

1 Policy Statement & Purpose

1.1 Bromford Housing Group are fully committed to meeting all relevant statutory & regulatory requirements, including best practice standards, when investing in existing homes, delivering continual improvement in performance and adopting a zero-tolerance approach to any deviation from this Policy.

1.2 The purpose of this policy is to demonstrate Bromford's commitment to ensuring that the risk to people, buildings and the wider business are reduced as far as reasonably practicable, whilst ensuring that all legislative requirements are met. This Policy will be supported by a detailed suite of operating procedures to ensure the Policy is fully embedded into working practice. The suite of operating procedures is documented in section 3.

2 Scope

2.1 Our Strategy 2023-2027: We have eight objectives of strategic focus. We have measurable targets for each, so customers and wider stakeholders can hold us to account over the life of the strategy:

- Place-based working
- Relationships that support customer aspiration
- Our move to scale
- Home Standard – closing the gap
- Proactive maintenance and compliance
- Agile working to solve problems
- Place-based pipeline of talent
- Known as a leader and influencer

2.2 Our strategy establishes our goals and explains how we will achieve them. It also states the targets we have set that will help us to monitor our progress.

2.3 This policy is designed to support the delivery of 'Place-based working' and 'Proactive maintenance and compliance' objectives. Of course, activity in this area of the business also has links and dependencies with the other six areas of strategic focus.

2.4 In line with legal and regulatory requirements Bromford have a duty to ensure we provide homes that provides customers with quality accommodation and a cost-effective repairs and maintenance service. This Policy covers quality of accommodation only. Repairs and maintenance and compliance, including gas, water, electrical and fire safety is covered by separate policies and procedures.

2.5 The policy is relevant to all Bromford employees, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon Bromford, to ensure customers live in quality accommodation and to maintain a safe working and living environment for customers and employees pre, during and post work cycles.

2.6 Our policy and processes ensure that our contractors and our own qualified engineers and surveyors provide a high-quality service in terms of competence, customer advocacy and maximisation of the life of our assets and their components. The policy provides assurance that measures are in place to ensure compliance with the regulations and to identify, manage and/or mitigate risks associated with investing in existing homes.

2.7 This policy is cognisant of current programmes of work, notably the Home standard, the Empty home standard and work emanating from the Sustainability group. It will be updated to ensure alignment periodically, or earlier if material to the effective delivery of the business strategy.

2.8 Additionally, this policy is cognisant of our EAM, drop 3 Transformation project. It is acknowledged that the Policy will need to be reviewed as part of adoption of the new processes, systems and ways of working. At its core EAM, drop 3, will deliver simplification (making it as easy as possible for colleagues to deliver services and for customers to access them), connected ways of working (linking data, processes and people) and consistent experiences for colleagues, customers and partners.

3 Reference Documents

3.1 Strategic Property Plan

3.2 30 year Business Plan

3.3 Responsive Repairs Policy and associated procedures

3.4 Decarbonisation Plan

3.5 Home Standard

3.6 CDM 2015 and Contractor Appointment Procedure

3.7 Asset Management procedure suite:

- Contract management procedure
- Condensation, Damp and Mould Policy
- Disrepair Policy
- Adaptations Policy
- Customer Alterations Policy

3.8 Each policy will include a process map (where appropriate), performance reporting definition, reporting methodology and control framework, including 2nd and 3rd line assurance.

3.7 Health and Safety Policy

4 Policy Principles

4.1 We will ensure that we fulfil our duties and responsibilities as a landlord as specified in the RSH's Consumer regulations, specifically the Home Standard, and in law by:

4.2 Having a full understanding of each home and its suitability to meet Bromford's short, medium and long-term strategic objectives and residents' needs.

4.3 Ensuring asset data is captured, accurate and supports the production of investment plans, including the 30yr Business Plan. This includes ensuring assets (customer homes, communal areas and commercial assets) are in receipt of a stock condition survey every 5 years.

4.4 Investing in existing homes to ensure they meet the Decent Homes standard (and any updated version), the Home Standard (as its approved) and our commitment to bring all homes up to an SAP rating of C by the latest 2030. In doing we will ensure reporting accurately captures specific requirements, including all elements of the decent homes standard.

4.5 Provide homes that are: secure; free from hazards (including Housing Health and Safety Rating System (HHSRS) hazards); energy efficient, they help to alleviate the pressures of fuel poverty; is free from damp and mould and disrepair and can be adapted to accommodate residents' changing needs.

