

Electrical Safety Policy

Contents

1. Our purpose
2. Introduction
3. Scope of Policy and Exclusions
4. Definitions
5. Roles and Responsibilities
6. Policy
7. Monitoring and Reporting
8. Assurance
9. Equality Impact Assessment
10. Data Protection Considerations
11. Training and Competency
12. Communication and Implementation
13. Legal and regulatory framework
14. Information Sharing and Confidentiality
15. Document Control

1. Our purpose

We're proud to be able to support tens of thousands of people across England by providing affordable housing and care to help people live independently.

Everything starts at home, and we are privileged to be able to do work which makes a real difference to the lives of people in our communities. Everything we do is about people – whether that's providing a good quality, safe home or providing care which helps someone to live an independent life.

We live and breathe this social purpose.

2. Introduction

This policy sets out GreenSquareAccord's (GSA's) commitment to ensuring compliance with electrical safety legislation, regulations and best practice within properties owned and managed by GSA.

It is supplemented by an Installation, Servicing and Maintenance of Electrical Systems and Equipment Procedure which sets out more detail on our approach to managing electrical safety.

The aims of this policy are to:

- Ensure that we are fully compliant with all legislation and regulations that applies to electrical safety.
- Set out how we will deliver our responsibilities through safe installation and regular inspection, maintenance and upgrades.
- Inform our customers, colleagues and stakeholders about the approach we take in ensuring their safety and explain how they can support us to deliver this.

3. Scope of Policy and Exclusions

The scope of this policy covers all electrical works undertaken by GSA within all properties owned and managed by GSA including:

- Domestic properties - general needs housing, extra care housing, supported housing, 55+ housing, sheltered housing and other rented properties owned and managed by GSA.
- Non-domestic properties - offices, depots, shops, other commercial buildings, blocks and communal areas/common parts, remote plant, and garages.
- All properties, where under a tenancy agreement, lease or contract, GSA has responsibility for maintenance and repairs, including the control of access of maintenance workers into the building and carrying out electrical inspection, testing and repairs.

It also covers electrical testing for third parties (e.g. Managing Agents, Co-ops, Almshouses and Commercial Tenants) where GSA has a management agreement, or lease which places responsibility on GSA to carry out electrical servicing and repairs.

Where GSA has no responsibility for electrical safety activity, but the property is owned by GSA, we will seek written confirmation that the relevant third party are aware of their legal obligations and request the relevant documentation. Certification will be retained for the life of the installation.

This policy does not cover Shared Ownership or Leasehold properties where the obligation to carry out any electrical safety check does not lie with GSA.

4. Definitions

Duty Holder	Anyone who has control of an Electrical System. GSA is the Duty Holder with legal responsibility to ensure the safety of anyone who comes into contact with an Electrical System under our control. We discharge this duty by delegating responsibility for certain tasks to different people (see section 5 for responsibilities).
-------------	---

Electrical Inspection Condition Report (EICR)	A certificate that details the inspection and testing of an Electrical Installation in a property. When carrying out an EICR the assessor will look for: □ potential fire hazards caused by faulty electrics. □ any risk of electric shock. □ a lack of adequate earthing. □ overloaded circuits.
Electrical Installation	The fixed electrical cables or equipment located on the customer's side of the electricity supply meter. It includes electrical wiring, accessories and the fuse box, but not any appliances.
Electrical System	This relates to anything that generates, stores, transmits or uses electricity.
Notifiable Works	These are works which are notifiable under Part P of the Building Regulations. They must comply with the IET Wiring Regulations (BS 7671). They are: □ The installation of a new circuit □ The replacement of a consumer unit □ Any addition or alteration to an existing unit in a special location (which includes bathrooms containing a bathtub or shower).
Portable Appliance Testing (PAT Testing)	The name given to a series of inspections and electrical tests carried out on portable electrical equipment and appliances to ensure they can be used safely.
National Inspection Council for Electrical Installation Contracting (NICEIC)	UK's largest voluntary register of electrical businesses, which regulates training and works for electrical contractors and firms across the UK.

5. Roles and Responsibilities

5.1. The **Group Board** is responsible for ensuring that management of health and safety and asset compliance meets statutory and regulatory requirements and is sufficiently resourced. This includes GSA's approach to electrical safety.

