

**In the Electrical Workers Registration
Board at Auckland**

CAS 1538

In the matter of a disciplinary proceeding pursuant to section 147(G) and (M) of
the Electricity Act 1992 ("the Act")

Against **Christopher Alexander French**
Electrician (E17509)

Hearing 25 September 2015

Counsel: R Denyer for the Investigator
C Lyon for the Respondent

Decision:

Judgement of the Board

Introduction

- [1] Mr French faced two disciplinary offences in relation to prescribed electrical work at [REDACTED]
- (a) he negligently created a risk of serious harm to any person or a risk of significant property damage through having carried out or caused to be carried out prescribed electrical work being a disciplinary offence under section 143(b)(ii) of the Act, in that he failed to have High Risk prescribed electrical work inspected before connection;
- Or In the alternative
- (b) he carried out or caused to be carried out prescribed electrical work in a negligent or incompetent manner being a disciplinary offence under section 143(a)(i) of the Act, in that he failed to have High Risk prescribed electrical work inspected before connection;
- Or In the alternative
- (c) he carried out or caused to be carried out prescribed electrical work in a manner contrary to any enactment relating to the prescribed electrical work that was in force at the time the work was done being a disciplinary offence under section 143(a)(ii) of the Act, in that he failed to have High Risk prescribed electrical work inspected before connection;
- AND
- (d) he failed to provide any return required being a disciplinary offence under section 143(f) of the Act, in that he failed to provide a certificate of compliance and an electrical safety certificate within 20 working days of completing the prescribed electrical work;
- AND
- (e) he employed, directed, or permitted un-authorised persons to do prescribed electrical work being an offence under section 143(g) of the Act, in that he left trainees onsite to carry out prescribed electrical work without direct supervision.
- [2] Mr French is a Licenced Electrician Registration Number E17509.
- [3] The complaint was made in writing on 5 September 2014 from [REDACTED] (the Complainant). An Investigator was appointed and she determined the complaint should be considered by the Electrical Workers Registration Board ("the Board").
- [4] The disciplinary offences were laid in a Notice of Hearing dated 6 May 2015 and were set down for a hearing on 26 June 2015. On 21 May 2015 Counsel for the Investigator sought an adjournment. This was initially declined but once contact was made with Counsel for the Respondent an adjournment was granted and the matter was set down for a hearing on 25 September 2015.
- [5] The hearing was held in Auckland on 25 September 2015.

- [6] No Board Members declared any conflicts of interest in relation to the matters under consideration.

Substance of the Complaint

- [7] The Complainant attended the property to carry out work on a smart meter in August 2014 he found the meter was not sealed and on enquiry was advised that the switchboard had been shifted and upgraded some five months earlier and that the occupier was not aware of an inspection of the prescribed electrical work having been carried out.
- [8] A search of the High Risk database did not return any records for the address. The Complainant requested a Record of Inspection from the Respondent and received a Record of Inspection dated 14 August 2014.
- [9] The Investigator made enquiries with the Respondent as to who carried out the prescribed electrical work. The Respondent advised he supervised two trainees who carried the prescribed electrical work.
- [10] The Investigator considered the prescribed electrical work was high risk as defined by the Electricity (Safety) Regulations 2010 (the Regulations) which had to be inspected prior to livening and that the Respondent had failed to adequately supervise trainees and to provide the required certification for the prescribed electrical work on completion of the same.

Evidence

- [11] The following persons appeared, were sworn in, and gave evidence at the hearing:
- (a) [REDACTED] Complainant;
 - (b) [REDACTED] trainee in the employ of the Respondent ;
 - (c) [REDACTED] trainee in the employ of the Respondent;
 - (d) John McAlpine, Electrician and Electrical Engineer, expert for the Investigator; and
 - (e) Michael French, the Respondent.
- [12] Counsel for the Investigator called the Complainant and the two trainees to give evidence as to the prescribed electrical work alleged to have been carried out.
- [13] The Complainant confirmed the complaint and what he found when he attended the site.
- [14] The trainees gave evidence as to the prescribed electrical work they carried out under the supervision of the Respondent including the testing completed and of their experience and training in respect of prescribed electrical work. They further stated that:
- (a) the Respondent provided them with instructions and was present at the commencement of the prescribed electrical work and at livening;

