



## **Electrical Safety Policy**

**Policy Owner:**

**Chief Property Officer**

**Accountable Lead**

**Director of Property Safety and Compliance**

<b>Document Control</b>	
<b>Policy Level</b>	Regulatory  Strategic - sits under Health and Safety Property Safety Policy
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<b>Approved by</b>	BSOG 2026
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<b>Equality analysis</b>	EIA completed 25 Feb 2022.  No material changes affecting EIA, will be reviewed in line with policy.
<b>Next review date</b>	Feb 2027 Mar 2028

## **1 Policy Statement and Aims**

Curo recognises its duty of care as a developer, landlord and employer. The aim of this Electrical Safety Policy is to set out the key principles and commitments in line with all relevant statutory obligations. It sets out the key responsibilities, management framework and safe working practices for anyone acting for, or on behalf of Curo, who controls or influences the design, specification, selection, installation, commissioning, maintenance or operation of electrical systems or equipment<sup>1</sup>.

Curo recognises the risk to health and safety from electricity including fatality, electrical shock and burns from contact with live parts and the risk of fire from faulty electrical equipment or installations.

This policy must be adhered to to maintain compliance to relevant regulatory and other sector standards or codes of practice. Failure to adhere to this policy and associated procedures may have significant impacts on colleague, customer or contractor safety with resulting legal and financial consequences and will be dealt with under the Curo disciplinary procedure. This may include prosecution by the Health and Safety Executive (HSE) and/or a 'serious detriment' judgment from the Regulator for Social Housing (RSH) resulting in significant fines and a downgrade of the overall Governance rating of Curo as a registered provider.

## **2 Legal and other requirements**

### **2.1 Legal**

This policy operates in the context of the following key legislation:

- Health and Safety at Work Act etc. 1974 (HASWA)
- Landlord and Tenant Act 1985 (LTA)
- Housing Act 2004 (HA)
- Homes (Fitness for Human Habitation) Act 2018 (HFHHA)
- The Management of Health and Safety at Work Regs 1999 (MHSWR)
- The Provision and Use of Work Equipment Regulations 1998 (PUWER)
- The Electricity at Work Regulations 1989 (EAWR)
- Housing Health and Safety Rating System Regulations 2005 (HHSRS)
- Construction, Design and Management Regulations 2015 (CDM)
- Building Regulations 2010 (BR)

- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Electrical Safety Standards in the Private Rented Sector(England) (Amendment) (Extended to Social Rented Sector) Regulations 2025

## **2.2 Other best practice standards**

This policy operates in the context of the following relevant best practice, sector standards and codes of practice (as amended or updated):

- BS7671:2018, A3:2024 Requirements for Electrical Installations. IET Wiring Regulations
- Electrical Safety in Dwellings – Approved Document P, Building Regulations
- HSE, HSR25. Memorandum of Guidance on The Electricity at Work Regulations 1989
- HSE, HSG85. Electricity at Work: Safe Working Practices
- HSE, HSG107. Maintaining Portable Electrical Equipment
- HSE, GS38. Electrical test equipment for use on low voltage electrical systems
- BS EN 62305-3:2011. Protection against lightning: Physical damage to structures and life hazard
- FPA, RC35 Protection of Buildings Against Lightning Strike, version 3, 2004.

## **3 Definitions**

Refer to Annex A - Definitions and glossary.

## **4 Scope and context**

### **4.1 Persons**

This policy applies to all relevant persons including customers, visitors, colleagues, managing agents and contractors, who may be potentially affected by electrical risks whilst living or working within any premises which is owned or managed by Curo.

### **4.2 Premises**

This policy and supporting procedures apply to all Curo premises which might be temporarily or permanently occupied, utilised or maintained by the persons identified at 4.1 for residential, community, administrative or other work purposes. For example:

- Individual domestic units inc. market rent properties

- Purpose built blocks of flats
- Converted town Houses, including Grade I & II
- Extra care schemes
- Houses in multiple occupation (HMO's)
- Properties or schemes under refurbishment
- Commercial units
- Sheltered and supported housing schemes
- Community spaces
- Non-domestic type property e.g. garage blocks

### **4.3 Leasehold and shared ownership properties (domestic)**

Curo has no direct responsibility for the maintenance of electrical systems within domestic leasehold or shared ownership premises unless it is part of wider communal fixed wiring systems. However, Curo recognises that holistic building safety is very much dependent on the safe maintenance of electrical wiring systems within *relevant* leasehold premises, such as those situated within High Risk Residential Buildings<sup>2</sup> (HRRBs) and other Multi-Occupancy Residential Buildings<sup>3</sup> (MORBs). Curo will take a risk-based approach to managing this.

