

Electrical Compliance Policy



Directorate: Property Services

Issue Date: June 2023

Revision Date: June 2026

Version: 3

Document Information

Scope:

The aim of this policy is to ensure that Salix Homes complies with the current legislation and best practices in relation to the standard for electrical installation and the safety of electrical wiring in domestic, commercial, industrial, and other buildings. British Standard BS 7671 - Requirements for Electrical Installations. IET Wiring Regulations and Electricity at Work Regulations 1989. Additionally, in compliance with HSE guidance documents (ref section 8. Related Documentation).

Service Standards / Performance Measures / Corporate Strategy:

Electrical Installation Condition Reports (EICR)

- Salix Homes will ensure all electrical wiring installations are to hold a satisfactory EICR not more than 5 years (industry best practice)
- Where 5 years is not achievable Salix Homes will ensure no individual EICR is not more than 10 years (British Standard best practice)
- Where neither are achievable Salix Homes will enforce access to complete the EICR either by Court Process or Tenancy Agreement Breach
- A programme of rolling EICR's will be undertaken by the incumbent electrical contractor;
- Works to the electrical wiring undertaken as part of a wider investment led scheme will issue a new EICR regardless of age of current certificate;
- All properties that become void will default to having a new EICR regardless of age of current certificate;
- No repair works shall be completed to a property where an EICR is over 5 years old until a satisfactory EICR is issued;
- All EICR's will be completed digitally and stored in the R: Drive and EICR Database for audit purposes.

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) over 12 months old to have a PAT test conducted by a competent person. This does not apply to customers own portable equipment including any items gifted by Salix Homes to customers at the start or during their tenancy for which Salix are not liable.

Risks:

The following strategic risk is linked to this policy and shows the relevant mitigating controls:

Document Information

SR36 – Failure to manage assets to comply with agreed standard and produce the planned financial and social returns

Salix Homes acknowledges and accepts its responsibilities under BS 7671 (18 edition, amendment 2; 2022) to identify properties (communal, domestic or otherwise) to hold a current EICR. Approved guidance information by the Health and Safety Executive shall be taken as the adopted standard. Failure to adequately manage the risk can lead to:

- Enforcement action by enforcing authorities;
- Costs of civil action by persons or companies for loss / damage;
- Cessation of electric or closure of property as a result of prohibition notices and costs of remedial actions and investigations;
- Compensation for persons where civil action is taken, and liability is proven;
- Increase in insurance premiums due to claims;
- Costs of legal representation in event of criminal and / or civil action; and
- Loss of goodwill or poor corporate image.

The main risk factors associated with the successful delivery of this procedure are:

- Failure of Salix Homes EICR database to provide up to date relevant information regarding current EICR's.
- Failure of employees and contractors to follow British Standard guidance for completing EICR checks.
- Failure to respond to identified unsafe conditions leaving a wiring installation in a potentially dangerous condition raising the potential for harm to persons who may use the installation
- Failure to undertake ongoing electrical management and upgrades as investment, legislation or guidance requires.

Salix Homes acknowledges and accepts its responsibilities under the Electricity at Work Regulations 1989 to identify portable equipment i.e. electrical equipment with a plug, to hold a current PAT test where said equipment is over 12 months old (excluding customers own portable equipment including any items gifted by Salix Homes to customers at the start or during their tenancy for which Salix are not liable). Approved guidance information by the Health and Safety Executive shall be taken as the adopted standard. Failure to adequately manage the risk can lead to:

- Failure of Salix Homes Accuserve compliance database to provide up to date relevant information regarding current PAT certificates.
- Failure to respond to identified unsafe conditions leaving a electrical portable appliance in a potentially dangerous condition raising the potential for harm to persons who may use the installation

Measures for Managing the Risk

Effective management of the EICR and PAT cyclical programme is undertaken by the Electrical Compliance Manager and Compliance Admin Team informing of all satisfactory EICR's and PAT certificates and their expiry dates where properties with the oldest EICR will be the priorities for the organisation.

Document Information

A component of the management of EICR's is the application of the Electrical Procedure, implementing a rolling programme of EICR's, investment led works to properties, new development schemes, void properties and day to day electrical works to properties.

Salix Homes will undertake necessary works as deemed by the EICR (C1 and C2 faults and FI (further investigation)). Improvement recommendations (C3) and recommended to client (R) will be assessed by the Responsible Person Deputy and actioned where required.

The above are however standard recommendations and as such an individual Responsible Person may observe or amended the recommendations, as deemed appropriate. Any amendments to recommendations will be based upon the Responsible Person's own intimate knowledge of such criteria as:

- the remaining operational lifetime of the building
- predicted future occupation levels for the building
- future refurbishment projects etc

These will be assessed by Salix Homes who will identify the most appropriate and applicable management strategy for each of the property.

Related Policy/Procedure & Documents:

Electrical Compliance Procedure
Health and Safety Policy and Procedures
GM16 – Electrical Safety Guidance

Legislation

- The Health and Safety at Work Act 1974
- Electricity at Work Regulations (1989)
- The Defective Premises Act 1974
- The Management of Health & Safety at Work Regulations 1999
- Workplace (Health, Safety and Welfare) Regulations 1992
- Construction (Design and Management) Regulations 2015
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

Approved Codes of Practice (ACoP) (Health & Safety Executive)

- BS 7671:2018 (2022) Requirements for electrical installations British Standards Institution (Also known as IET Wiring Regulations 18th edition, amendment 2)

Guidance Documents (Health & Safety Executive)

- Reference the website for individual documents linked to electrical safety:
<http://www.hse.gov.uk/electricity/standards.htm>

Retention & Legal Basis for Storage:

EICRs. New regulations came into force on 1 June 2020 require landlords to have the electrical installations in their properties inspected and tested by a person who is qualified and competent, at an interval of at least every 5 years

EICRs are stored for six years in line with the Salix Homes Data Retention Schedule on the R:Drive and EICR Database.

Document Information

PAT testing is conducted annually prior to the expiry of the previous test.

Stakeholders:

Stakeholder consultation did not take place during the drafting of this policy due to the completion of EICRs & PAT being a regulatory requirement.

Equality, Diversity and Inclusion:

Salix Homes is committed to promoting and embedding a culture of equality, diversity and inclusion (EDI) within our workplaces and the communities we serve.

- Equality is about ensuring that every individual has an opportunity to make the most of their lives and talents;
- Diversity is recognising difference and responding positively to those differences;
- Inclusion is about creating an environment where our services and employment opportunities are accessible to all.

We are committed to meeting our obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. We will consider all the protected characteristics of the Act which are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Race
- Religion or belief
- Sex
- Sexual orientation
- Pregnancy and maternity

We also recognise that Socioeconomic background is an area where inequalities exist and commit to addressing this disadvantage and inequality in our communities where able to do so.

We are also mindful of our duties under the Public Sector Equality Duty, which is to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Where reasonable to do so, Salix Homes will make any reasonable adjustment to ensure compliance with the Act.

Data Protection Impact Assessment (DPIA)

Document Information

A DPIA was completed by Stewart Kerr, Building Safety Manger, which found there to be no data protection implications as only property information is collated.

Equality Impact Assessment (EIA)

An EIA was completed by Stewart Kerr, Building Safety Manger, which found there to be no equality implications as only property information is collated.

Introduction

1. Salix Homes acknowledges the risks associated with electrical wiring and electrical portable equipment. This policy recognises the requirements set out in BS 7671 to periodically check a property's wiring installation and Electricity at Work Regulations 1989 to ensure wiring and equipment it is fit for purpose and not liable to fail leading to loss of power to ultimately the potential for a fire.