5.2. The **Executive Board** is responsible for putting appropriate arrangements and resources in place for ensuring the safety of customers, colleagues and others so that GSA complies with legal and regulatory standards.

The Executive Board is also responsible for reporting any breach in standards to the GSA Board and reporting any regulatory breaches to the Regulator of Social Housing in line with organisational policies.

5.3. The **Chief Property Officer** is responsible for:

- Ensuring that appropriate mechanisms are in place for monitoring compliance with electrical safety legislation, regulation and policies and procedures.
- Reporting levels of compliance to GSA's Board.
- Ensuring that appropriate resourcing and arrangements are in place (in line with budget capacity) to meet the regulatory, legislative and statutory requirements relating to electrical safety.

5.4. The **Director of Repairs and Maintenance** is responsible for:

- Ensuring that cyclical investment programmes are in place for upgrades to Electrical Installations, including any works, actions or upgrades recommended by assessors as part of the EICR.
- Appointing / nominating sufficient resources to fulfil the Duty Holder role/s for all electrical safety requirements.
- Ensuring appropriate procedures and processes are in place to meet the requirements contained within this policy.
- Planning and implementing an effective performance management framework and associated assurance activities that will strengthen risk control and provide the highest levels of assurance required by this policy.
- Ensuring the operational delivery of this policy to ensure compliance with statutory requirements and raising any non-compliance to the Executive Board or the Head of Health and Safety.
- Ensuring contractors engaged to carry out electrical safety works are procured with the required qualifications and competency.
- Regularly reviewing Internal service provider and/or external contractor operational practices and performance with the Head of Health and Safety.
- Reporting all material issues of non-compliance (whether potential or actual) to the Head of Health and Safety.
- Ensuring regular audits are conducted, providing feedback and action resolutions to the Head of Health and Safety and leading on implementing recommendations.

5.5. The **Head of Health & Safety** is responsible for:

- Reviewing reporting (second line assurance) on electrical safety compliance to the to the Financial Performance and Monitoring Group and Executive Board.
- Ensuring that GSA has appropriate procedures, processes and internal controls in place which comply with all legal, regulatory and policy requirements.
- Ensuring that appropriate mechanisms are in place for monitoring compliance with electrical safety legislation, regulation and policies and procedures.

- Reporting all material issues of non-compliance (whether potential or actual) to the Executive Board.

5.6. The **Head of Heating and Electrical (HH&E)** is responsible for:

- Acting as the first point of contact and competent person for all electrical safety related matters.
- Reviewing changes to legislation, regulations and industry best practice raising any changes to the Director of Repairs and Maintenance and Head of Health of Safety, to ensure that this policy remains compliant.
- Maintaining a master asset database of all properties (domestic and commercial) where we have a responsibility to carry out electrical safety checks and maintenance.
- Managing the availability of correct stock data and landlord compliance data subsets against which work programmes and contracts are prepared.
- Overseeing data reconciliation exercises to ensure that all properties for which we have a responsibility are included on the servicing programme.
- Reporting (first line assurance) on electrical safety compliance to the Financial Performance and Monitoring Group, Executive Board, the GSA Board and its Committees.
- Ensuring the operational delivery of this Policy and compliance with the regulations and statutory requirements.
- Managing customer feedback (enquiries, investigation and resolution of complaints, compliments) in respect to electrical safety.
- Reviewing property addresses and reconciling with contractor databases to ensure work programmes remain accurate.
- Ensuring that GSA colleagues and contractors employed to deliver the commitments outlined in this policy have the skills, knowledge, qualifications, competence and experience necessary and monitoring their operational practices and performance.
- Formulating programmes of work consistent with the delivery of this Policy.
- Ensuring that works are delivered safely and in line with agreed schedules.
- Receiving audit feedback and acting upon findings
- Reporting all material issues of non-compliance (whether potential or actual) to the Head of Health and Safety.
- Monitoring the quality and correct storage of all certification and documents required to demonstrate compliance with electrical safety.
- Implementing a quality assurance process in line with the requirements of the NICEIC, ECA and contract requirements.
- Implementing and maintaining data governance protocols for electrical safety data.
- Liaising with Asset Management colleagues to ensure stock condition data and landlord compliance data sub-sets are accurate, including updating system(s) as required.
- Ensuring that a copy of the latest EICR is available to customers upon request.

