

Electrical Safety Policy

Scope of Policy

This policy details how Platform Housing Group (the Group) meets all legal and regulatory requirements. In addition to this, the policy aims to provide assurance that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with electrical installations and electrical portable appliances.

Applicability

The policy applies to all members of the Group.

1. Policy Statement

1.1 The Group acknowledges and accepts its responsibilities regarding electrical safety under the:

- Landlord and Tenant Act 1985
- Housing Act 2004
- Electricity at Work Regulations 1989
- The Electrical Equipment (Safety) Regulations 2016

1.2 The Landlord and Tenant Act 1985 places duties on landlords to ensure that electrical installations in rented properties are:

- Safe when a tenancy begins
- Maintained in a safe condition throughout the tenancy

1.3 To be compliant under these duties, electrical installations are required to be kept in a good state or repair and free from any 'Category 1' electrical hazards.

2. Context

2.1 This policy is set within the context of relevant legislation and guidance:

- Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999 (as amended)
- The Electricity at Work Regulations 1989
- BS 7671 Requirements for Electrical Installations - IET Wiring Regulations
- SI 2002 No. 2665 – The Electricity Safety, Quality and Continuity Regulations 2002 (as amended)
- BS 5266-1:2016 Emergency Lighting – Code of Practice for the Emergency Lighting of Premises

- BS 5839-8:2013 Fire Detection and Fire Alarm Systems for Buildings – Code of Practice for the Design, Installation, Commissioning and Maintenance of Voice Alarm Systems

2.2 It also takes account of the regulatory expectations as outlined within the Regulatory Framework for Social Housing in England (March 2015) and Regulator of Social Housing: Consumer Standards - Safety and Quality Standard.

3. Aims and Objectives

3.1 The aim of this policy is to ensure that the Group complies with all legal requirements in respect of electrical safety. To achieve this, the Group shall ensure that all required properties hold an Electrical Installation Condition Report (EICR) or an Electrical Installation Certificate (EIC) that confirms the installation has been inspected.

3.2 The key objectives of the policy are to outline the principles that apply to:

- Electrical safety management
- Approach to prioritising remedial work
- Record keeping
- Competent persons
- Training
- Audit procedure

4. Policy Outline

4.1 Detailed below are the key policy principles the Group applies to electrical safety.

4.2 In executing this policy, the Group will:

- Hold accurate records within the core asset management data system against each property it owns or manages identifying when the electrical installation was last inspected and tested.
- Ensure all domestic properties owned or managed have an EICR or EIC that had been completed within 10 years of the previous test date. It is the Group's aspiration to move towards a 5-year cycle and acknowledges that changes to legislation are currently being reviewed by Government.
- Ensure all non-domestic (communal) properties owned or managed have an EICR or EIC that had been completed within 5 years of the previous test date.
- Ensure all electrical installations shall be in a safe condition following completion of an electrical installation inspection and test. A safe condition shall be defined as one that is free from any 'Category 1' hazards at the time of completion, with any remedial works or further investigations being undertaken as required.

- Ensure electrical installation inspection and tests are carried out prior to the commencement of any change of tenancy and that a satisfactory EICR is issued to the customer prior to occupation.
- Ensure that only suitably competent NICEIC (or equivalently accredited) electrical contractors and engineers undertake electrical inspection, testing, installation and remedial works.
- Ensure all known electrical portable appliances, for which the Group has a responsibility, are tested periodically and repaired or replaced as per the outcome of the test.
- Ensure that when completing planned component replacement works, that include alterations to the electrical installation, an EICR or EIC is issued upon completion, both of which shall be recorded to update the next periodic inspection test date.
- During a periodic inspection, test and replace defective or expired smoke detectors, heat detectors and carbon monoxide detectors.
- Ensure robust processes and controls are in place to prioritise and manage the completion of remedial works identified during inspection and testing of electrical installations and electrical portable appliances for which the Group is responsible.
- Ensure robust processes and controls are in place to ensure that all electrical works are properly notified and approved under Part P of the Building Regulations for England and Wales where this is required.
- Ensure robust processes and controls are in place to manage works to void and occupied properties that may affect existing electrical installations.
- Have a robust process in place to gain access to properties where customer vulnerability issues are known or identified whilst ensuring timely access to any property to be compliant with this policy and safeguard the wellbeing of the customer.
- Ensure that all submitted EICRs are reviewed to confirm that they have been completed correctly and any recommended remedial works are issued as required. It is accepted that, in some instances, C3 recommendations shall be implemented at the next point of major works on the installation.
- Undertake third party auditing on periodic testing activities to provide additional assurance around the works being completed.
- Regularly review the job profiles, skills, knowledge and experience of those persons involved in the delivery of this policy and, where necessary, provide training so that they can deliver this policy.
- Any incident that occurs regarding Electrical Safety shall be reported within the SHE Assure system, which is managed by the Group's Health, Safety & Environmental Team, which shall assess and take further action where required. In some instances, events may be reportable to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

