



City of London Corporation
Department of Community & Children's Services
Housing Division

ELECTRICAL SAFETY POLICY

Approved by:	<i>Housing Management & Almshouses Sub-Committee</i>
Original Approval Date:	
Review Date:	
Re-Approval Date	-
Next Review Date	<i>**3 years from re-approval**</i>

1. Purpose

This policy provides an overview of how we will meet legal requirements for electrical safety within tenanted properties and associated premises we manage. This policy provides assurance that measures are in place to ensure compliance with regulations and to identify, manage and/or mitigate risks associated with electrical installations and electrical portable appliances.

We will follow a systematic approach to the management of electrical work to ensure it meets the requirements set out in relevant legislation relating to electrical safety. This is to ensure the safety of residents, employees, and members of the public.

2. Scope

The policy applies to all employees, residents, contractors, and other persons who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon City of London to maintain a safe environment for residents and employees within the home of each tenant and within all non-domestic (communal) premises or shared areas of buildings.

3. Legislation and Regulation

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).

The principal legislation applicable to this policy is:

- Landlord and Tenant Act 1985;
- the Electricity at Work Regulations 1989
- Electrical Equipment (Safety) Regulations 2016

Code of Practice – the principal approved codes of practice applicable to this policy are:

- IET Wiring Regulations British Standard 7671: 2018 (18th edition)
- The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE) 2012 (4th edition)
- HSE INDG236: 'Maintaining portable electrical equipment in low-risk environments' (as amended 2013)
- Electrical Safety Council: 'Landlords' Guide to Electrical Safety 2009'.
- Code of Practice for the Management of Electro technical Care in Social Housing

This Electrical Safety Policy also operates in the context of the following additional legislation:

- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health Safety & Welfare) Regulations 1992
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Regulatory Reform (Fire Safety) Order 2005

- The Building Regulations for England and Wales (Part P)
- The Housing Act 2004
- The Occupiers' Liability Act 1984
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Construction, (Design and Management) Regulations 2015
- Data Protection Act 2018
- RIDDOR 2013

A process is in place to identify changes to regulation and legislation through City of London's compliance reporting framework, any changes relating to this policy will be highlighted and implemented, including a review of policy and procedural documents.

This policy also has links to other policies, including:

- Health and Safety Policy
- Record Management Policy

4. Regulator for Social Housing – Regulatory Standards

- Home Standard (Quality of Accommodation and Repairs and Maintenance)

The Housing Division acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation, and approved codes of practice. We understand the consequences of not meeting our duties and are committed to ensuring we have adequate measures in place to ensure the health and safety of occupants in their homes.

5. Aims

The Housing Division acknowledges and accepts its responsibilities regarding 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.

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

- Safe when a tenancy begins
- Maintained in a safe condition throughout the tenancy

To comply with 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 BS7671:2008 states that electrical installations should be tested at intervals of no longer than 5 years from the previous inspection.

The key objectives of the policy are to establish:

- Electrical safety management principles
- Approach to compliance remedial work

- Record keeping
- Competent persons
- Training
- Audit procedure
- Non-compliance
- Electrical Safety Information

6. Policy Statement

The Housing Division will ensure that all electrical installations, including any fire alarm systems and hardwired smoke and carbon monoxide (CO) alarms shall be in a satisfactory condition following completion of an electrical installation inspection and test.

We will ensure that only suitably competent NICEIC electrical contractors and engineers (or equivalent) undertake electrical works for the organisation.

We will require an electrical installation inspection and request a Minor Electrical Works Certificate (MEW) when completing planned component replacement works within domestic properties.

We will have a process in place to gain legal access should any tenant refuse access to carry out essential electrical safety related inspection and remediation works, taking into consideration our residents' vulnerabilities. Our tenancy and lease agreements enable us to obtain access for these purposes.

We will ensure that processes and controls are in place to manage the completion of follow up works identified during inspection and testing of electrical installations.

Where appropriate any compliance risks will be considered, mitigated, or removed as part of any major refurbishment works or included in new development design briefs.

We will ensure our contractors will provide a risk assessment for electrical safety management and operations. This risk assessment will set out the contractors' key electrical safety risks together with appropriate means of mitigation.

7. Key Roles and Responsibilities

The Assistant Director of Housing Management will have overall operational 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 Assistant Director of Housing Management will review this policy periodically. The policy will be reviewed every three years (or sooner if there is a change in regulation, legislation, or codes of practice).

The Assistant Director of Housing Management will receive quarterly 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.

The Housing Division will produce at least quarterly reports in respect of electrical safety management performance and ensure compliance is being achieved.

8. Appointed Duty Holder

The Housing Compliance Manager will fulfil the role of appointed 'Duty Holder' on behalf of the Housing Division to ensure the appropriate management of the risks associated with electrical safety. As a result, the Housing Compliance Manager will hold responsibility for the implementation of this document, and supporting Electrical Safety Procedure, as well as ensuring compliance is achieved and maintained.

Although the organisation has an appointed Duty Holder, the Assistant Director of Housing Management will be responsible for ensuring compliance with current legislation, ensuring that the organisation fulfils its duties and responsibilities as outlined in this policy document and the supporting procedures.

