



HONEYCOMB
GROUP

Lift Safety Policy



Lift Safety Policy

Who's this for?	The Honeycomb Group – Staffs Housing; Concrete; Glow
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Owner (Executive Lead)	Executive Director of Operations
Approved by Executive Team	13 July 26
Approved by Board	N/a

Document Revision History

Version	Date	Description of Change	Author
2.0	June 26	Full review from the BDO audit	Sharon Parkes Health and Safety Manager

1. Introduction and policy objectives

- 1.1 As a landlord, Honeycomb Group (Honeycomb) is responsible for maintenance and repairs to our homes, communal blocks and other properties we own and manage, some of which will contain domestic lifts, passenger lifts and other lifting equipment. We are responsible for maintaining these lifts and carrying out periodic thorough examinations to ensure they continue to operate safely.
- 1.2 The key objective of this policy is to ensure our Board, Executive Team, employees, partners and customers are clear on our legal and regulatory lift safety obligations. This policy provides the framework our staff and partners will operate within in order to meet these obligations.
- 1.3 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy). It will be saved on our shared drive and distributed to all relevant members of staff and contractors.

2 Scope

- 2.1 This policy is relevant to all our employees, customers, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.
- 2.2 The policy should be used by all to ensure they understand the obligations placed upon Honeycomb to maintain a safe environment for customers and employees within the home of each customer, and within all communal areas of buildings and other properties we own and/or manage. Adherence to this policy is mandatory.
- 2.3 This policy is specifically for use and implementation by the Property Team.
- 2.4 We own and manage domestic properties which have been adapted with living aids such as stair lifts, through floor lifts and hoists to enable customers to continue to live independently. We take responsibility for the lifts which have been installed within our domestic properties which we have been made aware of.

3 Regulatory standards, legislation and codes of practice

- 3.1 **Regulatory Standards** – We must ensure we comply with the Regulator of Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.
- 3.2 **Legislation** - The principal legislation applicable to this policy is as follows:
 - The Health and Safety at Work Act 1974
 - The Lifting Operation and Lifting Equipment Regulations 1998 (**LOLER**)

- The Provision and Use of Work Equipment Regulations 1998 (**PUWER**)
- 3.3 Approved Code of Practice (ACoP)**–The principal ACoP applicable to this policy is:
 - ACoP L113 - Safe use of lifting equipment: Lifting Operations and Lifting Equipment Regulations 1998 (2nd edition 2014)
- 3.4 Guidance** – The principal guidance applicable to this policy is as follows:
 - INDG422 - Thorough examination of lifting equipment: A simple guide for employers (2008)
 - INDG339 - Thorough examination and testing of lifts: Simple guidance for lift owners (2008)
- 3.5 Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; prosecution under LOLER or PUWER; and via a regulatory notice from the Regulator of Social Housing.

4 Additional legislation

- 4.1** This policy also operates within the context of the following legislation:
 - The Management of Health and Safety at Work Regulations 1999
 - The Workplace (Health Safety and Welfare) Regulations 1992
 - The Building Regulations 2004
 - Construction (Design and Management) Regulations 2015
 - Equality Act 2010
 - Housing Act 2004
 - Control of Asbestos Regulations (CAR) 2012
 - Landlord and Customer Act 1985
 - Homes (Fitness for Human Habitation) Act 2018
 - UK GDPR and Data Protection Act 2018
 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

5 Obligations

LOLER

- 5.1** Passenger lifts in workplaces (for example, offices and communal blocks), which are used by people during their course of work, fall within the scope of LOLER. It requires landlords to maintain lifts and ensure that they have thorough examinations:
 - Before use for the first time;
 - After substantial and significant changes have been made;

- At least every six months if the lift is used at any time to carry people or every 12 months if the lift is only carrying loads (or in accordance with an examination scheme); and
- Following exceptional circumstances such as damage to, or failure of, the lift, long periods out of use, or a major change in operating conditions which is likely to affect the integrity of the equipment.
- Thorough examination reports must be kept for at least two years.

PUWER

5.2 PUWER applies to all work equipment, including lifting equipment.

Health and Safety at Work Act 1974

5.3 Section 3 of the Health and Safety at Work Act makes employers, such as landlords, responsible for the health and safety of employees and people using or visiting their premises, so far as reasonably practicable (including customers).

5.4 For tenanted properties with stair and through floor lifts, duties may be adequately discharged by adopting the same provisions as applies to all other lifting equipment covered by LOLER (carrying out regular maintenance and a six-monthly thorough examination).

