



3.7 Complaints against Registered Gas Installers (RGIs)

Version History:

Version	Date Released	Contributor(s)	Description
Draft 1.0	12.12.2022	SGS	Initial SOP
Draft 1.1	21/12/2022	CRU	Review and update of the terms depending on the context

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1 Definitions

Body/ GSSB	means Safe Energy Ireland appointed by the Commission, pursuant to the Act, to act as the Gas Safety Supervisory Body to operate the RGI Scheme;
Commission / CRU	means the Commission for Regulation of Utilities as established further to the 1999 Act;
Criteria Document	means the Criteria Document which is specified and published by the Commission pursuant to the Act and as may be amended from time to time;
Customer	means, as the case may be, a customer of an RGI or another Third Party;
Domestic Gas Works	means a category of Gas Works designated as such by regulations;
Domestic Gas Safety award (DGS)	means the award offered by QQI for Domestic Gas Safety;
Domestic Gas Assessment (DGA)	means five-year competency assessment for domestic gas installers, approved by INAB
Gas Works	means classes of gas works as provided for under regulations;
Registered Gas Installer or RGI	means any party who is registered by the Body pursuant to the Act;
Registered Gas Installer Scheme / RGI Scheme	means the gas statutory regulatory scheme
QQI	means Quality and Qualifications Ireland the State agency responsible for promoting quality and accountability in education and training services in Ireland responsible for promoting quality and accountability in education and training services in Ireland

2 Scope

This procedure addresses complaints received by the GSSB in respect of work completed by a Registered Gas Installer (RGI).

Under the CRU Criteria Document Section B paragraph 5.3.3, the GSSB shall only be required to deal with complaints in so far as they relate to:

- (i) aspects relating to the regulation of RGIs by the RGI Scheme;
- (ii) the safety of the Gas Works carried out by an RGI;
- (iii) the operations of the RGI Scheme.

In line with CRU Criteria Document Section B paragraph 5.3.3, the GSSB shall not investigate complaints which fall outside of the circumstances listed in (i), (ii) and (iii) above, unless otherwise instructed by the CRU.

This procedure addresses complaints received by the GSSB in respect of **(ii), the safety of the gas works carried out by an RGI.**

If the GSSB receives a complaint which falls outside the scope as detailed above, the GSSB will advise the complainant of its role and the scope of its role with respect to complaints and the fact that it is not legally entitled to deal with any complaint which falls outside the scope.

2.1 Valid complaints

Valid complaints include any complaints that fall within the scope of this procedure as defined above (see also 2.2). The complaints could be received from a variety of sources including:

- Customers of RGIs
- Other RGIs
- GSSB staff, inspector or administrative

The complaints may be submitted to the GSSB via the following methods:

- Online complaints form
- Email to RGI
- Telephone

2.2 Invalid Complaints

The RGI Scheme Complaints Procedure does not deal with the following aspects of a Complaint:

1. Contractual or commercial matters of any kind, such as the price charged for the works or whether correct payment has been made to the RGI for works completed.
2. Complaints about aspects of works which are not 'Gas Works' as defined in legislation¹.
3. Complaints about aspects of works which are not directly related to gas safety.
4. Complaints where subsequent action has been taken by some other gas installer. In such cases, the GSSB may be unable to firmly establish, by means of an on-site inspection, whether the work originally complied with the relevant gas standard.
5. Non-compliance with specific requirements which fall outside the scope of Irish Standard for Domestic Gas Installations (I.S. 813), or Leisure accommodation Vehicles (I.S. EN 1949).
6. Complaints about works or gas works carried out by persons other than RGIs.
7. The RGI Scheme complaints procedure is normally only applicable to gas work which has been completed less than two years from the date the complaint was first registered with the RGI Scheme.

The GSSB regards its complaints procedure as separate and an alternative to litigation regarding matters within the scope of the RGI Scheme safety remit.

Notes; ¹S.I. No. 225/2009 - Electricity Regulation Act 1999 (Gas Works) Regulations 2009

S.I No. 299/2011 – Electricity Regulation Act 1999 (Liquefied Petroleum Gas Works) Regulations 2011

3 Complaint Procedure

All timelines outlined below are in working days.

