

WATER REGULATIONS ADVISORY COMMITTEE

PLUMBING WORKING GROUP

Development of Common Minimum Entrance Requirements for Approved Contractor Schemes.

Overview

1. At the PWG meeting on the 9th July, members decided that a common, minimum set of entrance requirements should be agreed for Approved Contractor schemes. This paper sets out the key issues that need to be considered in order to meet this aim. A summary of the main issues and decisions needed is at Annex A, which can be used as a working document for the Group. It also covers some of the secondary issues that could be taken forward to enhance the profile and operation of Approved Contractor schemes.
2. It will be important to consider the extent to which the minimum requirements should be devoted solely to the Water Fittings Regulations. To increase the credibility of schemes to plumbers and customers, schemes should include some level of consumer benefits and protection, although it is recognised that schemes are primarily to promote compliance with the Regulations. Consideration should especially be given to other schemes involving plumbers, notably the Quality Mark and Self-certification under the Building Regulations, and the desirability of establishing 'deemed to satisfy' arrangements to provide easy access for members to these other schemes. Members' views are invited on the following proposals as a platform for discussion.

Proposed Common Minimum Requirements

Water Regulations Test

3. It is proposed that a common baseline qualification in the Water Regulations should be agreed. All tests that were then deemed to meet or exceed this standard would then be accepted equally across the industry. The BPEC/WRAS and City & Guilds tests are effectively the benchmark in the schemes approved by the Secretary of State and WIAPS, but some water companies operate different tests. Members are invited to consider the findings of Terry Stephenson's subgroup, (Annex B) which examined the similarities across all the recognised Regulations tests.
4. Two schemes (APHC and SNIPEF) approved by the Secretary of State require that 1 in 5 plumbers in an approved plumbing firm should hold a certificate in the Water Fittings Regulations, with the certificate holder being responsible for checking and signing off the work of other plumbers in the company. The other scheme (IoP), for individual plumbers, requires each plumber to hold a Regulations qualification. Members should therefore consider how these arrangements fits with a common approach.

Plumbing Qualification

5. In addition to a Regulations qualification, it is proposed that a minimum plumbing qualification should also be established for acceptance onto any Approved Contractor scheme. Recognised plumbing qualifications tend to be based on the (S)NVQ and C&G boards and it is suggested that the group should draw up a list of the qualifications that would be deemed acceptable. Members should also consider the minimum level of qualification that would be required. At present, for example, many schemes specify that

the level should not be below NVQ level 2 or equivalent and the group should reach an agreement as to whether this, or a different level, should be standardised (see para. 18).

Auditing of plumbing work

6. Most schemes at present carry out some level of auditing of members' work, but this is variable. The current arrangements include inspections on application and/or at a set (annual) rate thereafter. Supplementary audits are also carried out in response to complaints. Members need to agree an appropriate minimum level of audit requirement. It might be that an appropriate balance could be struck between auditing and other scheme requirements.

Insurance

7. All schemes presently offer some level of insurance. The most common level of public liability insurance seems to be £2m, which would suggest setting this as the minimum acceptable for Approved Contractor schemes. Also, where relevant, Approved Contractors should offer employer's liability insurance in compliance with the statutory requirements.

Complaints procedure

8. The 3 schemes approved by the Secretary of State all include a complaints procedure, which was considered essential for the credibility of schemes. Members should consider whether, if not the case already, this should be included in each scheme. As well as providing an additional customer benefit, this would provide a mechanism for keeping an additional check on plumbers' work.

Ongoing training and development

9. Other benefits for plumbers joining schemes include receiving up-to-date publications and information, access to further training, and recommendations to enquirers. A basic package of plumber benefits, including ongoing training and development, could be agreed as part of the minimum requirement (see para. 13). This already forms part of all schemes and there could be advantages in formalising those arrangements.

ID card

10. It is understood that this is already a requirement of all schemes.

Potential exceptions to the Common Minimum Requirements

Portfolio of Work

11. Some schemes have indicated that they would accept a portfolio of work instead of a formal plumbing qualification, with various requisites for minimum periods of employment and a demonstration of an acceptable range of work. The Group should consider whether and in which circumstances submitting a portfolio of work would be an appropriate exemption from a plumbing qualification. It is suggested that might link well with audits carried out on application, which would provide further assurance for schemes in considering the acceptability of work portfolios instead of qualifications.

Existing scheme members

12. Members need to consider how to deal with plumbers on existing schemes who might not previously have met a new agreed minimum standard. Two options are presented below:
 - a) All current members of Approved Contractor schemes not meeting the agreed common minimum requirements would be required to meet them (within a certain timescale) or will no longer be eligible to be on the scheme;

- b) All current members of Approved Contractor schemes allowed to remain, but in the future the common minimum standard would be required. This approach would be supported by the auditing those members would have already undergone.

