

Health and Safety Policy

This policy sets out Bromford Flagship LiveWest’s approach to health and safety, in support of delivering safe, fair and responsive services to our customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

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| Department | Risk |
| Policy owner | Chief Risk Officer |
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| Date for review | Quarter 1 (April-June 2027) |
| Approving body | BFL Board |
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Purpose/principles

Bromford Flagship LiveWest (BFL) is a group of interconnected companies committed to achieving a safe, healthy and compliant workplace while maintaining quality and protecting the environment. These objectives are achieved through the integration of health and safety risk management into daily business decisions and operational delivery.

BFL recognises the diverse and complex range of health and safety risks that arise from the services delivered across the Group, many of which are undertaken within the communities we serve and directly impact colleagues, contractors, customers and members of the public.

While robust management systems are essential, BFL acknowledges that effective health and safety management cannot be delivered in isolation. We work collaboratively with supply chain partners, contractors, regulators and stakeholders where duties and responsibilities interface and overlap.

Scope

The scope of this policy applies to all colleagues, contractors, managing agents and other relevant persons, including the safety of customers in their homes and the safeguarding of vulnerable persons and relates to all directorate activities within the group and associated legal entities. This includes provision of homes that are safe, warm and compliant for our customers, the building of new homes via our in-house developer (Bromford Development Ltd), the maintenance, improvement and repair of existing homes, the provision of housing management and support services and all other corporate services.

Each subsidiary company retains responsibility for identifying, assessing and controlling its own operational health and safety risks through local arrangements that align with this overarching Group framework.

Roles/responsibilities

Board and Committees

The Board has overarching responsibility for risk management and accountability for both colleague and customer health and safety. The Board reviews health and safety performance on a regular basis, including landlord compliance, to ensure that safety is being managed effectively..

The Audit and Risk Committee oversees the effectiveness of the organisation's health and safety controls on behalf of the Board, including the review of regular group health and safety risk and performance reports.

The Board has delegated accountability for overall strategic and operational management for health and safety to the Chief Executive.

The Board is responsible for:

- actively reviewing and approving the health and safety policy, ensuring it is proportionate, legally compliant and applicable across the organisation
- monitoring compliance with the health and safety management system and all associated policies, procedures and statutory duties
- demonstrating its commitment, collectively and individually, to effective health and safety risk control through visible leadership and appropriate challenge
- actively promoting a positive safety culture and setting a clear example to colleagues, contractors and partners
- ensuring that all Board decisions properly consider health, safety and welfare implications and associated risks
- ensuring the appointment of competent persons to provide professional advice on health, safety and welfare matters and to support the effective discharge of legal responsibilities
- ensuring that adequate financial, human and technical resources are provided to establish, maintain and continuously improve a robust health and safety management system
- agreeing the organisation's safety, health and welfare strategy, targets and objectives, and monitoring progress against them
- reviewing health and safety performance, significant incidents, audit findings and compliance failures, and ensuring that appropriate corrective and preventative actions are taken
- seeking assurance that statutory landlord safety obligations (including gas, electrical, fire, asbestos, water hygiene and lift safety) are fully met and that risks to customers, colleagues and the public are effectively controlled

Chief Executive

The Chief Executive has the delegated authority for all strategic health and safety management. The Chief Executive also has overall responsibility for the acts and omissions of colleagues which may affect the health and safety of customers and other users of the organisation's services.

The Chief Executive will be supported in this duty by competent persons, including the Executive Team, and the Health and Safety Team.

The Chief Executive will actively promote a culture of 'Safety First' throughout the organisation and will ensure that health, safety, welfare and wellbeing are standing priorities at all leadership forums and key decision-making meetings.

The Chief Executive will formally report on health and safety performance, compliance and significant issues to the Board at least annually, and will escalate and discuss any immediate, serious or high-level risks as required.

The Chief Executive will review, formally approve, sign and actively promote the Health and Safety Policy on an annual basis.

