

OPS013 - Electrical Safety Policy

MONITORING FORM	
Department	Operations
Department Director	Diana MacLean
This policy is applicable to	Electrical Safety
Author	
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Internal /external consultees (if required).	<u>Internal</u> Landlord Compliance Working Group Transformation Plan Strategy Group <u>External</u> Tenant Representative

1. INTRODUCTION

Electrical installations and equipment within housing stock and communal areas managed by Weslo Housing Management (WHM) need to be kept safe and regularly maintained.

This policy explains how WHM's commitment to electrical safety will be met.

The policy will be supported by an Electrical Safety Management Plan providing more detailed guidance, procedures and process maps.

2. TENANT CONSULTATION

This policy is based on legislative and regulatory requirements. There has been consultation with internal teams within WHM and tenant representatives.

3. SCOPE

For the purposes of this policy it is deemed to include WHM housing stock, all employees (permanent, temporary or contracted) and any other stakeholder if relevant to the Policy.

4. OBJECTIVES

The key objective of this policy is to describe how WHM will meet the statutory, contractual and regulatory requirements in relation to electrical safety. It will also cover how the WHM Board of Directors, as Duty Holder, will receive assurance of landlord compliance in relation to :-

- fixed wire testing
- portable appliance testing
- automated doors, gates and barriers
- lightning protection systems.

WHM will comply with all current and relevant legislation; specifically as detailed in the following;

a) Testing of Fixed Wiring Systems

- 18th Edition of the IET Wiring Regulations (BS 7671:2018)
- The Electricity at Work Regulations 1989 (EAWR)
- Scottish Building Regulations.

b) Portable Appliance Testing

- 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."**

c) Powered Doors, Gates and Barriers

- The Health and Safety at Work Act (1974) sections 3 and 4 place a duty to ensure the health and safety of users, so far as is reasonably practicable;
- BS EN 12453:2017 Industrial, commercial and garage doors and gates. Safety in use of power operated doors. Requirements and test methods
- BS EN 120604:2017 Industrial, commercial and garage doors and gates. Mechanical aspects. Requirements and test methods

d) Lightning Protection Systems

- Detailed in BS EN 62305:3:2011: 'Protection against Lightning – Physical damage to structures and life hazard' and its subsequent amendments. Section 7 and E7 of the British Standard (BS EN 62305:3:2011) sets out the requirements for maintenance and inspections of lightning protection systems.

As a Registered Social Landlord (RSL) WHM must meet the requirements of the Scottish Housing Regulator's Scottish Social Housing Charter and the Scottish Housing Quality Standard (SHQS).

Failure to properly discharge WHM's legal responsibilities may result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
- Prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007
- SHR's serious detriment judgement
- Reputational damage
- Loss of confidence by stakeholders in the organisation

In order to comply with regulatory standards and legal obligations, and to ensure the safety of its customers, staff, contractors and other visitors to its properties, WHM will:

4.1 Process

- a) Provide clear lines of responsibility for the management of fixed wiring systems; portable appliance testing; powered doors, gates and barriers; lightning protection systems; and photovoltaic systems supported by written guidance in the Electrical Safety Management Plan.
- b) Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake electrical safety checks, which shall include legal action when required.
- c) Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability local connections etc.)
- d) Maintain a process for dealing with unsafe situations in accordance with the regulations.

4.2 Delivery

4.2.1 Fixed Wire Testing

- a) Ensure all commercial and communal areas hold a valid Electrical Installation Condition Report (EICR) within the cycle specified by the competent person undertaking the test but, in any event, at intervals not exceeding 5 years.
- b) Work towards a programme that ensures inspections and testing of fixed wiring systems within domestic properties takes place on a 5 year cycle (or sooner if recommended by the competent person undertaking the test).
- c) Ensure all electrical installations in a domestic tenanted property are inspected and tested resulting in the creation of an Electrical Installation Condition Report (EICR) with all C1, C2 and FI observations resolved and documented prior to letting:
- d) If a property remains unoccupied for a period exceeding 6 months from its last test, a further EICR must be completed prior to occupation.
- e) In addition to checking all installations maintained by WHM, inspect any electrical work carried out by the tenant at the same time. Any works found to be unsafe, or not complying with BS 7671 will be disconnected and made safe appropriately at the time of inspection.
- f) Certain tenant-own works will be allowed to be left in situ, such as light fixings and switches which have been appropriately installed and deemed safe for continued use by the competent person completing the inspection. These will be recorded on any relevant paperwork and on the Master Database.
- g) Prioritise remedial works arising from fixed wire testing and apply a timescale for action, as detailed within the Electrical Safety Management Plan.
- h) All C1 (Danger Present, Risk of Injury) works will be resolved immediately.
- i) We will aim to complete all C2 works (potentially dangerous) at the time of the inspection and testing.
- j) A property will only be considered as satisfactory once documented evidence is provided that all C1, C2 and FI (Further Investigation) works are resolved. This evidence is then appended to the original EICR.

4.2.2 Portable Appliance Testing

- a) Risk assess all appliances provided by WHM which are used by employees, residents, customers, and visitors.
- b) Undertake Portable Appliance Testing (PAT) at a frequency arising from the risk assessed schedule as per the Code of Practice for In-service Inspection and Testing of Electrical Equipment.

- c) WHM will retain appropriate documentation.
- d) Establish a cycle of subsequent re-testing at the time of the first test.

4.2.3 Automated Doors, Gates and Barriers

- a) Detail the frequency of inspections and procedures within the Electrical Safety Management Plan, but as a minimum this will be on an annual basis.
- b) WHM will retain appropriate documentation.

