



PA Housing

PA Housing ELECTRICAL SAFETY POLICY

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Policy Owner

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PA Housing is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats, we will provide them.

1. Policy Statement

- 1.1 The key objective of this policy is to describe how PA will manage Electrical Safety Risk as far as is reasonably practicable. This includes:
- The identification of specific responsibilities for each of its assets.
 - The creation of an Electrical Safety Management Plan (ESMP) and associated staff training to provide guidance on the implementation of the commitments contained in this policy.
 - The key activities (e.g., electrical installation condition reporting) that PA undertakes.
 - Using competent staff and contractors.
 - Communication internally and externally.
 - How the PA Board, as duty holder, will delegate responsibility for the implementation of policy, monitor its effectiveness and receive assurance of compliance.
- 1.2 The scope of this policy covers fixed electrical installations for communal and domestic properties and portable appliance testing.
- 1.3 An electrical installation consists of all the fixed electrical wiring and equipment installed beyond the electric meter in a property. It includes the cables usually hidden in the walls, floors and ceilings, accessories (sockets, switches, and light fittings), and the consumer unit (fuse box) that contains all the fuses, circuit-breakers, and residual current devices (RCDs). This policy covers the repair, upgrading, testing and inspection of all the above electrical components.
- 1.4 PA will seek to comply with all current and relevant statutory obligations, including the following where applicable:
- The Electricity at Work Regulations 1989 (EAWR).
 - The Housing Act 2004.
 - The Building Regulations 2010.
 - The Construction (Design and Management) Regulations 2015.
 - Requirements for Electrical Installation IET Wiring Regulations 18th Edition BS7671: 2018 (including all amendments).
 - IET Guidance Notes and all current amendments
 - Housing Health and Safety Rating System (HHSRS)
 - The current edition of the IET Wiring Regulations - BS7671.
 - The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.
 - Health and Safety at Work Act 1974.
 - Landlord Tenant Act 1985
- 1.5 In addition, PA must meet the requirements of both the Regulator for Social Housing's (RSH) Homes Standard and the requirements of the Care Quality Commission (CQC).

- 1.6 Our primary objective is to ensure that residents, contractors, staff, and visitors remain safe in our properties. Failure to properly discharge our legal responsibilities may also result in:
- Prosecution under the Health and Safety at Work Act 1974, or Corporate Manslaughter and Corporate Homicide Act 2007.
 - Regulatory intervention by the RSH or CQC.
 - Reputational damage.
 - Loss of confidence by stakeholders in the organisation.
- 1.7 This Policy statement establishes the broad framework for compliance with the key statutory and regulatory obligations.

2. Roles and Responsibilities

- 2.1 Detailed roles and responsibilities will be documented within the ESMP and associated Operational Guidance. The overarching roles and responsibilities are as follows:
- 2.2 The **Finance Risk and Audit Committee** will be responsible for ensuring that the PA Board receives the assurance it requires.

The **Director of Compliance** will take overall responsibility for the delivery of the Policy commitments described in the Data, Key Activities to Manage Risk and Communications sections of this policy.

The **Executive Director of Asset Management** will take overall responsibility for planning and implementing the assurance activities described in this Policy and for the effective upward reporting of performance. The **Executive Director of Asset Management** will attend the Finance Risk & Audit committee meeting and ensure that any issues arising from assurance activities are discussed, and that areas of non-performance are reported and escalated where required.

All **Directors within Asset Directorate** will take responsibility for ensuring that staff and contractors they employ have the skills, knowledge, and expertise necessary to deliver the commitments outlined in the Policy. Directors will identify Competent Person(s) (internal or external) suitable for the delivery of specific tasks.

Competent Person(s) will have a responsibility to identify any concerns about their own competency for the task that they are being asked to undertake and recommend additional competency is procured where required.

3. Management Plan

- 3.1 PA will maintain an Electrical Safety Management Plan (ESMP) and associated Operational Guidance which shall:
- Provide additional guidance on how the commitments outlined within this policy will be implemented.

