

Compliance Safety Policy

This policy sets out Bromford Flagship LiveWest’s approach to Compliance 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.

Department	Operations
Policy owner	Paul Coates (Chief Customer Officer, Bromford-Flagship) and Suzanne Brown (Executive Director of Operations, LiveWest)
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Approving body	Customer Committee
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Purpose/principles

Bromford Flagship LiveWest (BFL) is committed to delivering safe, fair and responsive services to our customers’ homes and 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. We maintain a cautious, averse risk appetite in all compliance safety matters.

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.

The purpose of this policy and associated documents is to ensure that BFL comply with statutory, legislative and regulatory standards and are committed to consistently delivering robust, safe, efficient and cost-effective service to our customers which meet regulatory and legal requirements, for our existing and new homes.

This umbrella policy for compliance safety services aims to achieve the following:

- safe homes, communal areas and estates for our customers and a safe working environment for our colleagues and contractors
- compliance with legislation and regulation as a minimum and achieving best industry practice where possible
- assurance to external and internal stakeholders that our approach to managing building safety, including fire safety is fit for purpose.
- consistency and clarity in delivering property related services to an agreed standard.
- effective performance management arrangements to ensure that compliance with established standards - performance information against targets will be shared with customers
- increased awareness and ownership of safety responsibilities among our customers and colleagues
- clear accountability and ownership to ensure effective service delivery
- fit-for-purpose data, systems and processes that ensure workflow efficiency and compliance

In line with our purpose and vision of keeping our customers and colleagues safe and ensuring safe, high-quality and affordable homes, external environments and place.

Scope

This policy applies to all BFL properties where legal responsibility applies (existing and new homes). This policy applies to Bromford, Flagship, LiveWest and BFL employees, external contractors, and any agents providing defined compliance services on our behalf.

Roles/responsibilities

Compliance Safety Policy provides an appropriate framework that enables BFL to manage all aspects of compliance in line with legislative and regulatory requirements and sets out the defined roles and responsibilities.

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 Board is responsible for:

- 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.
- ensuring that appropriate governance arrangements are in place to keep internal stakeholders, and other interested third parties, informed of the regulatory landlord compliance position.
- ensuring the appointment of competent persons to provide professional advice on compliance safety matters and to support the effective discharge of legal responsibilities.

Customer Committee are responsible for:

- overseeing the effectiveness of the BFL's landlord's compliance safety controls with legislation and regulation on behalf of the Board
- reviewing of regular landlord compliance safety risk and performance reports
- reviewing performance and compliance failures, and ensuring that appropriate corrective and preventative remedial actions are taken so that a regulatory landlord compliant position is maintained
- providing critical friend support and advice

Audit and Risk Committee are responsible for:

- seeking assurance that the regulations are being adhered to, providing challenge on the adequacy of controls
- reviewing Internal Audit reports, and monitoring the delivery of actions arising, through to successful completion
- providing critical friend support and advice

Executive Board are responsible for:

- accountability to Board for compliance safety
- retaining the overall responsibility for the monitoring of the consistent implementation of this Policy
- if the regulatory standards are not maintained, to report any breach in standards to the Regulator of Social Housing
- ensuring that names statutory duty holders with appropriate skills and qualifications are in place where stated in legislation.
- providing appropriate support and resources to managers, ensuring that they have the capacity, knowledge, and formal arrangements to implement the Compliance Safety Policy

- managing some of its responsibilities through Disclosures Committee and Customer and Place Committee

Senior Leaders (with responsibility for Landlord's Compliance Safety) are responsible for:

- agreeing and setting budgets that are sufficient to meet the compliance safety requirements
- appointing /nominating sufficient resources to fulfil the requirements of this policy
- implementing the Compliance Safety Policy, within their area of responsibility, communicating, resolving issues on a day-to-day basis, or escalating them as appropriate
- embedding a positive compliance safety culture within their teams and promoting safe working practices
- ensuring policies, safety standards, 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 and support

Compliance Subject Matter Experts may be appointed for each aspect of compliance. They will be responsible for:

- drafting operational procedures and processes
- maintaining all accreditation, certification and registration
- delivering compliance to the agreed standard, programme and targets
- providing technical support and advice
- ensuring work undertaken meets the agreed standards
- undertaking Incident Reviews

Managing Agents will also comply with legislation as appropriate and provide evidence of certification in line with this policy.

Our Customers are responsible for:

Customers play a really important part in helping us to keep homes and communal areas safe for families, colleagues, visitors and neighbours.

