

HEALTH AND SAFETY POLICY

Health and Safety Policy

Responsible Officer	Group Director of Governance
This policy is applicable to	Karbon Group
Policy version	7
Date this version implemented	25 May 2026
Date of next review	May 2027

Policy Statement

The Group Health and Safety Policy sets out how the Karbon Homes Group (the Group) protects the health, safety and wellbeing of colleagues, customers, contractors and anyone affected by its activities. It outlines the Group's commitment to meeting all legal and regulatory health and safety requirements, and to going beyond minimum compliance by continually improving safety performance.

The Group's approach is based on clear roles, responsibilities and strong governance. The Group Board holds ultimate accountability for health and safety and ensures the right strategies, resources and monitoring arrangements are in place.

The policy is reviewed at least annually to reflect legislative, regulatory or organisational changes.

Overall, the policy reinforces that health and safety is a core part of how the Group operates, guiding decisions, shaping culture and ensuring safe environments for colleagues and customers.

Risk the policy is designed to control

1. Health and Safety: Risk of failure by the Group to take all reasonable health and safety measures leading to serious injury or loss of life.

Key performance measures

Key health and safety compliance measures are reported quarterly to Group Board:

- Workplace health and safety (RIDDORs, accidents and incidents, near misses, % mandatory training completion)
- Building and customer health and safety (fire safety, gas safety, electrical safety, asbestos management, lift safety, legionella, Awaab's Law metrics)
- Development health and safety (incidents and near misses)

Definitions

Health and Safety Lead:	Defined by the Social Housing (Regulation) Act 2023. The Health and Safety Lead is responsible for monitoring the Group's compliance with health and safety statutory requirements that relate to the safety of tenants; assessing risks of failure to comply with those requirements; notifying the Board of material failures to comply with requirements and advising the Board on assessing risks and failures to comply with requirements	Executive Director Customer Services
Competent Person:	Defined by the Management of Health and Safety at Work Regulations 1999. The Competent Person must have the skills, knowledge and experience to be able to recognise hazards and put sensible controls in place to protect workers and others from harm.	Group Health and Safety Manager
Duty Holder:	Individual or entity ultimately legally responsible for ensuring health and safety legal and regulatory requirements are met.	Karbon Homes Limited
Responsible Person:	Competent individual appointed to manage day-to-day risk control to ensure the safety and health of people in a workplace or other premises.	See Responsibilities section below
Responsible Person (RIDDOR 2013)	The employer.	Karbon Homes Limited
Responsible Person (Fire Safety Act 2021):	Defined by the Fire Safety Act 2021. The individual or organisation with control over a premises and legal obligation to ensure fire safety and compliance with fire safety legislation.	Karbon Homes Limited
Accountable Person and Principle Accountable Person (Building Safety Act 2022):	Defined by the Building Safety Act 2022. The owner of the building with responsibility for repair.	Karbon Homes Limited

Abbreviations

HSE:	Health and Safety Executive
RAMS:	Risk Assessment and Method Statement
The Group:	The Karbon Homes Group of Karbon Homes Limited and its subsidiaries
KHL:	Karbon Homes Limited

Policy Detail

1.0 Purpose of policy

- 1.1 This policy clearly sets out the health and safety roles and responsibilities within the Karbon Homes Group (the Group) and sets out the Group's overall health and safety approach, aims and commitment to protecting the health and safety of customers, colleagues and third parties.
- 1.2 The Karbon Homes Group (the Group) is formed of Karbon Homes Limited (KHL) and its subsidiaries. KHL and some of its subsidiaries are registered providers with the Regulator of Social Housing. KHL sets the Group's overall policies and strategies, monitors compliance with Group values, and oversees performance against agreed targets within a clear framework of delegation and control. Subsidiaries are responsible for delivering services and achieving their business plans within these parameters. Subsidiary boards are responsible for oversight of health and safety within their organisation, with ultimate responsibility for oversight resting with the Karbon Group Board.

2.0 Objectives

- 2.1 The objectives of this policy are to:
 - Publish our HSE Health and Safety Policy Statement
 - Set out our health and safety approach, aims and commitments
 - Clearly state our health and safety roles and responsibilities.

