

Electrical Safety Policy

Version Number: 6.0

Effective From: September 2025

Applicable To: This policy applies to all properties Bernicia owns and manages.

Equality, Diversity & Inclusion: An ED&I Assessment was completed in September 2024. Please contact the Governance team if you require a copy.

Approved By: Executive Director, Assets and Growth

Policy Author: Head of Compliance

Policy Owner: Director of Assets and Growth

Next Review: September 2026

Reference Number: POL-0158

1. Policy Scope

At the time of policy approval, Bernicia owns and manages around 14,000 tenanted homes. Electrical installations within these homes, along with electrical systems in our communal and non-domestic properties, must be kept safe, regularly inspected and properly maintained.

This policy sets out how Bernicia will meet its commitment to electrical safety. It is supported by the Electrical Safety Management Plan and associated operational guidance, which provide the detailed procedures and controls required to manage electrical safety effectively.

The key objective of this policy is to demonstrate how Bernicia will meet all statutory, contractual and regulatory requirements relating to the safe installation, inspection, testing and maintenance of electrical systems and equipment. It also outlines how the Board, as Duty Holder, will receive assurance that these responsibilities are being met.

The scope of this policy includes fixed wiring systems, consumer units, portable appliances provided by Bernicia, powered doors, gates and barriers, lightning protection systems, fire safety systems, commercial extraction and air-conditioning units, CCTV, and all associated electrical testing and maintenance activities. It also covers fixed wire testing, portable appliance testing, automated doors, gates, barriers and door-entry systems, and the maintenance of emergency lighting, automatic fire detection and alarm systems, fire suppression systems, smoke control systems and fire-fighting equipment.

In addition, this policy applies to commercial extraction systems and air-conditioning units. Bernicia also manages a building (Northumbria Lodge) that has Electromagnetic Field (EMF) generating equipment located on the roof. The Electrical Safety Management Plan provides guidance on safe access arrangements, roof-level controls and measures to prevent accidental exposure to high levels of EMFs.

The Electrical Safety Policy will be implemented in line with all relevant legislation, including but not limited to:

- Electricity at Work Regulations 1989 – places duties on employers to maintain electrical systems to prevent danger.
- The Landlord and Tenant Act 1985 – requires landlords to ensure electrical installations are safe at the start of a tenancy and maintained throughout.
- Housing and Planning Act 2016 – underpins requirements for electrical safety in rented homes.
- Health and Safety at Work etc. Act 1974 (HASAWA) – requires Bernicia to ensure the health, safety and welfare of employees, contractors and members of the public.
- Management of Health and Safety at Work Regulations 1999 – requires risk assessments, safe systems of work and the monitoring of contractors.

- Regulatory Reform (Fire Safety) Order 2005 – applies to non-domestic premises and communal areas where electrical systems could affect fire safety.
- Awaab's Law (Guidance 2025) – places additional requirements on landlords regarding property condition and safety.

Bernicia will also assess circumstances where electrical equipment within individual dwellings may fall under workplace legislation—for example, where support services are delivered within the home—and will apply the relevant regulatory duties accordingly.

Housing and Building Regulations

- Housing Act 2004 – includes the Housing Health and Safety Rating System (HHSRS), which helps identify and address hazards that could cause harm to occupants or visitors.
- Awaab's Law (guidance) 2025
- Building Regulations
- Energy Performance of Buildings Regulations 2012
- The Landlord and Tenant Act 1985.
- Housing Health and Safety Rating System (HHSRS) - specific requirement to assess risks to health and safety in residential properties.
- Regulatory Reform (Fire Safety) Order 2005 – applies to non-domestic premises and the communal areas of multi-occupied residential buildings, including electrical systems within those areas where they could affect fire safety.
- Regulator of Social Housings (RSH) Homes standard – requires landlords to ensure the health and safety of tenants.

Industry Standards

Bernicia will work to recognised industry standards to maintain safe and compliant electrical systems, including:

- BS 7671 (IET Wiring Regulations) – requirements for electrical installations
- IET Code of Practice for In-Service Inspection and Testing of Electrical Equipment – sets standards for Portable Appliance Testing (PAT).
- BS EN standards relevant to powered doors, gates, and barriers
- Lightning protection standards (e.g. BS EN 62305)

It is essential to ensure that tenants, residents, employees, and visitors remain safe in Bernicia' premises (both individual homes and offices). Failure to properly discharge our legal or regulatory responsibilities may also 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 intervention judgement
- Reputational damage
- Loss of confidence by stakeholders in the organisation

To comply with all relevant regulatory standards and legal obligations, and to safeguard the health and safety of its tenants, staff, contractors, and visitors, Bernicia is committed to ensuring that the standards set out in this policy are fully implemented and maintained.

2. Policy Standards

Standard 1: Process

At Bernicia, we have clear lines of responsibility for the management of electrical safety. This includes fixed wiring systems, portable appliance testing, powered doors, gates and barriers, door-entry systems, lightning protection, fire safety systems, and extraction and air-conditioning units. Our colleagues are supported by written guidance in the Electrical Safety Management Plan to ensure compliance and safe working practices.