- (b) the new switchboard was relocated some 3 metres from the original switchboard location
 - (c) the original switchboard was a formica backed board with ceramic fuses;
 - (d) the new switchboard was a 45 way Residual Current Device (RCD) protected switchboard which included additional circuits;
 - (e) no extensions were made to the mains or earth, the mains being long enough to reach the new switchboard position; and
 - (f) they had both had extensive trade experience prior to becoming trainees.
- [15] Mr McAlpine confirmed his report and credentials as an expert. His opinion was that:
- (a) the upgrading or relocation of a main switchboard involved alterations to the mains cable and main earthing conductor. This was then deemed to be high-risk prescribed electrical work which had to be inspected and certified prior to the power being permanently reconnected;
 - (b) the trainees should have been working under the Respondent's direct supervision; and
 - (c) a Certificate of Compliance must be issued for high-risk work within 20 working days of completion.
- [16] Mr French gave his evidence. Prior to the hearing in response to the complaint he had provided written explanations as to what occurred on site and details of the trainees' experience, both of whom had been in the trade for more than ten years.
- [17] At the hearing he stated he had worked in the industry for 25 years having taken over a family business. On the day he attended the site when the disconnection took place describing how it was completed and the tests carried out. He then left the site for a meeting and returned prior to the reconnection taking place. He stated that he normally gets the line company [REDACTED] to disconnect and was not sure why he did not in this instance.
- [18] Mr French described his businesses practices as they pertain to electrical safety certificates including the use of reference stickers on the switchboard and introduced documentation including invoices and job sheets relating to the job and to business process around certification in general. He accepted the stickers used did not meet the requirements of a certificate of compliance or an electrical safety certificate. He stated the certificate itself is sent to the customer as part of the invoice for the job.
- [19] He also gave evidence as to the usual practices when reconnected power stating that the normal practice was to have an inspector attend and inspect prior to reconnecting at the end of the job and that the inspector would also reseal the meter.
- [20] Mr French could not recall whether he did or did not follow this normal practice in this instance but did state that on occasions the inspector does not turn up

when requested and that he did not have a system for checking and verifying whether or not the inspector had attended or not.

- [21] In terms of his supervision he stated he was present for the critical aspects of the prescribed electrical work, had carried out the tests shown on the job sheet but accepted it was not his handwriting on the job sheet, was available if needed and was satisfied with the work of the trainees. There were no issues or problems with the job.
- [22] Mr French also introduced into evidence of email correspondence received after the prescribed electrical work was complete and in anticipation of the hearing with:
- (a) Work Safe New Zealand where he enquired as to whether certain prescribed electrical work would be high-risk work and was advised that it was not. He was questioned as to whether the work described in the email was the same as that which was undertaken in that there was no mention of the relocation of the board or the increase in capacity. The Respondent considered the description provided was accurate; and
 - (b) [REDACTED] giving advice as to what he considered was low-risk work and the advice he and students had received from Work Safe.

Counsel for the Respondents Submissions

- [23] Counsel for the Respondent submitted that the Respondent's rights under the Bill of Rights Act 1990 had been breached in that, in the correspondence to the Respondent setting out the charges, did not inform him of his rights and in particular those in sections 24 and 25 of the Bill of Rights Act. In this respect the Board notes the trigger to the rights is being "Charged" with an offence and that Justice Tipping in *Dental Council of New Zealand v Bell* [1992] 1 NZLR 438 held that "Charged" means in relation to a criminal offence and cannot apply to some lesser form of disciplinary proceeding which the proceedings under the Electricity Act are.
- [24] Counsel also pointed out several errors in the Notice of Hearing. Whilst acknowledging the errors the Board is satisfied that the information provided was sufficient to adequately inform the Respondent and did not prejudice his defence.
- [25] Counsel submitted that:
- (a) the prescribed electrical work undertaken was low-risk based on the advice received and the definitions in the Regulations and as there was doubt over the definition of high-risk the Board should err in favour of the Respondent;
 - (b) the supervision provided was adequate and in accordance with the Respondent's obligations and that there was no statutory obligation for direct supervision;
 - (c) a certificate of compliance was not required as the prescribed electrical work was not high-risk; and

- (d) the Investigator had failed to prove the case to the requisite burden of proof.

Legal Principles

Burden and standard of proof

- [26] The Board must be satisfied on the balance of probabilities that the disciplinary offences alleged have been committed. The relevant authority is *Z v Dental Complaints Assessment Committee* [2009] 1 NZLR 1.

