

Health & Safety Policy Statement

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HEALTH & SAFETY POLICY STATEMENT

Health and safety is integral to the success of the business and VBG recognises its duty to comply with health and safety legislation, codes of practice and any relevant standards or guidelines.

VBG are committed to achieving high standards of health and safety in relation to all of its colleagues, those affected by its business activities and those attending its premises. The group demonstrates its commitment by defining roles, allocating responsibilities, and delegating authorities, to facilitate effective H&S management.

The Health and Safety Steering Group is responsible for planning, reviewing, and implementing health and safety policies, systems and practices.

Managers and team leaders are accountable for the health and safety of colleagues working under their direction.


VBG communicates, consults, and engages with colleagues, in health and safety matters. Colleagues are made aware of the hazards in their working environments and are adequately trained so they can carry out their duties in a safe manner.

Colleagues are expected to share in the commitment to health and safety, and follow all safe working policies, procedures, training, and instruction to enable compliance with statutory duties.

Health and safety performance data, including accidents and incidents, is reviewed with a system of continual improvement promoted.

Reviews of policies, procedures, risk assessments and the setting of goals, objectives, and action plans, take place annually, as a minimum.

On behalf of the VBG Board



Ian McLaughlin,
Chief Executive Officer
1st November 2023

THE COMPANY, VANQUIS BANKING GROUP LTD

Vanquis Banking Group (VBG) is a specialist bank for people in the UK who are not well served by mainstream lenders. Established in 1880, VBG is one of the UK's leading suppliers of personal credit products to the non-standard lending market.

VBG is a unified group made up of Vanquis (cards and loans) and Moneybarn. While they all offer different products and services, they each share the common purpose to help put people on a path to a better everyday life.

RESOURCES & INFRASTRUCTURE

Resources and organisational infrastructure will be suitable and sufficient to establish, implement, maintain, and continually improve the effectiveness of the health and safety management system. The infrastructure and work environment includes:

- Buildings and associated utilities
- Human resources
- Financial resources
- Equipment including hardware and software
- Information and communication technology

The Management Representative is to identify the resources required to establish and maintain the management system. As new technology becomes available, the possibility of introducing it to improve the management system is to be considered.

ROLES, RESPONSIBILITIES & AUTHORITIES

The responsibility, accountability and authority of all personnel involved in the management system is defined, documented, and communicated:

- Responsibilities, accountabilities, and authorities are documented throughout the management system and in job descriptions.
- Supplier and Contractor responsibilities and accountabilities are documented by Procurement Team and the responsible Account Manager.
- Visitor responsibilities are communicated by the applicable Manager organising the visit.

ORGANISATIONAL STRUCTURE

The company recognises that the structure of the organisation needs to constantly evolve in order to meet the changing needs of clients, the market and compliance obligations. Group Executive Committee are responsible for ensuring the structure of the organisation is appropriate to the current business needs.

F1. H&S ORGANISATIONAL STRUCTURE



LEADERSHIP TEAMS (BOARD, GROUP EXECUTIVE COMMITTEE)

The VBG Chief Executive Officer (CEO) acts as the Accountable Person responsible for health, safety and welfare, ensuring that health and safety management is set firmly in the context of corporate governance and corporate social responsibility.

The Group Chief Operations Officer acts as the designated Executive with ultimate responsibility for compliance on health and safety within VBG. Executives are accountable to the Board for the health and safety of all within their area of responsibility. Responsibilities include:

- Ensuring that health and safety responsibilities are correctly assigned.
- Providing resources to meet regulatory and other health and safety requirements.
- Demonstrating leadership and commitment to health and safety.
- Managing and taking responsibilities for corporate decisions being in accordance with health and safety management systems and policies.
- Keeping health and safety management issues on the executive agenda.
- Representing health and safety, corporately and publicly.
- Ensuring that the VBG CEO is appropriately informed of any significant health and safety matters.

HEALTH & SAFETY

The Senior Health and Safety Manager acts as the VBG H&S Management Representative. Responsibilities include:

- Monitoring and communicating information on changes in legislation, regulations, codes of practice, newly identified hazards, health and safety products, and new working practices.
- Establishing and implementing an appropriately controlled management system in accordance with management standards and best practice.
- Developing health and safety policies, processes, and procedures to deliver their intended outputs.
- Ensuring the integrity of the management system when changes are planned and implemented.
- Facilitating appropriate training and guidance to enable colleagues to work safely with due regard to health and welfare.
- Liaising with regulatory bodies e.g., Health and Safety Executive; Fire Authorities Environmental Health Services; etc.
- Conducting management system reviews and implementing action plans for continual improvement.
- Reporting health and safety performance to the Health and Safety Steering Group and providing professional advice and guidance.