The Chief Executive is responsible for:

- the strategic delivery of the Health and Safety Policy and related arrangements in line with organisational aims, objectives and statutory duties
- the appointment of key duty holders and accountable persons as required by health and safety legislation and/or the Regulator of Social Housing
- the promotion and maintenance of a strong, positive and proactive health and safety culture across the organisation
- providing visible leadership on all health and safety matters and ensuring that health and safety expectations are clearly communicated and consistently applied
- ensuring that adequate financial, human and technical resources are made available for the effective implementation of health and safety arrangements and the control of risk
- seeking assurance that appropriate systems are in place to identify, manage and monitor health and safety risks, including landlord compliance and customer safety

Chief Risk Officer (CRO)

The CRO is appointed by the Chief Executive as the organisation's Health and Safety Lead, as required under Section 10 of the Social Housing (Regulation) Act 2023. The CRO will also lead on occupational health and safety matters in accordance with the Health and Safety at Work etc. Act 1974 and related legislation.

The CRO will:

- monitor the organisation's compliance with all relevant health and safety requirements
- assess the risks of actual or potential failure to comply with health and safety requirements
- notify the responsible body of the provider of:
 - any assessed material risks of non-compliance with health and safety requirements
 - any material failures to comply with health and safety requirements
- provide timely, clear and proportionate advice to the responsible body on how the provider should address risks and failures notified, for the purpose of ensuring ongoing and effective compliance with health and safety requirements.
- support the embedding of effective health and safety governance, risk management and assurance arrangements across the organisation
- deputise for the Chief Executive on health and safety matters as required, including during their absence
- ensure that health, safety, welfare and wellbeing are a standing priority on all relevant organisational agendas and are fully embedded and effectively implemented across all directorates.

- ensure that a robust and structured audit framework is in place to provide effective assurance to the Executive Team and Board, with a clear focus on continuous improvement
- secure the engagement, cooperation and appropriate resourcing of all relevant teams across the organisation to embed effective health and safety management and to provide assurance to the Executive Team and Board
- promote the Health and Safety Policy and ensure that outcomes, actions and decisions taken by relevant health and safety and assurance groups are effectively communicated to colleagues and other interested parties
- ensure that effective arrangements are in place for all colleagues to be made aware of the Health and Safety Policy
- receive appropriate information, instruction, training, supervision and support
- monitor and report on the effectiveness of the Health and Safety Policy and associated arrangements and prepare an annual health and safety performance and assurance report for the Board
- ensure that material health and safety risks within their areas of responsibility are identified, managed, escalated and controlled in accordance with organisational arrangements

Executive Team

The Executive team are responsible for the overall health and safety management within their respective business areas. This includes ensuring appropriate controls are in place for, but is not limited to, property compliance, housing management, maintenance and refurbishment, supported and sheltered housing services, community development, customer engagement, property development, home ownership sales, managing agents and management companies, and business support services. They have overall accountability for ensuring that these services and activities are delivered in a manner that protects the health, safety, welfare and wellbeing of colleagues, visitors, customers, and contractors.

They will exercise managerial control by:

- promoting the Health and Safety Policy within their areas of responsibility and ensuring that managers discharge their health and safety responsibilities effectively
- ensuring that the Audit Framework is fully embedded, supported, and consistently applied throughout their areas of responsibility
- fostering and maintaining a positive safety culture within their teams, ensuring that health and safety is prioritised in all operational decisions, including activities undertaken by contractors, customers and other third-party stakeholders within their areas or remit
- providing appropriate support and resources to managers, ensuring that they have the capacity, knowledge, and formal arrangements to implement the Health and Safety Policy and review health and safety issues regularly, at least quarterly

- engaging with the organisation’s health and safety team to support initiatives, provide guidance, and ensure teams operate in line with the Health and Safety Policy and legal requirements
- identifying opportunities for continual improvement within the Audit Framework and implementing improvements where necessary
- monitoring and reviewing relevant health and safety issues affecting their service areas, including legislative and regulatory changes, assessing the implications for the organisation, making recommendations for action, and ensuring implementation
- Ensuring that risk assessments are undertaken for activities and services within their areas and that these assessments are reviewed whenever there are significant changes to working practices, service delivery methods, personnel, customers, the environment, or knowledge
- Actively participating in relevant assurance groups and ensuring that follow-up actions from these forums are implemented promptly and effectively

