



**Crawley Homes**  
**Electrical Safety Policy**

|                             |                        |
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| <b>Policy Date:</b>         | <b>5 February 2025</b> |
| <b>Version approved by:</b> |                        |
| <b>TLAP</b>                 | <b>9 January 2025</b>  |
| <b>Cabinet</b>              | <b>5 February 2025</b> |

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## **1. Introduction**

- 1.1. This policy details how Crawley Borough Council ensure the safety of fixed electrical installations, portable appliances (where applicable) and other electrical systems or fixtures in properties owned or managed by Crawley Borough Council.
- 1.2. Installations are to be installed, maintained, and serviced to required standards and inspected at appropriate intervals to minimise the risk of electrocution, fire, damage to property, injury and or death.
- 1.3. Crawley Borough Council will ensure that a specific electrical contract is in place, in accordance with legislation and best practice, which provides adequate provision for suitably qualified and accredited electrical contractors to manage all aspects of the delivery of electrical testing, repairs, upgrades and the provision of new installations.

## **2. Legal Context**

- 2.1. The following legislation and regulations relate to this policy. It is not an exhaustive list, but includes the main regulations to which Crawley Borough Council will adhere:
  - Landlord and Tenant Act 1985
  - Housing Act 2004
  - Management of Health and Safety at Work Regulations 1999. (amendment 2006 TBC)
  - Building Regulations (including Part P requirements)
  - The Health and Safety at Work Act 1974
  - Electricity at Work Regulations 1989
  - Requirements for Electrical Installation IET Wiring Regulations 18th Edition BS7671:2018 (including all amendments)
  - The Electrical Equipment (Safety) Regulations 1994
- 2.2. The additional principal guidance and codes of practice applicable to this policy are:
  - INDG236 - Maintaining portable electrical equipment in low-risk environments (as amended 2013).
  - IET Wiring Regulations British Standard 7671:2018 (18th edition)
  - Code of Practice for the Management of Electrotechnical Care in Social Housing (Electrical Safety Roundtable) January 2019.
  - The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (IET) 2020 (5th edition).

### 3. Definitions

| Term / Acronym   | Description  |
|------------------|--|
| <b>EICR</b>      | 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.  |
| <b>NICEIC</b>    | 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. |
| <b>Customer</b>  | Customers are defined as tenant and residents, living in our homes that are eligible to access and receive services associated with electrical safety.   |
| <b>Complaint</b> | Any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, our own employees, or those acting on our behalf, affecting a customer or group of customers  |

### 4. Electrical Testing and Certification

- 4.1. Periodically inspecting and testing ensures an existing electrical installation is safe to remain in service. The policy identifies damage, deterioration, defects and/or other conditions that effects electrical safety and gives rise to danger.
- 4.2. Crawley Borough Council will complete a full electrical condition report (EICR) test at the following intervals:
- **New Build Assets** - first inspection carried out five years after installation, thereafter every five years.
  - **Rewires** - first inspection carried out five years after installation, thereafter every five years.
  - **All Domestic Accommodation Properties** - inspected every five years or at a change of occupancy or mutual exchange and following any major upgrade works where electrical installations are affected.
  - **Communal Areas or Installations** - inspected every five years or following any major upgrade works where electrical installations are affected.

- 4.3. At the time of inspection all properties will be upgraded to the new standard for smoke, heat, and CO detection (as required) in compliance with current legislation.
- 4.4. Only appropriately skilled and competent persons will carry out electrical inspection and testing. Tenants own alterations must be agreed upon in writing by Crawley Borough Council prior to commencement and must be complimented with a valid EICR undertaken by a NICEIC electrician.
- 4.5. It is the responsibility of those undertaking inspection, testing, installation, and repair to:
- Ensure no danger occurs to any person.
  - Ensure no damage occurs to property.
  - Compare the inspection and testing results with the design criteria.
  - Take a view on the condition of the installation and advise on any remedial works and their relevant priority.
  - In the event of a dangerous situation, make safe and immediately provide a recommendation to the responsible person.
  - Issue appropriate certification, following review by a qualifying supervisor where appropriate and keep necessary records.
- 4.6. On completion of a periodic test, original Inspection certificates or digital equivalents pdfs of certification will be issued to Crawley Borough Council and to the tenant. This certificate will make recommendations for additional remedial works required which will be reviewed by the Mechanical and Electrical Surveyor or other competent person and interfaced into the Crawley Homes asset management system.
- 4.7. Remedial Electrical works identified on certification will be recorded using the following categories:
- **Code C1:** Where a real and immediate danger is observed that puts the safety of those using the installation at risk. The contractor will make safe immediately prior to leaving site and advise Crawley Borough Council of the urgent work necessary to remedy the deficiency.
  - **Code C2:** An observed deficiency not considered to be dangerous at the time of inspection but would become a real and immediate danger if a fault or other foreseeable event was to occur.
  - **Code FI (Further Investigation):** Investigation required without delay.
  - **Code C3:** Used to indicate that, whilst an observed deficiency is not considered to be a source of immediate or potential danger, improvement would contribute to an enhancement of the safety of the electrical installation.