PROPERTY & FACILITIES

Property and Facilities are responsible for the management of services and processes. Responsibilities include:

- Directing, coordinating, and planning essential services such as reception, security, maintenance, mail, archiving, cleaning, catering, waste disposal and recycling.
- Ensuring buildings meet health and safety requirements and that any alterations comply with statutory obligations under health and safety legislation.
- Maintenance of premises, plant and equipment, ladders, mobile elevated work platforms; elevators; lifting equipment; installed pressure systems etc.
- Identifying hazards at local level and ensuring risk assessments are developed, suitable and sufficient.
- Ensuring site logbooks, schedules and records are kept up to date and are available for information and audit purposes.
- Coordinating health and safety activities with occupants of the building.

- Managing and monitoring contractors, goods, and services in relation to facilities, building maintenance, and planned / reactive works.
- Acting members of the Health and Safety Steering Group.
- Ensuring appropriate health and safety training has been provided to the Property & Facilities team, fire marshals, wardens and first aiders.
- Responding appropriately to emergencies, security, or urgent issues as they arise.
- Performance reporting to demonstrate pre-planned maintenance compliance; CDM applicable projects; H&S activity undertaken; accident and incident data etc.

DIRECTORS, HEADS OF, MANAGERS & TEAM LEADERS

All personnel who manage other colleagues have a vital role in shaping the health and safety culture of VBG. Responsibilities include:

- Leading by example, at all times.
- Providing adequate resources, personnel, and finances, to ensure that health and safety is managed effectively.
- Ensuring that assigned H&S roles, responsibilities, policies, procedures, and objectives are communicated and understood.
- Ensuring colleagues are aware of their contribution to the effectiveness of the management system and potential consequences of non-compliance with health and safety requirements.
- Holding colleagues accountable for carrying out assigned responsibilities.
- Actively promoting and participating in health and safety campaigns and initiatives.
- Ensuring that when business decisions are being made, health, safety and welfare considerations are included as an integral part of planning and implementation.
- Providing clear direction and taking responsibility for ensuring that all factors are considered which could lead to ill health, injury, or loss.
- Identifying hazards and risks that would affect those under their immediate control and making informed decisions about risk in their areas, seeking support when required.
- Ensuring near misses and accidents are reported and where applicable investigated in accordance with the appropriate procedure.
- Reviewing health and safety performance regularly and giving feedback to colleagues and the health and safety team.
- Participating in health and safety management reviews, where applicable.
- Maintaining as appropriate, easily retrievable records of health and safety matters.

COLLEAGUES

Responsibilities include:

- Adhering to the requirements of health and safety policies, procedures, local arrangements, and work instructions.
- Working in a safe manner, with awareness and concern for the health and safety of themselves and others.
- Promptly reporting any unsafe conditions, faulty equipment, hazards/risks, accidents, incidents or concerns to the team leader, manager, and H&S safety team.
- Co-operating in the investigation of accidents and incidents.
- Participating in health and safety training offered.
- Making full use of protective clothing or equipment provided (if applicable).
- Following relevant policies and procedures when working away from the normal workplace (e.g., client's premises, work in the community etc).
- Taking responsibility for own visitors and for informing them of relevant health and wellbeing procedures.

EMPLOYEE REPRESENTATIVES & COLLEAGUE FORUMS

Colleagues have the opportunity to be involved in the development, implementation, and operation of safe workplace practices as part of the Colleague Forums.

Employee representatives are elected, engaged, and consulted on topics such as: policy reviews; hazards and risks; new equipment and new work processes; accidents and incidents; changes that affect workplace safety etc.

Colleague Forum meetings are scheduled and recorded by Human Resources.

HEALTH & SAFETY STEERING GROUP (HSSG) - TERMS OF REFERENCE

The following are the terms of reference of the Health and Safety Steering Group (HSSG) of Vanquis Banking Group and its subsidiaries: PFG Corporate Services Limited (PFGCSL), Vanquis Bank Limited (VBL), Moneybarn Limited (MBL), Cheque Exchange Limited (CEL).

