



Bristol City Council Housing and Landlord Services

Electrical Safety Policy

Version 1

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1. Policy statement

This policy exists to ensure compliance with all relevant legislation and regulations and to describe how Bristol City Council (BCC) will test, inspect, maintain and install its electrical wiring, equipment and appliances present within its Housing Revenue Account (HRA) stock. Bristol City Council (BCC) recognises and acknowledges its statutory regulations and its duty of care to take precautions to protect the safety, so far as is reasonably practicable, of its tenants' homes and communal areas within blocks of flats, and anyone else potentially affected by its undertaking, including leaseholders, against electrical risks.

Failure to maintain electrical compliance responsibilities could result in death or injury, destruction or damage to property and the exposure of Bristol City Council (BCC) to prosecution and fines and its employees to prosecution and imprisonment. Most importantly the aim of the policy is to protect life and property, in accordance with legislation.

Demonstrating our commitment to regulation and legislation, all electrical safety checks and servicing to BCC residential properties will be carried out by prior appointment with the tenant, and every effort will be made to agree a mutually convenient appointment with the tenant.

2. Scope

This policy refers to all communal and domestic electrical work, electric heating, and appliances that BCC Housing and Landlord services (H&LS) are responsible for installing, servicing, repairing and maintaining.

This policy excludes properties leased to Housing Associations or Registered Providers and Commercial units, where BCC is not responsible for repairing or maintaining electrical work as agreed in the lease arrangement. It also excludes RTB leaseholders, except where they are served by communal electrics.

This policy sets out our approach to electrical safety, servicing, repair, maintenance, and installation within Housing & Landlord Services only, with reference to our legal and regulatory obligations in the Landlord and Tenant Act 1985; the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016.

3. Aims and objectives

BCC Housing and Landlord Services recognises its duty to comply with Landlord and Tenant Act 1985; the Electricity at Work Regulations 1989, The Health and Safety at Work Act 1974 and Electrical Equipment (Safety) Regulations 2016. It is our objective to ensure that employees understand their duty to contribute to the robust management of electrical safety and this includes:

- Accurately completing and appropriately storing Landlord electrical safety certificates
- Completing electrical servicing and repairs in line with manufacturers specifications
- Protecting the safety of tenants and residents and members of the public as well as staff, particularly those that work with electrics in and around our blocks and homes.

- Ensuring BCC work to the guidelines put forward in The Electricity at Work Regulations 1989 and Building Regulations.¹
- Protecting BCC's reputation as a landlord

4. Roles and responsibilities and authority

The Director of Housing and Landlord Services has the overall responsibility for electrical safety although delegated authority has been given to the Building Services and Compliance Manager, Mechanical, Electrical & Heating Manager & Electrical Trade Manager reporting to the Head of Housing Repairs and Maintenance.

The Head of Housing Repairs and maintenance is responsible for the overall implementation and review of this policy.

All staff involved in electrical installation, servicing, repair & maintenance activities, under Housing Repairs and Maintenance have responsibility for delivering this policy. The table in [Appendix B](#) details the roles hierarchy for the implementation of this policy and associated procedure.

Managers and supervisors are responsible for ensuring knowledge and understanding within their teams, to discharge BCC duties and responsibilities and to provide positive leadership and visible commitment to this policy and associated procedures.

All residents are to be made aware of their responsibilities and duties concerning electrical safety.

Competent Persons:

In line with **Part P of Building Regulations**, all landlords involved in engaging in electrical work must ensure those employed to carry out these works hold current qualifications and are a member of a competent person's scheme.^{2 3}

5. The policy

5.1 New Installation (domestic)

We will complete rewiring when necessary and aim to complete this when other works are being completed such as the kitchen programme.

We expect our rewires to have a lifecycle of approximately 40-yrs.

All electrical installation work is to be carried out to manufactures specifications / instructions and the current version of BS 7671.

We will keep a record of the Electrical Installation Condition Report (EICR), Electrical Installation Certificate (EIC) and Building Regulations compliance Certificates.

5.2 Existing Installations

¹ [The Electricity at Work Regulations 1989 - HSR25 \(hse.gov.uk\)](#)

² [The Electrical Safety Standards in the Private Rented Sector \(England\) Regulations 2020 \(legislation.gov.uk\)](#)

³ [Electrical safety: Approved Document P](#)

5.2.1 Servicing

BCC will complete an inspection and testing programme at regular intervals based on BS7671 wiring regulations on all tenanted homes. BCC currently works on a ten-year testing programme and is committed to move towards a five-year programme in accordance with best practice.

