Entry Route C must demonstrate and provide evidence they have at least four years relevant work experience, as this is the minimum duration of the accepted Irish Advanced Craft Certificates Level 6 (NFQ).

2.4.4 RGI Scheme - Entry Route D

The applicant has a relevant electrical craft certificate/qualification(s).

Applicants holding an electrical craft certificate/relevant qualification(s) will be assessed as outlined in Section 2.2, to demonstrate electrical competence. Once an applicant has demonstrated competence in the essential subjects/learning outcomes of the Electrical Advanced Craft Certificate (Level 6 NFQ), he/she will be eligible to attend the DGS award.

On successful completion of the DGS award applicants will be eligible for registration, provided all other registration requirements are met.

2.4.5 RGI Scheme - Application Not Accepted

If the panel of experts decide that the gap between an applicant's qualification(s) and the relevant Advanced Craft Certificate/DGS award is so large that the application of compensation measures would not be sufficient to bridge the gap, the applicant if employed by an approved SOLAS

employer could obtain an Irish National/Advanced Craft Certificate by completing a SOLAS apprenticeship.

If an applicant has previous experience and other relevant qualification(s), they may be able to apply to SOLAS for Recognition of Prior Learning (RPL), whereby they may seek phase exemptions in some aspects of the course but would be required to complete the outstanding aspects of an apprenticeship to fulfil all learning outcomes required of the Level 6 (NFQ) Advanced Craft Certificate. Any RPL in relation to apprenticeship qualifications is outside the remit of the CRU and is the responsibility of the applicant for consideration by SOLAS.

3. Summary of Responses Received

This section documents the responses submitted to the CRU's consultation paper on the proposed recognition processes for scheme applicants whose qualifications were awarded outside of the Republic of Ireland. The paper was published on 18 October 2018 and the consultation closed on 16 November 2018.

The CRU received 13 responses, of which none were confidential. The main points are summarised below. These responses are published on the CRU's website alongside this paper.

The CRU wishes to thank all respondents for taking the time to submit their feedback to the consultation paper. Respondents provided important input to the consultation which informed the CRU's decision. In general, respondents were supportive of the proposed recognition processes.

A number of comments on the CRU's approach to the regulation of the schemes were out of scope for this consultation. The CRU will engage respondents who provided these general comments individually.

For clarity, the queries/comments have been grouped into the sections outlined below.

3.1 Panel of Experts

3.1.1 One respondent queried when the panel of experts will be established.

CRU Response

The panel will be appointed by the CRU in October 2019. The CRU will endeavour to have the recognition processes available as soon as possible.

3.1.2 One respondent asked how often the panel of experts will meet.

CRU Response

The panel of experts will have a limit of three months, with a possible one-month extension, to reach a decision on an application. Their meeting frequency will be determined by the volume of applications but will be at least once a quarter.

3.1.3 One respondent stated that the panel of experts should have the opportunity to verify the contents of an applicant's portfolio of work experience by means of an interview or other methodology.

CRU Response

Article 15 of the Directive clearly sets out the documentation and formalities that can be requested from applicants. It does not allow for interviews of applicants.

The application form will request a portfolio of at least four years' relevant work experience, translated as necessary. The panel of experts can also verify an application's validity by contacting the competent authority in the relevant jurisdiction.

3.1.4 One respondent stated that the panel of experts should include expertise from both educational and technical perspectives.

CRU Response

The CRU agrees that expertise from both an educational and technical perspective would be beneficial for the panel of experts.

3.1.5 One respondent asked the CRU to ensure the panel of experts are impartial and should not include training providers. Another respondent stated any involvement by Safe Electric and RGII could be a conflict of interest.

CRU Response

Potential conflicts of interest will be considered when deciding the panel of experts' composition. Its decision-making process will be independent of Safe Electric, RGII and training providers. However, Safe Electric and RGII staff members may assist with administration activities associated with the panel of experts.

SOLAS hold the statutory responsibility for the management of the National Apprenticeship system in Ireland and will be involved in the development of the recognition processes.