5.7. The **Head of Data and Analytics** is responsible for:

- Ensuring that GSA has appropriate controls in place for ensuring the accuracy and integrity of data reported as part of the Performance Committee Pack.
- If appropriate controls can't be put in place this is flagged through the Kitemark assessment for the relevant performance measure.

5.8. The **Head of Procurement** is responsible for:

- Ensuring that the Group Procurement Policy is followed for the procurement of any electrical contractors by contract managers, including appropriate technical and health and safety training/qualifications.

5.9. **Managers** are responsible for:

- Ensuring the effective day to day management of health and safety (including electrical safety) within their scope of responsibility.
- Escalating any electrical safety concerns to the Head of Heating and Electrical or Head of Health and Safety.
- Ensuring that any accidents, incidents, near misses and hazards are recorded, reported and investigated.
- Ensuring colleagues attend electrical safety training, relevant to their role.
- Ensuring electrical safety information is disseminated to GSA colleagues and customers as appropriate.
- Ensuring effective communication of electrical safety information to relevant stakeholders.

5.10. All **colleagues** are responsible for:

- Taking reasonable care of themselves and others around them
- Completing any mandatory electrical safety training relevant to their role within stipulated timeframes.
- Reporting any hazards, defects, shortcomings or issues of non-compliance regarding electrical safety to their line manager (escalating to the Electrical Safety Team where required).
- Complying with all health and safety policies, procedures, associated instructions and working practices.

6. Policy

6.1. Management of Electrical Safety

GSA will carry out electrical inspection and servicing visits primarily using directly employed operatives. However, where we do not have sufficient capacity in-house, we may outsource to an external (GSA procured, appointed and approved) contractor whose delivery of the requirements will be robustly monitored.

GSA will maintain accurate asset information relating to electrical installations for our properties to enable all safety checks, servicing and maintenance requirements are managed effectively and in line with relevant legislation and regulations.

6.2. Electrical Installations and Testing

We will ensure that Electrical Installations in our properties are safe by ensuring that an inspection and Electrical Installation Condition Report (EICR) is completed to the following frequencies:

- at least once every five years (with the inspection and testing taking place on or before the 5 yearly anniversary date of the current EICR or more frequently where our risk assessments suggest that this is appropriate).
- when we acquire a new property (including upon handover of a new-build property).
- following major electrical work.
- where the Electrical Installation is changed or upgraded.

Inspection and testing will be carried out in accordance with the IET Wiring Regulations (BS7671), and any issues will be highlighted as part of the EICR. These are categorised using the following codes:

- **C1** – This indicates that a danger which poses a risk of injury, meaning that immediate remedial action is required. In these circumstances, if the issue cannot be immediately rectified, the Electrical Installation should be made safe, and an emergency repair raised (usually a 24-hour timescale for completion).
- **C2** – This indicates an issue which is potentially dangerous and requires urgent remedial action. It may be possible to continue to use the Electrical Installation, but a repair should be raised as soon as possible. Timescales for the repair will be recommended by the assessor carrying out the EICR in line with the risk.
- **C3** – This indicates that improvements are recommended but there is no danger present. Timescales for any remedial works will be recommended by the assessor carrying out the EICR in line with the risk. This may include a scheduled repair or to recommend an upgrade as part of future cyclical investment programmes.
- **FI** – This indicates something which requires further investigation.

EICRs with **C1** or **C2** actions are deemed **unsatisfactory** and will be reported in GSA's Performance Scorecard. Where only **C3** actions are identified the EICR will be **satisfactory**. For GSA's purposes, any **FI** finding will also be deemed to denote an **unsatisfactory** EICR until the further investigation work is undertaken.

6.3. Maintenance, Replacement and Repair

Repairs, maintenance works and upgrades should be scheduled in line with the assessor's recommendations and the Responsive Repairs Policy.

Any new or replacement Electrical Installations must be completed in accordance with the current IET Wiring Regulations (BS7671), Codes of Practice and any supplier or manufacturer instructions.

Where Notifiable Works are undertaken, contractors must certify compliance with Part P of the Building Regulations.

Further information is set out in the Installation, Servicing and Maintenance of Electrical Systems Procedure.

6.4. Access Arrangements

Customers are required to provide access to GSA engineers and approved contractors to allow us to carry out electrical safety checks, maintenance and repairs in accordance with their tenancy agreement.