4.6 Offering customers an aids and adaptations and customer alterations service, which support customers to live independently in their home and to meet their aspirations. Additionally, the Customer alterations service ensures works are reviewed and signed off ensuring compliance with the tenancy agreement and health and safety requirements.

4.7 Ensuring customers are fully engaged in the design, planning and delivery of the strategy at both a group and local level. The Customer and Community Influence Network (CCIN) will track performance delivery and will feed customer views into discussions about our investment plans. Local performance will be tracked by our Locality Influence Network (LIN). Additionally, the CCIN importantly have regular engagements with the Board to support the sharing of observations and the co-design of plans.

4.8 Delivering a fantastic customer experience that we will measure through our customer feedback tool. Experience will be reportable at contract, geographic and by experience measures and will be included in Contract Management meetings.

4.9 Delivering investment programmes within financial control totals and according to the financial rules of the business.

4.10 Only employing competent contractors and engineers to complete works. They will operate in line with the businesses DNA and policies.

4.11 Undertaking quality inspections to ensure contracts and work is being completed in line with health and safety and other standards, including Construction, design and management requirements.

4.12 Operating an effective 3-line assurance model across the Investment programme, KPI and KRI reporting and control framework. This includes:

- External validation of stock condition data and its quality to inform business planning assumptions.
- External benchmarking of operating cost, including cost modelling and whole life cost assumptions.

5 Responsibilities

5.1 The Board is responsible for:

- Ensuring Bromford complies with legislation and regulation.
- Ensuring effective controls are in place to maintain compliance and effective management of existing homes.
- Reviewing performance and assurance reports and scrutinising areas of non-compliance.

5.2 The Audit and Risk Committee are responsible for:

- Reviewing assurance reports and control frameworks and make recommendations to Board.
- Providing assurance to Board on compliance with all law and regulation.

5.3 The Executive Team is responsible for:

- Ensuring the appropriate resources and performance management and control frameworks are in place to ensure compliance with applicable laws and regulations
- Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance.

5.4 Risk and Compliance forum (RCF) is responsible for:

- Approving this document and notifying Executive and Board of key changes to this document.
- Reviewing the adoption of the Policy and monitoring its delivery

5.5 The Chief Investment Officer is responsible for:

- Reviewing, endorsing and achieving the principles within this policy.
- Ensuring the Strategic Property Plan and 30 year Business Plan allows the delivery of our strategic property goals.
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- Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance

5.6 The Director of Asset Management and Building Safety is responsible for:

- Ensuring the appropriate resources, performance management and control frameworks are in place to ensure compliance with applicable laws and regulations

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- Ensuring investment programmes are delivered in line with the policy, its procedures, financial limits and statutory and legal requirements.
 - Submitting monthly Key Risk Indicator (KRI) report to Board, Executive and RCF, and updating risk assurance quarterly.
 - Making recommendations and reporting non-compliance with policy to Board, Executive and RCF.

5.6 The Head of Home Investment is responsible for:

- Ensuring investment activity is fully maintained and reconciled to ensure asset data is accurate and reliable.
- Making recommendations and reporting non-compliance with policy, ensuring actions arising are implemented as agreed.
- Ensuring contractors deliver investment workstreams in line with the policy, its procedures (including the contract management framework) and statutory and legal requirements.
- Ensuring Competent Persons are selected and instructed to complete investment programmes, inspection and management as appropriate.
- Ensuring that all documentation complies with Regulations and the documentation is maintained and stored appropriately.
- Submitting monthly Key Performance Indicator (KPI) and Performance Indicator (PI) reports to Board, Executive and Investment Forum.

5.7 The Head of Data and Systems is responsible for:

- To capture and provide asset data that supports the production of investment plans.
- Ensuring investment activity is fully maintained and reconciled to ensure asset data is accurate and reliable.
- Ensuring that all documentation complies with Regulations and the documentation is maintained and stored appropriately.
- Submitting monthly Key Performance Indicator (KPI) and Performance Indicator (PI) reports to Board, Executive and Investment Forum.

5.8 All colleagues are responsible for:

- Carrying out their work in line with this policy and associated procedures and processes.
- Applying Bromford's DNA in everything they do.
- Reporting non-compliance to line management as soon as possible.
- Considering asset compliance in all activities and notifying compliance leads of any activity which puts compliance at risk.