3.1.6 One respondent stated that the CRU does not have the authority or competency to create a panel of experts for the recognition processes in respect of the Advanced Craft Certificates.

CRU Response

The CRU has the statutory function to regulate the activities of electrical contractors and gas installers with respect to safety in Ireland. The CRU is the competent authority for the Directive and is obliged to put in place a system of recognition. The Directive states that the competent authority may obtain advice from third parties (panel of experts) in relation to the recognition processes. Therefore, the CRU is fully in compliance with the Directive by appointing a panel of experts.

3.2 Compensation Measures

3.2.1 One respondent queried the scope of the adaptation period.

CRU Response

The adaptation period will last up to three years, with applicant working under the supervision of a QC or an RGI, counter-signing certificates and being present for inspections. It is the applicant's responsibility to find a scheme member whose supervision they can work under for the adaptation period.

For the Safe Electric scheme, the adaptation period can also involve further training and, in most cases, will be subject to an electrical assessment prior to registration.

For the RGI scheme, in most cases it is envisaged that after the adaptation period, the applicant will complete the DGA prior to registration.

3.2.2 One respondent proposed that where QQI have deemed an applicant's qualification is not comparable to Level 6 (NFQ), the compensation measure should be the exact phase(s) that remain in the full apprenticeship of the relevant Advanced Craft Certificate.

CRU Response

To be compliant with the Directive applicants will be given a choice between the two compensation measures (aptitude test or adaptation period) in most cases. The Directive does not allow for the compensation measure to be a particular phase(s) of the apprenticeship.

Furthermore, if QQI deem an applicant's qualification is not comparable to Level 6 on the NFQ e.g. European plumbing craft certificate level 5 NFQ, this does not necessarily mean that SOLAS will grant Recognition of Prior Learning (RPL) for the first five phases of the plumbing apprenticeship. Any RPL in relation to apprenticeship qualifications is outside the remit of the CRU and for consideration by SOLAS.

The above proposal would require a system of academic recognition solely based on a direct comparison of NFQ level. The CRU has deemed such a system as not being adequate in

determining an applicant's suitability for entry to the scheme. Such an approach could prevent applicants holding appropriate qualifications from registering with the schemes and is not in compliance with the requirements of the Directive.

3.2.3 One respondent stated that applicants who hold a recognisable City & Guilds (C&G) qualification from the UK should be able to sit a bridging assessment to learn about the Irish standards and demonstrate competency.

CRU Response

As outlined in Section 2, the recognition processes must apply in the same way to applicants holding all relevant qualifications from Member States. Thus, the recognition processes cannot put in place special arrangements for C&G or any other qualifications.

If the panel of experts deem that an applicant's C&G qualification maps favourably against relevant Irish qualification's list of essential subjects/learning outcomes, the applicant will be eligible for compensation measures.

3.2.4 One respondent requested that the NFQ level of an applicant's relevant qualification be used as a reference point for broad comparison by the panel of experts.

CRU Response

The CRU agrees that the NFQ is an important reference point for comparing qualifications. The application form will request a QQI²⁷ Comparability Statement when deciding on the compensation measures, the panel of experts will use the NFQ level of the applicant's qualification(s) as a reference point for broad comparison.

3.2.5 One respondent stated that if there is close alignment between an RGI scheme applicant's qualification(s) and the two accepted Irish

²⁷ [NARIC Ireland](#) provide advice on the academic recognition of a foreign qualification by comparing it, where possible, to a major award type and level on the Irish NFQ.

qualifications, the applicant should undertake the Domestic Gas Assessment (DGA) instead of the Domestic Gas Safety (DGS) award.

CRU Response - Gas Only

The CRU agrees that if the panel of experts find that an applicant's qualifications map favourably against the accepted Irish qualifications list of essential subjects/learning outcomes, the aptitude test (one of the compensation measures to be offered) can be the DGA.

3.2.6 One respondent stated that they would support an approach where applicants to the RGI scheme would undergo an initial assessment, and if they successfully passed the assessment could undertake the DGA (as the aptitude test) instead of the DGS award.

