

Dover District Council

Electrical Safety Policy



Contents

1. Introduction	3
2. Definitions	3
3. Policy purpose and scope	4
4. Policy aims	4
5. Legal duties	4
Legal duties owed to employees	4
Legal duties owed to tenants	5
Additional legislation, regulations and associated documents	5
6. Policy Statements	6
Roles and responsibilities	6
Inspection Programmes	7
Follow up work	8
Competency and compliance	8
Record keeping	8
Performance reporting	9
Quality assurance	9
Non-compliance / escalation process	9
7. Implementation, monitoring and review	10
8. Complaints	10
9. Equality, diversity and inclusion	11
10. Data protection and confidentiality	11
11. Version control	11



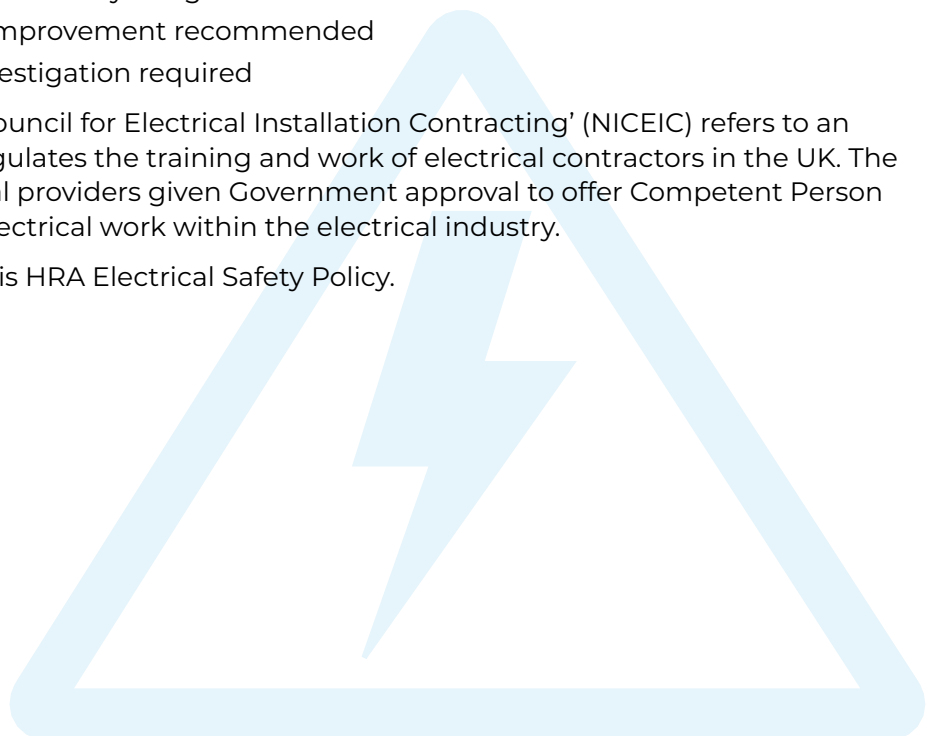
1. Introduction

- 1.1 Dover District Council ("the Council") are responsible for maintaining and repairing properties within its Housing Revenue Account (HRA) including its shared areas. The Policy outlines the measures the Council will take to ensure the safety of our electrical systems in the HRA properties. The Landlord and Tenant Act 1985 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. To ensure safe electrical systems within our domestic buildings, the Council will follow IET Wiring Regulations, BSI National Standard 7671.

2. Definitions

- 2.1 For the purposes of this policy:

- 'We', 'ours', 'us', and 'landlord' refers to Dover District Council. We are the landlord because we own and manage homes through the HRA tenancy agreement.
- 'Staff' refers to members of staff who provide housing related services for us, including housing management, housing options, strategic housing, and property services.
- 'Contractors' refers to third party organisations who provide housing-related services on our behalf.
- 'Tenants' refers to an individual or individuals who have an active tenancy agreement with the Council and live in and rent a Council-owned property.
- 'Electrical Installation Condition Report' (EICR) refers to a formal document that is produced following an assessment of the electrical installation within a property. It must be carried out by an experienced qualified electrician or approved contractor.
- EICR codes are a set of classifications used within an Electrical Installation Condition Report to indicate the state of electrical installations in a property:
 - Code 1 (C1) means danger present
 - Code 2 (C2) means potentially dangerous
 - Code 3 (C3) means improvement recommended
 - FI means further investigation required
- 'National Inspection Council for Electrical Installation Contracting' (NICEIC) refers to 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.
- The 'Policy' refers to this HRA Electrical Safety Policy.