3.0 Policy detail

3.1 HSE Health and Safety Policy Statement

This Statement sets out the Group's approach to workplace health and safety, in line with the requirements of the Health and Safety at Work Act 1974.

The Group is committed, so far as is reasonably practicable and in accordance with the Health and Safety at Work etc. Act 1974 and associated legislation, to conducting its operations with proper regard for the health and safety of employees, customers, contractors and any others affected by its activities.

Management will pursue continuous improvement in health and safety performance, recognising legal compliance as the minimum acceptable standard. This includes staying informed of new and emerging legislation and ensuring all health and safety risks are assessed and effectively managed. The Group aims to minimise

workplace injuries and ill health, protect the environment and reduce avoidable losses and liabilities.

To achieve these commitments, the Group will ensure that:

- all necessary resources and supervision will be made available so that workplaces, work systems, plant and equipment, the handling, storage and transportation of articles and substances are carried out in a safe manner
- adequate communication, instruction, information, training, and supervision is available to enable the avoidance of hazards and to promote an environment of safe working
- a safe and healthy working environment is made available to all colleagues and persons affected by its operation.

A proactive approach to risk management, compliance with legal duties and the fostering of a strong safety culture across all operations underpin these aims.

All managers must review, understand and ensure implementation of this policy within their areas of accountability.

Every colleague is responsible for taking reasonable care of their own health and safety and that of others, and for co-operating with the Group to enable it to meet its statutory responsibilities.

The Group Health and Safety Manager reports to the Group Director of Governance, who has overall responsibility for the development and implementation of the policy.

Health and safety management is treated with equal importance as all other core business functions due to its contribution to performance and risk reduction.

Signed:

Russell Hall

Group Director of Governance

25 May 2026

3.2 **Building and Customer health and safety**

The Group's health and safety approach, aims and commitments for building and customer health and safety are as follows:

The Group's commitment to the safety of our customers in their homes is central to everything we do. We work within the legislative and regulatory context, including, but not limited to, the Regulator of Social Housing's Consumer Regulations, the Building Safety Act 2022 and the Decent Homes Standard. We seek to maintain standards of safety across our buildings, ensure a safety culture is embedded across our organisation, and engage and communicate with customers when it comes to the safety of them and their homes.

In line with the requirements of the Building Safety Act 2022 the Group works to ensure that its buildings are safe, functional and maintained to a high standard. A

robust safety management system of policies, procedures and safety plans is in place. The Group is committed to safeguarding the health, safety and wellbeing of everybody living in, working in or visiting our buildings.

Robust health and safety measures are in place to ensure compliance and reduce risk so far as is reasonably practicable across the 'big six' compliance areas: asbestos; fire safety; gas safety; electrical safety; lift safety; and legionella, as well as for damp and mould. Dedicated teams are in place to manage compliance, supported by a rigorous oversight and performance reporting structure, policies and procedures and accurate data.

Top-level commitment to health and safety, is led by the Group Board. Health and Safety, including employee, building and customer health and safety, is a principal risk reviewed at each Group Board meeting, with the Group Board, its committees, and subsidiary boards maintaining scrutiny of health and safety performance and leading the Group's health and safety culture.

3.3 Development health and safety

All development projects are planned with health and safety in mind from the outset, ensuring all health and safety duty holders are aware of their responsibilities in line with the Group's Construction (Design and Management) Policy. Contractors are required to have in place the correct accreditations, risks assessment and method statements (RAMS) and all relevant documents and certificates relating to work carried out. Site inspections are undertaken and development health and safety performance is scrutinised by the Group Development Committee.

3.4 Roles and responsibilities

3.4.1 Responsible Persons table:

Responsibility	Responsible Person
Building Safety	Group Assistant Director Building and Customer Safety
Gas Safety (exc. 54N)	Heating Compliance Manager
Electrical Safety (exc. 54N)	Electrical Compliance Manager
Gas Safety and Electrical Safety 54N	Group Head of Asset Management
Lift, Asbestos and Water Hygiene Landlord Compliance	Group Head of Asset Management
Competent Person under Management of H&S at Work Regulations 1999	Group Health and Safety Manager
Provision and Use of Work Equipment Regulations 1998	The relevant local manager/s overseeing the work

3.4.2 The responsibilities of boards and board committees are as follows:

- **Group Board:** The Group Board has overall responsibility for the conduct of business and delegates operational management to the Group Chief Executive and Executive Team. The Board is accountable for health and safety. It ensures

that a clear strategy, supported by suitable policies and procedures, is in place; monitors performance through annual reports, quarterly indicators and committee scrutiny; features health and safety as a standing agenda item; and ensures sufficient resources to meet legal duties.