6 Legislative Requirements

6.1 Our policy is to comply with all applicable legislation and regulatory requirements, including the following:

6.2 Regulatory Standards: The application of this policy will ensure compliance with the Social Housing Regulation Act 2024 and the Safety and Quality Standard.

6.3 Specifically in terms of quality of accommodation, registered providers shall:

- ensure that tenants' homes meet the standard set out in section five of the Government's Decent Homes Guidance and continue to maintain their homes to at least this standard
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- have an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenants. take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas.
- provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which they are responsible.
- assist tenants seeking housing adaptations to access appropriate services.

6.3 Legislation: The policy also operates in the context of the following:

- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- The Housing Act 2004, which introduced the housing health and safety rating system (HHSRS)
- Regulatory Reform (Fire Safety) Order 2006
- The Climate Change Act 2008, including its target of net zero carbon by 2050
- The Construction (Design and Management) Regulations 2015
- Fire Safety Act 2021
- Building Safety Act 2022
- Building (Higher-Risk Buildings Procedures) (England) Regulations 2023
- Fire Safety Regulations 2022
- Social Housing Regulation Act 2024

7 Assurance Framework

7.1 Our risk appetite for Home Investment is **open**; this recognises we have ambitious plans and have multiple channels for delivery, but we will not compromise on the provision of warm, safe and secure homes.

7.2 As such we always do everything reasonably practicable to ensure the risk appetite informs our decision making. We will operate robust processes and internal controls to mitigate against risk.

7.3 We will maintain a dynamic risk register of both strategic and operational risks and embed them in our management processes and culture. We will monitor risks using key Risk Indicators which will act as early warnings if risk levels increase.

7.4 This policy assists with mitigating the risk identified in our risk register, namely 'We fail to maintain the standards set by Bromford and the Decent Homes Standards resulting in customers being unable to thrive'.

7.5 A system of audits in line with our three lines of assurance will ensure that all aspects of this policy, associated procedures and any controls implemented, will be monitored to ensure its effectiveness.

7.6 Our Investment Forum provides oversight of delivery of the New and existing homes plans and scrutinises performance reports. We operate within an agreed scheme of delegation for reviewing and approving investment through our Investment Forum, providing assurance to the Board.

8 Performance Monitoring

8.1 The following KPI's, PI's and KRI's are reported regularly to Executive and Board

- % of home achieving decent homes standard
- % of homes with a stock condition survey completed in the last 5 years
- % of homes SAP banding C and above
- Investment delivery progress Vs budget
- Total capital investment
- Total revenue investment
- Total investment (capital and revenue combined)

Additional operational PIs are monitored by the Customer Experience MBR and the Asset Management and Building Safety/Strategic Property Planning MBR.

9 Value for money

9.1 Linking to the RSH's Value for money standard, we will optimise VfM in several ways:

9.2 Establishing the highest standard of data quality for all homes to aid accurate and robust planning.

9.3 Measuring Net Present Value and the Return on Investment in every home. This activity will be led by our Strategic Property Planning team. The team will lead the medium to long term planning of investment works ensuring our homes meet the needs of our current, future and aspiring customers so that we can achieve our purpose and deliver our strategy.

9.4 We will benchmark our costs with comparable peers, aiming to be in the top quartile. Where improvement is required, we will take a holistic review of the approach and activities needed to respond.

9.5 Delivering value through effective procurement and contract management. We will maintain a register of contracts, which helps us to prioritise and resource procurement activity. We will develop procurement contracting programmes with key stakeholders and will agree the approach to each procurement with them. The Procurement Team will support the business with delivering VfM through its contracting arrangements.

9.6 Regular review of the 30-year Business Plan.

10 Training

10.1 Training will be provided to Bromford colleagues as follows:

- Training will be bespoke to the individuals responsible for managing and delivering the service and refresher training will be provided as appropriate.
- Engineers will be trained and certified to the appropriate industry standards, to support delivery of investment workstreams.

10.2 Training records will be maintained and used to evidence compliance.

10.3 The same standards apply to external contractors employed to deliver work. We will monitor their training and certification at least annually, to ensure requirements with industry standards are met.

11 Communication and Review

11.1 This policy will be published on the Hub intranet site.

11.2 This policy will be reviewed every 2 years and in line with changes to government guidelines. It will be updated more frequently where there are material changes in the operating environment.

Document Details

Owner: Emma Burton Director of Asset Management and Building Safety

Approved By: Investment Forum

Date of Approval: September 2024

Next Review Due: September 2025