3. Policy purpose and scope

- 3.1 The purpose of this Policy and its associated procedures is to set out how the Council will comply with electrical safety legislation and to provide assurance that there are measures to identify, manage and/or mitigate risks associated with electrical installations and appliances which we have provided and responsible for.
- 3.2 We are responsible for maintenance and repairs to our buildings within our Housing Revenue Account (HRA), this includes Council properties with an active tenancy agreement, void/empty properties, and internal and external shared areas of properties owned or partially owned by the Council.
- 3.3 This policy and associated procedures must be used by all Council staff and contractors working on the Council's behalf to ensure they understand the obligations placed upon the Council to maintain a safe environment.
- 3.4 The Policy should be read alongside the following policies:
 - Vulnerable Tenant Policy

4. Policy aims

- 4.1 The aim of the Policy is to take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas (shared areas); the specific aims of the Policy are:
 - 1) Electrical systems are well maintained to reduce the risk of harm or property damage.
 - 2) Council staff and contractors are clear and confident about our responsibilities and procedures relating to electrical systems in accordance with relevant and applicable guidance.
 - 3) The operation of electrical systems is prolonged through proper maintenance and inspections.
 - 4) Establish a system to record inspections, tests and maintenance activities to monitor compliance for electrical safety.

5. Legal duties

Legal duties owed to employees

- 5.1 Health and Safety at Work Act 1974 is the primary piece of legislation covering occupational health and safety. The Act requires employers to ensure their work environments are safe and free from risks to health. It sets out the duties which:
 - Employers have towards employees and members of the public
 - Employees have to themselves and to each other
- 5.2 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.

- 5.3 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) is the law that requires employers, and other people in charge of work premises to inform the Health and Safety Executive (HSE) or relevant enforcing authority that a work-related accident or incident has happened. This is so that the HSE can respond to ensure compliance with health and safety law, we must report and keep records of all:
- work-related fatalities
 - work-related reportable injuries
 - diagnosed cases of reportable occupational diseases
 - certain dangerous occurrences (incidents with the potential to cause harm)

Legal duties owed to tenants

- 5.4 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.
- 5.5 Landlord and Tenant Act 1985 states that a landlord must keep in repair and proper working order the installations in the dwelling house for electricity.
- 5.6 The Housing Act 2004 introduces the Housing Health and Safety Rating System (HHSRS) which identifies whether any specified hazards are present and categorises those hazards according to objective criteria. A hazard is any risk of harm to the health or safety of an actual or potential occupier of accommodation that arises from a deficiency in the dwelling, building or land in the vicinity.
- 5.7 The Homes (Fitness for Human Habitation) Act 2018 amends the Landlord and Tenant Act 1985 to require all landlords to ensure that their properties, including any common parts of the building, are fit for human habitation at the beginning of the tenancy and throughout.
- 5.8 The Social Housing (Regulation) Act 2023 introduced new rules that social housing landlords must comply with regarding the safety and quality of homes. The revised consumer standards set a requirement for social housing landlords to take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal (shared) areas. Registered providers must also provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal (shared) areas for which they are responsible.