9. Responsible Persons

The Head of Major Works shall ensure that there are suitable arrangements in place for the delivery of the Electrical Safety programme and the implementation of the Electrical Procedure. This includes the prioritisation and implementation of any works arising from the electrical safety inspections.

The Area Managers will provide key support in gaining access to properties where access is proving difficult and use standard methods to do so. They will also facilitate the legal process to gain access, as necessary.

10. Competent Persons

Any contractor undertaking electrical installation work must be registered through the National Inspection Council for Electrical Installation Contractors (NICEIC) the Electrical Contractors Association (ECA), National Association for Professional Inspections (NAPIT) or other accredited body. Individual engineers working on electrical installations must be trained, competent and hold a relevant industry recognised qualification.

11. Obligations

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

- Safe when a tenancy begins
- Maintained in a safe condition throughout the tenancy,

To be compliant under these duties electrical installations are required to be periodically inspected and tested. The intervals between inspections are not fixed in law, however, best practice guidance from the Electrical Safety Council and from BS7671:2018 states that electrical installations should be checked 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.

All electrical installations will be inspected and checked prior to the commencement of any new schemes and a satisfactory Electrical Installation Condition Report (EICR) should be issued to City of London upon request.

The Electricity at Work Regulations 1989 place 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.

The Electrical Equipment (Safety) Regulations 2016 require 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 annual portable appliance testing (PAT) programme.

We will hold accurate and up to date records and certificates against each property we own or manage, identifying when the electrical installation was last inspected and tested and when re-inspections are due.

12. Compliance remedial works

The Housing Division 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 or electrical portable appliance.

We will as a minimum make safe and/or where 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 1 and 2 defects will be completed within 10 working days (except where a rewire is required) and an EICR will be issued stating that the installation is in a satisfactory condition.

We will establish and implement programmes of electrical installation upgrading works to improve electrical installations, that have been identified as not meeting current standards but are in a satisfactory condition for the purposes of an EICR, up to a standard that meets all current requirements of BS7671.

We will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued regarding electrical safety.

13. Contract Management

On at least an annual basis all qualifications, competencies and KPI's will be reviewed for all areas of work contractors undertake on our behalf. We will ensure that all external contractors are provided with up-to-date information relating to all relevant compliance areas.

14. Record Keeping

City of London will establish and maintain accurate and up to date records of all completed EICRs, Minor Electrical Works Certificates (MEW) and smoke/heat/CO 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 EHA's Data Retention Policy.

City of London will ensure processes and controls are in place to provide and maintain appropriate levels of security for all electrical safety related data.

15. Training

City of London will ensure that all operatives working for, or on behalf of them have the relevant training required for their role. Property Services Officers will undertake periodic assessments of training needs and resulting programmes of internal and/or external training will be implemented.

All relevant staff will understand electrical safety and their roles and responsibilities in ensuring that we maintain full compliance.

16. Performance Reporting

Key performance indicator (KPI) measures will be established and maintained to ensure City of London is able to report on performance in relation to electrical safety. KPI measures will be produced and provided to Senior Management on a monthly basis and to Committee at agreed intervals. As a minimum, these KPI measures will include reporting on the total number of:

- No. of blocks requiring EICR certificate
- No. of blocks with valid EICR certificate
- Proportion of blocks with a valid EICR certificate (%)
- Homes requiring an EICR certificate
- Homes with a valid EICR certificate
- Proportion of homes with a valid EICR certificate (%)
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Narrative - an explanation of the:

- Current position;
- Corrective action required, if any; anticipated impact of any corrective action;
- Completion of follow-up/remedial works
- Properties which are due to be inspected and tested within the next 30 days.

We may carry out an independent audit of electrical safety periodically. This audit will specifically test for compliance with regulation, legislation and codes of practice and identify any non-compliance issues for correction. It will also look at and test processes to ensure that they are being adhered to and are still fit for purpose.

17. Non-Compliance / Escalation Process

Any non-compliance issue identified at an operational level will be formally reported to the Compliance Manager in the first instance.

The Compliance Manager will agree an appropriate course of corrective action with the operational team to address the non-compliance issue and report details of the same to the Housing Management Team. The Housing Management Senior Leadership Team will consider the implications and take action as appropriate.

18. Communication

The Housing Division considers effective communication essential in the safe delivery of electrical safety management and will therefore ensure that relevant information is provided to residents.

19. Related documents

- Estate Management Policy
- Health and Safety Policy (Corporate)
- Fire Safety Policy
- Gas Safety Policy
- Housing Strategy
- Housing Asset Management Strategy
- Repairs & Maintenance Policy

20. Equalities

This Policy has been subject to an equalities test of relevance and will be implemented in accordance with our responsibilities and duties under relevant legislation, including the Equalities Act 2010.

21. Data Protection

We will comply with our obligations under relevant data protection legislation and regulations. We will process and store personal information securely.

22. Exceptions

We may make an exception to the approach outlined in this policy if the circumstances require it and it is reasonable to do so. Our reasoning can be provided to the affected parties on request.

Department of Community & Children's Services

Housing Service



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