Insurance

5.5 Insurers may impose demands for similarly stringent levels of risk management to cover public liability.

6 Key Roles and Responsibilities

6.1 The Board has overall governance responsibility for ensuring this policy is fully implemented in order to ensure full compliance with legislation and regulatory standards. As such, the Board will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).

6.2 For assurance that this policy is operating effectively in practice, the Board will receive regular updates on its implementation, lift safety performance and non-compliance.

6.3 The Executive Team will receive monthly performance reports in respect of lift safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.

6.4 The Executive Director of Operations has strategic responsibility for the management of lift safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.

6.5 The Head of Property, with support from the Assets and Contract Manager, has operational responsibility for the management of lift safety and will be responsible for overseeing the delivery of these programmes.

7 Statement of intent

- 7.1** We acknowledge and accept our responsibilities under the legislation outlined in Section 5.
- 7.2** We will adopt the same principles for the management of lifts within domestic properties as for passenger lifts and any other lifts provided as work equipment. We will therefore carry out a programme of periodic servicing and maintenance and thorough examinations to lifts within domestic properties, where these have been installed by us, or where our customer has installed one and has made us aware of it.
- 7.3** We will ensure all lifting equipment is subject to a thorough examination before being commissioned into use for the first time.
- 7.4** All lifting equipment will be subject to a periodic thorough examination and routine servicing and maintenance.
- 7.5** All lifts that we install in properties we own or manage will be fully accessible for disabled users, as per the requirements of the Equality Act 2010, and to the specifications outlined in Part M of the Building Regulations 2004.
- 7.6** We will endeavor to ensure that all lifting equipment will be in full working order at all times. Where we become aware of a breakdown it will be assessed within 24 hours, and necessary action will be determined to restore the equipment.
- 7.7** We will operate robust processes to deal with entrapment situations. In the event of any persons becoming trapped in a lift we are responsible for we will ensure our lift contractor attends within two hours.
- 7.8** We will operate a robust process to manage and rectify immediately dangerous situations identified during a lift safety check or any other maintenance work.
- 7.9** All passenger lifts will have an intercom that dials directly to a dedicated call centre. Call handlers will contact emergency services if there is an urgent concern for a person's welfare.
- 7.10** Where a void property has a stairlift or other lift fitted, we will remove it unless the incoming customer has a particular agreed need, confirmed by an Occupational Therapist (OT) which will be met by the existing lift, if not the lift will be removed. Where the lift is being left in situ, it will have a service visit to ensure it is safe and working correctly at the point the new tenancy commences. The new customer will be shown how to operate the lift safely and sign to confirm they have received this instruction.
- 7.11** We will operate a robust process to gain access to properties to undertake thorough examinations, lift safety/servicing visits and follow-on works. Where customer vulnerability issues are known or identified we will ensure we safeguard the wellbeing of the customer.
- 7.12** We will operate effective contract management arrangements with the contractors responsible for delivering the service, including; ensuring contracts are in place, conducting client-led performance meetings, and

ensuring that contractors' employee and public liability insurances are up to date on an annual basis.

- 7.13** We will establish and maintain a risk assessment for lift safety management and operations, setting out our key lift safety risks and appropriate mitigations.
- 7.14** To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM), a Construction Phase Plan will be in place for all repairs work to void and tenanted properties (at the start of the contract and reviewed annually thereafter), component replacement works and refurbishment projects. This plan will detail what is required to reinstate lifts affected by the works, to ensure they are safe to use and continue to comply with relevant legislation.
- 7.15** We will ensure there is a robust process in place to investigate and manage all RIDDOR notifications made to the HSE in relation to lift safety and will take action to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.

8 Inspection Programmes

- 8.1** All lifting equipment, including stair and through-floor lifts, will be subject to a thorough examination:
- Before being commissioned into use for the first time
 - Every six months the lift is being used to carry people
 - Every 12 months if the lift only carries loads
 - In accordance with an examination scheme (as prepared by a competent person) where there is one in place, or
 - In accordance with our insurer's specification (which is six monthly).
- 8.2** All lifting equipment will be subject to monthly routine servicing and maintenance in line with manufacturers' recommendations and/or any examination scheme.
- 8.3** All lifting equipment which is being retained within a void property will be subject to servicing and maintenance when the property is re-let to ensure it is safe for the next customer (7.10).

9 Follow-up Work

- 9.1** We will ensure there is a robust process in place for the management of any follow-up works required following the completion of a thorough examination or servicing and maintenance inspection (where the work cannot be completed at the time of the examination or servicing/inspection).
- 9.2** We will endeavor to complete follow-on works within the following timescales:
- Emergency – within 24 hours
 - Urgent – within three calendar days
 - Routine – within ten calendar days.

