

Electrical Inspection and Testing Policy



Name	Electrical Inspection and Testing Policy
Owner	Director of Asset Management &
	Development
Last Review	January 2025
Next Review	January 2027
Consultation Board	N/a
Consultation SMT	N/a
Consultation Residents (if applicable)	N/a
Equality Impact Assessment	N/a
Confidentiality	Low
Board Approval	2 nd March 2020

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Approved by: ARC	Date Approved: 05 February 2025	Review Date: February 2028

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1.0 Introduction

- 1.1 BDHT are passionate about providing accessible, safe and secure housing for communities across Bromsgrove and the surrounding area. BDHT serve their communities and residents as a not-for-profit organisation and so every penny gets put straight back in to improving housing and local facilities.
- 1.2 BDHT is regulated by the Regulator of Social Housing (RSH). The Senior Management Team (SMT) and Board set and oversee corporate strategy, including the approval of all compliance policy principles.
- 1.3 Although the UK has a fairly good record of electrical safety, there are still over 30 deaths and nearly 4,000 injuries from electrical accidents that occur in the home each year. A large number are related to electrical maintenance or DIY activities. The major dangers to health from electrical accidents are from shock, burns, electrical explosion or arcing, fire, and mechanical movements initiated by electricity.
- 1.4 BDHT is responsible for the maintenance and repairs to its homes and other buildings, all of which will contain electrical installations and appliances. The Landlord and Tenant Act 1985 and the Housing Act 2004 place duties on landlords to ensure that these electrical installations are safe at the start of any tenancy and are maintained in a safe condition throughout the tenancy.
- 1.5 BDHT is also responsible for maintaining electrical installations and equipment in nondomestic (communal blocks) and 'other' properties (offices, commercial shops, depots, etc.).

2.0 Scope

- 2.1 BDHT must establish a policy which meets the requirements for electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. In addition to this the policy must provide assurance to BDHT that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with electrical installations and electrical portable appliances.
- 2.2 BDHT must ensure compliance with electrical safety legislation is formally reported at Senior Management Team (SMT) and Board level, including the details of any noncompliance and planned corrective actions.
- 2.3 The policy is relevant to all BDHT employees, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.

3.0 Regulatory Standards, Legislation, and Codes of Practice

- 3.1 **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 introduced by Regulator of Social Housing (RSH), formerly the Homes & Communities Agency (HCA), in April 2012.
- 3.2 **Legislation** - the principle legislation applicable to this policy is the Landlord and Tenant Act 1985; the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. Section 8 of the Landlord and Tenant Act 1985 sets out implied terms

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as to fitness for human habitation and Section 11 of the Landlord and Tenant Act 1985 places repairing obligations in short leases. The Electricity at Work Regulations 1989 places duties on employers to ensure that all electrical equipment used within the workplace is safe to use. The Electrical Equipment (Safety) Regulations 2016 requires

Landlords to ensure that any appliances provided as part of a tenancy are safe when first supplied. BDHT is the 'Landlord' by virtue of the fact that they own and manage homes and buildings housing customers/leaseholders through the tenancy, lease and licence agreement obligations it has with the customers/leaseholders.

3.3 Code of Practice - the principle approved codes of practice applicable to this policy are:

3.3.1 IET Wiring Regulations British Standard 7671: 2018 (18th edition)

3.3.2 The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE) 2020 (5th edition)

3.3.3 HSE INDG236: 'Maintaining portable electrical equipment in low risk environments' (as amended 2013)

3.3.4 Electrical Safety Council: 'Landlords' Guide to Electrical Safety 2009'.

3.3.5 Code of Practice for the Management of Electrotechnical Care in Social Housing (January 2019)

3.3.6 ESF Best Practice Guide 4 - 7.1

3.3.7 BS 5266 Emergency Lighting

3.4 Sanctions - BDHT acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.

3.5 Customers - BDHT will use the legal remedies available within the terms of the tenancy agreement, lease or license should any tenant refuse access to carry out essential electrical safety checks, maintenance and safety related repair works. This will be achieved by following legal proceedings.

4.0 Additional Legislation

4.1 This Electrical Safety Policy also operates in the context of the following additional legislation:

4.1.1 Health and Safety at Work Act 1974

4.1.2 The Management of Health and Safety at Work Regulations 1999

4.1.3 The Workplace (Health Safety & Welfare) Regulations 1992

4.1.4 Management of Houses in Multiple Occupation (England) Regulations 2006

4.1.5 Regulatory Reform (Fire Safety) Order 2005

4.1.6 The Building Regulations for England and Wales (Part P)

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4.1.7 The Housing Act 2004

4.1.8 The Occupiers' Liability Act 1984

4.1.9 Health and Safety (Safety Signs and Signals) Regulations 1996

4.1.10 Provision and Use of Work Equipment Regulations 1998

4.1.11 Construction, Design and Management Regulations 2015

4.1.12 Data Protection Act 2018

4.1.13 RIDDOR 2013 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

4.1.14 Homes (Fitness for Human Habitation) Act 2018

4.1.15 The Waste Electrical and Electronic Equipment (Amendment) Regulations 2018

4.1.16 The Provision and Use of Work Equipment Regulations 1998

5.0 Obligations

5.1 The Landlord and Tenant Act 1985 places duties on landlords to ensure that electrical installations in rented properties are:

- Safe when a tenancy begins, Section 8 (1a)
- Maintained in a safe condition throughout the tenancy, Section 11 (1b)

5.2 In order to be compliant under these duties electrical installations are required to be periodically inspected and tested. The intervals between inspections are not absolutely set within any regulations, however, best practice guidance from the Electrical Safety Council and from BS7671:2018 states that electrical installations should be tested at intervals of no longer than five years from the previous inspection. Any deviation from these intervals should be at the recommendation of a competent NICEIC qualified (or equivalent) person and should be backed up by sound engineering evidence to support the recommendation.

5.3 All electrical installations should be inspected and tested prior to the commencement of any new tenancies (void properties), mutual exchanges and transfers and a satisfactory Electrical Installation Condition Report (EICR) (or certification of all remedial works provided alongside the unsatisfactory EICR) should be issued to the tenant prior to them moving in.

5.4 The Electricity at Work Regulations 1989 places duties on employers that all electrical installations and appliances within the workplace are safe and that only competent persons work on the electrical installations, systems and equipment (Section 16).

5.5 The Electrical Equipment (Safety) Regulations 2016 requires Landlords to ensure that any electrical appliances provided as part of a tenancy are safe when first supplied.

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6.0 Statement of Intent

- 6.1 BDHT will hold accurate records against each property it owns or manages, identifying when the electrical installation was last inspected and tested.
- 6.2 Inspection and re-inspection dates, along with EICR records will be held within Aareon QL.
- 6.3 BDHT will ensure that all properties (domestic, communal blocks and 'other' properties) have a valid 'in-date' EICR.
- 6.4 For all new build properties and full property re-wires, the first electrical safety inspection will be carried out on a 10-year inspection period, and following this any subsequent checks will then be completed on the rolling 5-year cycle, in accordance with best practice guidance. A safety inspection will be undertaken sooner than the 5 or 10 year period if recommended by the competent person.
- 6.5 BDHT will also deliver a comprehensive programme of testing and inspections to all communal blocks and 'other' properties (offices, commercial shops, depots, HMO's, etc.) on a rolling 5-year cycle. A safety inspection will be undertaken sooner than the 5-year period if recommended by the competent person.
- 6.6 BDHT will ensure that all electrical installations shall be in a satisfactory condition following completion of an electrical installation inspection and test (this may be evidenced through a satisfactory EICR, or certification of all remedial works provided alongside the unsatisfactory EICR).
- 6.7 BDHT will ensure that a full electrical installation inspection retest is undertaken in the case of a change of occupancy (void properties).
- 6.8 BDHT will ensure that prior to the commencement of any new tenancies (void properties), mutual exchanges and transfers that a satisfactory EICR is issued to the tenant prior to them moving in (or certification of all remedial works provided alongside the unsatisfactory EICR).
- 6.9 BDHT will ensure that only suitably competent NICEIC electrical contractors and engineers (or equivalent) undertake electrical works for the organisation.
- 6.10 BDHT will carry out electrical installation inspection and tests and issue new satisfactory EICRs when completing planned component replacement works within domestic properties, if the property does not currently have a certificate within a five year period. In the case of a rewire BDHT will receive an installation certificate and following minor works, a minor works certificate.
- 6.11 BDHT will periodically (and at least annually) undertake a property asset data review to ensure adequate assurance is provided that electrical safety data held against the organisation's property assets is accurate and up to date.
- 6.12 BDHT will test hard wired smoke alarms as part of the annual gas safety check visit (or at void stage). In the event that the hard wired smoke alarm cannot be replaced at the time of the gas safety check due to a fault, a battery operated smoke alarm will be installed as an interim measure. BDHT will ensure that all properties have a hard wired smoke alarm installed.
- 6.13 BDHT will have a robust process in place to gain access should any customer refuse access to carry out essential electrical safety related inspection and remediation works.

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- 6.14 BDHT will ensure that robust processes and controls are in place to manage the completion of follow up works identified during inspection and testing of electrical installations.
- 6.15 BDHT will ensure that robust processes and controls are in place to ensure that all electrical works are properly notified and approved under Part P of the Building Regulations for England and Wales where this is required.
- 6.16 BDHT will establish and maintain a plan of all continuous improvement activity undertaken with regards to electrical safety.

7.0 Compliance Risk Assessment/Inspection Programmes

- 7.1 **Risk assessment** - BDHT will establish and maintain a risk assessment for electrical safety management and operations. This risk assessment will set out the organisations' key electrical safety risks together with appropriate mitigations.
- 7.2 **CDM** - to comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be completed for all void property (at the start of the contract and annually thereafter), component replacement and refurbishment works. This plan will detail any electrical installations that may be affected by the works and detail all necessary electrical work required to make safe and reinstate electrical installations including the requirement for inspection and testing.
- 7.3 BDHT will carry out a programme of electrical installation inspection and testing to all properties within its control.
- 7.4 This inspection and test will be carried out at intervals of no more than 5 years (unless the competent person recommends the next test must be done sooner than this) and will include the issuing of a new satisfactory EICR (or certification of all remedial works provided alongside the unsatisfactory EICR). This inspection and test is driven from the anniversary date of the most recent EICR which may have been carried out following planned component replacement works.
- 7.5 BDHT will ensure they have records of a valid EICR where properties they own are managed by others (managing agents).

8.0 Compliance Follow up Work

- 8.1 BDHT will ensure there is a robust process in place for the management of any follow-up works required following the completion of a periodic inspection and test of an electrical installation.
- 8.2 BDHT will ensure there is a robust process in place to collate and store all EICRs and associated records and certification of completed remedial works.
- 8.3 BDHT will as a minimum make safe and/or where possible endeavour to repair all code 1 and code 2 defects identified by a periodic electrical installation inspection and test before leaving site after completing the inspection and testing works. Any further code 2 remedial works which cannot be completed at the time of the inspection and test will be completed within 30 days and certification of all remedial works provided alongside the unsatisfactory EICR to confirm that the installation is now in a satisfactory condition. Code 3 works will be added onto a programme of works and prioritised based on the associated risks. All further investigations will be completed within 5 days.

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- 8.4 BDHT will establish and implement programmes of electrical installation upgrading works to improve electrical installations that have been identified as not meeting current standards but are in a satisfactory condition for the purposes of an EICR, up to a standard that meets all current requirements of BS7671 (2018) 18th Edition.

9.0 Record Keeping

- 9.1 BDHT will hold accurate records against each property it owns or manages, identifying when the electrical installation was last inspected and tested.
- 9.2 Inspection and re-inspection dates, along with EICR records will be held on Aareon QL.
- 9.3 BDHT will establish and maintain accurate records of all completed EICRs, Minor Electrical Works Certificates (MEW) and Building Regulation Part P notifications associated with remedial works from these reports and Electrical Installation Certificates and keep these for a period of no less than 7 years.
- 9.4 BDHT will hold and maintain accurate records on the qualifications of all engineers undertaking electrical safety works for the organisation.

10.0 Key Roles and Responsibilities

- 10.1 BDHT Board will have overall governance responsibility for ensuring the Electrical Safety Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such the Board will formally approve this policy and review it every two years (or sooner if there is a change in regulation, legislation or approved codes of practice).
- 10.2 The Board will receive regular updates on the implementation of the Electrical Safety Policy and electrical safety performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.
- 10.3 SMT will receive reports in respect of electrical safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 10.4 The Director of Asset Management & Development has strategic responsibility for the management of electrical safety and ensuring compliance is achieved and maintained. The will oversee the implementation of the Electrical Safety Policy.
- 10.5 The Head of Customer Delivery will be responsible for overseeing the delivery of the agreed electrical safety programme, and the prioritisation and implementation of any works arising from the electrical safety inspections.
- 10.6 The housing teams will provide key support in gaining access into properties where access is proving difficult and use standards methods to do so. They will also facilitate the legal process.
- 10.7 The Director of Asset Management & Development will be responsible for ensuring the policy is reviewed every two years, and will notify the Board, SMT and operational team responsible for the delivery of the compliance programme, of the upcoming review. The Director of Asset Management & Development will ensure that this review process takes place before the policy expires in February 2022.

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10.8 The Director of Asset Management & Development will ensure that this policy is saved on the organisations shared drive and distributed to all relevant members of staff.

11.0 Competent Persons

11.1 BDHT will ensure that the manager(s) with lead responsibility for operational delivery is appropriately qualified; holding a recognised electrical safety management qualification. They should have or be working towards gaining the CORGI Level 4 VRQ in Electrical Safety Management. If they do not have this already, they should obtain it within 12 months of the approval of this policy.

11.2 BDHT will ensure that the manager with lead responsibility for operational delivery maintains Approved Electrical Contractor Accreditation with the National Inspection Council for Electrical Inspection Contracting (NICEIC) or equivalent for all areas of electrical inspection, testing, installation and repair works that they undertake.

11.3 BDHT will ensure that only suitably competent NICEIC Approved Electrical contractors (or equivalently accredited) are procured and appointed to undertake electrical inspection, testing, installation and repair works.

11.4 The operational team with responsibility for delivery will check the relevant accreditations for the work that contractor and operatives are carrying out. These checks will be undertaken on an annual basis and evidenced appropriately.

12.0 Training

12.1 This policy and the procedures that support it will be subject to a range of training across BDHT and will involve all relevant stakeholders. The training will be bespoke to the individual stakeholders and refresher training will be provided as appropriate.

12.2 Training will include team briefings for those employees who need to have a basic understanding and awareness of electrical safety but who may not be actively involved in the delivery of the electrical safety policy. This will be basic electrical safety awareness training and covered in team meetings.

12.3 On the job training will be provided to those employees who will be responsible for managing the programme of electrical installation inspections and repair works to electrical installations and portable appliances as part of their daily job.

12.4 Regular tool box talks will be given to operatives in the form of appropriate electrical safety training. BDHT will ask their contractor partners to do this and evidence upon request.

12.5 Monthly briefings will be provided to those employees involved in the monitoring of compliance performance in relation to electrical safety.

13.0 Performance Reporting

13.1 Robust key performance indicator (KPI) measures will be established and maintained to ensure BDHT is able to report on performance in relation to electrical safety.

13.2 KPI measures will be produced and provided at SMT level on a monthly basis and Board level on a quarterly basis. As a minimum, these KPI measures will include reporting on:
Data - the total number of:

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- Properties - split by domestic properties, communal blocks and 'other' properties
- Properties on the electrical inspection and testing programme
- Properties not on the electrical inspection and testing programme
- Properties with a valid 'in date' EICR. This is the level of compliance expressed as a number and a %
- Properties where the EICR has expired and is 'out of date'. This is the level of non-compliance expressed as a number and a %
- Properties which are due to be inspected and tested within the next 30 days. This is the early warning system.

Narrative - an explanation of the:

- Current position
- Corrective action required
- Anticipated impact of corrective action
- Progress with completion of follow-up works

13.3 BDHT will carry out an internal desktop review of 100% of EICRs, with monthly work in progress/post inspections being completed by the electrical compliance manager.

13.4 BDHT will appoint a third party independent auditor to undertake quality assurance audits on a sample of electrical works and supporting documentation.

14.0 Non-Compliance/Escalation Process

14.1 Any non-compliance issue identified at an operational level will be formally reported to the Director of Asset Management & Development in the first instance.

14.2 The Director of Asset Management & Development will agree an appropriate course of corrective action with the Chief Executive in order to address the non-compliance issue and report details of the same to SMT.

14.3 SMT will ensure the Board is made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

14.4 In cases of a serious non-compliance issue SMT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of coregulation as part of the Regulatory Framework.

15.0 Approval

Strategic Lead: Director of Asset Management & Development

Sign/date:

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Chair Board:

Sign/date:

Board Member:

Sign/date:

16.0 Glossary

16.1 This glossary defines the key terms used throughout this electrical safety policy:

16.1.1 **EICR:** Electrical Installation Condition Report - a formal document that is produced following an assessment of the electrical installation within a property (domestic or communal). It must be carried out by an experienced qualified electrician or approved contractor.

16.1.2 **NICEIC:** National Inspection Council for Electrical Installation Contracting - an organisation which regulates the training and work of electrical contractors in the UK. The NICEIC is one of several providers given Government approval to offer Competent Person Schemes to oversee electrical work within the electrical industry.

17.0 Board/EMT Approval was gained

- Approved by Audit and Risk Committee on 05 February 2025.

18.0 Review Date

- This policy will be reviewed in January 2027.

19.0 Equality Policy Statement

19.1 At bdht, we are proud to serve and work within a diverse society. We recognise that some individuals and communities face systemic barriers, disadvantage, and discrimination, including those related to socio-economic background, caring responsibilities, and the impact of intersectionality.

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- 19.2 We believe that discrimination in any form is unacceptable. In all our areas of work we are committed to ensuring that our policies, practices, and services promote fairness, equity, and respect for all. We aim to *reduce inequalities, promote respect, and create an equitable culture within our organisation*.
- 19.3 bdht fully complies with the Equality Act 2010 and all relevant statutory and regulatory guidance, including that issued by the Regulator of Social Housing, Homes England, the Government Equalities Office, and our funding partners.
- 19.4 We believe that equality of opportunity is fundamental to delivering excellent services and building vibrant communities together. Our commitment is underpinned by clear policies, regular monitoring, and continuous review, all of which are actively supported by our Board and Teams.

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