

# Bromford Flagship

## Health and Safety Policy

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### Policy Statement & Purpose

Health and safety plays a key part in contributing to our success whether this is for our colleagues' safety or the safety of our customers living in our homes or using our services. Bromford Flagship including its subsidiaries, is a place where safety is a priority and where it contributes to, rather than a barrier of, achieving success. This policy has been created to demonstrate the organisations commitment to safeguarding the health, safety and welfare of all colleagues and discharge its duties under the Health & Safety at Work, etc. Act 1974.

Health and safety risks will be managed and aligned to our overall business risk and controls assurance framework, our risk appetite is **averse** for health and safety risks. Collectively we are committed to ensuring the health, safety and wellbeing of our colleagues, customers and others who may be affected by our work activities. We are fully committed to the prevention of injury and ill health with continual improvement in safety performance. We are also committed to achieving all relevant regulatory, legal and best practice standards within our sector.

This document sets out our strategic health and safety management system including responsibilities, arrangements, and our assurance framework. It includes oversight and assurance at Executive and \*Board level.

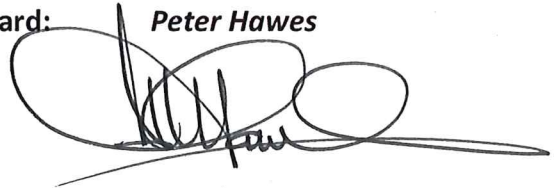
Chief Executive: **Robert Nettleton**

Chair of Board: **Peter Hawes**

Signature:



Signature:



Date:

28<sup>th</sup> February 2025

Date:

28<sup>th</sup> February 2025

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### 1. Scope

The scope of this policy applies to all colleagues and relates to all directorate activities within Bromford Flagship Ltd and associated legal entities unless stipulated below. This includes provision of homes that are safe, warm and compliant for our customers, the building of new

*\* References to "the Board" in this document and our governance arrangements mean a) the coterminous Board acting as the Boards of Bromford Flagship Limited (BFL), Bromford Housing Association Limited (BHA), Flagship Housing Limited (FHL), Merlin Housing Society Limited (MHS) and Bromford Home Ownership Limited (BHO) and b) separately, the Board of Bromford Developments Ltd.*

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homes via our in-house developer, Bromford Developments Ltd, the maintenance, improvement and repair of existing homes, the provision of housing management and support services and all other corporate services.

This policy does not cover:

- Gasway Ltd

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## 2. Reference Documents – Health and Safety Arrangements

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

- The Health and Safety Management Procedure for legacy Bromford, and
- Health & Safety Manual (FG-SMS-020) for legacy Flagship.

Both sets of arrangements form a suite of operational topic-based procedures for colleagues working in the respective legacy 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.

List of Referenced Documents
Health and Safety Management Procedure
Health & Safety Manual (FG-SMS-020)
Bromford Flagship Legal Register

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## 3. Principles

Bromford Flagship believes that the management of Health and Safety is an integral part of all its business activities. We will comply with the standards set by the HSE through the Health and Safety at Work etc Act 1974 and the Regulator of Social Housing through the relevant consumer standards, and all other relevant statutory provisions applicable to our activities, detailed in our legal register; we will also:

- Develop arrangements to prevent, so far as is reasonably practicable, injury, ill-health and damage as a consequence of its undertakings and in accordance with our risk appetite framework.
  - Provide and maintain, so far as is reasonably practicable, a safe and healthy working environment, and enlist the support of our colleagues, service providers and other interested parties in achieving these ends.
  - Provide and maintain plant, machinery and systems of work that are, so far as is reasonably practicable, safe and without risk to health.
  - Ensure that assessments of the risks to people arising from our activities are undertaken and that the appropriate control measures are implemented to manage these risks.
  - Provide suitable information, instruction, training and supervision as necessary to ensure the Health and Safety at work of all colleagues.
  - Allocate sufficient resources to enable the Health and Safety Policy and its arrangements to be effectively implemented.
  - Consult with and maintain good relations with colleagues, trade union representatives, and enforcing authorities, local authorities and other relevant organisations.
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- Regularly report to our Executive Team and Board through the reporting framework on key H&S risk indicators linked to our tolerances and significant incidents and material findings requiring their scrutiny.
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#### 4. Responsibilities

**Our Board** has overarching responsibility for risk management and accountability for both colleague and customer health and safety. The Board reviews health and safety performance monthly, including landlord compliance, to ensure safety is being managed effectively. Our Board will nominate a non-executive member to have specific H&S oversight.