We will work with tenants to arrange convenient appointment times for electrical safety checks and will use any information tenants have given us—such as communication needs, vulnerabilities or preferred contact times—to help us gain access more easily.

Where access cannot be gained after several reasonable attempts, we may use legal powers to enter the home to carry out these essential safety checks. This is always a last resort and will only be used to protect the health and safety of everyone in the property and surrounding homes.

We will ensure that a clear and robust process is in place for managing any unsafe electrical situations, in line with all regulatory requirements and industry best practice.

We will ensure that emergency procedures, including electrical isolation, unplanned outages, and emergency response protocols, are followed in line with the arrangements set out in the Electrical Safety Management Plan.

We will require contractors undertaking higher-risk electrical activities to follow Bernicia's Permit to Work process, ensuring that such tasks are completed safely and under appropriate controls.

We will comply with the reporting requirements of RIDDOR 2013 where electrical incidents meet statutory thresholds, including electric shock injuries and fires caused by electrical faults.

Standard 2: Safety Checks

Fixed Wire Testing

At Bernicia, we are committed to keeping our properties safe by ensuring all electrical installations are properly inspected, tested and maintained.

We will make sure all commercial properties and communal areas have a valid Electrical Installation Condition Report (EICR) within the timescales set by the competent person carrying out the test and never exceeding five years.

All domestic electrical installations will be tested and certified before a property is let to a new tenant.

During these inspections, we will also check any electrical work carried out by tenants. If any work is found to be unsafe or non-compliant with current regulations, it will be disconnected and made safe at the time of the inspection. These will be recorded on the relevant paperwork and added to the Master Database.

We will prioritise any remedial work identified during fixed wire testing in line with our Electrical Safety Management Plan.

- C1 (immediately dangerous) defects will be resolved straight away.
- We will aim to complete C2 (potentially dangerous) defects during the inspection and testing visit.
- A property will only be considered compliant once all C1 and C2 issues have been fully resolved, and an EICR will be classed as unsatisfactory if any FI (Further Investigation) items remain outstanding.
- Any C3 recommendations will be added to a risk register and addressed at the most appropriate time, such as during void or major works programmes.

Portable Appliance Testing

We will risk assess all electrical appliances provided by Bernicia and used by employees, residents, customers and visitors. Portable Appliance Testing (PAT) will be carried out in accordance with the risk-based schedule set out in the Code of Practice for In-service Inspection and Testing of Electrical Equipment. We will keep all relevant documentation.

A cycle of re-testing will be established from the first test.

Automated Doors, Gates and Barriers, and Door Entry Systems

Inspection frequencies and procedures will be set out in the Electrical Safety Management Plan. As a minimum, all systems will be inspected annually, and all documentation will be retained.

Lightning Protection Systems

Inspections and testing will take place on an 11-month rolling programme to ensure systems are checked under a range of climatic conditions. All documentation will be retained.

Fire Safety Systems

We will inspect, test and maintain all fire safety systems in line with manufacturers' guidelines and the Electrical Safety Management Plan, and retain all relevant documentation.

Commercial Extraction and Air Conditioning Units

All extraction and air-conditioning systems will be inspected, tested and maintained in accordance with manufacturer guidance and the Electrical Safety Management Plan, with documentation retained.

We will also take the necessary steps to prevent the growth of Legionella bacteria, in line with our Water Safety Policy and Management Plan.

Standard 3: Additional Safety Measures

We may require tenants, licensees, or occupiers to obtain written permission from the landlord or managing agent before installing any equipment, aids, adaptations, or making alterations to the property. No changes or structural modifications may be carried out without prior approval.

This protects tenants by ensuring any installations are safe, suitable, and compliant with legal and regulatory requirements, and protects property owners by preserving the integrity, safety, and value of the property. Any unauthorised work may be removed or reversed at the tenant's expense, and the property must be returned to its original condition upon request.

Standard 4: Competency

At Bernicia, we will only work with contractors who can demonstrate they are competent, qualified and capable of carrying out electrical and fire-safety-related work safely and to the required standards.

We will only engage suitably qualified electrical contractors to work on our electrical installations, including those accredited by the National Inspection Council for Electrical Installation Contracting (NICEIC) or an equivalent approved body.

Contractors must be able to demonstrate that all engineers working on Bernicia properties meet the required level of training, skills and competence.

Where possible, contractors working on fire safety systems should hold third-party accreditation under a nationally recognised scheme, such as BAFE SP203 (relevant modules) for fire alarm systems or BAFE SP101 for firefighting equipment, or an equivalent certification.

Bernicia will assess contractor competency on a regular basis, carrying out a formal review each year and whenever contracts or contractors change, as detailed in the Electrical Safety Management Plan. This ensures all appointed contractors continue to meet our standards and work safely.

We will maintain a comprehensive skills and training matrix to make sure all relevant staff undertaking key roles within the scope of this policy receive the appropriate training.

Bernicia will operate a detailed competency framework, including regular appraisals and development reviews, as part of the Electrical Safety Management Plan. This approach ensures staff remain competent, supported and fully equipped to deliver safe and compliant services.