Group Head of Health and Safety

The Group Head of Health and Safety is responsible for ensuring that health and safety risk assessment and management processes are effectively implemented across BFL through promoting a positive culture of compliance and transparency against health and safety risk. They support the CRO in providing challenge to the Executive’s strategic risk planning and provide assurance to both the Executive and the Board on the effectiveness of health and safety management and the organisation’s risk exposure. The health and safety function also plays an active role in supporting the CRO in meeting legal and regulatory reporting obligations, providing project assurance, and identifying practical risk control solutions.

The key responsibilities of the Group Head of Health and Safety are to:

- act as the competent person for health and safety within the organisation as required by the Management of Health and Safety at Work Regulations 1999
- act as the subject matter expert on all health and safety matters, fostering a supportive culture of continual improvement across the organisation
- provide regular and ad-hoc health and safety performance reporting to our executive team and Board as required through our governance and assurance frameworks
- serve as the focal point for health and safety matters, coordinating with directors, service leaders, and other colleagues to implement the Health and Safety Policy, Organisation, and Arrangements
- ensure that records of injuries, diseases, dangerous occurrences, and near misses are maintained, that incidents are investigated, corrective actions are implemented, trends are monitored, and RIDDOR notifications are made to the Health and Safety Executive (HSE) where required
- monitor and respond to changes in health and safety legislation and guidance, assess the impact on the organisation, revise relevant policies and procedures, and communicate updates to key stakeholders.

- identify occupational health and safety management objectives to be completed in order to ensure continuous improvement
- support the CRO by leading on our principal risk for health and safety, by providing regular updates and by monitoring and updating controls assigned against the overarching principal risk for health and safety
- ensure workforce involvement in health, safety, and welfare consultation and communication, and maintain records of such engagement
- support the Audit Framework and provide assurance to the organisation that all safety-related activities operate within our risk appetite framework, ensuring no unmanaged risks arise from these activities
- ensure that regular health and safety inspections of workplaces are undertaken, recorded, and reported
- arrange and agree the assurance framework annual plan of checks against health and safety arrangements and compliance, ensuring that all required corrective actions are implemented within agreed timescales
- ensure there is sufficient resource and budget to maintain or procure all necessary health and safety information, advice, and external assurance or accreditation to reflect the needs of the business, ensuring reporting mechanisms are established, maintained, and presented at all relevant forums
- coordinate with other teams to ensure essential information is provided promptly
- work collaboratively with all businesses across the group to provide guidance, support, and practical solutions in line with the Health and Safety Policy and statutory obligations

Health and Safety Team

The Health and Safety Teams collectively act as the Competent Persons under the leadership of the Group Head of Health and Safety. They provide expert advice and internal consultancy services to ensure the organisation complies with legal requirements and best practice. While the primary focus is health and safety at work, the team also provides advice or sources specialist guidance on other health and safety matters, including compliance, as required.

The Key Responsibilities of the Health and Safety Team are to:

- oversee, manage, and maintain the Health and Safety Management System to ensure its effectiveness and alignment with organisational objectives
- support the embedding of a positive health and safety culture throughout the organisation
- develop, maintain, and update documentation and relevant systems to ensure effective delivery of the Health and Safety Management System
- engage colleagues in the development and promotion of control measures to safeguard the health and safety of colleagues, customers, and contractors

- work collaboratively with teams across the organisation to develop, promote, and continually improve safety control measures
- investigate incidents, near misses, and dangerous occurrences, or provide guidance and support to managers to ensure thorough investigations
- submit reports to relevant enforcement bodies under RIDDOR when required or as directed by the Group Head of Health and Safety
- attend and provide expert advice at meetings, including chairing operational health and safety meetings as required
- provide statistics, trend analysis, and reporting to inform organisational decisions and direct resources effectively to minimise risk
- maintain accurate health and safety records to meet business objectives, statutory obligations, and regulatory requirements
- ensure regular health and safety inspections of workplaces and work sites occupied by colleagues, customers, or contractors, reporting results to management and supporting the implementation of required improvements
- participate in, or submit items to, assurance group meetings as requested to provide assurance and expert insight into health and safety performance

Senior Leaders/Leaders/Managers

Every senior leader is responsible for managing all aspects of health and safety relating to their colleagues and the activities undertaken by their teams.