The Electrical Engineer(s) will take all reasonable steps to achieve access and complete an electrical safety check; however, in cases where access to the property cannot be obtained or is refused by the occupier, BCC will pursue legal action as necessary to fulfil its legal obligation as a landlord.

We will give the tenant two planned opportunities to allow access. There will be three attempts of access before an injunction is sought through our litigation process to gain entry to undertake the required works.

Where the tenant has allowed access but there are obstructions or no clear access to the electrics; for example, where a property is hoarded; the electrical engineer will raise their concerns to the appropriate Housing Officer for assistance, to ensure the test is completed within a 6-months from its test due date.

5.2.2 Electrical Faults

Where during inspection and testing an immediate danger is observed that puts the safety of those using the installation at risk, Classification Code C1 (danger present) must be given.

Any observed damage, deterioration, defects, dangerous conditions, and non-compliances with the requirements of the current edition of BS 7671 that may give rise to danger are recorded (in accordance with Regulation 653.2) and appropriately classified using classification codes for remedial action.⁴

The Electrical Engineer will raise an Electrical Fault as:

- C1- Immediate Risk, action must be made safe on the same day.
- C2-Potential Risk, BCC will aim to complete required remedials within 28 days. EICR will remain unsatisfactory.
- C3- Recommendation of improvements but no timescale.
- FI – Further Investigation Required - BCC will aim to complete further investigation within 28 days. EICR will remain unsatisfactory.

The Electrical Engineer is awarded delegated authority to carry out remedial work for cases of C1 and C2, to a maximum of £250 or in accordance with the individual contract specification.

For works that exceed £250, permission needs to be sought from BCC before it can be completed. In cases of C1, the contractor will inform BCC and works will be agreed and carried out on the day.

5.2.3 Limitations of Testing

BCC will complete a visual inspection which would include:

- 100% inspection of the external condition of the electrical installation on display.
- 100% internal inspections of all consumer units. Including SPD's, RCBO's, AFDD's and MCB's.

⁴ [bpg4-1.pdf \(electricalsafetyfirst.org.uk\)](#)

- 100% internal inspection of the main switchgear.
- 100% inspection of the main earth and protective bonding.
- 20% internal inspection of all accessories and enclosure in the installation.

BCC will complete testing which would include:

- 100% testing of final circuits, tests to include all the following:
 - Continuity of circuit protective conductors
 - Ring circuit continuity.
 - Polarity of radial circuit
 - Polarity at all accessible socket outlets.
 - Insulation resistance between live conductors and earth.
 - Earth fault loop impedance testing of all circuits and at all accessible socket outlets using moulded plug.
 - Trip test of all RCDs/AFDD's in the circuit.
- 100% testing of:
 - Polarity at all consumer units
 - Earth fault loop impedance at all consumer units.
 - Earth electrode resistance if applicable
 - Operation of test button on all RCDs/AFDD's
 - CPC continuity at accessible exposed conductive parts of current using Earth continuity on e.g., Class 1 equipment (See paragraph below)

Samples selected must ensure that they are representative of the installation and the percentage shall be recorded into the 'Extent of the electrical installation covered' section in the EICR.

It is up to the inspector to make better judgment whether the installation is a satisfactory condition during sampling. However, if the samples prove unsatisfactory then further sample checks/tests are to be carried out. If these further checks prove unsatisfactory, then BCC should be notified to arrange for further investigation. The observations sections of the EICR must show what the further investigation and testing is required with a brief description as to why this is required.

5.2.4 Unsafe Situations

In the case of emergency damage to the Distribution supply equipment the Engineer will Call 105. Phone lines are open 24 hours a day, 365 days a year.

BCC will work to the HSE Electrical Safety Guidance and The Meter Operation Code of Practice Agreement (MOCOPA).

5.3 Voids and Relets

BCC will complete an electrical safety check to all properties when they become void to ensure that the vacating tenants have not compromised the electrical system. A Pre and Post Electrical Safety check will be carried out, Pre and Post test will be completed in digital format, to ensure that there is a safe working environment for the voids team and that following the void work the home is safe for the incoming tenant to move in.

Any equipment or appliances installed by former tenants will be removed.