We will ask our customers to:

- report any safety concerns they have to us
- keep their appointment or keep us informed if the appointments need to be rearranged
- allow us access when we make a reasonable request

- make sure an adult is present at the home to allow access and remain in the home if there are young people present
- keep communal areas free of obstructions at all times (including personal belongings)
- regularly check the detectors in their home
- read and follow the information and guidance we provide on customer safety. We will provide this guidance in an appropriate range of formats to meet individual customer needs

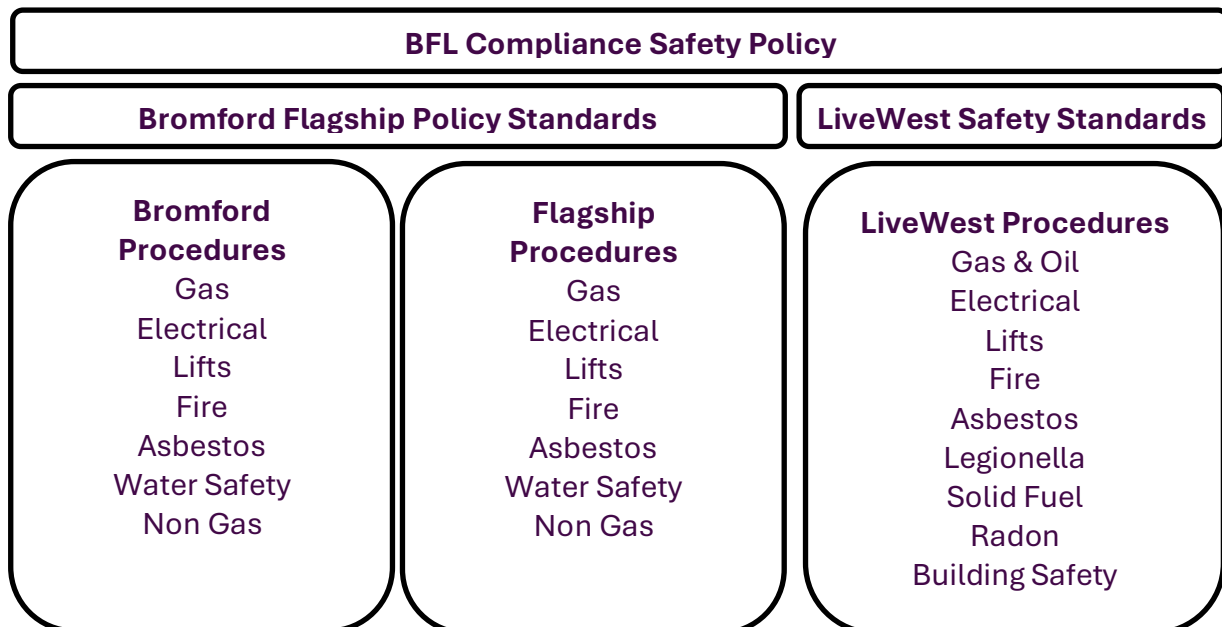
Policy content

About this policy

The safety of our customers, colleagues and contractors are at the heart of what we do at BFL. We are committed to ensuring that arrangements to deliver the full range of core Compliance Safety Services, including those required under the Building Safety Act, consistently meet legal and regulatory requirements and achieve our Regulator’s Consumer Standard, as an absolute minimum. Where appropriate, we will achieve what is considered to be industry and sector best practice.

To help us achieve this objective, we have developed a range of safety documents for Bromford, Flagship and LiveWest which sit below this overarching policy which define what we will do on each Property Compliance Service activity. The documents explain who is responsible for delivering the service and detail how frequently we expect to carry out specific activities in customers’ homes, external environments and places.

These safety documents that sit below this policy are supported by clear procedures and instructions to ensure that work streams are delivered consistently by our internal teams and by specialist contractors. Over the next 12 months it is our intention to work with customers to agree a single set of safety standards for BFL.



What the safety documents cover

Bromford Flagship have developed separate policies and LiveWest have developed Safety Standards around the property compliance activities that we consider to be the most significant, considering the level of risk involved and the scope or complexity of regulation and legislation associated with delivering the service. These are detailed below in priority order:

Building Safety Management includes:

- registering Higher Risk Buildings (HRBs) with the Building Safety Regulator
- maintaining the Golden Thread of building safety information
- preparing and maintaining Building Safety Cases and submitting Building Safety Case Reports
- coordinating fire safety and structural risk mitigation works
- implementing a Mandatory Occurrence Reporting procedure to manage and report safety incidents

Fire Safety Management includes:

- servicing, inspecting and maintaining fire protection and detection equipment
- undertaking fire risk assessments on communal areas and any blocks of flats with 2 or more dwellings (which have external entrances but do not have communal areas)
- managing the works arising from fire risk assessments
- providing advice and assurance to customers and teams around fire safety

Gas (and Oil) Management includes maintaining and regularly servicing gas and oil appliances and ensuring access against the prescribed timeframes.

