

## Group Electrical Safety Policy

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### Summary

Housing 21 are committed to ensuring that our residents' homes and office premises are safe and secure places in which to live and work, delivering its responsibilities as a responsible person under all relevant legislation and statutory codes of practice and guidance as detailed in the Legislation section.

Housing 21 will address these responsibilities through:

- The provision of suitable, sufficient and risk appropriate electrical precautions.
- Ongoing and continuous risk assessment.
- Delivering both individual and collective duties; and
- Monitoring and challenging our own performance.

This policy ensures that we meet our obligations as a landlord; ensuring electrical installation and wiring are safe when residents move in and maintained in a safe condition throughout the tenancy. We will take all reasonable steps to prevent and control the risk from electricity in our properties.

### Equality, Diversity and Inclusion

Housing 21 aspires to embed diversity and inclusion within all our organisational activities to enable these principles to become part of our everyday processes.

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<b>Legislation and Regulations</b>
The principle legislative and regulatory documents applicable to this policy
Health & Safety at Work etc Act 1974
The Management of Health and Safety at Work Regulations 1999
The Building Regulations 2010
British Standard 7671:2018 – The IET Regulations
The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (5 <sup>th</sup> edition)
The Electricity at Work Regulations 1989
The Electrical Equipment (Safety) Regulations 2016
Code of Practice for the Management of Electrotechnical Care in Social Housing
Housing Act 2004
Landlord and Tenant Act 1985
Defective Premises Act 1972

## 1. SCOPE

Housing 21 is responsible for the maintenance and repairs to its rented homes and other buildings, all of which contain electrical installations and appliances. The Landlord and Tenant Act 1985 and the Housing Act 2004 places duties on landlords to ensure that these electrical installations are safe at the start of any tenancy and are maintained in a safe condition throughout the tenancy.

Under the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016, Housing 21 is also responsible for maintaining electrical installations and equipment in communal areas and other properties which it owns.

### 1.1 Legal and Regulatory Framework

The Electrical Safety Policy conforms with the Electricity at Work Regulations 1989, Electrical Equipment (Safety) Regulations 2016 and the Health and Safety at Work Act 1974 and associated legislation and regulations.

The application of the policy will ensure compliance with the Regulator of Social Housing's regulatory framework and consumer standards (Home Standard) for social housing in England.

### 1.2 Oldham PFI and Kent PFI

The Oldham and Kent portfolio are managed under PFI contracts. While there are some variations required due to differences in ownership and funding streams, our principles of ensuring statutory compliance remain the same.

Whilst compliance of these PFI contracts is managed outside of Housing 21's Property Compliance team, group assurance is obtained through reporting and review alongside Housing 21 for all core reports.

Further information for Oldham PFI and Kent PFI can be obtained through the Oldham PFI and Kent PFI employees detailed in this policy.

### 1.3 Aims and Objectives

The purpose of the Electrical Safety Policy is to:

- Ensure the prevention of exposure to risks associated with electricity.
- Ensure that any regulatory, statutory, and contractual arrangements are met in relation to electrical safety.
- Promote awareness of the risks of electrical safety and the management procedures through training and communication to employees and residents.

## 1.4 Implementation

To ensure effective management of electrical safety, Housing 21 will:

- Ensure qualified engineers inspect and provide Electrical Installation Condition Report (EICR) at least every five years or more frequently where our risk assessments suggest that it is appropriate, taking into consideration safety, maintenance (reactive and proactive), Asset Management activities, tenant profiling, and external influences.
- Carry out any remedial works for faults listed as C1, C2 and FI identified through the inspection, either immediately or within 28 days thereafter, depending on the action required.
- Use all recognised routes including, where necessary, taking legal action to gain access to properties to obtain a compliant certificate.
- Test our appliances at the following frequencies:
  - Portable appliance testing (PAT testing) at two-yearly intervals
  - Fixed appliance testing (FAT testing) at five-yearly intervals
- Maintain accurate asset information.
- Report on EICR performance to the Safety Forum, Executive Team and Board.
- Seek independent assurance and challenge on our performance.
- Provide information, instruction and training to employees as identified in their Training Pathway.

## 1.5 Scope of buildings

Where Housing 21 owns, controls or maintains the building they are the duty holder for ensuring compliance with the Electrical Safety Policy.

Buildings outside the scope for the organisation include leasehold/tenanted buildings where the organisation does not have maintenance or repair obligations for the building fabric or building engineering services/infrastructure under the lease agreement.

