



HOUSING POLICY



LONDON BOROUGH OF
HARROW

Electrical Safety Policy

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1. Purpose

This policy details the London Borough of Harrow Housing Services approach to managing electrical safety and maintaining fixed, and where applicable, portable, electrical installations.

We take all reasonable and practical steps to eliminate, minimise and manage risks of electrical hazards to our customer and properties and to ensure that we meet all obligations in respect of electrical safety, in particular regarding the British Standard and the Guidance Notes.

This policy will establish the actions that the London Borough of Harrow (LBH) will take to deliver a periodic electrical inspection regime in line with the following recommendations:

- The British Standard BS:7671:2018 + A2:2022 Requirements for Electrical Installations.
- IET guidance notes 3: Inspection and Testing (the Guidance Notes).
- The policy will also outline the London Borough of Harrow's approach to undertaking Portable Appliance Testing (PAT) in line with:
- IET Code of Practice for In-service Inspection and Testing of Electrical Equipment.
- Maintenance of Lightning Protection Systems (LPS) in accordance with British Standard 62305 – Protection against lightning.

2. Scope

This policy applies to all fixed electrical installations within buildings and properties which the London Borough of Harrow holds a defined maintenance and repair responsibility for. This includes:

- Residential dwellings
- Common areas of blocks
- Specialised housing i.e. sheltered schemes

Where buildings and properties are managed by third parties e.g. (managing agents) the maintenance of the fixed electrical installations, appliances and Lightning Protection Systems (LPS) will fall under the scope of this policy so far as the where LBH retains specific responsibilities detailed in under the terms of the management agreement.

3. Objectives

Fixed electrical installations will be regularly tested and inspected, as they can deteriorate due to several factors such as damage, wear and tear, corrosion, excessive loading, aging and environmental issues.

There may also be instances of unauthorised electrical alterations carried out by or on behalf of the customer. Unsatisfactory electrical installations could lead to hazards such as fire and electrical shock. They should therefore be tested and inspected at regular intervals to check whether they remain in satisfactory condition for continued use. To manage risks from unsafe electrical installations and equipment, we will implement a periodic fixed electrical inspection regime, which results in the issuance of an Electrical Installation Condition Report (EICR).

London Borough of Harrow will comply with legal obligations regarding the completion of EICRs as outlined below:

- The frequency of testing will align with The British Standard and the Guidance Notes, which state that the maximum period between testing should not exceed 5 years and for domestic dwellings and should also be carried out at every change of occupancy.
- We will have robust processes in place to ensure that we keep accurate records of all electrical installations requiring testing, together with the last test date and next test due date.
- Where completion of an EICR requires access to a customer's home, we will have a formal access procedure in place. This procedure demonstrates that all reasonable and practical steps have been taken to complete the test.
- Upon completion of a fixed electrical installation test an EICR is produced as evidence of the inspection and to confirm that the installation is in satisfactory condition. The EICR should state the testing electrician's recommendation as to when the installation should be next inspected, up to an interval of no more than 5 years. They should make this decision based on their assessment of the overall condition of the electrical installation.

All Electrical testing and remedial works carried out on behalf of LBH will be carried out by suitably qualified and competent electricians.

We will ensure there are processes in place to verify that only appropriately qualified and accredited electricians and businesses are carrying out works to their properties. This will be supported by a framework of ongoing quality assurance and performance management arrangements.

In addition to managing the risk of fixed electrical installations we will also consider the risk from "portable" appliances such as white good and computer equipment. The IET Code of Practice for In-service Inspection and Testing of Electrical Equipment provides guidance on the approach to PAT.

Some buildings belonging to LBH will be installed with a LPS and where these are present there is a requirement for them to be maintained in accordance with BS EN 62305

4. Definitions

“We, Us, Our” – Refers to The London Borough of Harrow.

“You” – Refers to the service user or customer e.g. tenants and leaseholders.

Electrical Installation Condition Report (EICR) – A formal document produced following a periodic electrical inspection which evidences the condition of the electrical installation. Electrical Installation.

Electrical Installation Certificate (EIC) – A safety certificate issued to confirm that a new electrical installation or addition is safe to use at the time it was put into service. National Inspection Council Electrical Installation.

National Inspection Council for Electrical Installation Contracting (NICEIC) – A voluntary body that regulates the training and works of electrical contractors and organisations across the UK.

Lightning Protection Systems (LPS) – A system of external earthing and internal surge protection designed to prevent lightning strike damage to buildings.

Periodic Electrical Inspection – A detailed inspection of an existing electrical installation, to assess compliance with the latest national electrical safety standards.

Portable Appliance Testing (PAT) – The process of checking electrical appliances for safety through a series of visual inspections and electronic tests.