Additional legislation, regulations and associated documents

- 5.9 The Electrical Safety Policy also operates in the context of, but is not limited to:
- Corporate Manslaughter and Corporate Homicide Act 2007
 - Electricity at Work Regulations 1989
 - Electrical Equipment (Safety) Regulations 2016
 - IET Wiring Regulations British Standard 7671: 2018 (18th edition)
 - The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE) 2012 (5th edition)
 - HSE INDG236: 'Maintaining portable electrical equipment in low-risk environments' (as amended 2013)
 - Electrical Safety Council: 'Landlords' Guide to Electrical Safety 2009'
 - Code of Practice for the Management of Electrotechnical Care in Social Housing (January 2019)
 - Approved Document P of the Building Regulations 2010
 - BSN62305 Lightning Damage

- The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health Safety and Welfare) Regulations 1992
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- The Occupiers' Liability Act 1984
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Regulatory Reform (Fire Safety) Order 2005
- Construction, Design and Management Regulations 2015
- Draft Statutory Instrument - Electrical Safety Standards in the Private Rented Sector (England) (Amendment) (Extension to the Social Rented Sector) Regulations 2025

6. Policy Statements

Roles and responsibilities

- 6.1 Staff are responsible for complying with safety legislation, this Policy, and associated processes when testing and inspecting electrical installations and appliances. Staff are also responsible for attending training when required as appropriate for their role.
- 6.2 The housing management team will provide key support in gaining access into properties where access is proving difficult in accordance with our tenancy agreement.
- 6.3 Contractors are responsible for complying with all relevant electrical and safety legislation in force at the time.
- 6.4 Cabinet will receive 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. This is the same report detailed in paragraphs 6.32 and 6.33.
- 6.5 The Head of Property Assets has strategic responsibility for the management of electrical safety and for ensuring compliance is achieved and maintained, they will:
 - Oversee the implementation of the Policy.
 - Be responsible for overseeing the delivery of the agreed electrical inspection programme.
 - Prioritise and implement any works which arise from the electrical safety inspections.
- 6.6 As per the Social Housing (Regulations) Act 2023 (amending the Housing and Regeneration Act 2008), our designated health and safety lead has the following responsibilities in relation to the health and safety of tenants:
 - Monitoring compliance with health and safety requirements.
 - Assessing risks of failing to comply with these requirements.
 - Assessing hazards under the Housing Act 2004.
 - Notifying the Regulator of Social Housing about:
 - Risks of material failures.
 - Actual material failures.
 - Providing advice to the responsible body as to how we should address these risks and failures to ensure compliance.

Information on our designated health and safety lead is available on our website.

Inspection Programmes

- 6.7 In order to be compliant with legal and regulatory duties outlined in section 5, electrical installations are required to be periodically inspected and tested. The intervals between inspections should be no longer than 5 years; any deviation from these intervals should be at the recommendation of a competent NICEIC qualified (or equivalent) person and this will include issuing a new EICR.
- 6.8 Electrical safety testing and inspection is driven by:
- The anniversary date of the most recent EICR
 - Condition of the property
 - End of tenancy
 - Start of a new tenancy
 - Any other health and safety concerns
 - Planned capital work
 - Mutual exchange
- 6.9 All relevant compliance documentation for new builds will be provided to us at handover.
- 6.10 All electrical installations should be inspected and tested prior to the commencement of any new tenancies, mutual exchanges and transfers, and a satisfactory Electrical Installation Condition Report (EICR) should be issued to the tenant prior to them moving in.
- 6.11 We will carry out electrical installation inspection and tests and issue new satisfactory EICRs when completing planned capital works. Safety alarms will be tested as part of the EICR and replaced in accordance with the expiry date.
- 6.12 We will carry out Portable Appliance Testing (PAT) annually in our independent living schemes for every electrical communal appliance.
- 6.13 You must not store or charge any mobility scooter, e-scooter or battery, petrol or diesel powered vehicle or machinery in your home or any shared areas, internal or external, without our written permission
- 6.14 You must not run any cables from your property or use the mains electrics to charge electric vehicles (EV), mobility scooter, e-scooter or any other battery-operated vehicle.
- 6.15 We will implement data reconciliation process to deal with all changes to stock, including new property acquisitions, disposals and stock transfers, to ensure that properties are not omitted from the inspection programme, and to ensure the programme remains up to date.
- 6.16 **Access to properties**
- Our tenancy agreement outlines that tenants must allow staff, contractor operatives, or agents acting on our behalf to enter the property at reasonable hours on requests for the purposes of inspecting the property or carrying out any works including electrical safety checks. Unless otherwise agreed or in an emergency, or we are investigating alleged tenancy breaches, we will give tenants at least 24 hours' notice.
 - We will have a robust controlled access process in place should any tenant refuse access to carry out essential electrical safety related inspection and remediation works.
 - In accordance with our Vulnerable Tenant Policy, if the tenant's vulnerability is preventing the Council from entering the property to carry out and complete repairs and maintenance, we will work with the tenant to make adjustments that are reasonable and justified while allowing us to carry out the repair work.

