

Bromford.

Lifting Equipment Safety Policy

December 2024

Policy Statement & Purpose

Bromford are fully committed to meeting all relevant statutory & regulatory requirements, including best practice standards, in the efficient inspection, maintenance and management of lifting equipment under its responsibility. This commitment will ensure that all its lifting equipment is maintained to a safe standard for use by its residents, colleagues, employees of other organisations, the general public and lift maintenance personnel. It will also ensure continual improvement in compliance performance associated with lifting equipment safety, adopting a zero-tolerance approach to any deviation from this Policy.

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

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1.0 Scope

1.1 Bromford will comply with all legislation, best practice and health and safety guidance in relation to the inspection, maintenance and management of all lifting equipment under its control and responsibility. This policy is applicable to all lifting equipment in properties Bromford owns and controls and includes communal passenger lifts, platform lifts, through floor lifts and medical lifting equipment owned and controlled by Bromford to which the Lifting Operations and Lifting Equipment Regulations (LOLER) applies. Although LOLER does not apply to domestic stairlifts Bromford will include domestic stairlifts within the scope of the policy.

1.2 Our policy and processes ensure that our contractors and our own qualified operatives provide a high-quality service in terms of value for money, competence, customer advocacy and maximisation of the life of our assets and their components. The policy provides assurance to Bromford that measures are in place to ensure compliance with both regulations and guidance and to identify, manage and/or mitigate risks associated with the management of its lifting equipment.

1.3 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 maintain a safe environment for customers and employees within the home of each customer and within and around all communal areas of buildings.

1.4 Bromford will follow a systematic approach to the management of lifting equipment to ensure, in particular, it meets the requirements set out in the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 and where applicable the Provision and Use of Work Equipment Regulations (PUWER) 1998. Adherence with these regulations will ensure the safety of customers, leaseholders, employees, and members of the public.

2.0 Reference Materials

List of Referenced Documents
<u>Lifting Equipment Safety Procedure</u>
<u>Lifting Operations and Lifting Equipment Regulations (LOLER) 1998</u>
<u>Provision and Use of Work Equipment Regulations (PUWER) 1998</u>

3.0 Responsibilities

3.1 The Board is responsible for:

- They are the responsible legal entity and must oversee the discharge of the required standards.
- They act as Duty Holders and are accountable for ensuring the implementation of this Policy and the associated Management Plans.
- They will receive assurance through regular performance reports that the Policy and Management Plan are being implemented and that the regulations are being fully complied with.
- In doing so they will ensure the safety of colleagues, customers, contractors, and the wider public has not been compromised.
- They will also ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested third parties, informed of the regulatory landlord compliance position.
- The Board will be responsible for ensuring that any necessary remedial action, arising from performance reports, are undertaken to comply with the Policy and ensure that a regulatory landlord compliant position is maintained.
- Will receive reports and commentary on lift safety compliance performance at each meeting.

3.2 The Audit and Risk Committee are responsible for:

- Seek assurance that the regulations are being adhered to providing challenge on the adequacy of controls.
- They will receive Internal Audit reports, and monitor the delivery of actions arising, through to successful completion.
- They will draw any concerns they may have arising from such reports to the attention of the Board.
- Provide critical friend support and advice.

3.3 Chief Executive Officer is responsible for:

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- Retains the overall responsibility for the monitoring of the consistent implementation of this Policy and associated Management Plans to effectively comply with the regulatory standards.
 - If the regulatory standards are not maintained, to report any breach in standards to the Board and Regulator of Social Housing.

3.4 The Chief Officers / Executive Team are responsible for:

- Appoint/nominate sufficient resources to fulfil the Responsible Person roles for all lift safety requirements and use this Policy to define their duties.
- Delegate appropriate authority for in-house delivery or procurement to meet the requirements.
- Ensure that the conditions of all contracts are being fulfilled either by Internal Service Provider/s or external Contractors.
- Will oversee the programme of Policy and Strategic Review.
- Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance.

3.5 Senior Leaders:

- Agree and set budgets that are sufficient to meet the compliance requirements.
- Will ensure the operational delivery of this Policy and Management Plans and compliance with the regulations.
- Will manage the strategic implementation of this Policy and ensure compliance with all Regulations.
- Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors (Internal and/or external) to address any delivery shortfalls.
- Monitor the quality and correct storage of all certification and documents required to demonstrate Landlord Compliance.
- Will provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance.
- Will implement Data Governance Protocols.
- Will receive audit feedback and act upon the findings.

3.6 Delivery Teams:

- Will formulate Programmes of Work consistent with the delivery of this Policy.
- Will instruct / liaise with internal operational managers and external Contractors in respect to the operational delivery of this Policy and Management Plan.
- Will liaise with Neighbourhood Management Team / Housing Team and customers to explain the importance of compliance and the need to achieve access to complete safety checks and works.
- Managing customer feedback (enquiries, complaints and compliments) handling and progress.
- Liaise with IT and ensure system(s) and interfaces operate effectively.
- Will manage the availability of accurate Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts.
- Will oversee the preparation of the KPI/MPI and OPI reporting suite.

3.7 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.

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- Reporting non-compliance to line management as soon as practically possible.
 - Considering asset compliance in all activities and notifying compliance leads of any activity which puts compliance at risk.

3.8 Customers:

- Agreeing to and keeping appointments to provide access.
- Liaising with Bromford colleagues in relation to any poor service, failure to attend / poor repair etc.
- Report any lift failure, faults or defects.
- Provide customer satisfaction information.