5. Commitments

These actions and measures demonstrate LBH’s commitment to maintaining a safe environment for both customers and staff whilst ensuring compliance with British Standards industry guidance. The Electrical Safety Policy will be supported by a formal Electrical Safety Procedure.

Access procedure

Access to properties for the completion of an EICR will be managed in line with a documented access procedure. Access attempts will start aims to make the first contact at least 8 weeks before the EICR expiry date to ensure that all reasonable and practical efforts have been made to complete the test before the expiration date. A full and detailed audit trail is maintained by London Borough of Harrow’s M&E team.

Access-attempts will include phone calls followed by written letters and in-person visits by contractors, Housing and Resident Liaison Officers. The procedure will allow sufficient flexibility to accommodate customer requests and circumstances. The

access procedure will largely mirror the gas access. If required, we will consider taking legal action to facilitate access to ensure the safety of the tenant, their families and their neighbours.

It is important that residents are informed as to why the electrical safety inspection is required – principally for the safety of the residents, their families and neighbours.

For those buildings where an EICR is required to be carried out to the electrical installation within the communal areas, access is not required to individual properties however orders will be issued to contractor to allow sufficient time for the completion of the EICR ahead of the certificate expiry date, with support from the Mechanical and Electrical Team and on-site staff to ensure access is gained to all necessary areas.

Defects

Where a test deems that the electrical installation is not satisfactory a timely action will be taken to bring the installation up to a satisfactory standard. Every effort will be made to ensure all necessary work is completed before the current EICR expiry date. Electricians will classify defects into three urgency levels, and we will instruct contractors to manage defects as per below:

- **Classification code C1: Danger present / Risk of injury** - Immediate remedial action will be undertaken to rectify the defect at the time of the inspection. If it is not possible for the electrician to complete the work and deem the electrical installation to be in a safe condition, the electrician should seek to isolate the parts of any circuit which is deemed unsafe and report the findings to Harrow immediately.
- **Classification code C2 - Potentially dangerous** - Urgent remedial action will be undertaken. Where possible this will be done at the time of the inspection however, if this is not possible the contractor should ensure the work is completed within 7 days
- **Classification code C3 - Improvement required** - These pose no risk to the electrical installation but are improvements that could be made to bring the installation in line with current standards. We will specify certain code 3 faults that the contractor will address within 20 days of the test, all others will be considered as part of future electrical upgrade programmes. Where any further works are required by the contractor to address code 1, 2 or 3 faults these will be carried out before the EICR is issued to Harrow, so that the EICR issued states the installation to be 'Satisfactory'.
- **Classification code FI – Further investigation required without delay** - This is used when the engineer suspects there might be defect or non-compliance, but additional testing, inspection or testing is required to confirm.

Smoke, heat and CO alarm

At the same time as the undertaking of the EICR, we will ensure that a check is made of any installed Smoke, Heat and Carbon Monoxide (CO) alarms.

The electrician will test that each appliance is sounding and working in line with manufacturer's instructions and industry best practise. The engineer will replace any existing defective alarms with a battery-operated replacement. In line with Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022. We will ensure all properties have an installed smoke alarm on every habitable floor, and where there are fixed gas appliances, a CO alarm compliant with BS EN 50292:2023.

[Portable appliance testing](#)

The Electricity at Work Regulations 1989 require that any electrical equipment that has the potential to cause injury is maintained in a safe condition.

London Borough of Harrow is not responsible for the maintenance of electrical appliances unless the appliance has been supplied by us. For example, we are not responsible for appliances within homes that have been purchased by the resident.

We do however have a responsibility for electrical appliances issued or used by staff, e.g. laptops, monitors, mobile phone charges and electrical appliances within communal areas that may be used by staff or customers, e.g. audio equipment and white goods such as kettles and microwaves. There may also be instances where appliances have been supplied within domestic dwellings, e.g. integral white goods installed in a new development where we retain responsibility.

Where LBH is responsible for electrical appliances, a PAT will be carried out by a competent person in line with IET Code of Practice for In-service Inspection and Testing of Electrical Equipment guidance.

The frequency of testing should be determined based on a risk assessment which considers how often equipment is used, who is using it and the environment it is used in.

London Borough of Harrow carries out a PAT on all applicable appliances either annually or bi-annually. This is subject to review and Harrow will adopt a risk-based approach based on evidence at regular intervals.

[Emergency lighting](#)

All of Harrow's residential buildings will be fitted with emergency lighting where required by relevant regulations, including the Regulatory Reform (Fire Safety) Order 2005 and the Building Regulations Approved Document B 2010 and BS 5266-1:2016 Emergency lighting, the Code of Practice for the emergency lighting of premises.

All testing and inspection to the lighting will be conducted by competent people in line with current guidance and manufacturers' guidelines. Any remediation required following inspections, will be conducted in a timely way by a contractor competent to work on emergency lighting. Records will be kept on a logbook system at each property.

