

## Electrical Safety Policy

At the time of Policy approval Flagship Housing Group manages in the region of 30,318 tenanted properties. Electrical Installations and Equipment within the Housing Stock and Communal Areas managed by Flagship Housing Group need to be kept safe and regularly maintained.

<b>Department</b>	<i>Asset Management</i>
<b>Policy Owner</b>	<i>Head of Landlord Compliance</i>
<b>Approved Date</b>	<i>25<sup>th</sup> July 2023</i>
<b>Date for Review</b>	<i>July 2024</i>
<b>Approving Body</b>	<i>Asset Management Committee</i>
<b>Associated Legislation/Regulation</b>	The IET 18th Edition of the Wiring Regulations 2018:BS7671 Amendment 2 The Electricity at Work Regulations 1989 (EAWR) Building Regulations
<b>Equality Impact Assessment Date</b>	<i>04/07/2023</i>
<b>Version Number</b>	<i>1.0</i>

## Purpose / Principles

This Policy explains how Flagship Housing Group's commitment to Electrical Safety will be met. It will be supported by an Electrical Safety Management Plan providing more detailed guidance and procedures.

## Roles / Responsibilities

Role	Responsibilities	Frequency
Board	<ul style="list-style-type: none"> <li>• They are the responsible legal entity and must oversee the discharge of the required standards.</li> <li>• They act as Duty Holders and are accountable for ensuring the implementation of this Management Plan and the associated Policy.</li> <li>• They will receive assurance through regular performance reports that the Management Plan and Policy are being implemented and that the regulations are being fully complied with.</li> <li>• In doing so they will ensure the safety of staff, tenants, Contractors, and the wider general public has not been compromised.</li> <li>• They will also ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested third parties, informed of the regulatory landlord compliance position.</li> <li>• The Board will be responsible for ensuring that any necessary remedial action, arising from performance reports, are undertaken to comply with the Policy and ensure that a regulatory landlord compliant position is maintained.</li> <li>• Will receive Quarterly KPI reports and commentary on Electrical Safety compliance performance.</li> </ul>	6 Monthly/ Annually
Asset Management Committee	<ul style="list-style-type: none"> <li>• They will receive Internal Audit reports, and monitor the delivery of managers' actions arising, through to successful completion.</li> <li>• They will draw any concerns they may have arising from such reports to the attention of the Board.</li> </ul>	Quarterly
Chief Executive Officer	<ul style="list-style-type: none"> <li>• Retains the overall responsibility for the monitoring of the consistent implementation of this Management Plan and Policy.</li> <li>• Through the implementation of the Management Plan and Policy to effectively comply with the regulatory standards.</li> </ul>	Ongoing

	<ul style="list-style-type: none"> <li>If the regulatory standards are not maintained to report any breach in standards to the Regulator of Social Housing.</li> </ul>	
<b>Director of Strategic Asset Management</b>	<ul style="list-style-type: none"> <li>Agree and set budgets that are sufficient to meet the compliance requirements.</li> <li>Appoint/nominate sufficient resources to fulfil the Responsible Person roles for all Electrical Safety requirements and use this Management Plan to define their duties.</li> <li>Delegate appropriate authority for in-house delivery or procurement to meet the requirements.</li> <li>Ensure that the conditions of all contracts are being fulfilled either by Internal Service Provider/s or external Contractors. Will ensure the operational delivery of this Management Plan and Policy and compliance with the regulations.</li> <li>Will oversee the programme of Policy and Strategic Review.</li> </ul>	Ongoing
<b>Director Legal and Governance</b>	<ul style="list-style-type: none"> <li>Seek assurance that the regulations are being adhered to and regularly review Internal Service Provider (ISP) and/or external Contractor operational practices and performance.</li> </ul>	
<b>Head of Landlord Compliance</b>	<ul style="list-style-type: none"> <li>Will manage the strategic implementation of this Management Plan and Policy and ensure compliance with all Regulations.</li> <li>Will formulate Programmes of Work consistent with the delivery of this Management Plan and Policy.</li> <li>Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors (Internal and/or external) to address any delivery shortfalls.</li> <li>Monitor the quality and correct storage of all certification and documents required to demonstrate Landlord Compliance.</li> <li>Will provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance.</li> <li>Will implement Data Governance Protocols</li> <li>.</li> <li>Will receive audit feedback and act upon the findings.</li> </ul>	Ongoing
<b>Compliance Manager (Electrical)</b>	<ul style="list-style-type: none"> <li>Will instruct/liaise with internal operational managers and external Contractors in respect to the operational delivery of this Management Plan.</li> <li>Will liaise with Neighbourhood Management Team /Housing Team and tenants to explain the importance of compliance and the need to achieve access to complete safety checks and works</li> </ul>	

