



Electrical Safety Management Policy

Date of approval	29th July 2024
Responsible director	Paul Butterworth Executive Director of Assets
Policy monitoring body	WCHG Board
Resident input into policy	Equality Impact Assessment Panel Review
Date for policy review	July 2027
Linked strategies/policies	<ul style="list-style-type: none"> Asset Management Strategy Carbon Reduction Strategy Repairs and Maintenance Policy Fire and Building Safety Policy Empty Homes Policy Gas and Heating Safety Policy Continuous Performance Engagement Policy Growing Talent Through Professional Development Data Protection Policy
Statutory and Legal Framework	See Section 2 and Appendix 1
Version/date	V6 10th July 2024

Electrical Safety Management Policy

1. Background

- 1.1. Wythenshawe Community Housing Group (WCHG/The Group) is committed to delivering all landlord responsibilities, including the maintenance and repairs to homes, communal blocks, and other properties we own and manage. This policy ensures that all electrical installations are safe and properly maintained.
- 1.2. The Electrical Safety Management Policy supports delivery of the Groups' strategic plan and is specifically linked to the Great Places strategic theme. This includes the building safety and compliance objectives to ensure customers live in safe, well maintained, and compliant homes.

2. Legislation, Guidance, Regulatory Standards and Sanctions

- 2.1. **Legislation** – The principal legislation applicable to this policy is:

- Housing Act 2004.
- Landlord and Tenant Act 1985.
- Homes (Fitness for Human Habitation) Act 2018.
- Electricity at Work Regulations 1989.
- Electrical Equipment (Safety) Regulations 2016.

Additional legislation relevant to this policy is included at Appendix 1.

- 2.2. **Guidance and Codes of Practice (ACoP)** – the principal guidance and codes of practice applicable to this policy are:

- ACoP L56 – Safety in the installation and use of gas systems and appliances (5TH INDG236 - Maintaining portable electrical equipment in low-risk environments (as amended 2013).
- IET Wiring Regulations British Standard 7671:2018 (18th edition).
- 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 (5th edition).

- 2.3. **Regulatory Standards** - We will comply with the Regulator of Social Housing regulatory framework and consumer standards for social housing in England. The Safety and Quality Standard is the primary one applicable to this policy.

- 2.4. **Sanctions** – Failure to discharge our responsibility and obligations properly could lead to prosecution under the:

- Health and Safety at Work Act 1974.
- Corporate Manslaughter and Corporate Homicide Act 2007.
- Principal legislation listed in paragraph 2.1 above, and via.
- Regulatory judgement from the Regulator of Social Housing.

3. Risk Management

- 3.1. The WCHG Board annually review the Corporate Risk Register and agree the risk appetite for each one.
- 3.2. The WCHG Audit and Risk Committee is responsible for overseeing the management of corporate risks associated with this policy.
- 3.3. The Head of Repairs and Head of Assets are responsible for the day to day management and mitigation of risk.
- 3.4. The specific risks associated with this policy are:

GP2 Failure to meet asset compliance in line with regulatory standards'

GP5 Repairs, maintenance and environmental services fail to meet/exceed regulatory/legal requirements.'

- 3.5. The risk appetite set by the Board is 'Averse', defined as 'avoidance of risk and uncertainty as a key organisational objective. The key focus of the Board is that regulatory compliance continues to be achieved, and the Regulator of Social Housing Standards and Consumer Standards are met.
- 3.6. We will maintain a suite of procedures and processes, and provide adequate resources to implement them, to mitigate the risk of service delivery failing to adhere to this policy.

4. Scope

- 4.1. This policy covers the following assets:
 - WCHG tenanted, and empty domestic properties
 - Communal areas used to access customers' homes
 - Offices depots, community centres, and other working environments managed or owned by the group.
 - All fixed wire electrical installations, equipment and appliances installed by WCHG E.G. Fire alarms, lifts, laundry equipment, portable appliances, water pumps, CCTV installations, door entry systems etc. (See Appendix 2 for a summary and servicing cycles in place to maintain electrical installations)
- 4.2. This policy covers the following services:
 - Investment work activities.
 - Planned and cyclical work activities.
 - Empty homes activities.
 - Other general gas work activities such as repairs.
- 4.3. This policy applies to the following:
 - All WCHG colleagues.
 - All contractors and third parties working on our behalf.

- 4.4. Leaseholders are responsible for all electrical installations within their home in accordance with the terms of their lease.
- 4.5. All customer owned electrical appliances are excluded from the scope of this policy.
- 4.6. The installation, testing, inspection, repair and replacement of smoke and carbon monoxide alarms is covered within the Gas and Heating Safety Policy.

