

1. Background and objectives

- 1.1. Although the UK has a good record of electrical safety, there are still over 30 deaths and nearly 4,000 injuries from electrical accidents that occur in the home each year. A large number are related to electrical maintenance or DIY activities. The major dangers to health from electrical accidents are from shock, burns, electrical explosion or arcing, fire, and mechanical movements initiated by electricity.
- 1.2. Alliance is responsible for the maintenance and repairs to its homes and other buildings, all of which will contain electrical installations and appliances. The Landlord and Tenant Act 1985 and the Housing Act 2004 place 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.
- 1.3. Alliance is also responsible for maintaining electrical installations and equipment in non-domestic (communal blocks) and 'other' properties (offices, commercial shops, depots, etc.).
- 1.4. Alliance must establish a policy which meets the requirements for electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. In addition to this the policy must provide assurance to Alliance that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with hard wired electrical installations and electrical portable appliances.
- 1.5. Alliance must ensure compliance with electrical safety legislation is formally reported at Strategic Leadership Team (SLT) and Board level, including the details of any non-compliance and planned corrective actions.
- 1.6. The policy is relevant to all Alliance colleagues, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 1.7. The policy should be used by all to ensure they understand the obligations placed upon Alliance to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties (owned and managed).

2. Policy detail

2.1. Regulatory Standards, Legislation and Codes of Practice

- 2.1.1. Regulatory Standards – the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH).

- 2.1.2. Legislation – the principal legislation applicable to this policy is the Landlord and Tenant Act 1985; the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. Section 8 of the Landlord and Tenant Act 1985 sets out implied terms as to fitness for human habitation and Section 11 of the Landlord and Tenant Act 1985 places repairing obligations in short leases. The Electricity at Work Regulations 1989 places duties on employers to ensure that all electrical equipment used within the workplace is safe to use. The Electrical Equipment (Safety) Regulations 2016 requires Landlords to ensure that any appliances provided as part of a tenancy are safe when first supplied. Alliance is the 'Landlord' by virtue of the fact that they own and manage homes and buildings housing tenants/leaseholders through the tenancy, lease and licence agreement obligations it has with the tenants/leaseholders.
- 2.1.3. Code of Practice – the principal approved codes of practice applicable to this policy are:
- IET wiring Regulations British Standard 7671: 2018 (18th edition)
 - The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITED) 2012 (4th edition)
 - HSE INDG236: Maintaining portable electrical equipment in low risk environments (as amended 2013)
 - Electrical Safety Council Landlords' Guide to Electrical Safety 2009
 - Code of Practice for the Management of Electromechanical Care in Social Housing.
- 2.1.4. Sanctions – Alliance acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.
- 2.1.5. Customers – Alliance will use the legal remedies available within the terms of the tenancy agreement, lease or licence should any customer refuse access to carry out essential electrical safety checks, maintenance and safety related repair works.
- Non-Access: We will agree an appointment with the customer to carry out the inspections or works. If the customer is not available, on the day, or refuses access, we will agree a second appointment. If this second appointment is not kept a 'no access' process will be initiated, which may result in legal action being taken to gain access.

2.2. Additional legislation

- 2.2.1. The Electrical Inspection and Testing Policy also operates in the context of the following additional legislation:

- The Health and Safety at Work etc Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Management of Houses of Multiple Occupation (England) Regulation 2006
- Regulatory Reform (Fire Safety) Order 2005
- The Building Regulations for England and Wales (Part P)
- The Housing Act 2004
- The Occupiers Liability Act 1984
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- The Provision and Use of Work Equipment Regulations 1998
- The Construction, Design and Management Regulations 2015
- The Data Protection Act 2018
- RIDDOR 2013.

2.3. Obligations

2.3.1. The Landlord and Tenant Act 1985 places duties on landlords to ensure that electrical installations in rented properties are:

- Safe when the tenancy begins, Section 8 (1a)
- Maintained in a safe condition throughout the tenancy, Section 11 (1b).