	<ul style="list-style-type: none"> <li>Managing tenant feedback (enquiries, complaints and compliments) handling and progress.</li> <li>Liaise with IT and ensure system(s) and interfaces operate effectively</li> <li>Will manage the availability of accurate Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts.</li> <li>Will oversee the preparation of the KPI/MPI and OPI reporting suite</li> </ul>	
<b>Gasway, Flagship Services and Electrical Contractors</b>	<ul style="list-style-type: none"> <li>Operational delivery of Electrical Safety Inspections to Non-Domestic and Domestic Stock.</li> <li>Operational delivery of Safety Inspections and Cyclical Maintenance to Portable Electrical Appliances, Power-Operated (Automatic) Doors Gates and Barriers, Lightning Protection Systems (LPS) and Solar PV schemes.</li> <li>Review Property addresses and reconcile with Contractor databases to ensure the programme remains accurate.</li> <li>Liaise with tenants in relation to arranging/keeping appointments.</li> <li>Liaise with the Compliance Team in relation to access issues.</li> <li>Update system(s) with accurate data in line with Data Protocols.</li> <li>Provide appropriate, complete and correct certification for all Electrical Safety works.</li> <li>Provide Quality Assurance (QA) checks in accordance with the contract.</li> </ul>	Ongoing
<b>Tenant</b>	<ul style="list-style-type: none"> <li>Agreeing to and keeping appointments to provide access.</li> <li>Liaising with Flagship Housing Group staff in relation to any poor service, failure to attend/poor repair etc.</li> <li>Provide tenant satisfaction information.</li> </ul>	As required
<b>Director Health and Safety</b>	<ul style="list-style-type: none"> <li>Deliver an internal assurance testing framework to provide assurance on operational procedures</li> <li>Provide critical friend support and advice</li> </ul>	
<b>Independent External Auditor (IEA)</b>	<ul style="list-style-type: none"> <li>Undertake 5% External Validation of Electrical Safety Inspections in line with the Management Plan.</li> </ul>	Ongoing

The key objective of this Policy is to describe how Flagship Housing Group will meet the required statutory, legislative, and regulatory requirements in relation to Electrical Safety. It will also cover how the Board, as Duty Holder, will receive assurance of statutory, legislative, and regulatory compliance.

The scope of this Policy includes Fixed Wire Testing, Portable Appliance Testing, Automated Doors, Gates and Barriers and Lightning Protection Systems.

Flagship Housing Group will comply with all current and relevant legislation and specifically as detailed in the following.

### **Testing of Fixed Wiring Systems**

- The IET 18th Edition of the Wiring Regulations 2018:BS7671 Amendment 2
- The Electricity at Work Regulations 1989 (EAWR)
- Building Regulations.

### **Portable Appliance Testing**

Section 2.2 of the Health & Safety at Work Act 1974 (HASAWA) 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**

- The HASAWA 1974 Sections 3 and 4 place a duty to ensure the health and safety of users, so far as is reasonably practicable.
- Supply of Machinery (Safety) Regulations 2008 and BSEN 12453:2001

### **Lightning Protection Systems**

Detailed in BS EN 62305:3:2011: ‘Protection against Lightning – Physical damage to structures and life hazard’ and its subsequent amendments. Section 7 and E7 of the British Standard (BS EN 62305:3:2011) sets out the requirements for maintenance and inspections of lightning protection systems.

Flagship Housing Group also acknowledges its obligations under the HASAWA 1974 and Landlord Tenant Act 1985.

In addition, as a landlord and provider of Social Housing Flagship Housing Group must meet the requirements of the Regulator of Social Housing's (RSH) Home Standard.

It is essential to ensure tenants, residents, employees and visitors remain safe in Flagship Housing Group's premises (both individual homes and offices). Failure to properly discharge our statutory, legislative and regulatory 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.
- RSH's scrutiny and potential determination of a breach of the Home Standard and serious detriment having been caused/potentially caused.
- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

### Policy

To comply with statutory, legislative and regulatory standards and obligations, and to ensure the safety of our tenants, staff, contractors and other visitors to our properties, Flagship Housing Group will:

### **Process**

Provide clear lines of responsibility for the management of Fixed Wiring Systems, Portable Appliance Testing, Powered Doors, Gates and Barriers, Lightning Protection Systems and Photovoltaic (PV) Systems supported by written guidance in the Electrical Safety Management Plan.

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 and works, which shall include legal action when required.

Proactively assess available data for relevant information about the tenant to help gain access (disability, vulnerability, local connections, etc.).

Maintain a process for dealing with unsafe situations in accordance with the regulations.

