

# Electrical Safety Policy



<i>Purpose of the policy:</i>	To establish DPHA's policy and set out our position on Electrical Safety.
<i>Guidance used for developing the policy:</i>	EVH landlord Safety Manual
<i>Policy complies with the following Regulatory Standards:</i>	<p>1. The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.</p> <p>2. The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.</p> <p>4. The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.</p> <p>5: The RSL conducts its affairs with honesty and integrity.</p>
<i>Policy is linked to the following DPHA policies:</i>	<p>Repair and Maintenance Policy</p> <p>Privacy Policy</p> <p>Equality &amp; Human Rights Policy</p> <p>Complaints Policy</p> <p>Void Management Policy</p> <p>EVH Landlord Safety Manual</p>
<i>Date Policy last reviewed:</i>	New Policy
<i>Date revised policy approved by the Board of Management (or People &amp; Policy Sub-Committee if delegated):</i>	<p>People &amp; Policy Sub-Committee approved on the 16 September 2025.</p> <p>Recommended to Board and approved on 30<sup>th</sup> September 2025</p>
<i>Date policy is next due to be revised:</i>	September 2028
<i>Equality Impact Assessment carried out for policy?</i>	Yes
<i>Publish revised policy published on the website?</i>	Yes

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## **1.0 INTRODUCTION**

- 1.1 The Regulations in respect of Electrical safety aim to prevent injury to customers and the public from any electrical installation. Landlords have duties to ensure that the electrical installations, fixtures, fittings and any electrical equipment provided within our properties are always maintained in a safe condition and checked for safety every 5 years and at the Void stage prior to any new tenants moving in. A copy of the safety check record is provided to the tenant, the record will be kept by the landlord for a minimum of 5 years, from the date of the check.

## **2.0 ELECTRICAL SAFETY AND RELATED LEGISLATION**

- 2.1 DPHA has a duty of care towards the health & safety of its tenants, staff, contractors and other users or visitors to the buildings that it owns.
- 2.2 When implementing the Electrical Safety Policy, the Association staff and contracted staff must comply with the following legal and regulatory framework:
- Health & Safety at Work Act 1974
  - The Management of Health & Safety at Work Regulations 1999
  - Housing (Scotland Act) 2014 as amended
  - The Building (Scotland) Act 2004 and subsequent amendments
  - The Electricity at Work Regulations 1989
  - BS 7671:2018 Requirements for Electrical Installations (the “18th Edition of the Wiring Regulations”)
  - Landlords Guide to Electrical Safety Scotland 2017
  - The Consumer Protection Act 1987
  - The Electrical Equipment (Safety) Regulations 1994
  
  - Scottish Social Housing Charter
  - Scottish Housing Quality Standards

## **3.0 POLICY STATEMENT**

- 3.1 The Policy outlines DPHA’s responsibilities to comply with the relevant legislation and regulatory guidance on the installation, inspection, repair, testing and certification of electrical systems in the properties that it owns to ensure that all the electrical installations are in a good condition and are safe to use.

- 3.2 All of DPHA's housing stock is within the scope of this policy as well as the common areas and other non-domestic areas like the office or Sheltered Housing common rooms.
- 3.3 DPHA will comply fully with its statutory obligations as laid out in the legislation as specified at Section 2 and ensure that effective procedures are in place to ensure such compliance. In particular, the Association shall ensure full compliance with regulation that places duties on the Association to:
- Ensure the prevention of exposure to risks associated with electricity are met
  - Ensure that any regulatory, statutory, contractual requirements are met in relation to electrical safety.
  - Promote awareness of the risks of electrical safety and DPHA's associated procedures through ongoing training and induction of relevant staff
  - Implement an effective electrical safety process and procedure in order that appropriate measure are met.
  - Ensure that any Housing Software is capable of storing, maintaining and recording compliance with all requirements.
  - Ensure periodic inspection is carried out to ensure that the condition of the electrical wiring meet BS:7671:2018+A2:2022.
  - Retain a record of each safety check for at least 5 years.
  - Ensure an Electrical Inspection Condition Report (EICR) is completed in accordance with the 18<sup>th</sup> edition IET wiring regulation. Any faults such as C1, C3 and F1 found during inspection of the wiring, remedial works will be carried out to ensure safety within the system.
  - Ensure the Contractors or Sub-contractors are a member of an accredited registration scheme operated by a recognised body (NICEIC or SELECT)
  - Ensure Portable Appliance Testing is carried out in accordance with the Electrical Equipment (Safety) Regulation 2016.
  - Issue a copy of the safety check to any new tenant before they move in and to provide a copy of the most up to date certificate to any tenant on request.
  - Ensure all electrical installations (including any appliance left by a previous tenant) is safe or otherwise removed before re-letting.
- 3.2 This policy does not apply to owners using the Associations factoring services.

#### **4. ROLES & RESPONSIBILITIES**

4.1 The Chief Executive Officer is the designated Duty Holder, and the Board of Management has overall responsibility for ensuring adequate resources are made available to enable the objectives of the policy to be met.