2.3.2. In order to be compliant under these duties electrical installations are required to be periodically inspected and tested. The intervals between inspections are not absolutely set within any regulations, however, best practice guidance from the Electrical Safety Council and from BS7671:2018 states that electrical installations should be tested at intervals of no longer than 5 years from the previous inspection. Any deviation from these intervals should be at the recommendation of a suitably competent person and should be backed up by sound engineering evidence to support the recommendation; and recorded on the electrical installation condition report.

2.3.3. All electrical installations should be inspected and tested prior to the commencement of any new tenancies (void properties), mutual exchanges and transfers and a satisfactory Electrical Installation Condition Report (EICR) should be issued to the tenant prior to them moving in.

2.3.4. The Electricity at Work Regulations 1989 places duties on employers that all electrical installations and appliances within the workplace are safe and that only competent persons work on the electrical installations, systems and equipment (Section 16).

2.3.5. The Electrical Equipment (Safety) Regulations 2016 requires Landlords to ensure that any electrical appliances provided as part of a tenancy are safe when first supplied. Alliance will not be responsible for any portable electrical appliance owned by customers.

2.4. Statement of intent

2.4.1. Alliance acknowledge and accept its responsibilities regarding electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016.

2.4.2. Alliance will hold accurate records against each property it owns or manages, identifying when the electrical installation was last inspected and tested.

2.4.3. Alliance will hold accurate inspection dates and inspection records against each property it owns or manages within a designated internal system.

2.4.4. Alliance will ensure that all properties (domestic, communal blocks and 'other' properties) have a valid 'in-date' EICR, dated within the last 5 years. by no later than 30th September 2024. This is in recognition of the fact that a catch-up programme has been commissioned to ensure this is achieved.

2.4.5. Following completion of the catch-up programme, Alliance has opted to deliver a comprehensive programme of testing and inspection of all domestic properties on a rolling 5-year cycle in accordance with best practice guidance. A safety inspection will be undertaken sooner than the 5-year period if recommended by the competent person. Alliance will report on performance against a 10-year, 7-year and 5-year cycle for domestic properties enabling the SLT and Board have visibility of progress being made.

2.4.6. Alliance will deliver a comprehensive programme of testing and inspections to all communal blocks and 'other' properties (offices, depots, HMO's, etc.) on a rolling 5-year cycle, exclusive of leasehold and shared ownership properties.

2.4.7. Alliance will ensure that all electrical installations shall be safe and compliant with relevant standards following completion of an electrical installation inspection and test.

2.4.8. Alliance will ensure that a full electrical installation inspection retest is undertaken in the case of a change of occupancy (void properties), mutual exchanges and transfers and that a satisfactory EICR is issued to the customer prior to them moving in.

2.4.9. Alliance will ensure that only suitably competent in-house operatives and NICEIC (or equivalent) accredited electrical contractors and external engineers undertake electrical works for the organization.

- 2.4.10. Alliance will carry out electrical installation inspection and tests and issue new satisfactory EICRs when completing planned component replacement works within domestic properties. In the case of a rewire Alliance will receive an installation certificate and following minor works, a minor works certificate.
- 2.4.11. Alliance will periodically (and at least annually) undertake a property asset data review to ensure adequate assurance is provided that electrical safety data held against the organisation's property assets is accurate and up to date.
- 2.4.12. Alliance will have a robust process in place to gain access should any customer or leaseholder refuse access to carry out essential electrical safety related inspection and remediation works.
- 2.4.13. Alliance will ensure that robust processes and controls are in place to manage the completion of follow up works identified during inspection and testing of electrical installations.
- 2.4.14. Alliance will ensure that robust processes and controls are in place to ensure that all electrical works are properly notified and approved under Part P (as amended from time to time) of the Building Regulations for England and Wales where this is required.
- 2.4.15. Alliance will have a robust process in place to gain access to properties where customer vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the customer.
- 2.4.16. Alliance will ensure that robust processes and controls are in place to manage works to void and occupied properties that may affect existing electrical installations.
- 2.4.17. Alliance will deliver a comprehensive programme of portable appliance testing, items subject to testing are those owned and managed by Alliance such as items located in offices and communal areas.