### **4.4 Leasehold properties (commercial)**

Curo has no direct responsibility for the maintenance of electrical systems within commercial leasehold premises unless specified within the terms of the lease. However, commercial leaseholders have legal duties as an employer under the HASWA and are responsible for maintaining any relevant electrical systems and equipment within their premises.

Curo takes a risk-based approach and recognises that holistic building safety is very much dependent on the safe maintenance of electrical systems and equipment within commercial leasehold premises that are structurally linked to HRRBs and MORBs. As such Curo will periodically coordinate with commercial leaseholders to ensure that periodic electrical safety checks have been carried out and to seek evidence where required.

### **4.5 Partnerships and other contractual arrangements**

Curo has a number of partnership arrangements with other service providers both within Curo owned property and within third party owned premises. Curo will cooperate and coordinate with partners and managing agents to ensure they are fully aware of any contractual arrangements or responsibilities placed upon them for the management and maintenance of electrical equipment and systems.

## **4.6 Context**

This policy is applicable to Curo Group which includes Curo Places, Curo Market Rent Services, and Curo Choice in the context of ensuring all electrical precautionary measures are taken and that all occupants are provided with adequate electrical safety information.

This policy sits within the context of the wider Health and Safety Property Safety Policy together with the strategic and operational commitments for Electrical identified within the Property Safety policy and property safety scorecard.

## **5 Principles (key objectives)**

In addition to securing legal compliance, this policy is intended to promote a proactive, best practice approach to managing Electrical risks with Curo properties. As such, the key principles and objectives of this policy is as follows:

### **5.1 Statutory compliance**

With regard to electrical safety, Curo will comply with all relevant statutory obligations listed in section 2 and commits to the following key objectives:

- Ensure safe working practices for any work involving electricity including the use of appropriate tools, PPE and isolation methods
- Ensure all electrical fixed wiring systems (installations) are maintained in a suitable and safe condition, so far as is reasonably practicable
- Ensure that all electrical fixed wiring systems (installations) are suitable and sufficient in regard to strength and capability
- Ensure that electrical systems and equipment are suitably earthed and insulated
- Ensure that portable electrical appliances<sup>4</sup>, provided by Curo, or utilised within Curo managed premises and communal areas, are maintained in safe condition

### **5.2 Best practice/sector standards compliance**

Curo will comply with all best practice and sector standards for the control of electrical safety in order to meet its general duties under the Acts identified at Section 2. This will include:

- All electrical work will be risk assessed with safe working practices and isolation procedures applied in accordance with HSG85 and GS38

- Electrical systems (installations) will be provided in accordance with the standards set out BS7671 (current edition) and Part P of the Building Regulations
- Electrical Installation Condition Report<sup>5</sup> (EICR) will be completed in accordance with BS7671 with periodic checks completed at least every 5 years or upon change of occupancy, whichever is soonest
- Replacement consumer units will be to current BS7671 standards, however, units fitted to previous standards will be left in situ where they have adequate Residual Current Device (RCD)<sup>6</sup> protection
- All Category 1 identified faults will, where possible, be made safe or rectified at time of inspection
- All Category 2 identified faults will be rectified within agreed spend limits at time of inspection or, where above spend limit, will be agreed and completed within 28 days
- Category 3 faults will only be rectified if opportunity to do so aligns with other rectification work
- Portable electrical appliances in Curo premises will be periodically tested in accordance with the guidance note HSG107. This is now covered under the separate ITEE policy.
- Lightning protection systems will be checked at least every 12 months for safe condition in accordance with BS EN 62305
- Where 'no access' prevents the meeting of Curo compliance programmes or remedial work this will be managed in line with the current 'no access' process.

