

Electrical Safety Policy

April 2020

1 Policy statement

- 1.1 The purpose of this policy is to ensure that Rooftop Housing Group (Rooftop) manages the fixed electrical installations and portable appliances within and around our properties to ensure that we are compliant with the relevant legislation and that the electrical installations within our properties are safe.
- 1.2 This policy aims to ensure that we meet our obligations as a landlord and seeks to provide assurance to the Board and all stakeholders that electrical safety is adequately managed, ensuring the safety of our tenants, leaseholders and the general public.
- 1.3 This document sets out specific guidance to ensure the safety of fixed electrical installations and portable appliances (where applicable) in properties owned and managed by Rooftop. Installations in these properties are to be installed, maintained and serviced to required standards and inspected at appropriate intervals to minimise the risk of electrocution, fire, damage to property, injury and or death.
- 1.4 Electrical hazards arise from poor design, construction and installation, inadequate standards of maintenance, or misuse and incorrect operation. Rooftop will reduce these hazards to a minimum using competent persons, using safe systems of work, approved materials and equipment and through regular testing and inspection.
- 1.5 The implementation of this group practice requires the total co-operation of all members of management and staff, as well as all contractors hired to carry out work involving electrical equipment. The person responsible for implementing this group practice is the Housing Director.

2 Scope and definitions

- 2.1 This policy covers, testing and inspection of all electrical installations, any subsequent follow up repairs or upgrades as well as new build installations. All electrical repairs, upgrades and renewals will be categorised to ensure that the correct levels of priority are given. We will take specific account of any vulnerability or health and safety requirements during the prioritisation process for these works. The policy also covers any portable equipment owned by the organisation.
- 2.2 Electrical systems will be repaired, renewed, upgraded and tested in accordance with industry guidance and manufacturers' recommendations.
- 2.3 Typical installations and systems covered include:
 - Domestic electrical installation
 - Communal landlord installations
 - Emergency lighting systems
 - Door entry systems

- Electric heating systems (including conventional and sustainable heating systems – for example, air source heat pumps)
- Fixed fire or carbon monoxide alarm installations
- Portable equipment owned by the organisation

3 Legal requirements

3.1 Landlords have a legal duty to ensure that their rental property, and any electrical equipment provided, is safe before a tenancy begins and throughout its duration. Under the Health and Safety at Work Act 1974 employers must ensure the health and safety of themselves, their employees, contractors and members of the public. This responsibility extends to the use of and work on electrical equipment and installations. The purpose of this group practice policy is to ensure that Rooftop meet their legal responsibilities in regard to electrical safety.

3.2 This includes:

- Ensuring the electrical installation and equipment is safe when a property is first let.
- Maintaining the electrical installation.
- Carrying out regular visual checks of the electrical installation.
- Inspecting the electrical installation periodically.
- Keeping records of inspections and certified installations.
- Complying with Part P of the Building Regulations for electrical installation work.
- We are committed to ensuring our tenants' and leaseholders' homes and communal electrics remain safe and fit for purpose. In achieving this, we will comply with all relevant legislation and regulations.

4 Responsibilities

4.1 Rooftop responsibilities – Electrical installation, inspection and testing

4.1.1 Rooftop recognises the need to protect its employees and others from the risk associated with electrical installations and electrical works with our properties. We will there ensure:

- A comprehensive testing programme is completed to domestic hardwired electrical installations, communal electrical installations and all portable appliances on a cyclical basis (as determine on page 5).
- All persons undertaking testing, remedial or replacement work on behalf of Rooftop are appropriately qualified and have the skill level to do so. This will be evidenced by obtaining relevant qualification and/or membership certification from contractors.
- Accurate and adequate records are kept and maintained.
- A suitable system in place to manage programmes and testing certification.
- A robust handover process in place between the Development Team and Compliance and Asset Team for all new electrical components and installs
- Data received from contractors will be periodically checked for accuracy, and any errors or discrepancies will be addressed with the contractor and logged/monitored to prevent future occurrences.
- Only approved contractors will be permitted to carry out any electrical work on equipment or installations.
- Contractors comply with health and safety procedures and safe systems of work.

4.2 Employee responsibilities

4.2.1 All employees have a duty of care with regards to electrical safety, this includes:

- Reporting any electrical equipment that they believe to be damaged or faulty. Where this is the case, employees must not continue to use it or permit anyone else to use it.
- Ensuring any employee does not attempt to repair any electrical equipment or electrical supply unless trained and authorised to do so.
- Notifying the Health, Safety and Compliance Manager if the equipment they are using (that is subject to regular safety tests) has not been tested or if the latest test is out of date.

