



Electrical Safety Management Plan

(Supporting the Electrical Safety Policy)

If you have difficulty with reading this management plan, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Our Vision, Our Values, Our Strategic Objectives

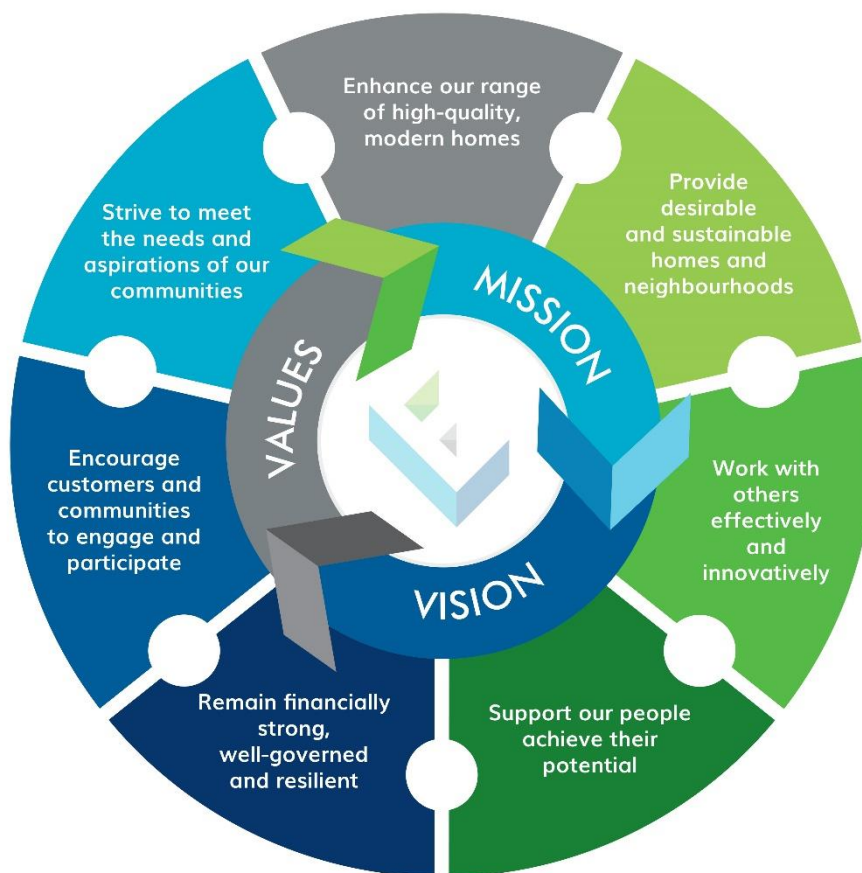
Our Vision

A vibrant neighbourhood where everyone can prosper.

Our Values

Caring, Reliable, Fair, Open and Adaptable

Our Strategic Objectives



Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Management Plan and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Management Plan.

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1. Introduction and Link to Electrical Safety Policy

- 1.1 Elderpark Housing has a statutory duty as an employer, a landlord and registered provider of social housing to ensure the health, safety and wellbeing of its employees, customers and “other” stakeholders in respect of managing electrical safety within its properties and workplaces (this can include contractors, visitors and members of the public).
- 1.2 This management plan should be read in conjunction with the Electrical Safety Policy which defines our overall approach to managing electrical safety within our relevant properties to the required legislation. The Policy defines the scope in terms of relevant properties, work streams and people to whom it applies.
- 1.3 This management plan underpins the Electrical Safety Policy and contains additional detail of the management arrangements we have in place, to enable Elderpark Housing to comply with all Legislation and standards relating to electrical safety and the policy.
- 1.4 All Elderpark Housing staff who have any responsibility for the management of electrical safety across the organisation, will be required to have read and understood both this Electrical Safety Management Plan and the Electrical Safety Policy. They will need to ensure that all relevant staff within their team have read both documents.

