

Electrical Safety Policy

Document Owner	Operations Director
Prepared by	Operations Director
Approved by	Customer Services Committee of the Board
Approved date	February 2025
Date of next review	February 2027
Monitoring, Auditing and Reporting	<ol style="list-style-type: none"> 1. Regular reporting to Directors Group and Board 2. Internal audit programme 3. Policy review and approval by Board at least every 2 years

1. Scope and Aims

- 1.1. As a landlord, Hexagon Housing Association (Hexagon) is responsible for repairs and maintenance to our homes, communal blocks and other properties we own and manage, all of which will contain electrical installations, equipment and portable appliances.
- 1.2. The key objective of this policy is to ensure our Board, Directors Group, employees, partners and residents are clear on our legal and regulatory electrical safety obligations. This policy provides the framework our staff and partners will operate within to meet these obligations.
- 1.3. This policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be distributed to all relevant members of staff.
- 1.4. This policy is relevant to all our employees, residents, 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.
- 1.5. The policy should be used by all to ensure they understand the obligations placed upon Hexagon to maintain a safe environment for residents and employees, within the home of each resident, and within all communal areas of buildings and other properties we own and/or manage. Adherence to this policy is mandatory.

2. Roles and Responsibilities

- 2.1. The Board has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation and regulatory standards. As such, the Board will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).
- 2.2. For assurance that this policy is operating effectively in practice, the Board will receive regular updates on its implementation, electrical safety performance and non-compliance.
- 2.3. The Directors Group (DG) will receive monthly performance reports in respect of electrical safety and ensure compliance is being achieved. They will also be notified of any non-compliance issues identified.
- 2.4. The Director of Operations has strategic responsibility for the management of electrical safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.

- 2.5. The Head of Property Safety has operational responsibility for the management of electrical safety and will be responsible for overseeing the delivery of these programmes and will also fulfil the role of Responsible Person on behalf of Hexagon.
- 2.6. The Electrical & M&E Project Manager has operational responsibility for the management of electrical safety and will be responsible for overseeing the delivery of these programmes.
- 2.7. Housing teams will provide support where gaining access to properties is difficult and will assist and facilitate any legal processes, as necessary.

3. Obligations

- 3.1. The Housing Act 2004 requires that properties are free from Category 1 HHSRS hazards; this includes electrical hazards.
- 3.2. The Landlord and Tenant Act 1985 and the Homes (Fitness for Human Habitation) Act 2018 place duties on landlords to ensure that electrical installations in rented properties are:
 - 3.2.1. Safe when a tenancy begins.
 - 3.2.2. Maintained in a safe condition throughout the tenancy so the property is fit for habitation.
- 3.3. To comply with these duties, electrical installations are required to be periodically inspected and tested. There is no legal requirement setting out how frequently we must carry out inspections and tests in domestic properties, however the government is consulting on introducing mandatory checks on electrical installations for social housing at least every five years and / or change of tenancy.
- 3.4. Best practice guidance from the Electrical Safety Council and from BS7671:2018 recommends that electrical installations are tested at intervals of no longer than five years from the previous inspection. This guidance also states that any deviation from a five-year interval should be at the recommendation of a competent NICEIC qualified (or equivalent) person and should be backed up by sound evidence to support the recommendation.
- 3.5. All electrical installations should be inspected and tested prior to the commencement of any new tenancies. This means that tests should be carried out whilst properties are void and when mutual exchanges and transfers take place, and a satisfactory Electrical Installation Condition Report (EICR) must be issued to the resident upon moving in.

- 3.6. 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.
- 3.7. 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.

