



# Electrical Safety Policy 2024

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## **1. INTRODUCTION**

- 1.1 Although the UK has a fairly good record of electrical safety, there are still over 30 deaths and nearly 4,000 injuries from electrical accidents that occur in the home each year. A large number are related to electrical maintenance or DIY activities. The major dangers to health from electrical accidents are from shock, burns, electrical explosion or arcing, fire, and mechanical movements initiated by electricity.
- 1.2 Granville Community Homes (GCH) is responsible for the maintenance and repairs to its homes and other buildings, all of which will contain electrical installations and appliances. The Landlord and Tenant Act 1985 and the Housing Act 2004 place duties on landlords to ensure that these electrical installations are safe at the start of any tenancy and are maintained in a safe condition throughout the tenancy.
- 1.3 GCH is also responsible for maintaining electrical installations and equipment in non-domestic (communal blocks) under the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016.

## **2. SCOPE OF THE POLICY**

- 2.1 GCH must establish a policy which meets the requirements for electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. In addition to this the policy must provide assurance to GCH that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with electrical installations and electrical portable appliances.
- 2.2 GCH must ensure compliance with electrical safety legislation is formally reported at Senior Management Team (SMT) and Board level, including the details of any non-compliance and planned corrective actions.
- 2.3 The policy applies to all companies within GCH and therefore this policy is relevant to all GCH employees, tenants, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 2.4 It should be used by all to ensure they understand the obligations placed upon GCH to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties (owned and managed).



### **3. RESPONSIBILITY**

#### **3.1 Key Roles and Responsibilities**

- 3.1.1 GCH board will have overall governance responsibility for ensuring the Electrical Safety Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such the Board will formally approve this policy and review it periodically. The first review will be undertaken 18 months after the approval of this new policy, and then every two years thereafter (or sooner if there is a change in regulation, legislation or codes of practice).
- 3.1.2 The Board will receive regular updates on the implementation of the Electrical Safety Policy and electrical safety performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.
- 3.1.3 SMT will receive reports in respect of electrical safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.1.4 GCH has strategic responsibility for the management of electrical safety and ensuring compliance is achieved and maintained. GCH will oversee the implementation of the Electrical Safety Policy.
- 3.1.5 GCH will be responsible for overseeing the delivery of the agreed electrical safety programme, and the prioritisation and implementation of any works arising from the electrical safety inspections.
- 3.1.6 The housing teams will provide key support in gaining access into properties where access is proving difficult and use standards methods to do so. They will also facilitate the legal process to gain access as necessary.

#### **3.2 Competent Persons**

- 3.2.1 GCH will ensure that the operational delivery is appropriately qualified; holding a recognised electrical safety management qualification. They should have or be working towards gaining the Level 4 VRQ in Electrical Safety Management (or equivalent). If they do not have this already, they should obtain it within 12 months of the approval of this policy.
- 3.2.2 GCH will ensure the manager with lead responsibility for operational delivery maintains Approved Electrical Contractor Accreditation with the National Inspection Council for Electrical Inspection Contracting (NICEIC) or equivalent for all areas of electrical inspection, testing, installation and repair works that they undertake.



3.2.3 The operational team with responsibility for delivery will check the relevant accreditations for the work that contractor and operatives are carrying out. These checks will be undertaken on an annual basis and evidenced appropriately.

## **4. POLICY**

### **4.1 Obligations**

4.1.1 The Landlord and Tenant Act 1985 places duties on landlords to ensure that electrical installations in rented properties are:

- Safe when a tenancy begins, Section 8 (1a)
- Maintained in a safe condition throughout the tenancy, Section 11 (1b)

4.1.2 In order to be compliant under these duties electrical installations are required to be periodically inspected and tested. The intervals between inspections are not absolutely set within any regulations, however, best practice guidance from the Electrical Safety Council and from BS7671:2018 states that electrical installations should be tested at intervals of no longer than 5 years from the previous inspection. Any deviation from these intervals should be at the recommendation of a competent NICEIC qualified (or equivalent) person and should be backed up by sound engineering evidence to support the recommendation.