Disciplinary Offences

- [27] The offences have been laid as alternatives of negligently creating a risk of serious harm, carrying out or causing to be carried out in a negligent or incompetent manner or in a manner contrary to an enactment.
- [28] Serious harm is defined in section 2 of the Act as meaning
- (a) death; or
 - (b) injury that consists of or includes loss of consciousness; or
 - (c) injury that necessitates the person suffering the injury—
 - (i) being admitted to hospital; or
 - (ii) receiving medical treatment from a health practitioner who is, or is deemed to be, registered with an authority established or continued by section 114 of the Health Practitioners Competence Assurance Act 2003 as a practitioner of a particular health profession
- [29] There is no statutory definition of the terms negligence or incompetence. They were, however, considered in the case of *Beattie v Far North Council* 1 where Judge McElrea provided useful guidance on the interpretation of these terms:
- “...the term negligence...focuses on a practitioner’s breach of their duty in a professional setting. The test as to what constitutes negligence... requires as a first step in the analysis, a determination of whether or not, in the Tribunal’s judgment, the practitioner acts or omissions fall below the standards reasonably expected of a... practitioner in the circumstances of the person appearing before the Tribunal. Whether or not there has been a breach of the appropriate standards is measured against standards of a responsible body of the practitioner’s peers.”*
- [30] Judge McElrea continue:
- “...However, in a case brought to my attention by Mr Corkill, Gendall J stressed that not all negligence or malpractice amounts to professional misconduct but only “behaviour that falls seriously short of what is to be considered acceptable and not mere inadvertent error, oversight or for that matter carelessness”. While the legislation I am considering does not require a finding of “professional misconduct”, this is a timely reminder that disciplinary sanctions should not be applied unless there is a serious issue being addressed. (The fact that no loss or*

¹ Judge McElrea, DC Whangarei, CIV-2011-088-313

damage has occurred can be very relevant in that context but is not determinative of the matter.)..."

"...a "negligent manner" of working is one that exhibits a serious lack of care judged by the standards reasonably expected of such practitioners, while an "incompetent" manner of working is one that exhibits a serious lack of competence (or deficient in the required skills)..."

"...negligent" and "incompetent" have a considerable area of overlap in their meanings, but also have a difference focus – negligence referring to a manner of working that shows a lack of reasonably expected care, and incompetence referring to a demonstrated lack of reasonably expected ability or skill level..."

Supervision

- [31] The Act provides for exemptions whereby prescribed electrical work can be done by a person under supervision including trainees who hold a Limited Certificate under section 77 of the Act. Persons who carry out prescribed electrical work under a Limited Certificate issued by the Board² are also required to work under supervision by way of a condition on their Certificate.

- [32] The Act defines supervision in section 2:

Supervision, in relation to any work, means that the work is undertaken under such control and direction of a person authorised under this Act to do the work [or, in the case of section 76, a person authorised to supervise work under that section] as is sufficient to ensure—

- (a) *That the work is performed competently; and*
- (b) *That while the work is being undertaken, appropriate safety measures are adopted; and*
- (c) *That the completed work complies with the requirements of any regulations made under section 169 of this Act.*

- [33] In *The Electrical Workers Registration Board v Gallagher*³ Judge Tompkins stated at paragraph 24:

"As is made apparent by the definition of "supervision" in the Act, that requires control and direction by the supervisor so as to ensure that the electrical work is performed competently, that appropriate safety measures are adopted, and that when completed the work complies with the requisite regulations. At the very least" supervision in that context requires knowledge that work is being conducted, visual and other actual inspection of the work during its completion, assessment of safety measures undertaken by the person doing the work on the site itself, and, after completion of the work, a decision as to compliance of the work with the requisite regulations."

- [34] The Board also maintains Supervision Guidelines to provide assistance to practitioners and trainees.