Senior Leaders are responsible for:

- creating and promoting a culture of health and safety awareness within their team or location, enabling colleagues to raise concerns and ensuring health and safety issues are discussed regularly at team meetings
- implementing the Health and Safety Policy, Organisation, and Arrangements within their area of responsibility, communicating relevant health and safety matters, resolving issues on a day-to-day basis, or escalating them as appropriate
- ensuring that all activities within their area operate in accordance with the Health and Safety Policy and the Audit Framework, identifying opportunities for continual improvement, and communicating these to the Health and Safety Team
- embedding a positive safety culture within their teams and promoting safe working practices
- engaging the Health and Safety Team to support initiatives, provide guidance, and ensure compliance with organisational health and safety requirements
- ensuring that health and safety policies, procedures, and arrangements are properly explained to all new colleagues, including temporary and agency staff, during induction, and that relevant records are maintained

- providing colleagues with appropriate training, support, and guidance in safe working practices relevant to their role, observing work practices, and intervening to correct unsafe behaviours where necessary
- conducting risk assessments for activities undertaken by or affecting their teams, including Control of Substances Hazardous to Health (COSHH) assessments, and ensuring appropriate action is taken to eliminate or minimise risks. Reviewing risk assessments with colleagues regularly and maintaining accurate records
- ensuring that local procedures for protecting colleagues' personal safety whether in offices, on site visits, during fieldwork, or on housing schemes are in place, understood, and followed
- encouraging the reporting of incidents, near misses, and dangerous occurrences; recording and investigating these; and taking appropriate follow-up action with support from the Health and Safety Team as required
- designing and implementing working practices in line with the hierarchy of control to minimise risk
- issuing colleagues with necessary Personal Protective Equipment (PPE), providing instruction on its use, and taking appropriate action when PPE or health and safety procedures are not followed
- identifying signs of stress or other wellbeing issues among colleagues, taking steps to mitigate risks, and seeking advice from the Health and Safety or People Services teams where necessary
- ensuring that all visitors, and where appropriate customers, are aware of and comply with relevant health and safety procedures
- ensuring that health and safety responsibilities are clearly defined in contracts for services under their control (e.g., maintenance, cleaning, management, procurement), that these responsibilities are understood by all parties, and that monitoring arrangements are in place
- implementing the Health and Safety Management System and integrating relevant risk mitigation strategies into business delivery plans
- monitoring compliance with health and safety policies, procedures, and guidance within their Directorate or team
- escalating significant risks or safety concerns to their Chief Officer, Risk and Disclosure Committee, Chief Risk Officer, or Senior Health and Safety Leads
- considering health and safety risks when making strategic business decisions
- monitoring the organisation's Safety Management System through Directorate Management Team meetings
- conducting lessons learned reviews for serious incidents, including all RIDDOR and gas-related incidents, and ensuring corrective actions are implemented

Colleagues

Every colleague is responsible for:

- taking reasonable care for their own health and safety, and for the health and safety of others who may be affected by their acts or omissions at work
- not intentionally interfering with or misusing anything provided in the interests of health and safety
- familiarising themselves with the Health and Safety Policy, Organisation and Arrangements, and any other policies, procedures, or guidance relevant to their role.
- remaining up to date with H&S training and completion of mandatory training as required
- maintaining a positive safety culture in all activities and promoting safe working practices
- cooperating with management on all health and safety matters, complying with reasonable instructions, and observing health and safety procedures, guidance, and safe systems of work
- reporting hazards, risks, defects, incidents, near misses, dangerous occurrences, or ill health promptly to their line manager, and escalating to the Health and Safety Team if issues are not resolved in a reasonable timeframe
- wearing and using Personal Protective Equipment (PPE) correctly as required by risk assessments
- maintaining any equipment provided for health and safety purposes in good condition and reporting any defects
- using information, instruction, and training appropriately and not undertaking tasks for which they have not received the necessary authorisation, instruction, or training
- taking ownership of safety hazards in their workplace, including where customers live and how services are delivered, and actively contributing to identifying and implementing improvements
- discussing with their managers any situations where they perceive shortfalls in safety or wellbeing and making suggestions for improvement
- applying the organisation's values and behaviours in all aspects of their work, including safety and wellbeing
- carrying out their work in accordance with the Health and Safety Policy, associated procedures, risk assessments, and safe systems of work

Policy content

Key legal influences

BFL recognises the wide range of legislative requirements applicable to its work and the service areas it supports, the primary legislation associated with this Management System Principle.

A complete listing of legislative requirements relating to management of health and safety will be maintained on an electronic legal risk register. We will map out our legal

responsibilities and compliance, which will be planned and/or reviewed within the group's annual targets and objectives. This register also identifies the roles who hold duties as accountable, responsible, or consulted persons with respect to its application.

Model and approach to the Health and Safety Policy arrangements

The respective overarching arrangements provides the model and explanation how each business within BFL will set their model on plan, do, check, act, while meeting legal compliance through their legal risk register and processes and procedures, to evaluate compliance and develop an integrated management system.

The policy is supported by three sets of health and safety arrangements:

- Health and Safety Management Procedure for **Bromford**
- Health & Safety Manual (FG-SMS-020) for **Flagship**
- Health and Safety Policy Arrangements for **LiveWest**

The individual business arrangements form a suite of operational topic-based procedures for colleagues working in the respective organisations. Collectively these procedures form our health and safety arrangements for the business and will advise leaders and colleagues on how we deliver our services both safely and in line with current legislation.

Details of the arrangements are presented in a format that reflects the principles of the Plan, Do, Check, Act (PDCA) approach. The cycle is designed to ensure the consideration of planning, implementation, monitoring and then review of work activities, to ensure safe working practices throughout group and encourage a learning approach. The cycle is designed to be repeated to ensure continuous improvement. This mirrors the approach advocated in both the HSE guidance Managing for Health and Safety; HSG65 and the ISO 45001.

Assurance Framework

BFL operates a structured Health and Safety Assurance Framework to provide confidence that risks are effectively controlled, and statutory duties are met. The Group maintains zero tolerance for material safety failings and is committed to proactive risk management and continuous improvement:

Board and Executive Team

The Group Board forms the ultimate governance layer within the organisation's health and safety management arrangements. It receives updates at every Board meeting, including key risk metrics and details of material or significant health and safety findings reported by the Executive Team. The Board also formally reviews and approves the Health and Safety Policy Statement on an annual basis to ensure it remains fit for purpose and aligned with regulatory requirements and best practice. Customer Committee has delegated responsibility for the approval of the BFL Landlord Compliance Policy

To strengthen oversight, the Board appoints a non-executive member as the Health and Safety lead. This role ensures that reporting provided by the business is suitable for Board review and comprehensively covers statutory and regulatory obligations.

The Executive Team and subsidiary Boards receive regular updates on key health and safety risk metrics and material or significant findings relating to both colleagues and customers. These reports enable the Executive to monitor performance, assess risk exposure, and ensure that adequate resources are allocated to maintain health and safety standards within the organisation's defined risk appetite. The Board will receive an annual health and safety and customer safeguarding assurance report.

Through this structured reporting and oversight, the Board and Executive Team provide assurance that health and safety management remains effective, compliant, and continuously improving across all parts of the organisation.

Audit & Risk Committee (ARC)

The ARC forms an integral part of the organisation's health and safety management arrangements, providing independent oversight and assurance to the Board. ARC ensures that the Health and Safety Policy, management systems, and associated controls are effective, robust, and aligned with organisational objectives.

ARC will receive regular updates on health and safety risks and controls, enabling scrutiny of the overall effectiveness of the health and safety management system. The Committee provides oversight of material areas for improvement in the management and delivery of health and safety across the organisation, ensuring that any issues identified are addressed and that continuous improvement is embedded.

