Pest Infestations Policy and Procedure

Approved by: Executive team

Date of Approval: March 2026

Policy Author: Helen Jones, Head of Safety Assurance

Policy Lead: Jen Griffiths, Customer Services Directorate

Date of next review: March 2027

Version control:1

V.0, Feb 2026	Draft
V.1, Sep 2026	Final

You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the BP Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements.

Should colleagues require any reasonable adjustment to allow for engagement with this document please contact the policy lead

Contents

1 Procedure Statement and Purpose 3
2 Policy commitments (key objectives) 3
3 Linked documents 3
4 Legal and other requirements 3
5 Scope and context 4
6 Roles and responsibilities 5
7 Training and competency requirements 6
8 Information and communication 6
9 Operational risk controls (procedure) 8
10 Change management 10
11 Procurement and contractor management 10
12 Emergency preparedness and response 10
13 Data, documents and records management 10
14 Measurement of success 11
15 Internal and external audit 11
16 Improvements 11
17 Delivery and management review 11
18 Data protection 11
19 Equity, diversity and inclusion 11
20 Definitions 12

1 Procedure Statement and Purpose

Brighter Places (BP) recognises its duty of care as an employer, landlord and developer. The aim of this policy is to set out the key principles and commitments for the management framework for pest infestations in line with all relevant statutory obligations and sector best practice.

BP also recognises its responsibility to protect colleagues, customers, and contractors from health, safety, and wellbeing risks associated with pest infestations[1] such as bed bugs, fleas, cockroaches, and rodents. Pests can cause discomfort, allergic reactions, and operational disruption, but with appropriate precautions, risks to health and safety can be minimised.

Colleagues are required to cooperate and comply with this policy and procedure in ensuring BP fulfils its duties. Failure to adhere to this policy and procedure may have significant impacts on safety with resulting legal and financial consequences. This may include legal action by the Health and Safety Executive (HSE) or the Regulator for Social Housing (RSH) resulting in significant fines and a downgrade of the overall Governance rating of BP as a registered provider.

2 Policy commitments (key objectives)

BP is committed to preventing, identifying, and managing pest infestations effectively across all properties and workplaces. The health, safety, and wellbeing of residents, staff, visitors, and contractors will be protected by controlling risks associated with pests infestations.

All infestations will be assessed and promptly treated by competent, licensed pest control contractors[2]. The organisation will minimise disruption to residents and operations while infestations are investigated and resolved.

Clear arrangements will be in place for reporting, monitoring, and recording pest infestation incidents, and for providing guidance on roles and responsibilities.

3 Linked documents

- BP Health & Safety Policy
- BP Infestation Risk assessment
- Dealing with Bed Bugs
- BP Accident and Incident Reporting Procedure
- Prescribed Hazards in Housing Policy and Procedure

4 Legal and other requirements

This policy operates in the context of the following key legislation:

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

- COSHH Regulations 2002 (as amended)
- Public Health (Control of Disease) Act 1984
- Housing Act 2004
- Housing H&S Rating System Regulations 2005
- Prescribed Hazards in Housing Regulations 2025

5 Scope and context

5.1 Persons

Applies to all BP colleagues, contractors, visitors, entering or working in BP properties or offices

5.2 Premises

Applies to all BP-managed offices, communal spaces, supported housing, and customer homes. This will include low-cost home ownership (LCHO) properties where they may be affected by infestations within low-cost rental accommodation (LCRA), or common parts, as part of wider building safety considerations. Where infestations are identified this will be referred to as the 'affected property[3]', irrespective of tenure.

5.3 Objectives

BP will comply with all relevant statutory obligations listed in section 4 and commit to the following:

- Protecting the health and safety of colleagues, customers, and contractors.
- Ensuring pest infestations are managed promptly and professionally.
- Preventing the spread of pests between sites and properties.
- Providing colleagues with information, instruction, and PPE as required.
- Maintaining accurate records of infestations and treatments.
- Ensuring colleagues are aware of reporting and escalation procedures.

5.4 Context

Applies to all business activities where colleagues may encounter or manage infestations and sits within the context of the Corporate and supporting strategies to provide 'Safe, high-quality homes' for BP customers.

For the purposes of this policy and procedure, the following are included in the definition of 'pest infestation' - bed bugs, cockroaches, flies, fleas, rats and mice, birds or any other prolific insect, rodent or avian infestation that may cause harm to human health.

Pests such as Ants, that can easily be sorted by over the counter remedies are excluded from this Policy / procedure.

Special attention should be given to vulnerable customers where identified such as children, elderly, pregnant women or those suffering long term health conditions.

6 Roles and responsibilities

6.1 Customer Services Director (Policy Owner)

Accountable for:

- Leading the implementation, oversight and review of this policy
- Ensuring prompt and proactive maintenance and cleaning of common parts to minimise the likelihood of infestations including cleanliness, hygiene, waste management and control of plant overgrowth
- Ensuring Customer Service teams act promptly and effectively to any reports of pest infestations
- Ensuring Customer service teams provide adequate support to customers who may be experiencing pest infestations
- Ensuring colleagues are protected from exposure to pest infestations so far as is reasonably practicable and in line with risk assessments
- Ensuring adequate oversight of this policy and procedure to monitor the effectiveness

6.2 Homes Director

Accountable for:

- Ensuring Homes teams have prompt and proactive planned and reactive repair programmes in place to minimise the likelihood of pest infestations including structural integrity, integrity of internal and external sanitation and drainage, and communal maintenance.

