

## Electrical Safety Policy

Responsible Officer	Ian Johnson, Exec Director of Customer Services
This policy is applicable to	All companies within the Group
Approved by	Executive
Date approved	27 February 2018
Frequency of review	Annually
Date of next review	August 2025
Implementation date	March 2018
Key related documents (policy, procedure, customer literature)	All compliance documents.
Sources of best practice or guidance used in developing this policy	See section 2

Version control			
Version number (see note 1)	5	Author of Policy	Lee Richardson – Electrical Compliance Manager
Equality Impact Analysis (see note 2)	Initial/Full	Equality Analysis Date	
Privacy Impact Analysis (see note 2)	Initial/Full	Privacy Analysis Date	

Document change history		
Version	Date	Changed sections
V2	April 2019	Full review - 1,2,3,4,5
V3	April 2019	1,2,3,4,5
V4	Sept 2019	5
V5	Jan 2020	5 – removal of reference to a reconciliation between Capita and the main asset list.
V6	April 2020	Cyclical review undertaken
	April 2021	Cyclical review
V7	Feb 2023	Cover, change frequency of review.
V8	Feb 2024	Annual review – Amended to reflect change in legislation
V9	Aug 2024	Amended to include reference to our Approach to Vulnerability Policy

Consultation	
Consultation Group (if applicable)	Date of Consultation (if applicable)
Staff	Not applicable

Union(s)	Not applicable
Customers	Not Applicable
Human Resources / Organisation Development	Not applicable
Health and Safety Working Group	Not applicable
Other stakeholder (please state)	Not applicable

### **Risk policy is designed to control**

To comply with all regulatory and legislative requirements, plus ensure the safety of staff and customers.

## **1.0 Objectives of the Policy**

Karbon Homes and its subsidiary companies (hereby known as the Group) are regulated by the Regulator of Social Housing, and has responsibility for discharging the landlord obligations surrounding electrical safety testing. We are also required to undertake a monitoring role to ensure that we can demonstrate a validated landlord compliance position, thereby leading to Karbon Homes being overall compliant with legislative and regulatory requirements.

The objectives of this policy are detailed below;

- To ensure we provide a safe environment for customers, colleagues and third parties to live and/or work
- Establish the key principles that the Group will utilise to ensure electrical safety across Karbon Homes Group.
- The Group will discharge the landlord's duty specifically detailed in BS7671:2018+A2:2022 Institution of Engineering & Technology (IET) Wiring Regulations Eighteenth Edition including all amendments current at the date of any electrical testing or works, Part P and all relevant parts of the Building Regulations.
- Clarify our approach to inspections and testing that ensures recording and rectification of defects to electrical installations and circuits so that they are maintained in a safe condition so as to prevent risk of injury or death to any person.
- Ensure that all properties hold a current Electrical Installation Condition Report (EICR) and/or Domestic Electrical Installation Certificate (DEIC) (for New Build/Rewire) and all electrical installations in our properties are tested and certified prior to letting.
- Keep a record of each inspection and test report.
- Ensure that all electrical works in homes and common areas are correctly designated, tested and certified by an appropriately skilled and competent person.

- The Electricity at Work Regulations 1989 (EAWR) – No person shall be engaged in any work activity where technical knowledge or experience is necessary to prevent **danger** or, where appropriate, **injury**, unless he possesses such knowledge or experience, or is under such degree of supervision as may be appropriate having regard to the nature of the work.
  - Section 2.2 of the Health & Safety at Work Act 1974 (HSWA) 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.”
  - The Group will risk-assess appliances provided by Karbon Homes which are used by employees, residents, customers and visitors and undertake Portable Appliance Testing (PAT) on a risk assessed schedule as per the Code of Practice for In-service Inspection and Testing of Electrical Equipment.
  - To achieve electrical safety compliance in accordance with our management plan
  - Provide clear lines of responsibilities for the management of electrical safety.
  - Ensure the Electrical Safety Management Plan supports the delivery of this policy.
  - Provide a commitment to customers who are affected by electrical safety to communicate and raise awareness regarding the key issues.
  - To provide a timetable for the review of the Electrical Safety Policy and Electrical Management Plan.
  - Provide clarity of the method used for reviewing and monitoring electrical safety compliance.