4.3 Tenant responsibilities

4.3.1 Tenants have a responsibility to use electrical devices/ appliances and the electrical systems supplied to properties responsibly to protect the health and safety of themselves and others. Rooftop will provide information on a periodic basis to tenants which will inform them of the responsibilities of all parties in ensuring their safety

4.3.2 Information on the dangers of Electrical Installations will be made available for Rooftop residents in a clear and accessible way. Methods of communication may include newsletters, dedicated webpages, resident forums and leaflets.

4.3.3 Tenants cannot refuse an ECIR as this is a mandatory health and safety inspection. Refusals or persistent no access will be treated as a breach of tenancy and appropriate action will be followed in line with the tenant's tenancy agreement.

4.3.4 There may be circumstances where an ECIR may need to be postponed, these will be dealt with on a case-by-case basis with the Compliance Team, Neighbourhood Team and the tenant.

5 Timetable of inspection and remedial works

5.1 The IET Guidance Note 3 recommends maximum intervals between periodic testing but the maximum interval is not defined in the legislation. The frequency of inspection to Rooftop properties and equipment has been determined by the overall assessment of the existing installations, maintenance regime and the safety of residents.

Item	Frequency
General needs stock	Change of tenant or mutual exchange. Every ten years reducing to every five years upon anniversary of previous inspection by 2022.
New build	Every ten years reducing to five years. (First inspection to be completed on fifth anniversary of first installation by 2022).
Keyworker/YPS	Annually. A block by block assessment of shared accommodation may be undertaken on a risk-based approach, and the EICR may be undertaken on a more frequent basis.
Extra care housing stock	Change of tenant or mutual exchange.

	Every ten years reducing to every five years upon anniversary by 2022 of previous inspection.
Communal (non-domestic) landlord electrics/supply	Every five years. First inspection on fifth anniversary of first installation or handover date.
Voids and changes of occupancy	A full electrical inspection and test, which results in the completion of an EICR, will always take place at change of occupancy, including voids and mutual exchanges, to confirm the electrical installation is safe for continued use.

6 Electrical Installation Condition Report (EICR)

- 6.1 Every electrical installation deteriorates with use and age. An EICR is like an 'MOT of the electrics' in a property and is issued after a Periodic Inspection. The main purpose of a periodic inspection and test is to detect so far as reasonably practicable, and to report on, any factors impairing or likely to impair the safety of the electrical installation. An electrician will check the condition of an existing electrical installation against BS 7671, the UK Standard for the safety of electrical installations and then issue the property owner with an EICR.
- 6.2 The aspects be covered in an EICR include the following:
- Safety of persons against the effects of electrical shocks and burns.
 - Protection against damage to the property by fire and heat arising from an installation defect.
 - Confirmation that the installation is not damaged or deteriorated so as to impair safety.
 - Identification of non-compliance with the current edition of BS 7671, or installation defects, which may give rise to danger.
- 6.3 Where a partial rewire or replacement consumer unit has been replaced (as part of a planned programme, for example a kitchen refurbishment), Rooftop may class the new Electrical Installation Certificate (EIC) as an appropriate substitute for an ECIR and update the ECIR cycle for another 5 years. This will only be acceptable if the full or partial EIC can demonstrate that:
- The alterations or additions (the installation or replacement consumer unit and any other new work, such as additional final circuit) have been verified in full accordance with the requirements of section 641 of BS 7671, as amended and:
 - The EIC, together with the schedules of inspections and schedules of test results are provided.
 - The EIC should identify in the *comments on existing installation* section, any defects which exist in the reconnected circuits for which improvement is recommended.
 - If a full ECIR on the install has not been provided as part of the work, consideration should be given by the installer to stating this on the certificate with a recommendation that a ECIR should be carried out.
- 6.4 **Minimum requirements for undertaking electrical inspections**
- 6.4.1 As a minimum, individuals undertaking EICRs in any Rooftop property should:
- Have a Level 3 Award in the Periodic Inspection, Testing and Certification of Electrical Installations (QCF) or equivalent.

- Be familiar with and understand the requirements of the current edition of BS 7671 including those relating to periodic inspection, testing and reporting.
- Have their technical ability regularly assessed onsite by a UKAS Accredited Certification Body to verify their inspection and testing competence.