- 4.8. Crawley Borough Council shall, as a minimum, make safe and/or, where possible, endeavour to repair all C1 and C2 defects identified by a periodic electrical installation inspection and test before leaving site after completing the inspection and testing works.
- 4.9. Where it is not possible to rectify C1 defects then the system shall be isolated prior to leaving. Where it is not possible to rectify all C2 or FI defects prior to leaving site, a return visit to the property shall be scheduled in for these works to be completed within 28 days.
- 4.10. Crawley Borough Council will establish and implement programmes of electrical installation upgrading works to improve electrical installations that have been identified as in need of significant remedial works as part of the periodic testing programme.
- 4.11. Crawley Borough Council will periodically review the qualifications of all contractors' employees delivering works to ensure that only appropriately trained and skilled employees are engaged on these works.
- 4.12. All new installations shall be provided with an Electrical Installation Certificate complete with a schedule of inspections and test results. The documents shall be suitably completed and in full compliance with BS 7671, IET Guidance Note 1 – and all current amendments.

## **5. Portable Appliance Testing**

- 5.1. All electrical equipment owned/managed by Crawley Borough Council will be subject to an annual portable appliance test (PAT). Appropriate labelling of equipment and recording of all equipment will be undertaken in accordance with the Electrical Equipment (Safety) Regulations 1994.
- 5.2. The Personal Mobility Aids Policy defines the requirements regarding any requirement for PAT testing of tenant's own mobility scooters.

## **6. Other Fixed Electrical Installations**

- 6.1. Crawley Borough Council will undertake a periodic risk assessment of all lightning protection systems, powered gates, barriers, and pedestrian doors – the frequency of these cyclical assessments will be determined by the current legislation, standards and approved codes of practice, not exceeding more than one year per cycle, and will be conducted by a competent person in accordance with manufacturer's instructions.

- 6.2. Generally, powered gates and barriers will be inspected and maintained six monthly and powered doors and lightning protection equipment will be inspected and maintained annually.
- 6.3. Crawley Borough Council will carry out regular inspections on all automatic smoke vents provided to minimise the build-up of smoke in corridors and stairwells used as a means of exit. Inspection certificates will be recorded in our document management system against the property address to ensure that an electronic copy is available at all times. All recommended defect work will be carried out to maintain the smoke vents/windows to a satisfactory operating standard.
- 6.4. The frequency of inspection and testing of other fixed electrical components will be determined considering:
- The type of installation and adequacy of earthing and bonding.
  - Suitability of the switchgear and control gear.
  - Serviceability of accessories and fittings.
  - Type of systems and their condition.
  - Extent of any wear and tear, damage, or other deterioration of other parts of the installation and level of misuse (e.g., vandalism).
  - Presence of adequate identification and notices.
  - Any change in use of the premises which have led to, or might lead to, deficiencies in the installation.
  - EICR observations and recommendations.
  - The frequency and quality of maintenance.
  - Appropriate legislative requirement

## **7. Contractors Competency**

- 7.1. Any contractor undertaking electrical installation work must be registered through the National Inspection Council for Electrical Installation Contractors (NICEIC) the Electrical Contractors Association (ECA), National Association for Professional Inspectors (NAPIT) or other accredited body and will be required to demonstrate compliance with the competency requirements of the Electrical Equipment (Safety) Regulations 1994
- 7.2. Where 'notifiable' works are required, contractors must be registered with a competent person self-certification scheme, to certify compliance with Part P of the Building Regulations.
- 7.3. Individual engineers working on electrical installations must be trained, competent and hold a relevant and current industry recognised qualification.

## **8. Properties managed by others**

- 8.1. Crawley Borough Council will obtain EICRs where properties are managed by a third party, such as Private Sector Landlords. If the third party does not provide the EICR, Crawley Borough Council will carry out the inspection and obtain the EICR, and re-charge them for the cost of this work.

