

# Health and Safety Policy and Statement

June 2021

## 1 Policy statement

- 1.1 An effective Health and Safety policy requires the full collaboration and co-operation of all employees therefore everybody is required to read this document and accept their personal responsibility for Health and Safety at work.
- 1.2 This policy applies to all employees (temporary and permanent). This includes casual workers, agency workers and volunteers and, for this purpose, Board Members. It also promotes positive health and safety practices that will ensure that any potential risks to our customers and the general public, through delivery of our daily working practices are fully mitigated.
- 1.3 Rooftop Housing Group (RHG) will, for the purpose of meeting its requirements for the Health and Safety of temporary workers, agency workers, casual workers and volunteers as far as is reasonably practicable, regard such workers as they would their permanent employees in respect of risk assessment, training, the provision of information and protective equipment.
- 1.4 All employees are required to co-operate to ensure the successful operation of this policy. Those with a contract of employment, who are in clear breach of this policy will be subject to the Disciplinary policy and procedure.
- 1.5 In addition to any disciplinary action which may be taken for breaches of personal responsibility for Health and Safety, in the case of breaches of statutory requirements individuals may be held personally liable under the law. Examples of misconduct may include:
  - Failure to wear Personal Protective Equipment (PPE).
  - Failure to adhere to RHG's safe systems of work.
  - Unauthorised use of work equipment.
  - Gross misconduct may include a serious breach of RHG's Health and Safety rules, policies, or procedures.
- 1.6 All RHG locations will be covered by this policy. Any deviations necessary will be published and made known to all employees.
- 1.7 Any actions and decisions reached will consider the provisions of the Equality Act 2010 and consideration of individuals' needs. Where specialist medical advice may be needed, this will be sought before any decisions are made.

## 2 Statutory and Regulatory context

- 2.1 The regulatory requirements for Registered Providers require that RHG should comply with all relevant legislation, regulatory standards, and guidance. As such, RHG is committed to complying with Health and Safety legislation as a minimum and continually improving its performance.
- 2.2 The Statement of Intent, detailed below meets the legal obligation placed upon RHG under Section 2 of the Health and Safety at Work etc. Act 1974 to provide the appropriate written statement in relation to the above.

### **3 Policy outline**

3.1 RHG's Health and Safety policy includes:

- Statement of Intent outlining RHG's commitment to developing a positive attitude to Health and Safety management.
- The arrangements for managing Health and Safety – this policy, supported by approved group practices, procedures and detailed safety rules, applies to all activities carried out by, or on behalf of, RHG and developed to identify, control, monitor and review Health and Safety issues.
- Health and Safety responsibilities - RHG recognises that all employees have a responsibility for Health and Safety and are accountable for ensuring a safe working environment. RHG also recognises that identifying key roles either individually or collectively is appropriate in certain circumstances and this policy identifies such roles (duty holders) and their responsibilities.

3.2 RHG will maintain a Health and Safety Committee. The committee provides both a consultation process and forum where relevant Health and Safety issues can be raised, scrutinised, and monitored to gain assurance that suitable, effective solutions to achieve compliance are being delivered.

3.3 RHG will maintain and record accidents, incidents and near misses within the organisation. Such accidents, incidents and near misses will be investigated to determine root causes and subsequently implement corrective action to prevent further occurrences. All accidents, incidents and near misses will be reported to the Health and Safety Committee.

3.4 Continuous improvement and best practice will be identified and monitored regularly by the Health and Safety Committee.

3.5 All operations are monitored by line managers and Team Leaders. During this process, operations are monitored to any appropriate operating procedure (this may be RHG's procedure, or a standard operation procedure provided by a manufacturer). Where there are contractors and/or sub-contractors working for RHG they are monitored against their own published Health and Safety plan/procedures.

3.6 All employees can access the Employee Handbook electronically which includes extracts from the Health and Safety policy.

### **4 Health and Safety policy – Statement of Intent**

4.1 We recognise the positive benefits from developing and maintaining a high level of safety both for our employees, customers and external partners who help deliver our services. It is our policy, as an organisation, to maintain high standards and to encourage our employees to contribute to their own welfare, and that of their colleagues.

