

# ELECTRICAL SAFETY POLICY

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<b>Executive Summary:</b>
<p>This policy sets out our legal and regulatory duties in respect of electrical safety and what we will do to ensure we comply with them. The policy includes details of the safety inspection / check programmes we will operate to achieve this, and the measures we will take to ensure the programmes are delivered safely and in a timely manner. It also sets out how we will monitor delivery of the policy and of the programmes.</p>

<b>Policy Grouping/Directorate</b>	Property Compliance / Property Services	
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<b>Notes:</b>		

## **1 Introduction and Aims**

- 1.1 As a landlord, RBH is responsible for the maintenance and repairs to our homes, communal blocks and other properties we own and manage, all of which will contain electrical installations, equipment and portable appliances.
- 1.2 The key objective of this policy is to ensure our Senior and Executive Leadership Teams, colleagues, partners and customers are clear on our legal and regulatory electrical safety obligations and what we will do to comply with them. This policy provides the framework our colleagues and partners will operate within to meet these obligations.
- 1.3 The aims of the policy are:
  - To ensure that RBH has identified and complied with all relevant legal duties in respect of electrical safety.
  - To ensure that RBH is meeting our regulatory duties in respect of electrical safety.
  - To help deliver our objectives within our Corporate Strategy to ensure our customers live in safe homes and that we are delivering customer focused services which meet their needs.
- 1.4 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst colleagues and contractors and it will be shared with all relevant RBH colleagues and partners.

## **2 Context**

- 2.1 The Housing Act 2004 requires that properties are free from Category 1 HHSRS hazards; this includes electrical hazards.
- 2.2 The Landlord and Tenant Act 1985 and the Homes (Fitness for Human Habitation) Act 2018 place 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 so the property is fit for habitation.
- 2.3 To comply with these duties, electrical installations should be periodically inspected and tested. There is no legal requirement setting out how frequently we must carry out inspections and tests in domestic properties.
- 2.4 Best practice guidance within the current version of BS7671:2018 recommends that electrical installations are tested at intervals of no longer than five years from the previous inspection. This guidance also states that any deviation from a five-year interval should be at the recommendation of a competent person, and should be backed up by sound evidence to support the recommendation.
- 2.5 All electrical installations should be inspected and tested prior to the commencement of any new tenancies. This means that tests should be carried out whilst properties are void and when mutual exchanges and transfers take place, and a satisfactory Electrical Installation Condition Report (EICR) should be issued to the customer upon moving in.

- 2.6 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.
- 2.7 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.
- 2.8 This policy will support RBH to comply with the following regulatory standard:

### **Consumer Standards – Safety and Quality Standard**

The delivery of this policy will support us to comply with the requirement to take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas. This policy has identified the legal requirements that relate to electrical safety, and sets out what we will do to comply with them.

## **3 Values**

- 3.1 The policy fits with all the mutual values of RBH:

**Putting People First:** We listen with empathy, respond with compassion, and make it easy for our customers to access our services. We will respond to requests from customers about electrical safety within their home, and be empathetic to any concerns.

**Doing What We Say:** We earn trust through honesty, integrity, caring and keeping our promises.

**Working As One:** We embrace our mutuality and work together to deliver great outcomes for the people living in our homes and communities.

**Delivering Quality:** We invest wisely in our people and make it easy for them to deliver services and create places that our customers are proud to call home.

**Open & Transparent:** We are curious, embrace diverse ways of thinking and seek feedback to help us improve.

## **4 Policy Statement**

- 4.1 We acknowledge and accept our electrical safety responsibilities as outlined in section 2.
- 4.2 We will maintain a core asset register of all properties we own and/or manage, with component/attribute data against each property to show electrical inspection requirements.
- 4.3 We will operate a robust process to manage all changes to our assets, including property acquisitions and disposals, to ensure that properties are not omitted from electrical inspection safety programmes and the programme remains up to date.

### ***Electrical safety programme***

- 4.4 We will operate a programme of five yearly electrical installation inspections and tests (unless the competent person recommends an earlier next test date) to all properties and assets which have an electrical supply. We will carry out these inspections and tests to all domestic properties, communal blocks and other properties.