### **5.3 Key commitments and property safety scorecard**

In order to meet the above statutory and best practice requirements Curo has identified the key strategic and operational commitments and performance measures for electrical inspection, test and servicing regimes. This is outlined within the Property Safety policy key commitments, agreed by the board and scorecard measures delegated to the Chief Property Officer.

Key commitments and property safety scorecard measures include:

- Completion of EICR checks within timescale
- Completion of identified Category 1 and 2 remedial works within timescale
- Completion of Portable Appliance Testing (PAT) within timescale
- Completion of lightning protection systems within timescale

## **6 Roles and responsibilities**

### **6.1 Combined Board and Exec**

The Combined Board, through the Chief Executive and Chief Operations Officer (Policy Owner), will ensure that the Electrical Policy delivers Curo's strategic objectives and reflects corporate values.

### **6.2 Chief Operations Officer**

Has overall strategic accountability for this policy and associated procedures and is responsible for:

- Leading the strategic and cultural direction for all Property Safety policies and championing property safety at Combined Board
- Providing sufficient resources to meet the requirements of this policy and associated procedures
- Ensuring adequate and timely reporting to the Regulator for Social Housing (RSH) where any 'Serious detriment'<sup>7</sup> situation has been identified

### **6.3 Director of Property Safety and Compliance**

- Keeping the Combined Board apprised of any legislative changes for electrical safety and any required changes to strategy, policy or procedure
- Ensuring this policy and associated procedures are maintained in date and regularly reviewed
- Ensuring robust systems and controls are in place to deliver all required electrical safety and remedial works programmes
- Ensuring sufficient planning and resources to implement a proactive property investment strategy to keep electrical systems and equipment up to current safety standards
- Ensuring that arrangements for electrical work is properly planned, organised, controlled, monitored and reviewed in accordance with CDM
- Sponsoring audits of this policy and procedure to monitor the effectiveness, within agreed timescales and in liaison with the Governance team
- Ensuring adequate oversight and scrutiny of measured performance.
- Ensuring the competency of the Property Safety and Major Projects team in relation to all relevant aspects of this policy and electrical safety
- Ensuring all legal and other compliance requirements are met.

- Delivery of the principles and key objectives of this policy through appropriate team plans, including the timely delivery of electrical safety compliance programmes and remedial works.
- Reporting of performance in line with property safety commitments to relevant management forums.
- Provide adequate support to the business, through Subject Matter Experts (SME), to assist them in meeting their roles and responsibilities.
- Developing a rigorous approach to Quality Assurance (QA) of electrical safety processes, to ensure a high quality of service delivery across the business and the identification of service improvement opportunities.
- Effective procurement, delivery and management of all electrical works contracts and ensuring high levels of performance against contract KPIs in partnership with the Contract Business Partner.
- Ensuring emergency lighting and fire alarms are tested by the FSCO team.

#### **6.4 Director of Property Maintenance**

Accountable for:

- Ensuring potential 'Serious detriment', RIDDOR reportable incidents and other significant incidents are fully investigated, with root cause analysis, and are reported to Executive and Combined Board
- Prompt response to repair requests for electrical safety issues
- Ensuring the competency of the Responsive Repair teams in relation to all relevant aspects of this policy and electrical safety
- Ensuring Electricians (in-house and contracted) are qualified to current IET Wiring Regulations, Part P of Building Regulations and any other current sector qualifications or professional registrations, in accordance with section 8 of the Electrical Procedure
- Provision of relevant electrical safety information to colleagues or contractors, where required, to enable safe systems of work to be employed
- Completion of risk assessment and relevant risk control measures to be employed for safe electrical work
- Provision of appropriate and safe tools and protective equipment relevant for electrical work
- Ensuring all electrical work is planned, organised, controlled, monitored and reviewed (in line with CDM)

- Ensuring adequate emergency arrangements and incident reporting processes are employed by the Response Repairs team
- Quality assurance process for electrical work of the Response Repair team
- Robust recordkeeping of all required electrical works certification
- Oversight of the implementation of this policy and its aims.

