



homes, communities, cultures

# Electrical Safety Policy

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Version 2			
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## Contents

1. Background	3
2. Objectives of the Policy	3
3. Compliance with regulatory Standards and Legal Obligations	4
4. Scope	5
5. Monitoring	7
6. Policy Statement	8
7. Inclusive Services	11
8. Value for Money	13
9. Appendix 1 - Glossary of Terms	14
10. Appendix 2 - Current legislation applicable to this policy	15

## 1.0 Background

- 1.1 Connect Housing manages in the region of 3,000 tenanted properties. Fixed wire electrical installations within communal areas and the housing stock need to be maintained, as do portable appliances, automatic doors, gates and barriers and lightning protection systems.
- 1.2 This policy explains how Connect Housing's commitments to electrical safety will be met. It will be supported by an Electrical Safety Management Plan providing more detailed guidance and procedures.

## 2.0 Objectives of the Policy

- 2.1 As a Landlord and Employer, Connect Housing is responsible for meeting all its statutory obligations. In addition, as a Landlord and provider of Social Housing, it must meet the Regulatory Standards contained within Regulator of Social Housing [Regulatory Framework for Social Housing](#).
- 2.2 A key objective of this Policy is to describe how Connect Housing will meet the required statutory, contractual and regulatory requirements in relation to electrical safety.
- 2.3 In addition, Connect Housing must undertake a monitoring role to ensure that it is able to demonstrate a validated landlord compliance position, and in doing so, can provide assurance to other 3<sup>rd</sup> Parties that statutory and regulatory standards are being achieved.
- 2.4 **Further objectives of this policy are detailed below:**
  - Provide clear lines of responsibilities for the management of electrical safety.
  - Form part of Connect Housing's wider organisational commitment to health and safety as set out in its Health and Safety Policy.
  - To ensure that all persons involved with the installation, inspection and servicing of electrical systems and appliances are properly trained and accredited.
  - Provide a commitment to customers who are affected by electrical safety to communicate and raise awareness regarding the key issues.
  - Encourage customers, through the provision of publicity information, to allow access to carry out EICRs and remedial works which will contribute to their own safety.
  - Put in place quality assurance and performance management arrangements to ensure that we are delivering excellent services to our customers.
  - To provide a timetable for the review of the Electrical Safety Policy

- Provide a service that recognises the diversity of our customers as well as being inclusive and respectful.
  - To ensure Connect Housing provide a safe environment for customers, colleagues and third parties to live and/or work
- 2.5 This document will be stored on Connect Housing Intranet for internal stakeholders and will be available to be viewed by external stakeholders via their website.

## 3.0 Compliance with Regulatory Standards and Legal Obligations

- 3.1 The application of this policy ensures compliance with the regulatory framework for social housing in England, which requires all housing providers to ‘meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes’.
- 3.2 Connect Housing will comply with all current and relevant legislation and specifically as detailed in the following:

### Testing of Fixed Wiring Systems

- The Landlord and Tenant Act 1985
- Housing Act 1988
- Effective from 1<sup>st</sup> January 2019, the IET 18<sup>th</sup> Edition of the [Wiring Regulations 2018:BS7671](#) All domestic wiring installations must be designed, constructed, inspected, tested and certified to meet the requirements of the above standard.
- [The Electricity at Work Regulations 1989 \(EAWR\)](#) - persons must be competent to prevent danger and injury” where technical knowledge or experience is necessary to prevent danger

### Portable Appliance Testing

- [Section 2.2 of the Health & Safety at Work Act 1974 \(HSWA\)](#) requires employers as far as is reasonably practicable “to provide and maintain plant and systems of work that are safe and without risk to health. Plant covers any machinery, equipment or appliances including portable appliances.”

### Powered Doors, Gates and Barriers

- [Health and Safety at Work Act \(1974\)](#) places a duty to ensure the health and Safety of users, so far as is reasonably practicable
- [Supply of Machinery \(Safety\) Regulations 2008 as amended by the Supply of Machinery \(Safety\) \(Amendment\) Regulations 2011 and BSEN 12453:2001](#) sets out the requirements to maintained powered doors gates and barriers.