2.5. Compliance Risk Assessment / Inspection Programmes

- 2.5.1. Risk assessment – Alliance will establish and maintain a risk assessment for electrical safety management and operations. This risk assessment will set out the organisations' key electrical safety risks together with appropriate mitigations.
- 2.5.2. CDM - to comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be completed for all void property (at the start of the contract and annually thereafter), component replacement and refurbishment works. This plan will detail any electrical installations that may be affected by the works and detail all necessary electrical work required to make safe and reinstate electrical installations including the requirement for inspection and testing.

- 2.5.3. Domestic properties - Alliance will carry out a programme of electrical installation inspection and testing to all domestic properties. This inspection and test will be carried out at intervals of no more than 5 years (unless the competent person recommends the next test must be done sooner than this). This will include the issuing of a new satisfactory EICR. This inspection and test is driven from the anniversary date of the most recent EICR which may have been carried out at the start of a new tenancy or following planned component replacement works.
- 2.5.4. Communal Blocks and 'Other' properties – Alliance will carry out a programme of electrical installation inspection and testing to all 'communal blocks' and 'other' properties (shops, offices, depots, HMO's, etc.), where there is a landlords' electrical installation (and Alliance has the legal obligation to do so). This inspection and test will be carried out at intervals of no more than 5 years (unless the competent person recommends the next test must be done sooner than this) and will include the issuing of a new satisfactory EICR. This inspection and test is driven from the anniversary date of the most recent EICR which may have been carried out following planned component replacement works.
- 2.5.5. Properties Managed by Others - Alliance will ensure they have records of a valid EICR where properties they own are managed by others (managing agents, commercial leasehold/shops). A new EICR will be requested from the managing agent prior to the existing one expiring. If the managing agent fails to carry out the electrical inspection and test, Alliance will take all reasonable steps to ensure a test is carried out.

2.6. Remedial work

- 2.6.1. Alliance will ensure there is a robust process in place for the management of any follow-up works required following the completion of a periodic inspection and test of an electrical installation.
- 2.6.2. Alliance will ensure there is a robust process in place to collate and store all EICRs and associated records and certification of completed remedial works.
- 2.6.3. Alliance will as a minimum make safe and/or where possible endeavour to repair all code C1, code C2 and code FI defects identified by a periodic electrical installation inspection and test before leaving site, after completing the inspection and testing works. Any further remedial works relating to code C1, code C2 and code FI defects will be completed within 28 working days and the relevant certification completed to document completion of works. Code C3 type works will be referred to the Electrical Manager in the Customer Safety Team for a decision.
- 2.6.4. Alliance will, when a property becomes unoccupied, assess the current installation and where the installation does not meet current standards but is in a satisfactory condition for the purposes of an EICR, a decision will be made as to whether further work to bring the installation up to a standard which meets all current requirements of BS7671

2.6.5. Alliance will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued regarding electrical safety.

2.7. Record keeping

2.7.1. Alliance will hold accurate records against each property it owns or manages, identifying when the electrical installation was last inspected and tested.

2.7.2. Alliance will hold accurate inspection dates and inspection records against each property it owns or manages within a designated internal system.

2.7.3. Alliance will establish and maintain accurate records of all completed EICRs, Minor Electrical Works Certificates (MEW) and Building Regulation Part P notifications associated with remedial works from these reports and Electrical Installation Certificates and keep these for a period of no less than 7 years.

2.7.4. Alliance will hold and maintain accurate records on the qualifications of all engineers undertaking electrical safety works for the organisation.

2.7.5. Alliance will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all electrical safety related data.

2.8. Key roles and responsibilities

2.8.1. Alliance Board will have overall governance responsibility for ensuring the Electrical Safety Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such the Board will formally approve this policy and review it every 3 (three) years (or sooner if there is a change in regulation, legislation or approved codes of practice).

2.8.2. Board will receive quarterly updates on the implementation of the Electrical Safety Policy and electrical safety performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.

2.8.3. SLT will receive reports from the Director of Business Services in respect of electrical safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.

2.8.4. The Director of Customer Services has strategic responsibility for the management of electrical safety and ensuring compliance is achieved and maintained. The Head of Customer Safety will oversee the implementation of the Electrical Safety Policy

2.8.5. The Electrical Manager will be responsible for overseeing the delivery of the agreed electrical test and inspection programme and are also responsible for the prioritisation and implementation of any works arising from the electrical testing.