## **6.5 Director of Asset Management**

Accountable for:

- Ensuring electrical systems are considered and planned for, in accordance with legal and other technical standards, within the Home Improvement and Cyclical works programmes
- Ensuring accurate collation and management of electrical component data through Stock Condition Surveys to adequately inform electrical compliance programmes
- Ensuring the competency of the Asset Management team in relation to all relevant aspects of this policy and electrical safety
- Ensuring adequate communication of electrical safety issues for planned works and relevant information sharing with colleagues and customers
- Ensuring suitable and sufficient risk assessments and safe systems of work are in place for all planned electrical work including safe isolation procedures
- Ensuring electrical work is planned, organised, controlled, monitored and reviewed (in line with CDM)
- Ensuring all electrical safety incidents are reported
- Ensuring adequate quality checks are in place for completed electrical work
- Ensuring adequate recordkeeping and certification for completed electrical work including sign off by the QS

## **6.6 Head of Lettings and Tenancy Management**

Responsible for:

- Ensuring the competency of the ~~Customer Accounts and~~ Lettings & Tenancy teams in relation to all relevant aspects of this policy and electrical safety

- Provision of any relevant electrical safety information to new customers during sign up
- Ensuring a valid and satisfactory EICR is in place prior to all new lettings
- Ensuring a valid and satisfactory PAT is in place for any portable appliances provided by Curo as part of any new letting

## **6.7 Director of Estates Services**

Responsible for:

- Prompt reporting and resolution of any electrical safety hazards identified during Estates communal area inspections
- Prompt response to any concerns raised by customers in relation to electrical safety issues within their building
- Ensuring the competency of the Estates Services team in relation to all relevant aspects of this policy and electrical safety

## **6.8 Senior Property Manager**

Responsible for:

- Ensuring the competency of the Commercial Property teams in relation to all relevant aspects of this policy and electrical safety
- Ensuring relevant legal obligations and safety compliance standards are included within relevant domestic and commercial property lease agreements
- Requesting evidence from leaseholders of a valid and satisfactory EICR to be passed to PSCT for verification
- Verification that any identified responsibilities are complied with, including periodic EICR
- Ensuring, where relevant, managing agents maintain safe electrical systems and appliances (in accordance with best practice standards)

## **6.9 Director of Housing**

Accountable for:

- Referral of customer concerns about electrical safety to relevant internal departments and monitoring of any required remedial action to successful conclusion
- Taking appropriate action, legal if necessary, where customers fail to meet expected standards for electrical safety compliance programmes

- Ensuring the competency of the Tenancy Compliance and Management teams in relation to all relevant aspects of this policy and electrical safety

### **6.10 Director of Customer Contact**

Responsible for:

- Ensuring the competency of the Customer Contact team in relation to all relevant aspects of this policy and electrical safety
- Prompt referral of customer concerns about electrical safety issues to relevant internal departments
- Reporting of all customer-related electrical safety incidents on the Curo Incident Reporting system and in accordance with Curo Incident Reporting Procedure

### **6.11 Head of Specialist Housing**

Accountable for:

- Ensuring the competency of the Curo Choice colleagues in relation to all relevant aspects of this policy and electrical safety
- Ensuring, where relevant, managing agents maintain safe electrical systems and appliances (in accordance with best practice standards)

### **6.12 Chief Governance Officer**

Accountable for:

- Oversight of compliance with this policy through internal and external audit process, refer to Electrical Safety Procedure section 17

### **6.13 Head of Procurement**

- Ensuring robust procurement processes are in place for all contracted construction works which involve any potential for exposure to or work with electricity
- Ensuring adequate procurement arrangements are in place to check the competency of any persons working with electricity in accordance with recognised industry standards

## **6.14 Property Safety Manager (M&E)**

Subject matter expert (SME) for electrical safety at Curo, responsible for:

- Instructing electrical safety compliance works relating to inspection, test and remedial works programmes in line with current standards
- Managing relevant electrical safety compliance budgets
- Oversight of all electrical component data on QL relating to compliance programmes
- Ensuring adequate QA of performance and safety
- Provision of advice and guidance to the business on electrical safety including electrical design specifications and assisting in the verification of electrical safety documentation
- Liaison and engagement with customers, as and when required, including customer incidents or complaints relating to electrical safety
- Ensuring any relevant information or changes to electrical infrastructure within MORBs and HRRBs are passed to the Fire Manager for consideration within the FRA
- Ensuring any relevant information or service plans on electrical infrastructure within MORBs and HRRBs are provided to the emergency services where available
- Investigation of electrical safety incidents and near misses, including written investigation reports to senior management with recommendations for improvements where required
- Submission of electrical compliance performance data to management