5. Prioritisation of Remedial Work

- 5.1 The Group will ensure there is a robust process in place for the prioritisation and management of any remedial works required following the completion of a periodic inspection and test of an electrical installation or electrical portable appliance.
- 5.2 Remedial work will be recorded on the EICR and prioritised as follows:
- **C1 (Danger Present)**, meaning the safety of those using the installation is at risk and immediate remedial action is required.
 - **C2 (Potentially Dangerous)**, meaning those using the installation may not be at immediate risk, urgent remedial action is required to remove potential danger.
 - **C3 (Improvement Recommended)**, meaning the inspection has revealed a non-compliance with the current safety standard, whilst not presenting immediate or potential danger.
 - **FI (Further Investigation)**, meaning that further investigation on the installation is required. Usually, it should be possible to attribute a Classification Code to each observation without the need for further investigation. However, when FI is used, the item must be thoroughly investigated as soon as possible to either remove the query or have the correct Classification Code assigned to the defect.
- 5.3 The Group shall, as a minimum, make safe and/or, where possible, endeavour to repair all C1 and C2 defects identified by a periodic electrical installation inspection and test before leaving site after completing the inspection and testing works. Where it is not possible to rectify C1 defects then the system shall be isolated prior to leaving. Where it is not possible to rectify all C2 defects prior to leaving site, a return visit to the property shall be scheduled in for these works to be completed.
- 5.4 The Group will establish and implement programmes of electrical installation upgrading works to improve electrical installations that have been identified as in need of significant remedial works as part of the periodic testing programme.

6. Record Keeping

- 6.1 The Group will maintain a core asset register of all properties that have an active electrical supply and electrical installation. This register identifies electrical installations within all domestic properties and electrical installations within non-domestic (communal) properties and offices.

7. Group Responsibilities and Monitoring

- 7.1 The Group manages over 50,000 homes from the Derbyshire Dales in the north, to the Cotswolds in the south and from Herefordshire in the west to Lincolnshire in the east.

Within this stock, there are also non-domestic locations including communal areas, offices, shops and garages. To ensure the management of electrical installations and general electrical safety is maintained across the portfolio, in addition to this policy, the Group has developed comprehensive procedures and systems in relation to Electrical Safety.

The Group's approach for gaining assurance of electrical safety for properties managed by a third party is defined in 'The Management Plan for Commercial and Business Leased Properties' and '3rd Party Managed Properties – Ensuring compliance for key areas of building safety' process map.

- 7.2 The Group is the "Responsible Person" under Health and Safety at Work etc. Act 1974. The Group Chief Executive emphasises the responsibility is acknowledged and lies at the top of the organisation and is cascaded down through the organisation.
- 7.3 The Executive Director of Property is appointed to establish and monitor the implementation of the Electrical Safety Policy within the Group.
- 7.4 To provide consistency towards the undertaking of Periodic Testing, a set of 'Agreed Limitations' are in place that defines the expectations and requirements when undertaking periodic testing.
- 7.5 Performance reporting for the management of electrical safety is provided to Board and the Asset Development Committee monthly. This reporting is provided by the Building Safety Team.

8. Information for Customers and Their Responsibilities

- 8.1 The Group shall provide general safety information for customers, where necessary, regarding electrical safety within their homes. This shall also include ensuring that customers are reminded that any electrical works completed as part of a customer alteration must only use qualified electricians and ensuring they provide the relevant Certification.
- 8.2 The Tenancy Agreement requires customers to allow the Group access to the property for the purposes of testing electrical installations.
- 8.3 The customer is responsible for immediately reporting any concerns with electrical systems and turning them off until they are checked/repared by a qualified electrician if requested to do so.

9. Equality and Diversity

- 9.1 We are committed to fairness and equality for all regardless of colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history, as referred to in our relevant Group policies. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.
- 9.2 Impact assessments, as to data protection and equality, have been undertaken in respect of this policy and which identified no negative impacts on any person/group with a protected characteristic.

10. Complaints

- 10.1 We aim to meet the needs of our customers by providing an excellent service. However, it is acknowledged that occasionally things go wrong and customers may wish to complain. Should the need arise to make a complaint, please refer to our Complaints, Comments and Compliments Policy.

11. Monitoring and Review

- 11.1 We will monitor the effectiveness of this policy, procedures and systems through relevant performance information which will be reported through the Group Board, Executive Team, Group Audit and Risk Committee, Senior Leadership Team and appropriate Customer Panels.
- 11.2 This policy will be reviewed every three years or on the introduction of new legislation or best practice guidelines, whichever is the sooner.
- 11.3 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until an updated version is available.

12. Associated Documents

- 12.1 List of documents - associated policies, procedures and publications:
- Group Health and Safety Policy
 - Group Denied Access Procedure
 - Complaints, Comments and Compliments Policy
 - Landlord and Tenant Act 1985
 - Housing Act 2004
 - The Electricity at Work Regulations 1989
 - The Electrical Equipment (Safety) Regulations 2016
 - Health and Safety at Work etc. Act 1974
 - The Management of Health and Safety at Work Regulations 1999 (as amended)

- The Electricity at Work Regulations 1989
- BS 7671 Requirements for Electrical Installations - IET Wiring Regulations
- SI 2002 No. 2665 – The Electricity Safety, Quality and Continuity Regulations 2002 (as amended)
- BS 5266-1:2016 Emergency Lighting – Code of Practice for the Emergency Lighting of Premises
- BS 5839-8:2013 Fire Detection and Fire Alarm Systems for Buildings – Code of Practice for the Design, Installation, Commissioning and Maintenance of Voice Alarm Systems
- Regulatory Framework for Social Housing in England (April 2015)
- Regulator of Social Housing: Consumer Standards - Safety and Quality Standard

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