5. Commitments and obligations

- 5.1. In line with our obligations set out in Section 2 and Appendix 1, under this policy WCHG will:
 - 5.1.1. Ensure properties and any appliances provided are safe at the start of every tenancy or applicable lease.
 - 5.1.2. Maintain all properties in a safe condition and deliver repairs in line with the WCHG Repairs and Maintenance Policy, so that they are fit for habitation throughout the tenancy.
 - 5.1.3. Compete periodic inspections of electrical installations every five years. This programme will be aligned to internal refurbishment work to maximise value for money and minimise disruption for customers.
 - 5.1.4. Inspect buildings that are accessible to the public every year.
 - 5.1.5. Inspect and test all electrical installations and provide a valid and satisfactory Electrical Installation Condition Report (EICR) before any tenancy commences. This includes testing all properties handed over for occupancy and management, void properties, and when mutual exchanges and transfers occur.
 - 5.1.6. Provide the incoming customer with a valid and satisfactory EICR when they move in.
 - 5.1.7. Ensure that all electrical installations and appliances within the workplace are safe and only competent persons work on the electrical installations, systems and equipment.
- 5.2. WCHG will retain documentation for all safety checks carried out for the lifetime of the installation. Documentation will be removed once a complete rewire is carried out.
- 5.3. WCHG keep a record of each installation renewal and repair for a minimum of six years.
- 5.4. WCHG will not renew or replace electric fires that serve as secondary heating. Repairs to existing electric fires will be completed if economically viable to do so. (As a guide this means if parts are available and the repair costs less than £100 plus VAT).

- 5.5. Customers can apply through the Customer Alteration Scheme for permission to fit their own electric fire. If permission is given the tenant is responsible for all servicing and repairs.
- 5.6. WCHG will provide new electrical heaters when the main heating system is not available due to breakdown and a temporary source of heating is required. The heaters and instructions for use will be left with the customer, free of charge, and will become their responsibility.
- 5.7. In support of our Carbon Reduction Strategy and the commitment to support customers, we will provide energy efficient lighting installations across all homes, communal areas and emergency lighting systems.
- 5.8. We will update our asset database with all electrical installation, servicing and testing data, and use the data to inform financial planning to support the delivery of maintenance and renewal programmes.
- 5.9. We will take all necessary steps to gain access in order to complete all electrical inspection work. This includes tenancy enforcement actions up to and including legal action, and the potential to recharge customers for the cost of legal action.

6. Significant Non - Compliance and Escalation

- 6.1. WCHG defines significant non-compliance as, any incident that has the potential to result in a possible breach of legislation or regulatory standard; or causes a risk to health or safety, and needs to be managed as an exception to routine processes and procedures.
- 6.2. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of an WCHG employee becoming aware of it.
- 6.3. Any non-compliance issue identified at an operational level will be formally reported to the Executive Director of Assets, who will agree an appropriate course of corrective action with the Mechanical & Electrical Manager and report details of the same to the Group Leadership Team (GLT).
- 6.4. In cases of serious non-compliance, GLT and the WCHG Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.
- 6.5. We will investigate and manage all RIDDOR¹ notifications submitted to the Health and Safety Executive in relation to electrical safety, and will act to address any issues identified or lessons learnt, to prevent a similar incident occurring again.

¹ RIDDOR is the abbreviation for Reporting of Incidents, Diseases and Dangerous Occurrences Regulations

7. Quality Assurance

- 7.1. WCHG will ensure delivery of an annual programme of third-party quality assurance audits of electrical safety checks. This will be:
- 100% of all new installations including rewires, partial, full and consumer unit upgrades.
 - 3 field checks per electrical operative annually.
 - 100% of all certificates including Electrical Installation Certificates, (EIC's) Electrical Installation Condition Reports (EICR's), and Minor Works Certificates (MWC's).
- 7.2. In addition, we will internally conduct:
- 25% desktop audits of all Contractor EICR'S.
 - 100% desktop audit if all in-house EICR's.
 - 100% desktop audit of all Empty Homes electrical documents.
 - 10% of MWC's completed in house and by contractor.
 - 2 field checks annually per in house electrician.
- 7.3. We will carry out an independent audit of electrical safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

8. Performance Measurement, Monitoring and Review

- 8.1. We will use a range of key performance indicators (KPI) to monitor and report performance against electrical safety. Electrical safety is not specifically covered by Tenant Satisfaction Measures (TSMs), but we adopt the same approach to ensure consistency of reporting with other compliance areas.
- 8.2. The WCHG electrical safety performance will be reported internally as follows:

Monitoring Body	Frequency
WCHG Board	Every meeting – bi monthly
Group Leadership Team	Every Meeting - monthly
CX Committee	Every meeting – bi monthly

- 8.3. Performance reporting to all monitoring bodies will be a snapshot position on the last day of the month. Access to live daily data is available to all colleagues with strategic and operational responsibility for electrical safety, through our performance management system.