4. Policy Statement

- 4.1. Hexagon acknowledge and accept our responsibilities with regards to electrical safety under the legislation and regulations.
- 4.2. Hexagon will ensure that all electrical installations are in a satisfactory condition following the completion of an electrical installation inspection and test and will require the production of a condition report or other certificate which confirms that the installation is safe. The evidence of this will be a valid in date EICR Certificate, with a Satisfactory status. Hexagon will not accept any other certificate or report to confirm this.
- 4.3. Hexagon will ensure that a full electrical installation inspection and test is undertaken in the case of a change of occupancy (void properties, mutual exchanges, and transfers), and when completing planned works within domestic properties; this will be evidenced through a satisfactory EICR or other report.
- 4.4. Hexagon will install, test, and replace (as required) battery/hard-wired smoke and carbon monoxide alarms as part of the annual gas safety check visit (or at void stage). We will ensure that all properties have a hard-wired smoke alarm system within 2 years following the approval of this policy. Where a property is outside of the annual gas safety check programme, this work will be completed during routine EICR checks every five years.
- 4.5. We will operate a robust process if there is difficulty gaining access to a property to carry out the electrical safety check or remediation works. We will use the legal remedies available within the terms of the tenancy agreement, lease or license provided the appropriate procedures have been followed and approval given by a Head of Service (or more senior role). Where resident vulnerability issues are known or identified, we will ensure that we safeguard the wellbeing of the resident and act in accordance with our Vulnerability and Reasonable Adjustments Policy.
- 4.6. Hexagon will ensure that there is a robust process in place for the management of immediately dangerous situations identified from the electrical safety check – see section 6 of the policy.

- 4.7. Hexagon will operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts/service level agreements are in place, conducting client-led performance meetings and ensuring that contractors' employee and public liability insurances are up to date on an annual basis.
- 4.8. Hexagon will operate measures to identify, manage and/or mitigate risks related to portable electrical appliances in the properties we are responsible for.
- 4.9. Hexagon will establish and maintain a risk assessment for electrical safety management and operations, setting out our key electrical safety risks and appropriate mitigations.
- 4.10. We will ensure there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to electrical safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

5. Programmes of Work

- 5.1. Electrical Testing Programme
- 5.2. Hexagon will carry out a programme of five yearly electrical installation inspections and tests to all domestic properties, communal blocks, and other properties (unless the competent person recommends an earlier next test date), and this will include the issuing of a new satisfactory EICR. The date of the inspection and test is driven from the anniversary date of the most recent EICR.
- 5.3. Properties managed by others – We will obtain EICRs where our properties are managed by a third party. If the third party does not provide the EICR, we will carry out the inspection and obtain the EICR, and re-charge them for the cost of this work.

6. Remedial Actions

- 6.1. Hexagon will endeavour to repair all Code 1 (C1) and Code 2 (C2) defects identified by an electrical installation inspection and test at the time of the check, to produce a satisfactory EICR. Where this is not possible, we will make the installation safe and return to complete the required remediation works within 28 days to ensure a satisfactory EICR is produced.
- 6.2. Where any C1 and C2 defects have been repaired, they will be recorded on the satisfactory EICR to provide an audit of the work completed.
- 6.3. Hexagon will review all Code 3 (C3) and Further Investigation observations and determine and take the most appropriate course of action.

7. Quality Assurance

7.1. We will ensure there is programme of third-party quality assurance audits of electrical safety checks. This will be:

- 7.1.1. 100% of new installations.
- 7.1.2. 10% sample of field checks
- 7.1.3. 100% of all certificates.

7.2. Internally we will undertake 100% desktop audits of all EICRs and other records and certificates.

7.3. Hexagon will commission an independent audit of electrical safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify any non-compliance issues. An action plan will be developed for any issues identified during the audit, with appropriate timescales agreed for corrective actions to be carried out.

8. Data and Records

8.1. Hexagon will maintain a core asset register of all properties we own or manage, with component/attribute data against each property to show electrical safety testing and inspection requirements.

8.2. Hexagon will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from the electrical safety programme and the programme remains up to date.

8.3. Hexagon will maintain accurate records, against each property we own and/or manage, of the following:

- 8.3.1. Inspection Dates
- 8.3.2. EICRs
- 8.3.3. Minor Electrical Works Certificates and Building Regulations Part P notifications associated with remedial works.
- 8.3.4. Electrical Installation Certificates

8.4. Hexagon will hold the dates of the safety checks in our IT systems and safety check records will be stored on the central server.

8.5. Hexagon will keep all records and data in line with our document retention policy. We will keep at least the two most recent EICR records or certificates. We will

have robust processes and controls in place to maintain appropriate levels of security for all electrical safety related data.

