

Electrical Safety Policy

DESIGN HEADER TO INCLUDE POLICY NAME AND DATE RANGE

INFORMATION

Policy Name	Electrical Safety Policy
Effective Date(s)	26th May 2022
Approved By	R&C, CSC, Group Board
Approval Date	26th May 2022
Policy Owner/Dept	Kate Meredith/Compliance
Policy Author	Kate Meredith – Head of Compliance
Review Date	May 2024
Version Number	3

Version Control

Version	Date	Changes	Approver
1	20/12/2016	Changes to Incident Management System - Datix	I Hardman
2	20/10/2020	Data Protection Act Updated	A Hudson
3	Feb-21	Minor changes to reflect working practices.	Risk & Compliance

Your Housing Group Strategic Priorities			
Safe	<input checked="" type="checkbox"/>	Viability	<input type="checkbox"/>
Landlord	<input checked="" type="checkbox"/>	Growth	<input type="checkbox"/>
People	<input type="checkbox"/>	Technology	<input type="checkbox"/>

Relevant National Standards or Regulation	<ul style="list-style-type: none"> • Home Standard. • Tenancy Standard. • Neighbourhood and Community Standard. • Tenant Involvement and Empowerment Standard.
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Relevant Legislation & Guidance	<ul style="list-style-type: none"> • Management of Health & Safety at Work Regulations 2006. • Health & Safety at Work Act 1974. • Housing Act 2004. • Housing Health and Safety Rating System (HHSRS). • Electricity at Work Regulations 1989. • Electrical Installation Regulations BS 7671 (as amended) 2018. • IET Guidance Notes - 18th Edition. • BS:7671:2018 Requirements for Electrical Installations.
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1. Purpose of the Policy

This policy details YHG's approach to managing electrical safety and maintaining fixed, and where applicable, portable, electrical installations.

The policy will establish the actions YHG will take to deliver a periodic electrical inspection regime in line with the recommendations set out in *BS:7671:2018 Requirements for Electrical Installations* (the British Standard) and the *IET Guidance Notes 3: Inspection and Testing* (the Guidance Notes). It will also outline YHG's approach to undertaking Portable Appliance Testing (PAT) in line with *IET Code of Practice for In-service Inspection and Testing of Electrical Equipment* and also maintenance of Lightning Protection Systems (LPS) in accordance with *British Standard 6305*.

This policy aims to demonstrate that YHG takes all reasonable and practical steps to eliminate, minimise and manage risks of electrical hazards to its customer and properties and to ensure that YHG meets all its obligations in respect of electrical safety, in particular with regards to the British Standard and the Guidance Notes.

2. Scope of the Policy

This policy is applicable to all fixed electrical installations within all buildings and properties that YHG has a defined maintenance and repair responsibility for. This includes residential dwellings, common areas of houses of multiple occupation, specialised housing such as sheltered, retirement living, extra care, supported housing and offices.

In addition the policy will outline YHG's approach to undertaking Portable Appliance Testing (PAT) on appliances provided by YHG for use employees, customers and visitors. It will also outline YHG's requirements to maintain Lightning Protection Systems (LPS).

Where buildings and properties are managed by third parties (e.g., Agency Managed Supported Schemes, PFI Schemes) the maintenance of the fixed electrical installations, appliances and LPSs will fall under the scope of this policy so far as the YHG responsibilities detailed in the terms of the management agreement.

3. Definitions

Periodic Electrical Inspection – an inspection of the condition of an existing electrical installation, to identify any deficiencies against the current national standard for electrical installations.

Portable Appliance Testing (PAT) – the process of checking electrical appliances for safety through a series of visual inspections and electronic tests.

Lightning Protection Systems (LPS) – a system of external earthing and internal surge protection designed to prevent lightning strike damage to buildings.

Electrical Installation Condition Report (EICR) – a formal document produced following a periodic electrical inspection which evidences the condition of the electrical installation.

Electrical Installation Certificate (EIC) – a safety certificate issued to confirm that a new electrical installation or addition is safe to use at the time it was put into service.