- 4.5 **New builds and properties which have rewires** – All new build properties, and all properties which have a rewire, will receive their first electrical installation inspection and test ten years after the date of installation, and every five years thereafter.
- 4.6 We will ensure that all electrical installations are in a satisfactory condition following the completion of an electrical installation inspection and test and will require the production of a condition report or other certificate which confirms that the installation is safe.
- 4.7 We will endeavour to repair at the time of the electrical inspection all Code 1 (C1 – urgent danger) and Code 2 (C2 - danger) defects identified, to produce a satisfactory EICR. Where this is not possible, we will make the installation safe and return to complete the required remediation works within 28 days and ensure a satisfactory EICR is produced.
- 4.8 Further Investigations (FIs) recorded on the EICR will be investigated within 28 days of the date on which the inspection and test was carried out. Any C1 or C2 faults identified as a result of these will be rectified within 28 days.
- 4.9 Where any C1 and C2 defects have been repaired, they will be recorded on the satisfactory EICR to provide an audit of the work completed.
- 4.10 We will review all Code 3 (C3 – non-critical improvements) and observations and determine the most appropriate course of action, and implement any actions we deem to be necessary.
- 4.11 We will ensure there is a robust process in place for the management of any follow-up works required following the completion of an electrical inspection (where the work cannot be completed at the time of the inspection).
- 4.12 We will ensure that a full electrical installation inspection and test is undertaken in the case of a change of occupancy (void properties, mutual exchanges and transfers), and when completing planned works within domestic properties; this will be evidenced through a satisfactory EICR or other report.
- 4.13 We will operate measures to identify, manage and/or mitigate risks related to portable electrical appliances in the properties and assets we are responsible for, or which we issue to colleagues as part of their work.
- 4.14 We will carry out a programme of checks to lightning protection, where it is installed, at least every 12 months.
- 4.15 We will carry out a safety check of electrical heating systems every five years, as part of the periodic electrical inspection and testing programme.
- 4.16 We will install, test and replace (as required) battery operated and/or hard-wired smoke alarms and carbon monoxide detectors as part of the electrical inspection. We will also do an annual check, either as part of the gas safety check or a separate visit if the property does not have a gas supply. We will also undertake this check when a property is void.
- 4.17 We will operate a robust process for the management of immediately dangerous situations identified from the electrical inspection.

- 4.18 We will operate a robust process if there is difficulty gaining access to a property to carry out the electrical inspection or any required remediation works. We will use the legal remedies available within the terms of the tenancy agreement, lease or license following a minimum of three attempts at gaining access. We will also work with other statutory agencies to support our attempts to gain access. Where customer vulnerability issues are known or identified, we will take steps to ensure we safeguard the wellbeing of the customer.
- 4.19 We will operate effective contract management arrangements with any contractors who support the delivery of the electrical inspection programme and who carry out work on electrical installations in our homes and other assets. This will include ensuring contracts/service level agreements are in place, conducting client-led performance meetings, and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 4.20 **Properties managed by others** – Where our properties are managed by others and we do not have the repairing obligation, we will require them to provide copies of valid and in date EICRs to us. If the third party does not provide the EICR, we will carry out the safety inspection and re-charge them for the cost of this work.
- 4.21 **Leasehold properties** – We will remind leaseholders of their obligations to keep their electrical installation in good repair and to carry out regular checks, and will provide advice about how they can do this. We will risk operate a risk-based approach to electrical safety in leasehold properties, and will request evidence that the electrical installation is safe in our high risk buildings and in any other buildings or from customers which we identify as being higher risk. If the leaseholder does not provide this evidence upon request, we will determine the appropriate action to address this which may include carry out the safety inspection and re-charge them for the cost of this work.

### ***Managing risk***

- 4.22 We will establish and maintain a risk assessment for electrical safety management and operations, setting out our key electrical safety risks and appropriate mitigations.
- 4.23 We will operate a process for identifying and managing customers who are at risk and support our attempts to gain access, including mitigation plans to manage any specific risks identified.
- 4.24 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) a Construction Phase Plan will be in place in respect of all repairs to void and tenanted properties (at the start of the contract and reviewed/updated annually thereafter), component replacement works and refurbishment projects.
- 4.25 We will operate a robust process to investigate and manage any **RIDDOR notifications** submitted to the HSE in relation to electrical safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.
- 4.26 We will operate a robust process for **dealing with and escalating any significant non-compliance**. Our definition of significant non-compliance is: any incident which has

the potential to result in a material breach of legislation or regulatory standard, or which causes a risk to health or safety.

- All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of an RBH employee becoming aware of it.
- Any non-compliance issue identified at an operational level will be formally reported to either the relevant Service Manager or Head of Service in the first instance, who will agree an appropriate course of corrective action with the Director of Property Services. The Director of Property Services will report details of the same to the Executive Leadership Team.
- In cases of serious non-compliance, the Executive Leadership Team will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive. In such instances, the issue will also be reported to Board.

The issue will also be recorded and investigated in accordance with the RBH accident and near miss reporting process.