4.2 The Customer Services Manager has been delegated the responsible person role for the implementation of this policy. The Senior Customer Services Officer will be the depute responsible person. Their responsibilities include:

- Delivery of the key policy objectives as set out herein including designing and implementing procedures, staff training and communications to customers.
- Responsible for operational delivery, including the management of all contractors carrying out electrical works.

4.3 The Association will employ robust monitoring to ensure it achieves full compliance with all aspects of the Regulations. In particular, the Association shall employ the following procedures:

- The Customer Services Manager is responsible for delivering this policy supported by the Asset Officers and Senior Customer Service Officer.
- The progress of maintaining the 5 yearly inspection schedule is to be monitored through Homemaster monthly by the Customer Services Advisors with a report given to the Asset Officer of inspections falling within the next 2-month period.
- The day-to-day management of EICR Management will be carried out by the Asset Officer supported by the Customer Services Advisors.

4.4 The Senior Customer Services Officer is responsible for performance/compliance monitoring and will report on a quarterly basis to the Board including:

- Compliance with regulatory requirements.
- Properties that have not been serviced on time
- Action taken on properties where access cannot be gained
- Annual Return on Charter to Scottish Housing Regulator on number of EICR's not completed within the 5-year cycle.

#### **5.0 PROCUREMENT OF ELECTRICAL SAFETY AND SERVICING CONTRACTS**

5.1 The Electrical Safety procedures are managed internally by DPHA Asset Officers but should the need arise in the future the Association will tender for Electrical Safety and Service contracts in line with its Procurement policy.

## 6.0 PERIODIC ELECTRICAL SAFETY REQUIREMENTS

- 6.1 EICRs (Electrical Installation Compliance Report) are produced after a comprehensive test of the existing electrical installation and associated accessories has been carried out by a competent person suitably trained to do so. It involves a visual inspection and electronic testing of the installation and provides detailed information on the general condition and safety of the installation together with recommendations that may be required to make it safe.
- 6.2 In accordance with the wiring regulations the Association will ensure that all its properties will receive an inspection and test on the following frequencies as a minimum.

Property	Frequency
Domestic Property	Every 5 years
Void Property	Prior to let
Mutual Exchange	Prior to signing of agreement
Succession of Tenancy	Prior to signing of agreement
Assignment of Tenancy	Prior to signing of agreement
Communal Close lighting	Every 5 years
Landlords communal supply	Every 5 years
Private Street Lighting	Every 5 years
Office	Every 5 years

- 6.3 In order to ensure that there is approximately a similar number of inspections programmed for each year to make the contract more manageable and avoid staff resources from being stretched, consideration will be given to bringing forward a number of inspection dates if required. This would be reviewed annually to take into account un-programmed inspections such as ones undertaken for letting void properties
- 6.4 The Asset Officers can also instruct an EICR at any time for instances where a specific property may be considered electrically unsafe such as after a minor fire or recurring defects.
- 6.5 Observations noted during the testing and inspection process shall be addressed in the following manner in accordance with the severity of the situation.
- a) **Danger Present (C1)** – the safety of those using the installation is at risk and immediate remedial action is required. These will be rectified during the test, or the installation will be isolated.
  - b) **Potentially Dangerous (C2)** – those using the installation may not be at immediate risk, but urgent remedial action is required to remove potential danger. An attempt to remediate these defects will be made during the test, however, should further investigation or disruption be required an

appointment will be made to return at a date no later than 28 days.

- c) **Improvement recommended (C3)** – non-compliance with the current safety standard which presents no immediate or potential danger but may result in significant safety improvements if remedied. These defects will be recorded on the certificate and will be brought up to current day standards during future improvement or replacement works.
- d) **Further Investigation Required** - an appointment will be made to return at a date no later than 3 months.

## **7.0 TENANT RESPONSIBILITIES & ACCESS REQUIREMENTS**

- 7.1 The routine 5 yearly inspection process shall commence 4 years and 10 months after the last service date when the tenant is contacted by DPHA in writing) to advise the Electrical Safety Inspection is due.
- 7.2 DPHA will follow their access procedure (see Appendix 1) which involves a number of attempts to contact and access the tenants home and letters reminding the tenant of the health & safety implications of the inspections and their obligation to provide access as per the terms of the tenancy agreement.
- 7.3 Should any C1 fault be found, remedial work will be instructed within 1 working day and the tenant advised of the requirement to allow access for the remedial work to be carried out within the timescale of the certification.
- 7.4 Should no access be obtained through following the procedures (see Appendix 1) the tenant will be advised in writing, hand delivered to the property, that arrangements will be made to force access to the home. As per the terms of the tenancy agreement, to allow for the EICR inspection to be carried out.

## **8.0 COMMUNAL AREAS**

- 8.1 DPHA will arrange for an approved electrical contractor to undertake EICRs to the circuits for the stair lighting, door entry and TV aerial amplifiers and any other electrical appliances connected to the landlord's common supply. These will then be maintained on an ongoing basis and inspected on a routine 5 yearly inspection
- 8.3 The Association is also responsible for the maintenance of private street and car parking lighting within its property developments. Currently this is limited to the car park at Glebe Court with all other street lighting adopted by West Dunbartonshire Council. However, should in the future any street lighting be privatised these installations will be included within the common electrical testing regime.