3.9 Contractors / Suppliers:

- Operational delivery of Lift Safety Inspections to Non-Domestic and Domestic Stock.
- Review property addresses and reconcile with databases to ensure the programme remains accurate.
- Liaise with customers in relation to arranging/keeping appointments.
- Liaise with the delivery teams in relation to access issues.
- Update system(s) with accurate data in line with Data Protocols.
- Provide appropriate, complete and correct certification for all lift Safety works.
- Provide Quality Assurance (QA) checks in accordance with the contract.

3.10 Independent External Auditor:

- Undertake External Validation of Lift Safety Inspections in line with the Management Plan.

3.11 Internal Audit and assurance:

- Conduct reviews according to audit and assurance plans as agreed with ARC.

4.0 Legislative Requirements

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

4.1 Regulatory Standards

The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was updated by the Homes & Communities Agency (HCA) in April 2015.

4.2 Legislation

Bromford acknowledges and accepts their responsibilities specifically under the Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 and where applicable the Provision and Use of Work Equipment Regulations (PUWER) 1998.

4.3 Additional Legislation and Guidance

The policy also operates in the context of the following additional legislation and guidance:

- Health and Safety at Work etc. Act 1974 and subsidiary regulations
- Management of Health and Safety at Work Regulations 1999

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- The Housing Act 2004
 - The Landlord and Tenant Act 1985 and 1987
 - The Housing Acts 1985 and 1988
 - Disability and Discrimination Act 2005
 - The Equality Act 2010
 - Safety Assessment Federation Guidelines (LG 1 -Issue 04- 01/06/2020)

All relevant British and European standards including BS EN 81-1:1998 (Electric Lifts), BS EN 81-2:1998 (Hydraulic Lifts) EN 81-20 and all applicable BS EN 81 Codes of Practice and Standards.

BS 7255 Code of Practice - Safe Working on Lifts and BS 9102 Code of Practice - Safe Working on Platform Lifts

BS EN 13015 Maintenance for lifts and escalators Rules for maintenance instructions

- Health & Safety Executive (HSE) Guidelines Note, PM 26 Safety at Lift Landing
 - Fire Safety (England) Regulations 2022
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5.0 Policy Principles

5.1 To ensure we provide a safe environment for customers, colleagues and third parties to live and/or work we will:

- Carry out all necessary servicing, safety checks and Thorough Examination (as defined under LOLER), to pre-defined frequencies, on lifting equipment in Bromford ownership and to other equipment governed by LOLER, or where required by best practice, that we have a responsibility to maintain.
- Act on any recommendations for remedial action that result from either the operation of the Thorough Examination or through routine maintenance within acceptable pre-defined timescales as specified by the inspecting engineer.
- Ensure adequate insurance is in place for all lifting equipment in Bromford ownership.
- Ensure every contractor or consultant employed by Bromford to carry out lifting equipment inspection and/or maintenance is competent and has the relevant licenses, registrations, accreditations and qualifications, as specified by the relevant regulations and Bromford procedures.
- Ensure every contractor or consultant employed by Bromford has suitable risk assessments and method statements in place to ensure safe working practices are always followed.
- Ensure all reasonable steps to gain access to properties are taken, including court injunctions where necessary, in accordance with Bromford's access procedures.
- Ensure asset data bases and customer records are maintained accurately and data reconciliation is undertaken frequently, as prescribed in the supporting Lift Safety procedures.
- Keep records of all servicing and access attempts in a central and accessible location and in accordance with all relevant regulations. All contractors are to receive full training on how to access such systems to ensure this data is fully up to date and accessible.
- Ensure emergency procedures are in place, including safe passenger release for persons trapped in lifts, which are reviewed regularly and are available to all colleagues and relevant third parties.
- Ensure relevant monitoring processes are in place and compliance with this Policy is reported on regularly.
- Report critical exceptions and deviation from this Policy to an Executive Director within agreed timescales.

6.0 Assurance Framework

6.1 The Legal and Regulatory risk appetite of Bromford's Board is generally minimal, and it is risk averse with respect to landlord asset compliance. As such we always do everything reasonably practicable to ensure Legal and Regulatory compliance. Our compliance management comprises high-level oversight and assurance at Board and Executive level, mid-level oversight at Senior Leadership level and detailed scrutiny at management level.

6.2 This policy assists with mitigating the risk identified in our risk register, namely 'We fail to ensure safety and asset compliance across our homes resulting in death or injury to customers, colleagues or a third party'.

6.3 A system of audits in line with our 3 lines of assurance will ensure that all aspects of this policy and any controls implemented, will be monitored to ensure its effectiveness.

7.0 Performance Monitoring

7.1 The following KPI's will be introduced to measure our performance on lifting equipment safety across all locations of the Group:

- Passenger Lifts: number of overdue LOLER Thorough Examinations, including the dates these became due.
- Through Floor Lifts: Number of overdue LOLER Thorough Examinations, including the dates these became due.
- Passenger Lift: LOLER Examinations due in 7, 30 and 60 days.
- Through Floor Lifts: LOLER Examinations due in 7, 30 and 60 days
- Through Floor Lifts: number in no access process

7.2 Contractor accreditations and operative qualifications will be monitored and updated during each contractor progress meeting to ensure accuracy and a validation audit will be undertaken in accordance with our 3 lines of assurance. An appointed auditor will inspect 10% of the annual Thorough Examinations monthly.

8.0 Training

8.1 Training will be provided to colleagues as follows:

All operators of Lifting equipment must have suitable knowledge or experience of using equipment, and where required be adequately trained in:

- the methods of use for the equipment
 - any risks arising from the equipment
 - appropriate controls and precautions to be observed while using the equipment
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9.0 Communication and Review

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

9.2 This policy will be reviewed annually and in line with changes to government guidelines.

Document Details

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Author: Head of Compliance
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