

Electrical Safety Policy

Date written: September 2020

Date(s) reviewed: September 2020, September 2021, September 2022

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

Scope: The scope of this policy includes fixed wire testing, portable appliance testing, automated doors, gates, barriers and door entry systems, lightning protection systems and CCTV.

The maintenance of fire safety systems (Emergency Lighting, AFD and alarm systems, fire suppression systems and Smoke Control Systems), and fire-fighting equipment falls within the remit of this policy.

Commercial Extraction systems and Air Conditioning Units are also covered.

Bernicia have a building (Northumbria Lodge) with Electromagnetic Field (EMF) generating equipment located upon the roof. The Management Plan will provide guidance on access and controls to the roof area and the equipment to prevent accidental exposure to high levels of EMFs.

Definitions: Electrical Safety includes for equipment which directly or indirectly serves the property and is installed in any part of the property in which the landlord has an interest or is owned by the landlord or is under Bernicia management.

Associated documents:

Electrical Management Plan

Electrical Safety Operational Guidance

Date for review: September 2023

Responsibility: Head of Compliance

Policy

1. Introduction

- 1.1 At the time of Policy approval Bernicia owns and manages in the region of 14,000 tenanted properties. Electrical installations and equipment within the housing stock and communal areas managed by Bernicia need to be kept safe and regularly maintained.

This policy explains how Bernicia's commitment to electrical safety will be met. It is supported by the Compliance Strategy and a Electrical Safety Management Plan which provides detailed guidance and procedures.

2. Policy statements

- 2.1 The key objective of this policy is to describe how Bernicia will meet the required statutory and regulatory requirements in relation to Electrical Safety. It will also cover how the Bernicia Board, as Duty Holder, will receive assurance of compliance.

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Bernicia have a building (Northumbria Lodge) with Electromagnetic Field (EMF) generating equipment located upon the roof. The Management Plan will provide guidance on access and controls to the roof area and the equipment to prevent accidental exposure to high levels of EMFs.

New installations will be included within the scope of this policy.

Bernicia will comply with all current and relevant legislation; specifically, as detailed in the following:

Testing of Fixed Wiring Systems

- The IET 18th Edition of the Wiring Regulations 2018:BS7671
- The Electricity at Work Regulations 1989 (EAWR)
- Building Regulations.

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.”

Powered Doors, Gates and Barriers and Door Entry

- 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;
- Supply of Machinery (Safety) Regulations 2008 and BSEN 12453:2001
- BS EN 16005 Standard for Automatic Doors.

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.

Fire Safety Systems

- Will be inspected, tested, and maintained at frequencies determined through manufacturer’s guidelines.

Commercial Extraction and Air Conditioning Units

- Will be inspected, tested, and maintained at frequencies determined through manufacturer’s guidelines.

Bernicia also acknowledges its obligations under the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985.

In addition, as a Registered Provider Bernicia must meet the requirements of the Regulator for Social Housing’s (RSH) Homes Standard.

It is essential to ensure customers, residents, employees and visitors remain safe in Bernicia’s premises (both individual homes and offices). Failure to properly discharge its legal responsibilities may result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- RSH’s serious detriment judgement

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

2.2 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, Bernicia will:

Process

- Provide clear lines of responsibility for the management of fixed wiring systems; portable appliance testing; powered doors, gates, barriers and door entry; lightning protection systems; and fire safety systems; extraction and air conditioning units supported by written guidance in the Electrical Safety Management Plan.
- 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.
- Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.) .
- Maintain a process for dealing with unsafe situations in accordance with the regulations.

Delivery

Fixed Wire Testing

- Ensure all commercial properties 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.
- 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). Hold a valid EICR for all properties.
- Aim to achieve the above by delivering an agreed programme to move to the 5-year cycle within the domestic housing stock by 31 March 2024, by which time Bernicia will hold a valid EICR completed within the last 5 years for all properties.
- Ensure all domestic electrical installations are tested and certified prior to letting. If a property remains unoccupied for a period exceeding 6 months following its last test, a further EICR will be completed prior to occupation.