This testing will be conducted as recommended by the manufacturer, and as a minimum monthly "flick" type test, with a full service annually.

Lightning Protection Systems

Where Lightning Protection Systems (LPS) are installed in buildings for which Harrow has a maintenance and repair responsibilities, an annual safety inspection will be carried out by a competent contractor in accordance with BS EN 62305. Most LBH buildings with LPS will have had the system installed as part of the build, having given consideration to the size and height of the building and the environment, e.g. frequency of lightning strikes in the area. In some cases, we may be required to install an LPS in an existing building following a Fire Risk Assessment. This will be undertaken where required. All inspections will typically be undertaken at least annually, with more frequent inspections where detailed by the risk assessment.

Asset data reconciliation

London Borough of Harrow will ensure a valid certification is in place for all fixed electrical installations, emergency lighting and portable appliances in all buildings and properties for which it has a defined maintenance and repair responsibility.

We will maintain data and keep accurate records within the C365 – online Compliance Database – of all buildings and properties that require an EICR and LPS safety inspection, together with the last test, testing frequency (as recommended by the last testing engineer) and the next due date.

Processes are in place to ensure testing schedules are updated to reflect any property divestments, acquisitions (including new builds) and any changes to maintenance and repair responsibilities. In addition, on an annual basis a full EICR property reconciliation will be carried out. This will reconcile the information within C365 to ensure all applicable building and properties remain captured in the EICR schedule. As part of this reconciliation process.

We will ensure that where the responsibility for electrical safety to a third party (e.g. Managing Agent) action is taken to ensure evidence is obtained that all necessary electrical tests have been undertaken and appropriate records saved as appropriate to demonstrate compliance.

Certification and documentation

Upon completion of an inspection and test, the contractor will upload the EICR or LPS certificate to C365. The date on the certificate will be recorded then used to generate the next inspection date based on appropriate frequency i.e. 5 years for EICRs. For EICRs the next test due date will be as per the testing electrician's stated recommendation on the EICR as to when the installation should be next inspected, up to an interval of no more than 5 years.

In addition to the scheduled regime, an EICR will be completed as part of the void works before any property is re-let. The contractor carrying out the test will upload a copy of the EICR to C365.

If any properties require adding to the testing schedule, evidence of a current valid EICR or in the case of new developments an Electrical Installation Certificate (EIC), will be obtained. Harrow will only accept EICRs that are stated as "Satisfactory". If a

test is carried out and defects deem the installation to be “Unsatisfactory” all necessary remedial works will be carried out before the EICR is issued to LBH so that the EICR issued states, the installation to be Satisfactory.

London Borough of Harrow will not accept “Unsatisfactory” EICRs supported by a minor works certificate. In the case of an EIC, these will be accepted as an inspection record if either the full installation has been replaced or if only a partial replacement has taken place, all remaining elements of the installation have been tested. Before issue to LBH, all EICRs (and EICs) must be reviewed and signed by the contractors Electrical Qualifying Supervisor. For added assurance a percentage desktop audit will also be carried by the Compliance Contract Manager.

All EICRs (and EICs) and LPS safety certificates will be saved against the property/building within C365.

[Contractor competence, quality control and performance](#)

London Borough of Harrow will ensure that all those carrying out electrical testing within its buildings and properties are competent to do so. All contractors procured to undertake electrical testing must be accredited with The National Inspection Council Electrical Installation Contractors (NICEIC). The electricians undertaking the testing on behalf of the London Borough of Harrow will as a minimum hold the following qualifications:

- NVQ level 3 Electrical Installation or recognised equivalent
- City & Guilds 2382-22 Level 3 Award in Requirements for Electrical Installations BS7671:2018+A2:2022
- City & Guilds 2391-52 Level 3 Award in Inspection, Testing & Certification of Electrical Installations

The Mechanical and Electrical Team will maintain a register of all electrical contractors and electricians carrying out testing works on behalf of LBH. This will include the specific qualifications of the electricians and if applicable the expiration date. Processes will be in place to ensure that the register is kept up to date, e.g. new electricians are added, and that evidence is obtained of any renewed/updated qualifications. Contract managers will oversee electrical testing contractors using performance metrics and KPI dashboards.

Monthly operational meetings are held with contractors within which performance is discussed and documented, with procedures in place to take more formal action to address performance issues if required.

To support performance management and to provide assurance on the quality and safety of work, we have employed a Quality Assurance consultant to carry out a percentage audit of completed EICRs. The Quality Assessors provides technical and corrective advice as well as monthly reporting and trend analysis to LBH regarding the performance of the contractor and its electricians. We commission a 5% assurance check, with the opportunity to increase if the factual evidence points towards a lack of reputable workmanship being undertaken.