1. **Authority**

The HSSG has been established by the Director of People Services under the authority delegated by the VBG Board. The HSSG is authorised to agree VBG's health and safety policy and approach. The HSSG has authority to take appropriate actions to ensure health and safety requirements are being met.

2. **Purpose** – The purpose of the HSSG is to:
 - Satisfy itself of the overall adequacy and effectiveness of health and safety strategies; systems; policies; and practices to deliver the business objectives;
 - Ensure compliance with health and safety legal and regulatory requirements;
 - Support the VBG Board in discharging its responsibility for health, safety and welfare of their employees and other stakeholders.

3. **Principal Responsibilities** – The Steering Group’s responsibilities include:
 - Annual review (or more frequently in the event of major organisational change or new procedure or work processes impacting health and safety), of the policy together with the systems and working practices regarding health and safety, making changes as are considered appropriate;
 - Considering the size and distribution of the undertaking and risks involved and ensure that the appointed members are given adequate information and resources to enable them to fulfil their functions effectively;
 - Reviewing health and safety risk reports and directing actions required to retain risk exposure within VBG Board approved risk appetite;
 - Reviewing risk assessments regularly, aiming for continual improvement;
 - Reviewing health and safety governance within VBG;
 - Taking responsibility for the oversight of health and safety performance for locations and operations within its scope;
 - Determining remedial measures and making recommendations relating to health and safety performance and monitoring compliance;
 - Considering health and safety incidents and absence data, so as to ensure that management identify and implement any corrective action considered appropriate in order to achieve compliance and raise performance where required;
 - Reviewing training compliance data to ensure suitable health and safety awareness, training and guidance is provided to relevant persons;
 - Reporting matters to the board to allow them to consider reviewing health and safety performance and discharge their duties. Taking all reasonable and practicable steps to maintain a safe and healthy working environment which complies with statutory requirements and any changing statutory requirements.

4. Membership and Chairman

Members shall be appointed by the Director of People Services.

Members of the HSSG shall be:

- Director of People Services (Chair)
- Head of Talent (Deputy Chair)
- Head of Business Partnering and Change
- Head of People Services
- Senior Health and Safety Manager
- Inclusion & Wellbeing Manager
- Business Services and Resilience Director
- Head of Property & Facilities
- Building Services Manager
- Property & Facilities Manager, North
- Property & Facilities Manager, South

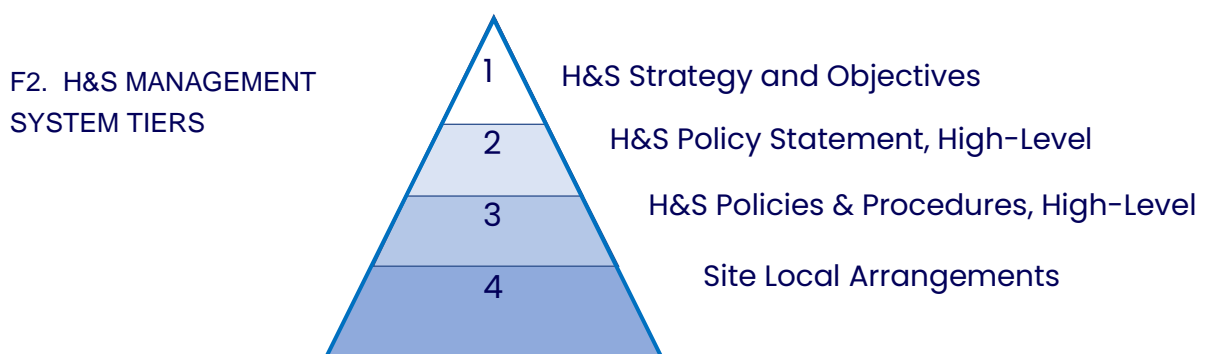
The Director of People Services will be the chair. In their absence, the Head of Talent will act as chair.

The Enterprise Risk Director (or their deputy) shall receive an open standing invite. Additional attendees and observers may attend a meeting upon invitation to present reports and or other information as appropriate, provide expert advice, or act as a subject matter expert.

H&S DOCUMENTATION

Policies, procedures, and processes are in place to ensure that work activities and hazards are suitably controlled. The H&S policies and management system are aligned to the requirements of the International Standard ISO:45001.

The management system is reviewed regularly to ensure it is current, including suitable version control, approvals, and retention requirements. The scope of the VBG management system incorporates all its entities.



The management system (Tiers 1-3) are developed by the Senior Health and Safety Manager in conjunction with the VBG Health and Safety Steering Group.