2. Legal and Regulatory Framework

- 2.1 The Electrical Safety Policy sets out the Scottish Housing Regulators framework, including the 7 Regulatory standards and how they apply to Electrical safety within Elderpark Housing.
- 2.2 The Electrical Safety Policy explains the key legislation in place which Elderpark must comply with as an employer and registered landlord of social housing, which is listed below:
 - The Health & Safety at Work Act 1974
 - The Management of Health and Safety at Work Regulations 1999
 - The Housing (Scotland) Act 1987 (Tolerable Standard)
 - The Electricity at Work Regulations 1989
 - BS 7671:2018 Requirements for Electrical Installations, IEE Wiring Regulations 18th Edition
 - Guidance note 3 (inspection and testing)
 - The Electrical Equipment (Safety) Regulations 2016
 - The Scottish Social Housing Charter

2.3 In addition to these key pieces of legislation there are other associated regulations, standards and guidance which are applicable to Electrical safety, these are:

- Building Standards (Scotland) Regulations 2014
- Corporate Manslaughter and Corporate Homicide Act 2007.
- Scottish Government - Building Standards. Technical Handbook 2009 Domestic Environment
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013)
- The Workplace (Health, Safety & Welfare) Regulations 1992
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Provision and Use of Work Equipment Regulations 1998
- Construction, (Design and Management) Regulations 2015
- Personal Protective Equipment Regulations 1992
- The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE)
- INDG236: 'Maintaining portable electrical equipment in offices and other low risk environments'
- 'Landlords' Guide to Electrical Safety Scotland 2017'.
- HSR25 The Electricity at Work Regulations 1989, Guidance on the regulations.
- IET Guidance Notes 1-8
- Electricity at work – Safe working practices HSG85
- Keeping electrical switchgear safe HSG230
- Maintaining portable and transporting electrical equipment HSG107
- Avoiding dangers from underground services HSG47
- The IET Code of Practice for in service inspection and testing 2013

3. Roles and Responsibilities

3.1 The Electrical Safety Policy contains details of key roles and responsibilities associated with managing Electrical safety for Elderpark Housing.

4. Aims and Objectives of this Management Plan

4.1 The aim of this management plan is to support the Electrical Safety Policy in giving more detailed arrangements that Elderpark Housing will have in place to enable us to meet all legal and regulatory obligations and ensure best practice is followed in relation to Electrical safety. We aim to:

- Keep the general public, tenants, and employees aware of the risks associated with electrical installations and appliances and, as far as reasonably practical, ensure their health, safety and wellbeing in relation to Electrical safety.

- Set out a clear approach to assessing, controlling, and monitoring the risks associated with electrical installations and appliances within Elderpark's properties and office premises.
- Communicate with tenants and staff the importance of electrical safety including providing guidance, training and emergency procedures.
- Ensure that all procedures relating to the Electrical Safety Policy support the fair treatment of all tenants with respect to their different needs, circumstances, and lifestyle.

4.2 To meet our aims, we have set the following objectives to be achieved:

- We will carry out Electrical Inspection Condition Reports (EICRs) for all fixed electrical installations at suitable intervals as described herein and undertake the necessary work to remediate any C1\C2 deficiencies found in a reasonably practicable timescale to achieve a satisfactory report for each installation.
- Develop and maintain a register listing all properties with electrical installations that Elderpark are responsible for including date of the last EICR to enable these to be completed before the anniversary date within 5 years.
- Ensure all fixed electrical appliances and portable electrical appliances (PAT) owned and managed or issued by Elderpark are inspected maintained to a risk-based frequency by suitably competent person.
- Promptly repair or renew any defective part of an installation in accordance with priority repair timescales.
- Ensure any unauthorised and defective alterations or additions to electrical installations are rectified or removed on discovery.
- Only appoint competent electrical contractors registered with National Inspection Council for Electrical Installation Contracting (NICEIC) or the Electrical Contractors Association of Scotland (SELECT)
- Ensure that contracts with external contractors are managed effectively and robust contract monitoring is in place to monitor performance and promote continuous improvement.
- Identify an appropriate staff training programme to be implemented so that staff are aware of their responsibilities in relation to Electrical safety