This document will be stored in the Karbon Homes SharePoint for internal stakeholders and will be available to view by external stakeholders via the Karbon Homes internet portal.

## 2.0 Compliance with Regulatory Standards and Legal Obligations

The application of this policy ensures compliance with the regulatory framework for social housing in England introduced by the HCA in April 2012 which requires all housing providers to meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

The Group acknowledges and accepts their responsibilities under the 18th Edition of the IET Wiring Regulations (BS 7671:2018+A2:2022). All Electrical Installations must now be designed, constructed, inspected, tested and certified to meet the requirements of the above standard.

It is essential we ensure customers, residents, employees, contractors and visitors remain safe in our premises (both individual homes and offices). Failure to properly discharge our legal responsibilities may result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
- Prosecution by Local Authorities under the Housing Act 2004
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- HCA serious detriment judgement
- Reputational damage
- Loss of confidence by stakeholders in the organisation

This policy operates within the context of regulatory legal frameworks as follows:

- [Health and Safety at Work Act 1974](#)
- [IET Wiring Regulations BS7671:2018+A2:2022 inclusive](#)
- [Control of Substances Hazardous to Health Regulations 2002](#)
- [Management of Health and Safety at Work Regulations 1999](#)
- [Workplace \(Health Safety & Welfare\) Regulations 1992](#)
- [Control of Asbestos Regulations \(CAR\) 2012](#)
- [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations \(2013\)](#)
- [The Electricity at Work Regulations 1989 \(EAWR\)](#)
- [Landlord and Tenant Act 1985](#)
- <https://www.legislation.gov.uk/ukpga/2004/34/contents> (Housing Act 2004)
- [Occupiers Liability Act 1957 and 1984.](#)
- [Equality Act 2010](#)
- [The Construction Design and Management Regulations 2015](#)
- [BS EN/IEC 62305 Lightning Protection Standard](#)
- [The Management of Houses in Multiple Occupation \(England\) Regulations 2006](#)
- [Homes and Communities Agency Regulatory Standard \(The Home Standard\)](#)
- [All relevant Parts of Building Regulations including Parts P, B, F, L, M.](#)
- [The Code of Practice for Electrotechnical Care in Social Housing](#)

### **3.0 Scope**

This policy must always be read in conjunction with the Electrical Safety Management Plan.

This policy relates to offices, general needs housing, supported housing, sheltered housing, and other rented properties owned by the Group, communal areas including leaseholders/shared ownership, other rented housing managed by the Group on behalf of a third party, remote plant and garages (unless other parties are explicitly specified for statutory responsibility in any lease or management agreement.)

Where properties are managed on behalf of external property owner's the statutory responsibility will be detailed in the terms of the management agreement.

This policy is applicable to inspection, testing, and recording, rectification of defects and issuing of reports, so as to prevent risk of injury or death to any person.

All premises with an electrical supply will be included in the inspection programme which will include inspection of condition and repair and maintenance to ensure installations and equipment are kept in a safe condition. The inspection will be completed by an appropriately qualified, skilled person (electrically) for electrical installations and records of each inspection and test report will be kept in relation to the following;

- All electrical installations
- Portable electrical appliances
- Lightning conductors (where previously installed)
- Other electrical installations where there is a legislative requirement

## **4.0 Policy detail**

The frequency of inspections and procedures are detailed within the Electrical Safety Management Plan.

New electrical installations will comply with BS7671:2018+A2:2022 Institution of Engineering & Technology (IET) Wiring Regulations Eighteenth Edition including all amendments current at the date of the electrical works and Part P and all other relevant parts of the Building Regulations.