CRU Response - Gas Only

As an alternative, the CRU considered the approach where applicants would undergo an initial assessment, and on passing would be eligible to undergo the DGA and subsequently apply for registration. However, an initial assessment would take time to develop, consult on and tender.

As outlined in Section 2.4, the DGA and DGS will be used as aptitude tests, the ready availability of which will enable the recognition process to be developed quickly.

As outlined in Section 2.4.1, for an applicant to be eligible to sit the DGA as the aptitude test, he/she must have a relevant craft certificate/apprenticeship qualification and other gas qualification(s) that map favourably against the accepted Irish qualifications.

3.2.7 One respondent suggested that training providers could offer optional prepping courses to ensure an applicant's readiness for sitting the DGS award.

CRU Response - Gas Only

There will be no requirement for prepping courses for the DGS or DGA aptitude tests. However, applicants can liaise with training providers for course guidance prior to sitting the assessments.

3.2.8 One respondent stated that applicants to the RGI scheme with electrical craft certificates/apprenticeship qualifications should have to undergo an additional accredited piping course.

CRU Response - Gas Only

The Electrical Advanced Craft Certificates Level 6 (NFQ) is accepted for entry to the RGI scheme with no requirement to undertake a piping course prior to registration. As with all applicants, they are, however, required to pass the DGS award.

3.3 Mapping of the relevant Advanced Craft Certificates/qualifications

3.3.1 One respondent stated that the criteria for decision making and appropriate methodology to facilitate mapping/comparative analysis of the Advanced Craft Certificates needs to be robust.

CRU Response

The panel of experts will require clear procedures to facilitate the mapping of an applicant's qualifications. The CRU acknowledges that is a complex task and will seek the guidance from appropriate experts where necessary including reviewing the procedures of equivalent competent authorities.

3.3.2 One respondent queried how the mapping process will be applied in practice. Another respondent stated that it is not clear what the panel of experts will consider acceptable.

CRU Response

The application form will request an appropriate level of information regarding the applicant's relevant qualification(s) including the subjects, learning outcomes, professional experience, and NFQ level.

For each of the schemes accepted qualifications/Advanced Craft Certificates, the panel of experts will have a corresponding list of essential subjects/learning outcomes. Knowledge of these essential subjects/learning outcomes will be considered mandatory to practice as an RGI or QC in the schemes. The essential subjects/learning outcomes of each qualification will be drawn up in consultation with SOLAS, RECI, RGII and other subject matter experts.

The panel of experts will map an applicant's qualification(s) to help decide if there are differences which can be addressed by compensation measures.

In doing so, the panel of experts shall:

- A. Have due regard to the principle of proportionality (between safety and free movement of professionals in Europe),
- B. Have due regard to the applicant's professional experience and lifelong learning, and
- C. Use the NFQ level of the applicant's qualification as a reference point for broad comparison.

3.3.3 One respondent queried whether the mapping process has already been completed between the Irish qualifications and UK equivalents.

CRU Response

The mapping process has not been completed between any qualifications. The panel of experts will complete the process when appointed.

3.3.4 One respondent stated that the Directive obliges the CRU to put in place a system of access for the schemes but does not empower the CRU (or any other party charged by the CRU) to compare, recognise, or take action in respect to the Advanced Craft Certificate.

CRU Response

The CRU is the competent authority for the Directive and is obliged to put in place a system of recognition. The entry requirements for both schemes include that applicants must hold a relevant National/Advanced Craft Certificate Level 6 (NFQ). To ensure the existing high standards of safety are maintained within the schemes, applicants will need to demonstrate competence through their qualification(s). To assess this, the panel of experts will compare an applicant's qualification(s) with the relevant Irish Advanced Craft Certificate.

For clarity, the purpose of the recognition processes is not to determine if an applicant's qualification is equivalent to the Advanced Craft Certificate. The recognition processes are designed to allow people with relevant qualifications awarded outside of Ireland demonstrate an appropriate level of competence and become registered with the schemes.