4.2 RHG remains committed to working with our customers to strengthen our relationship with them and as a responsible landlord we fully support the 'Together with Tenants Charter' launched by the National Housing Federation (NHF). We will ensure that we positively communicate and encourage engagement with our customers in identifying and mitigating health and safety risks / issues, whilst also ensuring they have a voice and can hold us to account in everything we do.

4.3 It is our intention to take all reasonable and practicable steps so that those responsibilities for health, wellbeing and safety matters are effectively assigned, accepted, and fulfilled at all levels within our organisation. In doing so, we will:

- Ensure safety awareness, positive attitudes, and continuous improvement in safety performance with the commitment and active involvement of Board Members, directors, respective line managers and employees at all levels.
- Protect the Health and Safety of its employees and others that may be affected by its activities.
- Provide and maintain a safe working environment which does not constitute risks to health and welfare.
- Allocate sufficient resources to operate and maintain safe and healthy places of work.
- Provide PPE, as required for work areas and activities, ensuring its proper use in accordance with manufacturer guidelines or instruction.
- Ensure adequate information is clearly displayed on specific hazards applicable to each site.
- Provide fire protection, first aid and health monitoring facilities.
- Take account of advice and guidance issued by functional managers with responsibility for health, safety, and environmental issues, and establish and provide the necessary training.
- Formulate standards that comply with relevant statutory requirements in respect of health, safety, and the environment, as they affect employees, customers, contractors, and the public.
- Safeguard employees and others from foreseeable hazards, regarding health, safety, or the environment, in current processes and working systems by undertaking appropriate risk assessments applicable to the work activity involved.
- Ensure that when new substances, plant and equipment, processes or premises are introduced, adequate guidance, instruction and supervision are provided through risk assessments being carried out and the results communicated.
- Provide training and awareness to all employees to be aware of their own responsibilities in respect of health, safety, and environmental matters, and to ensure they participate fully in measures required to prevent accidents and industrial disease.
- Ensure that employees are clear on how to report Health and Safety concerns and incidents.
- Ensure that identified role specific Health and Safety training is carried out within identified timescales.
- Ensure that any Health and Safety refresher training is delivered to employees within appropriate timescales.
- Maintain accurate records of all Health and Safety training undertaken.
- Ensure that contractors are told of the high standards expected by RHG, and that they can demonstrate, through any approved procurement process, that any person/s working on behalf of RHG, is competent and properly trained to undertake their work without detracting from the contractor's own legal responsibility.
- Use health education and counselling to promote good health and to avoid occupational and non-occupational injuries and diseases.
- Establish procedures for monitoring compliance with safety standards and co-operate with authorities and technical organisations to ensure policies and group practices are kept up to date.
- Ensure these objectives are fulfilled through in-house auditing activities, either internally through competent assessors or external auditors.

4.4 The Health and Safety at Work etc. Act 1974 requires every employee while at work to take reasonable care for the Health and Safety of themselves, and of other persons who may be affected by their acts or omissions and to co-operate with their employer in fulfilling its statutory duties. As such, we expect the co-operation and contribution of all our employees in successfully achieving the aims and objectives set out above by:

- Not interfering with, or the misuse of anything provided in the interest of Health and Safety.
- Reporting any unsafe practices or situations immediately.

*B. Worrall*

14<sup>th</sup> July 2021

Signed: .....

Date: .....

Boris Worrall, Group Chief Executive

## **5 Health and Safety advice**

5.1 The Safety & Compliance Manager, and Health & Safety Officer with support (where required) from external Health and Safety Consultants/specialists will provide competent support and advice to managers and staff in the technical and statutory aspects of safety at work as and when requested to do so. Where questions arise over the maintenance of safe working practices or conditions, matters can be referred to a Leadership Team member, Executive Director or the Group Chief Executive who then has the responsibility for ensuring that sufficient authority is given to enable safe practices and the appropriate Health and Safety arrangements, are being maintained.

5.2 RHG will liaise with the local Health and Safety Executive (HSE), Environmental Health Officers, Fire and Rescue Service and other specialist agencies, as necessary. To obtain specialist advice or assistance on Health and Safety matters, RHG may use the services of additional external safety practitioners as may be appropriate.

## **6 Communications**

6.1 All employees, both existing and new, will be made aware of this document and their own Health and Safety responsibilities. Employees will be kept informed of all Health and Safety issues relevant to their work activities, including the results of risk assessments.