- Respond to any amendments in the legislation and guidance with regards to Electrical safety to ensure that legislative standards are met
- Report regularly to the Management Committee of performance measures associated with electrical safety.
- Ensuring that all works in relation to Electrical safety meet current regulations and legislation and are carried out by reputable and qualified persons.
- Regularly inspecting our properties and their immediate environment to ensure they are free from risks which could increase the risk of fire including Electrical installations, and subject to regular inspection and renewal.
- Identifying, assessing, and managing any potential sources of risk.
- Communicating Electrical safety tips and information to the public via our website, social media, and written communication.
- Ensuring electrical equipment and devices provided for work use or to customers are subject to a suitable system of inspection and maintenance and are in good repair.

5. Electrical Asset Register

- 5.1 Elderpark will operate and maintain a robust electrical asset register containing all properties which contain an electrical supply, fixed wire installation and any other electrical asset components which require checking or maintaining.

Properties falling within scope of the Policy and Management Plan

- 5.2 We will maintain a record of all owned and managed properties which will be defined within the system as to whether the electrical safety checks and effective maintenance responsibilities belong to Elderpark or another party (e.g. where we are leasing the building from the freeholder). The list of properties to which the policy and management plan apply are listed below:

- Domestic properties with fixed wiring installations
- Communal landlord electrical supplies (common areas of buildings)
- Office (workplaces)
- Fixed electrical appliances and portable electrical appliances

Domestic Properties

- 5.3 As defined within the scope of the Electrical Safety Policy and detail within this management plan, we will ensure that all domestic properties with an electrical supply

and fixed wiring installation, where it is defined as our responsibility (where we are the freeholder) will be subject to an electrical safety check where an Electrical Installation Condition Report will be produced (EICR).

- 5.4 Where we are not the freeholder (for example we are leasing a building from another organisation) we will understand who has the responsibility for electrical safety on an individual basis and ensure the asset register reflects this responsibility. Where the responsibility lies with another organisation (e.g. they are the freeholder or with a managing agent) we will ensure we obtain copies of the new valid satisfactory EICR before the expiry of the previous certificate.

Communal Properties (Landlords Supply)

- 5.5 It is only a requirement under the Scottish Housing Quality Standard (SHQS) to carry out domestic EICR's every 5 years by a competent electrician and a copy to be given to the tenant, but there is no current requirement to carry out communal EICR's to commercial premises (e.g. offices) or communal parts of domestic dwellings where there is a landlord supply.
- 5.6 However, Elderpark have a duty under the Health and Safety at Work Act 1974 to ensure the safety of employees and others (customers, contractors, visitors and members of the public) to ensure their health and safety (so far as is reasonably practicable. We also have duties under the Management of Health and Safety at Work Regulations 1999 to risk assess and apply appropriate controls to mitigate risks, and we also have duties outlined within the fire safety policy to maintain safe escape routes and access for attending fire fighters. Due to these duties listed above, we will carry out an EICR to all communal areas where there is an electrical supply and to all commercial buildings where appropriate.
- 5.7 Where we are not the freeholder (for example we are leasing a building from another organisation) we will understand who has the responsibility for electrical safety on an individual basis and ensure the asset register reflects this responsibility. Where the responsibility lies with another organisation (e.g. they are the freeholder or with a managing agent) we will ensure we obtain copies of the new valid satisfactory EICR before the expiry of the previous certificate.

Offices

- 5.8 As defined within the scope of the Electrical Safety Policy and detail within this management plan, we will ensure that all Offices (Any buildings used as a place of work) with an electrical supply and fixed wiring installation, where it is defined as our responsibility (where we are the freeholder) will be subject to an electrical safety check where an Electrical Installation Condition Report will be produced (EICR).
- 5.9 Where we are not the freeholder (for example we are leasing a building from another organisation) we will understand who has the responsibility for electrical safety on an

individual basis and ensure the asset register reflects this responsibility. Where the responsibility lies with another organisation (e.g. they are the freeholder or with a managing agent) we will ensure we obtain copies of the new valid satisfactory EICR before the expiry of the previous certificate.

