

Electrical Safety Policy and Procedure

HS315 Health and Safety Policies

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1. Introduction
   1. MHA recognises the potential risks associated with the installation, maintenance, and use of electrical installations. This policy will ensure that MHA’s management arrangements in relation to electrical safety are established, maintained, and promoted to ensure continual improvement of MHA services by:
   * Having clear roles and responsibilities for the management of electrical safety
   * Ensuring impact and risk assessments assess and adequately control the risk associated with electrical installations.
   * Providing adequate resources to ensure effective management of electrical safety.
   * Monitoring compliance with the requirements of this policy.
2. Scope and Purpose
   1. This policy applies to all persons employed or contracted to undertake activities relating to electrical installations on all properties owned and managed by MHA with the exception of leasehold properties where the duty holder is the leaseholder. This includes all repairs, maintenance, planned and capital works activities.
   2. The purpose of this policy is to ensure a robust electrical management system is established to:
   * Manage the delivery of electrical condition reports, safety checks, repairs, maintenance, and new electrical installations.
   * Hold accurate and compliant electrical inspection records and maintenance records.
   * Ensure that MHA’s domestic and commercial properties have a satisfactory and compliant electrical installation condition report (EICR).
   * Ensure that any C1 defects found during the electrical condition report are where reasonably practicable, completed whilst the electrical engineer is at the property. C2 defects will be completed as soon as is reasonably practicable, with the exception of those requiring a full or partial electrical rewire or those reported to the electrical network provider which will be prioritised based on risk exposure.
   * Ensure that there are robust processes in place to make sure that any additional or follow on works are carried out.
3. Definitions

| Term | Definition |
| --- | --- |
| **Commercial Installations** | * Commercial electrical installation refers to the process of installing and maintaining electrical systems and equipment in commercial buildings such as offices, retail, hospitals, schools, distribution centres, public buildings, banks, hotels, and other non-residential buildings. |
| **C1 Defects** | * Is an observation code which means there is a danger present with a risk of injury and Immediate remedial action required. |
| **C2 Defects** | * Is an observation code which is not as severe as a C1 but is still a potentially dangerous defect. They may not pose an immediate threat but are likely to become a danger in the future. A C2 is described as 'Potentially dangerous - urgent remedial action required.' |
| **Domestic Installations** | * An installation in a private dwelling which is not used in any hotel or boarding house or for the purpose of carrying out any business, trade, profession, or service. |
| **Electrical Installation Certificate** | * Electrical Installation Certificate is a record required when a new circuit is added to an existing installation, or replacement of distribution board, or full or partial installation rewire |
| **Electrical Installation Condition Report (EICR)** | * Electrical Installation Condition Report is a comprehensive document listing all the test results, readings and checks carried out during the testing of the electrical installation. |
| **Fixed Electrical Installations** | * The fixed electrical installation is the assembly of associated electrical equipment supplied from a common point of origin to fulfil a specific purpose and having certain co-ordinated characteristics. |
| **Immediate Re-Let** | * Is where a tenancy ends on the Sunday and a new tenant moves in on the Monday. Practically the outgoing tenant has until 12 noon on the Monday to vacate the property. |
| **Minor Electrical Installation Works Certificate (MEIWC)** | * Minor Electrical Works Installation Certificate is a record required for certain types of electrical work i.e. alteration to an existing circuit. |
| **Mutual Exchange** | * Is where two tenants swap each other’s property and tenancy. The tenancy does not legally end. Practically it means both tenants must move out of their property and into the new one on the same day. |
| **Portable Appliance Testing (PAT)** | * Portable appliance testing (PAT) is the term used to describe the examination of electrical appliances and equipment to ensure they are safe to use. Most electrical safety defects can be found by visual examination, but some types of defect can only be found by testing. However, it is essential to understand that visual examination is an essential part of the process because some types of electrical safety defect can't be detected by testing alone. |

* 1. This policy has been developed and is compliant with the Health and Safety at Work etc. Act 1974 and other relevant legislation and regulatory requirements including:
  + Electricity at Work Regulations 1989
  + Electrical Equipment (Safety) Regulations 2016
  + Landlord and Tenant Act 1985
  1. The Landlord and Tenant Act 1985 places duties on landlords to ensure that electrical installations in rented properties are:
  + Safe when a tenancy begins, Section 8 (1a)
  + Maintained in a safe condition throughout the tenancy, Section 11 (1b)
  1. As of 1st April 2021, private rental properties will have all domestic electrical installations tested at intervals of no longer than 5 years or sooner at each change of occupancy, all commercial installations must be tested at 5-year intervals. Both domestic and commercial electrical tests will be undertaken sooner if it is recommended by the competent person (BS7671:2018).

1. Electrical Safety Management Arrangements
   1. **Inspection Requirements**
      1. MHA will ensure that each property to which a duty applies has an EICR carried out within 5 years of the previous EICR for domestic and non-domestic properties.
      2. MHA will not accept unsatisfactory Electrical Installation Condition Reports (EICR) but insist where possible any faults with potentially dangerous C2 classifications, are done at the time the EICR is being carried out, and a satisfactory report issued.
      3. Where it is not possible to issue a satisfactory EICR due to the type of remedial work required i.e. full or partial electrical rewire, or the replacement of a distribution board, any C1 faults will be completed whilst the electrical engineer is at the property. C2 defects will be completed as soon as is reasonably practicable, with the exception of those requiring a full or partial electrical rewire or those reported to the electrical network provider which will be prioritised based on risk exposure.
      4. MHA will implement a robust process for cases where access is refused to carry out essential electrical safety work, and evidence collected to be able to demonstrate all reasonable steps have been taken.
      5. MHA will establish and maintain a plan of all continuous improvement activity undertaken with regards to electrical safety.
      6. MHA will ensure that there are robust processes in place to make sure that any additional or follow on works are completed.
      7. MHA will carry out an EICR upon commencement of any new tenancy, including void, mutual exchange or immediate re-let, managed or otherwise.
      8. MHA will carry out an EICR upon commencement of a new tenancy in a new build property when the tenancy commences more than 1 week following handover. A detailed visual inspection will be carried out and recorded on new build properties by a qualified electrician when the new tenancy commences within 1 week of handover from the builder.
      9. MHA will carry out the testing of smoke and CO alarms, which are interlinked and form part of the electrical system.
      10. MHA will ensure that a Minor Works Electrical Certificate is issued for applicable electrical work.
      11. MHA will install interlinked smoke alarms in all properties as part of the rewire programme, either wireless linked or hard wired.
      12. MHA will ensure that for non-domestic properties rented on leasehold basis i.e. retail shops, fast food catering establishments or other similar premises the leaseholder provides an electrical installation condition report within 5 years of the previous condition report.
      13. MHA will ensure that all other electrical installations and appliances such as electric heating, solar voltaic, un-interruptible power supplies are serviced and checked for safety in accordance with the manufacturer’s instructions.
   2. **Record Keeping**
      1. MHA will hold accurate records of maintenance and inspection of electrical systems including scheduled EICR inspection dates.
      2. MHA will retain electrical condition reports and maintenance documentation for the life of the electrical installation.

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| **Inspection Document** | **Retention Period** |
| **EICR** | 5 years |
| **PAT Testing** | 2 years  (Current certificate and the previous year’s certificate). |
| **Pull Cord Testing** | 2 years  (Current certificate and the previous year’s certificate). |

* 1. **Access**
     1. MHA will implement a robust process for cases where access is refused to carry out essential electrical safety work. This process will include the option to use legal methods to gain access.

1. Fixed Electrical Installations
   1. All new installations will be provided with an Electrical Installation Certificate complete with a Schedule of Inspections and Test Results.
   2. The frequency of periodic inspection and testing must be determined taking into account:
   * The type of installation
   * Its use and operation
   * The frequency and quality of maintenance
   * The external influences on which it is subjected.
   1. All buildings will be subject to a full Periodic Inspection and Test at the prescribed frequency.
   2. The frequency of testing should be increased if the history indicates signs of progressive deterioration.
   3. The provision of Marking and Labelling shall be provided in full accordance with BS 7671 2018 Requirements for Electrical Installations and Guidance Note 3 (Inspection and Testing) - including all current amendments.
   4. Records shall be provided in full accordance with BS 7671 2018 Requirements for Electrical Installations and Guidance Note 3 (Inspection and Testing) - including all amendments Additionally record drawings must be suitably provided / annotated to illustrate the electrical layout and circuit configuration of the installation following the completion of the Inspection and Testing regime and any necessary rectification works. Original Inspection certificates must be provided to MHA.
   5. Prior to starting any works activities appointed contractors must carry out a suitable and sufficient risk assessment for the work involved.
2. Portable Appliance Testing (PAT)
   1. PAT testing will be completed by an external organisation.
   2. Operational colleagues may use the visual inspection form in between official PAT tests to ensure that appliances are safe for use.
3. Roles and Responsibilities