- Provide clear lines of responsibility for the management of electrical safety.
 - Set out key operational processes.
 - Ensure that a clear and consistent process is in place to obtain access to properties where this is required. This will include proactive assessment of available data for relevant information about the residents to help gain access (disability, vulnerability, local connections, etc). Tenancy enforcement and/or legal action will be used where required.
 - Maintain a process for dealing with unsafe situations or incident.
- 3.2 All staff who have roles identified in the ESMP will receive associated training appropriate to their role.

4. Data

- 4.1 PA acknowledges that to meet its obligations it must maintain a robust approach to identifying the assets and components for which it has responsibility. PA will:
- 4.1.1 Maintain an up-to-date master database (within the asset management system) of all properties that will indicate both where it does and does not have a responsibility for fixed electrical wiring and portable appliance testing. This will include the identification of properties where PA has no responsibility but has an interest (e.g., a block managed by others, but PA owns a leasehold dwelling) or those where there is more than one responsible person.
 - 4.1.2 Where a requirement for fixed electrical wire testing exists, PA will hold full copies of the current and previous Electrical Installation Condition Report (EICR) along with key reportable and auditable information from the same including but not limited to: the unique property reference (UPRN); asset and installation type; confirmation that the EICR was satisfactory or appropriate remedial works undertaken; date of last test; and date of next test (as recommended by the Competent Person undertaking the test).
 - 4.1.3 Where PA has electrical appliances/equipment which are used by employees, or it has provided appliances/equipment for use by residents or visitors, PA will hold an asset register (within the asset management system) including but not limited to: UPRN; type of equipment; inspection/testing frequencies; last date completed; and next date due. Records of at least the last two completions of each activity will be held. These will generally be held electronically but there may be instances where a hard copy is kept on site and in this instance additional controls will be in place as detailed in the ESMP. In some cases, PA may gift appliance/equipment to residents, and these will not be recorded on the register where there is clear evidence that this is the case.
 - 4.1.4 Maintain current and up to date, reportable and auditable records of remedial works arising from the EICRs or any other electrical safety related inspection or testing. The records will include: UPRN; detail of the work item required; priority and target completion date; person responsible; completion date and associated sign off; and evidence of completion.

4.1.5 Where PA has no responsibility for an electrical safety activity described in this policy but has one or more residents living within a block where one may be required, PA will write to the responsible person on a five yearly basis asking for written confirmation that:

- All relevant activity - including but not limited to risk assessment, inspection, testing, remedial works, and maintenance has been undertaken by a person competent to do so and is not overdue.
- They are in full compliance with all relevant legislation.
- PA has been informed of any material issues relating to resident health and safety.

4.1.6 Where PA does not receive an adequate response, it will take reasonable steps to follow this up. Further details will be contained within the Management Plan. Records will be kept for the current and previous year.

4.1.7 The approach to data control will be documented in the Data Management Protocol and ESMP.

5. Key Activities to Manage Risk

5.1 Electrical Installation Periodic Inspection and Testing

5.1.1 The reason for periodically inspecting and testing is to check whether an existing electrical installation is safe to remain in use. The procedure identifies damage, deterioration, defects, and/or other conditions that affects electrical safety and gives rise to danger.

5.1.2 The completion of Electrical Installation Condition Reports (EICRs) provides PA with a record of the condition of an electrical installation at the time of the inspection. As such they are PA's method of assessing the risk and condition of the installation.

5.1.3 PA will undertake a suitable and sufficient EICR to all assets containing a fixed electrical installation which it is responsible for. PA will undertake EICRs prior to the date recommended by the Competent Person undertaking the previous test but, in any event, at intervals not exceeding 5 years. For occupied properties, PA will endeavour to provide the resident with a copy of the certificate within 28 days of the completed test.

5.1.4 In addition to the process described above, all domestic electrical installations are to be inspected and tested prior to reletting. If a property remains unoccupied for a period exceeding 6 months following its last test, a Competent Person will visually inspect the installation and decide if a further EICR is required. A copy of the EICR will be provided to the tenant prior to occupation.