All communications will be sent via email, unless email is not possible in which case letters may be sent via post.

Step	Step Description	Timing	Method/Action	From / By
1	Acknowledge Complaint Once complete, proceed to step 2	1 day from receipt of complaint	<ul style="list-style-type: none">• Receive complaint form• Acknowledge receipt• Complaint logged onto Complaints Manager	Complaint Officer

			<ul style="list-style-type: none"> • Complaint number assigned 	
2	<p>Determine if complaint:</p> <p>a) Is in scope b) Is valid c) Requires an inspection</p> <p>If yes to a), b) and c), proceed to step 4 If other, proceed to step 3</p>	3 days from step 1	<ul style="list-style-type: none"> • Refer to section 1 of procedure • Seek assistance from technical expert if necessary • Contact complainant for further information if necessary 	Complaint Officer
3	<p>Complaint is invalid or out of scope Complaint does not require an inspection (minor and facts agreed) Complaint closed</p>	3 days from step 2	<ul style="list-style-type: none"> • If valid: Forward complaint to RGI Take action to resolve complaint Email complainant and RGI to confirm issue is resolved • If invalid: Email complainant to inform them • Update Complaints Manager • Close complaint 	Complaint Officer & Inspector
4	<p>Complaint requiring an inspection Once complete, proceed to step 5</p>	5 days from step 2	<ul style="list-style-type: none"> • Arrange a suitable date with complainant • Request RGI attends • Update Complaints Manager 	Complaint Officer & Inspector
5	<p>Hold Inspection</p> <p>a) If issues resolved on site, proceed to step 6 b) If follow-up required, proceed to step 7 c) If RGI does not attend, proceed to step 8 d) If complainant does not allow RGI to attend, proceed to step 9</p>	10 days from step 4	<ul style="list-style-type: none"> • Carry out inspection • Complete inspection report • Submit report to Complaint Officer • Escalate to disciplinary proceedings if necessary 	Inspector
6	<p>Breaches rectified Cert issued Complaint closed</p>	5 days after inspection	<ul style="list-style-type: none"> • Finalise complaint report • Email RGI and complainant to confirm issue is resolved • Update Complaints Manager • Close complaint 	Complaint Officer

7	Follow-up required Repeat step if required If issue is resolved, return to step 6	7 days from inspection	<ul style="list-style-type: none"> • Agree time and date with RGI and complainant at inspection • Email RGI confirming time and date and attach invoice • Update Complaints Manager • Complete inspection • Submit report to Complaint Officer 	Complaint Officer & Inspector
8	RGI does not attend the inspection Proceed to step 10 or 11	10 days from step 4	<ul style="list-style-type: none"> • Escalate to disciplinary proceedings in line with procedure • Request complainant submit COI form within 14 days 	Complaint Officer
9	Complainant does not allow RGI to attend inspection Proceed to step 10 or 11	10 days from step 4	<ul style="list-style-type: none"> • Request complainant submit COI form within 14 days • If complainant does not allow access, request assistance from the Commission in accordance with Section B paragraph 3.1.9 of the Criteria Document 	Complaint Officer
10	Change of Installer Form is completed by Complainant	10 days from inspection	<ul style="list-style-type: none"> • Finalise complaint report • Email RGI and complainant to confirm issue is resolved • Update Complaints Manager • Close complaint 	Complaint Officer
11	Complainant fails to submit a Change of Installer Form	10 days from inspection	<ul style="list-style-type: none"> • Finalise complaint report • Email RGI and complainant to confirm issue is resolved • Update Complaints Manager • Close complaint 	Complaint Officer

4 Review and Appeal

If the complainant is unsatisfied with the outcome of the complaint, they may request the GSSB conduct an internal review to ensure:

- The validity of the complaint was correctly determined
- The procedure was followed fully

Such a request must be in writing to the GSSB within 10 working days, specifying clearly why a review is being requested.

NB: if the request for a review falls outside the scope of this procedure, the original complaint will remain closed and a new complaint will be opened in line with the relevant procedure.

If the complainant remains unsatisfied with the outcome of this review, the complaint may then be escalated to the CRU to be appealed.

5 Associated Documents

- CRU Criteria Document CRU/20/088 (version 1.7)