

Electrical Safety Policy

Issue details	
Title:	Electrical Safety policy
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Policy owner:	Compliance Manager
Policy sponsor:	Corporate Lead for Property and Assets
Authorisation by:	
Authorisation date:	
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Delegated authority to make changes to the policy:	Assistant Director Housing (Regulatory Services)

1. Purpose of Policy

The electrical safety policy details how East Devon District Council (EDDC) meet the requirements for electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. In addition to this the policy provides assurance that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with electrical installations and electrical portable appliances.

The policy is relevant to tenants, contractors and other persons 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 EDDC to maintain a safe environment for tenants and employees within the home of each tenant and within all non-domestic (communal) premises or areas of buildings. EDDC will follow a systematic approach to the management of electrical work to ensure it meets the requirements set out in BS 7671 2018 Requirements for Electrical Installations IET Wiring Regulations 18th edition including all amendments and other relevant legislation relating to electrical safety. This is to ensure the safety of tenants, employees and members of the public.

2. Scope

EDDC acknowledges and accepts its responsibilities regarding electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. The Landlord and Tenant Act 1985 places duties on landlords to ensure that electrical installations in rented properties are:

- Safe when a tenancy begins
- Maintained in a safe condition throughout the tenancy

To be compliant under these duties electrical installations are required to be periodically inspected and tested within 5 years under the new legislation detailed in Electrical Safety Standards in the Private Rented Sector (England) (Amendment) (Extension to the Social Rented Sector) Regulations 2025

3. Definitions

- **EICR (Electrical Installation Condition Report):** A formal document produced following an assessment of the electrical installation within a property, confirming whether it is safe for continued use.
- **PAT (Portable Appliance Testing):** The process of periodically inspecting and testing electrical portable appliances to ensure they are safe to use.
- **C1 Defect:** A code used in electrical inspection indicating “Danger present. Risk of injury.” Requires immediate action to make safe.
- **C2 Defect:** A code indicating “Potentially dangerous.” Requires urgent remedial action and risk assessment.
- **C3 Defect:** A code indicating “Improvement recommended.” Remedial work is not required for the report to be deemed satisfactory.
- **NICEIC:** National Inspection Council for Electrical Installation Contracting – a regulatory body for electrical contractors.
- **No Access Policy:** The Council’s process for gaining access to properties where tenants refuse entry for safety inspections or repairs.
- **Competent Person Scheme:** A government-approved scheme allowing individuals and enterprises to self-certify that their work complies with building regulations.
- **HHSRS (Housing Health and Safety Rating System):** A risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from deficiencies identified in dwellings.

4. Policy Details

Policy Objectives

The objectives of the policy include:

- Protect the health, safety and wellbeing of customers.
- Ensure compliance with relevant legislation.
- Prioritise resources to address defects and hazards having the greatest risk on customer health, safety and wellbeing.

- Provide a transparent, consistent and accountable repairs service.
- Allow for timely and consistent communications to enable customers to be kept informed.
- Deliver value for money. This includes, where possible, delivering planned works programme over more expensive responsive repairs.

Policy Principles

Detailed below are the key policy principles relating to electrical safety:

- East Devon District Council will hold accurate records against each property it owns or manages identifying when the electrical installation was last inspected and tested and all electrical portable appliances that is held at each property together with details of Portable Appliance Tests (PATs) undertaken.
- East Devon District Council will ensure that all domestic properties owned or managed have a valid Electrical Installation Condition Report (EICR) that is no older than 5 years from the date of the previous EICR. East Devon District Council will deliver a comprehensive programme of testing and inspection of all domestic properties on a rolling 5-year cycle.
- East Devon District Council will ensure that all non-domestic (communal) properties and offices owned or managed have a valid Electrical Installation Condition Report (EICR) that is no older than 5 years from the date of the previous EICR. East Devon District Council will deliver a comprehensive programme of testing and inspections of all non-domestic (communal) properties and offices on a rolling 5-year cycle.
- East Devon District Council will ensure that all electrical installations shall be in a satisfactory condition following completion of an electrical installation inspection and test where possible. Where a test is unsatisfactory and a C1 defect is identified, the electrician **must make safe immediately** before leaving the property similarly where a C2 item is identified it must be risk-assessed on site and made safe. Where time constraints during the test prevent completion, the electrician shall still **make safe**
- East Devon District Council will ensure that electrical installation inspection and tests are carried out prior to the commencement of any new tenancies (void properties), mutual exchanges and transfers and that a satisfactory EICR is issued to the tenant prior to them moving in.
- East Devon District Council will ensure that only suitably competent NICEIC electrical contractors and engineers undertake electrical works.