A comprehensive list of buildings where the organisation is the Duty Holder can be obtained from the Asset Management Team.

## 1.6 Record Retention

Suitable records, including relevant certification, in respect of fixed wire testing, PAT and FAT will be kept and maintained up to date in line with the organisations [Record Retention Schedule](#).

## 1.7 Contractors

Housing 21 will employ competent external contractors, accredited by the NICEIC, ECA, NAPIT or other accredited body.

## 1.8 Quality Assurance

Quality assurance is implemented in line with Housing 21's Board Assurance Framework principles.

### 1.8.1 First line of defence:

- Electrical safety policies and procedures are in place and updated within agreed timescales
- Role-appropriate electrical safety training is provided where required
- Electrical safety risks are well understood and managed at an operational and corporate level

- Performance against defined KPIs are regularly reported to Housing 21's Executive Management Team, Safety Forum and Board

#### 1.8.2 Second line of defence:

- Management oversight of electrical safety is provided as per the roles and responsibilities defined in the Group Electrical Safety Policy
- Electrical safety reporting provides assurance to management and is aligned to regulatory requirements where necessary

#### 1.8.3 Third line of defence:

- Housing 21 instructs the NICEIC to carry out monthly independent external audits against electrical hardwire testing. The NICEIC will audit a sample of schemes and check the quality of work in line with the necessary regulations. The NICEIC alternate between electrical contractors on a cyclical basis. Findings are reported to the Health and Safety Forum.
- Additional independent assurance of Housing 21's approach to managing electrical safety will be arranged via external audits as per Housing 21's audit schedule

### 1.9 Data Management and Performance

Property Compliance data is managed in line with the Asset Management and Property Compliance Data Framework, which identifies key data, its source, reporting requirements, accuracy checks and owners. The framework is reviewed annually by the Head of Data and Governance, Head of Group Property Compliance and National Compliance Manager to ensure it still meets requirements.

Performance against the following KPIs will be regularly reported to the Board, Safety Forum, Investment Development Committee and on Housing 21's quarterly scorecard:

- % of hardwire tests (dwellings) no more than 5 years old (calculated to exact date) and no outstanding C1/C2 remedials
- % of hardwire tests (communal) no more than 5 years old (calculated to exact date) and no outstanding C1/C2 remedials

A summary of the NICEIC audit findings will also be regularly reported to the Safety Forum.

### 1.10 Resident Engagement

General information about electrical safety, Housing 21's approach to managing it and residents' responsibilities is available via Housing 21's Building and Fire Safety Guide online and in booklet format. Further electrical safety communications will be provided as and when required.

### 1.11 Significant Non-compliance and Escalation

Housing 21's definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety. All significant non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Housing 21 employee being made/becoming aware of it.

Any incidents identified at an operational level should be formally reported via the ERICA accident/incident reporting system and the process followed which will include investigating the incident and preventing recurrence.

In cases of serious non-compliance, EMT and the Board will review the issue in line with regulatory frameworks and decide if it warrants disclosure to the Regulator of Social Housing, Health and Safety Executive and/or any other relevant organisation.

## **2. ROLES AND RESPONSIBILITIES**

All Housing 21 employees must follow the Electrical Safety Policy. If employees become aware of problems with the effective operation of this policy or the procedures and guidance that support it, they should notify the Health and Safety Team.

### **2.1 The Board**

Are responsible for:

- Overall governance for ensuring the Electrical Safety policy is fully implemented to ensure full compliance with regulatory standards, legislation, and approved codes of practice.
- Formally approving this policy and reviewing it every three years (or sooner if there is a change in regulation, legislation, or codes of practice).

The Board will receive regular updates on the implementation of this policy and electrical safety compliance performance, together with notification of any non-compliance issues identified.

### **2.2 Executive Management Team/Safety Forum**

The Executive Management Team (EMT) and Safety Forum will receive reports on the compliance with the policy and ensure performance is being achieved, together with notification of any non-compliance issues identified.

### **2.3 Chief Executive and Deputy Chief Executive**

The Chief Executive retains the overall responsibility for the implementation of this policy.

The Deputy Chief Executive is responsible for ensuring that adequate resources are made available to enable the objectives of the policy to be met.

### **2.4 Housing 21: Head of Group Property Compliance Oldham PFI: Head of Oldham Kent PFI: Operations Manager**

Are responsible for the operational delivery of the policy and ensuring that:

- Policy and procedures are regularly reviewed and are kept up to date.
- Competent employees are employed to provide technical support on electrical matters.
- Our duty of care to our customers, employees and contractors is robust.
- The organisation has employees assigned with responsibility for the day-to-day management of contracts to ensure contractors deliver safety related checks on time, including continuous external audit.