## **9.0 EMERGENCY LIGHTING**

- 9.1 An Emergency lighting system is in place at DPHA main office, the common rooms at our Sheltered Housing complexes and at our HMO properties (Supported Housing of Multiple Occupation). They light common escape routes and are designed to automatically illuminate upon the failure of the power supply.
- 9.2 DPHA will carry out and record periodic inspections of the emergency lighting system at the office and common rooms. The Service Manager at the HMO will be responsible for carrying out the required inspection of the emergency lighting at the supported housing properties, this should form part of their own routine Health and Safety inspections. These systems will also be checked annually (at a minimum) as part of the routine Fire Safety inspections.

## **10.0 NEW INSTALLATIONS & ALTERATIONS**

- 10.1 The current 30-year life cycle for re-wiring properties used in our life cycle costings is merely a notional figure to ensure that sufficient future investment is available should it be required. This will be reviewed periodically to ensure that value for money is achieved by extending the life cycle to align with the recommendations within the ongoing EICRs that are being received.
- 10.2 Due to the significant disruption caused to tenants during a re-wiring programme there requires substantial evidence to suggest that there is a pattern of failures of cabling within electrical installations. DPHA will only carry out re-wires to properties where an EICR has highlighted evidence of deterioration in the existing wiring system and not merely to satisfy a notional cycle.
- 10.3 DPHA will consider undertaking partial replacement of electrical installations and fittings during the replacement process of other major component items such as kitchens, bathrooms and central heating systems. On such occasions the electrical contractor shall issue the Association with a Minor Electrical Works Certificate.

## **11.0 PORTABLE APPLIANCE TESTING (PAT)**

- 11.1 In the event that electrical appliances (e.g., electric kettles, fridges, washing machines etc.) provided as part of the tenancy agreement or management agreement in respect of supported accommodation, reasonable steps will be taken to ensure they remain safe.

- 11.2 A record will be maintained of the portable appliances used in each premises and they will be tested on a risk-based approach no longer than two years.
- 11.3 All portable appliances issued by the organisation will have the CE Mark, the British Standard Kitemark or the 'BEAB Approved' mark.
- 11.4 DPHA will issue tenants with a copy of the manufacturer's instructions for all appliances provided.
- 11.5 Should any faulty equipment be observed, DPHA will ask the tenant / service provider to take the item out of service until it is repaired or replaced.

## **12.0 POLICY REVIEW**

- 12.1 This policy will be reviewed every 3 years or sooner to ensure that the Association complies with the up-to-date legislation and guidance on electrical safety.
- 12.2 The Customer Services Manager will be responsible for ensuring that the policy is reviewed and submitted to the Board for approval as required.
- 12.3 The Electrical Safety Procedures associated with this Policy will be reviewed annually by the Senior Customer Services Officer and updated as required and issued to staff involved in the implementation of the Electrical Safety policy. The Senior Customer Services Officer will ensure that appropriate refresher training for relevant staff on tenant safety is carried out annually.

## **13.0 EQUALITY, DIVERSITY & INCLUSION**

- 13.1 We are committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all. This is reflected in our Equality, Diversity & Inclusion Policy.

## **14.0 COMPLAINTS**

- 14.1 Although we are committed to providing high levels of service, we accept that there may occasions where you may not be satisfied with the service you have received from us. We value all complaints and use this information to help us improve our services. Our Complaints Policy describes our complaints procedure and how to make a complaint.

## **15.0 DATA PROTECTION**

- 15.1 We will treat your personal data in line with our obligations under the current data protection regulations and our Privacy Policy. Information regarding how all data will be used and the basis for processing all data is provided in our Fair Processing Notice.

## APPENDIX 1

### ACCESS PROCEDURES

- **Letter 1** – issued 4 years and 10 months after the previous inspection date. Requests tenant to contact DPHA to arrange a suitable appointment date within 2 weeks.
- **Letter 2** - issued once the tenant has contacted to confirm the agreed appointment
- **Letter 3** - If within 2 weeks of issuing Letter 1 the tenant has not contacted DPHA an appointment is made with the contractor and tenant advised to be at home on the specified date and time to allow for the inspection to be carried out the following week
- **No access** – If access is not permitted following either Letter 2 or Letter 3. Letter 3 is sent again, offering the tenant a further opportunity to allow access.
- **Remedial Action Required** - If remedial work is required a further letter is issued to the tenant with another appointment date to allow for the identified remedial repairs to be carried out within the timeframe of the EICR certification.

### NO ACCESS PROCEDURES

In the event of no access after 2 attempts to access the property (see procedures above) and all efforts have been made to contact the tenant (by phone, email and emergency contact) , DPHA will issue a letter of Intention to Force Entry under the terms of the tenancy agreement no later than 2 weeks prior to the renewal date and not on a Friday, with Association staff and electrician in attendance. If there is no response to the Intention to Force Entry Letter within 7 days a further letter is to be hand delivered directly to the tenancy address. This final letter shall indicate the date and time (giving at least 24 hours' notice) when the proposed forced entry will be carried out on the day before the renewal date.