8.4. The measures reported will include but are not limited to:

Data - The total number of:

- WCHG Properties split by category (domestic, communal, commercial/others).
- Properties on programme split by category.
- Properties not on programme.
- Properties with a satisfactory and in date EICR.
- Properties without a satisfactory and in date EICR.
- Properties due to be serviced within the next 30 days.
- Follow on work arising from the programme (in time and overdue).
- RIDDOR notifications to the HSE about electrical safety.
- Non-compliance incidents relating to electrical safety.

Commentary to explain:

- Current position.
- Corrective action required.
- Progress with completion of follow-up works.

9. Customer engagement

- 9.1. We recognise the need to provide customers with effective communications to support our delivery of electrical safety. We will use a range of mechanisms to maximise customer access for electrical safety checks including letters, phone calls and one to one support for vulnerable and hard to reach customers.
- 9.2. In line with the Social Tenant Access to Information Requirements (STAIR's), we will always share information that you are entitled to clearly and transparently. We will make it available to customers through regular newsletters and our external website.


10. Roles and Responsibilities

- 10.1. The WCHG Board is responsible for setting and approving the priorities of this policy and ensuring it is fully implemented to ensure full compliance with legislation and regulatory standards. They will formally review and approve it every three years, or sooner if there is a change in legislation or regulation.
- 10.2. The Group Leadership Team are responsible for monitoring that compliance against this policy is being achieved.
- 10.3. The Health and Safety Committee receive and review performance data related to the delivery of this policy and report to the Audit and Risk Committee. The Audit and Risk Committee review assurance reports on the delivery of this policy.
- 10.4. The Customer Experience Committee receive and review performance data related to the delivery of this policy.

- 10.5. The Executive Director of Assets has strategic responsibility for the management of electrical safety and ensuring compliance is achieved and maintained. They oversee the implementation of this policy.
- 10.6. The Executive Director of Assets has been appointed as the Health and Safety Lead under the requirements of the Social Housing Regulation Act 2023.
- 10.7. The Head of Repairs and Head of Assets is responsible for the operational delivery, management and monitoring of this policy.
- 10.8. The Mechanical and Electrical Manager has operational responsibility for electrical safety and the delivery of these programmes.
- 10.9. The Facilities Manager has responsibility for delivering the electrical safety servicing programmes as stated in Appendix 2.
- 10.10. The Wythenshawe Works technicians and a range of approved sub-contractors are responsible for the delivery of services within the scope of this policy.
- 10.11. The Living Well Team will support Wythenshawe Works teams to gain access to properties in order to maintain gas safety compliance. This includes taking legal action when required.

11. Competence, Training and Professionalism

- 11.1. WCHG is committed to realising the capability and potential of colleagues by investing in them through learning, training and professional study. Line managers will use the WCHG Continuous Performance Engagement process to ensure that mandatory training and required qualifications are maintained and kept up to date for all colleagues involved in the delivery of this policy
- 11.2. Our Board is recruited to meet the requirements of the governance skills matrix to ensure appropriate strategic control and oversight is provided across the Group's operations. Members receive regular and ongoing training to ensure skill and competency levels are maintained.
- 11.3. The Executive Director of Assets and the senior management team holds or is working towards the Chartered Institute of Housing Level 5 Diploma in Housing, or equivalent.
- 11.4. The Mechanical and Electrical Manager operational lead will hold the Level 4 VRQ in Electrical Safety or Level 4 VRQ Diploma in Asset and Building Management (or equivalent). If they do not have these already, they will obtain them within 12 months of the approval of this policy.
- 11.5. The Electrical Manager with operational responsibility will maintain 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.

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- 11.6. All operational electricians (internal or external) will maintain the National Inspection Council for Electrical Installation Contracting Accreditation (NICEIC), or equivalent.
 - 11.7. Only suitably competent NICEIC (or equivalent) third party technical auditors will undertake quality assurance checks.
 - 11.8. We will check our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor's certification appropriately.
 - 11.9. We will deliver training on this policy and its supporting procedures through mechanisms including but not limited to:
 - Team Meetings
 - One to one meeting
 - On the job training
 - Toolbox talks.