### **2.5 Housing 21: National Property Compliance Manager and Contracts Manager(s) Oldham PFI: Property Services Manager**

## **Kent PFI: Operations Manager**

Are responsible for:

- Procuring competent contractors, capable of completing electrical testing and auditing (Kent PFI service contractors form part of PFI framework).
- Organising, managing, and monitoring the maintenance and servicing contracts which include the service programme.
- Dealing with contractor related complaints and escalations where necessary.
- Ensure all minor remedial works are completed so that certificates on file are all satisfactory.
- Contacting the Technical Services Manager to review any complex electrical remedials to consider whether these need to form a SIP project and informing the scheme surveyor of these works if needed.
- Updating programmes to include/remove any additional properties following any new builds, acquisitions, major stock investment works or disposals.
- Arranging for sample audits to take place to seek independent assurance on the quality of our contractor testing performance.

## **2.6 Housing 21: Technical Services Manager (Electrical) Oldham PFI: Property Services Manager Kent PFI: Technical Services Manager (Electrical)**

Are responsible for:

- Providing technical expertise to the business in relation to electrical testing and electrical safety, to include advising the business of changes in legislation and regulations.
- Reviewing any complex remedials to ascertain the need, urgency and determine how we should proceed to address the remedial/s.
- Reviewing external audit recommendations in relation to electrical safety and ensuring these are actioned as appropriate.

## **2.7 The National Health and Safety Manager**

Is responsible for:

- Ensuring policies and procedures are written and remain up to date.
- Ensuring staff awareness and training in relation to electrical safety is provided within the organisation.
- Communicating legislative changes and advice relating to changes to the Executive Team and the Board.

## **2.8 Housing 21: Building Surveyors Oldham PFI: Property Services Manager Kent PFI: Housing 21 Building Surveyor**

Are responsible for:

- The co-ordination and management of all major remedial works that would fall under a stock investment project, such as rewiring of a property or scheme.
- Informing the Property Compliance team of changes to assets where these result in a servicing implication and providing the Property Compliance Team with any new documentation relating to the works.

**2.9 Housing 21: Scheme Managers**  
**Oldham PFI: Neighbourhood Services Managers**  
**Kent PFI: Scheme Managers**

Are responsible for:

- When testing dates are provided, managing contractor's access to ensure that all testing can be completed on time.
- Raising works orders for remedials identified through hardwire, FAT and PAT testing.
- Providing a copy of the EICR to tenants within 28 days of receiving a request for the report.
- Providing a copy of the EICR to the local authority within seven days of receiving a request for a copy.
- Confirming if a void property has an electrical installation or periodic test certificate less than five years old and arranging the subsequent test if a certificate is not available.
- Supporting resident liaison, including managing issues relating to access, resident damage, and improvements to electrical systems.
- Reporting contractor escalations to the Property Compliance team.
- The safe disposal of portable appliances and ordering of replacement appliances or remedial works if identified during PAT or FAT testing.

**2.10 Training**

All relevant employees will receive electrical safety training appropriate to their role, including the identification, management and risk from electrical supplies and equipment. Any training required will be available via Housing 21's training platform, FRED.

**3. CONTRACTOR PERFORMANCE**

- Contractor Performance will be reviewed, audited, and compliance monitored regularly to ensure that the programme of service and inspection continues to comply with this policy.
- Housing 21 will carry out sample audits of contractor servicing competence using an external consultant. The findings will be reported to the Safety Forum.
- If employees have concerns, or a resident has raised a concern, regarding contractor performance employees should utilise the [Property Compliance Escalation Form](#), located on the intranet or contact the Property Compliance team directly to discuss their concerns. These concerns will be reviewed by the Contracts Managers who will raise issues at either future contract management meetings or immediately with the contractor, depending on the severity of the concern. Once resolved, the Contracts Manager will provide feedback to the individual who raised the initial concern.

#### **4. CONSULTATION**

Housing 21's Health and Safety Forum and Policy Steering Group have been consulted about the development of this policy.

Specific input of technical advice has been sought from Housing 21 employees with operational knowledge of electrical safety management.

Housing 21's Primary Authority, South Cambridgeshire District Council, Environmental Health have been consulted on the development of this policy.

#### **5. ASSOCIATED DOCUMENTS AND GUIDANCE**

Electrical Safety Management Procedures