7 Inspection remedial works

7.1 Each observation relating to a concern about the safety of the installation should be attributed an appropriate classification code, selected from the standard codes of C1, C2, C3 and FI. Each code has a particular meaning.

Classification code	Description	Action required
C1	Danger present Risk of injury. Immediate remedial action required.	The fault should be rectified immediately. In circumstances where this may not be possible other appropriate action should be taken to remove the danger – for example: Switching off and isolating the affected part of the installation until the fault can be fully rectified.
C2	Potentially dangerous Urgent remedial action required	Faults will be either rectified at the point of the test or where safe to do so, these will be added to a programme of remedial works. These will be rebooked without undue delay and will be completed within 20 working days Where possible and safe to do so, any circuit containing a C2 fault which cannot be repaired at the time of the test may be disconnected.
C3	Not dangerous or potentially dangerous, but for which improvement is recommended NB – a C3 does not make the EICR unsatisfactory.	C3 observations will be reviewed on the frequency recommended by the electrician completing the ECIR. Where planned works are due, the Asset Management Team will make the certificate available to the planned contractor so C3's can be reviewed and where reasonable, the C3 improvements can be undertaken as part of the planned works. I.e. relocation of socket-outlet mounted in such a position as to result in potential damage to socket during a kitchen upgrade.

FI	Further Investigation required without delay	<p>These recommendations will require an additional inspection to be booked to allow time for further exploration or the fault.</p> <p>The inspection and follow up works will be completed within 20 working days.</p>
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8 Satisfactory and unsatisfactory EICR reports

- 8.1 Upon completion of the inspection and test, the overall condition of the installation should be given as either 'Satisfactory' or 'Unsatisfactory'.
- 8.2 If there are no observations in the report classified as C1, C2 or FI, it would be reasonable for the installation to be reported as 'satisfactory'. Satisfactory certificates will be saved electronically, and the system will be updated with the data.
- 8.3 If any observation in the report has been given a C1 or C2 classification code, or if any observation has been given an 'FI' classification, the overall assessment of the installation must be reported as 'unsatisfactory'.
- 8.4 Unsatisfactory certificates will be saved and the follow up works will be arranged and booked in with the tenant. The installation will remain classified as unsatisfactory until the remedial work is complete, and a minor work certificate is supplied. When both these documents are received the system will be updated with the Satisfactory category and data.

9 Portable electrical appliances

- 9.1 Portable appliance testing (PAT) is the term used to describe the examination of electrical appliances and equipment to ensure they are safe to use. Most electrical safety defects can be found by visual examination, but some types of defect can only be found by testing.
- 9.2 The Electricity at Work Regulations 1989 require that any electrical equipment that has the potential to cause injury is maintained in a safe condition. The regulations do not specify what needs to be done, by whom and at what frequency.
- 9.3 All 'portable' equipment owned by Rooftop that is connected to the electricity supply with a plug, will be inspected and/or tested at installation and thereafter at appropriate intervals. Records of the inspection and/or tests will be made and kept.
- 9.4 Employees must undertake a visual inspection for damage or faults on at least a weekly basis if they are responsible for any electrical equipment that has been issued for personal use, such as laptop and mobile phone charges.
- 9.5 If it is necessary to use electrical equipment outdoors, ensure it operates on a supply of no more than 110 volts or is protected by a Residual Current Device (RCD).

PAT testing frequency		
Location	Frequency of Test	Note
All Rooftop office locations	12 months	Portable appliances owned by Rooftop in use within Rooftop offices and workplaces will be tested biannually - a

		register of all portable appliances will be maintained by the Asset and Compliance Team.
Communal areas and furnished tenancies of domestic properties	12 months	Portable appliances owned by Rooftop and in use within Rooftop housing stock will be tested biannually - a register of all portable appliances will be maintained by the Responsible Person or as delegated to their deputy.
Machinery and plant testing in work locations	Every three years	Frequency may be brought forward if a risk assessment is undertaken and recommends test sooner than the three-year anniversary date.