- 5.1.5 PA will maintain an Electrical Testing Specification. This will establish the extent and limitations of the inspection and test and help to ensure that clear and consistent EICRs are produced.
- 5.1.6 Where C1, C2 or FI observations are recorded on an EICR as outstanding, the EICR will be recorded as unsatisfactory. The asset will not be considered compliant until there is appropriate evidence that the observations identified have been completed. This evidence will be in the form of an Electrical Installation certificate (EIC) or Minor Electrical Installation Works Certificate (MEIWC) which will be retained with the EICR.
- 5.1.7 For new assets or installations that have been entirely replaced, PA may hold an EIC. This would indicate the start of an installation's life, and the EIC shall state when the first EICR should take place. This would not exceed a period of 5 years in accordance with this policy.
- 5.1.8 In certain circumstances, PA may be a Building Network Operator. This is where PA owns the electrical installation between the 'intake' and the householder's installation. This is typically in a property that is split into more than one home. Where PA is the Building Network Operator it is responsible for the design, installation, and maintenance of the electrical installation past the intake point. In these circumstances, PA will record its responsibilities and undertake an EICR as described above and in accordance with the Electrical Testing Specification.
- 5.1.9 Whilst undertaking an EICR, PA may identify electrical work that has been undertaken by the occupier. Where work that does not comply with the Wiring Regulations, PA will take the appropriate action to remove or remedy the defective wiring. The cost of rectifying this will be recharged to the resident.

5.2 Portable/Moveable Appliances

PA will manage the risk posed by portable or moveable electrical appliances, used by employees or our residents (excluding appliances gifted), by undertaking a reasonable combination of user checks and combined visual inspection and testing.

5.3 Remedial Actions

In some instances, existing installations will not meet the latest Wiring Regulations. This does not necessarily mean that the installation is not safe. The EICR will include observations describing defects or items where improvement is required. The Electrical Testing Specification will establish how observations should be recorded and categorised. A summary of these along with the action PA is committed to for each category is below:

Code	Description	Action
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C1	Immediate danger present	Immediate remedial action required. Complete whilst at the property or take necessary action to make safe.
C2	Potentially dangerous	Urgent action required. Do all that reasonably practicable to resolve on same visit and if not as soon as practicable but with a backstop target of 28 days.
C3	Improvement	Recommendations will be recorded and considered as part of the next suitable planned improvement programme

Code	Description	Action
	recommended	of the next suitable planned improvement programme.
FI	Further investigation required in respect of an observation that may reveal a danger	Not generally applicable to the PA portfolio but where raised the further inspection recommended will be undertaken as soon as reasonably practicable and within a timeframe agreed by a competent person.

5.1.2 Where C1, C2 or FI observations are recorded on an EICR as outstanding, the EICR will be unsatisfactory. When the observations identified have been adequately resolved, an Electrical Installation certificate (EIC) or Minor Electrical Installation Works Certificate (MEIWC) which will be retained with the EICR.

5.1.3 All remedial actions shall have a recommended completion target. Any proposed changes to the agreed completion targets will be documented and agreed by a Competent Person.

5.1.4 All remedial work shall be conducted in accordance with the relevant British Standard, approved code of practice or associated good practice guidance.

5.6 Domestic Smoke/Heat Detection

5.6.1 In accordance with the PA Fire Safety Policy, PA will undertake a replacement programme of mains powered fire detectors. The operation of existing mains wired smoke/heat detection will be checked during an EICR and any defective or expired detectors (including those likely to expire within the next year) will be replaced.

5.7 Repairs, Maintenance and Planned Works

There is a risk that repairs, and maintenance activity unwittingly impacts electrical safety. PA will manage this risk by ensuring that R&M contractors (internal and external) have a general awareness of electrical safety to inform dynamic risk assessment when undertaking responsive repairs. Electrical repairs will be completed by a Competent Person and in accordance with the relevant British Standard, Approved Code of Practice or associated good practice guidance.

PA will ensure that it has evidence of compliance with regulations following repairs, including:

- Electrical Installation Certificate (EIC) - on completion of any new, addition or alteration to an electrical installation.
- Minor Works Electrical Installation Certificate (MWEIC) – for an addition or alteration that does not extend to a new circuit.

