

CROYDON COUNCIL



Electrical Safety Policy

The Policy outlines the London Borough of Croydon's approach to managing Electrical Safety in Council owned and managed properties and communal areas.

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1. Purpose

- 1.1. This policy outlines the Council's approach to managing the electrical safety of installations, inspections, repairs, testing and certification of electrical systems in the communal areas, inside domestic properties, streetlights, plant rooms, electrical intake rooms, community facilities, and offices/workspaces and other assets within housing management responsibility.

2. Statement of intent

- 2.1. Keeping residents and building users safe from harm is paramount. We will ensure that all electrical systems and electrical equipment which is within our control is installed, managed, and maintained within current standards set out in legislation and codes of practice, in such a manner as to minimise the risk to any person using such systems to a tolerable level.

3. Scope – The scope/objective of this policy is as follows:

- 3.1. This policy applies to fixed electrical installations and portable appliances that the Council has responsibility for.
- 3.2. All electrical installations in buildings and homes owned by the Council.
- 3.3. Provide technical review of the Council's schemes. The Council operates three letting schemes with **private landlords**, namely **Croylease, Guaranteed Rent Scheme (GRS) and Private Sector Leasing Scheme (PLA)**. These Schemes **are** required to inform landlords during initial negotiations that they need to supply an in date Electrical Installation Condition Report (EICR) with a "Satisfactory" status before the property can be taken on by the council. A copy of the EICR is to be held on file as evidence that the check has been carried out. The properties are added to the LBC asset list to ensure subsequent testing and remedials are undertaken for the duration of the contract. LBC will be responsible for ensuring all remedials for the duration of the contract are addressed.
- 3.4. All assets with an electrical supply will be included in the inspection programme which includes inspection of condition, repair, and maintenance to ensure installations and equipment falling under our responsibility are safe.
- 3.5. Typical installations and systems covered include domestic and landlord installations as set out below:
 - All electrical installations including domestic and communal testing
 - Lightning conductors
 - Portable electrical appliances (where appropriate)
 - Integrated/Fixed appliances (where applicable)
 - Fixed fire, smoke and heat detection and/or carbon monoxide alarms
 - Door entry systems
 - Electric heating systems.
 - Solar Photovoltaic (PV)

- Automatic Opening Vents (AOVs)
- Misting and sprinkler systems
- Electrical vehicle charging points

3.6. The policy applies to Council employees, contractors, tenants and other persons or other stakeholders who may work on, occupy, visit, or use its premises or be affected by its activities or services.

3.7. Primary Responsibility for the Management of Electrical Testing

- Electrical Lifts Manager
- Mechanical Components, Water Manager
- Electrical Inspector
- Electrical Administrator

4. Legal framework and standards

4.1. The following legislation and standards apply to this procedure.

Legislation:

- The Health and Safety at Work Act 1974
- The Building Regulations 2010 – Electrical Safety – Dwellings (Approved document P)
- The Electricity at Work Regulations 1989
- The Electrical Equipment (Safety) Regulations 1994
- The Landlord and Tenant Act 1985
- The Management of Health and Safety at Work Regulations 1999
- The Fire Safety Reform Order 2005
- The Building Safety Act 2022

Code of Practice:

- IET Wiring Regulations British Standard 7671: 2018 (18th edition)
- The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE) 2012 (4th edition)
- HSE INDG236: 'Maintaining portable electrical equipment in low-risk environments' (as amended 2013)
- Electrical Safety Council: 'Landlords' Guide to Electrical Safety 2009'.
- Code of Practice for the Management of Electrotechnical Care in Social Housing (January 2019)
- BS EN/IEC 62305 Lightning Protection Standard

5. Related documents

- Repairs Policy
- Voids Management Policy
- Asset Planning and Capital Delivery Programme Plan
- Fire and Building Safety Policy

6. New installations

- 6.1. All new fixed electrical installations will comply with the current edition of British Standard 7671: 2018 (18th edition amendment 2) and Approved Document P: Building Regulation in England covering electrical safety in dwellings, 2013 Edition, resulting in the issue of an Electrical Installation Certificate

7. Existing installations

- 7.1. Existing domestic installations will be subject to an inspection by a competent electrical engineer and issued with an Electrical Installation Condition Report (EICR) with no longer than 5 years between issue of certificates. An electrical inspection is also carried out whenever there is a change in tenancy, concerns about installations, change of use, and some planned and major works. In some instances, the electrician may identify defects with the electrical installation. Defects should be classified by the electrician as one of the following and they will detail within the EICR their recommended rectification:
 - **Classification code C1** - Danger present. Risk of injury, or Immediate remedial action is required or isolation. EICR will state that the installation is **Unsatisfactory unless the appropriate remediation is carried out.**
 - **Classification code C2** - Potentially dangerous. Urgent remedial action is required. EICR will state the installation to be **Unsatisfactory unless the appropriate remediation is carried out.**
 - **Classification code C3** - Improvement required. EICR will state the installation to be **Satisfactory** if no other C1's or C2's have been identified.
- 7.2. All C1's should be remedied at the point of testing. Any C2's should be remedied as soon as possible and ideally at the point of testing.

