



PRIMA
GROUP

**Electrical Safety &
Testing Policy**

Contents

Electrical Safety and Testing Policy3
1 Aims of the Policy3
2 Policy Statement / Scope3
3 Regulatory Standards.....4
4 Additional Regulations.....4
5 Resident Involvement and Engagement.....5
6 Risk Assessment / Inspection Programmes5
7 Follow up/ Remedial Work.....5
8 Record Keeping.....5
9 Key Roles and Responsibilities.....6
10 Competent Persons.....6
11 training.....6
12 Procurement and Performance Management7
13 Quality Assurance.....9
14 Approach to Difficult Access9
15 Non-compliance / Escalation10
16 Compliance Remedial Works11
17 Electrical Safety Information.....11
18 Electrical Process Safety Map.....12
11 Document Control Data12

Electrical Safety and Testing Policy

1 Aims of the Policy

Prima is responsible for the maintenance and repairs to its homes and other buildings, most of which will have electrical supplies, appliances and equipment.

The electrical safety and testing policy details how Prima Group 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.

The regulations also place a legal duty on landlords to ensure that electrical supplies, installations, appliances and fittings provided for tenants' use are safe, so far as is reasonably possible.

In addition to this, the policy provides assurance 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.

The policy is relevant to all Prima Group employees, tenants, contractors and other persons 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 Prima Group to maintain a safe environment for tenants and employees within the home of each tenant and within all non-domestic (communal) premises or areas of buildings.

The key objective of this policy is to ensure that Prima's Board, employees, partners and tenants are clear on the legal and regulatory obligations in respect of electrical installation, maintenance, servicing and repair, and how they will be met.

The policy meets the requirements of the key legislation and codes of practice set out in BS7671 (2018) Requirements for Electrical Installations IET Wiring Regulations 18th edition including all amendments and other relevant legislation relating to electrical safety. It also recognises the best practice recommendations of NICEIC (National Inspection Council for Electrical Installation Contracting). In addition to this, the policy provides assurance that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with electrical supplies, installations, remedial works and appliances.

The policy relates to all Prima residential stock with an electric supply.

2 Policy Statement / Scope

Prima Group acknowledges and accepts its responsibilities with regard to 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.

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

- Safe when a tenancy begins;
- Maintained in a safe condition throughout the tenancy;

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.

The key objectives of the policy are to establish:

- Electrical safety management principles
- Approach to compliance remedial work
- Record keeping
- Competent persons
- Training
- Audit procedure
- Non-compliance
- Electrical Safety Information

3 Regulatory Standards

The primary legislations covering Electrical safety are:

The Electricity at Work Regulations 1989

Electrical Equipment (Safety) Regulations 1994

4 Additional Regulations

Additional Legislations that should also be considered under this policy are:

- Management of Health and Safety at Work Regulations 1999
- Health and Safety at Work Act 1974 etc
- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Building Regulations in England and Wales
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Construction (Design and Management) Regulations 2015
- Landlord and Tenant Act 1985
- Data Protection Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Homes (Fitness for Human Habitation) Act 2018

5 Resident Involvement and Engagement

All customer facing policies are reviewed by Prima's Customer Voice Board before being approved by Common Board.

Prima Group considers good communication essential in the delivery of Electrical Safety and will establish and maintain resident engagement and a programme to support tenants in their understanding of Electrical Safety.

All information and literature relating to Electrical Safety will be displayed on the Prima website and articles will be included in the resident's newsletters and annual reports.

6 Risk Assessment / Inspection Programmes

Prima Group will establish and maintain a risk assessment for Electrical safety management and operations. This risk assessment will set out key electrical safety risks together with appropriate mitigations.

7 Follow up/ Remedial Work

Prima Group will ensure that there is a robust process in place to identify and complete any follow up or remedial works in line with the current repairing timescales and processes.

8 Record Keeping

Prima Group will establish and maintain an asset register of all properties with an electric supply, we will also hold data against each property of electrical inspection, testing and servicing requirements, where applicable, for all domestic properties, communal blocks, offices and 'other' property assets.

Prima Group will operate a robust process to deal with all changes to stock, including new property acquisitions, new developments, disposals and stock transfers, in order to ensure that properties are not omitted from the compliance programme, and to ensure the programme and records remain up to date.

Prima Group will electronically hold and maintain accurate records of all completed Electrical Installation Condition Reports (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 not less than 10 years for all property we own or manage.