- In addition to checking all installations maintained by Bernicia, inspect any electrical work carried out by the tenant at the same time. Any works found to be unsafe, or not complying with regulations will be disconnected and made safe appropriately at the time of inspection. 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.
- Prioritise remedial works arising from fixed wire testing and apply a timescale for action, as detailed within the Electrical Safety Management Plan. All C1 (immediately dangerous) works will be resolved immediately. We will aim to complete all C2 works (potentially dangerous) at the time of the inspection and testing. The property will only be considered compliant once evidence is provided that all C1 and C2 works are resolved. A certificate will be deemed unsatisfactory if any FIs (Further Investigation) remain unresolved.
- Any C3s identified within the EICR will be recorded on a risk register for future action at the appropriate time (void or major works)

Portable Appliance Testing

- Risk assess all appliances provided by Bernicia which are used by employees, residents, customers, and visitors and 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. Bernicia will retain appropriate documentation.
- Establish a cycle of subsequent re-testing at the time of the first test.

Automated Doors, Gates and Barriers, Door Entry Systems

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

Lightning Protection Systems

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

Fire Safety Systems

- Inspect, test and maintain systems in accordance with the manufacturer's guidelines and as proposed within the Electrical Safety Management Plan. Bernicia will retain appropriate documentation.

Commercial Extraction and Air Conditioning Units

- Inspect, test and maintain systems in accordance with the manufacturer's guidelines and as proposed within the Electrical Safety Management Plan. Bernicia will retain appropriate documentation.
- Take appropriate steps to prevent the growth of Legionella bacteria in accordance with the Water Safety Policy and Management Plan

Additional Safety Measures

- Require that tenant installations should be subject to prior agreement before works are undertaken. 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 Bernicia's appointed contractor.

Contractors Competency

- Only engage with suitably qualified electrical contractors to undertake work on electrical installations. The National Inspection Council Electrical Installation Contractors (NICEIC) or equivalent.
- Expect that contractors shall demonstrate that all engineers engaged in work for Bernicia shall meet the required standard of training.
- 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).
- Fire Safety System Contractors, where possible, should be third party accredited to a nationally recognised scheme, such as BAFE SP203 (relevant part) for fire alarm contractors, BAFE SP101 for firefighting equipment etc. (or equivalent).
- Carry out an assessment of all contractor competencies annually or at change of contract /contractor, as detailed within the Electrical Safety Management Plan.

Internal Competency

- Maintain a skills/training matrix to ensure that all relevant staff undertaking key roles within the scope of this policy have appropriate training.

- Will operate a detailed competence framework including regular appraisals as part of the Electrical Safety Management Plan.

Data

- Maintain an up to date Master 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 fire safety systems.
- For each relevant property record and maintain up to date data confirming which of the systems and appliances within the scope of this policy exist and do not exist and the organisation's associated responsibility
- Where a requirement exists hold data and certification relating to the last two safety checks and record the next due date
- Where a requirement does not exist hold appropriate evidence
- Maintain current and up to date records of remedial works for all properties which will detail all recommendations from the fixed wire testing. 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 and who it was signed off by, and evidence of completion

Assurance

- Ensure that all persons involved with the installation, inspection and servicing of electrical systems and appliances are properly trained and accredited.
- 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.
- Set a timetable for the review of the Electrical Safety Policy and the associated Management Plan.

Communication

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

3. Responsibility for implementation

- 3.1 The policy was implemented on November 2020 following Executive Teams approval and will be reviewed annually.

Staff will be made aware of the policy via an agreed training programme. A copy of the policy will be available on the staff intranet and will also be uploaded to the Bernicia website.

4. Actioning the policy

- 4.1 The Head of Compliance will be responsible for the actioning of this policy.

5. Monitoring the policy

- 5.1 A detailed performance management suite is defined within the Electrical Safety Management Plan.

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

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. Commentary will also be provided if any properties have outstanding overdue actions. 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.

The following assurance activity will be undertaken and reported in line with the Management Plan:

- Internal audit
- Non Negotiable Compliance Testing
- Strategic review
- 3rd Party Assurance

6. Resources

- 6.1 Within existing resources and external partners

7. Equality and Diversity

- 7.1 We believe all people should be treated with dignity and respect regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including, nationality, ethnic or national origins), religion, belief or non-belief, sex, or sexuality or by association with someone with any of these characteristics or perception of having any of these characteristics.

The Policy Planning Document (PPD) was undertaken in September 2022. (See the PPD document for further details)

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