The VBG nominated Executive approves and signs off the H&S Strategy and high-level H&S Policy (Tiers 1-2).

High-level policies and procedures (Tier 3) are consulted with the site H&S representatives and authorised by H&S Steering Group Chair.

Local arrangements, work instructions and processes (Tier 4) are developed by the site H&S Representative or nominated responsible person.

Managers are responsible for the implementation of the management system, within their area of control.

H&S STRATEGY, OBJECTIVES & PLANS

The Health and Safety team document the strategy annually and establish measurable health and safety objectives, with consideration to:

- Business strategy and operational requirements
- Hazards and risks
- Legal and other requirements
- Performance data results
- H&S steering group input
- Colleague forum and stakeholder consultation
- New technologies and systems
- Continual improvement

In addition, VBG sites may also develop their own H&S goals and objectives, applicable to their business, building or area. A H&S responsibility matrix is maintained to plan and measure the delivery of the VBG objectives and strategy. Performance against the objectives is also periodically monitored during the H&S Steering Group meetings and other review meetings, as applicable.

RISK MANAGEMENT

All tasks, environments, equipment and substances are risk assessed where significant hazards are identified, to ensure they are adequately controlled, and risks reduced to acceptable levels. Examples of significant H&S hazards include, but are not limited to:

- Building Hazards
- Display Screen Equipment
- Driving at Work
- Manual Handling
- New & Expectant Mothers
- Office Working

- Emergency Response
- Event Management
- Fire Safety
- Hazardous Substances
- Infectious Diseases
- Lone Working
- Home Working
- Slips, Trips & Falls
- Volunteering in the Community
- Young Workers & Work Experience
- Working at Height
- Mental Health

Complex tasks are reinforced with a method statement and inherently dangerous tasks require a permit-to-work. A methodology for hazard identification and risk assessment is provided in the management system.

Associated Document/s:

[Risk Assessment Policy](#)

[COSHH Policy](#)

[Risk Assessment Template](#)

[Manual Handling Policy](#)

[Display Screen Equipment Policy](#)

[Mental Health & Wellbeing Policy](#)

[Lone Working Policy](#)

[Driving at Work Policy](#)

TRAINING & COMPETENCE

Training can play a vital part in reducing the risk of a workplace accident. Providing effective health and safety training ensures colleagues know how to work safely without risk to themselves or to others.

Competence is the ability for colleagues to recognise the risks in operational activities and then apply the right measures to control and manage those risks.

When a colleague commences work, mandatory H&S Essentials training is provided to all colleagues, which includes an awareness of:

- Health and safety responsibilities
- Key health and safety hazards
- Risk controls to implement
- H&S resources and communication tools
- Emergency processes

H&S Essentials refresher training is provided annually. Further H&S training needs are identified and mapped for all colleagues, specific to their role. Records are maintained of training status and completions.

Internal training is delivered by eLearning modules or conducted by appropriately skilled and competent trainers with relevant experience, depending upon the subject matter. H&S training may also be performed by external service providers.

Thereafter, training and development needs are assessed as and when applicable, at 121 meetings and/or during performance review meetings.

Contractors visiting site must be inducted prior to commencement of work. Records of the induction are to be retained. During the induction they will be advised of any potential hazards/risks together with information about required control measures and emergency procedures.

Associated Document/s:

[H&S Training Needs Matrix](#)

[H&S Essentials eLearning](#)

[Contractor Management \(H&S\)](#)

COMMUNICATION & AWARENESS

The health and safety management system, policies and procedures can be found in Health & Safety, BeSafe on the intranet, Stay Connected.

H&S noticeboards are available in all office locations and provide various information, including details such as the Employee Assistance Provider (EAP), First Aiders, Emergency Evacuation plans/routes etc.

The Health and Safety Law Poster provides an overview of key responsibilities, H&S contacts and what to do if there is a H&S problem or concern.

Internal communication and awareness of management system information includes, but is not limited to:

- Colleague Forums
- Health & Safety Steering Group
- Local H&S Representative Meetings
- Quarterly H&S Performance Report
- Annual H&S Report
- Internal Communications
- BeSafe, intranet Stay Connected
- Annual H&S Essentials eLearning
- Annual H&S Toolkit eLearning

When appropriate, significant issues are communicated by the responsible Executive to the Board.