Each home included within the electrical upgrade programme will be upgraded in accordance with the current version of BS7671:2018+A2:2022 (IET Wiring Regulations) and Part P of the Building Regulations, resulting in the issue of either:

- A 'Satisfactory' Electrical Installation Condition Report (EICR) or
- A Domestic Electrical Installation Certificate (DEIC)

Note: In the event the Electrical Installation Condition Report overall assessment of the Electrical Installation is 'Unsatisfactory' then the appropriate Electrical Test Certification will be completed for the associated Electrical Remedial Work

Where properties are managed on behalf of external owners, responsibility is set out in the terms of the management agreement

There will be a detailed record of all attempts to gain access to carry out electrical inspection testing and repairs. If reasonable access is not provided Karbon Homes will escalate action and seek a legal or legislative remedy to ensure access is gained at the earliest possible opportunity in accordance with legislation.

We will proactively assess data for relevant information about the customer to help gain access (disability, vulnerability etc.). The process will be detailed in the Electrical Safety Management Plan.

## **Electrical Safety Commitments**

The Group Homes will work within the following commitments

- Adequate installation and upgrade programmes are carried out by competent contractors whose qualifications to undertake such work have been fully assessed.

- Ensure a 5-yearly programme (by April 2022 and subject to access) of EICR electrical installation testing as a minimum for workplaces, common areas, dwellings, sheltered and supported housing schemes and Houses in Multiple Occupation.
- Risk-assess appliances provided by Karbon Homes for work use, and also which are provided or permitted in communal/common areas. Items will be PAT tested on a schedule and risk assessed as appropriate.
- Ensure that all properties hold a current EICR and /or an Electrical Installation Certificate and all electrical installations are tested and certified prior to letting.
- Only use operatives and contractors employing appropriately qualified and skilled persons who are registered with the NICEIC
- All activities will be subject to compliance with the General Data Protection Regulations 2018.

### **Property Classification.**

- All Group properties will be categorised in an electronic system such as the Capita system according to their potential to have an electrical supply installed.

### **Record Keeping**

- The requirement whether to undertake an electrical safety visit or not will be held within spreadsheets, free standing databases or Capita. The long term plan is to move all such data onto Capita.
- All records relating to the EICR shall be kept for a minimum of 10 years or until the Electrical Installation is updated and/or renewed. PAT testing certification will be kept for a period of 6 years.
- Certificates associated with inspection and testing will be held in an electronic and paper document management system and shall be made available to the customer(s) of the premises if requested.
- Electrical appliances owned by Karbon Homes will be repaired and maintained to approved current standards
- We will carry out regular validation checks of the main Capita database to ensure all properties are correctly classified.
- A full Electrical Installation Certificate and/or Electrical Installation Condition Report (EICR) for new or changed status properties will be completed at the time of recording on Capita, such changes will include:
  - New Property Acquisitions
  - New Build
  - Refurbishment
  - Change of Tenancy or Tenure (any reason).

### **Contractors Competency**

Karbon Homes has responsibility to ensure that operatives and contractors are competent and the following controls will operate to ensure competence can be demonstrated.

- Only suitably qualified electrical operatives and contractors shall be engaged to undertake work on electrical installations. The National Inspection Council Electrical Installation Contractors (NICEIC) offer an industry recognised standard of training for engineers. It is required that contractors shall demonstrate that all engineers engaged in work for Karbon Homes shall meet the respective standard of training offered by NICEIC or similar.
- Contractor accreditations and operative qualifications will be monitored and updated during each contractor progress meeting to ensure accuracy and a validation audit will be undertaken annually.

The Group's organisational commitment to health and safety is set out in our Health and Safety Policy.

### Internal Competency

The Group will ensure that all colleagues undertaking key roles within the delivery and management of this area will have access to training and support applicable to their roles.

As part of the Electrical Safety Management Plan a detailed competence framework will operate including regular appraisals.

