

Policy Statement & Purpose

Bromford are fully committed to meeting all relevant statutory & regulatory requirements, including best practice standards, in electrical safety management and also ensuring continual improvement in compliance performance, adopting a zero-tolerance approach to any deviation from this policy.

The purpose of this policy is to demonstrate Bromford's commitment to ensuring that the risk to people, buildings and the wider business are reduced as far as reasonably practicable, whilst ensuring that all legislative requirements are met. This policy will be supported by a detailed electrical safety procedure to ensure the policy is fully embedded into routine working practice across the business.

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1. Scope

1.1 The Electrical Safety Policy and associated procedure, details how Bromford meets the requirements of the Code of Practice for the Management of Electrotechnical Care in Social Housing and all associated legislation and regulations. In addition to this, the policy provides assurance to Bromford that measures are in place to identify, manage and/or mitigate risks associated with electrical safety. Bromford will ensure compliance with electrical safety legislation and codes of practice and formally report at Executive and Board level, the details of any non-compliance and planned corrective actions.

1.2 The policy is relevant to all Bromford colleagues, customers, contractors and other persons or stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon Bromford to maintain a safe environment for customers and colleagues within our buildings.

1.3 Bromford will follow a systematic approach to the management of electrical safety to ensure it meets the requirements set out in the Code of Practice and other relevant legislation relating to electrical safety. This is to ensure the safety of customers, leaseholders, colleagues and members of the public.

1.4 This policy applies to all Bromford domestic properties, communal areas, offices and buildings under its control or occupation. It also applies to any of our housing blocks and support schemes where the building is under our management. Where the building is controlled or managed by a third party, then the responsibility for electrical safety in their designated areas must be agreed, formally documented and subsequently monitored, with the management company or commercial tenant unless this is otherwise stated in the management contract.

1.5 Bromford is not responsible for customer owned electrical appliances.

2. Reference Materials

List of Referenced Documents
<u>Electric Safety Procedure</u>

3. Responsibilities

3.1 The Board is responsible for:

- Ensuring Bromford complies with legislation
- Ensuring effective controls are in place to manage electrical safety effectively
- Reviewing compliance reports and scrutinising areas of non-compliance.

3.2 The Executive Team is responsible for:

- Reviewing, endorsing and achieving this policy's aims
- Ensuring the appropriate resources and performance management frameworks are in place to ensure compliance with applicable laws and regulations
- Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance.

3.3 The Audit and Risk Committee are responsible for:

- Reviewing Compliance reports and control frameworks and make recommendations to Board.
- Providing assurance to Board on compliance with the law.

3.4 The Risk and Compliance Forum is responsible for:

- Approving this policy and related procedures
- Approving amendments to this policy

3.5 The Competent Person Scheme Principal duty holder is responsible for:

- Carry out all role requirements as defined by the relevant scheme
- Ensure Bromford comply with all requirements and responsibilities of the relevant scheme rules.

3.6 The Competent Person Scheme Lead Qualifying Supervisor is responsible for:

- Carry out all the role requirements as defined by the relevant scheme
- Ensure the quality and compliance of Electrical work completed by Bromford

3.7 All colleagues are responsible for:

- Carrying out their work in line with this policy and associated procedures and processes
 - Applying Bromford's DNA in everything they do
 - Reporting non-compliance to line management as soon as practically possible
 - Considering electrical safety in all our activities and notifying compliance leads of any activity which puts compliance at risk.
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4. Legislative Requirements

4.1 Our policy is to comply with all applicable legislation and regulatory requirements, including the following:

4.2 Regulatory Standards

The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was updated by the Homes & Communities Agency (HCA) in April 2015.

4.3 Legislation

The principal legislation applicable to this policy are as follows:

- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Electrical Equipment (Safety) regulations 2016
- The Electricity at Work Regulations 1989
- Health & Safety at Work etc Act 1974
- Building regulations Electrical Safety - Dwellings - Part P 2013
- Landlord and Tenant Act 1985 as amended
- The Housing Act 2004 (England and Wales)

4.4 Code of Practice & British Standard

The principal Code of Practice and British Standards applicable to this policy are:

- Code of Practice for the Management of Electrotechnical Care in Social Housing- January 2019.
 - BS7671:2018 The IET Wiring Regulations and IET Guidance Note 3 – Inspection & Testing
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5. Policy Principles

5.1 Bromford are committed to providing a robust, safe, efficient and cost-effective service to our customers in relation to the management of electrical safety. In respect of our responsibilities for electrical safety BHG will:

- Retain an adverse risk appetite in matters relating to electrical safety.
 - Ensure robust electrical safety procedures are in place and adhered to by all colleagues. This will be achieved by providing relevant training for all colleagues involved with electrical safety.
 - Adopt programmes of periodic electrical inspection for our housing stock in accordance with BS7671:2018 The IET Wiring Regulations (including current amendments) and IET Guidance Note 3 – Inspection & Testing and the timescales prescribed in the Code of Practice for the Management of Electrotechnical Care in Social Housing. Generally, this will be every 5 years and at each change of tenancy unless external influences or environment conditions, to which the electrical installation is exposed, dictate otherwise or unless the test and inspection advises otherwise.
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- Solar PV Conduct an inspection as part of the 5-year cyclical testing program. Bromford Flagship will retain appropriate documentation.
 - Electrical Vehicle Charging · Conduct an inspection of the fixed wiring installation that serves the charging point as part of the 5-year Electrical Installation Condition Report. Bromford Flagship will retain appropriate documentation.
 - Adopt programmes of periodic electrical inspection for relevant non-domestic properties in accordance with BS7671:2018 The IET Wiring Regulations and IET Guidance Note 3 – Inspection & Testing. Generally, this will be every 5 years and at each change of tenancy unless external influences or environment conditions, to which the electrical installation is exposed, dictate otherwise or unless the test and inspection advises otherwise, such as every 3 years for water/sewage treatment plants.
 - Ensure any immediately dangerous defects are addressed as a matter of urgency and properties are not left in an unsafe condition. Any identified Classification Code C1 observations where immediate danger is present, will be rectified or that part of the electrical installation isolated with immediate effect. Under no circumstance will a Classification Code 1 observation remain outstanding following completion of an Electrical Installation Condition Report.
 - Ensure a robust process is in place for the management of any follow up works required following completion of an EICR.
 - Ensure effective capture, monitoring and delivery of responsive repairs. Any reported defects, via the responsive repairs workstream, will be scheduled and executed within an appropriate timeframe in relation to the level of risk.
 - Consider carrying out Domestic Visual Inspections at periods between EICR visits as necessary/appropriate.
 - Ensure that any property acquisitions, including new build properties for which Bromford have maintenance responsibility are incorporated into the electrical test and inspection programmes. Current valid installation certificates to be held in Bromford’s document management system at point of handover.
 - Ensure that all Bromford electrical portable appliances are tested periodically in accordance with the testing guidance set out in ‘The Code of Practice for In-Service Inspection and Testing of Electrical Equipment’ (ISITEE) and in accordance with the Bromford Risk Assessment.
 - Ensure periodic testing of all handheld portable repair and maintenance tools, including charging equipment for battery operated tools is carried out.
 - Carry out all required planned and preventative maintenance (PPM) schedules and inspections to ensure our electrical systems remain safe.
 - Maintain a property database that clearly details the property’s electrical safety history, records and date next due, details of any electrical appliances installed and access procedure records and timescales etc. Records to be accessible at all times.
 - Ensure asset data bases and customer records are maintained accurately and data reconciliations continue to be carried out frequently, as defined in the supporting procedure.
 - Ensure emergency procedures are in place, reviewed regularly and available to all colleagues and relevant third parties.
 - Ensure relevant monitoring and auditing regimes are in place and to submit compliance reports regularly to Board, the Executive and the Risk & Compliance Forum.
 - Report critical exceptions to an Executive Director in agreed timescales.
 - Ensure every contractor or consultant employed by Bromford to carry out works in our homes and buildings has the relevant licenses, registrations, accreditations, competencies and qualifications, as specified by the relevant regulations and Bromford procedures.
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- Ensure colleagues receive appropriate training to fulfil their duties in relation to managing electrical safety.
 - Have a robust process in place to gain access to homes and property for undertaking essential electrical safety inspection and works, in accordance with Bromford’s access procedures.
 - Take appropriate legal action where customers refuse or fail to facilitate access to their home to undertake a test and inspection.
 - Fulfil our commitment to equality and diversity while delivering electrical services to our customers.
 - Engage with customers and leaseholders in a participative and empowering manner so that they can contribute to service provision in relation to electrical safety.
 - Ensure effective communication of the Electrical Safety Policy and its associated procedures.
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6. Assurance Framework

6.1 The Legal and Regulatory risk appetite of Bromford’s Board is generally minimal, and it is risk averse with respect to landlord asset compliance. As such we always do everything reasonably practicable to ensure legal and regulatory compliance. Our compliance management comprises high-level oversight and assurance at Board and Executive level, mid-level oversight at Senior Leadership level and detailed scrutiny at management level.

6.2 This policy assists with mitigating the risk identified in our risk register, namely ‘We fail to ensure safety and asset compliance across our homes resulting in death or injury to customers, colleagues or a third party’.

9.3 A system of audits in line with our 3 lines of assurance will ensure that all aspects of this policy and any controls implemented, will be monitored to ensure its effectiveness.

7. Performance Monitoring

7.1 The following KPI’s are measured across the Group and reported to the Executive:

- Number of overdue Electrical Installation Condition Reports (EICR’s)
 - % properties with a valid EICR
 - Date of oldest out of date EICR
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8. Training

8.1 Training will be provided to colleagues responsible for electrical safety as detailed in the associated Electrical Safety Procedure.

9 Communication and Review

9.1 This policy is published on the Hub intranet site.

9.2 This policy will be reviewed annually and in line with changes to government guidelines.

Document Details

Owner:	Head of Compliance
Approved By:	Risk and Compliance Forum
Date of Approval:	30 October 2024
Next Review Due:	30 October 2025
Policy Version:	V3
Share to website:	Yes
