

**Paragon Asra Housing Limited**

# **PA Housing ELECTRICAL SAFETY POLICY**

December 2021

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**Policy Owner**

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**Approved by**

**EMT**

**Next review date**

**December 2024**

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**Paragon Asra Housing Limited PA Housing is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.**

**We will make sure that all our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats, we will provide them.**

## 1. Policy Statement

- 1.1 **Paragon Asra Housing Limited PA Housing** owns and manages a range of assets including single dwellings and non-domestic assets. The key objective of this Policy is to describe how PA Housing will manage Electrical Safety Risk so far as is reasonably practicable. This includes:
- The identification of its specific responsibilities for each of its assets.
  - The creation of an Electrical Safety Management Plan (ESMP) and associated staff training to provide guidance on the implementation of the commitments contained in this policy.
  - The key activities (e.g., electrical installation condition reporting) that PA Housing undertakes.
  - Maintaining competent staff and contractors.
  - Communication internally and with customers and other stakeholders
  - How the PA Housing Board, as duty holder, will delegate responsibility for the implementation of policy, monitor its effectiveness and receive assurance of compliance.
- 1.2 The scope of this policy includes fixed wire testing; portable appliance testing; powered doors, gates, and barriers; and lightning protection systems.
- 1.3 PA Housing will seek to comply with all current and relevant statutory obligations, including the following where applicable:
- The Electricity at Work Regulations 1989 (EAWR).
  - The Building Regulations 2010.
  - Landlord Tenant Act 1985.
  - The Housing Act 2004.
  - The current edition of the IET Wiring Regulations - BS7671.
  - The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.
- 1.4 PA Housing takes the view that delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985 will also be met.
- 1.5 In addition, PA Housing must meet the requirements of both the Regulator for Social Housing's (RSH) Homes Standard and the requirements of the Care Quality Commission (CQC).
- 1.6 Our primary objective is to ensure that customers, contractors, staff, and visitors remain safe in our premises (both domestic and non-domestic). Failure to properly discharge our legal responsibilities may also result in:
- Prosecution under the Health and Safety at Work Act 1974, or Corporate Manslaughter and Corporate Homicide Act 2007.
  - Regulatory intervention by the RSH or CQC.

- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

1.7 This Policy statement establishes the broad framework for compliance with the key statutory and regulatory obligations.

## 2. Roles and Responsibilities

2.1 Detailed roles and responsibilities will be documented within the ESMP and associated Operational Guidance. The overarching roles and responsibilities are as follows:

The PA Housing **Board** has overall responsibility for approving this Policy, delegating responsibility for its implementation, monitoring its effectiveness at high level, and receiving assurance of compliance. The PA Housing Board will also ensure that there is a system in place that provides adequate protection from detrimental treatment or victimisation for anyone making disclosures that they genuinely believe to be necessary in the interests of Electrical Safety.

The **Audit Committee** will be responsible for ensuring that the PA Housing Board receives the assurance it requires.

The **Chief Executive Officer (CEO)** will be responsible for the implementation of the Policy and will allocate responsibilities within the Executive Management Team and ensure that there is adequate management, monitoring and visibility of performance. The CEO will recommend this Policy to the Board on behalf of the Executive Management Team (EMT).

The **Assistant Director of Asset Management & Compliancy** will take overall responsibility for the delivery of the Policy commitments described in the Data, Key Activities to Manage Risk and Communications sections of this Policy. The **Assistant Director of Asset Management & Compliancy** will attend the Audit committee meetings and ensure that areas of non-performance are reported and escalated where required. All potential, material non-compliance will be reported to the CEO/ EMT irrespective of whether this relates to a KPI scrutinised by the EMT or other groups.

The **Assistant Director of Asset Management & Compliancy** will take overall responsibility for planning and implementing the assurance activities described in this Policy and for the effective upward reporting of performance.

All Assistant **Directors** will take responsibility for ensuring that staff and contractors they employ have the skills, knowledge, and expertise necessary to deliver the commitments outlined in the Policy. Directors will identify Competent Person(s) (internal or external) suitable for the delivery of specific tasks.

**Competent Person(s)** will have a responsibility to identify any concerns about their own competency for the task that they are being asked to undertake and recommend additional competency is procured where required.

### 3. Management Plan

3.1 PA Housing will maintain an Electrical Safety Management Plan (ESMP) and associated Operational Guidance which shall:

- Provide additional guidance on how the commitments outlined within this policy will be implemented.
- Provide clear lines of responsibility for the management of electrical safety.
- Set out key operational processes.
- Ensure that a clear and consistent process is in place to obtain access to properties where this is required. This will include proactive assessment of available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.). Tenancy enforcement action will be used where required.
- Maintain a process for dealing with unsafe situations or incident.