10 Data and record keeping

- 10.1** We will maintain an asset register of all properties we own or manage, on our housing management system with component/attribute data against each property, setting out which properties have lifts that require a thorough examination. We will also set out which properties have lifts that require ongoing servicing and maintenance. This register will also hold data against each property asset of the type, age and condition of lifting equipment in place.
- 10.2** We will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from lift safety programmes and the programme remains up to date.
- 10.3** Where we install any stairlifts or other lifts to domestic properties or give approval for or become aware of any installation of such lifts, we will add these to the thorough examination and servicing programmes.
- 10.4** We will hold records of the following against all properties on each programme:
- Thorough examination dates and reports;
 - Servicing and maintenance dates and reports;
 - Any examination schemes in place;
 - Evidence of completed remedial works; and
 - Entrapment incidents.
- 10.5** All programme data as outlined above will be stored electronically on our management system.
- 10.6** We will keep all records for at least five years and have robust processes and controls in place to maintain appropriate levels of security for all lift safety related data and records.

11 Customer involvement and engagement

- 11.1** We consider good communication essential in the effective delivery of lift safety programmes, therefore, in accordance with our Customer Voice approach we will continue to develop our customer engagement strategy and communication programme. This will support customers in their understanding of lift safety.
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- 11.3** This will assist us in maximising access to carry out periodic servicing and thorough examinations, encourage customers to report any lift safety concerns, and help us to engage with vulnerable and hard to reach customers.

- 11.4** We will share information clearly and transparently and will ensure that information is available to customers via regular publications and information on our website.

12 Competent persons

- 12.1** The operational lead will hold an appropriate qualification, such as the Lift and Escalator Industry Association (LEIA) Practical Management of a Lift/Escalator Contract or IOSH Managing Safely course (or equivalent), to ensure lift safety programmes are managed effectively. If this level of qualification is not held by a member of the Property Team, we will use a suitably qualified advisor.

- 12.2** The Approved Code of Practice for LOLER states

You should ensure that the person carrying out a thorough examination has such appropriate practical and theoretical knowledge and experience of the lifting equipment to be thoroughly examined as it will enable them to detect defects or weaknesses and to assess their importance in relation to the safety and continued use of the lifting equipment.

Therefore, only suitably competent lift consultants and contractors, registered with the Lift and Escalator Industry Association (or equivalent), will be appointed to undertake thorough examinations, risk assessments, prepare examination schemes and undertake lifting equipment works.

- 12.3** We will check that our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will provide evidence for these checks and each contractor's certification appropriately.

13 Training

- 13.1** We will deliver training on this policy and the procedures that support it, through appropriate methods including: team briefings; basic lift safety awareness training; and on the job training for those delivering the programme of lift inspections, planned maintenance and repair works as part of their daily work. A record of 'on the job training' will be recorded on our Learning and Development Platform.

14 Performance Monitoring and Compliance

- 14.1** We will report robust key performance indicator (KPI) measures for lift safety. These will be provided to Executive Team, Audit & Risk Committee and Board on a quarterly basis.

15 Quality Assurance

- 15.1** 100% of all certificated servicing and works carried out is subject to a quality assurance check by Honeycomb Group Insurance Provider.
- 15.2** We will carry out an internal audit of lift safety at least once every two years, to specifically to test compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

16 Non-compliance

- 16.1** Our definition of non-compliance is: any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a Honeycomb employee becoming aware of it.
- 16.2** Any non-compliance issue identified at an operational level will be formally reported to the Head of Property in the first instance, who will agree to an appropriate course of corrective action with the Director of Operations and report details of the same to the Executive Team. Non-compliance incidents will be reported to the Executive Team as soon as the incident is known about/reported, who will then escalate to the Board once reviewed and in full receipt of all information. This will be escalated to the Board by the Director of Operations.
- 16.3** In cases of serious non-compliance, Executive Team and Board will consider whether it is necessary to self-refer the issue to the Regulator of Social Housing as required by their regulatory framework, or any other relevant organisation such as the Health and Safety Executive, with advice/guidance from the Head of Property.

17 Data Protection

For processing, storing and sharing the personal data associated with this Policy, we will ensure that it is carried out in accordance with current data protection legislation (UK GDPR and Data Protection Act 2018).

18 Linked policies and procedures

- Health and Safety Policy
- Lift Safety process flow chart
- No Access procedure

19 Review

This policy shall be reviewed every three years, and a review may be required earlier if there is a legislative or regulatory requirement or significant change