Follow up work

- 6.17 We will ensure there is a robust process in place for the management of any follow-up work required following the completion of a periodic inspection and test of an electrical installation.
- 6.18 We will, as a minimum, repair or isolate all C1 safety issues at the time of the inspection. Any C2 works which cannot be completed at the time of the inspection and test will be completed as soon as possible. A satisfactory EICR will only be issued once the C2 is resolved. C3 and FI works will be referred back to Property Services for a decision.

Competency and compliance

- 6.19 We will ensure that the manager with lead responsibility for operational delivery is appropriately qualified and experienced, holding one of the following:
- Level 4 VRQ in Electrical Safety Management (or equivalent);
 - A minimum of a level 4 qualification in a related subject such as Level 4 VRQ Diploma in Asset and Building Management Compliance;
 - Or qualification and/or experience of equal standing.
- 6.20 We will fund training as necessary; the manager with lead responsibility for operational delivery will gain this qualification and membership. Any new employee will commence any required qualification within 12 months of the start of employment.
- 6.21 We will ensure that all operatives (internal or employed by external contractors) maintain approved electrical contractor accreditation with the NICEIC or equivalent for all areas of electrical inspection, testing, installation and repair works that they undertake.
- 6.22 The Property Assets team will check relevant qualifications to ensure that all persons are appropriately qualified for the work that they are carrying out. These checks will be undertaken on an annual basis and evidenced appropriately.
- 6.23 We will ensure that all contractors' employee and public liability insurances are up to date on an annual basis. Furthermore, contracts/service level agreements will be in place with the contractors responsible for delivering the compliance service.
- 6.24 We will ensure that only suitably competent NICEIC or equivalent electrical contractors and engineers (or equivalent) undertake electrical works for the organisation.
- 6.25 We will ensure that all replacements, modifications of electrical systems within our properties will comply with all elements of Part P, of the Building Regulations 2010.

Record keeping

- 6.26 We will hold accurate records against each property we own or manage, identifying when the electrical system was last inspected and tested.
- 6.27 Inspection and re-inspection dates, along with EICR records, will be held electronically for a period of not less than 5 years or where superseded by works. A safety inspection will be undertaken sooner than the stated period if recommended by the competent person or for reasons listed in paragraph 6.8.
- 6.28 We will establish and maintain accurate records of all completed EICRs, Minor Electrical Works Certificates (MEIWC) and Building Regulation Part P notifications associated with remedial works from these reports, and Electrical Installation Certificates.
- 6.29 We will hold and maintain accurate records on the qualifications of all engineers undertaking electrical safety works for the organisation.

- 6.30 We will have controls in place to provide and maintain appropriate levels of security for all electrical safety related data.
- 6.31 We will collate and store all EICRs and associated records and certification of completed remedial works to accurately inform inspection programmes.

Performance reporting

- 6.32 Robust Key Performance Indicator (KPI) measures will be established and maintained to ensure we are able to report on performance in relation to electrical safety. We will also provide further information on our position within our narrative to enable understanding.
- 6.33 KPI measures will be produced and provided to the Corporate Management Team (CMT) and Cabinet on a quarterly basis. These KPI measures may include reporting on:

Data – the total number of:

- Properties – split by domestic properties and communal installations (installations in shared areas);
- Properties on the electrical inspection and testing programme;
- Properties not on the electrical inspection and testing programme;
- Properties with a valid 'in date' EICR (in line with a maximum 5 year re-inspection period). This is the level of compliance expressed as a number and a %;
- Properties where the EICR has expired and is 'out of date' (according to a maximum 5 year re-inspection period). This is the level of non-compliance expressed as a number and a %.