Updating the electrical asset database

5.10 Within this database we will record details of all electrical installations and components that are within the properties, such as consumer units and electrical heating.

5.11 The database containing all electrical assets will be updated in all of the following circumstances:

- When a property acquisition or disposal takes place
- When a new electrical system, component or fixed electrical installation is installed.
- When any changes are made or identified as part of the programme of EICR's
- When a void EICR takes place.
- When any changes are made or identified or components or full replacement is made during capital investment works e.g. full rewire.

6. Electrical Safety Inspection and Testing - EICR Programme

6.1 Elderpark aims to ensure that its electrical installations should have:

- sufficient sockets for the number of portable appliances likely to be used, in order to minimise the use of multi-socket adapters
 - covers in place to ensure that fingers cannot come in contact with live parts
 - residual current device (RCD) protection where appropriate
 - satisfactory earthing arrangements
 - satisfactory bonding arrangements
 - enough circuits to avoid danger and minimise inconvenience in the event of a fault
- cables that are correctly selected in relation to their associated fuse or circuit-breaker

6.2 To determine if an electrical installation is safe and free from significant faults the association shall commission a suitably qualified electrical contractor to carry out an Electrical Inspection Condition Report (EICR) to each domestic property.

6.3 An EICR is an Electrical Installation Condition Report (previously known as PIR – Periodic Inspection Report). EICR's are the main types of reports completed following an electrical safety check.

Domestic EICR Programme

- 6.4 The EICR domestic programme of testing and inspections will be developed, informed by the date shown on the most recent Electrical Installation Condition Report and/or installation certificate as determined by information held on our system.
- 6.5 This programme will be amended as a consequence of any properties having an electrical installation carried out and having a new satisfactory EICR produced, or as a consequence of there being a change in tenancy and a new satisfactory EICR is completed.

Domestic EICR Frequency

- 6.6 All applicable properties (stated in 7.1), will be subject to an electrical safety check every 5 years or sooner in line with Guidance Note 3 from BS7671 which states a maximum of 5 years for rented property. The 5-year frequency is also prescribed by the Scottish Housing Quality Standard (SHQS)
- 6.7 There are certain circumstances where Elderpark may complete the electrical safety check sooner than the maximum 5 years for example when other electrical works are being carried out, e.g. a new kitchen being installed, or when the property becomes void at the change of occupancy before a new customer moves in.
- 6.8 When a qualified electrician identifies the need for a safety check to be completed sooner than the 5 years, this should be clearly marked on the EICR and will normally have a reason for example due to the deterioration of the system or ongoing vandalism to the electrical system causing faults etc.
- 6.9 Elderpark will comply with the 5 years recommended in Guidance Note 3, therefore we will ensure all properties for which we are responsible will have a new valid, in date satisfactory EICR in place before the next 5-year anniversary. We will deem any properties without a valid in date satisfactory EICR as non-compliant until this is completed.

Void properties (changes of tenancy) and mutual exchanges

- 6.10 A full Electrical Installation Condition Report shall be undertaken when any domestic property becomes void, or where there is a change of tenancy or a mutual exchange before the new customer moves into the property.

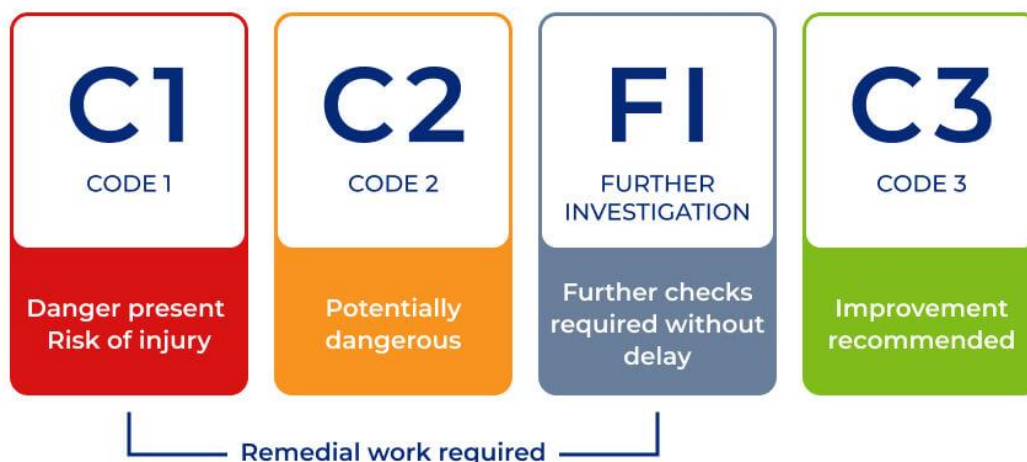
7. Completion of C1 and C2 Defects and FI and C3 Observations