| Role | Responsibilities |
| --- | --- |
| **All Colleagues** | * Ensure adherence to this policy is maintained and during the course of their work, actions and operating procedures set out in this policy are implemented, including the reporting of any incidents or near-misses related to electrical safety to line management immediately. * Any work completed must comply with the electrical safety management arrangements set out in section 5 and to BS7671 IET Wiring Regulations |
| **Home & Scheme Managers** | * Working with the Estates Team & Area Manager to establish a repair and renewals programme for interior, capital works. * Ensure adherence to this policy is maintained in their location. * Ensure copies of EICR are provided to tenants or displayed in a common area within 28 days of completion. * Ensure all mandatory requirements laid down by the regulator, Environmental Health Office and the Health and Safety at Work Act are complied with. * Ensure that effective contractor management is in place and relevant procedures are followed during the delivery of all programmes of work. * Enable access to the home / scheme for mandatory servicing, safety checks and inspections to be carried out. * Ensure that control measures or work instructions relating to managing risk are implemented and managed. * Escalate incidents or significant issues and report faults, hazards, unsafe practices, accidents, adverse incidents, dangerous occurrences, and near misses, whether injury is sustained or not to the Area Manager, Compliance Team, and Health and Safety Team, and on RADAR. |
| **Senior Operations Managers** | * In addition to the responsibilities of the Home & Scheme Managers, Area Managers must also ensure that Home and Scheme Managers are adhering to their responsibilities under this policy (as above). |
| **Property Surveyors** | * The management of asset management projects are maintained and repaired whilst ensuring compliance with regulatory requirements and policy. * Work to develop, implement, monitor, and keep up to date; processes to ensure the robust management and delivery of responsive repairs, void works, planned maintenance and improvement works. * Ensure that effective contractor management is in place and relevant procedures are followed during the delivery of all programmes of work. * Escalate incidents or significant issues and report faults, hazards, unsafe practices, accidents, adverse incidents, dangerous occurrences, and near misses, whether injury is sustained or not to the Head of Estates and Health and Safety, and Compliance Team. |
| **Support Services Team Manager** | * Leading the administration support team in the provision of repairs to premises including the development and analysis of operational performance data and provision of reports, whilst ensuring compliance with regulatory requirements and corporate policy. |
| **Estates Managers** | * In addition to the responsibilities of the Property Surveyors, the Capital Works Manager is also responsible for: * Leading the project management, contract administration and supervision of consultants and contractors employed to carry out capital works programmes, whilst ensuring compliance with regulatory requirements and policy. * Work with consultants in producing/approving specifications and designs to ensure that electrical safety installations are installed and checked for quality and compliance, in a manner that supports this policy. * Develop, implement, monitor, and keep up to date processes to ensure the robust management and delivery of responsive repair, planned maintenance and improvement works against statutory requirements, policy, and procedural arrangements. * To ensure that technical and quality inspections are undertaken as required and quality of work on site is effectively managed and controlled. * Ensure that effective contractor management is in place and relevant procedures are followed during the delivery of all programmes of work. * Escalate incidents or significant issues and report faults, hazards, unsafe practices, accidents, adverse incidents, dangerous occurrences, and near misses, whether injury is sustained or not to the Head of Estates and Health and Safety, and Compliance Team. |
| **Compliance Manager** | * Leading, directing, and managing the compliance function and support Head of Health and Safety, and Head of Estates. * Monitor and report statutory compliance. * Monitor estates compliance sector for emerging regulatory changes to make sure that MHA is prepared for future legislation and recommendations. * Lead on the management of a property risk management system and provide monthly progress reports to the head of estates and head of health and safety. * Ensure effective and up to date, processes and procedures are in place. * Ensure operational services meet accreditations and regulatory requirements. * Sample check and validate compliance documentation to provide assurance. * Ensure compliance against statutory requirements, corporate policy, and procedural arrangements. * Monitor the performance of planned preventative maintenance regimes and responsive repairs to ensure that electrical safety systems are maintained across MHA. * Present monthly performance report to ELT. * Escalate incidents or significant issues and dangerous occurrences to the Head of Estates, Health and Safety, and ELT * Ensuring that effective compliance assurance systems are established and maintained. * Check, validate and report all certification for planned maintenance, improvement and capital expenditure works against statutory requirements, policy, and procedural arrangements. |
| **Head of Estates (Operations)** | * Management and the delivery of services within the Estates Management directorate. * Ensure a robust management system is in place to manage the delivery of safety checks, planned preventative maintenance and installation of electrical safety systems for each operational department, home and scheme. * Ensure adequate, appropriate resources and facilities are allocated to administer, co-ordinate and enable effective planned preventative maintenance and cyclical servicing regimes for safety systems and building infrastructure are in place and are maintained to capture, review, prioritise and respond to any significant findings in line with this policy. * Ensure that effective communication exists for electrical safety between all departmental and operational functions. * Ensure during the specification, design, development, and build phase that electrical safety installations are installed, checked for quality and compliance, in a manner that supports this policy. * Escalate incidents or significant issues and dangerous occurrences to the Head of Health and Safety, Compliance Team, and Chief Operating Officer (COO). |
| **Head of Risk** | * Ensure that electrical safety updates and performance reports are provided to the Senior Leadership Team (SLT) on at least a monthly basis and to the Board on at least a quarterly basis through ELT escalation liaising with internal partners in the development of appropriate controls in the management of health and safety risks. * Ensuring that health and safety electrical safety audits and inspections are carried out in all areas. * Ensure accurate reporting of compliance and electrical safety management performance to the two ELT/The Board. * Escalate incidents or significant issues and dangerous occurrences to ELT/The Board. |
| **General Counsel / Company Secretary** | * Has responsibility for this policy and ensuring it is updated. |
| **Chief Operating Officer (COO)** | * Strategic and financial management of services within the Estates and Operations Management directorates. * Ensure that robust electrical safety management systems, arrangements and organisational responsibilities are established for each operational department, home, and scheme. * Ensure adequate, appropriate resources and facilities are allocated to administer, co-ordinate and achieve the objectives of the electrical safety management policy. * Ensure sufficient resources are allocated to enable effective planned preventative maintenance and cyclical servicing regimes for safety systems and building infrastructure are in place and maintained. * Ensure that sufficient resources and processes are in place to capture, review, prioritise and respond to any significant findings. * Maintain a broad awareness of current statutory requirements and principles of good practice for electrical safety management. * Ensure that electrical safety management estates updates and performance reports are provided to the Executive Leadership Team (ELT) on at least a monthly basis and to the Board on at least a quarterly basis. * Ensure that electrical safety management estates updates and performance reports are provided to the Executive Leadership Team (ELT) on at least a monthly basis and to the Board on at least a quarterly basis. * Escalate incidents or significant issues and dangerous occurrences to the General Counsel/ Company Secretary and the Chief Executive Officer, in the spirit of co-regulation as part of the Regulatory Framework. |