National Inspection Council Electrical Installation Contractors (NICEIC) – a voluntary body that regulates the training and works of electrical contractors and organisations across the UK.

4. Consultation

Consultation has taken place with the following. Their feedback has been considered and the policy update:

- Engagement Focus Group,
- Equality Impact Assessors Group,
- Customer Connect Panel,
- Director of Asset & Building Safety,
- Director of Housing & Customer Service.

5. Background and Context

Fixed electrical installations should be regularly tested and inspected as they can deteriorate due to a number of factors such as damage, wear, tear, corrosion, excessive loading, aging and environmental issues. There may also be incidences of unauthorised electrical alteration being carried out by, or on behalf of the customer. Unsatisfactory electrical installations could lead to hazards such as fire and electrical shock. They should therefore be tested and inspected at regular intervals to check whether they remain in satisfactory condition for continued use.

In order to manage the risks resulting from the exposure to unsafe electrical installations and equipment Landlords should implement and maintain a periodic fixed electrical installation inspection regime which results in the issue of an Electrical Installation Condition Report (EICR).

YHG's duties in relation to the completion of EICRs include:

- The frequency of testing should be in line with British Standard and the Guidance Notes, which states that the maximum period between testing should be no longer than 5 years and for domestic dwellings should also be carried out at every change of occupancy.
- To have robust processes in place to ensure a full and accurate record of all electrical installations requiring testing, together with the last test date and next test due date.
- Where completion of an EICR requires access to a customer's home, YHG should have a formal access procedure in place that is followed to gain access, evidencing that all reasonable and practical steps have been made to complete the test.

- Upon completion of a fixed electrical installation test an EICR should be produced as evidence of the inspection and to confirm that the installation is in Satisfactory condition. The EICR should state the testing electricians' recommendation as to when the installation should be next inspected, up to an interval of no more than 5 years. They should make this decision based on their assessment of the overall condition of the electrical installation.
- In some instances, the electrician may identify defects with electrical installation. Defects should be classified by the electrician as one of the following and they will detail within the EICR their recommended rectification:
 - Classification code C1 - Danger present. Risk of injury. Immediate remedial action required. EICR will state that the installation is Unsatisfactory.
 - Classification code C2 - Potentially dangerous. - Urgent remedial action required - EICR will state the installation to be Unsatisfactory.
 - Classification code C3 - Improvement required. - EICR will state the installation to be Satisfactory.
- YHG should have documented procedures as to how each classification of defect will be managed. These procedures should also detail the requirements for the re-issue of testing paperwork following completion of rectification works, including those instances where a partial or full new installation is required. YHG should also ensure complete and accurate evidence is retained of testing and of any remedial works carried out.
- Electrical testing and remedial works should only be carried out by suitably qualified and competent electricians. YHG should ensure there are processes in place to verify that only appropriately qualified and accredited electricians and businesses are carrying out works to their properties. This should be supported by a framework of ongoing quality assurance and performance management arrangements.

In addition to managing the risk of fixed electrical installations YHG should also consider the risk from “portable” appliances such as white good and ICT equipment. The IET Code of Practice for In-service Inspection and Testing of Electrical Equipment provides guidance on the approach to PAT.

Some YHG buildings will be installed with a Lightning Protection System and where these are present there is a requirement for them to be maintained in accordance with BS EN 6305.

6. Policy Detail

The following section details the actions taken and measures that are in place to ensure fixed and portable electrical installations are appropriately tested and maintained.

These actions and measures demonstrate YHG's commitment to ensuring a safe environment within which our customers can live and within which our staff can work, as well as satisfying our obligations under British Standards industry guidance.

The Electrical Safety Policy will be supported by an Electrical Safety Procedure.

Access Procedure

Access to properties for the completion of an EICR will be managed in line with a documented access procedure, with access attempts starting approx. 10 weeks ahead of the EICR expiry date to ensure that all reasonable and practical efforts have been made to complete the test before the expiration date, with a full and detailed audit trail maintained.