- **Subsidiary Boards:** Subsidiary boards are responsible for oversight of health and safety within their organisation, with ultimate responsibility for oversight resting with the Karbon Group Board.
- **Group Committees:** Group Committees support the Boards by scrutinising particular areas of health and safety risk and performance and highlighting any concerns to the relevant Board/s:
 - **Group People Committee** scrutinises colleague health and safety
 - **Group Customer Committee** scrutinises building and customer health and safety
 - **Group Development Committee** scrutinises development health and safety
 - **Group Audit and Risk Committee** ensures that appropriate focus is given to the management and assurance of all principal risks, including health and safety risks.

3.4.3 The responsibilities of management committees are as follows:

- **Group Executive Team:** The Executive Team collectively supports the Chief Executive. Individually, each Executive Director is responsible for colleague health, safety and wellbeing within their service area. They must implement Group policies, ensure adequate resources, require effective training arrangements and promote a positive safety culture.
- **Karbon Leadership Team:** Group Directors and Group Assistant Directors support Executive Directors and each hold responsibility for the health, safety and welfare of colleagues and customers within their services. As the Karbon Leadership Team (KLT), they approve health, safety and wellbeing policies and procedures. They must ensure effective health and safety management through appraisal processes and promote strong safety leadership.
- **Corporate Health and Safety Group:** The Corporate Health and Safety Group includes the Group Director of Governance and other Senior Leadership Team members, an Asset Management representative and a People and OD representative. The Group's focus is on the co-ordination, delivery and assurance of health and safety across the Group.
- **Building and Customer Safety Working Group:** The Building and Customer Safety Working Group is accountable to the Corporate Health and Safety Group and has oversight of the delivery of all building safety-related work across the Group, with representation from teams across the organisations. It tracks progress of the delivery of relevant actions and monitors outstanding and overdue fire risk assessment actions. It has a remit to make recommendations to the Corporate Health and Safety Group, Group Executive, Group Customer Committee or Group Board on building safety issues.
- **Karbon Property Services Health, Safety and Wellbeing Forum:** This forum includes managers, colleagues, trade representatives and Health and Safety colleagues from Property Services. It meets regularly to discuss health and safety issues raised by colleagues and to support improvements. Issues may be escalated to the Trade Union Joint Consultative Committee.

- **Karbon Colleague Forum:** The Colleague Forum comprises representatives from all directorates and is attended by senior leadership. It provides a formal mechanism for raising health and safety concerns as part of broader organisational consultation duties.