3.2 All staff who have roles identified in the ESMP will receive associated training appropriate to their role.

### 4. Data

4.1 PA Housing acknowledges that to meet its obligations it must maintain a robust approach to identifying the Assets and components for which it has responsibility. PA Housing will:

4.1.1 Maintain an up-to-date master database of all properties that will indicate both where it does and does not have a responsibility for: Fixed wire testing; portable appliance testing; powered doors, gates, and barriers; and lightning protection systems. This will include the identification of properties where PA Housing has no responsibility but has an interest (e.g., a block managed by others but PA Housing owns a leasehold dwelling) or those where there is more than one responsible person.

4.1.2 Where a requirement for fixed wire testing exists, hold full copies of the current and previous Electrical Installation Condition Report (EICR) along with key reportable and auditable information from the same including but not limited to: the unique property reference (UPRN); asset and installation type; confirmation that the EICR was satisfactory or appropriate remedial works undertaken; date of last test; and date of next test (as recommended by the Competent Person undertaking the test). PA Housing will also hold specific information on where it is a Building Network Operator.

4.1.3 Where PA Housing has electrical appliances/equipment which are used by employees, or it has provided appliances/equipment for use by residents or visitors, hold reportable and auditable information including but not limited to: UPRN; type of equipment; inspection/testing frequencies; last date completed; and next date due. Records of at least the last two completions of each activity will be held. These will generally be held electronically but there may be

instances where a hard copy is kept on site and in this instance additional controls will be in place as detailed in the ESMP. In some cases, PA Housing may gift appliance/equipment to residents and these will not be recorded on the register where there is clear evidence that this is the case.

- 4.1.4 Where powered gates, doors or barriers exist, hold reportable and auditable information including but not limited to: UPRN; type of equipment; manufacturers' requirements and instructions (where available); associated testing/servicing frequencies; last date completed; and next date due. Records of at least the last two completions of each activity/equipment type will be held.
- 4.1.5 Where lightning protection systems exist, hold reportable and auditable information including but not limited to: UPRN; type of equipment; manufacturers' requirements and instructions (where available); associated testing/servicing frequencies; last date completed; and next date due. Records of at least the last two completions of each activity/equipment type will be held.
- 4.1.6 Maintain current and up to date, reportable and auditable records of remedial works arising from the EICRs or any other electrical safety related inspection or testing. The records will include: UPRN; detail of the work item required; priority and target completion date; person responsible; completion date and associated sign off; and evidence of completion.
- 4.1.7 Where PA Housing has no responsibility for an electrical safety activity described in this policy but has one or more residents living within a block where one may be required, PA Housing will write to the responsible person on a five yearly basis asking for written confirmation that:
  - They are fully aware of all relevant legislation and their obligations.
  - All relevant activity - including but not limited risk assessment, inspection, testing, remedial works, and maintenance - has been undertaken by a person competent to do so and is not overdue.
  - They are in full compliance with all relevant legislation.
  - PA Housing has been informed of any material issues relating to resident health and safety.

Where PA Housing does not receive an adequate response, it will take reasonable steps to follow this up. Further details will be contained within the Management Plan. Records will be kept for the current and previous year.

- 4.1.8 The approach to data control will be documented in the Data Management Protocol and ESMP.

## 5. Key Activities to Manage Risk

### 5.1 Electrical Installation Periodic Inspection and Testing

- 5.1.1 The reason for periodically inspecting and testing is to check whether an existing electrical installation is safe to remain in service. The procedure identifies damage, deterioration, defects and/or other conditions that effects electrical safety and gives rise to danger.
- 5.1.2 The completion of Electrical Installation Condition Reports (EICRs) provide PA Housing with a record of the condition of an electrical installation at the time of the inspection. As such they are PA Housing's method of assessing the risk of the installation remaining in service.
- 5.1.3 PA Housing will undertake suitable and sufficient EICRs to all assets containing a fixed electrical installation which it is responsible for. PA Housing will seek to undertake EICRs prior to the date recommended by the Competent Person undertaking the previous test but, in any event, at intervals not exceeding 5 years. For tenanted properties, PA Housing will provide the tenant with a copy of the certificate within 28 days of a test.
- 5.1.4 In addition to the cycle described above, all domestic electrical installations are to be inspected and tested prior to letting. If a property remains unoccupied for a period exceeding 6 months following its last test, a Competent Person will visually inspect the installation and decide if a further EICR is required. A copy of EICR will be provided to the tenant prior to occupation.
- 5.1.5 PA Housing will maintain an Electrical Testing Specification. This will establish the extent and limitations of inspection and testing and help to ensure that clear and consistent EICRs are produced.
- 5.1.6 In some instances, existing installations will not meet the latest Wiring Regulations. This does not necessarily mean that the installation is not safe. The EICR will include observations describing defects or items where improvement is required. The Electrical Testing Specification will establish how observations should be recorded and categorised. A summary of these along with the action PA Housing is committed to for each category is below:

Code	Description	Action
C1	Immediate danger present	Immediate remedial action required. Either complete whilst within the property or take necessary action to make safe.
C2	Potentially dangerous	Urgent action required. Do all that reasonably practicable to resolve on same visit and if not as soon as practicable but with a backstop target of 28 days.
C3	Improvement	Recommendations will be recorded and considered as part

Code	Description	Action
	recommended	of the next suitable planned improvement programme.
FI	Further investigation required in respect of an observation that could reasonably be expected to reveal a danger	Not generally applicable to the PA Housing portfolio but where raised the further inspection recommended will be undertaken as soon as reasonably practicable and within a timeframe agreed by a competent person.

5.1.7 Where C1, C2 or FI observations are recorded on an EICR as outstanding, the EICR will be unsatisfactory. The asset will not be considered compliant and will be reported as out of target until such time as there is appropriate evidence that the observations identified above has been adequately resolved. This evidence will be in the form of an Electrical Installation certificate (EIC) or Minor Electrical Installation Works Certificate (MEIWC) which will be retained with the EICR.

5.1.8 For new assets or installations that have been entirely replaced, PA Housing may hold an EIC. This would indicate the start of an installation's life, and the EIC shall state when the first EICR should take place. This would not exceed a period of 5 years in accordance with this policy.

5.1.9 In certain circumstances, PA Housing may be a Building Network Operator. This is where PA Housing owns the electrical installation between the 'intake' and the householder's installation. This is typically in a property that is split into more than one home. Where PA Housing is the Building Network Operator it is responsible for the design, installation, and maintenance of the electrical installation past the intake point. In these circumstances PA Housing will record its responsibilities and undertake an EICR as described above and in accordance with the Electrical Testing Specification. PA Housing acknowledges that work is required to understand current ownership of building networks more clearly and will seek to review its information in conjunction with the District Network Operator (DNO) and other relevant parties within 12 months of the approval of this policy.

5.1.10 Some of PA Housing's assets include Solar PV and other micro-generation equipment. Specific requirements for this equipment will be contained within the Electrical Testing Specification.

5.1.11 Whilst undertaking an EICR, PA Housing may identify electrical work that has been undertaken by the occupier. Where work that does not comply with the Wiring Regulations, PA Housing will take the appropriate action to remove or remedy. The cost of doing so may be recovered from the resident.

## 5.2 Portable/Moveable Appliances

PA Housing will manage the risk posed by portable or moveable electrical appliances



used by employees for the purpose of their work or provided by PA Housing to residents (excluding appliances gifted) by undertaking a reasonable combination of user checks and combined visual inspection and testing as described below:

- User checks- where users are PA Housing employees, they will receive training on basic user visual checks for certain appliances.
- Combined visual inspection and testing- PA Housing will undertake a programme of combined visual inspection and testing with the frequency of testing at intervals according to risk. General details on frequencies will be contained in the management plan but the frequencies on specific items and environments will be made by a competent person.
- New equipment should be supplied in a safe condition and not require a formal portable appliance inspection or test. However, a simple visual check is recommended to verify the item is not damaged. In addition, PA Housing will register devices where practicable so that it can be notified for any product recalls.
- For the purposes of efficiency and convenience for occupiers, electrical equipment is typically grouped together for testing at the same time. In this case PA Housing will use the shortest testing interval in the group rather than the longest.

### **5.3 Lightning Protection Systems**

PA Housing will inspect and test lightning protection systems in accordance with the current edition of BS EN 62305:3 on an 11-month cycle to allow for testing under varying climatic conditions.

### **5.4 Powered Gates, Barriers and Pedestrian Doors**

PA Housing will undertake a periodic risk assessment of all powered gates, barriers, and pedestrian doors. Risk assessments will be reviewed in accordance with the recommendation of the Competent Person undertaking the assessment. For newly installed systems, manufacturers/designers' installers will have to show how they have designed and constructed the equipment to be safe for the foreseeable lifetime, taking account of foreseeable misuse, as well as intended use.