Electrical Installation Condition Reports

2. The British Standard recommends all fixed wiring is tested within 10 years of the previous certificate and the social housing industry recommends this to be 5 years. Salix Homes will aim to ensure all properties are tested within 5 years and no properties will exceed 10 years of their previous test at which point the tenancy will be subject to enforced access.
 - Salix Homes is committed to adhering to the Health and Safety at Work Act 1974, Electricity at Work Regulations (1989), The Management of Health and Safety at Work Regulations 1999 and, more specifically to this policy, BS7671. These regulations place a number of duties on an employer to safeguard the health and safety of their employees and others.
 - as part of the requirements to ensure all electrical wiring installations are of a standard that where any electrical works deemed required are carried out to ensure a **satisfactory EICR** report.
 - Salix Homes will instruct 3rd parties or carry out EICR (Electrical Installation Condition Report) by those persons competent (carry satisfactory qualifications with suitable levels of experience) to do so.
 - will not leave an installation (part or whole) in an unsatisfactory condition that could pose risk to the resident, Salix Homes employees or others.
 - will prioritise where deemed suitable other recommendations as an improvement to a satisfactory installation as detailed on the EICR.
 - Salix Homes will progressively upgrade electrical installations in the course of its cyclical maintenance programme, refurbishment works, or at other appropriate times.

Portable Appliance Testing

3. The regulations recommend all electric portable equipment is has a PAT annually except for any equipment less than 12 months old (excluding customers own portable equipment including any items gifted by Salix Homes to customers at the start or during their tenancy for which Salix are not liable).
 - Salix Homes is committed to adhering to the Health and Safety at Work Act 1974, Electricity at Work Regulations (1989), The Management of Health and Safety at Work Regulations 1999. These regulations place a number of duties on an employer to safeguard the health and safety of their employees and

others

- Portable electrical equipment will be selected after carefully considering the intended use and the conditions under which it will be used. Equipment must be suitable for the purpose and carry a CE (or equivalent standard) mark
- Portable appliance testing (PAT) of all applicable equipment will be undertaken on an annual basis and visually inspected before each use. Any items not captured at this time are to be tested once reported and added into the asset list for the annual testing programme.
- Equipment deemed unsafe will be removed from use immediately either through the visual inspection or PAT so it does not pose risk to Salix Homes employees or others.

Responsibilities

4. **Management and Hierarchy of Control** To ensure that the Electrical and Electrical Procedure are adhered to, suitably experienced and senior employees within Salix Homes will be nominated to act as a 'Responsible Person' to oversee their effective implementation and review on behalf of the individual Primary Duty Holder.
5. **Management Responsibilities** The duties as set out in BS 7671 will rest with the person in control of the premises of properties providing rented or leased accommodation.
6. In terms of the individual Primary Duty Holders and their property portfolio, the responsibility for the implementation of this Policy and the associated Electrical (EICR – Electrical Installation Condition Report) Procedure will rest with selected members of the senior management team to act as appointed 'Responsible Persons' in the management of EICR's.
7. Those personnel within the Salix Homes senior management structure and their associated responsibilities in managing EICRs are given below:
8. **The Duty holder: The Chief Executive Officer**
The Salix Homes Chief Executive shall be ultimately responsible for ensuring compliance with current guidance document and to ensure that Salix Homes fulfils its duties and responsibilities as laid out in this document (and the Electrical Compliance Policy). With the assistance of the Executive Director of Assets, Growth & Sustainability, the CEO is responsible for;
 - Reviewing and endorsing the Policies, Procedures and Guidance document produced for Salix Homes;
 - Ensure that the duty holder understands and has the necessary training and resources to fulfil their duties in this role;
 - At reasonable intervals, review with the individual duty holders and the appointed Responsible Persons, the implementation, observance and performance of this document and of the Salix Homes Electrical Compliance Policy.