## Delivery

Will include:

- Fixed Wire Testing – Electrical Installation Condition Report (EICR).
- Portable Appliance Testing
- Automated Doors, Gates and Barriers
- Lightning Protection Systems
- Solar PV

## Fixed Wire Testing

Ensure all communal areas hold a valid Electrical Installation Condition Report (EICR) within the cycle specified by the Competent Person undertaking the test but, in any event, at intervals not exceeding 5 years.

Ensure inspections and testing of Fixed Wiring Systems within domestic properties take place on a 5-year cycle (or sooner if recommended by the Competent Person undertaking the test). Hold a valid EICR for all properties.

Ensure all domestic electrical installations are tested and certified prior to letting. If a property remains unoccupied for a period exceeding 6 months following its last test, a further EICR will be completed prior to occupation.

In addition to checking all installations maintained by Flagship Housing Group, inspect any electrical work carried out by the tenant at the same time. Any works found to be unsafe, or not complying with regulations will be disconnected and made safe appropriately at the time of inspection.

Certain tenant-own works will be allowed to be left in situ, such as light fixings and switches, which have been appropriately installed and deemed safe for continued use by the Competent Person completing the inspection. *These will be recorded on any relevant paperwork and on the Master Database.*

Prioritise remedial works arising from Fixed Wire Testing and apply a timescale for action, as detailed within the Electrical Safety Management Plan. All C1 (Immediately Dangerous) works will be resolved immediately. We will also aim to complete all C2 works (Potentially

Dangerous) at the time of the inspection and testing. **The property will only be considered compliant once evidence is provided that all C1 and C2 works are resolved.**

This information will be recorded, stored and archived on the Master Database.

### **Portable Appliance Testing**

Risk assess all appliances and equipment provided by Flagship Housing Group which are used by employees, residents, tenants, and visitors and undertake Portable Appliance Testing (PAT) at a frequency arising from the risk assessed schedule as per the Code of Practice for In-service Inspection and Testing of Electrical Equipment. Flagship Housing Group will retain appropriate documentation.

establish a cycle of subsequent re-testing at the time of the first test.

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

Detail the frequency of inspections and procedures within the Electrical Safety Management Plan, but as a minimum this will be on an annual basis. Flagship Housing Group will retain appropriate documentation.

### **Lightning Protection Systems**

Carry out inspection and testing on an 11-month rolling basis to ensure inspection and testing under different climatic conditions. Flagship Housing Group Housing Services will retain appropriate documentation.

### **Solar PV**

Work towards a program to check systems annually in accordance with the Electrical Safety Management Plan. The Compliance Team will retain appropriate documentation.

### **Additional Safety Measures**



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Require that tenant alterations should be subject to prior notification, agreement, and appropriate landlord's permission from Flagship Housing Group to proceed before they are undertaken – as is required by the Tenancy Agreement. Permission will not be unreasonably withheld.

Any unauthorised alternations will be required to be removed by Flagship Housing Group's appointed contractor at the tenant's own expense.

### **Contractors Competency**

Only engage with suitably qualified electrical contractors to undertake work on electrical installations Contractors are to be registered with The National Inspection Council Electrical Installation Contractors (NICEIC) or equivalent.

Ensure that contractors shall demonstrate that all engineers engaged in work for Flagship Housing Group shall meet the required standard of training.

Only engage with suitably qualified and competent Lightning Protection Systems specialist contractors to undertake work on Lightning Protection Systems. Contractors shall be a member of ATLAS (The Association of Technical Lightning & Access Specialists).

Require a Microgeneration Certification Scheme (MCS) accreditation for those engaged with Solar PV systems.

Carry out an assessment of all contractor competencies annually or at change of contract /contractor, as detailed within the Electrical Safety Management Plan.

### **Internal Competency**

Maintain a Skills/Training Matrix to ensure that all staff undertaking key roles within the scope of this Policy have appropriate training.

Operate a detailed Competence Framework – including regular appraisals – as part of the Electrical Safety Management Plan.

### **Data**

Maintain an up to date Master Database of all properties where we have a responsibility to provide Electrical Safety Checks and maintenance including testing of Fixed Wiring Systems, Portable Appliances, Powered Doors, Gates and Barriers, Lightning Protection Systems and Solar PV systems.

For each relevant property record and maintain up to date data confirming which of the systems and appliances within the scope of this Policy exist and do not exist and the organisation's associated responsibility.

Where a requirement exists hold data and certification relating to the last two Safety Checks and record the next due date.

Where a requirement does not exist hold appropriate evidence.

Maintain current and up to date records of remedial works for the entire portfolio which will detail all recommendations from the Fixed Wire Testing.

### EIA statement

An Equality Impact assessment was undertaken on this policy on 04/07/23 and all identified negative impacts have been mitigated.

### Training statement

This Electrical Safety policy will be trained to the Compliance Team, Asset Management Team, Flagship Services and Gasway.