For planned and major works programmes PA will:

- Ensure anyone appointed to undertake design or construction activities can demonstrate the necessary competence to discharge their responsibilities relating to electrical safety.
- Request reasonable assurance that duty holders have demonstrated that resident safety can be assured during the works.
- Engage with residents on safety matters that affect them.
- Request reasonable assurance that duty holders have complied with the building regulations in relation to electrical installations where required.
- Request reasonable assurance that there is an appropriate site inspection and sign-off programme in place for the stages of the work.

5.8 Resident Commissioned Works

PA will maintain a consent process for any resident commissioned works. Approval will not be unreasonably withheld, although consent may be refused or conditions imposed where appropriate.

5.9 Management

PA will:

- Implement a risk-based approach to the periodic inspection of communal areas to ensure areas containing electrical equipment are locked and no visible signs of vandalism or damage exist.
- Maintain a clear staged no-access process to ensure access to properties to undertake electrical inspection and associated remedial works. This shall include enforcement action when required. PA will proactively assess available data for relevant information about the residents to help gain access (disability, vulnerability, local connections, etc).

6. Communication

6.1 Residents. PA will encourage electrical safety by:

- Periodically informing residents of the importance of electrical safety via website, newsletters, leaflets, and at the start of new tenancies.
- Maintaining a clear procedure for no access.

- 6.2 Staff.** Communicating key electrical safety advice to relevant staff through induction and refresher H&S training.

7. Monitoring and Assurance

- 7.1 The following KPIs will be reported to the Investment Committee and the PA Board at each meeting cycle.
- Dwellings and Non dwellings with a satisfactory EICR within its due date as a percentage of total dwellings requiring an EICR.
 - Number of assets with unsatisfactory EICR i.e., outstanding C1, C2 or FI actions.
 - Number of safety occurrences in the period, including any electrical safety incidents which posed a material safety risk and any external occurrence reporting (e.g., RIDDOR).
- 7.2 Assurance. The following assurance activity will be undertaken:
- Internal audit to provide independent assurance on the operation and effectiveness of controls. Frequency agreed as part of the Internal Audit Programme and reported to Finance Risk and Audit Committee.

8. Competence

- 8.1 For electrical work, inspection and testing PA will:
- Appoint a competent person internally or, if the skills do not exist internally, appoint an external competent person to provide retained advice and support in relation to electrical safety.
 - Ensure that it holds, or it engages with contractors who hold a current certificate covering the range of work being carried out, issued by a certification body accredited by UKAS to ISO/IEC 17065, or an equivalent (an example of this would be registration with the NICEIC, NAPIT or ECA Registered Member).
 - Ensure that any employees undertaking electrical works, inspection or testing are suitably qualified to do so in someone with the skills, knowledge, experience, and training laid out in the latest update to the Electrotechnical Assessment Specifications.
 - Get reasonable assurance that any contractor undertaking electrical work has suitably qualified staff.
- 8.2 Specific areas of competence relating to risk assessment, inspection and maintenance activity are listed within the ESMP along with a procedure outlining the reasonable steps PA will take to ensure the competence of those conducting work who are not under its direct control.

9. Consultation

- 9.1 This policy is based on legislative and regulatory requirements and as such consultation with residents has not taken place. There has been consultation with Teams within PA.

10. Policy Review

10.1 The policy will be reviewed upon any change to legislation or major guidance documentation, and at least every 36 months (or earlier if deemed necessary through the Monitoring and Assurance Process).

10.2 Monitoring and reporting

- The Director of Compliance has overall responsibility for monitoring and reviewing the operation of this policy to ensure it meets legal requirements, is fit for purpose and reflects best practice.
- All managers have a specific responsibility for operating within the boundaries of this policy and procedure, ensuring that colleagues understand what is expected of them.
- All colleagues are responsible for reading, understanding, and adhering to the policy and any questions regarding its content or application should be directed to their line manager or the HR team.

10.3 Advice and Guidance

Advice, guidance, and support will be provided by the Building Services Team to all colleagues on the Electrical Safety Policy. The policy will also be made available to all colleagues via the company SharePoint site to ensure that they are aware of its existence.