

**ROTHERHAM METROPOLITAN  
BOROUGH COUNCIL**

**HOUSING SERVICES ELECTRICAL  
SAFETY POLICY**

**NOVEMBER 2024**

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## 1 INTRODUCTION

The health and safety of tenants, residents, visitors, staff, and contractors is of paramount importance to the Council. The risk of electrical fire, shock and even electrocution presents a significant hazard to the safety of buildings and their occupants, and it is imperative that there are robust management and early warning systems in place to significantly reduce risks.

The key objective of this policy is to ensure that Council, employees, partners, and tenants are clear on the Council's legal and regulatory electrical safety obligations in respect of housing assets. This policy provides the framework all key stakeholders will operate within to meet these obligations.

The delivery of this policy is an integral part of the Council's holistic management of electrical safety across its portfolio of assets as detailed within the Council's Corporate Health and Safety Policy.

## 2 SCOPE

This policy aims to demonstrate that the Council has relevant measures in place to comply with the Housing Act 2004, Landlord and Tenant Act 1985, Homes (Fitness for Human Habitation) Act 2018, Electrical Equipment (Safety) Regulations 2016.

This policy also operates within the context of additional legislation (see Appendix A).

It covers assets within the responsibility of the Council's Housing Service, including residential properties, neighbourhood centres, garages and boiler houses but does not apply to managing electrical safety within non-Council owned dwellings or other Council assets such as schools, care homes, offices or commercial properties.

This policy applies to all employees who are involved with the management and maintenance of housing services including contractors or visits to buildings for the purpose of carrying out their work duties, and is underpinned by the following principles:

- Ensuring compliance with legal and statutory requirements.
- Ensuring, as far as it reasonably possible, that electrical risks are minimised.
- Ensuring all electrical and mechanical equipment on the Council's estate is regularly maintained, and records kept in line with legal requirements. This includes in respect of cyclical servicing and inspections of electrical installations.

### 2.1 Guidance and codes of practice

The principal guidance and codes of practice applicable to this policy are:

- Inspection and Testing of Electrical Equipment Wiring Regulations British Standard 767:2018 (18<sup>th</sup> edition amendment 3).
- Code of Practice for the Management of Electrotechnical Care in Social Housing (Electrical Safety Roundtable) January 2019.
- The code of Practice for In-Service Inspection and Testing of Electrical Equipment (IET) 2020 (5<sup>th</sup> edition).

## 2.2 Regulatory standards

The Council will comply with the Regulator of Social Housing's Consumer Standards for social housing in England.

The Housing Act 2004 requires that properties are free from Category One Hazards, Housing Health and Safety Rating System (HHSRS), which includes electrical hazards.

The landlord and Tenant Action 1985 and the Homes (Fitness for Human Habitation) Action 2018 place duties on landlords to ensure that electrical installations in rented properties are:

- Safe when the tenancy begins
- Maintained in a safe condition throughout the tenancy so the property is fit for habitation.

To comply with these duties, electrical installations are required to be periodically inspected and tested. There is no legal requirement setting out how frequently we must carry out inspections and tests in domestic properties, however, the Government is consulting on introducing mandatory checks on electrical installations for social housing at least every five years.

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.

## 3 THE COUNCIL'S APPROACH TO MANAGING ELECTRICAL SAFETY

The Council has a range of measures in place to manage electrical safety within its properties. The compliance management matrix details all compliance activity, frequency of testing, and how the Council meets its statutory and regulatory obligations. This includes:

- Domestic electrical installation condition report.
- Non-domestic electrical installation condition report.
- Smoke detectors.
- Automatic doors, gates and barriers.
- Emergency lighting.
- Portable appliance testing.
- Lightning protection.

### **3.1 Electrical installation condition reports (EICR)**

A programme of electrical installation inspection and testing is carried out to all domestic, communal areas and neighbourhood centres at least once every five years (unless the competent person recommends the next test must be done sooner than this), upon commencement of a new tenancy or following planned component replacement works.

### **3.2 Smoke detectors**

As part of the annual gas safety check, or at void stage, the engineer will check smoke detectors and carbon monoxide alarms are working correctly. A new detector and/or alarm will be fitted if faulty or missing.

### **3.3 Automatic doors, barriers, and gates**

Automatic doors are checked and serviced every six months and a certificate of safety provided by the specialist contractor confirming the doors meet British Standard EN 12453.

### **3.4 Emergency lighting**

Emergency lighting is tested by accredited electricians every six months. Any defects are noted and actioned within appropriate priorities.

### **3.4 Portable appliance testing (PAT)**

Any portable equipment (electrical equipment which does not form part of the fixed system is considered to be an electrical appliance). PAT is undertaken by a competent person at intervals dependent upon level of risk. This includes items provided within furnished tenancies and in neighbourhood centres. It does not apply to tenants' own equipment.

### **3.5 Lightning protection**

Lightning protection is tested and certified annually by a specialist contractor and a certificate of compliance held.

### **3.6 Follow-up work**

- The Council will endeavour to repair all Code One (C1) and Code 2 (C") defects and Further Investigations (Fis) identified by an electrical installation inspection and test at the time of the check, to produce a satisfactory EICR. Where this is not possible, we will make the installation safe and return to complete the required remediation works within 28 days where reasonably practicable to ensure a satisfactory EICR is produced.

- Where C2 defects have been repaired after the inspection date, they will be recorded on a Minor Works Certificate which will be appended to the unsatisfactory EICR deeming the installation satisfactory.
- The Council will review all Code 3 (C3) observations and determine the most appropriate course of action.

