

The Wrekin

Housing Group

Electrical Safety Policy

1.0 Introduction

- 1.1 The Wrekin Housing Group (the 'Group') is a Community Benefit Society registered with the Financial Conduct Authority under the Co-operative & Community Benefit Society Act 2014. Our main business is the provision of social housing, care and support, adding social value to the lives of the people who receive our services and live in our communities.
- 1.2 The Group is committed to ensuring that residents' homes, offices, and commercial premises are safe and secure places to live and work. The Electrical Safety Management Policy documents how we will achieve our objectives of keeping people safe, ensuring that electrical installations and equipment are appropriately managed and that we meet our legal obligations as a landlord, care provider and employer.

2.0 Policy Statement

- 2.1 The Group accepts its legal duties under the regulatory standards, as the Duty Holder, under the Health and Safety at Work Act 1974, The Electricity at Work Regulations 1989, and the Housing Act 2004 regarding electrical safety.
- 2.2 The Group will:
- 2.2.1 Identify, make and keep an up-to-date record of all locations where electrical systems or equipment is installed, owned or managed by the organisation.
- 2.2.2 Assess the risk of the electrical installations and electrical equipment and implement programmes of work to ensure all are maintained on an ongoing basis.
- 2.2.3 Routinely inspect, test, maintain and repair electrical installations and equipment to ensure they remain safe for continued use. This includes fixed wiring within its properties (owned, leased, managed etc.), portable appliances, fixed equipment (including heating and hot water systems), cooking and catering equipment, IT equipment, tools and plant.
- 2.2.4 Undertake an Electrical Installation Condition Report (EICR) on every electrical installation at a maximum interval of 5 years. This interval may be reduced on a case-by-case basis dependent upon any causes for concern identified.
- 2.2.5 Undertake an EICR on an electrical installation before a new tenancy (void or mutual exchange) begins to verify that the property is electrically safe and will be throughout its duration.
- 2.2.6 Carry out all electrical work, including inspection and testing, under the Requirements for Electrical Installations: IET Wiring Regulations BS 7671

Current Edition and ensure that work carried out by appointed Contractors also meets these requirements.

- 2.2.7 Ensure a robust process is in place for the management of any follow-up works required following the completion of an EICR or inspection and testing of electrical equipment.
- 2.2.8 Where any Classification Code C1 observations where immediate danger is present are identified, the Group will ensure that these are rectified or that part of the electrical installation is isolated immediately. Under no circumstances will a Classification Code 1 observation remain outstanding after completing an EICR.
- 2.2.9 Upon undertaking an EICR, if any Classification Code C2 or Further Investigation (FI) observations where potential danger is or may be present are identified, these will be rectified - preferably on the same day the EICR is undertaken. Where it is impossible to undertake the works on the same day, a subsequent visit will be arranged with the Classification Code C2 or Further Investigation (FI) rectified as soon as practicable. In no case, will this exceed 28 days from the date of the initial EICR.
- 2.2.10 Upon undertaking an EICR, any identified Classification Code C3 observations recommended for improvement will be given due consideration and scheduled into future planned works programmes as required.
- 2.2.11 Where the inspection and testing of electrical equipment identifies defects that may pose a risk, the equipment will be immediately taken out of service and adequately labelled. If the equipment is to be put back into service, this will only happen where required repairs are undertaken, and the outcome of a subsequent inspection and test is satisfactory. The equipment must be confirmed as being safe for continued use.
- 2.2.12 Conduct formal inspection and testing of lightning protection systems at intervals not exceeding 11 months and carry out repairs and maintenance to the system to ensure its continued effectiveness.
- 2.2.13 Obtain ongoing work records to evidence the maintenance of electrical installations and equipment. The Group will ensure that accurate records are held for each building- including actions identified from EICRs- timescales are set and action plans are put in place to ensure such works are completed.
- 2.2.14 Ensure that those undertaking such activities, including managing the process, are adequately trained and competent.
- 2.2.15 Ensure that staff, contractors and consultants appointed to assist in undertaking auditing, inspections, testing, installation, repair and maintenance-related works are competent to carry out their duties.
- 2.2.16 Ensure that Group staff and all contractors undertaking electrical works are enrolled on a UKAS Accredited Competent Persons Scheme and maintain such accreditation.

- 2.2.17 Prepare an Electrical Safety Management Plan (ESMP) that describes how the organisation will manage the electrical safety of its electrical installations and equipment.
- 2.2.18 Take the necessary steps needed to put the ESMP into action.
- 2.2.19 Review and update the ESMP to ensure that it remains valid and relates to the range of electrical installation, equipment and appliances within the Group's property portfolio.
- 2.2.20 Put in place an Access Procedure that will be adhered to at all times to ensure that anniversary dates are satisfied and appropriate legal action can be undertaken where required.
- 2.2.21 Ensure that those who control access to the organisation's homes or buildings have co-operated in managing the electrical installation(s) and electrical equipment, including leaseholders, 3rd party landlords and managing agents.
- 2.2.22 Ensure that all equipment required to undertake the electrical installation inspection and testing works are adequate and maintained to ensure their correct function and reliability.
- 2.2.23 Ensure that suitable and sufficient risk assessments, methods statements and safe systems of work are in place for all electrical work and other work activities, including the use of electrical equipment or appliances.
- 2.2.24 Ensure that the procurement and appointment of contractors, consultants and direct labour organisations (DLO) include assessment criteria to evaluate their competency and performance as part of a quality-based evaluation. This evaluation will be sufficiently weighted to ensure the best value option in the selection process. Best value will be continually monitored throughout the delivery of the works/service by implementing Key Performance Indicators (KPIs).
- 2.2.25 Ensure that any property acquisitions, including new build development properties, are incorporated within the cyclical inspection and testing programme with current valid reports/certification held on file at the point the acquisition takes place. Particular consideration will be given to "buy back, mortgage rescue, or share ownership reversal" where an existing occupant remains and enters into a lease with the Group as a Landlord, where the condition and maintenance history of the appliance and installation is limited or unknown.
- 2.2.26 Maintain property databases and works information to assure the Group Board and all key stakeholders that electrical safety is effectively managed.
- 2.2.27 Undertake a continuous improvement process, independent assurance and scrutiny for electrical safety management. This will be achieved through internal and external auditing of works, documentation, and implementing actions and recommendations highlighted as part of these audits.

- 2.2.28 Utilise independent third parties to conduct quality assurance audits of electrical works, applied across all work streams, including post-completion and work-in-progress audits and desktop reviews. Findings will be reviewed, necessary action taken and relevant measures implemented to improve the quality of work.
- 2.2.29 Provide advice to customers regarding electrical safety through leaflets and information on the Group's website. through leaflets, user, heat/smoke/ CO alarms instructions and information on the Group's website, as well as providing copies of Landlord Gas Safety Records should be included.
- 2.2.30 Ensure that any building refurbishment or alteration work that could impede gas safety is prohibited. Where building works impacting (or has the potential to impact) gas appliances is required (e.g. external work on appliance flues), pre and post-gas safety checks are performed to ensure that gas safety is not compromised.
- 2.3 To ensure compliance with legislation and this policy, performance reporting will be provided to the Executive Management Group (EMG) and the Audit and Assurance Committee as detailed within section 7.
- 2.4 The Group acknowledges that failure to meet the requirements set out within the Health and Safety at Work Act 1974 and The Electricity at Work Regulations 1989 could lead to prosecution by the Health and Safety Executive (HSE) under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007, a serious detriment judgement from the Regulator of Social Housing (RSH) and enforcement under the Housing Act 2004 by the local authority

3.0 Policy Scope

- 3.1 This policy applies to all staff, tenants, service users, visitors, contractors, third-party providers and other people affected by the acts and omissions of the Group concerning electrical safety management.
- 3.2 This policy applies to all domestic and non-domestic premises (or parts), within the scope of the Electricity and Work Act 1998, and other relevant legislation relate to HHW installations and equipment owned or managed by the Group.
- 3.3 The Group must ensure it complies with the Regulator of Social Housing's (RSH) regulatory framework and consumer standards for social housing in England. The Home Standard is the primary one applicable to this policy.

4.0 Definitions

- 4.1 **Competent/ Competency** – refers to staff with the required training, skills, knowledge and experience to undertake the role, action or task that has been delegated to them. The specific requirements to meet the level of competence for a given roles are detailed within the ESMP.
- 4.2 **Electrical Safety Management Plan (ESMP)** – the detailed documented procedures to process and delegate responsibilities

4.3 **Electrical Installation Condition Report (EICR)** – a periodic inspection and test of an electrical installation and reporting of the findings.

5.0 Roles and Responsibilities

5.1 The Wrekin Housing Group Board and Group Chief Executive have overall governance responsibility for implementing the policy, its effectiveness and compliance with statutory requirements. The Group Board will:

- Through the **Audit & Assurance Committee**, have oversight and scrutinise electrical safety management performance reporting information and electrical safety management arrangements. This includes ensuring that there are suitable risk control measures in place;
- Ensure sufficient funds and other resources are provided for establishing, implementing and continually improving Electrical safety across the Group.

5.2 The **Executive Directors and Senior Managers** will oversee the implementation of this policy and will monitor and review its effectiveness by:

- Ensuring that this policy is applied consistently across the Group;
- Ensuring that sufficient resources are available to meet the requirements of preventative, protective and control measures;
- Ensuring that current electrical safety legislation and associated regulatory guidance are complied with;
- Ensuring the appointment of a responsible person, responsible for ensuring maintenance an adequate system of monitoring Electrical safety performance, identify any failure/ non-compliance and take appropriate remedial action, ensure information is provided for reporting to the Board and Executive Management Group.
- Ensuring suitable reporting mechanisms are in place to monitor the electrical risk of the organisation and reporting at Executive Management and Board levels;
- Ensuring that a positive culture surrounds the management of, and compliance with, electrical safety management prevention and protective measures. This includes in the workplace and to customers by delivering communications to employees that positively promote electrical safety;
- Being responsible for the effective management, monitoring and progression of safety issues within their service area;
- Ensuring that effective management systems are in place to achieve high standards of electrical safety management;
- Ensuring a regular review of the electrical safety management structure with delegated organisational responsibilities for implementing this policy and local electrical safety management arrangements.

5.3 The **Director of Care and Support** is the responsible person for CQC prosecutions for failing to provide care and treatment in a safe way (including incidents relating to electrical safety).

5.4 The **Resident Safety Manager** is responsible for the implementation of, and adherence to, this policy across the Group and:

- Developing and reviewing the Electrical Safety Management Policy and the ESPM for the Group;
- Preparing reporting and performance monitoring information, including non-compliance related to electrical safety;
- Ensuring competent persons are appointed to assist in undertaking the Management of electrical safety management;
- Monitoring best practices and innovation to ensure that electrical safety management arrangements remain current and up to date with developing technical standards;
- Ensuring systems and processes are set up to manage electrical installations, equipment, appliance, and works across the Group;
- Appropriately monitoring the work of the Mechanical & Electrical Category Team, who is operationally responsible for delivering the ESMP.
- To be the Duty Holder for the Group as part of the registration with a UKAS accreditation system body for carrying out electrical work (NICEIC).
- To be responsible for maintaining the overall standard and quality of the electrical installation work undertaken, including ensuring that employees are competent to carry out the range of work required of them.
- Appointing a Qualified Supervisor(s) who are electrically competent persons with specific responsibility for the safety, technical standard and quality of electrical installation work completed.

5.5 The **Statutory Compliance Manager / Electrical & Mechanical Category Manager** is the operational lead responsible for the delivery of the ESMP and they must be competent to carry out this role. Competency will be measured by experience and through holding a minimum Level 4 VRQ in the management of electrical safety management, or equivalent They are responsible for:

- Ensuring that appointed Contractors are registered with a UKAS accredited Competent Persons Scheme, i.e. NICEIC, are procured and appointed to deliver all electrically related work programmes.
- Ensuring that the relevant competencies/qualifications of direct employees and contractors carrying out electrical work on a routine basis are monitored and ensure this is evidenced appropriately;
- Setting up practices, procedures and processes to ensure the policy is delivered;
- Monitoring the effectiveness of the practices, procedures and processes, reviewing and updating these accordingly;
- Ensuring the continued effectiveness of electrical safety measures within Group premises and compliance with electrical safety legislation and guidance;
- Procuring, managing and monitoring the electrical safety-related contracts (e.g. installation inspection programme upgrade and rewire work);
- Providing monitoring information for compliance reporting to the Executive Directors and the Group Board;
- Ensuring EICRs are carried out to all Group premises that require one and that a competent person carries out all periodic inspections;
- Ensuring that electrical defects are appropriately prioritised (low, medium, high) and that they are actioned within the timescales allocated;

- Annually undertaking an asset data review to ensure adequate assurance is provided and that electrical safety data held against the Group's property assets is accurate and up to date;
- Ensuring that employees who are responsible for electrical works receive adequate information, instruction, supervision and training. Taking particular regard to new or inexperienced employees to prevent risk of harm as a result of work and provide adequate supervision with regards to the nature of the work involved.

5.6 **Delegated Organisational Responsibilities** - responsibility for delivering electrical safety objectives is delegated to roles throughout the Group's management structure. These roles and their responsibilities are detailed within the ESMP.

6.0 Relevant Legislation

6.1 This policy ensures compliance with the Regulatory Framework and Consumer Standards (Home Standard) for Social Housing in England and The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

6.2 The principle legislation applicable to this policy is the following:

- Electricity at Work Regulations 1989 came into force on 1st April 1990.
- Housing Health and Safety Rating System introduced under Part 1 of the Housing Act 2004

6.3 The principle approved Codes of Practice and guidance applicable to this policy are:

- Requirements for Electrical Installations: IET Wiring Regulations BS 7671 Current Edition
- IET Code of Practice for In-Service Inspection and Testing of Electrical Equipment Current Edition
- IET On-Site Guide and Guidance Notes 1-8 Current Editions
- Electrical Safety-First Best Practice Guides
- Electrical Safety Roundtable Code of Practice for the Management of Electro technical Care in Social Housing
- Protection against Lightning. Physical Damage to Structures and Life Hazard BS EN 62305-3 Current Edition
- HSR25 The Electricity at Work Regulations 1989
- HSG85 Electricity at Work: Safe Working Practices
- GS38 Electrical Test Equipment for Use on Low Voltage Electrical Systems
- HSG107 Maintaining Portable Electrical Equipment