Narrative - an explanation of the:

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

Quality assurance

- 6.34 We will appoint an independent competent person and/or consultant to complete an audit of compliance at least once every two years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues for correction.

Non-compliance / escalation process

- 6.35 The definition of non-compliance in relation to this policy refers to any incident which results in a potential breach of legislation or regulatory standard, or which causes or has the potential to cause a significant risk to health or safety, including RIDDOR (see paragraph 5.3).
- 6.36 Any non-compliance issue identified at an operational level will be formally reported to the Head of Property Assets and Designated Health and Safety Lead in the first instance.
- 6.37 The Head of Property Assets will agree an appropriate course of corrective action with the relevant operational teams to address the non-compliance issue and report details of the same to CMT.
- 6.38 CMT will ensure the Portfolio Holder for Housing, Skills and Education is made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

7. Implementation, monitoring and review

- 7.1 Monitoring is necessary to ensure that the Council delivers the aims and objectives set out in this Policy. Senior Managers will be responsible for ensuring that staff are complying with this Policy and national guidance on electrical testing and inspections.
- 7.2 Staff will be provided with procedures to ensure that they comply with the Policy provisions and both legislation and regulation. The procedures will also ensure that staff provide a consistent approach to electrical testing and inspections.
- 7.3 This Policy will be reviewed every three years, or in response to relevant changes in legislation, organisational structure, development of good practice, or to address operational issues.
- 7.4 Any minor amendments required will be made by Officers of the Council. Any significant amendments required as a result of changes to legislation or regulation, or Council operations, will be approved by the Council's cabinet. Where significant changes are required, relevant Officers and teams will be consulted before these are implemented.

8. Complaints

- 8.1 The Council's definition of a complaint is:
"An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or a group of residents."
- 8.2 The Council takes complaints made about any service it provides, officers who work for the Council or contractors who provide our services, seriously. If a tenant wishes to make a complaint about the service they have received, a Council officer or contractor, they can be made:
- In writing (letter or email)
 - Using our online complaint form
 - Using the Council's Complaint Leaflets (these are available at the Council's office reception, or our residents can request them to be posted)
 - Via telephone; or
 - In person by an appointment
- 8.3 Reasonable adjustments will be made during the complaints process for vulnerable residents (please see our Vulnerable Tenant Policy).
- 8.4 All complaints received will be dealt with in accordance with the Council's Complaints Policy and Procedure. More information about how to make a complaint can be found on our website: [If you are unhappy \(dover.gov.uk\)](https://www.dover.gov.uk/if-you-are-unhappy).

9. Equality, diversity and inclusion

- 9.1 The Council is committed to promoting equality of opportunity and to eliminating unlawful discrimination on the grounds of race, age, disability, gender, sexual orientation, religion, belief, financial status, and any other difference that can lead to discrimination or unfair treatment considering the principles of the Equality Act 2010. Please see our Equality Policy for more details.
- 9.2 A full Equality Impact Assessment (EIA) was conducted for this policy in accordance with our Public Sector Equality Duty (PSED) when carrying out our duties (s149 of Equality Act 2010). The overall impact for each characteristic is deemed to be positive. Where potential negative impacts to individuals have been identified, particularly in relation to age and disability, mitigative actions have been documented on the EIA.

10. Data protection and confidentiality

- 10.1 We process personal data in compliance with data protection legislation including the Data Protection Act 2018 & General Data Protection Regulation 2016. All processing of personal data will be done in line with the data protection principles and where appropriate the necessary exemption applied.
- 10.2 Full details of how we store and use personal information about our residents can be found on our website and in our privacy statement at www.dover.gov.uk/privacy. This will also contain contact information if you have any questions or require assistance from the data protection/information governance team.

11. Version control

Approval date	September 2025
Approved by	Cabinet
Policy owner	Property Assets
Scheduled review	September 2028

Policy controls sheet		
Date	Summary of change	Author and approver
		Author: Approver: