

Bromford Flagship

Electrical Safety Policy

Policy Statement & Purpose

The purpose of this policy is to demonstrate Bromford Flagship's commitment to ensuring the risk to people, buildings and the wider business are reduced as far as reasonably practicable while ensuring that all legislative requirements are met.

Our policies are supported by other documents including detailed procedures and processes to ensure that the policies are fully embedded into routine working practice.

Bromford Flagship are responsible for the servicing and maintenance of relevant electrical installations and appliances installed within its stock portfolio. In doing so Bromford Flagship are fully committed to meeting all applicable statutory & regulatory requirements, including best practice standards in electrical safety management, ensuring continual improvement in compliance performance and adopting a risk averse approach for any non-approved deviation from this Policy. Our *Board, as duty holder will receive assurance of statutory, legislative, and regulatory compliance at regular intervals for their review and scrutiny.

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1. Scope

This Policy covers Bromford Flagship Limited and its subsidiaries [excluding Gasway].

The scope of this Policy includes Fixed Wire Testing, Electrical Installations, Portable Appliance Testing, Automated Doors, Gates and Barriers, Lightning Protection Systems and Electric Vehicle Charging Points

1.1 The Electrical Safety Policy and associated procedure details how Bromford Flagship meets the requirements of the Code of Practice for the Management of Electrotechnical Care in Social Housing and all associated legislation and regulations. In addition to this, the policy provides assurance to Bromford Flagship that measures are in place to identify, manage and/or mitigate risks associated with electrical safety. Bromford Flagship will ensure compliance with electrical safety legislation and codes of practice and formally report at Executive and Board level, the details of any non-compliance and planned corrective actions.

**References to "the Board" in this document and our governance arrangements mean the coterminous Board acting as the Boards of Bromford Flagship Limited (BFL), Bromford Housing Association Limited (BHA), Flagship Housing Limited (FHL), Merlin Housing Society Limited (MHS) and Bromford Home Ownership Limited (BHO).*

1.2 The policy is relevant to all Bromford Flagship colleagues, customers, contractors and other persons or stakeholders 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 Bromford Flagship to maintain a safe environment for customers and colleagues within our buildings.

1.3 Bromford Flagship will follow a systematic approach to the management of electrical safety to ensure it meets the requirements set out in the Code of Practice and other relevant legislation relating to electrical safety. This is to ensure the safety of customers, leaseholders, colleagues and members of the public.

1.4 This policy applies to all Bromford Flagship domestic properties, communal areas, commercial properties, offices and buildings under its control or occupation. It also applies to any of our housing blocks and support schemes where the building is under our management. Where the building is controlled or managed by a third party then the responsibility for electrical safety in their designated areas must be agreed, formally documented and subsequently monitored, with the management company or commercial tenant unless this is otherwise stated in the management contract.

1.5 Bromford Flagship is not responsible for customer owned electrical appliances and permission must be sought for any alterations/additions to the electrical installation. More detail can be found in the Customer Alterations Policy.

2.0 Legislative Requirements

The application of this policy will ensure compliance with the Safety and Quality Standard (consumer standards) April 2024

2.1 Legislation

The principal legislation applicable to this policy are as follows:

- Provision and Use of Work Equipment Regulations 1998 (PUWER) Electrical Equipment (Safety) regulations 2016
- The Electricity at Work Regulations 1989
- Supply of Machinery (Safety) Regulations 2008 and BSEN 12453:2001
- Health & Safety at Work, etc. Act 1974
- Electrical Safety (Building Regulations) – Approved Document P (2013)
- Landlord and Tenant Act 1985 (as amended)
- The Housing Act 2004 (England and Wales)

2.2 Codes of Practice & British Standard

The principal Code of Practice and British Standards applicable to this policy are:

- The IET 18th Edition of the Wiring Regulations 2018:BS7671 Amendment 2
- BS EN 62305:3:2011: ‘Protection against Lightning
- Code of Practice for the Management of Electrotechnical Care in Social Housing- January 2019.

3. Responsibilities/Duty holder

Role	Responsibilities	Frequency
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Board	<ul style="list-style-type: none"> • They are the responsible legal entity and must oversee the discharge of the required standards. • They act as Duty Holders and are accountable for ensuring the implementation of this Policy and the associated Management Plans • They will receive assurance through regular performance reports that the Policy and Management Plan are being implemented and that the regulations are being fully complied with. • In doing so they will ensure the safety of colleagues, customers, contractors, and the wider public has not been compromised. • They will also ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested third parties, informed of the regulatory landlord compliance position. • The Board will be responsible for ensuring that any necessary remedial action, arising from performance reports, are undertaken to comply with the Policy and ensure that a regulatory landlord compliant position is maintained. • Will receive reports and commentary on Electrical Safety compliance performance at each meeting. 	6 Monthly/ Annually
Audit and Risk Committee	<ul style="list-style-type: none"> • Seek assurance that the regulations are being adhered to providing challenge on the adequacy of controls • # They will receive Internal Audit reports, and monitor the delivery of actions arising, through to successful completion. • # They will draw any concerns they may have arising from such reports to the attention of the Board • Provide critical friend support and advice 	Quarterly
Chief Executive Officer	<ul style="list-style-type: none"> • Retains the overall responsibility for the monitoring of the consistent implementation of this Policy and associated Management Plans to effectively comply with the regulatory standards. • If the regulatory standards are not maintained to report any breach in standards to the Board and Regulator of Social Housing. 	Ongoing
Disclosure Committee	<ul style="list-style-type: none"> • Provides oversight on the adequacy of assurance over regulatory requirements 	Regularly

	<ul style="list-style-type: none"> • Reviews external reporting prior to submission / publication • Delegates operational oversight to appropriate persons or groups as required to fulfil the above remit 	
Chief officers	<ul style="list-style-type: none"> • Appoint/nominate sufficient resources to fulfil the Responsible Person roles for all Electrical Safety requirements and use this Policy to define their duties. • Delegate appropriate authority for in-house delivery or procurement to meet the requirements. • Ensure that the conditions of all contracts are being fulfilled either by Internal Service Provider/s or external Contractors. • Will oversee the programme of Policy and Strategic Review • Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance. 	Ongoing
Senior leaders	<ul style="list-style-type: none"> • Agree and set budgets that are sufficient to meet the compliance requirements • Will ensure the operational delivery of this Policy and Management Plans and compliance with the regulations • Will manage the strategic implementation of this Policy and ensure compliance with all Regulations. • Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors (Internal and/or external) to address any delivery shortfalls. • Monitor the quality and correct storage of all certification and documents required to demonstrate Landlord Compliance. • Will provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. • Will implement Data Governance Protocols • Will receive audit feedback and act upon the findings. 	Ongoing
Delivery Teams	<ul style="list-style-type: none"> • Will formulate Programmes of Work consistent with the delivery of this Policy. • Will instruct/liase with internal operational managers and external Contractors in respect to the operational delivery of this Policy and Management Plan. 	Ongoing

	<ul style="list-style-type: none"> • Will liaise with Neighbourhood Management Team /Housing Team and customers to explain the importance of compliance and the need to achieve access to complete safety checks and works • Managing customer feedback (enquiries, complaints and compliments) handling and progress. • Liaise with IT and ensure system(s) and interfaces operate effectively • Will manage the availability of accurate Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts. • Will oversee the preparation of the KPI/MPI and OPI reporting suite 	
Colleagues	<ul style="list-style-type: none"> • Carrying out their work in line with this policy and associated procedures and processes • Applying Bromford Flagships DNA in everything they do • Reporting non-compliance to line management as soon as practically possible • Consider electrical safety in all our activities and notifying compliance leads of any activity which puts compliance at risk. 	Ongoing
Customers	<ul style="list-style-type: none"> • Agreeing to and keeping appointments to provide access. • Liaising with Bromford Flagship colleagues in relation to any poor service, failure to attend/poor repair etc. • Report any electrical failure, faults or defects impacting the safe electrical supply in their home. • Provide customer satisfaction information. 	As required
Contractors/Suppliers	<ul style="list-style-type: none"> • Operational delivery of Electrical Safety Inspections to Non-Domestic and Domestic Stock. • Operational delivery of Safety Inspections and Cyclical Maintenance to Portable Electrical Appliances, Power Operated (Automatic) Doors Gates and Barriers, Lightning Protection Systems (LPS) and Solar PV schemes. • Review Property addresses and reconcile with databases to ensure the programme remains accurate. • Liaise with customers in relation to arranging/keeping appointments. • Liaise with the delivery teams in relation to access issues. • Update system(s) with accurate data in line with Data Protocols. 	Ongoing

	<ul style="list-style-type: none"> • Provide appropriate, complete and correct certification for all Electrical Safety works. • Provide Quality Assurance (QA) checks in accordance with the contract. 	
Independent External assurance	<ul style="list-style-type: none"> • Undertake External Validation of Electrical Safety Inspections in line with the Management Plan. 	Ongoing
Internal Audit and assurance	<ul style="list-style-type: none"> • Conduct reviews according to audit and assurance plans as agreed with ARC 	Ongoing

*** Note*** – Responsibilities marked with a # will potentially move into a dedicated group once the merger has taken place.

4.0 Principles

Bromford Flagship will comply with statutory, legislative and regulatory standards and are committed to providing a robust, safe, efficient and cost-effective service to our customers in relation to the management of electrical safety. In respect of our responsibilities for electrical safety Bromford Flagship will:

- Provide clear lines of responsibility for the management of Fixed Wiring Systems, Portable Appliance Testing, Powered Doors, Gates and Barriers, Lightning Protection Systems, Electric Vehicle Chargers and Photovoltaic (PV) Systems supported by written guidance in the Electrical Safety Management Plans.
- Retain an adverse risk appetite in matters relating to electrical safety.
- Ensure robust electrical safety procedures are in place and adhered to by all colleagues. This will be achieved by providing relevant training for all colleagues involved with electrical safety.
- Ensure every contractor or consultant employed by Bromford Flagship to carry out works in our homes and buildings has the relevant licenses, registrations, accreditations, competencies and qualifications, as specified by the relevant regulations and Bromford Flagships procedures.
- Ensure colleagues receive appropriate training to fulfil their duties in relation to managing electrical safety.
- Fulfil our commitment to equality and diversity while delivering electrical services to our customers.

4.1 Fixed Wired Testing

- Ensure all communal areas hold a valid Electrical Installation Condition Report (EICR) within the cycle specified by the Competent Person undertaking the test but, in any event, at intervals not exceeding 5 years.
- Ensure inspections and testing of Fixed Wiring Systems within domestic properties take place on a 5-year cycle (or sooner if recommended by the Competent Person undertaking the test). Hold a valid EICR for all properties
- Ensure all domestic electrical installations are tested and certified prior to letting. If a property remains unoccupied for a period exceeding 6 months following its last test, a further EICR will be completed prior to occupation. Complete an Electrical Installation Condition Report on all new build properties that are handed over for let.
- In addition to checking all installations maintained by Bromford Flagship, inspect any electrical work carried out by the customer at the same time. Any works found to be

unsafe, or not complying with regulations will be disconnected and made safe appropriately at the time of inspection.

- Certain customer-own works will be allowed to be left in situ, such as light fixings and switches, which have been appropriately installed and deemed safe for continued use by the Competent Person completing the inspection (refer to Customer Alterations Policy)
- Prioritise remedial works arising from Fixed Wire Testing and apply a timescale for action, as detailed within the Electrical Safety Management Plan. All C1 (Immediately Dangerous) works will be resolved immediately. We will also aim to complete all C2 works (Potentially Dangerous) at the time of the inspection and testing. The property will only be considered compliant once evidence is provided that all C1 and C2 works are resolved.
- Ensure effective capture, monitoring and delivery of responsive repairs. Any reported defects, via the responsive repairs workstream, will be scheduled and executed within an appropriate timeframe in relation to the level of risk.