3.4 Information on the Recognition Processes

3.4.1 One respondent requested that the CRU establish an appeals process.

CRU Response

Applicants will be entitled to request a review by the CRU of the panel of experts' decision, in line with existing processes. The applicant may then appeal the CRU's decision to the High Court.

3.4.2 One respondent stated that feedback from applicants and facilitators would provide a valuable insight into the effectiveness of the recognition processes. The respondent also stated that profiling the various types of applicants would be useful to establish exemplars of the processes.

CRU Response

Feedback from applicants and facilitators will provide valuable insight into the effectiveness of the recognition processes. The CRU is committed to ensuring its approach evolves over time and will engage with stakeholders to ensure the recognition processes remains effective.

It is envisaged that once the recognition process has been carried out for a listed qualification, that this will become a reference source for future applicants to the scheme, holding EU and non-EU qualifications.

3.4.3 One respondent recommended that the CRU review existing Recognition of Prior Learning (RPL) methodologies in the educational sector to draw on best practice from the key principles of the Lisbon Recognition Convention (LRC).

CRU Response

The CRU agrees that reviewing existing RPL methodologies in the educational sector will be useful for the recognition processes.

While the LRC's methodologies and principles are modelled towards academic recognition, elements of the systems and procedures can be used to ensure the suitability of the CRU's recognition processes.

3.4.4 One respondent stated that clear communication materials should be made available for applicants.

CRU Response

Clear guidelines will be made available to applicants and the CRU will endeavour to demonstrate the different steps and stakeholder roles in the recognition processes. The CRU will also produce a glossary of terms to be incorporated in all relevant materials related to the recognition processes.

3.4.5 Two respondents stated that the recognition processes should be robust enough to ensure the required safety and compliance levels are met.

CRU Response

The recognition processes outlined in Section 2.0 propose a mechanism for people with relevant non-Irish qualifications to become registered while maintaining the competency of RGIs and QCs in the schemes.

Compensation measures will be applied to fill gaps in an applicant's training/knowledge. Applicants who become registered must adhere to the schemes' rules of registration including on inspection and audit, ongoing training, completion certificates, and insurance. This will ensure consumers can be confident that the existing high standards of safety are maintained within the schemes.

3.4.6 One respondent requested that the recognition processes be applied for non-EU countries (specifically the UK following Brexit). Another respondent queried if the impact of Brexit has been considered in the context of how the Directive will apply to UK citizens.

CRU Response

The Directive applies to EU qualifications but does not create any obstacle to recognising professional qualifications which have been acquired from outside of the EU. Once the recognition processes are in place for EU applicants, the CRU has made the policy decision to make similar provision for applicants with relevant non-EU qualifications as outlined in Section 2

3.4.7 One respondent suggested that the application form should request a portfolio of work experience for the previous 4-6 years instead of the 10-year period as in the consultation. Another respondent stated that the request for the work experience over the previous 10 years was excessive. Another respondent suggested that the application form should request an endorsement from an employer whom the applicant has carried out relevant works for.

CRU Response

The application form will request a portfolio of at least four years relevant work experience in past 10 years. Four years is aligned with the minimum duration of the accepted Irish Advanced Craft Certificates Level 6 (NFQ). The application form will also request translated references on the applicant's relevant work experience.

3.4.8 One respondent asked the CRU to reconsider the strict scheme entry requirement of a Level 6 (NFQ) Advanced Craft Certificate and accept different relevant qualifications from across the EU.

CRU Response

The recognition processes will take in to account the subjects/learning outcomes/NFQ level of the applicant's qualification(s), alongside professional experience and lifelong learning. The NFQ level of the applicant's qualification(s) will be used as a reference point for broad comparison.

3.4.9 Two respondents stated that the recognition processes may enable people who have failed their apprenticeships in Ireland seek lesser qualifications in different jurisdictions to gain registration in the schemes.

CRU Response

The Directive is based on the principle of free provision of services and is designed to reduce barriers for people to work and move around the EU. The CRU must consider all relevant qualifications. The recognition processes aim to ensure applicants are competent to carry out the role of an RGI/QC with due regard for safety and the need for a system that allows free movement of professionals around the EU.