### ***Training and competency***

4.27 We will ensure that **suitably competent and trained people** will carry out safety checks and undertake work on electrical installations:

- Only suitably competent electrical contractors and operatives, who are registered with an approved competent body (for example the NICEIC, British Standards Institution, ELECSA, BRE Certification or NAPIT Registration) will undertake electrical works on our behalf.
- Only suitably competent third-party technical auditors, who are registered with approved competent body (for example the NICEIC, British Standards Institution, ELECSA, BRE Certification or NAPIT Registration), will undertake quality assurance checks.

4.28 We will check our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor's certification appropriately.

4.29 We will deliver **training** on this policy and the procedures that support it, through appropriate methods including: team briefings; basic electrical safety awareness training; and on the job training for those delivering the programme of electrical inspections, planned maintenance and repair works as part of their daily job. All training undertaken by RBH colleagues will be formally recorded.

### ***Customer communications***

4.30 We consider good communication essential in the effective delivery of electrical safety programmes, therefore we will establish a customer engagement strategy and communication programme to support customers in their understanding of electrical safety. This will include writing and/or texting them in advance of safety checks, taking account of any specific customer communication requirements. This will assist us in maximising access to carry out electrical inspections, encourage and support customers to report any concerns about electrical safety, and help us to engage with vulnerable and hard to reach customers. We will share information clearly and transparently and will ensure that information is available to customers via regular

publications and information on our website via regular publications and information on our website via regular publications and information on our website.

## 5 Monitoring

5.1 We will hold electrical inspection dates and records/certificates against each property we own or manage, with details of the following:

- Inspection dates
- Electrical Installation Condition Reports (EICRs)
- Minor Electrical Works Certificates and Building Regulation Part P notifications associated with remedial works
- Electrical Installation Certificates

5.3 We will ensure there is a programme of third-party quality assurance audits of electrical inspections and safety checks. This will cover new installations (or those which have had upgrades which require a new EICR or other certificate), sample of field checks and electrical safety certificates. Sampling will be risk-based, taking into account the property type and the engineer who carried out the inspection. The minimum sample size will be 5%.

5.4 Internally we will undertake 100 per cent desktop audits of all EICRs/certificates.

5.5 We will keep all completed safety check records and remedial work records for at least two inspection cycles (always holding at least three inspection records), and in accordance with our document retention policy. We will have robust processes and controls in place to maintain appropriate levels of security for all electrical safety related data and records.

5.6 We will hold data and monitor performance against the following:

Data – the total number of:

- Properties – split by category (domestic, communal and others);
- Properties on the electrical inspection and testing programme;
- Properties not on the electrical inspection and testing programme;
- Properties with a valid and in date EICR/certificate;
- Properties without a valid and in date EICR/certificate;
- Properties due to be inspected within the next 30 days; and
- Completed, in-time and overdue follow-up works/actions arising from the programme.

Narrative - an explanation of the:

- Current position;
- Corrective action required;
- Anticipated impact of corrective actions; and
- Progress with completion of follow-up works.

5.7 We will also monitor the number of RIDDOR notifications to the HSE about electrical safety and the actions take, through our Health and Safety Committee and report on this to Board.

5.8 We will report key performance indicator (KPI) data for electrical safety to our Executive Leadership Team (ELT) on a monthly basis, and to the Customer Service Committee on

a quarterly basis. We will also report any non-compliance to Board on an exception basis, in accordance with our performance monitoring and KPI framework. We will report our performance to customers in our annual report, and through our website and other communication channels throughout the year.

- 5.9 We will carry out an internal or independent audit of electrical safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

## **6 Review**

- 6.1 All RBH strategies, policies, service standards and procedures are reviewed on a regular basis to ensure that they are 'fit for purpose' and comply with all relevant legislation and statutory regulations.
- 6.2 This policy will go through the full policy approval process every 3 years and will undergo a desktop review annually. This is to ensure that it is fit for purpose and complies with all relevant and statutory regulations.

## **7 Links with Other RBH Documents**

- 7.1 This policy links to the following policies and strategies:
- Homes and Communities Strategy
  - Gas/Heating Safety Policy
  - Fire Safety Policy
  - Asbestos Safety Policy
  - Lift Safety Policy
  - Construction Design and Management (CDM) Policy
  - Disrepair Policy
  - Responsive Repairs Policy

## **8 Inclusivity statement**

- 8.1 We are dedicated to fostering an inclusive and equitable environment for all. We ensure that everyone is valued and respected. Our policies aim to be inclusive, and will comply with UK laws, including the Equality Act 2010, to create a diverse and supportive environment for people to thrive.
- 8.2 We understand not everyone absorbs information the same way. If you have any difficulty understanding or interpreting this document please email [people@rbh.org.uk](mailto:people@rbh.org.uk) or call Freephone 0800 027 7769. We will work with you to ensure your individual needs are met.