In addition, ARC reviews the Health and Safety Policy prior to Board approval, ensuring that it meets statutory requirements, best practice standards, and the organisation's strategic objectives. Through this oversight, ARC supports the Board in maintaining effective governance, risk management, and assurance in relation to health and safety.

Executive Risk and Disclosure Committee (ERDC)

The ERDC forms a key component of the organisation's health and safety governance and assurance framework. It reports to the ARC and the Executive Team, providing strategic oversight of health and safety management across the organisation.

The ERDC is responsible for establishing the Health and Safety Policy and maintaining a comprehensive compliance framework to ensure legal, regulatory, and organisational obligations are met. It oversees the planning and implementation of the Health and Safety Management System through risk profiling and an agreed delivery plan, ensuring that required risk controls are identified and that adequate resources are allocated for effective implementation.

Additionally, the ERDC monitors the effectiveness of the Health and Safety Management System, evaluating compliance with legal requirements and organisational standards, and ensuring that improvements and corrective actions are implemented where necessary.

Through these arrangements, the ERDC provides assurance to the Executive Team and ARC that health and safety is strategically managed, risks are mitigated, and organisational objectives are achieved safely and sustainably.

Compliance Safety Groups

Compliance Safety Groups form a key part of the organisation's health and safety management arrangements, providing day-to-day oversight of landlord compliance and operational health and safety. They ensure that proper arrangements for risk management, internal control, and operational safety are established, maintained, and embedded across relevant areas of the business.

These groups provide structured oversight of performance, reviewing progress against agreed targets and monitoring the effectiveness of forward action plans. They manage escalations and direct operational work to ensure that health and safety standards are consistently achieved, and that risks are identified, controlled, and mitigated appropriately.

Compliance Safety Groups also support the ERDC, Executive Team, Board, and ARC in discharging their governance responsibilities. This includes providing assurance that risk management, internal controls, and governance arrangements are adequate, effective, and continuously improved in line with organisational requirements.

Compliance monitoring

Leaders will provide assurance on the application of this policy within their teams on an annual basis through the Leadership Self-Assessment process. This process is designed to review how legislation and regulations, including health and safety principles, are embedded in practice, identify areas for improvement, and support continuous enhancement of safety culture and risk management across the organisation.

BFL will produce an annual Health and Safety Compliance Statement and undergo periodic independent reviews to provide assurance that the organisation is effectively applying the principles of this policy and maintaining robust health and safety management.

The Health and Safety Team will operate within agreed Key Performance Indicators (KPIs) and Key Risk Indicators (KRIs), providing regular assurance through monthly reporting to the Executive Team, ERDC, and regular reporting to ARC. These reports will highlight performance, trends, emerging risks, and opportunities for improvement to ensure the organisation continuously strengthens its health and safety arrangements.

EIA statement

An Equality Impact Assessment (EIA) has been completed for this policy. The EIA ensures that the policy is fair, inclusive, and does not negatively impact any protected groups under the Equality Act 2010. The outcomes of the assessment will be monitored, and actions taken where needed to promote equity.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

Training statement

We will commit to demonstrating a sufficient level of skill, knowledge and aptitude that shows we can provide good quality advice and services to our customers. Competence will be detailed through our process and procedure documentation and remain under continuous review to ensure we provide our services safely and by suitably trained colleagues.

Review period

This policy will be reviewed annually during quarter 1 period (April – June) or sooner if changes are made to organisational structure, responsibilities or assurance or regulatory or legislative arrangements. The policy is approved by Bromford Flagship LiveWest Board.

Approval

This Policy was approved by the BFL Board and is applicable to:

- Bromford Flagship LiveWest Ltd
- Bromford Housing Association Ltd (operating as Bromford)
- Bromford Home Ownership Ltd (operating as Bromford)
- Merlin Housing Society Ltd (operating as Bromford)
- Flagship Housing Limited (operating as Flagship) and the following housing divisions: Samphire Homes, Victory Homes, Newtide Homes
- LiveWest Homes Ltd (operating as LiveWest)

Any references to Bromford Flagship LiveWest should be interpreted as equally applicable to all the above.