## 5.0 Monitoring

**Karbon Homes Board** will act as Duty Holder and will receive regular reports on the performance of this policy and are accountable for ensuring its implementation.

The **Karbon Board** and **subsidiary company Boards** will receive regular summary reports in relation to the implementing of this policy and be responsible for ensuring Karbon Homes undertake any necessary remedial action to comply with the policy.

**Karbon Homes Chief Executive** will retain the overall responsibility for the monitoring of the consistent implementation of this policy.

**Director of Property Services** – shall appoint /nominate a Principal Duty Holder (Electrical) within Karbon Homes. The duties are detailed in the Electrical Safety Management Plan.

Monthly reports will be generated for designated senior managers direct from the Capita databases to ensure compliance can be monitored against minimum agreed Performance Indicators. These will be detailed in the Management Plan. The Audit and Risk Committee (3 monthly) and Board (six monthly) will receive high level KPIs as follows:

- % of Properties with a completed and in date Commercial Periodic Electric Inspection Condition report
- % of Properties with a completed and in date Domestic Periodic Electric Inspection Condition report
- % of buildings with equipment where Portable Appliance Testing has been completed

Commentary will be provided for any properties out of date.

The production of monthly performance reports to enable managers in all teams to monitor progress against agreed targets.

This service area will be included within the annual Internal Audit programme which will review in particular adherence to process, data and record keeping.

The Group have a specialist team of Electrical Compliance Officers who inspect, monitor and report on the technical performance and quality of the electrical work carried out by in-house operatives and external contractors.

In addition, the Group will seek additional independent quality assurance to ensure we can robustly demonstrate electrical safety compliance by using the National Inspection Council for Electrical Installation Contractors (N.I.C.E.I.C) to ensure the internal inspection regime of this business critical service area. The N.I.C.E.I.C will carry out an annual audit on Karbon Homes' electrical safety compliance.

Electrical safety is a high risk area and this policy will be reviewed on an annual basis.

## 6.0 Glossary of Terms

- **The National Inspection Council Electrical Installation Contractors (NICEIC)** or the Electrical Contractors Association (ECA) offer an industry recognised standard of training for engineers.
- **ECA** - The Electrical Contractors' Association is the main trade association for contractors involved in electrical engineering projects in England, Northern Ireland and Wales.
- **Health and Safety Executive (HSE)** –Non-departmental public body in the United Kingdom responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare, and for research into occupational risks in England and Wales and Scotland
- **Environmental Protection Orders (EPO's)** – This is an order written statutory tool issued by the Department of Environment and Heritage Protection (the department) to a person or company to undertake specific actions within specific timeframes to remedy a risk or prevent further harm.
- **Business Continuity Plan (BCP)** – Plan that deals with Karbon Homes Housing Groups response in managing an emergency situation that affect the function of the organisation.

## 7.0 Equality and Diversity

This policy is implemented in line with the Group's Equality and Diversity Policy and associated legislation.



Consideration will be given to all protected characteristics under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations.

This policy and associated documents are available in different languages and alternative formats where necessary.

## **8.0 Data Protection and Privacy**

We have a clear policy on data protection and sharing data with other partners/outside agencies under the requirements of the Data Protection Act 1998. This is clearly set out in our Data Management Policy which, along with the supporting Data Management Guidelines, must be followed throughout the operation of this policy.

## **9.0 Approach To Vulnerability Policy**

This policy is applied in line with Our Approach To Vulnerability Policy. Everyone matters.

We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services. We will offer support, reasonable adjustments, and adaptations to remove barriers. We will discuss with our customers what is reasonable and appropriate.

In delivering this service we may need to escalate a particular case – if we do then customer vulnerabilities will be considered as part of the decision-making process.

We will support people with vulnerabilities to deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people with vulnerabilities in the delivery of our services but also to ensure we meet our statutory and regulatory requirements as a social landlord.

Details are provided in the appropriate areas in this policy.

All our customer policies are available on the website.