BCC will use the void opportunity to replace or upgrade the electrical heating system if due for planned replacement. EICR documentation will be made available for the residents once tenancy begins.

5.4 Fire Alarm Standard and Testing

BCC aims for its fire alarms within all properties to be a minimum of D1, LD2 standard or LD1 for sheltered housing schemes. BCC has an active programme in place where all voids will be upgraded to the relevant standard and where significant electrical works are required; the delineation line being where works require a circuit to be installed back to the consumer unit or greater. . Alarms design will be to BS5839-6

Routine testing will be required to be carried out by the resident as per BS5839:6. This will require a monthly test and it is recommended that each detectors test button is activated. If alarm does not activate it should be reported to BCC immediately to arrange for a replacement. In the event of a void, routine testing may not be possible.

BCC will attend any property where a faulty heat or smoke alarm is reported and will replace.

BCC will inspect, test and replace if required any detectors to ensure that all detectors are compliant. In accordance with our Smoke, Heat and Carbon Monoxide Detection Policy.

5.5 Mutual Exchange

BCC will complete an Electrical Installation Condition Report pre and post exchange to ensure that the electrical installation is safe for the incoming tenant(s). The pre-test will be carried out in advance of the resident moving and a post electrical test to be completed within days of being reoccupied.

BCC will attempt to complete Post Electrical test on the day or within a minimum of 5 working days post exchange, if access is not granted, this will be escalated to the litigations team to gain an injunction.

5.6 Communal Heating Systems / Boiler Rooms/ Meter Rooms

BCC is responsible for scheduling the service maintenance and compliance of EICRs in communal rooms within high- and low-rise flats.

BCC employees and the registered contractors regularly access these areas, any issues identified outside of the service will be reported and dealt with immediately to ensure the health, safety and wellbeing of the public, tenants, leaseholders and staff in these areas.

5.7 Laundries

BCC is responsible for the maintenance and repairs of communal laundry equipment, including washing machines, tumble driers, spin driers. Utilities serving the equipment include both gas and electric.

BCC will use its internal workforce to provide planned electrical maintenance and servicing to our laundries and equipment with a minimum annual maintenance visit. If the equipment states earlier electrical checks or has been identified internally as a high usage laundry, then BCC will complete bi-annual servicing or comply with manufactures instructions. BCC will also complete repairs and part replacements where required.

5.8 Tenant owned appliances

BCC accepts no responsibility for the installation repair and maintenance of tenant owned electrical appliances.

5.9 Responsive and Emergency Repairs

BCC will respond to requests for electrical related repairs in line with our response repairs procedures. Repairs may be chargeable.

Tenants are expected to first review the repairs that they are responsible for.

If the repair is not the responsibility of the tenant, the tenant must report the repair via the repair form.

If the repair is an emergency, tenants should report the electrical issues that pose a health and safety risk, or an electrical hazard or to the Emergency Repairs team on 0117 922 2200. If required, BCC will then send out an electrical engineer to repair and remediate.

5.10 Risk Assessment

BCC electrical trades staff will be provided with risk assessments sent to their tablets prior to commencing any work and will carry out a dynamic risk assessment before commencing any works.

BCC will risk assess any planned works within our homes, blocks or communal areas that may affect the integrity of the electrical installations. To ensure continued electrical safety and minimise risks of exposure, explosion, injury, or death, whilst maintaining access to electrics.

Managers and supervisors will advise and sign off on risk assessments of the work activities within their service area to ensure that due regard is had to factors caused or influenced by electrical services. Where risks are identified, managers will ensure suitable control measures are in place to reduce the risk to staff together with monitoring and reviewing the effectiveness of those control measures.

Contractors will as part of their pre-construction planning to provide BCC with a full suite of risk assessments relating to the works. BCC will review and store all contractor risk assessments and upon completion allow contractors to proceed with works.

5.11 Training and Personal Development

BCC will ensure all staff and new starters have the necessary skills and qualifications to be competent in their roles and provide opportunity for personal development and training. BCC provides awareness training related to electrical safety via the learning hub as part of the BCC induction programme and a refresher is required at least bi-annually.

BCC will participate in the provision of suitable and appropriate ongoing information, instruction, training, and supervision for identified staff at risk of harm from electrical services to enable them to carry out their duties safely.

Managers and Staff will attend all relevant health and safety training as required.

