

SHORT-CHANGED

**ELECTRICAL
SAFETY IN
SHORT TERM
LETS IN
ENGLAND**

Electrical Safety First is the only UK charity dedicated to reducing deaths, injuries and fires caused by domestic electrical accidents: www.electricalsafetyfirst.org.uk



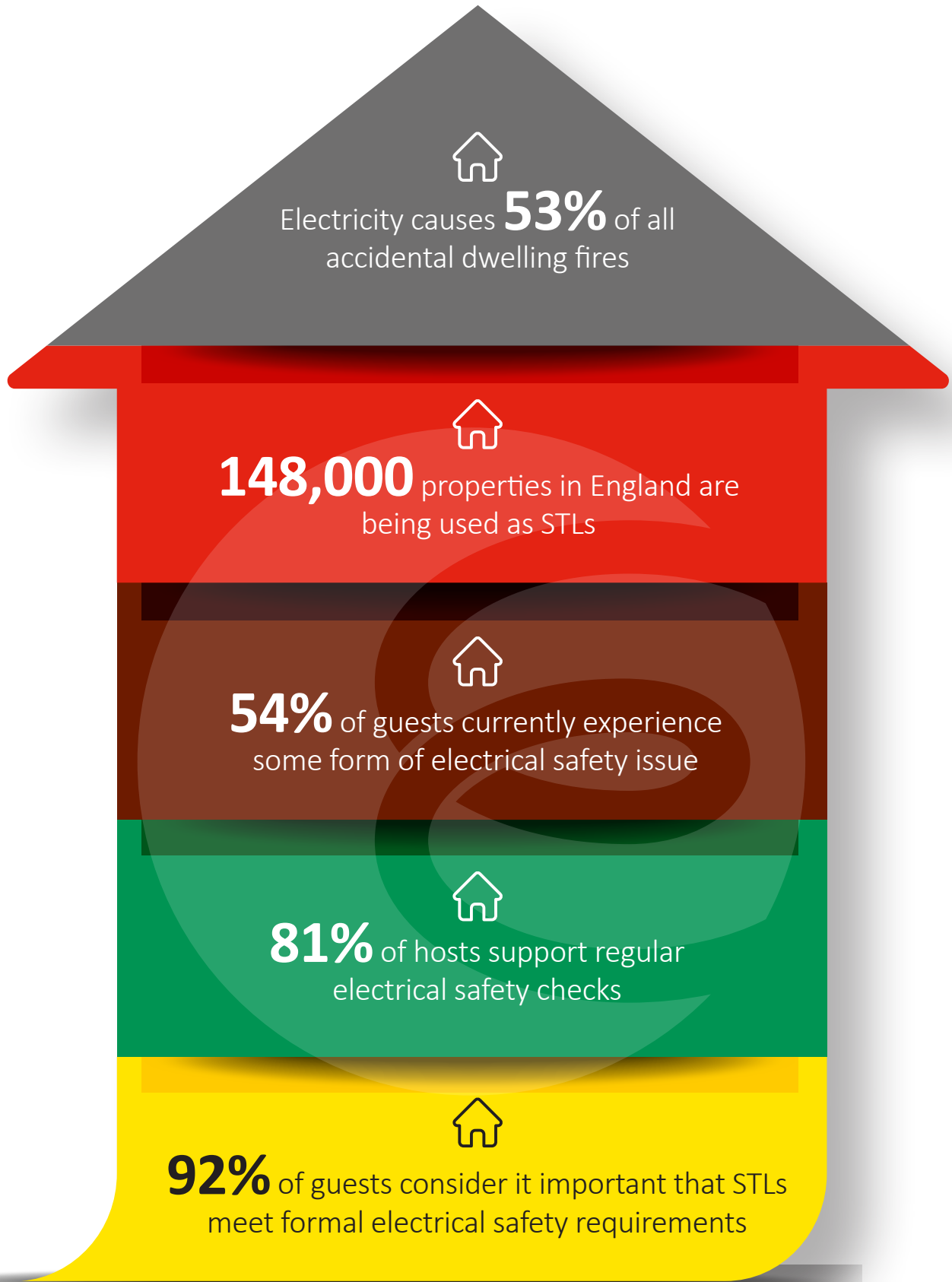
Electrical Safety and Short Term Lets (STLs) in England

Electrical Safety First

Electrical Safety First is the UK charity dedicated to reducing deaths and injuries caused by electrical accidents. Our aim is to ensure everyone in the UK can use electricity safely. We campaign on behalf of consumers to improve electrical safety regulation and make sure that safety messages are appropriate, up-to-date and well communicated.