Prima Group will ensure that all NICEIC registered engineer reports include the details of all appliances and other equipment which is served by the electrical supply in every

domestic property, communal block or 'other' property.

Prima Group will electronically hold and maintain accurate records of all completed electrical Portable Appliance Test reports and details of associated completed remedial works and keep these for a period of not less than 5 years

Prima Group will establish and maintain accurate records of all completed safety records, warning notices and associated remedial works and keep these for a period of not less than two years.

9 Key Roles and Responsibilities.

Prima Group Board is ultimately responsible for the delivery of the Electrical Safety and Testing Policy and will gain assurance through quarterly performance reports that will clearly show compliance status and detail any instances of non-compliance on a unit basis.

Prima Group Board delegates responsibility for the strategic delivery of the Electrical Safety and Testing Policy to the Executive Management Team and the operational delivery of the policy and its annual review is the responsibility of the Group Director of Housing and Growth.

The Asset Manager is responsible for the delivery of the day to day electrical inspection, maintenance and testing programme, and they must be suitably qualified to carry out these duties. The housing management team will assist in the initial instances of no access cases

10 Competent Persons

Prima Group will ensure that the manager(s) with lead responsibility for operational delivery is appropriately experienced and qualified holding a recognised Safety and Management qualification.

Prima Group will ensure that only suitably competent NICEIC Approved Electrical Contractors are procured and appointed to undertake electrical inspection, testing, installation and repair works. The operational team with responsibility for delivery will check the relevant accreditations for the work that they are carrying out. These checks will be undertaken on an annual basis.

Prima Group will ensure that only suitably competent engineers are employed or appointed to undertake electrical portable appliance testing (PAT). The operational team with responsibility for delivery will check the relevant qualifications of persons undertaking PAT testing to ensure that they are certified as competent to carry out PAT testing. These checks will be undertaken on an annual basis.

11 training

The Manager(s) with lead responsibility for operational delivery should be appropriately experienced and qualified holding a recognised Safety and Management qualification.

Role specific 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 duties.

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 include electrical safety awareness training.

Regular toolbox talks (quarterly) will be given to operatives in the form of appropriate electrical safety training. Prima's partner contractors will be expected to do this with their operatives and evidence this to Prima on request.

Prima's health and safety officer will at regular intervals attend the contractor's toolbox talks.

12 Procurement and Performance Management

Prima Group will procure external contractors to deliver electrical safety checks, electrical related repairs and installations. The award of the contract to deliver these services will be based on a thorough assessment of cost, competence, quality of service and safety.

Strict competency requirements and relevant accreditations will be maintained by the contractor for the duration of the contract.

Prima Group accepts that it is the responsibility of the landlord to maintain effective controls and to ensure all landlord legal obligations are met in relation to electrical safety. These legal obligations cannot be delegated.

Prima Group will hold accurate records against each property it owns or manages identifying when the electrical installation was last inspected and tested.

Prima Group will ensure that all domestic properties owned or managed have a valid Electrical Installation Condition Report (EICR) that does not exceed five years from the date of the previous EICR.

Prima Group will deliver a comprehensive programme of testing and inspection of all domestic properties on a rolling five-year cycle.

Prima Group will ensure that all non-domestic (communal) properties and offices owned or managed have a valid Electrical Installation Condition Report (EICR) that does not exceed five years from the date of the previous EICR.

Prima Group will deliver a comprehensive programme of testing and inspections of all non-domestic (communal) properties and offices on a rolling five-year cycle.

Prima Group will ensure that all electrical installations shall be in a satisfactory condition following completion of an electrical installation inspection and test.

Prima Group will ensure that electrical installation inspections and tests are carried out prior to the commencement of any new tenancies (void properties), mutual exchanges and transfers and that a satisfactory EICR is issued to the tenant prior to occupancy.

Prima Group will ensure that only suitably competent NICEIC registered electrical contractors and engineers undertake electrical works.

Prima Group will ensure that all 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).

Prima Group will either obtain a satisfactory minor works certificate for alterations or carry out electrical installation inspections and tests and issue new satisfactory EICRs when completing planned kitchen component replacement works within domestic properties.

Prima Group will receive an installation certificate for a rewire and a minor works certificate following completion of any minor alteration works.

Prima Group will test and replace as necessary, smoke alarms and heat detectors, as part of the five-yearly electrical inspection and testing visit.

Prima Group 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.

Prima Group 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.

Prima Group will ensure that robust processes and controls are in place to manage works to void and occupied properties that may affect existing electrical installations.