This policy recognises the Housing Health and Safety Rating System (HHSRS) as a critical framework for assessing and managing hazards in residential properties, including electrical safety. In line with HHSRS and the Repairs Policy, the Council identifies electrical hazards as a priority area of risk, ensuring that all electrical installations, wiring, and appliances are maintained in a condition that protects residents from harm. Our approach to electrical compliance supports our duty to prevent hazards associated with electrical faults, fire, or shock, and to create homes that are safe, healthy, and free from avoidable risks—as set out in HHSRS guidance. By explicitly referencing HHSRS within our electrical safety policy, we demonstrate our commitment to meeting statutory and regulatory requirements, and to maintaining the highest standard of safety in all our housing stock.

The Council is committed to providing an inclusive electrical safety service that recognises and meets the needs of all residents, including those who are vulnerable or disabled. We ensure that access arrangements for inspections, testing, and remedial works are adjusted to accommodate individual circumstances, such as mobility limitations or communication requirements. Where necessary, alternative formats or additional support will be provided to enable full understanding and cooperation.

Issuing of Reports

Following each inspection, a copy of the Electrical Installation Condition Report (EICR) will be provided to the tenant(s) of the property within 28 calendar days of the inspection's completion. For new tenancies, the EICR will be issued prior to the commencement of the tenancy.

Remedial Works

Where remedial works are identified in the EICR, ie C1 and C2. These works will be completed within 28 days of the inspection, or sooner if required to ensure the safety of occupants.

Commitment to Safety

This Policy reflects East Devon District Council's ongoing commitment to maintaining safe homes and ensuring compliance with all relevant housing and electrical safety regulations.

PAT Testing

East Devon District Council will ensure that all electrical portable appliances are tested periodically in accordance with the testing guidance set out in The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE).

Scope of PAT Testing

The PAT testing cycle applies exclusively to electrical portable appliances located in community centres/hubs and Houses in Multiple Occupation (HMOs) managed or regulated by the Council.

In community centres and hubs, all portable appliances used by staff, volunteers, or the public will be subject to regular inspection and testing. The frequency of testing will be based on the type of equipment, its usage, and the environment in which it operates, in line with ISITEE recommendations.

In HMOs, PAT testing will be carried out on all landlord-provided portable appliances as part of the Council's licensing and compliance responsibilities. Testing intervals will be determined by risk assessment and legal requirements under the Housing Act 2004 and associated regulations. No routine PAT testing cycle is applied to other council-owned or managed properties unless specifically required by risk assessment or statutory obligation.

4.1 Additional Testing

East Devon District Council will carry out electrical installation inspection and tests and issue new satisfactory EICRs when completing planned component replacement works within domestic properties. In the case of a rewire East Devon District Council will receive an installation certificate and following minor works, a minor works certificate.

East Devon District Council will test and replace as necessary smoke alarms, heat detectors and carbon monoxide detectors which are not covered as part of the annual gas safety check visit (i.e. the property does not have gas), as part of the 5-yearly electrical inspection and testing visit.

East Devon District Council will ensure that robust processes and controls are in place to manage the completion of follow up works identified during inspection and testing of electrical installations and electrical portable appliances. East Devon District Council will ensure that robust processes and controls are in place to ensure that all electrical works are properly notified and approved under Part P of the Building Regulations for England and Wales where this is required.

East Devon District Council will ensure that robust processes and controls are in place to manage works to void and occupied properties that may affect existing electrical installations.

4.2 No Access

East Devon District Council will have a robust process in place to gain access to properties where tenants refuse access to ensure tenant safety and to ensure East Devon District Council fulfil their duty as a landlord. This detailed in our No Access Policy.

4.3 EICR Testing

East Devon District Council will write to advise tenants that their property is included in the testing programme for that forthcoming year & that a named contractor has been appointed to carry out the work.

Our appointed Electrical Contractor will call &/or write to the tenant advising them of when they will be attending to carry out the electrical test.

If the tenant is not home at the time of the test or the tenant refuses access our Electrical Contractor will make a further attempt to book an appointment with the tenant, this will be by telephone and/or letter.