### Lightning Protection Systems

- [Section 7 and E7 of BS EN 62305:3:2011: 'Protection against Lightning – Physical damage to structures and life hazard' and its subsequent amendments](#) sets out the requirements for maintenance and inspections of lightning protection systems.
- 3.3 Connect Housing takes the view that delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985, will also be met.
- 3.4 It is essential to ensure customers, residents, employees and visitors remain safe in our premises (both individual homes and offices). Failure to properly discharge our legal responsibilities may result in:
- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
  - Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
  - Regulator of Social Housing serious detriment judgement
  - Reputational damage
  - Loss of confidence by stakeholders in the organisation

## 4.0 Scope

4.1 This policy relates to offices, general needs housing, supported housing, sheltered housing, other rented properties owned by Connect Housing and managed on their behalf by Connect Housing. It also covers communal areas including leaseholders/ shared ownership; other rented housing managed by Connect Housing on behalf of a third party; and remote plant and garages; unless other parties are explicitly specified as having statutory responsibility in a lease or management agreement.

4.2 This Policy is inclusive of electrical heating and hot water systems.

### 4.3 Property Classification

- All Connect Housing's properties will be categorised according to their potential to have an electrical supply installed.
- Those properties identified as not having an electrical supply, but with the potential to have an electrical supply, will be reviewed every 5 years to ensure that Connect has an accurate record of properties requiring electrical safety tests.

### 4.4 Record Keeping

- The requirement whether to undertake an electrical safety visit or not will be held within the core housing management database system ("the database system").

- Details of powered doors, gates and barriers and lightning protection systems to be maintained will be held within the database system..
- A database will be established to identify all buildings which require PAT, this will include the latest certificate, the date of last test and the date next test falls due. This database will be maintained by the Customer Safety Team.
- All records relating to these safety checks and maintenance shall be kept in line with the Data Retention Policy and Governance arrangements.
- Certificates associated with these visits will be held in an electronic document management system and shall be made available to the customer(s) of the premises on request.
- Electrical systems and appliances owned by Connect Housing will be repaired and maintained to approved standards.
- Connect Housing will carry out regular validation checks to identify whether properties not recorded on QL are required to be added.
- A full Electrical Installation Condition Report (EICR) will be completed when a property is first recorded on the database system, and when changes occur. Such changes will include:
  - New Property Acquisitions
  - New Build
  - Refurbishment
  - Change of Tenancy or Tenure (any reason)

#### 4.5 Contractors Competency

- Connect Housing has a responsibility to ensure that directly employed engineers and contractors are appropriately skilled and qualified and are competent to undertake the relevant services. The following controls will operate to ensure competence can be demonstrated:
  - Only suitably qualified electrical contractors shall be engaged to undertake work on electrical installations. For example [The National Inspection Council Electrical Installation Contractors \(NICEIC\)](#) or the [Electrical Contractors Association \(ECA\)](#) offer an industry recognised standard of training for engineers. Other UK registered bodies may also be acceptable. It is expected that contractors shall demonstrate that all engineers engaged in work for Connect Housing shall meet the respective standard of training.
  - Only suitably qualified and competent Lightning Protection Systems specialist contractors shall be engaged to undertake work on lightning protection systems and shall be a member of ATLAS (The Association of Technical Lightning & Access Specialists). Other UK registered bodies may also be acceptable.

#### 4.6 Internal Competency

- Connect Housing will ensure that all colleagues undertaking key roles within the delivery and management of this area will have access to training and support applicable to their roles.
- 4.7 Where properties are managed on behalf of external owners and also where Connect properties are managed by 3<sup>rd</sup> parties, responsibilities for electrical safety are set out in the terms of the management agreement.

## 5.0 Monitoring

- 5.1 **Connect Housing Board** is the Landlord and as such is the legal entity responsible for meeting the required standards. It requires regular assurance on the performance of this Policy. Board will oversee the discharge of the required standards and will receive regular reports on the performance of this policy, and is accountable for ensuring its implementation. It will also ensure that appropriate governance arrangements are in place. The Board, through the Audit and Risk Management Committee, will receive regular summary reports on performance as detailed in this policy and be responsible for ensuring any necessary remedial action is undertaken to comply with the policy.
- 5.2 **Audit and Risk Committee** – will receive quarterly KPI reports and commentary on landlord compliance performance. It will draw any concerns they may have arising from such reports to the attention of the Board.
- 5.3 **Connect Housing Chief Executive Officer** will retain the overall responsibility for the monitoring of the consistent implementation of this policy.
- 5.4 **The Director of Home** shall have overall responsibility for Electrical Safety and for implementing this policy They shall appoint /nominate Principle Duty Holders for relevant areas of electrical safety as described within this Policy.
- 5.5 **Director of Finance and Resources and the Senior Manager Business Assurance** shall provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. Implementation of this policy and monitoring of audit feedback shall be the role of the Business Assurance Team who will also oversee the timetable for review of each Landlord Compliance service area.
- 5.6 **Data Governance** – electrical safety responsibilities will be held within a master database (QL). The completeness of the master database will be regularly validated and reconciled . The reconciliation will identify the addition or removal of any properties which require inclusion or removal from the programme i.e. new build, acquisitions, disposals and sales. The number of Officers who can add or remove properties within the master database will be limited and closely managed. Other databases or spreadsheets used to manage the implementation of this Policy will also be reconciled with the master database on a regular basis.

#### 5.7 Key Performance Indicators

- Performance reports will be taken direct from the Connect's databases to ensure compliance can be monitored against minimum agreed Performance Indicators. The Audit and Risk Management Committee and Board will regularly receive high level KPIs as follows:
  - % of Office / Communal Properties having a completed periodic Electrical Installation Condition Report less than 5 years old (EICR)
  - % of Domestic Properties having a completed periodic Electrical Installation Condition Report less than 5 years old (EICR)
- In addition to the above Performance Indicators weekly Management Performance reports will be generated for designated senior managers, and each Health and Safety Working Group meeting. The detailed MPI's will include
  - % of Office / Communal Properties having a completed periodic Electrical Installation Condition Report less than 5 years old (EICR)
  - % of Domestic Properties having a completed periodic EICR less than 5 years old
  - % of 3rd party Quality Audits completed on electrical certificates (cumulative financial year to date),
  - % of Communal and Domestic EICR with C1 and C2 remedial works outstanding (unsatisfactory certificates).
  - % of Buildings with Portable Appliance Testing (PAT) completed
  - % of automated doors risk assessed /serviced
  - % of automated gates and barriers risk assessed /serviced
  - % of Lightning Conductors inspected and tested

5.8 Commentary will be provided for any properties out of date to include the date they became overdue, days overdue, and their position within the legal process to bring them back into a compliant position.

5.9 **Audit and 3rd Party Assurance** - this service area will be included within the cyclical Internal Audit Programme which will review (in particular) adherence to policy, data and record keeping.

5.10 In addition, Connect Housing will seek additional independent 3rd Party Quality Assurance to ensure they can robustly demonstrate electrical safety compliance by procuring independent specialist to regularly inspect, monitor and report on the technical performance and quality of this business-critical service area.

5.11 Electrical safety is a priority for Connect in order to ensure we provide our customer's with safe homes and this policy will be reviewed on an bi-annual basis. If, as a result of either the finding of the Internal Audit Programme, or other investigation, the service is not performing to the desired level then this will trigger an external strategic review.

## 6.0 Policy Statement

6.1 The Chief Executive, Directors and the Board of Connect acknowledge their moral and legal duty to ensure that all employees, tenants, and any other visitors

to premises under Connect Housing's control, are adequately protected from all foreseeable electrical safety risks that may arise.

- 6.2 In order to achieve this, Connect Housing will ensure that adequate resources are made available, suitable and sufficient assessments of electrical installations are conducted, and appropriate preventive and protective measures are identified and implemented in all premises under Connect Housing's control.
- 6.3 Connect Housing aims to provide a safe environment in which our tenants (and other relevant persons) are assured that the risk of electric safety related injury is minimised. Across our stock we have a variety of tenants and our approach will take into consideration additional needs for vulnerable, older, and mobility impaired residents.
- 6.4 In order to comply with regulatory standards and legal obligations, and to ensure the safety of its customers, staff, contractors and visitors to its properties, Connect Housing will:

### **Process**

- Provide clear lines of responsibility for the management of electrical safety.
- Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake electrical safety checks, which shall include legal action when required.
- Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.).

### **Delivery**

- Clarify Connect Housing's approach to inspections and testing of fixed wiring systems within Commercial and Communal Areas that ensures inspection, testing, recording and rectification of defects to the electrical circuits are undertaken to ensure they are maintained in a safe condition, so as to prevent risk of injury or death to any person.
- Ensure that all domestic properties hold, or are part of a forward programme to provide a current Electrical Installation Condition Report (EICR).
- Ensure all domestic electrical installations are tested and certified prior to letting.
- Clarify our approach to inspections and testing to automated powered doors, gates and barriers, so to ensure that through regular inspection, testing, recording and rectification of defects that automated, powered doors gates and barriers are maintained in a safe condition, to prevent risk of injury or death to any person
- Clarify our approach to inspection and testing that ensures inspection, testing, recording and rectification of defects to the Lightning Protection Systems, are maintained in a safe condition, so as to prevent risk of injury or death to any person.

- 6.5 New electrical installations will comply with [BS7671 Institution of Engineering & Technology \(IET\) Wiring Regulations](#) including all amendments current at the date of the electrical works (17<sup>th</sup> Edition, 18<sup>th</sup> Edition from 1st January 2019) and [Part P Building Regulations](#).
- 6.6 Each home included within the electrical upgrade programme will be upgraded in accordance with the current version of BS7671 (IET Wiring Regulations) and Part P of the Building Regulations, resulting in the issue of:
- A 'Satisfactory' Electrical Installation Condition Report (EICR)
  - An appropriate electrical test certificate ([NICEIC/ ECA or other UK registered body](#))
- 6.7 Where properties are managed on behalf of external owners, responsibility for electrical safety is set out in the terms of the management agreement.
- 6.8 Where properties owned by Connect Housing are occupied or managed by external parties, responsibility for electrical safety is set out in the terms of the lease or managing agreement.
- 6.9 Connect will take all reasonable steps to gain access to properties to carry out electrical testing and maintenance, taking account of particular needs and vulnerabilities of customers. There will be a detailed record of all attempts to gain access. If reasonable access is not provided Connect Housing will escalate action and seek a legal or legislative remedy to ensure access is gained at the earliest possible opportunity in accordance with best practice. Where necessary, Connect will seek to use possession proceedings under the terms of the tenancy agreement, and/or seek a Court Order / Injunction to gain access, with all costs incurred in so doing being recharged to the tenant.
- 6.10 We will proactively assess data (where available) for relevant information about the customer to help gain access (disability, vulnerability etc).
- 6.11 Emergency evacuations relating to electrical safety should be read in conjunction with neighbourhood emergency response plans and business continuity plans should an emergency incident be declared.

6.12 **Testing of fixed Wiring Systems**

- Based upon current good practice guidance and assessed risk the following cycles of testing of fixed wiring electrical systems shall be implemented:

Property Type	EICR Cycle*
<b>Common / Communal Areas</b>	
Internal	5 years
External	5 years
<b>Domestic Stock</b>	
High Rise	5 years
Elderly Persons	5 years
Non-Trad Stock	5 years

Trad Stock	5 years
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- All Connect Housing properties hold, or are part of a forward programme to provide a current Electrical Installation Condition Report (EICR) in line with the above standard. The standard will be fully achieved across all properties by March 2021.
- Remedial works arising from fixed wire testing within communal areas and the domestic stock will be prioritised and a timescale for action applied.

#### 6.13 **Portable Appliance Testing**

- Connect Housing will risk-assess appliances provided by them which are used by employees, residents, customers and visitors and undertake Portable Appliance Testing (PAT) on a risk assessed schedule as per the Code of Practice for In-service Inspection and Testing of Electrical Equipment.
- The cycle of subsequent re-testing will be established within the initial test and be risk based

#### 6.14 **Automated Doors, Gates and Barriers**

- The frequency of inspections and procedures will be on an annual basis.

#### 6.15 **Lightning Protection Systems**

- The frequency of inspection/ testing shall be on an annual basis

## 7.0 Inclusive Services

7.1 Connect Housing puts people at the heart of everything we do, to ensure customers are happy with the service we provide. To do this, we always strive to provide an inclusive service.

7.2 To achieve our aims, we have put in place, a wide range of support tools and adaptations to services that can support our diverse customer base, including our vulnerable customers. In addition, we are constantly seeking to improve our service to customers and will continue to introduce new and innovative ways to achieve this.

7.3 While we treat all tenants and their homes with courtesy and respect, listening and responding to individual needs, we also recognise that our customers' safety, and that of visitors to their property is paramount. We must ensure that we gain entry to undertake appropriate safety checks, servicing and repairs. We will always try to work with the tenant to resolve any issues and gain entry and any relevant information is passed to our employee or our contractor to enable an appropriate response.

7.4 We operate in a community with wide social diversity and are committed to providing equal opportunities and value diversity. We will treat all tenants fairly, with respect and professionalism, regardless of gender, race, age, disability, religion, sexual

orientation and marital status. We recognise the importance of working in partnership with our tenants to develop and continually improve our services and raise standards, and will work in line with our Neighbourly Places team.

7.5 All activities will be subject to compliance with The General Data Protection Regulations (2018)

## 8.0 Value for Money

- 8.1 It is our aim to continually assess opportunities to enhance our services to customers and actively involve our employees and customers to achieve value for money.
- 8.2 We continually look for the best value for money by sourcing the best services and materials at the best price. And we're always looking for ways to make our services work more efficiently and effectively.
- 8.3 There is a culture of "do the right things" and "do things right", helping ensure our service delivery is efficient, effective and economical.

## **Appendix 1 - Glossary of Terms**

For the purpose of this policy the following terms will mean:

**“So Far as Is Reasonably Practicable”** this involves weighing a risk against the trouble, time, physical difficulty and money needed to control it.

**Landlord** will mean Connect Housing.

**The National Inspection Council Electrical Installation Contractors (NICEIC)** or the Electrical Contractors Association (ECA) offer an industry recognised standard of training for engineers.

**ECA** - The Electrical Contractors' Association is the main trade association for contractors involved in electrical engineering projects in England, Northern Ireland and Wales.

**Health and Safety Executive (HSE)** –Non-departmental public body in the United Kingdom responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare, and for research into occupational risks in England and Wales and Scotland

**The Regulator of Social Housing (ROSH)** – responsible for responsibility for the regulation of social housing providers in England.

**QL** CONNECT HOUSING’s electronic housing management system

**Lightning Protection System** - A lightning protection system is designed to protect a structure from damage due to lightning strikes by intercepting such strikes and safely passing their extremely high voltage to "ground".

**Lightning Conductor**, A lightning conductor is a metal rod or metallic object mounted on top of a building, electrically bonded using a wire or electrical conductor to interface with ground or "earth" through an electrode, engineered to protect the building in the event of lightning strike.

**ATLAS**, The Association of Technical Lightning & Access Specialists. ATLAS accredited companies must fulfil and maintain high criteria to gain membership.

## **Appendix 2 - Current legislation applicable to this policy:**

- Health and Safety at Work Act 1974
- IET Wiring Regulations BS7671:2018 inclusive
- Management of Health and Safety at Work Regulations 1999
- Workplace (Health Safety & Welfare) Regulations 1992
- Control of Asbestos Regulations (CAR) 2012
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (2013)
- The Electricity at Work Regulations 1989 (EAWR)
- The Management of Health and Safety at Work Regulations (1999)
- Landlord and Tenant Act 1985
- Occupiers Liability Act 1984
- Equality Act 2010
- The Construction Design and Management Regulations 2015
- Supply of Machinery (Safety) Regulations 2008 as amended by the Supply of Machinery (Safety) (Amendment) Regulations 2011
- BS EN/IEC 62305 Lightning Protection Standard
- The Management of Houses in Multiple Occupation (England) Regulations 2006
- Regulator of Social Housing Regulatory Standard (The Home Standard) 2015