3.4.4 The responsibilities of individuals are as follows:

- **Group Chief Executive:** The Chief Executive holds overall responsibility for ensuring effective arrangements and resources are in place to deliver this policy
- **Group Director of Customer Service:** The Group Director of Customer Service is the Group's Health and Safety Lead as defined by the Social Housing (Regulation) Act 2023. They are responsible for monitoring the Group's compliance with health and safety statutory requirements that relate to the safety of tenants; assessing risks of failure to comply with those requirements; notifying the Board of material failures to comply with requirements and advising the Board on assessing risks and failures to comply with requirements.
- **Group Director of Governance:** The Group Director of Governance chairs the Corporate Health and Safety Group, manages the Group Health and Safety Manager and submits regular corporate health and safety reporting and the annual Health and Safety performance report to the Board.
- **Group Assistant Director of Building and Customer Safety & Group Director of Assets and Regeneration:** These roles lead the delivery of property-related compliance programmes, ensuring that high-quality and effective processes are in place to meet regulatory obligations and protect tenants and properties. Responsibilities include operational delivery of statutory compliance functions, leading the compliance team and ensuring accurate data and adherence to data protocols.
- **Building Safety Manager:** The Building Safety Manager leads delivery of statutory responsibilities for our occupied higher risk buildings under the Building Safety Act 2022 including all applicable secondary legislation and the Fire Safety (England) Regulations 2022. They will be responsible for the design and operation of the safety management system for building safety within our higher-risk buildings. They will also be responsible for leading communication with the Building Safety Regulator.
- **Fire Safety and Compliance Manager:** The Fire Safety and Compliance Manager is responsible for managing the delivery of fire risk assessment remedial programmes, programmes of periodic fire door inspections and fire safety related maintenance compliance programmes to ensure statutory, regulatory and key performance indicators are met.
- **Head of Asset Management:** The Head of Asset Management oversees strategic asset management, investment planning, data governance and delivery of specific compliance areas. They must ensure full compliance with regulatory requirements, maintain accurate data and lead on compliance scheduling, budgeting and surveying. They are the nominated Responsible Person under the Control of Asbestos Regulations 2012 and Water Hygiene (Legionella) Regulations
- **Group Health and Safety Manager:** The Group Health and Safety Manager is the appointed "Competent Person" under the Management of Health and Safety at Work Regulations 1999. They design and oversee the Group's health and safety strategy, develop supporting policies together with the relevant policy owners, monitor implementation, provide advice and leadership to managers

and safety colleagues, collaborate with People and OD colleagues on wellbeing initiatives, support line managers on operational matters and maintain communication with the Group Director of Governance to support reporting requirements. The Group Health and Safety Manager will be responsible for approving a matrix of training and development requirements for colleagues.

- **Health and Safety Officers:** Health and Safety Officers support the delivery of high standards of health and safety across the Group. They assist with planning safe working practices, risk assessment review, occupational health risk and surveillance activities, inspection administration and accident investigation. They provide guidance, training and feedback and maintain communication with the Group Health and Safety Manager.
- **Line Managers:** Line Managers are responsible for the workplaces and colleagues they supervise. They must ensure safe systems of work supported by suitable and sufficient risk assessments, monitor compliance through personal development processes, promote safety awareness, report and investigate incidents, take reasonable care of health and safety and provide wellbeing support.
- **People and Organisational Development:** This team leads the People Strategic Plan, including wellbeing, bullying and harassment, sexual harassment and absence management. Their responsibilities include embedding health, safety and wellbeing (including mental health) within organisational wellbeing pillars, meeting the minimum requirements of the Workers Protection Act 2023, improving wellbeing processes and supporting safe return to work arrangements in collaboration with managers and the Health and Safety team.
- **All colleagues:** The conduct, actions and decision making of all colleagues must promote the health, safety, security and wellbeing of themselves and others. Colleagues should not knowingly put their own or others' health, safety, security or wellbeing unnecessarily at risk. If colleagues have any concerns about the health, safety, security or wellbeing of themselves or others they must report this immediately. Colleagues must also report when 'something isn't right' in customers' homes.
- **Customers:** The Karbon Homes Strategic and Resident Building Safety Group, alongside the Karbon Residents' Committee and the 54 North Homes Customer Experience Committee, provide independent customer feedback and review service performance. They help ensure that customer experience and building safety considerations are integrated into the Group's services.

3.4.5 Other management committees may be established as required. In the case of any global or local pandemic, the Group will assign relevant members to carry out regular meetings chaired by a Senior Leadership Team member to discuss and agree any changes in working arrangements and ongoing provision of operational services, such as emergency and urgent repairs, extra care and supported housing.

4.0 Monitoring and Review

4.1 This policy will be reviewed annually, or more frequently as necessary in the light of any legislative, regulatory or organisational change.

5.0 Equality and Diversity

- 5.1 This policy is applied in line with our Inclusion and Belonging Policy. This includes the legal requirements of the Equality Act 2010, Workers Protection Act 2023 and the Public Sector Equality Duty.
- 5.2 At the Karbon Group we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 5.3 If you would like this or any other policies in a different language or format please contact inclusion@karbonhomes.co.uk.

6.0 Data Protection and Privacy

- 6.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Group which, along with its associated procedures, must be followed throughout the operation of this policy.