Should the tenant refuse access, fail to make a suitable appointment or make an appointment (which is not kept), for whatever reason, the Electrical Contractor will refer this back to the Council for their pursuance.

An appropriate Officer will attempt to make contact with the tenant to arrange an appointment to carry out the electrical test (EICR). If they are unable to do so, the Officer will serve the tenant with a final warning letter stating that the tenant must arrange an appointment with the Council's appointed Electrical Contractor within the next 7 days.

Should the tenant fail to make contact within the designated time (7-day period), a 7-day legal letter will be served advising the tenant that the Council's appointed Electrical Contractor will be attending on a specific date and time (legal appointment). The letter states that the tenant must allow access at this time and the Council will force entry to carry out the test (EICR) if the tenant is not home.

On the day of the legal appointment a relevant Officer will attend the tenant's property with the Electrical Contractor and a locksmith to carry out the electrical test (EICR). Should the tenant not be home at the time of the legal appointment the Council will force entry to carry out the test to ensure the property is safe. If the tenant is at home but refuses access, the Officer will refer this to our Legal Department to apply for a Court Injunction to compel the tenant to allow access to enable the Electrical Contractor to carry out the test (EICR)

4.4 Compliance Remedial Work

East Devon District Council will ensure there is a sturdy process in place for the management of any follow-up works required following the completion of a periodic inspection and test of an electrical installation or electrical portable appliance. East Devon District Council Electrical Contractor will as a minimum make safe and/or will repair all code 1 and code 2 defects identified by a periodic electrical installation inspection and test before leaving site after completing the inspection and testing works.

All Code 1 works will be completed on site during the initial visit.

Any code 2 works which cannot be completed at the time of the inspection and test will be completed within a maximum of 28 working days. Where time constraints during the test prevent completion. Once all C1 and C2 remedials are completed an EICR issued stating that the installation is in a satisfactory condition.

Code 3 (recommended improvement) type works will be referred to the Council's programme manager for a decision.

East Devon District Council will ensure there is a process in place to investigate and manage all RIDDOR notices issued regarding electrical safety.

4.5 Record Keeping

East Devon District Council will record and maintain a core asset register of all properties that have an active electrical supply and electrical installation. This register should identify electrical installations within all domestic properties and electrical installations within non-domestic (communal) properties and offices.

East Devon District Council will establish and maintain a register against each property asset of any electrical portable appliances and portable appliance testing (PAT) requirements.

East Devon District Council will establish and maintain accurate records of all completed Electrical Installation Condition Reports (EICRs), Minor Electrical Works Certificates (MEW) and Building Regulation Part P notifications associated with remedial works from these reports and Electrical Installation Certificates and keep these for a period of not less than 10 years.

East Devon District Council will establish and maintain accurate records of all completed electrical Portable Appliance Test reports and details of associated completed remedial works and keep these for a period of not less than 5 years.

4.6 Performance management

The following key performance indicators are reported to East Devon District Council's Leadership team & Housing Review Board –

- Number of properties with a valid electrical inspection certificate (EICR - 5 yearly)
- Category 1 & Category 2 actions arising from an unsatisfactory EICR (residential dwellings)
- Number of distribution boards in communal areas with a valid electrical inspection certificate (EICR - 5 Yearly)
- Category 1 & Category 2 actions arising from an unsatisfactory EICR (communal areas)

These key performance indicators are also used to monitor the contractor's performance.

4.7 Competent Persons

East Devon District Council will ensure that the manager(s) with lead responsibility for operational delivery are appropriately qualified holding a recognised safety management qualification.

East Devon District Council will ensure that only suitably competent NICEIC Approved Electrical Contractors (or equivalently accredited) contractors are procured and appointed to undertake electrical inspection, testing, installation and repair works.

The operational team with responsibility for delivery will check the relevant accreditations for the work that they are carrying out as part of the due diligence checks carried out at the procurement of any new contract. These checks will be undertaken on an annual basis to ensure competency and training is up to date.

East Devon District Council will ensure that only suitably competent engineers are employed or appointed to undertake electrical portable appliance testing (PAT). The operational team with responsibility for delivery will check the relevant qualifications of persons undertaking PAT testing to ensure that they are certified as competent to carry out PAT testing. These checks will be undertaken on an annual basis.