6. Roles and responsibilities

The roles and responsibilities for key stakeholders is detailed below. (Note these are the roles and responsibilities specifically related to the delivery of this policy only). The Electrical Safety Procedure will provide further details on the roles and responsibilities of all staff with day-to-day responsibility for electrical safety.

The Managing Director of Paid Services as the Duty Holder - Must ensure that adequate resources are made available to allow the actions and measures detailed in this policy and any associated procedures to be effectively delivered. They will discharge their responsibilities for the for the delivery of services in line with policy and procedures to the Director of Housing, however, will retain an oversight on progress/performance.

Director of Housing – Will oversee the overall implementation and regular review of this policy, ensuring its objectives are achieved. They are also responsible for compliance performance reporting to the Managing Director of Paid Service.

Mechanical and Electrical Manager - Is the deputy responsible person for the day-to-day operational delivery of all electrical testing. They will effectively manage the performance of the service delivery contractors, including their ongoing competence, and proactively monitor service delivery against targets. They will ensure Housing staff's adherence to the access procedure, ensuring appropriate and timely action is taken to secure access to properties, ultimately maximising the number of properties accessed, ahead of EICR expiry date. They will be responsible for monitoring the quality of work undertaken by the contractor and ensuring all certification is received and verified. They will act as the organisations' technical lead for electrical safety, ensuring that we continue to work in line with the most up to date regulations and industry guidance.

7. Legislation and regulations

London Borough of Harrow is committed to complying with all statutory duties for installation of repairs and maintenance including, but not limited to:

- Health and Safety at Work etc. Act 1974
- Defective Premises Act 1972
- Landlord and Tenant Act 1985, Sections 8 & 11
- The Management of Health and Safety at Work Regulations 1999
- Electricity at Work Regulations 1989
- Electrical Safety: Approved Document P
- Electrical Equipment (Safety) Regulations 2016
- The Building Regulations 2010
- The IET Wiring Regulations (18th Edition, Amendment 2) BS 7671:2018 + A2:2022
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

- BS 5839-1: 2017 Fire detection and alarm systems for buildings - Code of practice for fire detection and fire alarm system design, installation, commissioning and maintenance of systems in non-domestic premises
- BS 6651:1999 Code of Practice for protection of structures against lightning or BS EN 62305 Protection against lightning (depending on when the system was installed)
- BS 5266-1:2016 Emergency lighting - Code of practice for the emergency lighting of premises
- HSE GS38: Electrical Test Equipment for Use by Electricians
- HSE INDG236: Maintaining portable electric equipment in offices and other low-risk environments
- HSE INDG354: Safety in electrical testing at work and Electrical inspection and testing.
- HSE HSR25: 'The Electricity at Work Regulations 1989: Guidance'
- HSENI publish guidance on electrical safety
- BS EN 50292:2023 – Electrical apparatus for the detection of carbon monoxide in domestic premises, caravans and boats.
- BS EN 62305 – Protection against lightning

Risk Management

The risk of not following this policy is that LBH will not comply with industry guidance and will fail to appropriately maintain electrical installations, leading to a potentially detrimental impact on the safety of customers and staff. This may result in (amongst other things):

- Risk of serious harm to residents and other users of the London Borough of Harrow's buildings.
- Prosecution by the Health and Safety Executive under the Health and Safety at Work etc. Act 1974.
- Prosecution by the Local Authority under the Housing Act 2004.
- Prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007.
- Enforcement by the Regulator of Social Housing for breach of the Consumer Standards, as per the Social Housing Regulation act 2023.
- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

8. Data protection, record storage and retention

All completed EICRs and EICs will be stored at a property or building specific level within C365. EICRs and EICs will be retained for at least 10 years. Certification will include the full property address. Access to C365 is login restricted. A full audit trail of all EICR access attempts will be held in Cx, including details of communication with the contractors and customers etc. Access to Cx is login restricted.

9. Performance management

The completion of EICRs in communal areas, in line with their due date, forms part of the "Health & Safety – Customers' Homes" balanced scorecard KPI. This is reported monthly to the Housing Senior Management Team (HSMT) and progress on the domestic EICR programme is also presented monthly to the Director of Housing and Heads of Service.

10. Review

This policy will be reviewed every two years, or sooner if required by statutory or regulatory changes, best practices, emerging developments, or circumstances arising from reviews of other group-wide policies. The policy will be reviewed by the Building Safety & Compliance Manager.

11. Equality and diversity

This policy will be applied in a way which ensures equality of treatment for all customers, without discrimination or victimisation on account of any protected characteristic as defined in the Equality Act 2010. In drafting this policy Harrow has had regard to its public sector equality duties under s149 of the Equality Act 2010, namely the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The policy takes into account diverse needs regarding access to and delivery of any services. On request, Harrow will provide translations of all its documents, policies and procedures in various languages.