### Supporting documents

This policy is supported by:

1. The Electrical Safety Management Plan
2. The Electrical Safety Operational Guidance Notes
3. The Landlord Compliance Policy

### Measuring Effectiveness

**Assurance:**

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Ensure that all persons involved with the installation, inspection and servicing of Electrical Systems and Appliances are properly trained and accredited in accordance with this Policy.

Carry out works-based assurance activities including checks on certification and post-inspection of onsite works to the level stated within the Electrical Safety Management Plan. A proportion of such checks will be carried out by our internal Electrical Compliance Managers

Set a timetable for the review of the Electrical Safety Policy and the associated Management Plan.

### **Communication**

Encourage tenants, through the provision of publicity information, to allow access to carry out EICRs, other Safety Checks, inspections, and remedial works.

### **Implementation**

This Policy is approved by Asset Management Committee and is effective from 25<sup>TH</sup> July 2023

Staff will be made aware of the Policy at priority training and a copy will be available on the Intranet and on the Board App. Where appropriate we will publish on our website.

This Policy should also be read in conjunction with the overarching Landlord Compliance Policy and the associated Electrical Safety Management Plan.

There will be training provided for all those staff involved with the operational delivery and implementation of the Landlord Compliance requirements and obligations in respect to Electrical Safety detailed within this Policy.

### **Consultation**

This Policy is based on statutory, legislative and regulatory requirements and as such consultation with tenants has not taken place. There has been consultation with Internal Teams within Flagship Housing Group.

## Monitoring Performance

The following measures will be subject to reporting:

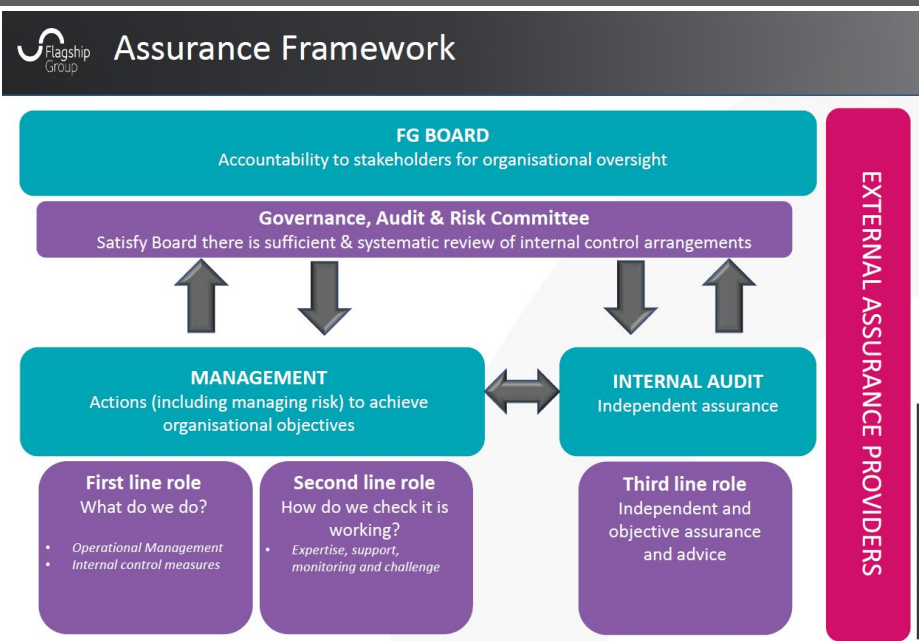
- % of Communal/Commercial Properties (against the stated Total Landlord Requirement) having a valid Electrical Installation Condition Report (EICR) within the cycle.
- % of Domestic Properties (against the stated Total Landlord Requirement) having a valid Electrical Installation Condition Report (EICR) within the cycle.
- Number of Properties with outstanding C1 or C2 works.
- % of Portable Appliance Testing (PAT) (against the stated Total Landlord Requirement) completed.
- % of Automated Doors (against the stated Total Landlord Requirement) risk assessed /serviced.
- % of Automated Gates and Barriers (against the stated Total Landlord Requirement) risk assessed /serviced.
- % of Lightning Conductors (against the stated Total Landlord Requirement) inspected and tested.

Valid certification and compliance shall mean that all immediately and/or potentially dangerous faults have been resolved.

Commentary will be provided for any properties out of date to include the date they became overdue, days overdue and their position within the access legal process to bring them back into a compliant position. Commentary will also be provided if any properties have outstanding overdue actions. Additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

A detailed PI suite will be defined within the Management Plan.

Quality Assurance (QA) activity will be undertaken using our approach of three Lines of Defence (LOD) and typically over a three-year cycle. Outcomes of the audit program will be reported via the Flagship Group H&S Committee:



### Review Period

This Policy will be reviewed annually or earlier if deemed necessary through the Performance Monitoring process.