6.3 Head of Safety Assurance

Responsible for:

- Oversight of the implementation of this policy and its aims
- Ensuring all legal and best practice compliance requirements are met
- Oversee communication and training requirements.
- Providing adequate and competent advice and support to the business to assist them in meeting their roles and responsibilities.

6.4 Facilities Manager

Responsible for:

- Coordinating and managing pest control in BP offices.
- Providing PPE for colleagues visiting infested properties.

6.5 Colleagues

Responsible for:

- Record infestations in Housing Management system using a warning marker[4] for all affected premises and/or blocks, and update when certified safe.
- Notify Pest Control Contractor and affected residents promptly.
- Support customer communications and isolate affected areas.
- Be familiar with the Pest infestation risk assessment and control measures
- Complete incident report for confirmed or suspected infestations.
- Notify relevant contractors who may enter the premises of any 'live' cases
- Do not enter properties with a Warning marker, unless authorised by senior management. Where entry is unavoidable, staff must act with caution and must use full PPE (hazmat suit, gloves, shoe covers).
- Follow all safety and hygiene guidance when entering or leaving customer properties.

7 Training and competency requirements

7.1 General Awareness

Guidance and training shall be provided for all frontline colleagues, including how to recognise pest infestations and prevent spread. This will be included within the HHSRS and Prescribed Hazards in Housing training.

7.2 Refresher Training

All HHSRS and Prescribed Hazards in Housing training will need to be refreshed according to certificate expiry dates or as determined necessary, within 1 to 3 years depending on role and risk level.

7.3 Training Records

Records must be kept of all training and awareness delivered in line with this policy in the BP Learning Management System (Eloomi).

8 Information and communication

8.1 Customers

Residents in affected properties will be informed promptly of any infestations that may impact on them. This will include all direct neighbouring properties where there is strong evidence of spread. Guidance will be provided to help them stay safe and minimise disruption. Refer to BP website for bed bug guidance.

8.2 Colleagues

Staff must report all suspected or confirmed infestations immediately on the Housing management system. They will receive instructions to maintain a safe working environment.

8.3 Contractors

Licensed pest control contractors will provide prompt information on assessments, treatments, and outcomes. Relevant updates will be shared with staff and residents to ensure safety and compliance. Any contractors due to undertake work in affected properties must be notified so they can take preventative action. Hazard and risk identification

8.4 Infestation in BP Property:

- Do not enter properties with a Warning marker, unless authorised by senior management. Where entry is unavoidable, staff must act with caution and must use full PPE (hazmat suit, gloves, shoe covers).
- Use disposable shoe covers when entering all properties
- Report any sightings immediately
- Leave the property at once if contact occurs
- Inspect clothing, shoes, and belongings before entering vehicles
- If you suspect contamination of clothing, shoes or belongings then follow decontamination guidance for high heat wash, dry or sealing and freezing items that cannot be washed
- Refer to and follow the "Dealing with Bed Bugs" guidance notes
- Update Warning marker following confirmation and after the property has been certified safe

8.5 Infestation in BP Office:

- Follow instructions from the Facilities Manager
- Do not enter isolated or restricted areas
- Report any sightings via the Incident reporting procedure
- Inspect clothing and belongings before leaving the premises or entering vehicles
- If you suspect contamination of clothing, shoes or belongings then follow decontamination guidance for high heat wash, dry or sealing and freezing items that cannot be washed

8.6 Infestation in Communal or Shared Housing Areas:

- Restrict access to affected units while allowing safe use of unaffected communal areas
- Notify Pest Control Contractor and Housing Management immediately
- Advise residents on isolating affected areas and cleaning protocols
- Encourage regular monitoring of shared spaces (corridors, laundry rooms, lounges, etc.)

- Display notices if treatment is in progress
- Housing Team to coordinate with Pest Control for site-wide inspection
- Provide residents with reassurance and information leaflets
- Update Orchard system with UDC markers for affected flats

9 Operational risk controls (procedure)

9.1 Occupied premises

9.1.1 Investigation

Under Awaab's law; BP will act swiftly to investigate fully before assigning any responsibility to a resident and to identify when resident behaviour (e.g. waste, clutter) is contributing. We should not place the onus on the resident to sort the problem, whilst they may have a part to play, they may not be the root cause, we should identify the problem and support the resident to resolve it.

If the problem is widespread, we should step in immediately to control the risk of further spread.

1. Notify contractor to respond, investigate and treat
2. Determine customer responsibility and vulnerability
3. Determine ability to pay, recharge or contribute %

We will only attend if the pest activity is in the main domestic property, not the gardens or sheds.