4.8 Training

The manager(s) with lead responsibility for operational delivery will hold a relevant qualification in respect of electrical safety compliance management.

On the job training will be provided by an external provider to those employees who will be responsible for managing the programme of electrical installation inspections and repair works to electrical installations and portable appliances as part of their daily job and other employees within the Property & Asset Team.

4.9 Quality Assurance

East Devon District Council will carry out 100 per cent desktop audits on the documentation using specialist compliancy software.

East Devon District Councils Electrical Compliancy team will carry out a minimum of 5% onsite inspection of completed works.

The Council will carry out an independent audit of electrical safety at least once every three years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues for correction.

4.10 Non-Compliance/Escalation Process

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 a risk to health or safety.

Any non-compliance issue identified at an operational level will be formally reported to the Corporate Lead for Property and Assets as part of the monthly reporting cycle.

Where necessary the Corporate Lead for Property and Assets will agree an appropriate course of corrective action with the relevant operational team(s) in order to address the non-compliance issue.

The Corporate Lead for Property and Assets will ensure timely reporting of non-compliance issues to the Assistant Director for Housing (Regulated Services) and the Executive Leadership Team, and where appropriate bring the issues and planned remedies to the attention of the Housing Review Board.

4.11 Electrical Safety Information

East Devon District Council considers good communication essential in the safe delivery of electrical safety management and will therefore ensure that relevant information is provided to residents. East Devon District Council will develop on their website information and advice to customers regarding electrical safety and will publish this information through other outlets such as social media and in the Housing Matters Magazine.

5. Policy Administration

1. Equality impact considerations

The Equality Impact Assessment below has been generated for the proposed recharge policy.

Protected Characteristic	Impact	Explanation / Action
Age	Neutral	The policy applies to all tenants regardless of age. Adjustments may be needed for elderly tenants (e.g., communication, access support).
Disability	Positive	Explicit commitment to reasonable adjustments for disabled tenants including when and how testing and repairs are completed.
Sex (Gender)	Neutral	No direct impact identified. Policy is applied equally.
Race / Ethnicity	Neutral	Information and support can be provided in alternative languages or formats if required.
Religion or Belief	Positive	Appointments can be scheduled to respect religious observance.
Sexual Orientation	Neutral	No direct impact identified. Policy is applied equally.
Gender Reassignment	Neutral	No direct impact identified. Policy is applied equally and confidentially to all tenants.
Marriage / Civil Partnership	Neutral	No direct impact identified. Policy applies to all household types.

Protected Characteristic	Impact	Explanation / Action
Pregnancy and Maternity	Neutral	Inspections and remedial works can be scheduled flexibly to accommodate pregnant tenants or those with newborns.

2. Data Protection

The [EDDC Data Protection Policy](#) outlines how we store and use personal information.

The following privacy notice(s) provide further information on how we will use personal data, how it is gathered, how long we will retain this information, and what rights individuals have in relation to this.

All our privacy notices can be found on the EDDC website – <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices/>.

3. Policy Review

We'll review this policy within three years of its publication, or sooner if:

1. There's a change in the law that affects how we manage recharges.
2. Feedback from tenants or staff shows the policy is causing unexpected problems.

As part of our commitment to continuous improvement, the Compliance Manager will carry out a twelve-monthly review of how the Electrical Safety Policy is working. This will help us spot any issues early and make things better.

History of most recent policy changes – Must be completed

Date	Section	Change	Origin of change (e.g. change in legislation)
08/10/2025	3.6	Pat testing	Tighter definition
08/10/2025	3.3	Issuing of Reports	Legislation change

4. Policy Authorisation

Actions have been taken to ensure the policy reflects the needs of our tenants and the priorities of East Devon District Council. Here's how we've involved others in shaping it:

- Executive Leadership Team (ELT): Our senior leadership team reviewed the policy and shared their feedback to help us align it with the council's wider goals.
- Repairs & Maintenance Tenant Scrutiny Group: Presenting the policy to this group allows their invaluable feedback to help shape the final version.
- Housing Review Board: The Board has reviewed and approved the policy, ensuring it supports safe, decent, and financially sustainable homes for all.

We're committed to making sure our policies work for tenants, staff, and the council. We also ask our tenants to continue sharing their experiences and ideas.