8. Scope

- 8.1. Electrical repairs are reported to the Customer Contact Centre. An approved electrical contractor undertakes the scheduled repairs within the allocated response time.
 - Emergency (e.g. trapped in a Lift as a result of an electrical fault) – 45 minutes
 - Emergency repairs - within 2 hours
 - Non-urgent repairs - arrange an appointment at a day and time that suits the tenant.
 - Semi planned repairs – 60 working days
- 8.2. A valid NICEIC (or equivalent) paper or electronic certificate will be completed following any works or alterations that modify the electrical installation in a

property. This certificate to be sent to the Electrical Administrator for filing with other documents related to the property.

- 8.3. Where a tenant has caused damage to electrical installations, we will rectify and recharge the tenant for works carried out, as per their tenancy agreement.

9. Planned Maintenance

The Council will do the following:

- 9.1. Have a programme of visual inspections of all communal electrical installations completed, with the results being used to formulate the life cycle of each installation and to programme the replacement date via the capital budget.
- 9.2. Before any electrical work is undertaken as part of a planned programme (eg kitchen replacements) that impacts, alters or modifies electrical installations, the project management team must ensure that electrical certificates relating to previous repairs to the installations are referred to.
- 9.3. Carry out periodic electrical inspection and testing on domestic electrical installations at least every 5 years as standard.
- 9.4. Comply with IET guidance requirements to keep records of all checks, inspections, and tests for the life of an installation.

10. New tenancy

- 10.1. All electrical installations should be inspected and tested before the commencement of any new tenancies. A satisfactory Electrical Installation Condition Report (EICR) will be issued to the tenant before they move into the property when they sign their tenancy agreement in compliance with legal requirements.

11. Mutual exchange

- 11.1. Before a mutual exchange can be completed it must be established that there is a valid electrical certificate for each property. If there is no valid certificate for the property, checks must be completed before the exchange goes ahead. It is the outgoing resident's responsibility to ensure that there is a valid certificate, they must allow access to a contractor to carry out the check. In any case a new certificate must be issued regardless of whether there is still a valid certificate.
- 11.2. Any appliances which have been installed by the previous resident must be removed before re-letting. No electrical appliances should be left in situ.

12. Portable Appliance Testing (PAT)

- 12.1. All portable electrical equipment owned/managed by the Council and placed to provide services or located in communal areas will be subject to an annual portable appliance test (PAT).
- 12.2. The Council will take reasonable steps to ensure that all appliances (e.g., cookers, heater etc.) provided as part of the tenancy agreement are safe.
- 12.3. Appropriate labelling of equipment and recording of all equipment will be undertaken in accordance with the Electrical Equipment (Safety) Regulations 1994, the Code of Practice for In-service Inspection and Testing of Electrical Equipment.
- 12.4. A register of electrical equipment that has been tested must be kept to demonstrate the actions taken. This register is currently held by the Council's Compliance Team.

13. Integrated/Fixed Appliances Testing (FAT)

- 13.1. Fixed appliance testing refers to any electrical appliance fitted to the mains directly, via a fused spur unit. Examples include Towel rails, Hand driers in toilets, Water boilers in kitchens, Appliances that are integrated so the plug is not accessible.
- 13.2. It is essential that fixed appliance and equipment testing is carried out by a competent person, in accordance with the specific tests for particular classes of equipment.