10 Access for testing and inspections

- 10.1 Due to the importance of completing EICR's, Rooftop will adopt a strict no access procedure which is to be implemented by those managing the testing schedule in conjunction with the Neighbourhood Management Team.
- 10.2 Rooftop will work with our tenants to understand the issues around no access, however on completion of the no access procedure, Rooftop will apply for a Notice of Seeking Possession (NOSP) to provide access in line with the requirements of their tenancy agreements.
- 10.3 Rooftop's approach is to make three documented access attempts, ensuring the tenant is given:
- Adequate notice.
 - Information about why it is important to allow access.
 - A clear explanation of what will happen if access is not permitted on all three occasions.
- 10.4 Failure to allow access after three attempts will result in the case being passed to the organisation's Neighbourhood Team to progress through a Notice of Seeking Possession (NOSP).
- 10.5 This will be served when Rooftop have specific grounds and can demonstrate that a tenant has breached one or more of the terms and conditions of the tenancy agreement and in line with our legislative and regulatory duties which are set out below.
- 10.6 In the event that follow-up work needs to be arranged to remedy electrical works which cannot be completed at the time of the electrical inspection, the process of gaining access will start with the approach outlined in the second letter.
- 10.7 The following legislation may be used as justification for access where needed:
- Landlord and Tenant Act 1985 – Requires the electrical installation in a rented property is “safe when the tenancy begins and maintained in a safe condition throughout the tenancy,” and is kept “in repair and proper working order”.
 - Housing Act – Requires the property to be fit for human habitation.
 - Regulatory Reform Fire Safety Order 2005 England and Wales – Requires the landlord to apply appropriate measures to manage the risk of fire, containment

and escape routes within nondomestic buildings and Houses of Multiple Occupation.

- Defective Premises Act 1972 – Section 4 places a ‘duty of care’ on the landlord in relation to any person who might be affected by a defect which would result in personal injury or damage to their property.
- Electricity at Work Regulations 1989 – Regulation 4.4 requires that any electrical systems which a person comes into contact with or uses at work shall be suitable and maintained in a condition for that use.
- Health and Safety at Work Act 1974 – Section 3 has the effect of requiring a Responsible Person to ensure that its tenants are not exposed to risks to their health and safety. It states that “it shall be the duty of every employer to conduct his undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment who may be affected thereby are not thereby exposed to risks to their health or safety”.

11 Records

- 11.1 Rooftop will ensure certification and records received is checked for accuracy, and that any risks which require attention are addressed. All EICR’s will be electronically saved and the systems updated.

12 Audit of inspection

- 12.1 Rooftop will ensure we continue to protect the health and safety of our employees, residents and contractors by ensuring both internal and external audits take place.
- 12.2 Audits will be undertaken on periodic basis to ensure the following:
- Policies and procedures are fit for purpose and are being followed correctly.
 - Relevant health and safety documentation is in place for all contractors/persons undertaking electrical works in Rooftop properties.
 - Persons undertaking works are competent and qualified.
 - Data and certification are being adequately processed and managed.
- 12.3 Audits may be undertaken in several ways to provide assurance, including:
- Desktop auditing of certification – Internal and external auditors
 - Process and data records audit – Internal and external audits
 - Post works visual inspection – Completed by an external independent auditor
 - Post works electrical test – Completed by an external independent auditor
 - Full compliance audit – Internal and external audit

13 Review

- 13.1 This policy will be reviewed every three years unless there are major changes in legislation or good practice.

14 Consultation (please complete as applicable)

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| 14.1 Leadership Team | April 2020 |
| 14.2 Executive Team | April 2020 |
| 14.3 Other (e.g. customers) | N/A |

15 Responsibilities

15.1	Responsible body	Executive Team
15.2	Formulation and approval of policy	Executive Team
	Amendments to policy	Leadership Team
	Monitoring of policy	Leadership Team
	Operational management of policy/policy author	Health, Safety and Compliance Manager
15.3	Date of formulation of policy	April 2020
15.4	Dates of policy reviews	April 2020

Appendix 1

Associated documents

Internal – Rooftop policies and procedures

- Accident, Incident and Near Miss group practice
- Health and Safety policy
- Health and Safety policy statement
- Portable Appliance Testing procedure
- Risk Assessment group practice
- Personal Protective Equipment (PPE) group practice

External

- Electricity at Work Regulations 1989
- Electrical Equipment (safety) Regulations 2016
- The RSH Home Standard
- Housing Health and Safety Rating System (HHSRS)
- Health and Safety at Work Act 1974
- Provision and Use of Work Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1998
- The Institute of Engineering and Technology (IEE) Wiring Regulations 18th Edition, BS 7671 (Guidance Note 3)
- Landlord and Tenant Act 1985
- Housing Act 2004
- Management of Health and Safety at Work Regulations 1999
- Workplace (Health, Safety & Welfare) Regulations 1992

- Building Regulations (including Part P requirements)
- Regulatory Reform (Fire Safety) Order 2005
- The Electrical Equipment (Safety) Regulations 1994
- Defective Premises Act 1972

