

Electrical Safety Management Policy

Date Effective: May 2021 Date of Review:



1. Purpose

The overall aim of this policy, and the associated procedures and control documents is to ensure the safety from electricity, or fire caused by electrical fault, for people living and working in properties owned, managed or leased by Riverside Scotland (the trading name for Irvine Housing Association) as a subsidiary company of The Riverside Group [TRG].

Riverside Scotland aims to protect the occupiers of its properties, as well as other residents, visitors, staff, contractors and the general public, from the risks associated with electrical hazards so far as is reasonably practicable.

This document sets out key policy objectives, control measures and accountabilities for ensuring electrical safety.

This purpose of this policy is to ensure Riverside Scotland meets its obligations under the following legislation:

- The Health and Safety at Work etc. Act 1974;
- The Management of Health and Safety at Work Regulations 1999;
- The Scottish Housing Quality Standard (SHQS) and the Scottish Government's Repairing Standard.
- The Electricity at Work Regulations 1989 [1]
- Electrical Equipment (Safety) Regulations 1994 [4]
- The Housing (Scotland) Act 2014
- The provision & use of work equipment regulations 1998 (PUWER)
- Environmental Protection Act 1990
- The Consumer Protection Act 1987 (CPA)
- Housing & Planning Act 2016

Other Legislation

- Gas Safety installation & use regulations
- The Building (Scotland) Act 2003
- Building Act 1984
- The Workplace (Health Safety & Welfare) Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- Construction, Design and Management Regulations 2015
- GDPR
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Approved Codes of Practice (ACoP) [HSE]:

- Electrical Installation Regulations BS 7671:2018 (as amended)
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Further Guidance

- Electrical Guidance Note 3
- British Standards relating to Lightning Protection BS 6651:1999, BS EN 62305

The application of this Policy ensures that Riverside Scotland meets compliance with the outcomes of the Scottish Housing Regulator specifically in relation to the 'Healthy, Safe and Secure' elements of the Scottish Housing Quality Standard.

2. Scope

This policy applies to all fixed electrical installations and fixed or portable equipment including installed in any areas within all properties owned or managed by Riverside Scotland. Riverside Scotland does not hold a duty of care to leaseholders, owner occupiers or shared owners in respect of domestic electrical installations.

Any electrical equipment installed by Riverside Scotland for use by an employee at work or by a tenant is covered by the policy as follows:

- Fixed wired electrical installation
- Portable appliances
- Integrated Warden Call
- Domestic social alarms
- Door Entry Systems (domestic)
- Door Entry Systems (commercial)
- Communal Digital Aerials
- Specialist electrical equipment i.e. lightning conductors

This policy does not include the following

 Fire safety electrical equipment i.e. fire alarm, AOV, emergency lighting which is covered by the Associations Fire Safety Management Policy.

3. Key Legal Requirements

UK regulations have an explicit duty on owners of buildings with electrical installations or with electrical equipment is installed, Riverside Scotland are expected to take reasonably practicable measures to ensure that the premises, including means of access or egress and equipment provided for use, are safe and without risk to health. Riverside Scotland will:

- 1. Identify all fixed electrical installations and metered installations
- 2. Identify all electrical equipment and identify and assess the nature and level of risks.
- 3. Manage these risks to reduce them as far as reasonably practicable.
- 4. Take action to reduce the risks which are proportionate
- 5. Provide information, instructions and training to the people who use the equipment.
- 6. Introduce an effective In Service Inspection and Testing of all installations and equipment and maintenance program.

4. Key policy objectives

Riverside Scotland will:

- 1. Implement as appropriate TRG's "Electrical Safety Management Plan" across the stock profile.
- 2. Appoint persons with clear roles and responsibilities to manage the risk associated with electrical installations and equipment.

- 3. Assess our stock profile against qualifying building criteria to identify presence of "electrical equipment" within our assets.
- 4. Ensure that In Service Inspection and Testing of all installations and equipment is undertaken at suitable intervals in accordance with EWR and PUWER, servicing and maintenance contracts in place and undertake the necessary work to correct any C1\C2 deficiencies found.
- 5. Develop and maintain a register [the Register] listing all properties with electrical installations that Riverside Scotland are responsible for whether owned, leased or managed and date of the last EICR.
- 6. Prioritise & complete corrective actions identified within defined timeframes and promptly repair or renew any defective part of an electrical installation
- 7. Ensure any unauthorised and defective alterations or additions to electrical installations are rectified or removed on discovery.
- **8.** Only appoint electrical contractors registered with the NICEIC, ECA, NAPIT or other accredited body and who are registered under a recognised Domestic Installer Self-certification Scheme in compliance with The Scottish Building Standards Standard 4.5 electrical safety for all buildings and standard 4.6 electrical fixtures for domestic buildings only.
- **9.** Ensure that detailed records are kept and administered.
- Ensure that contracts with external contractors are managed effectively and robust contract monitoring is in place to monitor performance and promote continuous improvement.
- 11. Implement appropriate training for all staff responsible for administering the controls

5. Policy implementation

The accountabilities for implementation of this policy are as set out below:

- 4. Riverside Scotland's Managing Director retains overall accountability for the implementation of this policy.
- Riverside Scotland's Head of Service Delivery, in direct liaison with the TRG's Executive Director of Asset Services, is responsible for overall policy implementation, ensuring adequate resources are made available to enable the objectives of the policy to be met
- Riverside Scotlands Head of Service Delivery in direct liaison with TRGs Director of Building Safety and relevant Head of Performance and Compliance is responsible for the delivery of the key policy objectives as set out herein including designing and implementing procedures, staff training and communication to customers.
- 7. Riverside Scotland's Asset Services Manager in direct liaison with TRGs Senior Compliance Manager is responsible for the implementation and monitoring of the operational effectiveness of the Policy, operational management plan and

procedures and ensuring all appointed organisations and individuals have the appropriate levels of skills, knowledge, education and training.

- 8. Riverside Scotland's Asset Services Manager in direct liaison with TRGs Compliance Manager (M&E) is responsible for ensuring all risk assessments are undertaken, risk reduction activity is undertaken and all M&E safety equipment is regularly inspected and tested and remain in use. Management of contractors and ensuring all work is carried out safely and maintaining and updating our compliance register.
- 9. Neighbourhood Services and front line staff shall support asset management and contactors in gaining access to carry out electrical testing and work.
- 10. Riverside Scotland's Head of Service Delivery in direct liaison with TRGs in direct liaison with TRG's Head of Health, Safety and Environment is responsible for ensuring the policy is kept up to date with prevailing legislation and statutory obligations.
- 11. This policy shall be implemented through a set of process maps, protocols, procedures and control documents. All staff are responsible for following the requirements of those documents.

Mechanical Equipment Management Plan

Riverside Scotland will seek to implement as appropriate TRG's Electrical safety Management Plan [ESMP] and carry out training with staff and contractors to ensure its requirements are understood.

The management plan sets out the mechanism by which mechanical equipment and installations are managed.

5. Electrical Inspection Condition Reports [EICRs]

Riverside Scotland has carried out an assessment of risk as recommended by Guidance Note 3 to IEE Wiring Regulations BS7671 and duly decided on the following intervals of testing:

In line with recommendations, dwellings are to be tested and a satisfactory EICR produced as follows:

- 1. Every five years.
- 2. During major upgrade works where electrical installations are affected. E.g. kitchen replacement
- 3. After any significant work is carried out to the electrical installation
- 4. At every change of occupancy (exceptions may apply for short-term lets in certain properties criteria will be included in the Electrical Safety Management Plan)
- 5. At the time of any mutual exchange

And:

6. all communal areas of Blocks (Landlord's supply), commercial premises and offices, every 5 years

All EICRs shall be held in electronic format, centrally stored, logged to the Register and linked to the relevant property record by Asset ID/UPRN. Only certificates denoted "satisfactory" are admissible.

6. Monitoring and Quality Control

Riverside Scotland will monitor implementation of this policy using a set of performance measures as below:

Measure	Target	Interval	Reviewed by
No. of Blocks with satisfactory EICR	100% By 30/03/18	Monthly	Head of Service Delivery/ Compliance & Health &
No. of dwellings with satisfactory EICR (Sheltered)	100% By 31/03/2018		Safety Manager in direct liaison with TRG's Executive Directors/Head of Performance &
No. of dwellings with satisfactory EICR (General Needs)	100% By 31/03/2021		Compliance via Compliance Dashboard.
EICR completed to programme	100%		Head of Service Delivery in direct liaison with TRG's Head of Performance & Compliance

Policy implementation will be reviewed:

- Quarterly by the TRG's Performance and Compliance Team, in conjunction with the Compliance and Health and Safety Manager, reported to the TRG's Asset Management SMT.
- 2. Annually by a suitable qualified and accredited 3rd party and a report provided to the Riverside Scotland's Managing Director and Riverside Scotland Board or delegated sub-committee and TRG's Executive Director of Asset Services.
- **3.** By the TRG internal audit team, as required, and a report provided to the Group Audit Committee.

9 Electrical equipment checks

Electrical equipment may also need to be inspected at suitable intervals between EICR examinations, this is to ensure the equipment continues to operate as intended, and risks associated with wear or deterioration are avoided. This is usually where your risk assessment has identified a significant risk from the use of the equipment. If they are required:

- inspections should be regular (e.g. every 6-12 months)
- the scope and frequency will be determined by the competent person; or the manufacturers of electrical equipment and detailed within the operational management plan.

The periods for each system type will be described within the operational management plan. These are the maximum periods between each examination

unless there is an examination scheme produced by a competent person in place, which can specify longer or shorter periods depending on the risk of defects arising.

Riverside Scotland will employ competent contractors to inspect and maintain all equipment and will also:

- Ensure that such inspections include an assessment of risk to customers, employees and visitors to the property
- Ensure that such inspections are carried out within the month of anniversary date. This date will change only where there has been a change of equipment or through a planned renewal of the electrical equipment

EICR Programme

Riverside Scotland recognises that it is not currently meeting its policy objectives for domestic electrical installations in respect of timescales for routine electrical testing [EICRs] and has implemented an EICR programme, to recover the back-log, as follows:

Property\tenancy type	Programme start	Programme completion (=Target Date for meeting policy objective)
Domestic – General Needs Rented	01/04/18	31/03/2022

Monitoring and Quality Control

The TRG's Business Intelligence Team produce reports in relation to the agreed Key Performance Indicators (KPI's).

A risk-based Compliance control framework and monitoring programme has been developed to confirm set objectives are met. A suite of Key Performance/Management / Operational indicators have been developed along with a reporting framework to inform Senior Management, Board and staff on performance and progress made towards meeting set objectives.

Measure	Target	Min. Reporting Interval	Reviewed by
% of known risks which have been assessed	100%		
% risks which have been reviewed in accordance with level of risk and appropriate timescales	100%	Monthly	Executive Directors\Head of Property Compliance /Safety First via Compliance Dashboard.
% risks with outstanding actions/control measures by risk level	0%		

Volume of overdue risk by risk classification	0		

This approach will support the identification of weaknesses, gaps in performance and provide assurance on compliance.

Policy implementation will be reviewed:

- 1. Quarterly by the Compliance Team, reported to the Asset Management SMT.
- 2. Annually by a suitable qualified and accredited 3rd party and a report provided to the Executive Director of Asset Services

By the TRG internal audit team, as required, and a report provided to the Group Audit Committee.

8. Guidance & standards

Measures taken to comply with this policy shall meet as far as possible the requirements of the following technical standards:

18th Edition of the Institution of Engineering and Technology Wiring Regulations (BS 7671:2018), which came into effect on 1st January 2019. All domestic wiring installations must be designed, constructed, inspected, tested and certificated to meet the requirements of BS 7671: 2018. Although these standards are not applicable to all works covered by this policy we will endeavour to apply them when undertaking any electrical upgrade or repair work.

Electrical Installation Certificates shall be suitably completed and in full compliance with BS 7671:2018, IET Guidance Note 1 – and all current amendments.

Testing frequencies are derived from table 3.2 of guidance note 3 Inspection and Testing by the Institute of Engineering Technology.