9. Resident Engagement

- 9.1. Hexagon consider good communication essential in the effective delivery of electrical safety programmes, therefore we will establish a resident engagement strategy and communication programme to support residents in their understanding of electrical safety.
- 9.2. This will assist us in maximising access to carry out electrical inspections, encourage and support residents to report any concerns about electrical safety, and help us to engage with vulnerable and hard to reach residents.
- 9.3. We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on our website.

10. Competent Persons

- 10.1. Hexagon must appoint an officer who will become the Responsible Person and a Deputy Responsible Person, they should both be trained, instructed, and informed to the same level and will be responsible for the delivery of Electrical Safety.
- 10.2. The operational lead will hold the Level 4 VRQ in Electrical Safety Management or Level 4 VRQ Diploma in Asset and Building Management (or equivalent). If they do not have this already, they will obtain it within 12 months of the approval of this policy.
 - 10.2.1. Lead Responsible Officer – Head of Property Safety
 - 10.2.2. Deputy Responsible Officer – Electrical & M&E Project Manager
- 10.3. Only suitably competent NICEIC (or equivalent) electrical contractors and operatives will undertake electrical works on our behalf.
- 10.4. Only suitably competent NICEIC (or equivalent) third party technical auditors will undertake quality assurance checks.
- 10.5. Hexagon will ensure that our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor's certification appropriately.

11. Training

11.1. Hexagon will deliver training on this policy and the procedures that support it, through appropriate methods including team briefings; basic electrical safety awareness training; and on the job training for those delivering the electrical safety programme, planned maintenance and repair works as part of their daily job. All training undertaken by staff will be formally recorded.

12. Performance Reporting

12.1. We will report robust performance indicator (PI) measures for electrical safety that follow the principles set out in the Tenant Satisfaction Measures (TSMs) which came in to force 01 April 2023. Although electrical safety is not specifically covered by these measures, we will adopt the same approach to ensure consistency with other compliance areas and ensure all dwellings at risk are accounted for.

12.2. Performance will be reported internally monthly to our Directors Group and quarterly to Board. The position reported will be based on the following criteria:

12.3. **Data** – The total number of:

12.3.1. Properties – Communal Blocks, Commercial and other properties

12.3.2. Properties on the Electrical Inspection programme

12.3.3. Properties not on Electrical Inspection programme

12.3.4. Properties with a valid and in date survey / re-inspection

12.3.5. Properties without a valid and in date survey / re-inspection

12.3.6. Properties due to be surveyed / re-inspected with the next 30 days.

12.3.7. Completed, in time and overdue follow up / remedial actions arising from surveys.

12.4. **Narrative** – an explanation of the:

12.4.1. Current Position

12.4.2. Corrective action required.

12.4.3. Anticipated impact of corrective action

12.4.4. Progress with completion of follow up / remedial works.

12.5. In addition:

12.5.1. The number of RIDDOR notifications to the HSE with regards to electrical safety

13. Significant Non-Compliance and Escalation

- 13.1. Our definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Hexagon employee becoming aware of it.
- 13.2. Any non-compliance issue identified at an operational level will be formally reported to the Head of Property Safety in the first instance, who will agree an appropriate course of corrective action with the Director of Operations and report details of the same to the Directors Group.
- 13.3. In cases of serious non-compliance, the Directors Group and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by their regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

14. Policy Review Frequency

- 14.1. This policy will be reviewed every two years, or earlier if there is a planned change in legislation or regulation.

15. Equality and Diversity

- 15.1. Hexagon aims to understand the diverse needs of residents and deliver fair and equitable outcomes under this policy. We commit to considering reasonable adjustments in the delivery of our services to accommodate the diverse needs of residents and their household members.
- 15.2. An equality and diversity impact assessment has been carried out and is attached as an appendix to this Policy.
- 15.3. This Policy will be enacted in line with our Vulnerable Residents and Reasonable Adjustments Policy and in compliance with our obligations under the Equality Act 2010 and the Regulator of Social Housing's Consumer Regulations.

16. Data Protection

- 16.1. This Policy will be enacted in line with our Data Protection framework, and in line with the UK GDPR and Data Protection Act 2018.