12. Data Protection

- 12.1. Any personal data collected under the Electrical Safety Policy will be treated with respect and used in line with the data protection laws - the UK General Data Protection Regulation (UK GDPR) and Data Protection Act (DPA) 2018. For further information on how we handle your personal data, and how you can exercise your information rights, please visit our [Group privacy notice](#).

13. Equality Diversity and Inclusion

- 13.1. WCHG are committed to providing excellent customer services, which are fair, equitable and inclusive. We are committed to making our process' accessible and easy to use for all our customers in line with our statutory duties and our commitment to Equity, Diversity, and Inclusion.
- 13.2. If you require this policy in a different format, translated, large print, easy read, braille, or an audio copy, contact us by phone on: 0300 111 0000 or: 0800 633 5500 or by email: inclusionanddiversity@wchg.org.uk.
- 13.3. A screening document for this policy has been completed and reviewed by the Equality Impact Assessment (EIA) Panel. Following this review, a full EIA was not found to necessary.

Appendix 1 Legislative and Regulatory Framework

This policy takes account of WCHG's obligations related to:

- Defective Premises Act 1972
- Health and Safety at Work Act 1974
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- The Occupiers' Liability Act 1984
- Workplace (Health, Safety and Welfare) Regulations 1992
- Pipelines Safety Regulations 1996
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Gas Safety (Management) Regulations 1996 (as amended)
- Provision and Use of Work Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Pressure Equipment (Safety) Regulations 2016
- Pressure Systems Safety Regulations 2000
- Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) 2002
- Housing Act 2004
- Building Regulations 2010 (England and Wales)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Social Housing (Regulation) Act 2023
- Building Safety Act 2022

Appendix 2 Electrical Component Testing Cycles

Component	Maximum Period Between Test	Responsible Person	Cycle Ref
CCTV	12 months	Facilities Manager	In House scheduling
Door Entry	12 months	Facilities Manager	In House scheduling
Warden Call	12 months	Facilities Manager	In House scheduling
Automatic Shower Waste Pump	12 months	Facilities Manager	In House scheduling
Lightning Protection systems	12 months	Facilities Manager	BSEN 62305 and Electricity at Work Regulations
Domestic Stair Lifts	12 months	Facilities Manager	The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
Hoists	6 months	Facilities Manager	The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
Through Floor Lift	6 months	Facilities Manager	The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
Hydraulic Lifts	Quarterly	Facilities Manager	The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

Passenger Traction Lifts	Quarterly	Facilities Manager	The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
Elec Ventilation systems	12 months	Facilities Manager	Air Conditioning – EU F-gas Regulation No. 842/2006
Booster Pumps	12 months	Facilities Manager	In House scheduling
Air Conditioning	6 months	Facilities Manager	Air Conditioning – EU F-gas Regulation No. 842/2006
Fire Alarms	3 months	Facilities Manager	Fire Systems – The Regulatory Reform (Fire Safety) Order 2005
Emergency Lighting	12 months	Facilities Manager	Emergency Lights – The Regulatory Reform (Fire Safety) Order 2005
Electronic Gates	6 months	Facilities Manager	In House scheduling
Automatic Doors	6 months	Facilities Manager	In House scheduling
Intruder Alarm GWR	12 months	Facilities Manager	In House scheduling
Laundry Equipment	12 months	Facilities Manager	Table 3.2 IET Guidance Notes 3
Domestic Fixed installation	5 Years/Change of Tenant	M & E Manager	Table 3.2 IET Guidance Notes 3
Portable Appliances	12 months	Facilities Manager	Table 3.2 IET Guidance Notes 3

Fixed Wiring Communal Area	5 years	Facilities Manager	Table 3.2 IET Guidance Notes 3
Communal Aerial Systems	12 months	Facilities Manager	Table 3.2 IET Guidance Notes 3
Fixed Wiring Commercial Assets	5 Years	Facilities Manager	Table 3.2 IET Guidance Notes 3
Sheltered/Supported/Extra care Schemes	5 Years/Change of Tenant	Facilities Manager	Table 3.2 IET Guidance Notes 3
Domestic Photovoltaic (PV) Installations	3 Years	M & E Manager	In House scheduling
Houses of Multiple Occupation (HMO's)	5 Years/Change of Tenant	M & E Manager	Table 3.2 IET Guidance Notes 3 See Note Below

Note The Management of Houses in Multiple Occupation (England) Regulations and the Management of Houses in Multiple Occupation (Wales) Regulations