

## Electrical Safety Council response to Communities, Equality and Local Government Committee Consultation on the Housing (Wales) Bill

### 1. Overview

- 1.1. The Electrical Safety Council (ESC) welcomes the invitation to submit written evidence to the Communities, Equality and Local Government Committee inquiry into the Housing (Wales) Bill.
- 1.2. As the UK's only charity committed to reducing electrical fires and electricity-related deaths and injuries at home and at work, our remit is to promote and encourage public awareness of issues surrounding electrical safety.
- 1.3. The Private Rented Sector (PRS) in Wales is seeing unprecedented growth and is projected to account for one in five homes by 2020<sup>1</sup>, with increasing numbers of families and vulnerable people renting privately. As a consequence, the PRS will continue to play an important role in meeting Wales' housing need.
- 1.4. Despite this, tenants often face poor conditions and serious safety hazards. According to government statistics, 68% of all accidental fires in Welsh homes (more than 1,166 annually – further information is contained in Appendix 1) are caused by electricity. Independent research also suggests that private tenants are more likely to be at risk of electric shock or fire than owner occupiers.<sup>2</sup>
- 1.5. Whilst we welcome the principles behind the Housing (Wales) Bill and the Government's continuing efforts to get a better deal for PRS tenants, we are concerned that the Bill as it stands will not create better property standards.
- 1.6. Provisions set out in Part One of the Bill, including the introduction of mandatory registration and licensing of landlords, are a positive step for governance of the PRS. However, any proposal seeking to improve standards needs to carefully consider the condition of the property, rather than simply the suitability of the owner or landlord.
- 1.7. We believe more must be done to reduce risks to private renters by putting precautionary measures in place to ensure their safety.

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<sup>1</sup> CIH Cymru, Welsh Housing Review 2012

<sup>2</sup> Research conducted by Ipsos MORI. 25<sup>th</sup> June-2<sup>nd</sup> July 2010

1.8. Therefore our submission focuses on:

- The clear imperative for enhanced requirements around electrical inspections and tests of rented properties to be included in the Bill, potentially through an amendment to Clause 28 (Code of Practice);
- The case for improving electrical safety by explicitly specifying what orientation landlords should be subject to in Clause 12 (Training Requirements);
- Our support for Part 4 (Standards for Social Housing);
- Wider support for enhanced provisions around inspection and testing of electrical appliances and installations in the PRS, most recently highlighted in a joint letter to Carl Sargeant AM (See Appendix 2) from 10 businesses, charities, trade associations and public bodies.

## **2. Proposals to allow for the introduction of a Code of Practice for landlords are welcome, and could go further**

- 2.1. The ESC supports proposals to allow Welsh Ministers to introduce a Code of Practice through Clause 28 (Code of Practice). This will ensure 'accidental landlords' are made aware of their responsibilities, and provide a reference point against which to measure and act against rogue landlords who do not fulfil their responsibilities.
- 2.2. We believe that the effectiveness of the Code of Practice would be improved by the inclusion of requirements around electrical safety, and that the Bill should explicitly allude to the introduction of these measures in order to ensure that Government has an appropriate mandate.
- 2.3. Specifically, we want Government to introduce a requirement for five yearly checks, by a registered electrician, of both fixed electrical installations in all rented property and any electrical appliances supplied with lets. Our view on these checks was supported by 10 businesses, charities, trade associations and public bodies who co-signed an open letter to Housing Minister Carl Sargeant (sent on 10/01/14, a full copy can be found in Appendix 2), showing there is wide support from the sector.
- 2.4. Our reasons for recommending a five yearly timeframe are largely because we wish to strike a balance between the likelihood of risks to tenants from deterioration in the electrical installation/appliances due to wear and tear, faults and tampering, versus costs placed on landlords.
- 2.5. We recommend in all our literature that full inspections by registered electricians are supplemented by visual checks from the landlord, managing agent or responsible person at more regular intervals (i.e. yearly or on change of tenancy, whichever comes first). If such a check were to uncover obvious signs of damage to the installation/appliances, we would expect that, as currently required by the Landlord and Tenant Act 1985, landlords would

take appropriate steps to ensure they are in safe working order (please see Appendix 3 for an example checklist as carried on the ESC website).