## **9. Domestic Smoke, Heat and Carbon Dioxide Alarms**

- 9.1. Crawley Borough Council will comply with all current legislation concerning the coverage and placement of alarms within the home and integrated smoke and heat alarms and carbon monoxide detectors will be subject to an inspection regime of at least every five years.
- 9.2. Crawley Borough Council will, at the same time as the undertaking of the EICR, ensure that a check is made of any installed Smoke, Heat and Carbon Monoxide (CO) alarms.
- 9.3. The engineer will replace any existing defective or missing alarms, remedial works will be raised for any faulty or missing hard-wired alarms to be replaced. This will include instances where hard wired smoke, heat and CO alarms are removed as part of planned maintenance or responsive repair works.
- 9.4. Additionally, Crawley Borough Council will inspect domestic integrated smoke and heat alarms and carbon monoxide detectors in the following circumstances and frequency:
  - As part of the annual gas safety inspection – annually
  - Installation of electrical heating systems (including Heat Pumps) – annually from date of installation
- 9.5. Crawley Borough Council maintains a database detailing the date alarms have to be replaced. This will form a cyclical programme of replacement and will be managed internally.

## **10. Emergency Lighting in Common Areas**

- 10.1. Crawley Borough Council will arrange to carry out an emergency lighting test annually 'drain down' for common closes where emergency lighting exists. All repairs will be completed within seven days of notification. Installations with self-testing capabilities will be checked for faults after each test.

- 10.2. Crawley Borough Council will arrange to carry out emergency lighting quarterly 'flick test' will be undertaken to ensure that battery back-up engages.

## **11. Safety Checks and No Access Issues**

- 11.1. For work in homes, access can be an issue, and it is particularly important to ensure the fixed wiring is satisfactory and that smoke alarms where not working or have passed the manufacturers guarantee are replaced.
- 11.2. Crawley Borough Council will attempt to access properties three times by standard letter and telephone call as necessary. Where the tenant does not give access, Crawley Borough Council will send a fourth and final 'warning of injunction' letter advising them of the serious potential risk for continuing to deny access and a third appointment booked.
- 11.3. Where access is refused for a fourth time without correspondence being received by the tenant, a notice will be issued advising them that Crawley Borough Council will aim to gain access enforcing the tenancy agreement, and all associated attendance costs may be recharged to them.
- 11.4. Crawley Borough Council recognises that there may be specific tenancy management reasons why access has been unsuccessful. In these circumstances Crawley Borough Council will try to resolve any issues before opting to force access and recharge tenants.
- 11.5. Crawley Borough Council Electrical Test and Inspection no access procedure is contained within Appendix 1.

## **12. Monitoring and Control**

- 12.1. The Compliance Team will maintain a formal system of contractor monitoring to ensure the electrical safety management system continues to operate in compliance with the agreed scope of works and with documented procedures and that any non-conformances, ineffective arrangements and problem areas are quickly identified and acted upon.
- 12.2. In order to ensure full compliance, monitoring will be undertaken regularly using Crawley Homes core IT system, documenting all assets and their relevant testing timescales. Operational teams will review the register regularly and a summary will be provided to Senior Management Team.

- 12.3. The Compliance Team will report any out of compliance electrical systems to the Senior Management Team quarterly, with commentary on expected rectification dates.
- 12.4. Electrical testing and compliance specific key performance indicators (KPIs) will be agreed annually. Reporting of this information will be the responsibility of the Compliance Team on a monthly basis at Operational Core Group and will be scrutinised by the Senior Management Team as necessary to ensure Crawley Borough Council are monitoring compliance.
- 12.5. All Contractors will abide by the Crawley Borough Council Code of Conduct and Service Standards, Diversity and Equality Policies.

### **13. Quality Assurance**

- 13.1. Crawley Borough Council will undertake monthly auditing of electrical compliance issued by Principal Contractor to ensure safety and value for money. Monthly audits will involve the review of sampled certification submitted by contractors. Any anomalies will result in a wider sample being investigated.
- 13.2. Crawley Borough Council will carry out an independent audit of electrical safety at least once every three years, to specifically test for compliance with all legal and legislative requirements and Crawley Borough Council policies and processes.

### **14. Scope**

- 14.1. This policy applies to all social housing rental accommodation, low-cost home ownership homes (rent-to buy), other intermediate rent homes and non-domestic properties (communal lounges and operational and non-operational buildings).
- 14.2. This policy does not apply to shared ownership, leasehold properties or commercial properties. The only exceptions being where Leasehold agreements determine the council is responsible for the maintenance and repair of some electrical services. Also, where relevant building safety legislation dictates the requirement to ensure building services (including those within a private dwelling) are safe.
- 14.3. This policy is relevant to all our employees, customers, contractors, stakeholders, and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.