4.2 Portable Appliance Testing

- Risk assess all appliances and equipment provided by Bromford Flagship which are used by operatives, colleagues, residents, customers, and visitors and undertake Portable Appliance Testing (PAT) at a frequency arising from the risk assessed schedule as per the Code of Practice for In-service Inspection and Testing of Electrical Equipment. Bromford Flagship will retain appropriate documentation. Establish a cycle of subsequent re-testing at the time of the first test.

4.3 Automated Doors, Gates and Barriers

- Detail the frequency of inspections and procedures within the Electrical Safety Management Plan, but as a minimum this will be on an annual basis. Bromford Flagship will retain appropriate documentation.

4.4 Lightning Protection Systems

- Carry out inspection and testing on an 11-month rolling basis to ensure inspection and testing under different climatic conditions. Bromford Flagship will retain appropriate documentation.

4.5 Solar PV

- Conduct an inspection as part of the 5-year cyclical testing program. Bromford Flagship will retain appropriate documentation.

4.6 Electrical Vehicle Charging

- Conduct an inspection of the fixed wiring installation that serves the charging point as part of the 5-year Electrical Installation Condition Report. Bromford Flagship will retain appropriate documentation.

4.7 Electric Heating

- Carry out a visual inspection as part of the 5-year cyclical testing program and at change of tenancy. Bromford Flagship will retain appropriate documentation.

4.8 Additional Safety Measures

- Require that customer alterations should be subject to prior notification, agreement, and appropriate landlord’s permission (Refer to Customers Alteration Policy) from Bromford Flagship to proceed before they are undertaken – as is required by the Tenancy Agreement. Permission will not be unreasonably withheld. Any unauthorised alternations will be required to be removed by Bromford Flagship’s appointed contractor at the customer’s own expense.

4.9 Data

- Maintain an up-to-date Master Database of all properties where we have a responsibility to provide Electrical Safety Checks and maintenance including testing of Fixed Wiring Systems, Portable Appliances, Powered Doors, Gates and Barriers, Lightning Protection Systems, EV Chargers and Solar PV systems.
- For each relevant property record maintain up to date data confirming which of the systems and appliances within the scope of this Policy exist and do not exist and the organisation’s associated responsibility.
- Where a requirement exists hold data and certification relating to the last two Safety Checks and record the next due date.
- Where a requirement does not exist hold appropriate evidence.
- Maintain current and up to date records of remedial works for the entire portfolio which will detail all recommendations from the Fixed Wire Testing.

4.10 Access

- Have a robust process in place to gain access to homes and property for undertaking essential electrical safety inspection and works, in accordance with Bromford Flagships access procedures.
- Take appropriate legal action where customer refuse or fail to facilitate access to their home to undertake a test and inspection.

5. Linked documentations (including policies, procedures, standards, processes, reconciliation frameworks)

Bromford Flagship Documents	Bromford only	Flagship only
Customer Alterations Policy	Electrical Safety Procedures	The Electrical Safety Management Plan.
		The Electrical Safety Operational Guidance Notes.
		The Electrical Safety Protocol
		Data Governance Manual

6. External References

External references

Electrical Safety First <https://www.electricalsafetyfirst.org.uk/>

National Inspection Council for Electrical Installation Contracting <https://niceic.com/>

7.0 Competence and Training

We will commit to demonstrating a sufficient level of skill, knowledge and aptitude that shows we can provide good quality advice and services to our customers. Competence will be detailed through our process and procedure documentation and remain under continuous review to ensure we provide our services safely and by suitably trained colleagues in line with suitable accredited body.

8. Assurance Framework

Our risk appetite is averse for health and safety risks. We have zero tolerance for actions or omissions that could compromise the health and safety of individuals affected by our operations. We are committed to upholding the highest standards of health and safety compliance, proactively identifying and mitigating risks, and fostering a culture of safety throughout the organisation.

Our assurance framework should be read in conjunction with this document to understand how we undertake assurance in line with our risk appetite.

Specific first line assurance is detailed in the accompanying Electrical Management Plan/Procedure.

9. Document Details

Owner: Paul Coates- Chief Customer Officer

Approved By: Bromford Flagship Board

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Next Review Due: 28th February 2026

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Share to website: Yes/No

Version Control

Renewal Date	Version	Approved By	Comments