Prima Group will have a robust process in place to gain access to all properties including where tenant vulnerability issues are known or identified whilst ensuring timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.

In delivering any repairs or improvements in our properties, Prima will maintain the safety of our employees, contractors and customers as a priority and this may impact on how we plan and carry out the work. Depending on the circumstances, published

timescales/response times might need to be changed.

Operational KPI performance will be reported to and monitored by Prima Group Executive Management Team.

The risk of 'failure to appropriately manage electrical safety' will be included on the Prima Group Risk Register and kept under regular review.

Board assurance will be provided via Quarterly Asset Compliance reports to Common Board and regular performance reporting to Customer Board.

Electrical Safety Compliance will also be included on the internal audit plan every second year to test compliance with regulation, legislation and approved codes of practice.

13 Quality Assurance

Quality assurance of the contractors' technical performance will be undertaken by an externally appointed specialist consultants.

Prima Group will carry out independent third-party quality assurance audits of electrical installation condition reports and associated repair and installation works.

Best practice suggests this should be a 10% sample of the total electrical safety works carried out.

14 Approach to Difficult Access

The tenancy agreement between landlord and tenant allows for access to a property so that the landlord can undertake 5 yearly electrical fixed wire inspections and other required electrical safety checks.

Prima Group operates a robust process to gain access should any tenant refuse access to carry out essential Electrical Safety related inspection and remediation works.

Prima Group 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.

Prima Group will request access to a property to undertake the 5 yearly fixed wire inspection test no later than 10 weeks prior to the expiry of the current fixed wire inspection report. A minimum of two further written requests to gain access must be issued to the tenant before legal action is considered.

Prima Group will support tenants where vulnerability issues are known or identified and work with relevant partners to assist us in gaining access. However, we must maintain a robust process to gain access to properties where tenant vulnerability issues are known

or identified, ensuring we can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.

In all instances, prior to the expiry of the current fixed wire inspection report, Prima Group Executive Management Team must be satisfied that all reasonable steps have been taken to gain access to the property to complete the necessary fixed wire inspection report.

Failure to take all reasonable steps prior to the expiry of a current fixed wire inspection report will be reported to board.

A documented 'access procedure' and template letters will be produced and approved by the Executive Management Team. These documents will be kept under regular review to ensure best practice is adopted and flexibility is provided to employee in exhausting all legal avenues available to them to gain access to the property.

Tenants who refuse to allow access for electrical safety checks will not only be breaching their tenancy agreement but also causing Prima Group to be in breach of their legal and statutory obligations. By refusing access the tenant will also be putting their own household, along with their neighbours' households, at significant risk of harm.

If there is a failure to allow access for an electrical safety appointment, relevant electrical inspection, maintenance, safety checks Prima Group will have no choice but to seek assistance through the courts, by obtaining an injunction for access. If this action becomes necessary, then Prima Group will be entitled to seek to recover their legal costs from the tenant.

An access injunction order obtained in relation to access to the property will contain a penal notice. This means that if the tenant does not allow access as ordered they will be held in contempt of court and may be sent to prison.

Prima Group can also apply to the court for permission to force entry into a property where access has not been granted. If a tenant repeatedly refuses access for gas safety checks, Prima Group may ask the court to grant a 'lifetime injunction' which would last for the duration of the tenancy.

15 Non-compliance / Escalation

Any non-compliance issue identified at an operational level will be formally reported to the Group Director of Growth in the first instance. The Group Director of Growth will agree an appropriate course of corrective action with the operational team in order to address the non-compliance issue and report details of the same to the Executive Management Team. The Executive Management Team will ensure that the Audit & Assurance Committee and the Common Board are made aware of any non-compliance issue, so they can consider the implications and take action as appropriate.

In cases of a serious non-compliance issue, the Executive Management Team and Board will consider whether it is necessary to disclose the issue to Homes England in the spirit

of co-regulation as part of the Regulatory Framework.

16 Compliance Remedial Works

Prima Group 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.

Prima Group 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 remedial works to code 1 and 2 defects will be completed within ten working days (except where a rewire is required) and an EICR will be issued stating that the installation is in a satisfactory condition.

Prima Group 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.