We will provide customers with reasonable notice for carrying out an electrical safety checks and works, to minimise any disruption.

If we are unable to gain access to a property for the purposes of carrying out the electrical safety check, we may escalate this in accordance with our Access Procedure which set out our process for gaining access to properties. Under the Procedure, after two unsuccessful attempts to gain access have been made, the Head of Heating and Electrical may refer the case to the Localities Team to secure an injunction for access.

6.5. Electrical Equipment and Appliances

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 frequency of inspection and testing depends on the type of equipment and the environment it is used in. For example, a power tool used daily by our repairs and maintenance operatives will be examined more frequently than an office fan that is used occasionally.

For colleagues working with tools and equipment, please also refer to the Machinery and Work Equipment Policy.

For tools and equipment in daily use, colleagues should carry out a simple visual inspection prior to use to look for signs of damage or overheating, if signs of damage are visible, colleagues should not use the equipment and speak to their line manager.

GSA has a rolling programme of PAT testing for workplaces (including offices, care homes, supported living accommodation and extra care schemes) which covers appliances such as fridges, IT equipment, photocopiers, electric beds etc. Responsibilities for carrying out PAT testing and frequencies for inspection are set out in the Installation, Servicing and Maintenance of Electrical Systems and Equipment Procedure.

GSA will test (and replace as necessary) smoke alarms and heat alarms in residential properties which are not covered as part of the annual gas safety check visit (i.e. the property does not have gas) as part of the electrical inspection and testing visit.

6.6. Unauthorised Occupants

We will only carry out electrical works to properties occupied by unauthorised occupants where there is a risk to their safety, or that of neighbouring properties.

As soon as we are aware of any unauthorised occupation, we will begin proceedings to obtain possession of the property in line with the relevant procedure.

We do not carry out repairs for squatters. Where it is possible to cut off the supply or close down appliances, we will do so whilst taking action to have the illegal squatters removed and making the property secure.

6.7. Operational Record Keeping

EICRs will be carried out every 5 years (unless the assessor recommends an alternative timescale).

The EICR should state:

- Details of the Electrical Installation inspected (including property details and address).
- The date that the inspection was completed and when the next inspection is due.
- The results of the inspection, including actions and timescales for closing out any remedial works.

The HH&E is responsible for commissioning EICRs within the appropriate timeframes, obtaining copies of the EICR from the assessor and storing these in a system with suitable controls. EICRs should be kept in line with GSA Document Retention arrangements.

7. Monitoring and Reporting

The Head of Heating and Electrical is responsible for maintaining a master database where GSA have a responsibility to provide electrical safety checks and maintenance.

Records will be held electronically including

- A copy of the current and previous EICR/PAT documentation and the date of when the next test is due. These documents will be held in line with GSA's documentation retention arrangements. Details of any remedial work/s recommended (C1/C2) to reduce risk and improve electrical safety.
- Training records, which is held by the Learning and Development team.

Completion of EICRs and overdue C2 Electrical Risk Actions are reported to Financial Performance and Monitoring Group via the monthly Performance Pack. Any significant performance deterioration may trigger a recovery plan following discussion between the Financial Performance and Monitoring Group and the GSA Performance Manager.

Performance scorecards including the % of properties with a domestic EICR and overdue C2 actions are reported to GSA Board, Executive Board and Operations Committee.

8. Assurance

- First Line Assurance – The Heating and Electrical ensure all EICR certification is reviewed and signed off by a senior accredited electrician.
- Second Line Assurance is via the Health and Safety Team who usually act as the internal assurance function for GSA and carry out periodic audits, which includes the presence of PAT testing and EICR documentation, escalating any concerns to the Heating and Electrical Team and relevant Head of Service and Director.

Second line assurance is also provided by the Performance Improvement Team who check data as part of KPI / performance reporting.

- Third line assurance is undertaken by GSA's internal auditors, who complete periodic audits on building safety matters, which are fed back to Executive Board and Audit and Risk Committee including any actions required.

Third line assurance is also provided by CORGI Technical Service who carry out independent audits of electrical works on behalf of the Heating and Electrical team.

9. Equality Impact Assessment

We take account of known individual or collective needs identified on the internal housing system (MRI) when planning our electrical safety arrangements. Where needs are identified, we put in place bespoke arrangements as required.

10. Data Protection Considerations

Consideration has been given to data protection by ensuring this policy adheres to data protection principles, including confidentiality, fairness, transparency and data minimisation.