### 3.7 Testing and servicing schedule

ELECTRICAL ACTIVITY	FREQUENCY
Electric domestic EICR	5 years
Electric non-domestic EICR	5 years
Electric automatic doors	6 months
Electric automatic gates and barriers	6 months
Electric emergency lighting service	Annually
Lightning protection	Annually

### 3.8 Risk assessment and key controls

- The council operates effective contract management arrangements with the partnering contractors responsible for delivering the service, including ensuring contracts and service level agreements are in place, conducting client-led performance meetings and ensuring that contractor, employee, and public liability insurances are up to date on an annual basis.
- The council maintains a risk assessment for electrical safety management and operations, setting out its key electrical safety risks and appropriate mitigations.
- To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) a Construction Phase Plan will be in place for all repairs work to void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement and refurbishment works.
- The Council addresses meter tampering when discovered during routine, cyclical or programmed electrical maintenance.
- The Council investigates and manages all RIDDOR notifications submitted to the HSE in relation to electrical safety and will take action to address any issues identified and make appropriate adjustments from lessons learned.

### 3.9 Procedures for access

The Council will send an appointment letter for the domestic electrical safety test two months before the five-year anniversary of the previous test. The appointment will be on or around two weeks from the date of the appointment letter and will provide details for rearranging the appointment if the auto generated appointment is inconvenient. A further appointment letter will be sent if the engineer is unable to access and complete the electrical safety test.

The Council will operate a robust enforcement process. Following three consecutive failed access attempts, the Council will use the legal remedies available within the terms of the tenancy agreement, to gain access to the property to carry out the work.

Where vulnerabilities are known or identified, the Council will safeguard the wellbeing of the tenant.

### **3.10 Data and records**

- The Council will maintain a core asset register of all properties with component and attribute data against each property to show electrical safety check requirements.
- The Council will operate a monthly data reconciliation process to manage all changes to stock, including property acquisitions and disposals.
- The Council will maintain accurate records against each property;
  - Inspection dates
  - EICRs
  - Minor electrical works certificates
  - Electrical Installation Certificates and Building Regulation Part P notifications associated with remedial works

### **3.11 Competent persons**

- Only suitably competent NICEIC, or equivalent, electrical contractors and operatives will undertake electrical works on behalf of the Council.
- We will check that Council contractors hold the relevant qualifications and accreditations when procured, and thereafter, on an annual basis.

### **3.12 Training**

The Council will deliver training on this policy and the procedures that support it, through appropriate methods, including team briefings, basic electrical safety awareness training, and on the job training for those delivering the programme of electrical testing, planned maintenance and repair works as part of their daily job. All training undertaken by staff will be formally recorded.

## **4 EQUALITY, DIVERSITY, AND INCLUSION**

The Council will ensure electrical safety advice is provided to all tenants and is accessible including providing, if appropriate, the information in braille, large print, audio, or alternative languages. In addition:

- The Council will respond appropriately to meet the needs of tenants who share information regarding a disability or vulnerability and will ensure reasonable adjustments are made to complete electrical testing and maintenance.
- The Council considers excellent communication essential in the effective delivery of electrical safety programmes and will establish a strategy to enhance communication to support tenants' understanding of electrical safety. This will encourage and support tenants to report any concerns about electrical safety and help the Council to engage with vulnerable and hard to reach tenants.



- The Council will share information clearly and transparently and will ensure that information is available to tenants via regular publications and information on the Council's website.
- The Council acknowledges the impacts of energy poverty and will ensure a robust process is in place to support and/or direct tenants to bodies able to offer professional advice.

## **5 AUDIT, COMPLIANCE, AND REVIEW**

### **5.1 Quality Assurance**

The Compliance Officer will regularly review process, performance and undertake quality assurance checks to monitor delivery against the policy with oversight by the Compliance Manager and Head of Housing Property Services, this includes monitoring the following:

- 10% random desktop sample of all electrical certification.
- 100% certification checks by compliance management system.
- 2.5% field checks of all categories of electrical compliance.
- 20% of all new installations.

### **5.2 Managing Performance**

Performance and progress against key performance indicators will be reported regularly to the Senior Management Team and at least quarterly to Senior Management Team and the Cabinet Member via the Housing Compliance Scorecard.

- Communal properties having a valid Electrical Installation condition Report (EICR) within the cycle (100%)
- Domestic properties having a valid Electrical Installation Condition Report (EICR) within the cycle (100%)
- Properties with outstanding C1 actions (0%)
- Properties with outstanding C2 actions exceeding one calendar year since test date (0%)
- Automated doors checked/serviced (100%)
- Automated gates and barriers tested/serviced (100%)
- Lightning conductors tested (100%)
- Properties with a smoke detector (100%)
- Number of RIDDOR notifications to the HSE with regards to electrical safety (0%)



### 5.3 Document Control/Revision History

This policy will be reviewed annually or before if changes in legislation or regulatory require an earlier review.

DATE APPROVED	18 November 2024
REVISION DATE	November 2027

Version no.	Date	Authorisation route	Summary of changes
	24/09/2024	DLT	Formatting, typos, aligning information with TSMs/KPIs
	07/10/2024	SLT	
	22/10/2024	IPSC	
	18/11/2024	Cabinet	

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## APPENDIX

This policy also operates within the context of the following legislation:

- Health and Safety at Work Act 1974
- The Occupiers' Liability Act 1984
- Workplace (Health, Safety and Welfare) Regulations 1992
- Regulatory Reform (Fire Safety) Order 2005
- Provision and Use of Work Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Corporate Manslaughter and Homicide Act 2007
- Data Protection Act 2018
- Building Regulations 2010 (England and Wales) – Part P
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Defective Premises Act 1972

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