The Audit and Risk Committee oversees the effectiveness of our controls on behalf of the Board, including reviewing quarterly health and safety reports.

The Board has delegated overall strategic and operational accountability for health and safety to the chief executive.

**Our CEO** has the delegated authority for strategic health and safety management. The CEO will delegate relevant and appropriate accountability and responsibility to their C-Suite as per Appendix 1 – Health and Safety Policy RACI and collectively the C-Suite will be responsible for:

- Strategic delivery of the health and safety policy and health and safety arrangements in accordance with organisational aims and objectives.
- The appointment of key duty holders and accountable persons as required by legislation and/or the Regulator for Social Housing.
- Promotion of a strong and positive health and safety culture.
- Visible leadership on all health and safety matters, and
- Adequate resourcing of risk control measures to allow for effective risk mitigation.

**Our Chief Risk Officer** is appointed by our CEO to be our health and safety lead as required under section 10 of the Social Housing (Regulation) Act 2023 and will lead on occupational health and safety as required under the Health and Safety at Work Act, etc. 1974. They will:

- monitor our compliance with health and safety requirements.
- assess risks of failure to comply with health and safety requirements.
- notify the responsible body of the provider of—
  - risks assessed material failures by the provider to comply with health and safety requirements;
  - material failures by the provider to comply with health and safety requirements;
- provide advice to the responsible body as to how the provider should address risks and failures notified to the responsible body for the purpose of ensuring that the provider complies with health and safety requirements.

**Our Health and Safety Teams** will facilitate health & safety risk assessment and management processes across Bromford Flagship, supporting the Chief Risk Officer in providing challenge to the Executive's strategic risk planning, and providing assurance to both the Executive and the Board on the effectiveness and risks to our health & safety. The health & safety function will also play an active role in supporting the CRO in delivering on legal and regulatory reporting and providing both challenge and project assurance and helping to identify practical control solutions.

**Senior leaders** will be responsible for the following in relation to their management portfolio:

- Implementation of the health and safety management system and incorporation of relevant risk mitigation strategies into business delivery plans.
  - Monitoring of the implementation and compliance of health and safety policies, procedures and how to guides within their management Directorate/Team.
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- Escalation of significant areas of risk to their Chief Officer, Disclosure Committee, Chief Risk Officer and/or Senior Health and Safety Leads
  - Consideration of relevant health and safety risks when making strategic business decisions.
  - Monitoring of the organisational safety management system through the Directorate Management Team meetings, and
  - Conducting lessons learned meetings for serious incidents including all RIDDOR and gas related incidents.

**All leaders**, in relation to their management portfolio, will be responsible for:

- Implementation of relevant health and safety topic-based procedures
- The completion of risk assessments in relation to all identified hazardous activities and that relevant risk control measures are applied and regularly reviewed.
- Ensuring their teams, including any temporary workers, are competent to carry out their roles safely through the provision of adequate information, instruction, training and supervision.
- The provision and maintenance of tools, equipment and systems of work that are safe and without risks to health.
- Communication and consultation with their teams on the introduction of any measures which may affect their health and safety.
- Maintaining all relevant documentation and records that relate to the health and safety management system.
- Establishing appropriate emergency procedures to be followed in the event of serious and imminent danger, and
- Ensuring health and safety is robustly considered and evaluated within the procurement of any contracts for services, including all Construction, Design and Management (CDM) activities, ensuring compliance with our procurement frameworks and health and safety procedures linked to suppliers and contractors.