11. Training and Competency

GSA maintains an accreditation with the National Inspection Council for Electrical Installation Contracting (NICEIC) or equivalent for our operational teams carrying out electrical works.

All identified colleagues, through the job-role specific training matrix, will have and maintain their relevant training to be registered in line with the competent person scheme as provided by the

National Inspection Council for Electrical Installation Contractors (NICEIC) and must hold a qualification equivalent to City & Guilds 2391-52 Inspection and Testing.

11.1. Competency

Assessors completing EICR checks and electricians carrying out works and maintenance must hold a qualification equivalent to City & Guilds 2391-52 Inspection and Testing and have experience of the type of Electrical Installation being worked on.

Any contractor undertaking Electrical Installation work in GSA properties must be registered with a competent person scheme as provided by the National Inspection Council for Electrical Installation Contractors (NICEIC), the Electrical Contractors Association (ECA), National Association for Professional Inspectors (NAPIT) or other suitably accredited body.

All contractors appointed by GSA are assessed as being appropriately competent to undertake any works they have been appointed to carry out at the point of procurement. This includes provision of relevant certifications and verification of training records.

The HH&E is responsible for ensuring that, for any new contracts procured, contractors meet the competency and any ongoing training requirements. The HH&E is responsible for the management of external electrical contractors, including carrying out a review of their training and competency annually.

All electrical works carried out by directly employed colleagues and subcontracted electrical operatives will be overseen by an effective management structure and robust procedures to ensure that they are competent for any activities that they are instructed to carry out. This will include checks to ensure that relevant qualifications are maintained, renewed when required, and held locally for inspection.

Training requirements for relevant roles are reviewed by the Learning and Development Lead, the relevant operational Head of Service and the Head of Health and Safety, to ensure that these meet legal requirements and best practice.

12. Communication and Implementation

Communication

- Letters to customers in connection with electrical safety will reiterate the importance of electrical safety in the home, including allowing access for safety checks, inspections, servicing, and remedial works.
- All customers will receive an information leaflet relating to electrical safety as part of their Tenancy Pack. The full range of safety leaflets will also be available on our website and through the intranet for all colleagues. Information will be available in different formats.

Information will be available in different formats as requested, tailored to individual requirements. This Policy will be communicated to colleagues via the internal intranet and the Health and Safety communication programme.

13. Legal and Regulatory Framework

- **Health & Safety at Work Act 1974:** The primary piece of legislation covering occupational health and safety in Great Britain
- **Management of Health & Safety at Work Regulations (1999):** The legislation which sets out duties to assess and manage risks to their employees and others, to help prevent work accidents and work-related illness.
- **The Electricity at Work Regulations 1989:** The legislation sets out what can be done by duty holders to achieve electrical safety compliance with the duties imposed by the Regulations.
- **Workplace (Health, Safety & Welfare) Regulations 1992:** The legislation sets out duties covering a wide range of basic health, safety and welfare issues and apply to most workplaces (except construction sites and some mineral extraction sites).
- **The Provision and Use of Work Equipment Regulations 1998:** These Regulations, often abbreviated to PUWER, place duties on people and companies who own, operate, or have control over work equipment. PUWER also places responsibilities on businesses and organisations whose employees use work equipment, whether owned by them or not.
- **The Building Regulations 2010 (as amended):** These cover the construction and extension of buildings, which are supported by Approved Documents.
- **BS7671 Requirements for Electrical Installations. IET Wiring Regulations:** This relates principally to the design, selection, erection, inspection and testing of Electrical Installations, whether permanent or temporary, in and about buildings generally.
- **Safety and Quality Standards (S&QS) –** a set of standards by the Regulator of Social Housing (RSH) in the UK to ensure that social housing providers deliver safe, decent and well-maintained homes for tenants.

14. Information Sharing and Confidentiality

We will provide information as required in line with relevant law and regulation.

We collect information (personal data) to enable us to:

- manage and support our relationship with customers to comply with legal obligations
- improve our services
- achieve our legitimate business aims

We are committed to complying with data protection legislation when handling data.

Customers have rights including access to their data and to object to the way it is processed. For more information on how and why we process customer data and how customers can exercise their rights please view our full Privacy Policy on our website at [Privacy notice – GreenSquareAccord.7](#)