Low-Risk and High-Risk

² Limited Certificates are issued to apprentices and trainees

³ District Court at Te Awamutu, 12 April 2011

- [35] Regulation 6A of the Regulations defines what is low-risk, high-risk and general prescribed electrical work. It states:

- 6A *Meaning of low-risk, high-risk, and general prescribed electrical work*
- (1) *In these regulations, low-risk prescribed electrical work—*
- (a) *means prescribed electrical work that comprises the maintenance or replacement of a fitting in an existing installation; and*
 - (b) *includes relocation or extension of a conductor to facilitate replacement of a fitting; but*
 - (c) *excludes maintenance that involves the adjustment of protection or gas monitor settings of mining electrical equipment.*
- (2) *In these regulations, high-risk prescribed electrical work means the prescribed electrical work (not being low-risk prescribed electrical work) that—*
- (a) *comprises or includes the installation, or adjustment of the settings, of any of the following:*
 - (i) *an extra-low or low voltage installation that does not, or will not, comply with Part 2 of AS/NZS 3000:*
 - (ii) *an installation that operates, or will operate, at high voltage (other than high voltage discharge lighting, high voltage mobile mining electrical equipment, and high voltage relocatable mining electrical equipment):*
 - (iii) *a mains parallel generation system in an installation:*
 - (iv) *a photovoltaic system in an installation:*
 - (v) *an installation that is, or will be, located in a hazardous area other than an ERZO or ERZ1:*
 - (vi) *an installation that is, or is intended, for use with electrical medical devices:*
 - (vii) *any fittings (including any neutral earth resistors and earth leakage circuit breakers) that—*
 - (A) *control earth potential rise; and*
 - (B) *are not part of any relocatable mining electrical equipment:*
 - (viii) *any fittings or appliances that are not part of any relocatable mining electrical equipment and are used or installed, or to be used or installed, in an ERZO or ERZ1:*
 - (b) *is mains work on an installation:*
 - (c) *is work on an installation's animal stunning appliances or meat conditioning appliances:*
 - (d) *is work on low voltage AC railway signalling equipment except where the equipment has been tested in accordance with ECP 60 and the work has been carried out in accordance with AS/NZS 3000:*
 - (e) *comprises or includes the construction of any relocatable mining electrical equipment, including fittings that control earth potential rise (such as neutral earth resistors, neutral earth reactors, and earth leakage circuit breakers):*
 - (f) *comprises the connection of a supply of electricity from an above-ground supply to mining electrical equipment, or conductors supplying mining electrical equipment, that are located in the underground parts of an underground mining operation:*
 - (g) *includes the adjustment of the settings of—*

- (i) any isolation fittings of mining electrical equipment:
 - (ii) gas monitors used in a mining operation.
- (3) In these regulations, general prescribed electrical work means any prescribed electrical work on an installation, or on mining electrical equipment, that is not low-risk prescribed electrical work or high-risk prescribed electrical work.
- (4) To avoid doubt, work done on an installation by a person acting under the exemption in section 79 of the Act (an exemption for domestic electrical wiring work) is not categorised as low-risk, high-risk, or general prescribed electrical work, unless, in order to comply with regulation 57, the work is required to be certified, in which case the work is to be categorised in accordance with subclauses (1) to (3) of this regulation.

- [36] Maintenance is defined in the Regulations as “maintenance includes repair”. Replacement is not defined, nor is repair.
- [37] The general scheme of the regulation is that if prescribed electrical work falls within the definition of low-risk that it cannot be high-risk.

Statutory Interpretation

- [38] The Board is required to interpret legislation to ensure it gives effect to the purpose of Parliament⁴. In general terms, the current approach to statutory interpretation is the purposive approach. The purposive approach is described in the Supreme Court case of *Allied Concrete Ltd v Meltzer*:⁵

The Court's task is to ascertain the meaning of the provisions from their language, read in context, and the statute's purpose informed by any relevant background material.

- [39] The Board may, if necessary in ascertaining the meaning, consider other indications provided in the regulation and the empowering enactment. In this respect section 1A, Purposes of the Act and section 169 which is the enabling provision under which regulations can be made is relevant. They state in part:

Section 1A Purposes

The purposes of this Act are—

- (c) to protect the health and safety of members of the public in connection with the supply and use of electricity in New Zealand; and
- (d) to promote the prevention of damage to property in connection with the supply and use of electricity in New Zealand; ...

Section 169 Regulations

- (1) The Governor-General may from time to time, by Order in Council, make regulations for all or any of the following purposes:

Electrical Safety and Related Matters

- (2) Securing the protection of persons and property from injury or damage caused through electricity, either directly or indirectly, by—

- [40] The key aspects of both are electrical safety and the protection of persons and property.