External communication and awareness of management system information includes, but is not limited to:

- Liaison with industry experts and associations
- Review of legislative and other requirements
- Supplier and Contractor contracts
- Contractor and Visitor guidelines
- Health & Safety site inductions
- VBG company website

Communication planning and tracking is maintained by the Communications and Engagement Team for key PF Internal Communications issued.

Associated Resources/s:

[Health & Safety, BeSafe](#)

BUILDING HAZARDS

Systems and processes are required across all sites to manage the health and safety risks associated with building operations and maintenance activities, and to provide adequate and appropriate welfare facilities for all colleagues and third parties.

The Property and Facilities Teams for each building, confirm on a quarterly basis, that the required controls are in place and operating effectively to manage all building health and safety matters, such as: asbestos, air conditioning, cleaning, emergency lighting, fall protection systems, fire safety systems, lift service inspections, water treatment etc.

Associated Document/s:

[Building Operations & Maintenance Policy](#)

PROCUREMENT, CONTRACTOR MANAGEMENT

VBG recognises its legal responsibilities to ensure the health, safety, and welfare of all contractors, so far as is reasonably practicable, working on its premises or on behalf of the company. Equally, every contractor employed by VBG is legally responsible for their own safety, and anyone affected by their work-related activity.

Health and safety controls are in place for:

- Contractor Selection and Approval
- Contractor Site Visits
- Site specific Risk Assessments and Method Statements

- Permits to Work for High-Risk Work
- Procurement of Plant, Equipment, Substances
- Performance Monitoring

Associated Document/s:

[Contractor Management \(H&S\) Policy](#)

[Construction, Design and Management \(CDM\) Policy](#)

[Procurement Policies](#)

ACCIDENT & INCIDENT MANAGEMENT

Accident and incident management systems are in place to enable accidents, incidents, and cases of work-related ill-health to be appropriately reported, documented, and investigated, with controls put in place to prevent recurrence.

Associated Document/s:

[Accident Reporting and Investigation Policy](#)

[Accident Incident Form](#)

EMERGENCY PREPAREDNESS & RESPONSE

Emergency situations may arise out of identified or unidentified hazards, which could threaten the health and/or safety of colleagues and other third parties. Procedures and guidance are in place for emergency preparedness and response, across VBG, supported by Business Continuity plans.

Associated Document/s:

[Accident Reporting and Investigation Policy](#)

[First Aid Policy](#)

[Fire Safety Policy](#)

[Personal Emergency Evacuation Plan \(PEEP\) Policy](#)

[Bomb Threats & Suspicious Packages Policy](#)

[H&S Essentials eLearning](#)

[Fire Safety Team eLearning](#)

[Terrorism Training](#)

PERFORMANCE EVALUATION & IMPROVEMENT

Performance measurement is vital for the business to find out where it operates relative to its health and safety objectives and targets.

The effectiveness of the hazard and risk control arrangements, processes and procedures are monitored and analysed to help identify where improvements are needed. This is measured against relevant statutory standards, KPIs, accident and incident statistics, training status, enforcements notices, compliance data etc.

Reporting metrics are in place to ensure an appropriate level of governance and management review takes place on a monthly, quarterly, and annual basis.

The Health and Safety Steering Group reviews performance data to examine trends; to assess the overall adequacy and effectiveness of strategies, systems, policies, and practices; and to identify areas for continual improvement.

Site H&S Representatives undertake regular reviews to evaluate compliance with legalisation and policy requirements. Workplace inspections are undertaken by the Property and Facilities teams. The group Internal Audit team schedule intermittent H&S audits to provide assurance over the adequacy and effectiveness of controls.

Associated Document/s:

[Audits & Inspections Policy](#)

[Performance Monitoring & Evaluation Policy](#)

LEGAL & REGULATORY REQUIREMENTS

Relevant health and safety legislation and other requirements are identified within the H&S legislation register as and when changes and/or additions occur.

The means of ensuring notification of changes and/or additions include:

- Updates from government or industry bodies, such as the HSE, IIRSM, IOSH etc.
- Advice from internal legal teams.
- Information from external legal or consulting organisations.

The Health & Safety Steering Group are notified of changes and/or additions to legislation on a quarterly basis. The Colleague Forum is consulted on such changes and/or additions, where applicable. All changes, additions and updates are integrated into the management system and communicated to colleagues, and other stakeholders via policy or procedure updates, training, guidance, and communications, as applicable. Each site is responsible for allocating clear responsibilities for compliance with legal and regulatory requirements, and monitoring compliance on an ongoing basis.