Access efforts will include appointment letters, phone calls and property visits by the contractor and their Tenant Liaison Officer, with further support from Housing Management if required. The procedure should allow sufficient flexibility to accommodate customer requests and circumstances.

The access procedure will largely mirror the gas access procedure however currently YHG will not take formal action to gain access (e.g. injunction application, or entry via clause 11.2 of the tenancy agreement) as is done with Annual Gas Safety Checks.

For those buildings where an EICR is required to be carried out to the electrical installation within the communal areas access is not required to individual properties however orders will be issued to contractor to allow sufficient time for the completion of the EICR ahead of the certificate expiry date, with support from the Compliance Team and on-site staff to ensure access is gained to all necessary areas.

Defects

Where a test deems that the electrical installation is not satisfactory then timely action should be taken to bring the installation up to a satisfactory standard, with every effort made to ensure all necessary work is completed before the current EICR expiry date.

Testing defects will be classified by the electrician as one of three classifications and YHG will instruct contractors to manage defects as per below:

- **Classification code C1:** *Danger present/ Risk of injury* - Immediate remedial action should be undertaken to rectify the defect at the time of the inspection. If it is not possible for the electrician to complete the work and deem the electrical installation to be in a safe condition, the electrician should seek to isolate the parts of any circuit, which is deemed unsafe and report the findings to YHG immediately.
- **Classification code C2** - *Potentially dangerous*. - Urgent remedial action should be undertaken. Where possible this will be done at the time of the inspection however if this is not possible the contractor should ensure the work is completed within 7 days.

- **Classification code C3 - Improvement required.** – These pose no risk to the electrical installation but are improvements that could be made to bring the installation in line with current standards. YHG will specify certain code 3 faults that the contractor should address within 20 days of the test, all others will be considered as part of future electrical upgrade programmes.

Where any further works are required by the contractor to address code 1, 2 or 3 faults these should be carried out before the EICR is issued to YHG so that the EICR issued states the installation to be Satisfactory.

Smoke, Heat and CO Alarms

YHG will, at the same time as the undertaking of the EICR, ensure that a check is made of any installed Smoke, Heat and Carbon Monoxide (CO) alarms. The electrician will test that each appliance is sounding and working in line with manufacturer's instructions and industry best practise.

The engineer will replace any existing defective alarms with a battery-operated replacement.

In line with expected amendments to the Smoke and Carbon Monoxide Alarm (England) Regulations 2015, YHG is working to ensure all properties have an installed smoke alarm and where there are fixed gas appliances a CO alarm.

Portable Appliance Testing

YHG is not responsible for the maintenance of electrical appliances unless the appliance has been supplied by YHG, e.g. YHG is not responsible for appliances within homes that have been purchased by the customer. YHG does however have a responsibility for electrical appliances issued or used by staff, e.g. laptops, monitors, mobile phone charges and also electrical appliances within communal areas that may be used by staff or customers, e.g. audio equipment and white goods such as kettles and microwaves. YHG may also have some instances where appliances have been supplied within domestic dwellings, e.g. integral white goods installed in a new development, and YHG retain responsibility.

Where YHG is responsible for electrical appliances a PAT will be carried out in line with IET Code of Practice for In-service Inspection and Testing of Electrical Equipment guidance. The frequency of testing should be determined based on a risk assessment which considers how often equipment is used, who is using it and the environment it is used in. Currently YHG carry out a PAT to all applicable appliances either yearly or bi annually however will work towards reviewing this and ensuring evidence of risk based approach.

Lightning Protection Systems

Where LPS are installed to buildings that YHG has a maintenance and repair responsibility an annual safety inspection will be carried out by lightning specialist and in line with BS EN 62305. Most YHG buildings with LPS will have had the system installed as part of the

build having given consideration to the size and height of the building and the environment, e.g. frequency of lighting strikes in the area. There may be occasions where YHG are guided to install a LPS to an existing building following a Fire Risk Assessment.