## **6.15 Property Safety Supervisor (M&E)**

Responsible for:

- QA of in-house and contractor electrical records to ensure the results of inspection and tests are recorded correctly on the appropriate certificates or reports
- On site QA of in-house and contracted electricians to ensure safe working practices are adhered to
- Competency checks on electricians to ensure they meet NICEIC standards

As a nominated Quality Supervisor (QS), and in accordance with NICEIC requirements, responsible for:

- Ensuring that the results of inspection and testing are recorded correctly on the appropriate certificates or reports

- Ensuring that the business' premises, equipment, documentation and records are available for inspection when required by NICEIC
- Safeguarding all unused NICEIC forms of certification and reporting any loss, theft or misuse
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### **6.16 Major Projects Programme Manager**

Responsible for:

- Ensuring the competency of the Major Projects team in relation to all relevant aspects of this policy and electrical safety
- Robust contractor management under the CDM<sup>8</sup> Regulations including the need to ensure all electrical work is planned, organised, controlled, monitored and reviewed for any construction/project work
- Cooperation and coordination with the Property Safety Manager (M&E) in relation to the development and use of design specifications and arrangements for relevant projects and plans
- Provision of adequate electrical information to any appointed designers, consultants or contractors that arrange, instruct, supervise, specify or deliver construction, maintenance or refurbishment works
- Robust and adequate checks on the competency of electrical contractors and sub-contractors, including relevant trade registrations and licenses
- Robust and adequate checks on the competency of design teams and design sub-contractors, including relevant professional registrations and licenses
- Ensuring compliance with competency requirements of designers, contractors and subcontractors in respect of works on High Risk Residential buildings
- Maintaining adequate property information as part of the 'Golden thread' for building safety
- Ensure that records are updated as required on completion of projects and that any test and commission certificates are provided to the Property Safety Manager (M&E)

### **6.17 Head of Affordable Development**

Responsible for:

- Pre-contract technical review – ensuring all electrical installation design specifications are to current standards, reviewed and signed off before exchange (refer to Curo Design Brief)
- Ensuring the terms of engagement for contracted electrical works are satisfied during build
- Ensuring all rectification work is completed and electrical system documentation is in place prior to property completion (refer to Handover Document Tracker)

### **6.18 Empty Homes Manager**

Responsible for:

- Ensuring electrical safety issues are assessed as part of the PVI and that all Voids have a valid and satisfactory EICR prior to re-occupation
- Ensuring that all Category 1 and 2 defects are completed at Void stage
- Ensuring the competency of the Voids team operatives in relation to all relevant aspects of this policy and electrical safety
- Ensuring Void team electricians (in-house and contracted) are qualified to current IET Wiring Regulations, Part P of Building Regulations and any other current sector qualifications or professional registrations, in accordance with section 8 of the Electrical Procedure
- Provision of relevant electrical safety information to colleagues or contractors, where required, to enable safe systems of work to be employed
- Completion of risk assessment and relevant risk control measures to be employed for safe electrical work
- Provision of appropriate and safe tools and protective equipment relevant for electrical work
- Ensuring all electrical work is planned, organised, controlled, monitored and reviewed (in line with CDM)
- Ensuring adequate emergency arrangements and incident reporting processes are employed by the Void team
- Quality assurance process for electrical work of the Void team
- Robust recordkeeping of all required electrical works certification

### **6.19 Health and Safety Manager**

- Responsible for:
- Building systems

- Building operations
- Risk Management
- Leadership and Planning
- Operational practice
- Monitoring and control

## **6.20 Facilities Manager**

Responsible for:

- Ensuring any 'construction work' (as defined by CDM) within Curo office accommodation is conducted in accordance with all relevant Electrical and CDM regulations and safe systems of work
- Provision of any relevant electrical safety information to contractors or colleagues prior to commencement of any work
- Ensuring relevant office based electrical systems and equipment safety issues are promptly reported and rectified
- Provision of electrical safety awareness training or toolbox talks to the Facilities team