2.9. Competent Persons

- 2.9.1. Alliance will ensure that the Electrical Manager, who has lead responsibility for operational delivery, is appropriately qualified; holding a recognised electrical safety management qualification. They should have or be working towards gaining the CORGI Level 4 VRQ in Electrical Safety Management. If they do not have this already, they should obtain it within 12 months of the approval of this policy.
- 2.9.2. Alliance will ensure that the Electrical Manager, who has lead responsibility for operational delivery, maintains Approved Electrical Contractor Accreditation with the National Inspection Council for Electrical Inspection Contracting (NICEIC) or equivalent for all areas of electrical inspection, testing, installation and repair works that they undertake through the in-house arrangements.
- 2.9.3. In addition, Alliance will ensure that only suitably competent NICEIC Approved Electrical contractors (or equivalently accredited) are procured and appointed to undertake electrical inspection, testing, installation and repair works to supplement the in-house team when required.
- 2.9.4. The Customer Safety Team with responsibility for delivery will check the relevant accreditations for the work that contractor and operatives are carrying out. These checks will be undertaken on an annual basis and evidenced appropriately.

2.10. Training

- 2.10.1. This policy and the procedures that support it will be subject to a range of training across Alliance and will involve all relevant stakeholders. The training will be bespoke to the individual stakeholders and refresher training will be provided as appropriate.
- 2.10.2. Training will include team briefings for those employees who need to have a basic understanding and awareness of electrical safety but who may not be actively involved in the delivery of the electrical inspection and testing policy. This will be basic electrical safety awareness training and covered in team meetings.
- 2.10.3. On the job training will be provided to those employees who will be responsible for managing the programme of electrical installation inspections and repair works to electrical installations, as part of their daily job
- 2.10.4. Regular toolbox talks will be given to operatives in the form of appropriate electrical safety training. Alliances' partner contractors will be expected to do this with their operatives and evidence this to the Head of Customer Safety on an annual basis.
- 2.10.5. Monthly meetings will be held with those involved in the management and monitoring of performance in relation to electrical safety, to brief on the current position and update and review the programme.

2.11. Performance reporting

- 2.11.1. Robust key performance indicator (KPI) measures will be established and maintained to ensure Alliance is able to report on performance in relation to electrical safety.
- 2.11.2. KPI measures will be produced and provided to the Landlord Safety Compliance Group on a bi-monthly basis and Board level on a quarterly basis. As a minimum, these KPI measures will include reporting on:

Data – the total number of:

- Properties – split by domestic properties, communal blocks and 'other' properties.
- Properties on the electrical inspection and testing programme.
- Properties not on the electrical inspection and testing programme.
- Properties with a valid 'in date' EICR. This is the level of compliance expressed as a number and a %.

Narrative - an explanation of the:

- Current position
 - Corrective action required
 - Anticipated impact of corrective action
 - Progress with completion of follow-up works
- 2.11.3. Alliance will carry out 10% audits on all work carried out in-house and by external contractors with monthly work in progress/post inspections being completed by the electrical supervisors.
- 2.11.4. Alliance will appoint a third party external independent auditor to undertake quality assurance audits on a further 5% sample of electrical works and supporting documentation.
- 2.11.5. Alliance will carry out an independent audit of electrical safety at least once every 2 (two) years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues for correction.

2.12. Non-Compliance / Escalation Process

- 2.12.1. Any non-compliance issue identified at an operational level will be formally reported to the Head of Customer Safety in the first instance.
- 2.12.2. The Head of Customer Safety will agree an appropriate course of corrective action with the Director of Customer Services to address the non-compliance issue and the Director of Customer Services will report details of the same to SLT.

- 2.12.3. The Director of Business Services and the Landlord Safety Compliance Group will provide 'independent' oversight of the programme delivered by Home Repairs Service.
- 2.12.4. The SLT will ensure the Board is made aware of any non-compliance issue so they can consider the implications and act appropriately.
- 2.12.5. In cases of a serious non-compliance issue SLT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation as part of the Regulatory Framework.