Asset Data & Reconciliation

YHG is required to ensure a valid certification is in place for all fixed electrical installations and portable appliance within all buildings and properties that it has a defined maintenance and repair responsibility for.

YHG will hold and maintain an accurate record within the Orchard Housing Management System of all buildings and properties that require an EICR, PAT, LPS safety inspection, together with the last test, testing frequency (as recommended by the last testing engineer) and the next due date.

Processes will be in place to ensure testing schedules are updated to reflect any property divestments, acquisitions (including new builds) and any changes to maintenance and repair responsibility.

In addition, on an annual basis a full EICR property reconciliation will be carried out. This will reconcile the information within Orchard against Keystone Asset Management System to ensure all applicable building and properties remain captured in the EICR schedule.

As part of this reconciliation process YHG will work toward ensuring that where the responsibility for electrical safety to a third party (e.g., Agency Managed Supported Scheme, PFI Schemes) action is taken to ensure evidence is obtained that all necessary electrical tests have been undertaken.

Certification & Documentation

Upon completion of an inspection and test, YHG will obtain from the contractor the EICR, PAT record or LPS safety certificate, which will be then used to update Orchard with the testing date and also the next test due.

For EICRs the next test due date will be as per the testing electrician's stated recommendation on the EICR as to when the installation should be next inspected, up to an interval of no more than 5 years.

In addition to the scheduled regime, an EICR will be completed as part of the void works before any property is re-let . The contractor carrying out the test will ensure a copy of the EICR is issued to the Compliance Team so that the EICR details in Orchard can be updated accordingly.

If any properties require adding to the testing schedule, evidence of a current valid EICR or in the case of new developments an Electrical Installation Certificate (EIC), must be obtained.

YHG will only accept EICRs that are stated as "Satisfactory". If a test is carried out and defects deem the installation to be "Unsatisfactory" all necessary remedial works should

be carried out before the EICR is issued to YHG so that the EICR issued states the installation to be Satisfactory. YHG will not accept “Unsatisfactory” EICRs supported by a minor works certificate. In the case of an EIC, these will be accepted as an inspection record if either the full installation has been replaced or if only a partial replacement has taken place, all remaining elements of the installation have been tested.

Before issue to YHG all EICRs (and EICs) must be reviewed and signed by the contractors Electrical Qualifying Supervisor.

For added assurance a percentage desktop audit will also be carried by the Compliance Contract Manager. All gas certification is checked/validated by YHG’s Document Reader System – CDMS. YHG will look towards developing this system further to allow for the checking and validation of EICRs.

All EICRs (and EICs), EICR, PAT records and LPS safety certificates will be saved against the property/building within Documotive.

Contractor Competence, Quality Control and Performance

YHG must be able to satisfy themselves that all those carrying out electrical testing within its buildings and properties are competent to do so.

All contractors procured to undertake electrical testing must be accredited with The National Inspection Council Electrical Installation Contractors (NICEIC). The electricians undertaking the testing on behalf of YHG will as a minimum hold the following qualifications:

- NVQ level 3 Electrical Installation or recognised equivalent.
- City & Guilds 2382-18 Level 3 Award in Requirements for Electrical Installations BS7671:2018.
- City & Guilds 2391 or 2394 & 2395 Inspection and testing.

The Compliance Team will maintain a register of all electrical contractors and electricians carrying out testing works for YHG. This will include the specific qualifications of the electricians and if applicable the expiration date. Processes will be in place to ensure that the register is kept up to date, e.g., new electricians are added, and that evidenced is obtained of any renewed/updated qualifications.

The performance of electrical testing contractors will be managed by the Compliance Contract Managers, supported by a suite of internal metrics and KPI dashboards. Monthly Operational Meetings are held with Contractors within which performance is discussed and documented, with procedures in place to take more formal action to address performance issues if required.

To support performance management and to provide assurance on the quality and safety of work YHG will work towards employing a Quality Assurance consultant to carry out a percentage audit of completed EICRs. The Quality Assessors will provide technical and corrective advice as well as monthly reporting and trend analysis to YHG regarding the performance of the contractor and its electricians. It is envisaged that YHG will

commission a 5% assurance check, with the opportunity to increase if the factual evidence points towards a lack of reputable workmanship being undertaken.