### **3. Training requirements for landlords are welcome but should include further detail defining the standard a decent home must reach and best practice management procedures for landlords**

- 3.1. The ESC welcomes Clause 12 (Training Requirement) of the Bill but believes it could go further in stipulating minimum conditions homes must meet in order to be let. Currently, we are concerned that the Government's aim to ensure that tenants in the PRS have a 'decent' home may be undermined by the lack of detail defining 'decent' homes and best practice procedures for landlords.
- 3.2. Therefore, we would like to see the inclusion of property standards – including for electrical safety – in the list of training requirements. As it stands, there is no detail regarding how to manage property standards.

### **4. Proposals for local authorities to be required to meet the Welsh Housing Quality Standard (WHQS) are welcome**

- 4.1. The ESC welcomes Part 4 (Standards for Social Housing) of the Bill which will require local authorities to be required to meet the WHQS which contains provisions on electrical safety. This will put standards of accommodation for both existing and new social housing on a statutory basis.

### **5. About the Electrical Safety Council**

- 5.1. The ESC is a UK-wide charity committed to reducing electrical fires and electricity-related injuries at home and at work.
- 5.2. Every year over 20,000 domestic fires are caused by faults and misuse of electrical appliances and installations throughout Great Britain. A further 2.5 million UK adults experience a mains voltage electric shock each year and around 70 people die from electrical accidents in the home.

## Accidental electrical fires in dwellings in Wales 2012-13, by cause and source of ignition

	Faulty fuel supply - electricity	Faulty leads or appliance	Misuse of equipment or appliance	Placing articles too close to heat	All
<b>Cooking Appliances</b>					
Cooking appliance - Cooker incl. oven	3	28	339	42	412
Cooking appliance - Deep fat fryer	1	2	1	0	4
Cooking appliance - Grill/Toaster	1	7	111	3	122
Cooking appliance - Microwave oven	0	8	52	1	61
Cooking appliance - Other cooking appliance	0	2	8	1	11
Cooking appliance - Ring/hot plate (separate appliance)	1	0	57	20	78
<b>All</b>	<b>6</b>	<b>47</b>	<b>568</b>	<b>67</b>	<b>688</b>
<b>Space heating appliances</b>					
Heating equipment - Heating/Fire	0	11	9	32	52
Heating equipment - Other heating equipment	0	1	0	2	3
<b>All</b>	<b>0</b>	<b>12</b>	<b>9</b>	<b>34</b>	<b>55</b>
<b>Central and water heating appliances</b>					
Heating equipment - Central heating/Hot water	3	10	1	3	17
Heating equipment - Separate water heating	2	4	0	0	6
<b>All</b>	<b>5</b>	<b>14</b>	<b>1</b>	<b>3</b>	<b>23</b>
<b>Blowlamps, welding and cutting equipment</b>					
Industrial equipment - Welding/Cutting equipment	0	1	4	2	7
Other domestic style appliance - Blow lamp/Paint removal	0	0	2	0	2
<b>All</b>	<b>0</b>	<b>1</b>	<b>6</b>	<b>2</b>	<b>9</b>
<b>Electrical distribution</b>					
Electricity supply - Apparatus - batteries, generators	11	10	0	0	21
Electricity supply - Wiring, cabling, plugs	105	36	5	1	147
Heating equipment - Power Source	0	3	0	1	4

<b>All</b>	<b>116</b>	<b>49</b>	<b>5</b>	<b>2</b>	<b>172</b>
Other electrical appliance					
Electric lighting - Fairy lights	1	0	0	0	1
Electric lighting - Fluorescent lights	1	1	0	0	2
Electric lighting - Other incandescent light bulbs	0	4	1	4	9
Electric lighting - Other lights	2	2	1	2	7
Electric lighting - Spot lights	5	3	1	5	14
Other appliance or equipment	0	2	0	1	3
Other domestic style appliance - Audio equipment	0	1	0	0	1
Other domestic style appliance - Battery charger	0	1	0	1	2
Other domestic style appliance - Dishwasher	1	23	0	0	24
Other domestic style appliance - Electric blanket	1	3	0	0	4
Other domestic style appliance - Electric kettle	1	0	0	0	1
Other domestic style appliance - Extractor fan	2	7	0	0	9
Other domestic style appliance - Fridge/Freezer	2	13	0	0	15
Other domestic style appliance - Hair dryer	0	3	0	0	3
Other domestic style appliance - Iron	0	0	1	0	1
Other domestic style appliance - Other domestic style a	0	2	1	2	5
Other domestic style appliance - Other electrical visual c	0	0	0	1	1
Other domestic style appliance - PC equipment (domes	0	2	1	0	3
Other domestic style appliance - Spin dryer	0	1	0	0	1
Other domestic style appliance - TV	2	8	0	0	10
Other domestic style appliance - Tumble dryer	3	37	4	2	46
Other domestic style appliance - Vacuum cleaner	0	0	1	0	1
Other domestic style appliance - Video/DVD	0	1	0	0	1
Other domestic style appliance - Washer/Dryer combin	0	2	0	0	2
Other domestic style appliance - Washing machine	5	33	0	0	38
<b>All</b>	<b>26</b>	<b>149</b>	<b>11</b>	<b>18</b>	<b>204</b>
Other sources					
<b>Heating equipment - Food warming (not cooking)</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>