**Every colleague** will have a part to play in maintaining and improving our culture towards H&S, a safe and healthy workplace and in providing customers with services that will not adversely or negatively impact on their health, safety or wellbeing. We all need to be aware of our health and safety responsibility which will include:

- Always taking reasonable care of their own health and safety and considering the safety of other people who may be affected by our acts or omissions.
  - Immediately reporting in accordance with our incident and near miss reporting procedures any incidents, hazards, defects or dangerous occurrences that may compromise the health, safety or welfare of colleagues, customers or contractors.
  - Using personal protective equipment (PPE) as required through risk assessment.
  - Refraining from the misuse or interference of any work equipment or anything that has been provided for health and safety purposes.
  - Working in accordance with information, instruction and training and not undertaking tasks for which authorisation and/or training has not been provided.
  - Carrying out our work in line with this policy and any associated procedures, risk assessment or safe system of work.
  - Taking ownership of any safety hazards identified in our workplaces, where our customers live and how our services are delivered.
  - Discussing with their leaders any activity where they feel there are shortfalls in safety and wellbeing and actively suggesting improvements, and
  - The application of our values and behaviours (DNA and Core Competencies) in everything we do.
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## 5. Competence and Training:

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.

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## 6. Legislative or Regulatory Requirements

Bromford Flagship Group will maintain a Health and Safety Legislation register to record the applicable primary and secondary law which applies to the organisation and our business activities. This register also identifies the roles who hold duties as accountable, responsible, or consulted persons with respect to its application (**Appendix 2 Legislation Register (RACI)**).

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## 7. Assurance Framework

Our risk appetite is **averse** for health and safety risks. We have zero tolerance for actions or omissions that could compromise the health and safety of individuals affected by our operations. We are committed to upholding the highest standards of health and safety compliance, proactively identifying and mitigating risks, and fostering a culture of safety throughout the organisation.

### Group Board

Our group Board will receive H&S updates at every meeting, including key risk metrics and details of material or significant findings from our Executive Team. The Board is also responsible for reviewing and approving the Health and Safety Policy Statement annually.

The Group Board will appoint a member of the non-executive team as a Health and Safety lead, ensuring the reporting provided by the business for Board review is suitable and covers regulatory requirements.

### Executive Team

Our Executive team will receive monthly updates in the form of key risk metrics and material or significant findings relating to both colleague and customer health and safety. The team will review these reports and ensure suitable and adequate resources are provided to ensure the health and safety of customers and colleagues remains within our risk appetite.

### Audit & Risk Committee (ARC)

ARC will report to the Board and will be responsible for:

- Reviewing the health and safety policy prior to it being approved.
- Receiving a quarterly health and safety management assurance report.
- Scrutiny of the effectiveness of the overall health and safety management system.
- Oversight of key areas for improvement in business management of the health and safety management system, where identified.

### Disclosure Committee

The Disclosure Committee will report to ARC and the Executive team and will be responsible for strategic H&S management oversight and review including:

- Establishing the Policy and general compliance framework for the management of health and safety.
  - Planning for the implementation of the health and safety management system through risk profiling and agreed delivery plan.
  - Identifying required risk controls and providing adequate resources for the implementation of the health and safety management system.
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- Checking the effectiveness of the various elements of the health and safety management system and evaluating compliance to legal requirements.

### Compliance Groups

Our Compliance Groups will be responsible for the day-to-day oversight of all areas of landlord compliance and health and safety. Their key responsibilities will include:

- Performance oversight and agreeing forward action plans.
- Managing escalations and directing work to deliver target level performance.
- Maintaining and monitoring proper arrangements for risk management and internal control, and
- Ensuring these are effectively developed, implemented, managed, monitored and embedded
- Support the Disclosure Committee, Executive, Board and Audit & Risk Committee (ARC) in discharging their responsibilities for ensuring the adequacy and effectiveness of risk management, control and governance across Bromford.

### Compliance Monitoring

Leaders will be asked to confirm that their teams are complying with the principles of this policy on an annual basis through the Leadership Self-Assessment process.

We will produce an annual compliance statement and have periodic independent reviews to confirm that we follow the policy principles.

The Health and Safety Team will comply with KPIs and KRIs as set out by the Exec and will report on this monthly and quarterly to Exec, RCF and ARC,

This policy will be reviewed every year or sooner if changes are made to organisational structure, responsibilities or assurance or regulatory arrangements

## 8. Document Details

**Owner:** Heather Richardson- Chief Risk Officer  
**Approved By:** Bromford Flagship Board  
**Date of Approval:** 28<sup>th</sup> February 2025  
**Next Review Due:** 28<sup>th</sup> February 2026  
**Policy Version:** 1.0

### Version Control

Renewal Date	Version	Approved By	Comments