7. Responsibilities under this Policy

The roles and responsibilities for key stakeholders across YHG is detailed below.

Note - these are the roles and responsibilities in specific relation to the delivery of this policy only. The Electrical Safety Procedure will provide further details on the roles and responsibilities of all staff with day-to-day responsibility for electrical safety.

- **Chief Executive** will need to ensure that resources are made available to allow the actions and measures detailed in this policy and any associated procedures to be effectively delivered. They will discharge their responsibilities for the for the delivery of services in line with policy and procedures to the Director of Asset and Building Safety and Head of Compliance however will retain an oversight on progress/performance.
- **Board Members** will review reports and/or performance indicators that provide progress updates to ensure that YHG is meeting the requirements of its obligations under industry guidance and the policy measures.
- **Director of Asset and Building Safety** will work closely with the Head of Compliance to seek assurances that obligations under industry guidance and the policy measures are being adhered to and services are delivered in line with budget. They will carry out quarterly strategic performance reviews of contractors to ensure compliance with their contractual obligations.
- **Head of Compliance** is responsible and accountable for the overall implementation, and regular review, of this policy and ensuring its objective are achieved. They are also responsible for compliance performance reporting to the Director of Assets & Building Safety, Board and the Chief Executive. They will ensure that any compliance and/or H&S related issues are brought to the attention of the Director of Assets & Building Safety and provide regular updates on service delivery against budget.
- **Head of Housing/ Supported Housing/Older Persons Services** will ensure Housing Management staff's adherence to the access procedure, ensuring appropriate and timely action is taken to secure access to properties, ultimately maximising the number of properties accessed ahead of EICR expiry date.
- **Compliance Contract Manager (Electrical)** will be responsible for the day-to-day operational delivery of all electrical testing. They will effectively manage the performance of the service delivery contractors, including their ongoing competence,

and proactively monitor service delivery against targets. They will be responsible for monitoring the quality of work undertaken by the contractor and ensuring all certification is received and verified. They will act as the organisations technical lead for electrical safety, ensuring that YHG continue to work in line with the most up to date regulations and industry guidance.

8. Risk Management

The risks of not following this policy are that YHG will not comply with industry guidance and will fail to appropriately maintain electrical installations, leading to a potentially detrimental impact on the safety of customers and staff. This may result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974.
- Prosecution by the Local Authority under the Housing Act 2004.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.
- A judgement of serious detriment by the Regulator of Social Housing.
- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

9. Data Protection, Record Storage and Retention

All completed EICRs and EICs will be stored at a property or building specific level within Documotive.

EICRs and EIC will be retained for a minimum of 6 years.

Certification will include the full property address along with the current tenant's name. Access to Documotive is however login restricted.

A full audit trail of all EICR access attempts will be held in Orchard, including details of communication with the contractors and customer etc. Access to Orchard is however login restricted.

10. Equality and Diversity

This Policy will be applied in a way which ensures equality of treatment for all customers without discrimination, or victimisation on account of any protected characteristic as defined within the Equality Act 2010. In drafting this policy YHG has had regard to its public sector equality duties under s149 of the Equality Act 2010, namely the need to:

- eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Act.
- advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.

- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The policy pays regard to diversities around access to and delivery of any services.

On request YHG will provide translations of all its documents, policies and procedures in various languages and formats including computer disc, braille, large print, and tape.

An Equality Impact Assessment (EIA) has been undertaken on this policy and a copy is available upon request.

11. Communication

This policy will be communicated internally to staff via Youggle. Key stakeholders and key staff where this policy has specific impact will be briefed individually or collectively as required.

The policy will be shared with customers upon request, together with the access procedure if required.

YHG will work towards doing more to promote and raise awareness of electrical safety to customers, including an understanding of electrical safety issues and the importance of the EICR test.

