



**NFCC**  
National Fire  
Chiefs Council

The professional voice of the  
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To whom it may concern,

On behalf of the National Fire Chiefs Council, thank you for the opportunity to comment on the proposals laid out in the Ministry's consultation paper 'Electrical Safety in the Private Rented Sector'.

Please find attached our response. The NFCC is the professional voice of the UK fire and rescue services, and is comprised of a council of all UK Chief Fire Officers.

This submission was put together through the NFCC's Prevention Coordination Committee.

Any further correspondence in relation to the response can be directed to Penny Pender via [info@nationalfirechiefs.org.uk](mailto:info@nationalfirechiefs.org.uk).

Yours sincerely,

Stewart Edgar  
Chair, Prevention Coordination Committee  
National Fire Chiefs Council

## Electrical safety in the private rented sector

### Ministry for Housing, Communities & Local Government (MHCLG) consultation response

The working group set up by the Department for Communities and Local government (now MHCLG) has recommended introducing 5 yearly mandatory electrical installation checks for private rented property, and that other safety measures be encouraged as good practice and set out in guidance.

The current consultation has invited views and comments to gather additional evidence on the recommendations made by the working group.

**Recommendation 1:** 5 yearly mandatory electrical installation checks should be set out in secondary legislation.

**Response:** *The National Fire Chiefs Council (NFCC) supports this recommendation as while the majority of landlords are clearly responsible, feedback to NFCC officers from the sector has included a desire to have clarity, which secondary legislation will provide.*

**Recommendation 2:** Visual checks of the safety of the electrical installation by landlords at a change of tenancy should be encouraged as good practice and set out in guidance.

**Response:** *NFCC do not have direct evidence for this recommendation, but supports it as a logical and proportionate 'bare minimum' standard to support tenant safety.*

**Recommendation 3:** A report should be issued to the landlord which confirms that an Electrical Installation Condition Report (EICR) has been completed along with confirmation that any remedial work necessary has been undertaken satisfactorily. A copy should be issued to the tenant at the beginning of the tenancy and should be made available to local authorities on request.

**Response:** *NFCC do not have direct evidence for this recommendation. However, with a relatively high incidence of electrical/electrical appliance fires, and in light of the post Grenfell landscape, there is a clear desire from tenants/residents to feel safe in their homes. Providing a EICR would be one part of helping people to feel safe.*

**Recommendation 4:** Landlord supplied electrical appliance testing and visual checks of electrical appliances by landlords at a change of tenancy should be encouraged as good practice and set out in guidance.

**Response:** *NFCC has provided evidence that fires caused by white goods in particular are a serious issue and can result in significant property damage and even loss of life. White goods can be left on when people are out or asleep, fridges and freezers are left running 24/7.*

*NFCC would encourage electrical appliance testing and visual checks of electrical appliances, but would however, recommend that work is carried out to explore an effective way of ensuring that white goods are registered so that residents can be informed of safety*

issues and that older/inherited or gifted (etc.) white goods are checked against a product recall database.

**Recommendation 5:** The installation of RCDs by landlords should be encouraged as good practice and set out in guidance.

**Response:** *NFCC do not have direct evidence for this recommendation, but supports it as a logical and proportionate standard to support tenant safety.*

**Recommendation 6:** A private rented sector electrical testing competent person's scheme should be set up which would be separate from existing Building Regulations competent person's scheme.

**Response:** *NFCC do not have direct evidence for this recommendation, but support a proportionate and realistic scheme to manage the proposed testing regime.*

**Recommendation 7:** MHCLG should commission the Electrotechnical Assessment Specification (EAS) management committee to consider the most effective method of recognising 'competent PRS testers' to carry out electrical inspections and tests.

**Response:** *NFCC do not have direct evidence for this recommendation, but support a proportionate and realistic scheme to manage the proposed testing regime.*

**Recommendation 8:** Legislative requirements should be phased in, beginning with new tenancies, followed by all existing tenancies.

**Response:** *NFCC do not have direct evidence for this recommendation, but support a realistic implementation of this scheme that will allow all stakeholders to fully engage (although an excessive delay in a phased implementation would not be supported).*