4.1.3 All electrical installations should be inspected and tested prior to the commencement of any new tenancies (void properties), mutual exchanges and transfers and a satisfactory Electrical Installation Condition Report (EICR) should be issued to the tenant prior to them moving in.

4.1.4 The Electricity at Work Regulations 1989 places duties on employers that all electrical installations and appliances within the workplace are safe and that only competent persons work on the electrical installations, systems and equipment (Section 16).

4.1.5 The Electrical Equipment (Safety) Regulations 2016 requires Landlords to ensure that any electrical appliances provided as part of a tenancy are safe when first supplied and gifted to the tenant. If the appliance is not gifted an annual check will be undertaken as part of the portable appliance testing (PAT) programme.



## 4.2 Statement of Intent

- 4.2.1 GCH acknowledge and accept its responsibilities with regard to electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016.
- 4.2.2 GCH will hold accurate records against each property it owns or manages, identifying when the electrical installation was last inspected and tested.
- 4.2.3 Inspection and re-inspection dates, along with EICR records will be held electronically.
- 4.2.4 Following the data validation and catch-up programme, GCH has opted to deliver a comprehensive programme of testing and inspection to their different property types on a five-year cycle.
- 4.2.5 A safety inspection will be undertaken sooner than the stated period if recommended by the competent person.
- 4.2.6 New build properties and those which have been subject to a rewire will receive their first inspection and test 10 years after the date of installation, and every 5 years thereafter. This applies to general needs and supported living properties, communal blocks, and 'other' properties.
- 4.2.7 GCH will ensure that all electrical installations shall be in a satisfactory condition following completion of an electrical installation inspection and test.
- 4.2.8 GCH will ensure that a full electrical installation inspection retest is undertaken in the case of a change of occupancy (void properties), mutual exchanges and transfers for all properties excluding Supported Living accommodation – this is due to the fact that these tenancies are for rooms whose occupants can change on a daily basis and shared/supported living as the main property will be periodically tested. However, all properties will still be subject to the programmes and periodic inspection and testing.
- 4.2.9 GCH will ensure that only suitably competent NICEIC electrical contractors and engineers (or equivalent) undertake electrical works for the organisation.
- 4.2.10 GCH will carry out electrical installation inspection and tests and issue new satisfactory EICRs when completing planned component replacement works within domestic properties.



- 4.2.11 GCH will test hard-wired smoke alarms as part of the annual safety check visit (or at void stage).
- 4.2.12 GCH will have a robust process in place to gain access should any customer or leaseholder refuse access to carry out essential electrical safety related inspection and remediation works.
- 4.2.13 GCH will have a robust process in place to gain access to properties where customer vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the customer.
- 4.2.14 GCH will ensure that robust processes and controls are in place to manage the completion of follow up works identified during inspection and testing of electrical installations.

#### 4.3 **Compliance Risk Assessment/Inspection Programmes**

- 4.3.1 **Risk assessment** – GCH will establish and maintain a risk assessment for electrical safety management and operations. This risk assessment will set out the organisations' key electrical safety risks together with appropriate mitigations.
- 4.3.2 **Domestic properties** – GCH will carry out a programme of electrical installation inspection and testing to all domestic properties. This inspection and test will be carried out at intervals of no less than 5 years (unless the competent person recommends the next test must be done sooner than this) and will include the issuing of a new satisfactory EICR. This inspection and test is driven from the anniversary date of the most recent EICR which may have been carried out at the start of a new tenancy or following planned component replacement works.
- 4.3.3 **Supported Living** – GCH will carry out a programme of electrical installation inspection and testing to all supported living properties. This inspection and test will be carried out at intervals of no less than 5 years (unless the competent person recommends the next test must be done sooner than this) and will include the issuing of a new satisfactory EICR. This inspection and test is driven from the anniversary date of the most recent EICR, which may have been carried out at the start of a new tenancy or following planned component replacement works.