12. Learning and Development

All staff with operational involvement with electrical testing will need to have and maintain suitable and sufficient system training, e.g., Orchard and Documotive.

The Compliance Contract Manager responsible for the day-to-day operational delivery of electrical testing and safety will be required to hold and retain a recognised electrical training qualification along with completing training in relation to any updates to the British Standard BS7671. They will also be expected to proactively maintain their Continued Professional Development to keep up to date and abreast of relevant industry and legislative changes. This will be in part achieved through membership and participation with the Association of Electrical Safety Managers (AESM)

13. Performance Management of this Policy

The completion of EICRs in communal areas in line with their due date forms part of the “Health & Safety – Customer’s Homes” balanced scorecard KPI. This is reported monthly to Board, ELT and SLT.

Update on progress on the domestic EICR programme is presented monthly to Risk & Compliance and quarterly to Customer Services Committee.

Several KPI dashboards are available and used to monitor the performance of the contractors in relation to electrical testing, including 1st time access rate and visits completed in line with the access procedure.

14. Review of this Policy

This policy will be reviewed every two years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Group wide policies.

The policy will be reviewed by the Head of Compliance.

Related Documents

Document Type	Name
Connected Policies and Procedures	
Forms and Letters	
Leaflets/Publicity Material	
Training Materials Available	
Intranet/ Website Page	

Checklist

(To be completed as far as possible by the Policy Author before submission for quality checking by Research and Policy Manager prior to Risk and Compliance Group)

Policy Name: Electrical Safety Policy	
Version No: 3	Effective Date: May 2022
Status: Full Review	
Previous Policy Name (where appropriate) Electrical Policy	
Brief Summary of Changes from Previous Version: Full review of structure and content to ensure in line with current legislation and working practices	
Internal Consultation Groups: Customer Scrutiny Panel Customer Connect Panel	Customer Consultation: <input checked="" type="checkbox"/>
	Date of Customer Consultation: 02/03/22 and 31/03/22
	Customer Consultation Brief Details: Explained the background/purpose of the policy, overview of policy content (with an emphasis on those elements most relevant to customers), policy aims and then opportunity for questions, comments and suggestions.
Link to Consultation Document(s):	
Date Initial Equality Impact Assessment Undertaken: n/a	Equality Impact Assessor name(s): Cate Hargreaves, Adele Duffy, Carly-Anne Greenall
Reason for Decision: Full review	
Date Full Equality Impact Assessment Undertaken: 23/03/22	
Brief Outline of any Changes Recommended from EIA: None	
Data Protection/ GDPR Implications: <input checked="" type="checkbox"/>	
Brief Outline of Data Protection/GDPR Implications: All completed EICRs and EICs will be stored at a property or building specific level within Documotive. EICRs and EIC will be retained for a minimum of 6 years. Certification will include the full property address along with the current tenant's name. Access to Documotive is however login restricted. A full audit trail of all EICR access attempts will be held in Orchard, including details of communication with the contractors and customer etc. Access to Orchard is however login restricted.	

Legal Implications: <input type="checkbox"/>	Legal Panel Consulted: <input type="checkbox"/>	Date:
Risk Implications: <input checked="" type="checkbox"/>	Risk Logged on Datix: <input type="checkbox"/>	Date:
Resource Implications	People: <input type="checkbox"/>	Finance: <input type="checkbox"/>
	Asset: <input type="checkbox"/>	Other: <input type="checkbox"/>
Brief Summary of how Resource Implications have been addressed:		
No resource implications, policy will be delivered in line with current budget and resources		
How will communication on this Policy take place: (please delete as appropriate)		
Intranet/ Email		
Policy Owner: (Department) Compliance	Policy Author: Kate Meredith	
Policy Signed Off by: Kate Meredith	Date: 31/03/22	
Policy Quality Checked by Research and Policy Manager: Vicki Maguire	Date: 31/03/22	
Policy Approved by: Risk and Compliance Group	Date: 12/04/22	
Policy Approved by: Group Board	Date: 26/05/22	