5. Responsibilities

The table below outlines who is responsible for different parts of the Electrical Safety policy and how it's applied:

Role	Responsibility
Tenant / Customer	<ul style="list-style-type: none"> - Live in the EDDC property in line with the Tenancy Agreement. - Report any electrical faults to EDDC.
Compliance Manager	<ul style="list-style-type: none"> - Owner for the policy and its application. - Reviews the policy regularly and gathers feedback from tenants to improve it. - Ensures the policy is applied correctly. - Acts as the data owner for related performance and reporting.
Compliance Team	<ul style="list-style-type: none"> - Applies the policy. - Shares feedback on how the policy is working in practice.
Electrical Contractors	<ul style="list-style-type: none"> - Deliver the policy in accordance with the policy.

6. Policy Dissemination

The application of the policy by EDDC first requires effective communication of the policy to both internal and external stakeholders. This will be achieved by:

- Internal Stakeholders Communication (Staff, Contractors, Managers):

- **Leadership Briefing:** Briefing to managers of the policy's purpose, what's changing, and expected impacts.
- **Team Meetings:** Present the policy, explain operational impacts, and answer questions during existing team meetings.
- **Written Documentation:** Distribute the policy document and a summary guide. Include a step-by-step process, decision flows, and key contacts.
- **Update Repairs Customer Service Scripting:** update the standard scripts to include for the recharge policy.
- **Monthly Reviews of the Electrical Safety Metrics:** The performance metrics above will be reviewed with the accountable data owners, and changes made were appropriate.
- External Stakeholders (Tenants, Leaseholders, Partners):
 - **Advance Notice:** Update the website before the policy takes effect, explaining the purpose of the policy, what's changing and why and when changes will occur and what tenants need to do. This will be communicated via Housing Matters, social media updates and community posters.
 - **Publish the new policy:** what it covers, how people are affected, and how to seek help.

7. Related policies, strategies, procedures, and legislation

Related Policies

To make things clear and fair for everyone, this policy works alongside a few others that help define responsibilities and support tenants:

- **Tenancy Policy:** This helps explain what tenants are responsible for. If something falls under tenant responsibility and isn't taken care of, it may lead to a re-charge.
- **Repairs Policy:** Ensures timely and risk-based categorisation of electrical repairs.
- **Recharge Policy:** Governs cost recovery for repairs, including those linked to electrical safety.
- **Fire Safety Policy:** Electrical faults are a major fire risk; this policy intersects with electrical safety through inspection regimes and remedial actions.
- **Smoke and CO Alarm Policy:** Supports electrical safety by ensuring detection systems are functional and integrated with electrical inspections.

- **Permissions Policy:** Tenants must seek approval for changes like that could affect wiring or access.
- **No Access Policy:** Defines procedures for when tenants deny access for inspections or repairs, and how the legal tools such as injunctions or warrants may be used to gain entry.

Legislative and Regulatory Context

This policy is informed by and complies with:

- Health & Safety at Work Act 1974.
- 18th Edition of the 'Wiring Regulations', which are published as British Standard 7671.
- Classification Codes – 18th Edition:
 - Code 1 (C1): Danger present. Risk of injury.
 - Code 2 (C2): Potentially dangerous.
 - Further Investigation (FI): Further investigation required without delay.
 - Code 3 (C3): Improvement recommended. Further remedial work is not required for the report to be deemed satisfactory.
- Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.
- Electrical Safety Standards in the Private Rented Sector (England) (Amendment) (Extension to the Social Rented Sector) Regulations 2025.
- Classification Codes for Domestic and Similar Electrical Installations (Best Practice Guide 4).
- Housing Act 2004 – Section 9 – Housing Health and Safety Rating System (HHSR) – Safety – Electrical Hazards (23).
- Regulatory Reform (Fire Safety) Order 2005 – Article 17 – Maintenance (Landlord Communal Areas Only).
- The Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 & The Provision and Use of Work Equipment Regulations 1998 (PUWER) – All lifting equipment owned and installed by EDDC.
- Defective Premises Act 1972 – Section 4 Landlord's Duty of Care in Virtues of Obligation or Right to Repair Premises Demised.
- Building Safety Act 2022 – Part 5 Other Provisions about Safety, Standards, etc.

- Landlord and Tenant Act 1985 – 8 Implied Terms as to Fitness for Human Habitation.
- Environmental Protection Act 1990 – Maintenance of Sewage Treatment Plants.