- 4.3.4 **Communal Blocks and 'Other' properties** – GCH will carry out a programme of electrical installation inspection and testing to all 'communal blocks' and 'other' properties (offices, HMO's, etc.), where there is a landlords' electrical installation (and GCH has the legal obligation to do so). This inspection and test will be carried out at intervals of no more than 5 years (unless the competent person recommends the next test must be done sooner than this) and will include the issuing of a new satisfactory EICR. This inspection and test is driven from the anniversary date of the most recent EICR which may have been carried out following planned component replacement works.
- 4.3.5 New build properties and those which have been subject to a rewire will receive their first inspection and test 10 years after the date of installation, and every 5 years thereafter.
- 4.3.6 **Properties managed/leased by others** – GCH will ensure they have records of a valid EICR where properties they own are leased/managed by others (managing agents/leaseholders). These properties will be included on GCH electrical inspection and testing programme, so a new EICR can be requested from the managing agent prior to the existing one expiring. If the managing agent fails to carry out the electrical inspection and test, GCH will step in and carry out the test and re-charge the managing agent for the cost of this work.

#### 4.4 **Compliance Follow up Work**

- 4.4.1 GCH will ensure there is a robust process in place for the management of any follow-up works required following the completion of a periodic inspection and test of an electrical installation.
- 4.4.2 GCH will ensure there is a robust process in place to collate and store all EICRs and associated records and certification of completed remedial works.
- 4.4.3 GCH will, as a minimum, make safe and/or where possible endeavour to repair all code 1 and code 2 defects identified by a periodic electrical installation inspection and test before leaving site after completing the inspection and testing works. Any further remedial works to code 2 defects will be completed within 5 working days and an EICR will be issued stating that the installation is in a satisfactory condition. Code 3 type works will be referred back to GCH (mechanical and electrical team) for a decision.



#### 4.5 Record Keeping

- 4.5.1 GCH will hold accurate records against each property it owns and/or manages, identifying when the electrical installation was last inspected and tested.
- 4.5.2 Inspection and re-inspection dates, along with EICR records will be held electronically.
- 4.5.3 GCH will establish and maintain accurate records of all completed EICRs, Minor Electrical Works Certificates (MEW), smoke/heat detector works, installation of emergency lighting and Building Regulation Part P notifications associated with remedial works from these reports and Electrical Installation Certificates and keep these as per the organisation's Data Retention Policy.
- 4.5.4 GCH will hold and maintain accurate records on the qualifications of all engineers undertaking electrical safety works for the organisation.
- 4.5.5 GCH will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all electrical safety related data.

### 5. REGULATORY STANDARDS, LEGISLATION, AND APPROVED CODES OF PRACTICE

- 5.1 **Regulatory Standards** - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH).
- 5.2 **Legislation** - the principle legislation applicable to this policy is the Landlord and Tenant Act 1985; the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. Section 8 of the Landlord and Tenant Act 1985 sets out implied terms as to fitness for human habitation and Section 11 of the Landlord and Tenant Act 1985 places repairing obligations in short leases. The Electricity at Work Regulations 1989 places duties on employers to ensure that all electrical equipment used within the workplace is safe to use. The Electrical Equipment (Safety) Regulations 2016 requires Landlords to ensure that any appliances provided as part of a tenancy are safe when first supplied GCH is the 'Landlord' by virtue of the fact that they own and manage homes and buildings housing tenants/leaseholders through the tenancy, lease and licence agreement obligations it has with the tenants/leaseholders.
- 5.3 **Code of Practice** – the principle approved codes of practice applicable to this policy are:



- 5.3.1 IET Wiring Regulations British Standard 7671: 2018 (18th edition)
- 5.3.2 The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE) 2012 (4th edition)
- 5.3.3 HSE INDG236: 'Maintaining portable electrical equipment in low risk environments' (as amended 2013)
- 5.3.4 Electrical Safety Council: 'Landlords' Guide to Electrical Safety 2009'.
- 5.3.5 Code of Practice for the Management of Electrotechnical Care in Social Housing (January 2019)
- 5.4 **Sanctions** – GCH acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.
- 5.5 **Tenants** – GCH will use the legal remedies available within the terms of the tenancy agreement, lease or licence should any tenant refuse access to carry out essential electrical safety checks, maintenance and safety related repair works.
- 5.6 **Additional Legislation** - This Electrical Safety Policy also operates in the context of the following additional legislation:
  - 5.6.1 Health and Safety at Work Act 1974
  - 5.6.2 The Management of Health and Safety at Work Regulations 1999
  - 5.6.3 The Workplace (Health Safety & Welfare) Regulations 1992
  - 5.6.4 Management of Houses in Multiple Occupation (England) Regulations 2006
  - 5.6.5 Housing (Scotland) Act 2006
  - 5.6.6 Regulatory Reform (Fire Safety) Order 2005
  - 5.6.7 The Building Regulations for England and Wales (Part P)
  - 5.6.8 The Housing Act 2004
  - 5.6.9 The Occupiers' Liability Act 1984
  - 5.6.10 Health and Safety (Safety Signs and Signals) Regulations 1996
  - 5.6.11 Provision and Use of Work Equipment Regulations 1998



5.6.12 Construction, Design and Management Regulations 2015

5.6.13 Data Protection Act 2018

5.6.14 RIDDOR 2013

5.7 This policy also has links to other Group policies, including:

5.7.1 Health and Safety Policy

5.7.2 Data Archival, Retention and Disposal Policy

## 6. IMPLEMENTATION

### 6.1 Training

6.1.1 GCH will ensure that all operatives working for, or on behalf of the organisation have the relevant training required for their role. This will be managed via periodic assessments of training needs and resulting programmes of internal and/or external training.

### 6.2 Performance Reporting

6.2.1 Robust key performance indicator (KPI) measures will be established and maintained to ensure GCH is able to report on performance in relation to electrical safety.

6.2.2 KPI measures will be produced and provided at SMT level on a monthly basis and Board level on a quarterly basis. As a minimum, these KPI measures will include reporting on:

#### **Data – the total number of:**

- Properties – split by domestic properties, communal blocks and 'other' properties
- Properties on the electrical inspection and testing programme
- Properties not on the electrical inspection and testing programme
- Properties with a valid 'in date' EICR. This is the level of compliance expressed as a number and a %
- Properties where the EICR has expired and is 'out of date'. This is the level of non-compliance expressed as a number and a %
- Properties which are due to be inspected and tested within the next 30 days. This is the early warning system.

#### **Narrative - an explanation of the:**

- Current position
- Corrective action required



- Anticipated impact of corrective action
  - GCH with completion of follow-up works
- 6.2.3 GCH will carry out 100% desktop audits on the documentation produced by the external contractor delivering the inspection and testing programme via the automated CORGI CDMS. In-house electrically qualified staff will also undertake monthly work in progress/post inspections and/or request that external contractors do the same and evidence upon request.
- 6.2.4 GCH will appoint a third party independent auditor to undertake quality assurance audits on a minimum 5% sample of electrical works and supporting documentation.
- 6.2.5 GCH will carry out an independent audit of electrical safety at least once every two years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues for correction.
- 6.3 Non-Compliance / Escalation Process**
- 6.3.1 Any non-compliance issue identified at an operational level will be formally reported to SMT, in the first instance.
- 6.3.2 The SMT will agree an appropriate course of corrective action in order to address the non-compliance issues.
- 6.3.3 SMT will ensure the Board is made aware of any non-compliance issue so they can consider the implications and take action as appropriate.
- 6.3.4 In cases of a serious non-compliance issue SMT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation as part of the Regulatory Framework.

## **7. CONSULTATION**

- 7.1 A series of consultation meetings have taken place when reviewing this policy, including a policy principles session with GCH Board.



## **8. REVIEW**

- 8.1 Ordinarily this policy will be reviewed following the GCH standard three yearly timeframe. However, an initial review timeframe of eighteen months (from February 2024, when the compliance roadmap is due to be completed) is being adopted to ensure that any changes required, following the implementation of new systems and processes, can be captured at the earliest opportunity.

## **9. EQUALITY IMPACT ASSESSMENT**

- 9.1 An EIA is currently being drafted alongside this policy review.