Like most machinery, powered doors and gates need to be maintained to remain safe. PA Housing will inspect and maintain powered gate, barriers, and pedestrian doors in accordance with regulatory and statutory requirements and considering manufacturer's requirements. Frequencies and activities will be specific to the equipment but generally:

- Powered gates and barriers will be inspected and maintained 6 monthly.
- Powered doors will be inspected and maintained annually.

### **5.5 Remedial Actions**

Remedial actions arising from EICRs are listed above. All remedial actions arising from

the other inspection, testing or maintenance activity shall have clear recommended completion targets agreed by the Competent Person undertaking it. Any proposed changes to the agreed completion targets will be documented, agreed by a Competent Person, and proposed to the HSC for approval. The decision will be recorded and reported within the Key Performance Indicators (KPIs) to ensure clear visibility.

All remedial work shall be carried out in accordance with the relevant British Standard, approved code of practice or associated good practice guidance.

## **5.6 Domestic Smoke/Heat Detection**

In accordance with the PA Housing Fire Safety Policy, PA Housing will undertake a programme of upgrading to mains powered with standby battery systems across all dwellings over the next 5 years as part of the domestic EICR programme. The operation of existing mains wired smoke/heat detection will be checked during an EICR and any defective or expired detectors (including those likely to expire within the next 5 years) will be replaced.

## **5.7 Repairs, Maintenance and Planned Works**

There is a risk that repairs and maintenance activity unwittingly impacts electrical safety. Owing to the volume and nature of repairs works it is not practicable to undertake specific risk assessments of all jobs. PA Housing will manage this risk by ensuring that R&M contractors (internal and external) have a general awareness of electrical safety to inform dynamic risk assessment when undertaking responsive repairs. Electrical repairs will be carried out by a Competent Person and in accordance with the relevant British Standard, Approved Code of Practice or associated good practice guidance.

PA Housing will ensure that it has suitable evidence of compliance with regulations including:

- Electrical Installation Certificate (EIC) - on completion of any new, addition or alteration to an electrical installation.
- Minor Works Electrical Installation Certificate (MWEIC) – for an addition or alteration that does not extend to a new circuit.

For planned and major works programmes PA Housing will:

- Ensure anyone appointed to undertake design or construction activities can demonstrate the necessary competence to discharge their responsibilities relating to electrical safety.
- Request reasonable assurance that duty holders have demonstrated that resident safety can be assured during the works.
- Engage with residents on safety matters that affect them.
- Request reasonable assurance that duty holders have complied with the building regulations in relation to electrical installations where required

- Request reasonable assurance that there is an appropriate site inspection and sign-off programme in place for the stages of the work.

## **5.8 Resident Commissioned Works**

PA Housing will maintain a consent process for any resident commissioned works. Approval will not be unreasonably withheld, although consent may be refused or conditions imposed where appropriate.

Where unauthorised work with the potential to impact electrical safety is discovered, PA Housing will take the appropriate action to remove or remedy. The cost of doing so may be recovered from the resident.

## **5.9 Management**

PA Housing will:

- Implement a risk-based approach to the periodic inspection of communal areas to ensure areas containing electrical equipment are locked and no visible signs of vandalism or damage exist.
- Maintain a clear staged access process to get access to properties to undertake the activities described above. This shall include enforcement action when required. PA Housing will proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.).
- Enforce resident responsibilities where required considering a balance of individual residents' rights with the need for effective, timely action where there is a risk to the safety of other residents.

## **5.10 Construction**

There are detailed requirements on PA Housing as a Client during construction projects and these are considered elsewhere. However, in general PA Housing will ensure:

- It cooperates and shares information with stakeholders at key stages prior to and during construction.
- that the people it employs are competent to do the work they are undertaking.
- compliance with the building regulations and specific regulatory requirements imposed upon it.
- appropriate approvals are in place and that all information is handed to over to Operations prior to any occupation.

## 6. Communication with Stakeholders

### 6.1 Internal

Operate a HSC comprising of a cross organisation team of staff. Terms of Reference of the Group will be included in the Electrical Safety Management Plan ESMP.

### 6.2 Staff

PA Housing will train relevant staff where their work involves the use of electrical equipment

### 6.3 Residents

PA Housing will encourage electrical safety by the following actions:

- Periodically inform residents of the importance of reporting any issues with lifts through the provision of information via website, newsletters, and leaflets.
- Maintain a clear approach to gaining access to carry out works and be clear that enforcement action may be taken when it is necessary to do so.
- Maintain a clear complaints process and monitor and record complaints that indicate a risk to safety.