Other (where power source is 'electric')					
<b>Other</b>	<b>4</b>	<b>6</b>	<b>2</b>	<b>2</b>	<b>14</b>
<b>All</b>	<b>157</b>	<b>278</b>	<b>603</b>	<b>128</b>	<b>1,166</b>

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Source: Incident Recording System

Carl Sargeant AM  
Minister for Housing and Regeneration  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA

10<sup>th</sup> January 2014

Dear Mr Sargeant,

## **ELECTRICAL SAFETY IN THE PRIVATE RENTED SECTOR**

How we live is changing. The Private Rented Sector (PRS) in Wales is seeing unprecedented growth and is projected to account for one in five homes by 2020<sup>1</sup>, with increasing numbers of families and vulnerable people renting privately. As a consequence, the PRS will continue to play an important role in meeting Wales' housing need. Despite this, tenants often face poor conditions and serious safety hazards.

According to official statistics, 68% of all accidental fires in Welsh homes (1,166 in total for 2012/13) are caused by electricity. Independent UK-wide research also suggests that private tenants are more likely to suffer an electric shock or fire than owner-occupiers.<sup>2</sup>

Whilst we welcome the Government's continuing efforts to improve conditions and drive up standards in the PRS, more should be done to reduce risks to tenants by putting precautionary measures in place to ensure their safety.

We the undersigned believe that improving electrical safety for tenants would not present an undue regulatory burden for landlords, and thus should form a core part of any new conditions they are required to meet.

In the context of further debate around the Housing Bill - and more general deliberations over the future of the PRS - we urge you to seriously consider introducing the following requirement:

- Mandatory five-yearly safety checks by a competent person of electrical installations and any electrical appliances supplied with privately let homes;

Improving standards in the PRS will not only benefit tenants but also help landlords keep their properties safe from fires and other incidents that could damage their investment. Making private renting a better

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<sup>1</sup> CIH Cymru, Welsh Housing Review 2012: [http://www.cih.org/resources/PDF/Wales%20Policy/WELSH\\_HOUSING\\_REVIEW\\_2012-english.pdf](http://www.cih.org/resources/PDF/Wales%20Policy/WELSH_HOUSING_REVIEW_2012-english.pdf)

<sup>2</sup> Research conducted by Ipsos MORI. 25<sup>th</sup> June-2<sup>nd</sup> July 2010.

option is crucial to ensuring everyone has a safe, affordable home to live in so we hope that you will seek to introduce these much-needed changes and await your response with great interest.

Yours sincerely,



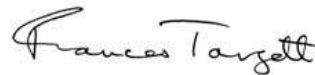
**Phil Buckle, Director General**  
Electrical Safety Council



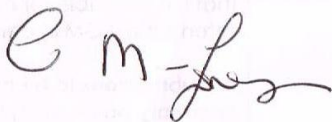
**Julie Barratt, Director**  
CIEH Wales



**Lynda Campbell, Regional Director  
for Wales**  
British Gas



**Frances Targett, Director**  
Citizens Advice Cymru



**Carole Morgan-Jones, Director**  
NEA Cymru



**Stephanie Lloyd, President**  
NUS Wales



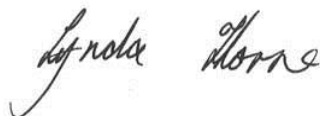
**John Puzey, Director**  
Shelter Cymru



**Ben Collins, Regional Director  
Wales and Northern Ireland**  
RICS



**Steve Clarke, Managing Director**  
Welsh Tenants



**Lynda Thorne, Cabinet Member,  
Communities, Housing & Neighbourhood Renewal**  
Cardiff Council

Copied to: Christine Chapman AM, Chair of the Communities, Equality and Local Government Committee