Standard 5: Data Management

Bernicia will maintain accurate and up-to-date records for all properties where we are responsible for delivering electrical safety checks and maintenance. This includes information relating to fixed wiring systems, portable appliances, powered doors, gates and barriers, lightning protection systems and fire safety systems.

For each relevant property, we will record and maintain current data confirming which systems and appliances covered by this policy are present, and where they are not. We will also hold appropriate evidence where a requirement does not apply, to ensure our records remain complete and transparent.

Bernicia will keep up-to-date records of all remedial works arising from fixed wire testing. These records will include the property address and risk profile, the details of the required work, priority level and target completion date, the person responsible, confirmation of completion and who signed off the work, along with evidence that the work has been carried out. This helps ensure all recommendations are tracked, managed and completed in line with safety and compliance requirements.

Standard 6: Assurance

Bernicia will make sure that everyone involved in installing, inspecting, or servicing electrical systems and appliances is properly trained, competent and appropriately accredited to carry out their role safely and in line with legal requirements.

We will carry out works-based assurance activities, including checking certification and completing post-inspection quality checks on a sample of onsite works, in accordance

with the levels set out in the Electrical Safety Management Plan. A proportion of these checks will be completed by an independent party to ensure impartiality and robust oversight.

Bernicia will set and follow a regular timetable for reviewing the Electrical Safety Policy and the associated Electrical Safety Management Plan. This ensures our approach remains effective, compliant, and aligned to current standards, regulations and best practice.

Standard 7: Communication

Bernicia is committed to providing clear and straightforward information to help tenants understand the importance of safety checks and encourage their cooperation in allowing access for these essential visits.

We ensure that staff, contractors, and tenants can easily communicate with one another, to share important safety information.

We have established simple and accessible ways for tenants to provide feedback or raise concerns. These routes are designed to be user-friendly, and feedback is taken seriously, with all issues addressed promptly and appropriately.

Standard 8: Monitoring

Bernicia maintains a detailed performance management suite, as defined in the Electrical Safety Management Plan, to regularly monitor how well we are meeting our safety responsibilities. We track key performance indicators (KPIs), including how often we gain access to homes for service and inspection and when access is not obtained, along with any actions taken to address these issues.

For any properties with overdue service and inspection, we provide comprehensive commentary that includes the date the check became overdue, how many days have passed, and the property's status within our access process to restore compliance. We also highlight any outstanding overdue actions.

Our reporting includes information on the proportion of safety activities completed before and after their due dates within the reporting period, offering additional insight into our performance.

To ensure compliance and quality, we undertake a range of assurance activities, including internal audits, non-negotiable compliance checks, strategic reviews, and third-party assurance inspections. Spot checks and audits verify that our records are accurate, and contractors are performing their duties to the required standard.

Findings from these assurance activities are regularly shared with senior management, the Board, and relevant committees. When areas for improvement are identified, we take prompt action to address them and closely monitor progress.

The insights gained from these monitoring and assurance processes are used to continuously improve our Electrical Safety Management Plan and ensure the highest safety standards across our housing portfolio.

3. Definitions

Word/Phrase	Definition
Electrical Safety	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.
C1 – Immediately Dangerous	A classification used in Electrical Installation Condition Reports (EICRs) indicating a defect that presents an immediate risk of electric shock or fire. The installation must be made safe immediately, either by repair or isolation at the time of the inspection.
C2 – Potentially Dangerous	A defect that does not pose immediate danger but has the potential to become hazardous. Urgent remedial action is required within defined timescales to prevent risk.
C3 – Improvement Recommended	An advisory classification indicating that an aspect of the installation does not meet current standards but is not unsafe. Remedial work is recommended to improve safety or compliance but is not mandatory.
FI – Further Investigation	A classification applied when an inspector cannot verify the safety or compliance of part of the installation without additional checks. Any FI recorded means the EICR is unsatisfactory until further investigation is completed.
EICR – Electrical Installation Condition Report	A formal report produced following inspection and testing of an electrical installation. It identifies any defects, safety concerns, or non-compliance issues and provides coding (C1, C2, C3, FI) and recommendations for remedial work.
BAFE – British Approvals for Fire Equipment	A recognised third-party certification body that operates schemes for organisations working on fire detection, fire alarm systems, and firefighting equipment (e.g., BAFE SP203 and SP101). Used to confirm the competency of contractors undertaking fire-related electrical work.
EMF – Electromagnetic Fields	EMFs are energy areas produced by electrical equipment; safe access requirements apply where EMF equipment is installed.

4. Change Control

Version Number	Effective Date	Amendment made by	Version approved by	Description of changes
1.0	September 2020	Head of Compliance	Executive Director, Assets and Growth	Scheduled review
2.0	September 2021	Head of Compliance	Executive Director, Assets and Growth	Scheduled review
3.0	September 2022	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
4.0	September 2023	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
5.0	September 2024	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, role profile changes
6.0	September 2025	Head of Compliance	Executive Director, Assets and Growth	Scheduled review, transferred to new policy template, additional legislation added, policy statement changed to standards.