Electrical Safety Management includes undertaking tests and inspections of communal areas and individual homes within prescribed timeframes, including ongoing maintenance and portable appliance testing.

Asbestos Management includes completing surveys and re-inspections on homes known to contain asbestos, arranging tests and removals, where appropriate and ensuring training and awareness of colleagues/contractors.

Legionella/Water Safety Management includes ensuring that our homes are safe through regular checks and flushing regimes and also undertaking checks on domestic properties on a risk-based approach.

Lift and Lifting Equipment Management includes servicing, inspecting and maintaining all kinds of lifts in communal areas and customer's individual homes.

Solid Fuel Management (LiveWest only) includes maintaining and regularly servicing solid fuel systems appliances and ensuring access against the prescribed timeframes.

Radon Management (LiveWest only) includes maintaining a radon testing programme, installation of radon remediation systems and ongoing servicing and inspection of all radon remediation systems.

Non Gas (Bromford and Flagship only) includes maintaining and regularly servicing non gas fuel system appliances and ensuring access against the prescribed timeframes.

The Standards and individual policies do address all the services where the risks are considered the highest, where regulation and legislation is most complex and where the most significant resources are deployed. All other compliance services are delivered in line with the principles enshrined in this policy. Additional Standards may from time to time be added to the framework described above.

The core principles

There are a number of core principles, enshrined in this policy, that are common to all, which are:

- responsibility for delivering each specific compliance safety service is clearly defined, ensuring accountability at all levels
- maintaining a cautious, averse approach to risk in all compliance safety matters
- all in-house teams and contractors involved in compliance work possessing the appropriate skills, knowledge, experience, and accreditation, with competence subject to ongoing review and documented in our processes and procedures
- having robust processes for engagement and enforcement to guarantee access to properties for compliance safety services, inspections, and repairs
- providing Safety Standards and Policies in an accessible format for a wide audience, published on our websites for transparency
- each Safety Standard and Policy including measurable service delivery targets, monitored monthly and reported to customers annually.
- Involving customers, wherever possible, in the design, review, and improvement of safety documents.
- ensuring access to homes is essential for full compliance; we have clear and firm arrangements in place to secure this access.
- holding the safety and wellbeing of our customers as our highest priority; we regularly survey customers about how safe they feel in their homes and take action based on their feedback

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. Our training, experience and qualifications will meet legal minimum requirements. 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.

Measuring effectiveness

We are fully committed to ensuring that the BFL Compliance Safety Policy and other Safety Standards and Policies are fit for purpose, reviewed periodically, and challenged against the latest changes to regulation and best practice.

Performance against delivery of these standards will be reported to the Board in line with the assurance framework. Performance against key standards will be reported to our customers through the annual report and available on our websites.

The compliance safety policies and standards will be made widely available to customers and stakeholders via an appropriate range of online and printed communication platforms (if requested).

We will review customer feedback and identify areas for service improvement on a continuous basis in order to improve performance and to prioritise our work.

Review period

The policy will be reviewed every two years through our Customer Committee and more frequently if there are major changes to either regulation or legislation.

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 (BFL) should be interpreted as equally applicable to all the above.

Legal Responsibilities

This policy has been written with regards to all relevant legislation and regulatory requirements including but not limited to:

- The Regulator of Social Housings Consumer Standards
- Building Safety Act and associated secondary legislation
- The Housing Act
- The Health and Safety at Work Act
- The Management of Health and Safety at Work Regulations
- The Construction Design and Management Regulations
- Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR)
- Disability Discriminations Act
- The Equality Act
- Gas Safety (Installation and Use) Regulations (GSIUR) as amended
- The Regulatory Reform (Fire Safety) Order
- Electrical Safety Standards in the Private and Social Rented Sector (England) Regulations
- The Control of Asbestos Regulations
- The Control of Substances Hazardous to Health Regulations
- The Control of Legionella Bacteria in Water Systems (ACOP L8)
- The Provision and Use of Work Equipment Regulations (PUWER 98)
- The Lifting Operations & Lifting Equipment Regulations (LOLER) - L113 (Second edition)
- The Housing Health and Safety Rating System. (HHSRS)
- The Fire Safety Act