1. Training and Monitoring
   1. Compliance is assessed through direct observation, monitoring, and supervision of our colleagues.
   2. MHA is fully committed to continuous development and improvement of electrical safety performance. In order to meet this commitment, performance reporting in relation to electrical safety will be regularly reported to the Executive Leadership Team (ELT) and wider Leadership Team.
   3. In order to provide adequate assurance of asset information held, MHA will periodically undertake an asset data review to ensure that electrical safety data is accurate and up to date.
   4. This could be done by an outside contractor such as Morgan Lambert.
   5. In the event that a major non-conformance issue is identified (i.e. one which has a significant health and safety implication and/or is under RIDDOR, it will be immediately reported to the Chief Operating Officer, Head of Estates and the Head of Health and Safety. The Head of Estates and the Head of Health and Safety will agree an appropriate course of corrective action in order to address any non-compliance issues, and report details to the Executive Leadership Team (ELT).
   6. A compliance performance report will be produced and submitted to ELT on a quarterly basis by the Compliance Manager, although the Compliance Team monitor performance on a weekly/daily basis.
   7. An independent internal audit of electrical safety arrangements will be undertaken at least once every two years to check the systems and processes in place, as well as the effectiveness of key controls relating to operational compliance. The auditing team will produce a report with recommendations and management responses to be submitted to ELT, and the Audit and Risk Committee.
2. Communication and Dissemination
   1. This policy is disseminated and implemented within all MHA services through MHA’s channels of communication.
   2. Each colleague’s line manager must ensure that all teams are aware of their roles, responsibilities.
   3. This policy will be available to the people we support and their representatives in alternate formats, as required.
   4. Any review of this policy will include consultation with our colleagues, review of support planning, incident reports, quality audits and feedback from other agencies.
   5. Queries and issues relating to this policy should be referred to the Standards and Policy Team [policies@mha.org.uk](mailto:policies@mha.org.uk)
   6. **MHA policy documents, procedures, and guidance:**
   * Portable Appliance Visual Inspection Form
   * Information Governance Policy
   * Health and Safety Arrangements and Responsibilities Policy
   1. **External Resources**
   * [Electrical safety (HSE)](https://www.hse.gov.uk/electricity/)
3. Version Control

| Version | Version Date | Revision Description / Summary of Changes | Author and Review Panel | Next Review Date |
| --- | --- | --- | --- | --- |
| 3 | March 2024 | Regular compliance review. | Compliance Manager  Compliance  Technical Surveyor  Standards and Policy  Manager | March 2025 |
| 4 | April 2024 | Record retention periods clarified. | Standards and Policy  Manager | March 2025 |
| 5 | June 2024 | Resources updated. | Standards and Policy  Manager | March 2025 |
| 6 | November 2024 | * Electrical blankets section removed and included in Hot Water Bottles (inc. wheat bags and electric blankets) policy | Author  Head of Standards and Policy  Review Panel  Health and safety Manager | March 2026 |