## **6.21 Learning & Development Team**

Responsible for:

- Liaising with relevant business leads to ensure competency requirements are met in line with section 8 of the Electrical Safety Procedure
- Providing assurance to KSG that competency levels are met and that adequate records are held to verify competency levels

## **6.22 Colleagues**

In relation to electrical safety, responsible for:

- Taking reasonable care for his/her/their own safety and that of other relevant persons who may be affected by his/her/their acts or omissions at work
- Not interfering with, misusing, removing or disabling any electrical equipment, devices or provisions that are provided for the purposes of safety
- Co-operating with Curo management, so far as is necessary, to enable legal duties and requirements for electrical safety to be complied with

- Reporting to line management or the Property Safety Manager (M&E) directly of any defects, situations or shortcomings which may constitute an electrical hazard or risk
- Attending and complying with any identified training or instruction required for the management of electrical risks
- Making full and proper use of any electrical safety information, risk assessments and safe systems of work provided
- Making full and proper use of any control measure, other thing or facility provided for the purposes of compliance with this policy and electrical regulations
- Making full and proper use of any personal protective equipment provided for the prevention of the risk of exposure to electricity

## **7 Delivery, monitoring and review**

All aspects of this policy including the delivery of key principles and objectives, will be implemented through the associated Electrical Safety Procedure.

This policy will also be subject to robust QA, performance monitoring and management review processes as detailed within the associated procedure. These will be overseen by the Audit & Assurance Committee, KSG and BSOG and will include:

- Competency – awareness and training for professional standards
- Measurement of success – performance and oversight
- Data, documents and recordkeeping – storage, validation, reconciliation and service records
- Internal and external audit – periodic
- Improvement – incident recording and investigation, non-conformity and corrective actions
- Management review

This Electrical Policy and associated Electrical Procedure will be subject to a minimum 3 yearly H&S management system audit and review, or sooner where there are lessons learned from incidents, or legislative and sector best practice changes.

## **Equality and Diversity Implications**

This policy with supporting processes and procedures are consistent with Curo's commitment to equality and diversity and particularly in relation to the consideration of support for vulnerable customers in relation to their electrical systems.

## **Reasonable adjustments**

Colleagues are empowered to make reasonable adjustments based on individual customer needs ensuring equal access to services.

Colleagues are encouraged to assess each situation thoughtfully and make adjustments where appropriate, considering factors such as accessibility, medical or specific requirements. These adjustments should be made in a way that meets statutory and regulatory requirements, maintains a high standard of service, and supports customers in a fair and respectful manner.

## Annex A - Definitions and glossary

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<sup>1</sup> **Electrical systems or equipment** – includes fixed wiring systems and portable electrical appliances.

<sup>2</sup> **HRRB** – High Risk Residential Buildings are prescribed as one in which the floor surface of the building's top storey is 18 metres or more above ground level or where the building contains more than 6 storeys.

<sup>3</sup> **MORB** - Multi-Occupancy Residential Buildings, for the purpose of this policy (not yet defined in law), includes any premises with two or more dwellings that exceeds 11m, for example, general needs blocks or independent living schemes.

<sup>4</sup> **Portable appliance** – Portable appliances and equipment is that which is intended to be connected to a generator or a fixed installation by means of a flexible cable and either a plug and socket or a spur box, or similar means. This includes equipment that is either hand-held or hand-operated while connected to the supply, intended to be moved while connected to the supply, or likely to be moved while connected to the supply (HSG107)

<sup>5</sup> **EICR** – Electrical Installation Condition Report is a periodic safety condition check completed by a competent and qualified electrician in accordance with the standards and frequency stated in BS7671 IET Wiring Regulations

<sup>6</sup> **RCD** – Residual Current Device

<sup>7</sup> **Serious detriment** – failure to meet the Regulator for Social Housing consumer standards which may require intervention if it fails the 'serious detriment test'

<sup>8</sup> **CDM** – Construction Design and Management Regulations 2015 in relation to all "construction work" (as per note 15)