BCC will keep records of all operatives and their qualifications to ensure compliance. Operatives' respective Line Managers will ensure training and qualifications are kept up to date and any changes to be reported to the Principal Duty Holder.

BCC will encourage our staff involved with electrics to maintain Continuing Professional development (CPD) standards with NICEIC.

All people involved with engaging electrical work must ensure those employed to carry out these works have current electrical qualification's and are a member of approved bodies or CPS Schemes.

BCC will keep records of all external contractors and their qualifications to ensure compliance, and these will be reviewed annually.

5.12 Record Keeping

BCC retains all records of the EICRs for a minimum of 15 years from the date of the certificate to ensure hard copies can be produced when required.

The Electrical Servicing Contractor saves all electrical safety records including certificates electronically.

BCC and the Electrical Servicing Contractor keep accurate records of all their efforts to obtain access to carry out the 5-year electrical safety check and all non-accesses and the dates and times that they were passed to BCC. This will include records/copies of all letters, appointment cards, telephone calls etc.

All new tenants will be provided the EICR at tenancy sign up.

Communal electrical certification will be made available to the resident upon request via [Council block certificates \(bristol.gov.uk\)](https://www.bristol.gov.uk/council-block-certificates).

5.13 Independent External Audit

Every 5 years or as required BCC will work with an independent auditor who will assist in monitoring BCC procedures and working standards.

5.14 Quality Control Procedure

Only skilled persons as defined by British Standards 7671 2018(Requirements for Electrical Installations) including all current amendments will be authorised to carry out Inspection and Testing.

All contractors procured to undertake electrical testing must be an accredited provider as per our procurement practices.

All internal operatives completing electrical installation or inspection and testing will be electrically skilled and possess suitable qualifications to enable them to perceive risks and avoid hazards.

All operatives will hold a Gold Electrotechnical Certification Scheme (ECS) card.

Operatives will be provided with accredited training on all new editions of BS7671 and will complete CPD training on amendments to existing regulations.

All operatives are provided with Asbestos awareness training.

Domestic and Communal Electrical Works

Contract monitoring – BCC's contract administrator will hold monthly contractor meetings to ensure compliance with the contract specifications and KPI's and address any issues that arise.

- 100% of Documentation to be checked and stored digitally. 100% of electrical certification will be checked through a system such as TCW. A sample of these will be manually checked.
- 10% Visual Post/Live inspections – Certificate to be completed and stored for 5 years and digital copy saved. Checks to inspect operatives working conditions and practises as well as ensuring safe electrical safety practices are also being adhered to.
- Jobs to be audited randomly selected by technical officers to ensure both DLO and contractors work are inspected.
- Live inspections to be carried out on all operatives quarterly BCC electrical line managers.
- Operatives and work to be selected at random to ensure a fair and consistent approach.

6. Vulnerability

Where BCC is aware that a person to whom this policy applies is vulnerable, it will consider that person's vulnerabilities when applying this policy. This may include, but is not limited to, considering whether additional advice and assistance needs to be provided, liaising with agencies involved with the care and/or support of that person (where known) and referring that person to agencies and/or BCC departments who may be able to support or assist that person.

This may be particularly relevant to issues around access to the property or condition of the home, preventing work being completed. A collaborative and sensitive approach will be taken to address the concerns preventing the completion of any required work. BCC will also ensure that vulnerabilities are considered and extra steps to engage with the tenant are taken to prevent vulnerable tenants having dangerous electrical systems.

7. Monitoring, review and evaluation

The Building Services and Compliance Manager will ensure that electrical performance is monitored closely, with quarterly performance monitoring information being provided to the Housing & Landlord Services Team (HSLT) and Senior Leadership teams via the service performance and risk management system.

Quarterly reporting is also completed on Pentana reporting system which ensures notification of our compliance to the Regulator for Social Housing.

This policy will be reviewed every two years or in line with legislative or regulatory changes.

8. Equality and diversity

BCC will ensure that this policy is applied fairly and consistently to all our residents. BCC will not directly or indirectly discriminate against any person or group of people.

BCC will act sensitively towards the diverse needs of individuals and communities, and BCC will take positive action to reduce discrimination and harassment.

An Equalities Impact Assessment has been carried out and agreed by the Equalities Team.