3.4.10 One respondent stated that any proposal in relation to the Directive should not negatively impact or undermine the current apprenticeship system. The respondent also stated that they struggle to see how proposed recognition system will deliver equivalent to the Advanced Craft Certificate.

CRU Response

The recognition processes assess whether the knowledge and professional skills of the applicant are sufficient to pursue the profession of a QC or RGI in Ireland. Irish applicants to the schemes will still be required to obtain an Irish Advanced Craft Certificate.

For clarity, the purpose of the recognition processes is not to determine if an applicant's qualification is equivalent to the Advanced Craft Certificate. The recognition processes are designed to allow people with relevant qualifications awarded outside of Ireland demonstrate an appropriate level of competence and become registered with the schemes.

3.4.11 Two respondents requested that the recognition process be applied for all relevant qualifications serving the domestic gas sector. Another respondent queried what qualifications will be considered in the gas recognition process.

CRU Response - Gas Only

The Directive obliges the CRU to consider all applications from people with relevant EU qualifications awarded outside of Ireland.

4. Final Decision

The CRU is committed to ensuring that its approach to the regulation of electrical contractors and gas installers with respect to safety evolves over time and remains effective in setting an appropriate level of safety in Ireland.

This paper has outlined the background to the European Recognition of Professional Qualifications Directive, and the CRU's intention to introduce recognition processes for scheme applicants whose relevant qualifications were awarded outside of Ireland.

The CRU has decided to apply the recognition processes as outlined in Section 2 to create a mechanism for people with relevant non-standard qualifications to become registered while maintaining the competency of RGIs and QCs in the schemes.

Compensation measures will be applied to fill any gaps in an applicant's training/knowledge. Applicants who become registered must adhere to the scheme's rules of registration such as inspection and audit, ongoing training, test equipment, insurance and completion certificates. This will ensure consumers availing of the services of RECs and RGIs can be confident that the existing high standards of safety are maintained within the Safe Electric and RGI schemes.

5. Next Steps

The CRU will continue to liaise with the relevant stakeholders regarding the implementation of the recognition processes.

Next Steps	Timelines
Decide the essential subjects/learning outcomes of the relevant Advanced Craft Certificates/Domestic Gas Safety (DGS) qualification to be used for mapping.	October 2019
Draft application forms, recognition procedures and guidelines for applicants.	October 2019
Appoint panel of experts.	October 2019
Panel of experts finalise forms, procedures and guidelines.	October 2019
Start gas recognition process first as the assessments do not have to be developed.	November 2019
Develop electrical assessment - compensation measure (aptitude test) for the Safe Electric scheme.	November 2019
Appoint body to provide the electrical assessment.	January 2020
Start electrical recognition process.	February 2020

Appendix A

This document only addresses the general recognition system for electrical contractors and gas installers with relevant qualifications from outside of Ireland. For clarity, the terms below have been explained, and will be consulted on in the future.

A 1 Partial Access

The Directive states the CRU shall grant partial access on a case-by-case basis, when all the following conditions are fulfilled:

- (a) The gas installer/electrical contractor is fully qualified to exercise as the equivalent of an RGI or QC (in the Safe Electric scheme) in their home Member State
- (b) Differences between the gas/electrical activities exercised in an applicant's home Member State, and the RGI/Safe Electric Scheme as such are so large that the application of compensation measures would amount to requiring the applicant to complete the full apprenticeship programme in Ireland to have full access to the schemes
- (c) The gas/electrical activity required of the applicant can objectively be separated from other activities falling under the RGI/Safe Electric Scheme. The CRU shall take into account whether the proposed activity can be pursued autonomously.

A 2 The Temporary Provision of Services

The Directive states the CRU shall grant temporary provision of services. The temporary and occasional nature of the provision of services shall be assessed on a case by case basis, particularly in relation to its duration, its frequency, its regularity, and its continuity. The Directive states that applicants applying for the temporary provision of services would be subject to the same rules of registration and statutory requirements as RGIs and RECs in Ireland.