4.2.4 Lightning Protection Systems

- a) Carry out inspection and testing on an 11-month rolling basis to ensure that inspection and testing under different climatic conditions.
- b) WHM will retain appropriate documentation.

4.2.5 Solar PV

- a) Check systems in accordance with the Electrical Safety Management Plan.
- b) WHM will retain appropriate documentation.

4.3 Additional Safety Measures

- a) Require that tenant installations should be subject to prior agreement before works are undertaken.
- b) Any unauthorised installations deemed to be unsafe will be disconnected and remedial works, where required, will be carried out at the tenant's own expense and by WHM's appointed contractor.

4.4 Contractors Competency

- a) Only engage with electrical contractors who are recognised by a Certification or Registration Body as technically competent to undertake design, construction, maintenance, verification and/or inspection and testing of electrical systems which meet the criteria of the Approved Certifier of Construction. Examples of these may include: NICEIC, SELECT, or NAPIT
- b) Expect that contractors shall demonstrate that all engineers engaged in work for WHM shall meet the required standard of training.
- c) Only engage with suitably qualified and competent lightning protection systems specialist contractors to undertake work on lightning protection systems and shall be a member of ATLAS (The Association of Technical Lightning & Access Specialists).

- d) Require a Micro generation Certification Scheme (MCS) accreditation for those engaged with installing micro generation systems e.g. Solar PV
- e) Carry out an assessment of all contractor competencies periodically or at change of contract /contractor, as detailed within the Electrical Safety Management Plan.

4.5 Internal Competency

- a) Maintain a skills/training matrix to ensure that all staff undertaking key roles within the scope of this policy have appropriate training.
- b) Will operate a detailed competence framework including regular appraisals as part of the Electrical Safety Management Plan.

4.6 Data

- a) Maintain an up to date Master Database of all properties where they have a responsibility to provide electrical safety checks and maintenance, including testing of fixed wiring systems, portable appliances, powered doors, gates and barriers, lightning protection systems and micro generation systems.
- b) For each relevant property record and maintain up to date data confirming which systems and appliances within the scope of this policy exist and the organisation's associated responsibility
- c) Where a requirement exists hold data and certification relating to the last two safety checks and record the next due date
- d) Where a requirement does not exist hold appropriate evidence
- e) Maintain current and up to date records of remedial works for all properties which will detail all recommendations from the fixed wire testing.
- f) The records will include; address and risk profile of the property, detail of the work item required, priority and target completion, person responsible, when the work was completed, who it was signed off by and evidence of completion

4.7 Assurance

- a) Ensure that all persons involved with the design, construction, maintenance, verification and/or inspection and testing of electrical systems and appliances are properly trained and accredited.
- b) Carry out works-based assurance activities including checks on certification and post-inspection of onsite works to the level stated within the Electrical Safety Management Plan. A proportion of such checks will be carried out by an independent party.
- c) Set a timetable for the review of the Electrical Safety Policy and the associated Electrical Safety Management Plan.

4.8 Communication

- a) Encourage customers, through the provision of publicity information, to allow access to carry out EICRs, other safety checks and inspections and remedial works.

4.9 Monitoring Performance

- a) The following Key Performance Indicators (KPIs) will be reported:
 - % of Communal / Commercial Properties having a valid Electrical Installation Condition Report (EICR) within the cycle
 - % of Domestic Properties having a valid Electrical Installation Condition Report (EICR) within the cycle
 - No of properties with outstanding C1 or C2 works
 - % of Portable Appliance Testing (PAT) completed
 - % of automated doors risk assessed /serviced
 - % of automated gates and barriers risk assessed /serviced
 - % of Lightning Conductors inspected and tested

Valid certification shall mean that all immediately and/or potentially dangerous faults have been resolved.

- a) Commentary will be provided for any properties out of date to include the date they became overdue, days overdue, and their position within the access legal process to bring them back into a compliant position.
- b) Commentary will also be provided if any properties have outstanding overdue actions.
- c) Additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.
- d) A detailed Performance Indicator (PI) suite will be defined within the Management Plan.
- e) The following assurance activity will be undertaken and reported in line with the Management Plan:
 - Internal audit
 - Strategic review
 - 3rd Party Assurance

4.10 Scheme of Delegation

- a) **The Duty Holder** and the responsible authority for approving this policy is the **WHM Board of Directors**.
- b) **The Operations Director** is responsible for ensuring the effective implementation of this policy.
- c) **The Responsible Person** for formulating this policy, reviewing and monitoring its implementation and managing performance against this policy is the **Technical Manager**

5. EQUALITY & DIVERSITY

This Policy will always be carried out in accordance with Weslo's Policy of Equality & Diversity which aims to promote diversity, fairness, social justice and equality of opportunity by adopting and promoting fair policies and procedures.

An Equality Impact Assessment has been carried out and actions identified are incorporated into the Electrical Safety Management Plan.

6. PUBLICISING AND AVAILABILITY

This policy is available on the WHM website, to the Board of Directors and staff members and any other key stakeholders. Copies are available free of charge. A summary of this policy can be made available in other formats and languages.

7. MONITORING & REPORTING

This policy will be reviewed regularly to ensure compliance with applicable legislative changes, changes within the organisation and best practice

8. COMPLAINTS

Anyone wishing to make a **formal** complaint about the services provided by the organisation should do so as per our complaints procedure.

9. OTHER RELEVANT POLICIES AND PROCEDURES

This Policy relates to:

- a) Landlord Compliance Strategy
- b) Electrical Safety Management Plan

And these must be read in conjunction with this Policy.