14. Powered gates, barriers & pedestrian doors

- 14.1. We will inspect and maintain powered gates, barriers, and pedestrian doors in accordance with statutory requirements and consider the manufacturer's requirements. Frequencies and activities will be specific to the equipment but generally, the following will apply
- 14.2. Powered gates and barriers will be inspected and maintained 6 monthly.
- 14.3. Powered doors will be inspected and maintained annually.
- 14.4. A competent person will undertake a periodic risk assessment of all powered gates, barriers, and pedestrian doors. Risk assessments will be reviewed by the recommendation of the competent person undertaking the assessment.
- 14.5. The register of powered gates are held by the Compliance Team

15. Lightning protection systems

- 15.1. We will inspect and test lightning protection systems in accordance with the current edition of BS EN 62305:3 on an annual basis taking into account ground conditions at different times of the year.
- 15.2. The register of lightning protection systems is held by the Compliance Team

16. Competence

- 16.1. We will engage with contractors who hold a current certificate to demonstrate they can cover the range of work being carried out, and which is issued by a certification body accredited by UKAS to ISO/IEC 17065, or an equivalent (an example of this would be registered with the NICEIC, NAPIT or ECA Registered Member).
- 16.2. We will ensure that all staff undertaking key roles within the delivery and management of this area will have access to training and support applicable to their roles.

17. Record keeping

- 17.1. We will maintain accurate and up-to-date records of all completed EICRs, Minor Electrical Works Certificates (MEW), smoke/heat detector works, installation of emergency lighting and Building Regulation Part P notifications associated with remedial works from these reports and Electrical Installation Certificates and keep these as per the organisation's Data Retention Procedure.

18. Quality assurance

- 18.1. The Council will appoint a third-party independent auditor to undertake quality assurance audits on a minimum 5% sample of electrical works and supporting documentation. This may be increased if there is a concern about the quality of works
- 18.2. An independent audit of electrical safety will be carried out at least once every two years. This audit will specifically test for compliance with the regulation, legislation, and codes of practice and identify any non-compliance issues for correction.

19. Performance reporting

- 19.1. Key performance indicators will be established and maintained to ensure there is appropriate monitoring in relation to electrical safety.

20. Responsibilities are held as follows:

20.1. **The Director of Housing – Assets and Repairs is responsible for the following:**

- 20.1.1. Strategic responsibility for the management of electrical safety and ensuring compliance is achieved and maintained.
- 20.1.2. Appoint a Responsible Person/Persons to oversee the implementation of this policy in relation to the properties which they are responsible for.

- 20.1.3. Ensure that resources are made available to allow the actions and measures detailed in this Policy and any associated procedures to be effectively delivered.

20.2. Head of Compliance

- 20.2.1. Reporting on compliance performance to the Director of Housing – Assets and Repairs, Compliance Steering Group, and the Chief Executive
- 20.2.2. Ensure that any compliance and/or health and safety related issues are brought to the attention of the Director of Housing Assets & Repairs.

20.3. Electrical, Lifts and Water Manager

- 20.3.1. Responsible for the day-to-day operational delivery of all electrical testing.
- 20.3.2. Manage the performance of the service delivery contractors, including their ongoing competence, and proactively monitor service delivery against targets.
- 20.3.3. Monitor the quality of work undertaken by the contractor and ensure all certification is received and verified.
- 20.3.4. Act as the organisation's technical lead for electrical safety, ensuring that the Council continue to work in line with the most up-to-date regulations and industry guidance.

20.4. Responsive Repairs

- 20.4.1. Implements the policy in respect of domestic premises and tenanted premises, reporting progress and meeting any target KPIs agreed upon.

20.5. Asset Planning and Capital Delivery

- 20.5.1. Works closely with the Building Safety and Compliance teams to seek assurances that obligations under industry guidance and the procedure measures are being adhered to and services are delivered in line with budget.

20.6. Contractors and subcontractors

- 20.6.1. All appointed electrical contractors must be registered with the NICEIC (or equivalent) and shall be registered under a recognised Domestic Installer self-certification scheme in compliance with Schedule 3 of the Building Regulations 2010.
- 20.6.2. Contractors undertaking electrical work will work by the Health and Safety at Work Act 1974, the Electricity at Work Regulations 1989

and all other current relevant legislation and approved codes of Practice.

20.7. Tenants

20.7.1. It is the tenant's responsibility to allow the Council to undertake these fixed installation inspections and testing, and in doing so they should be made aware that it is necessary to temporarily de-energise the electrical supply to the property.

20.7.2. The Council is not responsible for the safety of residents' cookers, or fixed or portable electrical appliances not provided by the Council or installations which have been installed without our prior approval.

21. Appeals and Complaints

21.1. Should there be a complaint from a tenant concerning, any aspect of electrical safety, this will be dealt with via the Council's Corporate Complaints Policy.

22. Reasonable adjustments

22.1 Croydon Council will make reasonable adjustments to support our residents' needs when they access our services. The term 'reasonable' refers to what we can do without compromising our resources, efficiency, or ability to practically fulfil requests. This does not include [Aids and Adaptations](#) to our properties and common parts of a building.