For more information about our work, visit:

www.electricalsafetyfirst.org.uk/westminster.



Executive Summary

The STL industry has grown exponentially in recent years – particularly due to the increasing popularity of online ‘peer-to-peer’ accommodation services. However, regulation has not kept pace with this growth.

Whilst there are specific electrical safety provisions enshrined in statute – in relation to both holiday and rented accommodation – **there are no such provisions in relation to STLs**. This means that there is no guarantee that STL properties are electrically safe, with **54% of guests currently experiencing some form of electrical safety issue**.

Our findings show that STLs in England have **fewer electrical safety protections**, when compared with:

- a. Traditional holiday accommodation;
- b. Accommodation in the rented sectors; and
- c. STLs in Scotland.

In order to remedy this and **provide regulatory consistency** to help ensure that STLs are electrically safe, it is essential that, as part of any new licensing scheme, STL hosts in England are required to:

- a. Undertake electrical safety checks at least every five years;
- b. PAT test any electrical appliances provided as part of the STL;
- c. Register with the manufacturer any electrical appliances provided as part of the STL;
- d. Check that no appliance provided as part of the STL is subject to a recall.



54% of guests currently experiencing some form of electrical safety issue.

An STL licence should be conditional on hosts providing evidence of compliance with these measures. **These measures are supported by a significant majority of both STL guests and hosts** – with 92% of guests considering it important that STLs meet formal electrical safety requirementsⁱ and 81% of hosts supporting regular electrical safety checksⁱⁱ.

By introducing these provisions as part of any proposed licencing scheme for STLs, the Government would be ensuring the safety of STLs – allowing hosts to rent with confidence and guests to visit with confidence.

By introducing these measures, the Government would fulfil their commitment of **‘making sure England has high-quality tourist accommodation’**ⁱⁱⁱ. Not to do so would be to undermine the Government’s own findings which show that lower protections for guests in relation to safety regulations is a key concern^{iv}.

Short Term Lets (STLs)

STLs have become increasingly popular. This is due to the growth of the ‘sharing economy’ and the rise of ‘peer-to-peer’ accommodation services including Airbnb, Booking.com, HouseTrip, and HomeAway, which means properties are being used for both residential and commercial purposes.

Indeed, it is estimated that there are 148,000 properties in England that are being used as STLs. This is a figure that has grown and will continue to grow exponentially. For instance, in Cornwall, where STLs are particularly popular, the number of STL listings have increased by 661% in the five years to September 2021^v.



In Cornwall,
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Despite this growth, there is no specific provisions in relation to the safety of STLs. This is a concern that has attracted increased concern – including from the National Fire Chiefs Council^{vi} and the All-Party Parliamentary Group on Tourism^{vii}.

Comparison to other holiday accommodation

All holiday accommodation in England and Wales (including hotels, B&Bs, and STLs) are subject to the Regulatory Reform (Fire Safety) Order 2005^{viii}. The Order requires the Responsible Person to undertake a risk assessment to identify risks (including electrical safety risks) and remove or reduce these risks accordingly^{ix}.

Enforcement of the Order falls to the local Fire and Rescue Service. The FRS has enforcement powers to:

- a. Inspect properties;
- b. Make recommendations; and
- c. Seek legal enforcement of the recommendations^x.

However, the National Fire Chiefs Council (NFCC) has expressed concerns about the application of the Order to STLs^{xi}. This is because FRSs may not know where or how many STLs are operating in England^{xii}. In addition, the nature of STLs as a product of the “sharing economy” means that legislation relating specifically to commercial premises may not be most appropriate.

It, therefore, appears that the existing legislative and regulatory framework is no longer sufficient given the burgeoning sharing economy. This is a view shared by both the NFCC^{xiii} and the All-Party Parliamentary Group on Tourism^{xiv}. The APPG Tourism noted difficulties in enforcing an inspection regime given that regulatory bodies do not know which properties are being let as STLs^{xv}. Instead, they recommend separate sector-specific requirements should be introduced to ensure that both guests and hosts are protected. Given proposals in England

for a licencing scheme^{xvi}, this scheme should include a requirement that hosts undertake an electrical safety check (and associated remedial work) prior to any licence being granted.

This would overcome issues of enforcement by ensuring that STLs can only be advertised once the host has demonstrated compliance with electrical safety provisions.

Comparison to rented accommodation

In determining the specific electrical safety provisions that should be required in STLs, it is useful to make a comparison with rented accommodation.

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 ensures that private tenants are protected by mandatory electrical safety checks at least every five years^{xvii}.

These provisions are to be extended to the Social Rented Sector (SRS), in accordance with Clause 10 of the Social Housing (Regulation) Bill, which is currently before Parliament^{xviii}. This follows a Government commitment, in the Social Housing Charter, which stated that ‘safety measures in the social sector should be in line with the legal protections afforded to private sector tenants^{xix}.

It would, therefore, seem appropriate to introduce similar provisions under an STL licencing scheme to prevent a loophole in the regulatory framework. Indeed, given that a landlord may substitute between renting a property in the PRS and as a STL ensuring that an analogous regulatory regime exists will ensure consistency and reduce the burden on the landlord.

Comparison to Scotland

In Scotland, the Scottish Licensing of Short-Term Lets Order 2022 includes specific provisions in relation to electrical safety^{xx}. This includes a requirement for a competent person to carry out an electrical safety inspection at least every five years – and a similar requirement in relation to PAT testing any appliances provided as part of a STL^{xxi}.

Guests staying in English STLs, therefore, enjoy fewer electrical safety protections when compared with those staying in Scottish STLs. To ensure consistency in electrical safety protections not just with other holiday and rented accommodation but also across the United Kingdom, it is crucial that analogous requirements be introduced in England’s STL sector as part of any licencing scheme.

Product safety

There is a specific concern in relation to product safety and STLs. This is because, unlike with properties in the PRS or SRS, properties made available for STL usually include a full suite of electrical appliances, including white goods, given the nature of the accommodation.

This is especially concerning because nine out of ten (89%) electrical fires are caused by electrical products^{xxii}. This includes products that are likely to be provided as part of an STL, such as:

- Electrical cooking appliances (i.e., cookers and microwaves);
- Laundry appliances (i.e., washing machines and tumble dryers);
- Electrical lighting;
- Portable heaters; and
- TVs^{xxiii}

In total, these products cause almost 12,000 fires and 3,000 injuries a year across the UK^{xxiv}. On this basis, it is vital that the safety of both installations and appliances is accounted for.



Electrical products cause almost **12,000** fires a year across the UK.

Product Registrations and Recalls

It should also, therefore, be a requirement for all products provided with a STL to be registered. This would ensure that where a product is subject to a recall notification or a safety alert, the STL host is made aware.

This would also have the effect of improving the rate of electrical product recalls in the UK. Currently, the success rate of electrical product recalls is worryingly low^{xxv}. When contrasted with the recall rate for cars, where the success rate is 90%, this is concerning given the significant safety risks posed by recalled products.

This low success rate is largely because manufacturers and retailers experience problems tracing consumers where the product has not been registered. Requiring hosts to register products such as white goods provided as part of a STL would address this issue and play a crucial role in protecting guests.

It is worth noting, however, that not all manufacturers allow consumers to register their goods. As such, hosts should also be required to check that the products provided as part of a STL are not subject to a recall.

Portable Appliance Testing (PAT)

It should be a requirement for all appliances provided with the STL to be subject to Portable Appliance Testing (PAT) on a five yearly basis. This would ensure the safety of electrical appliances provided as part of the STL.

Given the number of fires attributable to appliances, this is a practical and straightforward measure that seeks to directly mitigate the risk of electrical fires, ensuring the safety of both guests and the host's property.

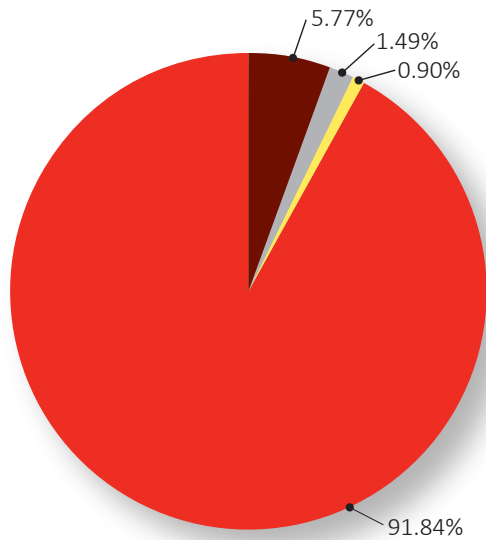
Attitudes of STL Guests

A survey undertaken on behalf of Electrical Safety First found that 9 out of 10 STL guests consider it important that STLs meet formal electrical safety requirements – with 7 out of 10 considering it very important^{xxvi}. The same survey found that the majority (54%) of STL guests had experienced an electrical safety issue whilst staying in a STL property^{xxvii}.



9 out of 10 STL guests think it is important that STLs meet formal electrical safety requirements.

Do you consider it important that STLs meet formal electrical safety requirements?



- Important
- Neither important nor unimportant
- Unimportant
- Don't know



The most common included:

1. Broken sockets or light switches

19% of STL guests had stayed in a property where there were broken sockets or light switches^{xxviii}. This represents a serious hazard and poses a risk of injury to anyone using the installation, meaning that immediate remedial action is required^{xxix}.

2. Damp, condensation or flooding around electrical items

18% of STL guests had experienced damp, condensation or flooding around electrical items^{xxx}. The combination of electricity and water can be potentially fatal, presenting a risk to the safety of STL guests^{xxxi}.

3. Exposed wiring

15% of STL guests had stayed in a property where there was exposed wiring. Exposed wiring represents a very high risk if the conductors are exposed^{xxxii}. Exposed wires transmit electrical current which, when exposed, can even cause electric shocks or fires^{xxxiii}.

4. Scorching/burn marks around sockets or light switches

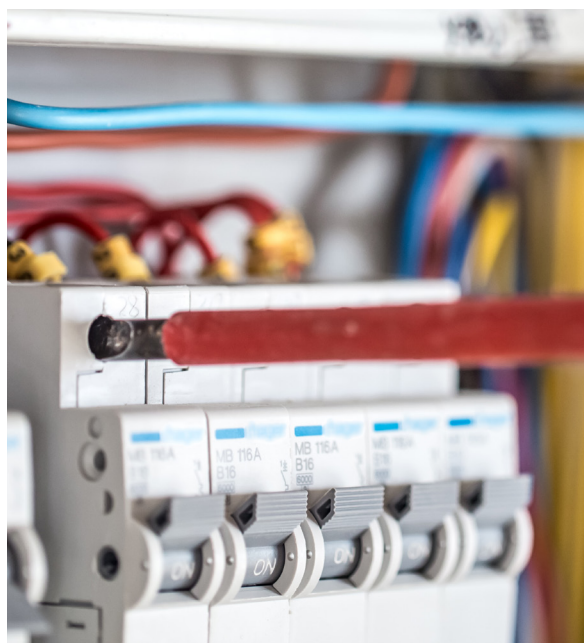
13% of STL guests had stayed in a property where there were scorching or burn marks around the sockets or light switches. This is a sign of overheating which maybe indicative of an overloaded socket or other electrical safety issues, such as a loose connection^{xxxiv}.



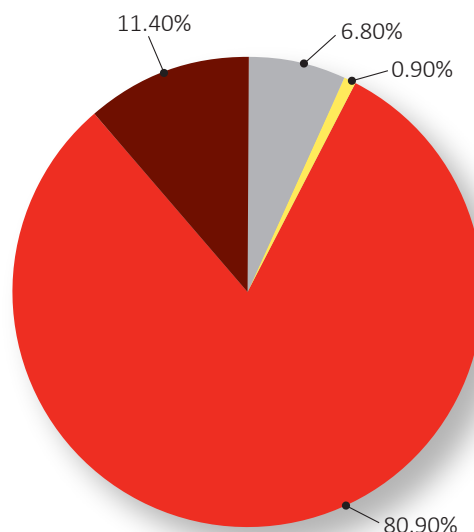
81% of STL hosts would support being required to complete an electrical safety check for their property every five years.

Attitudes of STL Hosts

A survey undertaken for Electrical Safety First found that 81% of STL hosts would support a requirement to be legally required to complete an electrical safety check for their property every five years^{xxxv}. It is, therefore, clear that STL hosts recognise the benefits – both in terms of protecting their property and their guests – of an electrical safety check.



Do you support a requirement for STL landlords to be legally required to complete an electrical safety check of their STL property every five years?



- Support
- Neither support nor oppose
- Oppose
- Don't know

Recommendations

There are already pre-existing or proposed regulatory regimes in relation to holiday accommodation and the rented sectors in England. The same, however, is not true in relation to STLs where 54% of guests currently experience some form of electrical safety issue. This is concerning because the industry has grown (and continues to grow) exponentially. It is, therefore, vital that the Government introduce a robust regulatory regime in relation to STLs, and that this includes specific electrical safety provisions.

In particular, the following recommendations should be adopted:

a. All STLs should be required to have an in-date electrical installation condition report (EICR).

This should be undertaken at least every five years by a qualified and competent electrician. This inspection (and any associated remedial works) should be a condition before a licence is granted. A copy of the latest EICR must be made available to guests on arrival and hosts should have to confirm that their STL is compliant with the requirement prior to the property being listed on any platform.

b. All electrical appliances provided with an STL should be PAT tested.

c. All electrical appliances provided with an STL should be registered with the appliance manufacturer.

This would ensure that hosts are notified if an electrical appliance is subject to any product recall or safety alert, which would protect both STL guests and properties.



d. All electrical appliances provided with an STL should be checked to confirmed these are not subject to a recall.

e. An STL licence should only be granted subject to the host providing the licencing authority with evidence that:

- There is an up-to-date EICR in place – and that there were no reported observations with a Classification Code C1 (danger present) or Classification Code C2 (potentially dangerous) or if any C1 or C2 observations were identified, that the associated remedial works have been undertaken and certificated within a set timeframe.
- There are up-to-date PAT tests for all electrical appliances provided.
- All electrical appliances provided with the STL are registered with the appliance manufacturer.
- All electrical appliances provided with the STL should be checked to confirm these are not subject to a recall.

Endnotes

- i <https://www.gov.uk/government/news/government-launches-review-into-short-term-tourist-accommodation>
- ii <https://www.gov.uk/government/news/government-launches-review-into-short-term-tourist-accommodation>
- iii <https://www.gov.uk/government/news/government-launches-review-into-short-term-tourist-accommodation>
- iv Ibid.
- v https://www.cpre.org.uk/news/new-research-a-huge-rise-in-holiday-lets-is-strangling-rural-communities/?utm_source=HOC+Library+-+Current+awareness+bulletins&utm_campaign=a36d6a5a11-103780030&utm_term=0_f325cbbfcd-a36d6a5a11-103780030&utm_cid=a36d6a5a11&utm_eid=e5d2c85b51
- vi <https://www.nationalfirechiefs.org.uk/News/nfcc-responds-to-fire-safety-concerns-in-short-term-lets>
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- ix Ibid.
- x <https://www.legislation.gov.uk/ukxi/2005/1541/contents/made>
- xi <https://www.nationalfirechiefs.org.uk/News/nfcc-responds-to-fire-safety-concerns-in-short-term-lets>
- xii Ibid.
- xiii Ibid.
- xiv <https://www.ukinbound.org/wp-content/uploads/2018/07/APPG-for-Tourism-Sharing-Economy-Report-Final.pdf>
- xv Ibid.
- xvi <https://www.gov.uk/government/news/government-launches-review-into-short-term-tourist-accommodation>
- xvii <https://www.legislation.gov.uk/ukdsi/2020/9780111191934>
- xviii <https://bills.parliament.uk/publications/46715/documents/1907>
- xix https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936106/The_charter_for_social_housing_residents_-_social_housing_white_paper_large_print.pdf
- xx <https://www.legislation.gov.uk/sdsi/2022/9780111052396/contents>
- xxi Ibid.
- xxii <https://www.electricalsafetyfirst.org.uk/media/1592/fire-factsheet.pdf>
- xxiii Ibid.
- xxiv Ibid.
- xxv [https://fireandelectrical.co.uk/product-recalls-in-the-workplace/#:~:text=The%20Electrical%20Safety%20Council%20\(ESC,just%2010%25%20%E2%80%93%2020%25.](https://fireandelectrical.co.uk/product-recalls-in-the-workplace/#:~:text=The%20Electrical%20Safety%20Council%20(ESC,just%2010%25%20%E2%80%93%2020%25.)
- xxvi <https://www.gov.uk/government/news/government-launches-review-into-short-term-tourist-accommodation>
- xxvii Ibid.
- xxviii Ibid.
- xxix <https://volta.compliance.com/news/eicr-codes-explained-the-meaning-of-c1-c2-and-c3/#:~:text=The%20danger%20poses%20a%20risk,until%20action%20has%20been%20taken.>
- xxx <https://www.gov.uk/government/news/government-launches-review-into-short-term-tourist-accommodation>
- xxxi <https://www.electricalsafetyfirst.org.uk/guidance/advice-for-you/families/#:~:text=DON'T%20put%20drinks%20or,electric%20appliances%20responsibly%20and%20safely.>
- xxxii <https://www.gov.uk/government/news/government-launches-review-into-short-term-tourist-accommodation>
- xxxiii <https://www.tnr.co.uk/how-to-make-live-electrical-wires-safe/>
- xxxiv <https://www.electricalsafetyfirst.org.uk/guidance/safety-around-the-home/overloading-sockets/#:~:text=Check%20regularly%20for%20the%20following,plug%2C%20or%20on%20an%20appliance>
- xxxv <https://www.gov.uk/government/news/government-launches-review-into-short-term-tourist-accommodation>

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