9. The Responsible Person: Building Safety Manager

The named manager, acting as the Appointed Responsible Person, shall hold responsibility for the implementation of this Procedure for Salix Homes. In addition, they shall ensure suitable resources and arrangements are in place for:

- Setting and endorsing the policy for EICR and PAT management, developing procedures for effective implementation.
- Ensuring that EICR's are undertaken for all identified properties, the common areas to properties providing rented or leased accommodation and other buildings in which Salix Homes employees work. This information must be accessible to the relevant persons, i.e. senior managers and employees of Salix Homes.
- Ensuring that EICR's are undertaken for properties on a priority basis e.g. based on the expiry date of the last EICR (oldest to newest). That EICR's are stored in the appropriate location and accessible for audit and information purpose.
- Ensuring the maintenance of the Salix Homes EICR database.
- Ensuring that appropriate employees are available, and have been suitably trained, to provide advice and information on EICRs to persons who have an appropriate interest or connection. This shall also include ensuring that suitably trained employees are available to conduct specific inspections on site, whether these employed directly by Salix Homes or from the appointed 3rd party subcontractor.
- Providing sufficient resources for employees in order for them to execute their duties and responsibilities in accordance with the BS 7671.
- Ensuring all PAT's are undertaken for equipment identified in offices, common areas of properties providing rented or leased accommodation and other buildings in which Salix Homes employees work. This information must be accessible to the relevant persons, i.e. senior managers and employees of Salix Homes.
- Appointing a Responsible Person(s) to undertake the management of the EICR & PAT programme, if this duty is not to be personally undertaken.
- Ensuring that the Responsible Person(s) understand and have the necessary training and resources to fulfil their duties in this role;
- At reasonable intervals, review the implementation of the both this document and of the corporate Electrical Compliance Policy (minimum 24 months) document.

10. Responsible Person Deputy: Electrical Compliance Manager

Responsible for the day to day controlling of the associated procedure to this policy in the event the responsible person is unavailable.

These persons will be suitably trained and aware of their duties under current

guidance and this policy document.

The Salix Homes employees identified as Responsible Person(s) shall ensure suitable arrangements are in place for implementing the procedures contained within this document and the Electrical Compliance Policy. In particular this shall include:

- Acting as a 'Responsible Person' to undertake management of the EICR and PAT programme on behalf of the Appointed Responsible Person as required.
- Ensuring any person undertaking works to the electrical installation of a property complete a new EICR as and where deemed necessary.
- Informing and/or seeking advice from electrical consultants regarding any amendments considered necessary to the Salix Homes.
- Seeking advice from electrical consultants in situations where the EICR information is not sufficiently detailed or further advice/reassurance is required.
- Ensuring information received from internal operatives and external consultants is received in a timely manner to update the EICR database.
- To directly oversee or appoint a competent body to audit follow on works for the purpose of a satisfactory EICR to ensure that they are completed to a satisfactory standard.
- To ensure that all relevant parties are informed as to the current status of an ECR for a property where it is over the industry best practice of 5 years.
- To act as contact in the case of any emergency in relation to electrical compliance for the property for which they are responsible.
- To check all persons working for, or on behalf of Salix Homes have relevant industry recognised qualifications to allow them to safely carry out their work to the best of their skill and ability.
- Alongside the Repairs & Maintenance Manager to check the calibration of all test instruments used to carry out EICR's on Salix Homes properties.
- Alongside the Repairs & Maintenance Manager to host annual assessment visits from the governing authority, with all authorised persons in attendance, providing at least 2 properties to be available for demonstration of the skills needed to act as Qualified Supervisor (Electrical)
- To ensure that electrical safety is upkept in periods of sickness or leave entitlement
- Alongside the Repairs & Maintenance Manager to annually assess the knowledge and skills of electrical operatives within Salix Homes to current standards
- Alongside the Repairs & Maintenance Manager to hold monthly CPD toolbox talks to all members of the electrical team to enable them to attain the

necessary points to merit continuation within the specific governing body scheme (Domestic Installer or Approved Contractor)

- Ensuring PAT testing of operative equipment is completed annually following the equipment's first 12 months of service
- Ensuring PAT testing of home/hybrid workers equipment not conducted as part of the Responsible Persons PAT Programme of offices etc is completed annually following the equipment's first 12 months of service