## 7. Monitoring and Assurance

### 7.1 Monitoring

7.1.1 The following Performance Indicators (PIs) and Key Performance Indicators (KPIs) will be reported to the Audit Committee (AC), Executive Team or Board at the frequencies outlined within the ESMP:

- Dwellings with a satisfactory EICR within its due date as a percentage of total dwellings requiring an EICR.
- Non-dwellings (including common parts and BNO installations) with a satisfactory EICR within its due date as a percentage of total non-dwellings requiring an EICR.
- Number of assets with unsatisfactory EICR i.e., outstanding C1, C2 or FI actions.
- Assets with portable/moveable appliances provided by PA Housing where all equipment has been inspected/tested in accordance with this policy as a percentage of total assets with such equipment.

- Assets with lightning protection systems where these have been inspected/tested in accordance with this policy as a percentage of total assets with lightning conductors.
- Assets with powered doors gates and barriers where all these components have valid risk assessments as a percentage to total assets with powered doors gates and barriers.
- Assets with powered doors gates and barriers where all these components have maintenance visits in accordance with this policy as a percentage to total assets with powered doors gates and barriers.
- Number of safety occurrences in the period- including any electrical safety incidents which posed a material safety risk and any external occurrence reporting (e.g., RIDDOR).

7.1.2 These PIs or KPIs will be reviewed periodically by the HSC and additional/amended measures may be recommended.

7.1.3 Where appropriate, KPIs will include the total number of actions or buildings required and the total number within target as well as percentage figure.

7.1.4 Commentary will be provided for any properties or actions out of date to include the date they became overdue, days overdue, and the action proposed to bring them back into a compliant position. To provide 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.

7.1.5 A detailed PI suite will be defined within the Management Plans and monitored by Operations Teams.

## 7.2 Assurance

The following assurance activity will be undertaken:

- Internal checking independent of the Operational Teams to provide additional assurance around the accuracy of data and reporting. The approach will be documented within the Data Management Protocol and will include sample testing of the accuracy of data and the operation of controls. The outcomes will be reported to the HSC.
- Internal audit to provide independent assurance on the operation and effectiveness of controls. Frequency agreed as part of the **Internal Audit Programme** and reported to Audit Committee.
- Works based quality assurance to test the quality of work delivered. This will be at levels detailed within the ESMP and reported to HSC.

## 8. Competence

8.1 It is not possible to succinctly define competence requirements for all roles and activities outlined in this Policy. In many areas, competence will be assessed based on skills, knowledge and experience as opposed to a single qualification or standard. As defined above, PA Housing has a system of Directors evaluating competence within their areas of responsibility and Competent Person(s) are required to highlight the limits of the competence.

8.2 However, in relation to electrical work, inspection and testing PA Housing will:

- Appoint a competent person internally or, if the skills do not exist internally, appoint an external competent person to provide retained advice and support in relation to electrical safety.
- Ensure that it holds or it engages with contractors who hold a current certificate covering the range of work being carried out, issued by a certification body accredited by UKAS to ISO/IEC 17065, or an equivalent (an example of this would be registration with the NICEIC, NAPIT or ECA Registered Member).
- Ensure that any employees undertaking electrical works, inspection or testing are suitably qualified to do so in someone with the skills, knowledge, experience, and training laid out in the latest update to the Electrotechnical Assessment Specifications.
- Get reasonable assurance that any contractor undertaking electrical work has suitably qualified staff.

8.3 Specific areas of competence relating to risk assessment, inspection and maintenance activity are listed within the ESMP along with a procedure outlining the reasonable steps PA Housing will take to ensure the competence of those carrying out work who are not under its direct control.

## 9. Consultation

9.1 This Policy is based on legislative and regulatory requirements and as such consultation with customers has not taken place. There has been consultation with Teams within PA Housing.

## 10 Equality Impact Assessment

10.1 An Equality Impact Assessment (EIA) will be undertaken on this Policy. See the full EIA document for further details.

## 11. Policy Review

11.1 The Policy will be reviewed upon any change to legislation or major guidance documentation, and at least every 36 months (or earlier if deemed necessary through the Monitoring and Assurance Process).

## 12. Amendment Log/Version Control

12.1 Revision Detail/Record:

<b>Date of Revision:</b>	<b>Record of Amendments:</b>	<b>Reason for Revision:</b>	<b>By Whom: Name and Title</b>