Proposed Common Minimum Benefits

13. All schemes offer a package of benefits to their Approved Contractors, which are summarised below. The Group should consider whether any of these could be common to all schemes and which should remain as additional benefits, included at the discretion of individual schemes. Members might also want to consider how they can work together more effectively to provide improved benefits to plumbers.

Fast tracking of new connections

14. Many water company schemes, including WIAPS, already offer fast tracking and/or reduced charges on connection fees for new developments. It would be worth considering whether these arrangements could be made more widely available to all Approved Contractors, regardless of the scheme under which they operated. The group is asked to consider whether this option is workable in practice.

Addition to a National Approved Contractor Database

15. WRAS is currently compiling a list of Approved Plumbers that would be operated from its website. It is proposed that all plumbers qualified as an Approved Contractor would automatically be included in this database.

Branding & Marketing

16. There is the potential to create an Approved Contractor label/logo to give schemes national recognition and coherence. It would be possible for Approved Contractors to use this in association with other company or organisation brands. A national brand label would also make Approved Contractor schemes easier to jointly promote, enhancing consumer awareness of the Water Fittings Regulations and directing customers to the plumbers that are known to comply with them.

Access to other industry schemes

17. Several 'quality' schemes operate in the construction industry involving plumbers. It would be beneficial to provide easy access onto these schemes for Approved Contractors, as well as to allow members of other schemes to join Approved Contractor schemes with equal ease.
18. The summary requirements for the Quality Mark (QM) scheme are in Annex C. This has some minimum entrance criteria above those outlined above for Approved Contractors, such as NVO level 3 (rather than 2) in a plumbing qualification and a 1:2 ratio in qualified members (rather than 1:5). Serious thought should be given to whether and how the minimum common requirements for Approved Contractor schemes should be developed to provide a good fit with these requirements.
19. With a common minimum requirement for Approved Contractor schemes, there should be considerable scope to establish deemed to satisfy arrangements with QM. This might also facilitate reduced entrance fees to QM. It should be noted that the QM does not include a requirement for training in the Water Fittings Regulations. The QM 'branding' could be used in conjunction with Approved Contractor schemes' (or any other) brands.

Future Developments

20. It has been suggested that there should be one 'approval body' to oversee the development of schemes, comprising a representative from all present schemes, WRAS and the Department. This would ensure that all proposed and existing Schemes adhered to the minimum requirements and would provide a forum to share good practice and promote joined-up working.

21. Additionally, this body could oversee the development of schemes, such as into sector subgroups. It is recognised that subgroups for particular sectors of the industry are an important consideration, but at present this Working Group should focus on establishing a common minimum standard for schemes. An approval body could ensure that any subgroups had uniformity across the industry, maintaining minimum standards to enable their national acceptance.

WRAC Secretariat
August 2002

Annex A

Common minimum requirements for Approved Contractor schemes: Summary of key issues

Requirement	Decisions Needed	Issues to resolve	Issues Agreed
Water Regulations Test	<ol style="list-style-type: none"> 1. Common Baseline 2. Ratio of qualified plumbers in plumbing companies 	<ol style="list-style-type: none"> 1. Exceptions for some existing Approved Contractors? 	
Plumbing Qualification	<ol style="list-style-type: none"> 1. Suitable level 	<ol style="list-style-type: none"> 1. Aim for parity with QM? 2. Portfolio of work approach 	
Auditing	<ol style="list-style-type: none"> 1. On application 2. Annual rate 3. In response to complaints 	<ol style="list-style-type: none"> 1. Balance with other scheme requirements? 	
Insurance	<ol style="list-style-type: none"> 1. Level of Public Liability - £2m? 		
Complaints	<ol style="list-style-type: none"> 1. Establishing procedure for customers 2. Action to be taken 	<ol style="list-style-type: none"> 1. Requirement of an additional audit? 2. Align with QM requirement? 	
Ongoing training and development	<ol style="list-style-type: none"> 1. Receiving publications 2. Recommendation to enquirers 3. Training commitment 	<ol style="list-style-type: none"> 1. Joint working to improve benefits to all Approved Contractors 	
ID Card			

Annex B

Water Supply (Water Fittings) Regulation 1999

Water Company (In-house) Approved Contractor Qualifications.

Following discussion at the WRAC Plumbing Working Group meeting on the 9th July 2002, under item 3 (c) of the minutes I have contacted the four Water Companies who operate their own in-house Approved Contractor schemes regarding their criteria for applicants to demonstrate knowledge of the Regulations in order to attain Approved Contractor status.

All other Water Companies operate their schemes through the central services of WIAPS (The Water Industry Approved Plumber Scheme).

The four companies in question are Anglian, Severn Trent, Thames and Yorkshire.

“Yorkshire operate differently to the three other companies. Their revised scheme combines the former scheme operated under the Water Byelaws and the new requirements contained within the Regulations and as such has two elements.