- 7.1 There are two outcomes for the electrical safety inspection. These are:

- The EICR is **Satisfactory**. This means that the electrical system requires no additional or follow-on works and that there is no recommendation for an electrical re-wire. A Satisfactory report may have “C3” observations where improvement is recommended.
- The EICR is **Unsatisfactory**. This means that the electrical system / condition report that has at least one outstanding action(s), has had a C1, C2 or FI raised against the system, or that there is a recommendation for a rewire.

7.2 When an EICR is completed by the competent electrician, any identified issues or defects are included within the observations section of the EICR report. Codes are utilised to determine the danger level of the observation and will determine the outcome of the EICR; such observations need rectifying based on the standard classification categories:

- **Code 1 (C1)** is described as ‘**Danger present. Risk of injury. Immediate remedial action required.**’ Code C1 represents an immediate threat to the safety of employees, customers or guests and should be rectified or made safe as soon as possible.
- **Code 2 (C2)** is described as ‘**Potentially dangerous – urgent remedial action required.**’ Code C2 is not as severe as C1 but is still a potentially dangerous defect. They may not pose an immediate threat but are likely to become a danger in the future.
- **Code FI** is described as ‘**Further Investigation required without delay**’. Code FI means that the electrical testing engineer has observed something whilst carrying out the testing which may not have been covered in the report, so they have noted it separately as code FI.
- **Codes C1 and C2** result in an **unsatisfactory** EICR report rating and these defects must be rectified in order to demonstrate compliance. A report could also be classed as **unsatisfactory** if the only fault codes are FI.



- **Code 3 (C3)** is described as ‘Improvement recommended.’ A code C3 is to be used to indicate that certain items have been identified as not complying with the requirements of the current issue of BS 7671, but that the users of the installation are not in any immediate or potential danger as a result. Careful consideration should be given to the safety benefits of improving those aspects of the installation. A code C3, in itself, should not warrant an overall unsatisfactory report.

Achieving a Satisfactory EICR

- 7.3 Repairs and minor works resulting from observations made during the inspections, should be completed to achieve a ‘satisfactory’ EICR and confirm that the installation is safe. Elderpark will only accept in date, valid and satisfactory EICR’s whereby all C1 and C2 observations have been completed. There is an exception to this rule however which is accepted by Elderpark and is widely accepted and endorsed within the electrical industry.
- 7.4 It is acceptable for certificates that have been deemed “unsatisfactory” through C1 or C2 observations, to have an appended Electrical Installation Certificate (EIC) or minor works completed, and if all observations listed have been rectified, that unsatisfactory certificate appended with either of those documents, can be classed as a valid certificate. Consideration should be given on how these documents are stored and retrieved together to ensure that these certificates are not mistaken as invalid or thought to still having outstanding remedial works, when they have been completed.

8. Tenants Responsibilities

- 8.1 It is the tenant’s responsibility to allow the association to undertake these fixed installation inspections and testing, and in doing so they should be made aware that it is necessary to temporarily de-energise the electrical supply to the property.
- 8.2 All tenants’ properties where Electrical Inspection and Testing is to be carried out, shall be informed in writing that the electrical installation will require temporary de-energising, and that the Association accepts no responsibility for any loss or damage resulting from this.
- 8.3 Accordingly, the tenant should:
- Identify any requirement to save IT software and action this before the start of any electrical operations
 - Make their own contingency arrangements for the absence of electrical supplies e.g. to freezers/ fridges
 - Make sure appropriate access and relocation/removal of any obstacles has been done before the contractor arrives.