6.4 This Electrical Safety Management 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;
- Regulatory Reform (Fire Safety) Order 2005 Occupiers’;
- The Building Regulations 2010 (Incorporating Part P);
- Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020;
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Provision and Use of Work Equipment Regulations 1998 (PUWER);
- Plugs and Sockets etc. (Safety) Regulations 1994;
- Consumer Protection Act 1987;
- The Occupiers' Liability Act 1957 and Occupiers' Liability Act 1984;
- Personal Protective Equipment at Work Regulations 2022;
- Hazardous Waste (England & Wales) Regulations 2005 (as Amended);
- Control of Substances Hazardous to Health (COSHH) Regulations (as amended) 2002;
- Construction, Design and Management Regulations 2015;
- Defective Premises Act 1972;
- Landlord and Tenant Act 1985;
- Data Protection Act 2018;
- RIDDOR - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.

7.0 Monitoring

7.1 Compliance with this policy will be achieved by delivering its objectives by the operational and management teams. The effectiveness and performance of the policy will be monitored through regular reporting to the Group Board and the Executive Management Group (EMG).

7.2 Reporting to the Audit and Assurance Committee – Quarterly:

Electrical Installation Inspection and Testing (EICR)	Portable Appliance Testing (PAT)
<ul style="list-style-type: none"> • A Total number of locations requiring EICR for all buildings owned or managed by the Group. • The number (and percentage) of properties with a valid 'in date' EICR • Commentary on all overdue EICR and action being taken to address non-compliance 	<ul style="list-style-type: none"> • A Total number of locations requiring PAT for all buildings owned or managed by the Group. • The number (and percentage) of properties with a valid 'in date' PAT • Commentary on all overdue PAT and action being taken to address non-compliance.
<ul style="list-style-type: none"> • The number of notices of deficiencies, improvement notices, and RIDDORs issued in the period. • High-risk hazards and non-compliances identified from procedures that require Board approval to action. • Results of Audits and approval of action plans. • Updates and commentary on audit action plans. • Policy reviews and approval. 	

7.3 Reporting to EMG – monthly: information report to the Audit & Assurance Committee plus:

Electrical Installation Inspection and Testing (EICR)	Portable Appliance Testing (PAT)

<ul style="list-style-type: none"> • The number of outstanding C1 and C2, C3 and FI actions older than 28 days (with commentary where appropriate) as well as detail in the commentary of all outstanding electrical safety actions. 	<p>The number of outstanding equipment/ appliance actions older than 28 days (with commentary where appropriate) as well as detail in the commentary of all outstanding electrical safety actions.</p>
<ul style="list-style-type: none"> • Hazards identified from procedures that require EMG approval to action. • Updates on industry changes to statutory and non-statutory requirements. • Details of a technical audit carried out for work in progress post-inspection audits. • Procedure changes and reviews. 	

8.0 Electrical Safety Management Plan

- 8.1 The Group’s ESMP details the practices, procedures and wider delegated roles and responsibilities for achieving the objectives of this policy. The ESMP is a separate document and is regularly reviewed to ensure that they reflect any operational changes within the Group.

The Wrekin Housing Group	Policy control sheet Electrical Safety Management Policy Policy reference number - 2023/015
Policy Author	Nick Pike Resident Safety Manager
Direct Lead	David Hall Head of Property
Version	V2.0: May 2023
Target audience	All Wrekin Housing Group staff, contractors and third-party providers.
Consultation	Operational Services Team Housing Team Morgan Lambert
Date of Equality Impact Assessment	An Equality Impact Assessment was completed on 11 th April 2022
Date of Data Privacy Impact Assessment	No personal data is processed as part of implementing this policy.
Approving Body	Executive Management Group
Date of final approval	May 2023
Implementation date	May 2023
Monitoring arrangements	Operational Teams Building Safety Team Executive Management Group
Reporting	Executive Management Group – Monthly Audit & Assurance Committee – Quarterly The Wrekin Housing Group Board – Quarterly
Review date	November 2024
Expiry date	May 2025
Review cycle	Three-year review cycle
Policy category	Health and Safety
Associated policies and procedures	Health and Safety policy Fire Safety Policy Gas Safety Space and Water Heating Policy Electrical Safety Management Plan
Policy location	Sharepoint

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Nick Pike	Reviewed in line with policy review	V2.0: May 2023	Executive Management Group – 02.05.23 Review Policy & procedure at EMG in next 18-24 months