The first element of the scheme relates to “plumbers” who undertake a wide range of plumbing related work who are not qualified to self certificate under the Regulations. In this case they are members of a recognised professional, or trade, organisation and are, in effect just on a list of plumbers. Should a member of the public enquire if any plumbers are known in their particular area, who undertake a specific type of work, details of the companies on this list would be given out.

The second element is for plumbers or companies who undertake work that is specifically identified under the Regulations, and wish to self certificate their work. The entry criteria for these members with respect to their knowledge of the Regulations is to hold either the BPEC or City & Guilds certificate. This is the same entry criteria as WIAPS or the organisations approved under the Regulations.”

For Anglian, Severn Trent and Thames, whilst accepting the BPEC and City & Guilds certificate, these companies also utilise their own entry knowledge assessment.

The Anglian and Severn Trent assessments are virtually identical;

Anglian set 24 questions and the pass mark is to attain 18/24 with a 45-minute time limit. (The scheme has two papers "domestic" and "non-domestic" depending upon the principle work undertaken by the applicant)

Severn Trent set 25 questions, with a possible maximum mark of 40. The pass mark is to attain 30/40 with again a 45 minute time limit.

Both companies' papers cover a cross section of questions across the Regulations, and are open book assessments.

The Anglian paper is taken on application with no training whilst the Severn Trent paper would normally be taken at the conclusion of a one day training event.

Thames sets two papers; a general question paper containing 24 questions with a pass mark of 20/24, and a second paper on the prevention of contamination with 16 questions and a pass mark of 16/16.

The Thames assessment is taken following a two day in-house training course.

In comparison the BPEC assessment has three elements, 30 questions open book (1 hour), 20 questions closed book (30 mins), and assessment of 10 slides (30 mins). All have an 80% pass mark.

The City & Guilds assessment for contractor's personnel (as distinct from the inspector's qualification) has 45 questions in two sections; 30 general questions and 15 questions on the prevention of contamination. The pass mark is 24/32 marks on the general section and 12/15 marks on the contamination section. The total assessment time is one hour. All are open book assessments.

It was emphasised by both Anglian and Severn Trent that the knowledge assessment is only part of the entry criteria and, in addition, applicants must be able to demonstrate craft skills. The Anglian scheme is also subject to third party assessment, being an ISO and IIP registered company, whilst Severn Trent place an emphasis on the customer care policy of each applicant.

Members are also subject to ongoing audits of their work.

Terry Stephenson, August 2002

Annex C

Summary of Quality Mark Entry Requirements

To join the government-backed register of independently approved tradesman you have to demonstrate you are up to the mark. After completing a simple application form assessors from a certification body licensed by the Department of Trade and Industry will contact you to arrange a visit. The length of the visit will depend on a number of things, including the size of your company and the number of trades you are being assessed against. For a small company this is likely to take from half to a full day.

The aim is to keep paperwork to a minimum and use a site visit to jobs in progress, or recently completed, to look at practical examples of your workmanship. If any gaps are found help is available to meet Quality Mark standards.

The general assessment requirements are set out below. Your certification body will be able to advise you on what these mean in practice.



Area	Minimum requirement
Technical capability	<ul style="list-style-type: none"> • Adherence to all statutory regulations, including the Building Regulations. • Compliance with recognised good practice based on recognised industry materials and workmanship standards. • Management structure to ensure effective supervision.
Employee skills and qualifications	<ul style="list-style-type: none"> • Appropriately qualified staff, based on NVQs or equivalent. • Use of at least one skilled operative for every two non-skilled operatives.
Financial probity	<ul style="list-style-type: none"> • Fixed business address. • A simple financial stability check. • Validated statement of tax status.
Customer care and commitment to the Quality Mark Code of Practice	<ul style="list-style-type: none"> • Demonstration of a commitment to customer care. • Adherence to code of practice for Quality Mark builders and contractors, including: <ul style="list-style-type: none"> - provision of clear information on the services offered, the price and the timetable - use of a written contract - operation of a simple customer complaints procedure compliant with good practice.
Warranty	<ul style="list-style-type: none"> • Hold Quality Mark warranty – which includes cover for deposits or advance payments, poor workmanship and major defects.
Health & safety	<ul style="list-style-type: none"> • Compliance with statutory health & safety requirements. • Provision of a written health & safety policy statement, understood by all staff. • Methods of work must take account of a risk assessment and the person responsible for safety in the work area identified. • Compliance with statutory waste disposal requirements, together with the provision of a policy statement covering waste disposal, especially hazardous waste.
Liability insurance	<ul style="list-style-type: none"> • Provision of public liability insurance to a minimum level of £2m. • Compliance with statutory requirements for employers liability insurance.
Management procedures	<ul style="list-style-type: none"> • Follow sound building practice using reasonable skill, care and progress in the building process. • Proper management of contracts, purchase of materials and responsibility for sub-contractors. • Demonstrate a commitment to improved quality management.