In some circumstances the association may be in a position to assist tenants with moving items to enable the EICR to be carried out.

- 8.4 Elderpark Housing Association is not responsible for the safety of residents' cookers, or fixed or portable electrical appliances not provided by the Association; or installations which have been installed without our prior approval.
- 8.5 If any installation has been undertaken without our permission and is found to be defective at the EICR inspection, the contractor will terminate the supply and make recommendations for the required rectification works.
- 8.6 Tenants are responsible for the cost of any repairs relating to damage they have caused with faulty self-installed appliances and wiring.
- 8.7 Under the terms of the Scottish Secure Tenancy Agreement Section 5 tenants must allow access to their property to carry out maintenance or safety checks.
- 8.8 Tenants are responsible for portable appliances that they own.
- 8.9 The Association will recommend to outgoing residents doing a mutual exchange that they should not gift any appliances to the next resident without a Portable appliance testing test (commonly known as a PAT test).
- 8.10 In the event of continued no access for carry out the EICR tests or remedial works to make the electric installation safe, tenants should be aware that failure to provide access is a breach of their Scottish Secure Tenancy Agreement under Section 5.12 that states: If you refuse us entry, we will have the right to make forcible entry provided we have given you every reasonable opportunity to let us in voluntarily. If we have to make forcible entry, in this situation, you are liable for the costs of any damage reasonably caused.

9. Record Keeping

- 9.1 All EICRs shall be held in electronic format, centrally stored, logged to the Register and linked to the relevant property record by unique property reference number (UPRN).
- 9.2 To ensure that any non-compliant situations are recorded, an EICR tracker will also be in place that shall note any un-satisfactory C1 and C2's recorded on the EICR and shall also track the remedial works, noting date of completion that removes the potential dangerous or Danger Present non-compliant situations.
- 9.3 Remedial works carried out to remedy any un-satisfactory situations (C1/C2), should be linked to the original EICR to show compliance. In some circumstances these works may be included in a minor works certificate
- 9.4 The tracker shall also provide the anniversary date for the properties next EICR test.

9.5 Elderpark will carry out a 10% inspection of EICR certificates for compliance as well as conduct 10% post inspections of remedial works carried out. These inspections shall be carried out by a competent person who is qualified and has the necessary experience to inspect and evaluate the certificates/works.

10. Performance and Assurance

10.1 Section 9 of the Electrical Safety Policy contains details relating to the implementation of the policy and what levels of Governance and oversight we have in place. Section 10 of the Electrical Safety Policy contains information of who is responsible for providing operational assurance information and how this will be reported.

10.2 In addition to those two sections of the policy we will ensure that the Management Committee will receive regular updates on the implementation of the Electrical Safety Policy and any Electrical Safety Reviews so that they can have assurance that it is operating effectively.

10.3 Performance and compliance shall be reported by the Governance and Compliance Manager at quarterly Management Committee meetings and shall include the following:

- No. of domestic properties requiring a 5 yearly EICR with a valid satisfactory in date EICR in place
- No. of non-domestic properties requiring a 5 yearly EICR with a valid satisfactory in date EICR in place

10.4 Performance and compliance shall be reported by the Governance and Compliance Manager at quarterly Management Committee meetings.

11. Review

11.1 This management plan will be reviewed periodically and when changes in legislation, good practice or operational occur, which may affect the content of this document.

Appendix 1 – Glossary of terms

EICR	Electrical Installation Condition Report.
PAT	Portable Appliance Testing.
NICEIC	National Inspection Council for Electrical Installation Contracting.
IET	Institution of Engineering and Technology
BS 7671:2018	IET Wiring Regulations Eighteen Edition.
GN3	IET Guidance Note 3 Inspection & Testing.
C1	Danger Present, risk of injury, immediate action required.
C2	Potentially dangerous- urgent remedial action.
C3	Improvement required.
FI	Further investigation required without delay.