16.2. If you want more information about how your personal data is processed under this policy, please contact our data protection team at dprotection@hexagon.org.uk or call our office.

17. Legal Framework

Hexagon have given regard to the following legislation and guidance in preparing this policy.

17.1. Housing Act 2004

17.2. Social Housing Regulation Act 2023

17.3. Landlord and Tenant Act 1985

17.4. Homes (Fitness for Human Habitation) Act 2018

17.5. The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020

17.6. Electricity at Work Regulations 1989

17.7. Electrical Equipment (Safety) Regulations 2016

17.8. INDG236 - Maintaining portable electrical equipment in low-risk environments (2013)

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

17.10. Code of Practice for the Management of Electrotechnical Care in Social Housing (2019)

17.11. The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (IET) 2020 (5th edition)

17.12. IET Wiring Regulations: 18th Edition BS7671 (Amended 2022)

17.13. Reporting of Injuries, Diseases and Dangerous Occurrences Regulation 2013 (RIDDOR)

18. Regulatory Standards

18.1. We must ensure we comply with the Regulator of Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

19. Sanctions

19.1. Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; prosecution under any of the principal legislation listed in 5.1; and via a regulatory notice from the Regulator of Social Housing.

20. Supporting Documents & Policies

20.1. Hexagon Electrical Safety Management Plan

20.2. Hexagon Tenancy Agreement

20.3. Hexagon Health & Safety Policy

Appendix 1: Equality Impact Assessment

Hexagon’s Vulnerable Residents and Reasonable Adjustments Policy commits the organisation to understanding the diverse needs of residents and, where there are any barriers to accessing the service or any disproportionate negative impact, considering reasonable adjustments to ensure a fair and equitable outcome for all residents.

Hexagon recognises that responding and reacting to the changing needs of residents requires a willingness to do things differently and find individual solutions to ensure equitable access to our services for all. The following table will propose how we will adjust the service to account for possible requirements of different groups, to help us to prepare for these expected needs. However, we recognise that we cannot anticipate every need and that there is not a one-size-fits-all solution to all needs, so we will continue to be responsive and flexible in adapting to the diverse needs of residents in enacting this policy.

See the Vulnerable Residents and Reasonable Adjustments Policy for examples of Reasonable Adjustments we will consider. When considering what is reasonable, we will take into account: The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the person with a disability; The practicality of us making the adjustments; The availability of our resources, including external assistance and finance; Any disruption to the service that making the adjustment may cause.

Characteristic	Impact	Explanation of Impact	Reasonable Adjustments Considered	Consideration of effectiveness, practicality, cost/availability of resources and any disruption to service	Decision on whether to implement the Reasonable Adjustment
Age	None				
Pregnancy/ Maternity	None				
Disability: Physical health and mobility	None				
Disability: Learning and neurodiversity	None	Any resident with support needs we would either work through their support worker or utilise			

		our Tenancy Sustainment Team.			
Disability: Vision and hearing	None	As above			
Disability: Mental health	None	As above			
Sex	None				
Gender reassignment / Transgender / Non-binary identity	None				
Race or nationality	None				
Religion or belief	None				
Sexual orientation	None				
Language	None	We provide translation services for residents who cannot read or communicate in English or have no support network who can assist them.			
Literacy	None				

Outcome

Where any negative impact is identified, have changes to the policy or sufficient reasonable adjustments been proposed to mitigate the impact?	
No negative impacts identified.	
How will the reasonable adjustments be facilitated and communicated to residents?	
Any reasonable adjustments will be put in place – in line with our Vulnerability and Reasonable Adjustments Policy and Procedure – to support residents to access services. The adjustments will be reviewed regularly.	
What are the arrangements for monitoring and reporting on the impact on residents, the diverse needs of residents using the service, and the implementation of reasonable adjustments?	
The Property Safety Team will consider the profile of residents accessing the service as part of its annual review to Directors Group and as part of the deep dive report to Board. Currently the compliance activities of the organisation are not linked to resident profiling information – although this link will be made from April 2025.	
Are you satisfied that we have met our duties under the Equality Act 2010 and the Consumer Regulations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Name and Job Role of person completing this form:	Andy Vincent Operations Director