22.2 No resident should be at a disadvantage when accessing our services. The following statements offer a general overview to ensure that our services are adjusted to meet the needs of our residents where possible. This list is not exhaustive, and we will adapt our approach based on individual resident needs.

22.3 We aim to provide services that are accessible to all who require them. As a result of this, we will:

- Ensure our officers get to know our residents and their individual needs
- Provide a range of ways for residents to contact our officers including phone, mail, email and via [Housing Online](#)
- Provide alternative communication methods on request, such as Braille, foreign language interpreter, large print etc.
- Ensure residents are always able to select their preferred method of contact.
- Ensure our offices are fully accessible to visitors

22.4 We will continue to diversify our services to meet residents' needs where possible.

23. GDPR and Data Protection Act 2018

Housing Management recognise the commitment to ensure that all data is:

- Processed lawfully, fairly and in a transparent manner.
- Collected for a specific and legitimate purpose and not used for anything other than this stated purpose, or as provided for in our privacy and fair processing notices.
- Relevant and limited to whatever the requirements are for which the data is processed.
- Accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay.
- Stored for as long as required, as specified within Housing Management's Records Retention Policy.
- Secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction, or damage.

Further information about the Council's commitment to the General Data Protection Regulations (GDPR) can be found on the Council's website)

24. Glossary of terms

24.1. Electrical installation

An electrical installation is made up of all the fixed electrical equipment that is supplied through the electricity meter. It includes the cables that are usually hidden in the fabric of the building (walls and ceilings), accessories (sockets, switches, and light fittings), and the consumer unit (fuse box) that contains all the fuses or circuit breakers.

24.2. Periodic Electrical Inspection

An inspection of the condition of an existing electrical installation, to identify any deficiencies against the current national standard for electrical installations.

24.3. Electrical Installation Condition Report (EICR)

A formal document produced following a periodic electrical inspection which evidences the condition of the electrical installation. It is a safety certificate issued to confirm that a new electrical installation or addition is safe to use at the time it was put into service.

24.4. National Inspection Council Electrical Installation Contractors (NICEIC)

A voluntary body that regulates the training and works of electrical contractors and organisations across the UK. [Our privacy policy \(niceic.com\)](https://www.niceic.com/our-privacy-policy)

24.5. **The Institution of Engineering and Technology (IET)**

A multidisciplinary professional engineering institution, formed in 2006 from two separate institutions: the Institution of Electrical Engineers (IEE) and the Institution of Incorporated Engineers (IIE). The IET represents the engineering profession in matters of public concern and assists governments to make the public aware of engineering and technological issues [IET - Institution of Engineering and Technology \(theiet.org\)](http://theiet.org)

24.6. **Portable Appliance Testing (PAT)**

This is the process of checking electrical appliances for safety through a series of visual inspections and electronic tests.

24.7. **Integrated/Fixed appliances Testing (FAT)**

Fixed appliance testing refers to any electrical appliance fitted to the mains directly, via a fused spur unit. Appliances that are integrated so the plug is not accessible.

24.8. **Lightning Protection Systems (LPS)**

A system of external earthing and internal surge protection designed to prevent lightning strike damage to buildings.

25. Stakeholders' consultation

25.1. Staff with responsibility and operational knowledge of electrical repairs and maintenance will be consulted during the development of the policy. The consultation will be carried out through the different management levels before seeking approval from the H&S Board.

25.2. The Council's Legal team has reviewed the policy.

25.3. Residents have engaged and been consulted in the development and review of this policy.

26. Monitoring and review

26.1. This policy will be reviewed annually, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Council-wide policies.

26.2. Arrangement for a full internal audit of the electrical safety service and maintenance process to be undertaken by the Council's Internal Auditors. The full scope of the audit will be agreed upon with the Internal Auditors, the Compliance Manager, Electrical engineers, and the Directors of Housing Estates and Improvement

27. Document Control

27.1. This is a controlled document and should not be changed unless by authorisation of the policy owner.

Monitoring		
Approved Date:	19 November 2024	
Next Review Date:	1 November 2024	
Effective date:	20 November 2024	
Consultation Review		
Stakeholders review:	31.10.2024	
Legal review date:	11.11.2024	
Residents reading group:	11.11.2024	
Policy owner:	Director of Assets & Repairs	
Ratified by:		
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.	
Version Control		
Version Number	Summary of change	Author and Approver
1.0	New Policy drafted	Developed and reviewed with subject matter experts in Housing and Residents Reading Group