Appendices

Appendix A Legal and Policy Context

External

- [The Electricity at Work Regulations 1989 - HSR25 \(hse.gov.uk\)](#)
- [Electrical Safety Best Practice Guides 1 – 10](#)
- [Electrical safety: Approved Document P](#)
- [Electrical safety HSE Guidance](#)
- [The Code of Practice for the Management of Electrotechnical Care in Social Housing.](#)
- [Health and Safety at Work Act 1974](#)
- [The Management of Health and Safety at work 1999](#)
- [Construction \(Design & Management\) Regulations 2015](#)
- [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 \(RIDDOR\)](#)
- [The Dangerous Substances and Explosive Atmospheres Regulations 2002](#)
- [Building Regulations – Approved Documents](#)
- [The Defective Premises Act 1972](#)
- [The Landlord and Tenant Act 1985](#)
- [The Housing Act 1988](#)
- [Equality Act 2010](#)
- [Human Rights Act 1998](#)
- [Housing Act 1996\(IT's\)](#)

Internal

- Health and safety compliance policy
- Permissions and alterations policy
- Response repairs policy
- Laundry Specification
- Mobile Phones & PDAs when driving
- Asbestos Arrangement

Appendix B Hierarchy of roles

Head of Housing Repairs and Maintenance

Reporting to: Director Homes and Landlord Services

Responsibilities: Has ultimate accountability for Electrical compliance across BCC and is the responsible person.

Building Services and Compliance Service Manager

Reporting to: Head of Housing Repairs and Maintenance

Responsibilities: Responsible person for oversight and reporting of Electrical compliance. Ensure overall compliance of electrical safety is met for social housing stock for Bristol City Council.

Mechanics, Electricity and Heating Manager

Reporting to: Building Services and Compliance Manager

Responsibilities: Responsible person for M&E electrical contracts relating to electrical safety. Ensuring compliance is met within the M&E team feeding into the wider structure. Ensuring M&E team have the relevant qualifications and training to remain compliant.

Programme Engineer

Reporting to: Mechanics, Electricity and Heating Manager

Responsibilities: Team supervisor, manage programme of works (M&E side of business)

Project Engineer (Electrical compliance M&E team)

Reporting to: Programme Engineer

Responsibilities: Electrical compliance including servicing compliance and schedule (High- and low-rise blocks). Cross over with domestic team on other domestic issues within blocks. Responsible for day-to-day management of electrical contractors from within the M&E programmes of work.

Responsive Repairs

Electrical Trade Manager

Reporting to: Building Services & Compliance Manager

Responsibilities: Responsible person for managing internal electrical team covering planned services and breakdowns of installations on single dwelling properties.

Electrical Trade Supervisors

Reporting to: Electrical Trade Manager

Responsibilities: Responsible for Line Management of Operatives and QS responsibilities.

Quality Control Engineer

Reporting to: Electrical Trade Manager

Responsibilities: Quality Assurance of internal and external contractor.

Voids Trade Managers

Reporting to: Voids Service Manager

Responsibilities: Responsible persons for electrical trained individuals working within Voids.

General

Business Development

Reporting to: N/A

Responsibilities: Oversight of delivery and performance reporting.

Housing Management and Estates

Reporting to: N/A

Responsibilities: Support delivery of programmes e.g., gain access to hard to access properties.

Glossary of terms

- **The Electricity at Work Regulations 1989:** Regulations that all electrical workers must comply with.
- **Electrical Installation Condition Report (EICR):** Periodic inspection report on a property's safety relating to its fixed wiring.
- **Building Safety (BS 7671):** Building Safety Guidance based on Electricity at Work Regulations 1989. BS 7671 (IET Wiring Regulations) sets the standards for electrical installation in the UK. The IET co-publishes BS 7671 with the British Standards Institution (BSI) and is the authority on electrical installation.
- **National Inspection Council for Electrical Installation (NICEIC):** NICEIC is one of several organisations which regulates the training and work of electrical enterprises in the UK. NICEIC is one of several providers given Government approval to offer Competent Person Schemes to oversee electrical work within the electrical industry.
- **Re-charge:** Costs of work will be passed back to the tenant or leaseholder.
- **M&E:** Mechanical, Electrical and Heating Team.
- **Void:** A period where the property is not tenanted or occupied.
- **CPD:** Continuous Professional Development.
- **Dangerous Substances and Explosive Atmospheres Regulations (DSEAR):** Practical regulatory advice requiring employers to control the risks to safety from fire, explosions and substances corrosive to metals