As a general rule for Chargeable Repairs

- Communal / shared areas: we will always attend promptly to prevent the spread of pests to neighbouring properties.
- Flats: We will attend promptly to prevent the spread of pests to neighbouring properties. We will recharge where appropriate.
- Houses: The resident is generally responsible for initial control, with staff providing advice and guidance. However, where a vulnerability or affordability issue is identified we will initiate the response and recharge where appropriate.
- Shared owners: The resident is responsible for initial control, with staff providing advice and guidance. However, where there is a risk of spread to other properties, we will initiate the response and recharge.

Please be mindful that if a resident lives in a house and is struggling to deal with the situation, we should try to advise what they can do, and possibly step in to help the situation, this may mean a recharge to their account to cover the costs or a referral to help them access hardship funds.

9.1.2 What we will do

Where BP is responsible, immediate containment measures will be implemented, and licensed pest control contractors will be engaged to treat the infestation, this may mean more than one visit.

Residents will be advised on safety precautions and actions to minimise exposure.

Once the Pest infestation has been controlled, there should then be timely repairs to make good where needed.

Records of actions, and outcomes will be maintained for monitoring and accountability.

9.1.3 Moving home temporarily due to a pest infestation

If BP arranges pest control treatment and that treatment requires the resident to be away from their home for a few hours, they will be expected to make arrangements to do so e.g. by visiting family or friends.

If a property is uninhabitable, please refer to the Decant policy.
This excludes Bed bug infestations due to risk of spread.

The presence of pests, and any associated treatment/repair work, does not automatically mean a resident must be moved out temporarily. An assessment will be made based on the advice of the pest control expert, taking into account any extenuating factors presented by the resident and health/care professionals.

If the tenant is responsible for the infestation, we may apply a chargeable repair.

9.2 Void properties

All vacant properties will be inspected for pest activity prior to re-letting.

Any infestations identified will be treated promptly by licensed contractors to ensure the property is safe for occupation.

9.3 Office premises

Preventive measures such as regular inspections, hygiene standards, and proper waste management will be maintained.

Licensed contractors will be engaged where infestations occur, and updates will be communicated to relevant staff to minimise disruption.

Records of all incidents, actions, and outcomes will be kept for monitoring and review.

10 Change management

Any changes relevant to this policy, including new legislation or sector best practices, must be assessed for health and safety impacts and documented accordingly. Changes affecting policy objectives must be agreed by the Policy Owner.

11 Procurement and contractor management

BP will ensure contracts and service level agreements are in place with all contractors responsible for Pest Infestation. Contractors will be subject to a robust assessment process. Contractor RAMS must include infestation control measures.

12 Emergency preparedness and response

12.1 Incident response

In the event of a Pest and Infestation emergency:

- Leave immediately and prevent others from entering.
- Check and decontaminate personal items.
- Notify Pest Control Contractor.

12.2 Incident reporting

All Pest Infestation incidents; including tenanted or void properties, communal areas or office premises, must be reported on the BP incident reporting system.

12.3 Investigation

All incidents will be investigated thoroughly. Findings and lessons learned will be reported to the Executive and/or relevant committees.

12.4 Incident analysis

Incidents will be analysed to establish trends and opportunities for improvement in systems and procedures.

13 Data, documents and records management

- UDC marker and Pest Control reports must be recorded in Orchard.
- Incident reports and photographs retained in SharePoint.
- All records held for minimum 3 years.

14 Measurement of success

It is not deemed necessary to have a performance measure for infestations at this point. However, where UDC markers are used we can report on this and identify significant trends which may need to be monitored in future.

15 Internal and external audit

This policy may be subject to internal audit processes as part of ongoing business critical compliance checks.

16 Improvements

16.1 Non-conformity reports

Non-compliance issues will be reported and addressed with appropriate corrective actions.

16.2 Corrective action tracking

Non-conformities must be addressed with timely corrective actions. All safety-related non-conformities will be treated as high priority.

17 Delivery and management review

17.1 Delivery

All aspects of this policy will be implemented through the established procedures. Reporting and assurance will be provided to the Board as part of the wider safety assurance framework.

17.2 Management review

The policy will be reviewed at least every three years to ensure its effectiveness and compliance.

18 Data protection

Any personal data created or used in the application of this Policy must be done so in line with the BP Data Protection policy and employee privacy notice.

19 Equity, diversity and inclusion

This policy and procedure support BP’s commitment to equity, diversity, inclusion and safety of all customers, colleagues, contractors, and members of the public. It applies to the health, safety, wellbeing, and protection of all, and support will be provided to any identified vulnerable persons.

Where required, reasonable adjustments will be considered to support colleagues to engage with this Policy. Please speak to Human Resources for assistance.

20 Definitions

[1] Pest infestation – the presence of unwanted pests such as bed bugs, cockroaches, flies, fleas, rats and mice, birds or any other prolific insect, rodent or avian infestation that may cause harm to human health

[2] Pest Control Contractor: An external licensed provider responsible for assessing and treating infestations.

[3] Affected Property: Any property or area confirmed or suspected to contain a pest infestation.

[4] UDC Marker: 'Unsafe Due to Contamination' marker used in Orchard Housing to denote an affected property until certified safe.