⁴ Refer s 5 of the Interpretation Act 1999

⁵ [2015] NZSC 7 at [55]

Decision

- [41] The Board has come to a unanimous decision that Mr French is guilty of:
- (a) a disciplinary offence under section 143(a)(ii) of the Act in that he carried out or caused to be carried out prescribed electrical work in a manner contrary to any enactment relating to the prescribed electrical work that was in force at the time the work was done when he failed to have High Risk prescribed electrical work inspected before connection; and
 - (b) a disciplinary offence under section 143(f) of the Act in that he failed to provide a certificate of compliance within 20 working days of completing the prescribed electrical work.
- [42] The Board has come to a unanimous decision that Mr French is not guilty of a disciplinary offence under section 143(g) of the Act in that he did not employ, direct, or permit un-authorised persons to do prescribed electrical work.

Boards Reasoning

Inspection of High-Risk Prescribed Electrical Work

- [43] The Board accepts that the default in the Regulations as regards high-risk, low-risk and general prescribed electrical work is that of low-risk. The question though in the case before it is the extent to which work can be defined as maintenance, repair or replacement.
- [44] The Board considers that, taking into consideration the principles of statutory interpretation set out above, a restrictive interpretation of the terms “maintenance” and more particularly “replacement” are necessary in order to give effect to the purposes of the Act. To this end the Board considers “replacement” as being “like-for-like replacement”.
- [45] The Act is clearly concerned with the safety of persons and properties involved in the supply and use of electricity in New Zealand. In the Board’s view the purpose of classifying maintenance and replacement work as low-risk is because there is less risk in maintaining or replacing fittings once they have been installed than there is in installing new fittings. However, where a fitting being replaced is not like-for-like, there are new risks involved which are more akin to a new installation.
- [46] In the present case a formica switch board containing ceramic fuses has been moved and replaced with a larger capacity modern switch board equipped with RCD protection and additional circuits have been added. The prescribed electrical work cannot be considered as “like for like”. What has occurred is an upgrade to the existing fittings.

- [47] This interpretation is consistent with advice promulgated by Work Safe in its 31 July 2015 Electrical Safety Bulletin relevant extracts of which follow:

Type of Prescribed Electrical Work	Relevant Legislation	Additional Guidance
Replacement	Established in ESR 6A. Allows relocation or extension only to replace a fitting.	In all cases this is low risk work. Replacement is principally driven by ESR 59. ESR 59(3) allows restoration to "Original condition".
Upgrade		When in accordance with manufacturer's instructions, or AS/NZS 3000, upgrading is a replacement. Upgrading to address increased supply fault rating is also a replacement. The installation of higher capacity fittings to address increased usage of an installation is an alteration. For mains work this becomes high risk.

- [48] As the prescribed electrical work undertaken involved mains work, the definition of which is provided below, it became high-risk work and an inspection was required prior to livening.

mains work —

(a) *means any of the following:*

- (i) *work on mains (including connecting the conductors of mains at a MEN switchboard):*
- (ii) *work on main earthing systems (including connecting the conductors of main earthing systems at a MEN switchboard):*
- (iii) *work on the connection between earth and neutral made by the removable link within the MEN switchboard closest to the point of supply; but*

(b) *does not include—*

- (i) *work on fittings that are used or intended for use by any person in, or in connection with, the generation of electricity for that person's use and not for supply to any other person; or*
- (ii) *work that is limited to removing or replacing the removable link within a MEN switchboard for the purposes of testing; or*
- (iii) *the installation of a revenue meter, but only if the work cannot affect the integrity of the neutral or result in the transposition of the neutral and any active conductor.*

- [49] On the evidence before it an inspection clearly did not take place and as such the elements of the disciplinary charge are satisfied.
- [50] The Board notes the email advice received by the Respondent but notes the description provided was not accurate and had it been then it is likely the prescribed electrical work would have been considered to be an upgrade which required inspection.

Certificate of Compliance

- [51] In respect of the certificate of compliance as the prescribed electrical work undertaken was high-risk there was an obligation to provide the certificate within 20 working days of completion and this did not occur.

Supervision

- [52] The Board was satisfied, on the basis of the evidence before it, that the supervision provided by Mr French was adequate and that it met the Board's Supervision Guidelines. The Board notes in this respect that the two trainees both had extensive trade experience and that Mr French was present and provided direct supervision for the critical aspects of the prescribed electrical work.