- 14.4. The policy should be used by all to ensure they understand the obligations placed upon us to maintain a safe environment for customers and employees, within the home of each customer, and within all communal areas of buildings and other properties we own and/or manage.
- 14.5. The Policy should be read in conjunction with the following Crawley Borough Council policies and procedures:
- Health and Safety Policy
  - Gas Safety Policy
  - EICR Access Procedure
  - Code of Conduct
  - Asbestos Management Policy
  - Tenancy / Lease Agreement
  - Environmental Policy
  - Repairs Policy
  - Data Protection Policy

## **15. Responsibilities**

- 15.1. **The Chief Executive** Retains the overall responsibility for the implementation of this policy.
- 15.2. **The Head of Crawley Homes** is responsible for ensuring that adequate resources are made available to enable the objectives of this policy to be met.
- 15.3. **The Asset Manager** Is responsible for the associated procedures; this includes responsibility for monitoring, review, policy development and ensuring risks associated with electrical installations and safety are managed effectively.
- 15.4. **The Compliance Manager** Is responsible for the operational delivery of and compliance with this policy, staff awareness and training, and communication to customers.
- 15.5. **The Mechanical and Electrical Surveyor** will take the lead on contract management for the main service areas involving electrical testing, repairs and installation.
- 15.6. **Employees/Contractors**, irrespective of their position, shall:
- Take reasonable care for their own health and safety and that of other persons who may be adversely affected by electrical works, including members of the public, tenants, visitors, and contractors.
  - Co-operate as appropriate with other staff and agencies to ensure compliance with this policy and all other legal requirements.

- Halt works that, constitutes a serious risk to health and safety.
  - Report any concerns that they may have in relation to the management of electrical compliance and electrical safety.
- 15.7. Tenants shall, under the terms of their Tenancy Agreement, report any repairs or faults in a timely manner and allow access Crawley Borough Council access to their property for maintenance and/or safety checks to be carried out.

## **16. Complaints or Disputes about the policy**

- 16.1. If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV.](#)

## **17. Equalities Implications**

- 17.1. Crawley Borough Council acknowledges its responsibilities to persons with disabilities in the event of an electrical incident.
- 17.2. Crawley Borough Council will collect and record relevant information to understand the diverse needs of our residents, such as protected characteristics, language barriers, and additional needs, as they affect their personal and the building's safety.

## **18. Consultation**

18.1. All policies are subject to resident consultation. As a minimum this includes each policy being placed before our Tenant and Leaseholder Action Panel (TLAP) for scrutiny, and drawing upon feedback gained through resident engagement activities. Wider consultation will also take place depending upon the nature, complexity or impact of a policy.

18.2. Details of consultation can be found in the Equality Impact Assessment relating to the policy and in consultation summary documents where consultation has been more wide-ranging.

18.3. All policies must also have agreement of SMT and Cabinet.

## **19. Staff Training and Review**

- 19.1. Staff dealing with the management of electrical safety will have training appropriate to their needs and to the needs of Crawley Borough Council

identified within their Personal Training Plans to ensure the safety of its tenants in properties where there are electrical installations and appliances.

19.2. This will include all relevant legislation as well as training on all internal procedures and record keeping.

19.3. This policy will be reviewed after the first year, and every two years thereafter.

### **Appendix 1 – Electrical Safety No Access procedure**

There is no documented legal route allowing access to domestic tenanted social housing properties to undertake essential electrical inspection and testing safety checks. This is despite the regulated need to ensure the electrical installations within these properties remain safe.

Crawley Borough Council use the Electrical Safety roundtable approach making four documented access attempts, ensuring the tenant is given:

- Adequate notice
- Information about why it is important to allow access
- A clear explanation of what will happen if access is not permitted. On all 4 occasions

Failure to allow access after 4 attempts/ 4 letters should result in the case being passed back to Crawley Borough Council legal department to progress through one of the routes identified below.

The following legislation provides justification for access where needed.

- **Landlord and Tenant Act 1985**

Requires the electrical installation in a rented property is: “Safe when the tenancy Begins and maintained in a safe condition throughout the tenancy,” and is kept “in Repair and proper working order.”

- **Housing Act 2004**

Requires the property to be fit for human habitation.

- **Regulatory Reform Fire Safety Order 2005 England and Wales**

Requires the landlord to apply appropriate measures to manage the risk of fire, containment and escape routes within nondomestic buildings and Houses of Multiple Occupation.