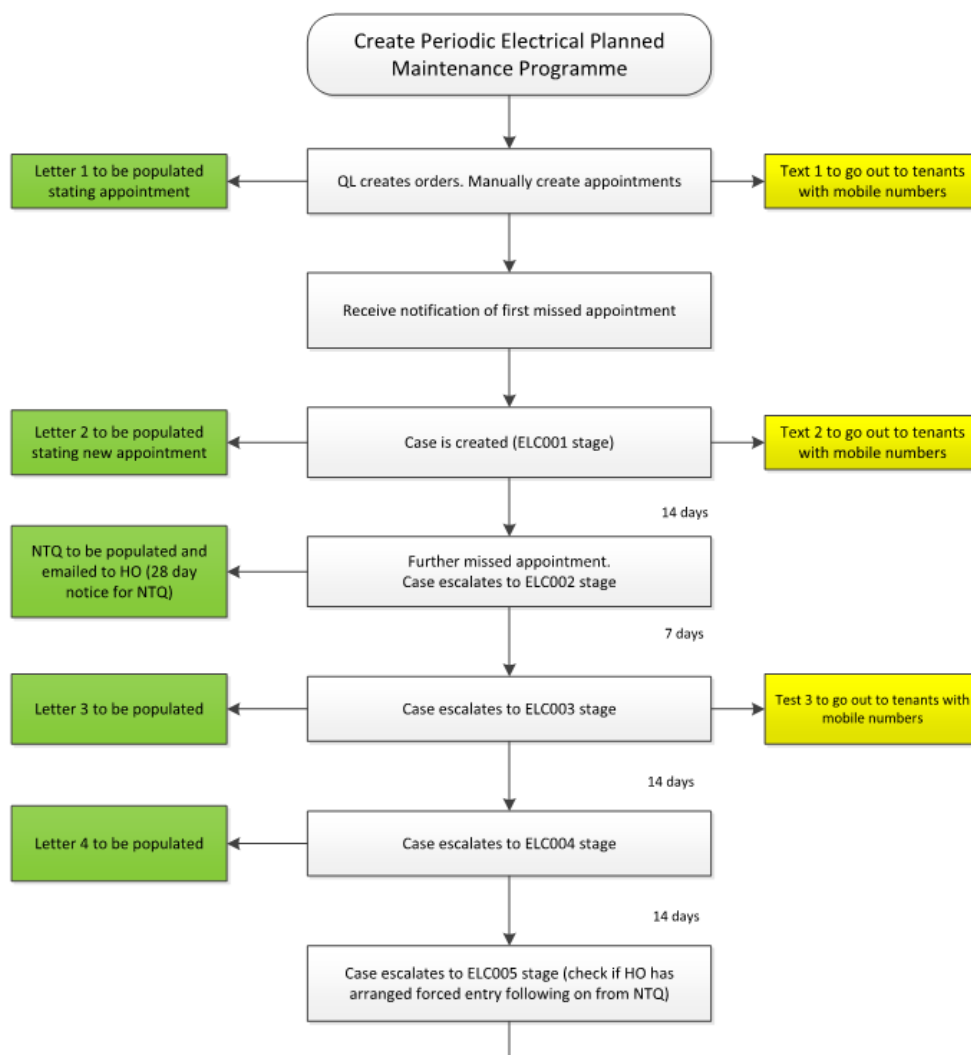
Prima Group will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued with regard to electrical safety.

17 Electrical Safety Information

Prima Group considers good communication essential in the safe delivery of electrical safety management and will therefore ensure that relevant information is provided to residents.

Prima Group will provide advice to customers regarding electrical safety via information on its website.

18 Electrical Process Safety Map



11 Document Control Data

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Name of Reviewer:	Keith Pennant, Health and Safety Officer
Change Log:	<p>Added / amended</p> <p>P3 Prima is responsible for: P3 The regulations place a legal duty on the Landlord. P3 The Key of the policy are: P4 This policy meets the requirements of key legislation: P5, section 3 Regulatory Standards P5, section 4 Additional regulations P5 Resident involvement and engagement P5, section 6 Risk assessment / / inspection programmes P5-6 Follow up / Remedial work P6 Record keeping P6-7 Roles and Responsibilities P7, section 10 Competent Persons P7, section 11 Training P8-10, section 12 Procurement and Performance Management P10, section 13, Quality Assurance P10-11 section 14 Approach to difficult access P11-12, section 15 Non-compliance / Escalation P12 section 16 Compliance remedial works P16, section 17 Electrical safety information</p> <p>Deleted</p> <p>Page numbers from existing policy. P3, Prima will take a systematic approach P4-5, section 3 monitoring and performance P5-6, section 4 Compliance and remedial works P6, section 5 Record keeping P7, section 7 Training P7, section 8 Audit procedure P7, section 9 Non-compliance</p>
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