Penalty

- [53] The Board is aware that the common understanding of the purposes of professional discipline is to uphold the integrity of the profession. Those purposes were recently reiterated by the Supreme Court of the United Kingdom:

"The primary purpose of professional disciplinary proceedings is not to punish, but to protect the public, to maintain the public confidence in the integrity of the profession and to uphold proper standards of behaviour".⁶

- [54] Section 147M of the Act sets out the Board's disciplinary powers and the Board may take any mitigating or aggravating factors into consideration as well as the seriousness of the offences and any previous history before the Board.
- [55] Counsel for Mr French made submissions in respect of penalty which the Board has taken into consideration. The Board has also taken into account the doubt as to inspections requirements which can arise under Regulation 6 of the Regulations and the fact that the prescribed electrical work was carried out competently by firstly reducing the charge to one of contrary to an enactment and secondly by reducing the overall penalty.
- [56] In all the circumstances the Board considers a consolidated fine of \$1,200 in respect of both matters to be the appropriate penalty.

⁶ *R v Institute of Chartered Accountants in England and Wales* [2011] UKSC 1, 19 January 2011.

Costs

- [57] The Board may, under section 147N of the Act, make an order for the payment of a sum that it considers just and reasonable towards the costs and expenses of, and incidental to, the investigation of the complaint, the prosecution of the complaint by the investigator or the hearing by the Board.
- [58] The High Court has held that 50% of total reasonable costs should be taken as a starting point in disciplinary proceedings and that the percentage can then be adjusted up or down having regard to the particular circumstances of each case. The judgement in *Cooray v The Preliminary Proceedings Committee*⁷ included the following:
- "It would appear from the cases before the Court that the Council in other decisions made by it has in a general way taken 50% of total reasonable costs as a guide to a reasonable order for costs and has in individual cases where it has considered it is justified gone beyond that figure. In other cases, where it has considered that such an order is not justified because of the circumstances of the case, and counsel has referred me to at least two cases where the practitioner pleaded guilty and lesser orders were made, the Council has made a downward adjustment."*
- [59] The judgment in *Macdonald v Professional Conduct Committee*⁸ confirmed the approach taken in *Cooray*. This was further confirmed in a complaint to the Plumbers, Gasfitters and Drainlayers' Board, *Owen v Wynyard*⁹ where the judgment referred with approval to the passages from *Cooray* and *Macdonald* in upholding a 24% costs order made by the Board.
- [60] The Board considers the defence of the charges to be justified and has reduced the costs accordingly. An amount of \$250 is considered as an appropriate contribution toward the costs of and incidental to the investigation and hearing.

Publication

- [61] Under section 147Z the Board may, if no appeal is brought in respect of its decision, direct the Registrar to cause a notice stating the effect of the decision or order, the reasons for the decision or order, and (unless the Board directs otherwise) the name of the person in respect of whom the decision or order was made, to be published in the Gazette and any other publications as may be directed by the Board.
- [62] The Board heard submissions from Mr French's Counsel in respect of publication. The matter before it is an important one where education of the industry is required. As such the matter will be published but Mr French will not be identified.

⁷ HC, Wellington, AP23/94, 14 September 1995

⁸ HC, Auckland, CIV 2009-404-1516, 10 July 2009

⁹ High Court, Auckland, CIV-2009-404-005245, 25 February 2010

Right of Appeal

[63] Mr French's attention is brought to the provisions of section 147ZA of the Act which provides:

- (1) A person who is dissatisfied with the whole or any part of any of the following decisions, directions, or orders may appeal to a District Court against the decision, direction, or order:
 - (a) any decision of the Board to decline to register the person or to decline to issue a licence to the person or to decline to renew the licence of the person
 - (b) any decision of the Board to decline to issue a limited certificate under section 78 to the person or to decline to renew the limited certificate of the person:
 - (c) any decision of the Board to suspend or cancel the person's registration or licence:
 - (d) any decision of the Board to impose any term or condition in relation to the person's registration or licence or to vary any of those terms or conditions:
 - (e) any decision, direction, or order under any of sections 108, 109, 120, 133, 137, and 153 or Part 11 (except section 147C).

Date: 28 October 2015



Signature: Neil McLeod
Presiding Member, Electrical Workers Registration Board