3. Equality and diversity

- 3.1. This policy is subject to a periodic Equality Impact Assessment (EIA).
- 3.2. The purpose of such an assessment is to consider the effect of the policy regarding the recognised protected characteristics of equality and ensure that it does not unfairly impact any individual or group. The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity or other grounds set out in our Equality and Diversity Strategy and Policy. Remedial action will be undertaken if a detrimental effect is identified.
- 3.3. The EIA also requires the policy author to consider whether the policy is likely to negatively impact on a person's Human Rights.
- 3.4. This policy and any other related Alliance Homes publications can be provided in other formats for those with visual, literacy or language difficulties.

4. Complaints

- 4.1. If you would like to raise a complaint in relation to this policy, you can do this by calling us on **03000 120 120** or emailing us at act@alliancehomes.org.uk
- 4.2. All complaints will be handled in line with the latest Alliance Homes Complaint Handling Policy.

5. Associated documents

- 6.1 For further information see in particular:
 - No Access Procedure
 - Court Injunction Procedure
 - Onboarding New Properties Procedure (under development).

6. Version control and approval dates

Approval stage	Date completed
Equality Impact Assessment completed	09/10/2023
EIA reviewed by specialist colleague within HR	16/10/2023
SLT review	18/10/2023
Asset Committee review	31/10/2023
Board approval	22/11/2023
Minor amend made to insert standard complaints section, non-access paragraph and format for external publication	June 2025
Next review date	22/11/2026

7. Appendices

Appendix 1 – Equality Impact Assessment

Appendix 1

Equality Impact Assessment

An Equalities Impact Assessment must be conducted alongside the review of an existing policy or the creation of a new one.

1. Name the Strategy, Policy, Procedure or Function (SPPF) being assessed and name of author.

Electrical Safety Policy – T Kent Business Compliance Manager

2. Aims of the SPPF being assessed.

- *Whose need is it designed to meet?*
- *Are there any measurable elements such as time limits or age limits?*

The aim of this policy is to safeguard customers and colleagues and to ensure compliance with legislation, regulation and guidance.

3. Who has been consulted in developing the SPPF?

- *Make reference or links to consultation/evidence documents*

A technical review by the Electrical Manager

4. Does the SPPF promote equality of opportunity?

The policy has neither a positive or negative impact on the protected characteristics as shown below, but rather ensures that all customers electrical installations are dealt with in a manner compliant with the relevant legislation, regulation and guidance.

5. Identify potential impact on each of the diversity “groups” by considering the following questions (the list is not exhaustive but an indication of the sort of questions assessors should think about):

- *Might some groups find it harder to access the service?*
- *Do some groups have particular needs that are not well met by the current SPPF?*
- *What evidence do you have for your judgement (e.g. monitoring data, information from consultation/research/feedback)?*
- *Have staff/residents raised concerns/complaints?*
- *Is there local or national research to suggest there could be a problem?*

Protected Characteristic	No impact	Negative	Positive impact	Information source/s **	Comments/evidence
Race	X				
Disability	X				
Gender	X				
Transgender	X				
Sexual orientation	X				
Religion or belief	X				
Age	X				

Marriage & Civil Partnership	X				
Pregnancy and Maternity	X				
Rural issue	X				
Social mobility	X				

Was there a negative impact identified in question 5? If yes go to question 6. if not go to question 7.

6. If “negative impact” identified in table (4) above is it?

Legal -

YES	NO
HIGH	LOW

What is the level of impact? -

If it is not legal and/or high impact – (i.e.: if you have highlighted **NO** to legal and **HIGH** to impact, then the document should be referred to Head of HR)

7. If positive impact has been identified in table 4 above, how can it be improved upon or maximised, either in this SPPF or others?

The policy aims to ensure a consistent and fair approach is taken in all cases regardless of protected characteristic.

8. Full EIA (or if you decide full EIA is not necessary but some changes should be considered)

- *Are there changes you could introduce which would make this SPPF work better for this group of people?*
- *Is further research or consultation required?*

9. Does this proposal have any potential Human Rights implications?

Electrical Safety Policy



If yes, please describe (if necessary, please refer to the Alliance Homes Group Human Rights Policy)

No.