6.2 This will be achieved through the following internal channels:

- Notices and posters
- Emails and posts on Workplace
- Induction process and training
- Health and Safety Committee
- Leadership Team meetings
- Health and Safety/hazard reporting procedures
- Health and Safety audits

6.3 Outside RHG through contact with:

- Health and Safety Consultant
- HSE

- Regional Fire Services
- Environment Agency
- Local Authorities
- Regional and national Health and Safety working groups/forums
- Association of Safety and Compliance Professionals (ASCP)

6.4 Receipt of correspondence from any enforcing authority indicating their intention to act against RHG, must be brought to the immediate attention (within 24 hours) of the Group Chief Executive or, in his absence an Executive Director.

## 7 Organisational arrangements

- 7.1 Group Chief Executive – The general direction of Health and Safety at work is delegated to the Group Chief Executive, Housing Director, People Director, Development Director and Finance Director, and in turn their management teams, in respect of responsibility and authority for the effective execution of approved policies, as specified in the Duty Holder and Responsible Persons Schedule (Please refer to **Appendix 2**).
- 7.2 The Housing Director will be supported by the Head of Assets & Facilities and where required, external Health and Safety Consultants and Specialists. The preparation of advice and guidance is the primary means by which directors and line managers gain an understanding of the issues involved with Health and Safety.
- 7.3 The Health and Safety Committee will consist of a member of the Board, a member of the Executive Team, Risk and Assurance representatives, Senior Management (Heads of Service / Leadership Team), Employee representatives, a Residents Excellence Panel (REP) representative and Safety and Compliance representatives. Minutes of the meetings will be made available to all employees, Audit and Risk Committee and Board.
- 7.4 Operational managers, duty holders and responsible persons will ensure safe working conditions and will have access to the Health and Safety Committee via an appropriate member of the committee, or alternatively be appointed to the committee.

## 8 Responsibilities

- 8.1 The Board will ensure there is an effective Health and Safety policy for RHG and periodically appraise its effectiveness.
- 8.2 The Group Chief Executive as duty holder will ensure:
- That Health and Safety performance will be included as an agenda item at Executive Team meetings and when new information needs to be communicated or when there are changes in process or legislation, or issues have arisen that need to be discussed.
  - Health and Safety is included in an annual report to Board.
  - Awareness of major hazards, ensuring that a process is in place for periodic checks to guarantee that approved safety precautions are being carried out.
  - The objectives and responsibilities outlined within the Health and Safety policy Statement of Intent are communicated to all employees and that duty holders and responsible persons understand, actively support, and implement the Health and Safety policy and group practices.
  - Maintain interest and enthusiasm for Health and Safety amongst employees.
  - That managers are aware of statutory legislations, common law and codes of practice affecting their area of operation.

- That RHG's activities are conducted in such a way that the public are not exposed to risks to their Health and Safety.
- 8.3 Ultimate responsibility for Health and Safety rests with the Group Chief Executive as Duty Holder.
- 8.4 The Directors as Duty Holders will:
- Establish Health and Safety arrangements/procedures for RHG.
  - Make sure that RHG's Health and Safety policy is communicated and understood at all levels.
  - Ensure all managers understand, actively support, and implement the Health and Safety policy, group practices and procedures.
  - Take a direct interest in such arrangements and procedures and publicly support all persons implementing them.
  - Arrange for employee training as required.
  - Maintain interest and enthusiasm for Health and Safety amongst all RHG employees.
  - Receive reports, information and recommendations from RHG's consultants and arrange, through their managers, to give effect to the decisions on all aspects of Health and Safety in accordance with the Health and Safety at Work Act 1974 and other statutory enactments or codes of practice which may be issued from time to time.
  - Be aware of major hazards and that managers make periodic checks to ensure that approved safety precautions are being carried out.
  - Be aware of statutory legislation, common law and codes of practice affecting RHG's area of operation.
  - Advise managers on matters arising under the Health and Safety at Work Act 1974.
  - Report to the Group Chief Executive and Board on the effectiveness of the Health and Safety policy, as implemented through responsible persons and other managers, and recommend any amendments to the Health and Safety policy to meet changes in organisation, legislation or to improve safety standards.
- 8.5 Responsible persons and managers ensure the Health and Safety of employees at work in their department. They must therefore:
- Contribute to and fully support the Health and Safety policy.
  - Ensure their team members are instructed and trained so that they fully implement the Health and Safety policy, group practices and procedures.
  - Be informed about statutory legislation, common law, and codes of practice as it affects their department.
  - Continuously monitor safety performance in their department and initiate action to reverse adverse trends.
  - Maintain interest and enthusiasm for safe working amongst all employees.
  - Ensure access to all fire exits, alarm buttons and fire extinguishers are available.
  - Ensure appropriate PPE is available and used.
  - Ensure that contractors under their direction carry out their work according to RHG policy and conditions laid down in the 'Contractors Code of Conduct' document.
  - Ensure prompt attention is given to repair and maintenance requirements.
  - Set a good example, especially by using appropriate PPE.
- 8.6 All employees are responsible for:

- Making themselves familiar with and observing RHG's Health and Safety policy, group practices, procedures, and safety rules.
  - Taking all due care for the Health and Safety of both themselves and their fellow employees, wearing and using appropriate PPE as required and in accordance with manufacturer instructions.
  - Co-operating with RHG in the implementation and observation of all statutory requirements.
  - Not misusing or interfering with anything provided by RHG in the interest of Health and Safety at work.
  - Reporting all accidents, incidents hazards to their immediate line manager if there is an immediate Health and Safety risk and ensue, they are reported through appropriate forms on Workplace
  - Attending all Health and Safety mandatory and role specific training as required.
- 8.7 RHG and 'non-employees' (tenants, leaseholders and other stakeholders) – RHG recognises and accepts it has a duty, so far as is reasonably practicable, not only to its employees but also to prevent risk of injury to others including tenants and leaseholders, partners/contractors, visitors and members of the public.
- 8.8 Employees are charged with the responsibilities for visitors and contractors and they should observe the directions on this matter that are contained in relevant group practices and policies.
- 8.9 Group practices, risk assessments and any control measures implemented by RHG will also therefore take into consideration the Health and Safety of these other groups. Specifically, RHG will:
- Consider risks to non-employees when carrying out their work activities to ensure compliance with safe systems of working.
  - Provide any relevant and appropriate information where identified to non-employees in a timely manner to minimise risk of injury.
  - Report any defects in maintenance and repair of premises, plant, or equipment immediately so that remedial action can be taken.
  - Prevent contact with any substance which could lead to a risk of injury or ill health.

## **9 Training**

- 9.1 The identification of Health and Safety training requirements will be a line management function carried out in consultation with employees as part of the recognised and published Learning and Development policy.
- 9.2 The Workforce Development plan identifies, by role, what Health and Safety training is appropriate to each employee.
- 9.3 All employees are given Health and Safety training appropriate for the work they do.
- 9.4 All employees are given general Health and Safety training as part of their induction or when changing jobs within RHG.
- 9.5 Mandatory and induction training is identified and arranged as part of the training plan and induction process. Managers or supervisors may also identify specialised training requirements for Health and Safety and liaise with the Head of Human Resources and consult with the Workforce Development plan.
- 9.6 Arrangements for the training of new employees, including temporary workers, and subsequent instructions in safe working methods, are undertaken by the employee's line manager and Human Resources department.

## **10 Welfare arrangements**

- 10.1 Every effort is made to provide the most suitable type of PPE for the job. Where the need for PPE has been identified, it must always be worn in the designated areas. Any non-compliance of wearing of equipment or misuse will result in disciplinary action being taken. Serious breaches could result in dismissal.
- 10.2 Monitoring of contractors is carried out to ensure, as far as is reasonably practicable, that appropriate standards will be maintained in occupational health, safety, welfare, and environmental matters.
- 10.3 Arrangements exist for the observance of special regulations covering young people, new and expectant mothers, and employees with a permanent or temporary disability.
- 10.4 To ensure that good hygiene is encouraged, RHG provides appropriate facilities. All such facilities will be maintained in a clean and healthy condition.
- 10.5 Disciplinary action may be taken if employees are found to misuse any welfare provisions provided.

## **11 Occupational Health and Safety risks**

- 11.1 A register of the occupational Health and Safety risks associated with RHG's activities is kept and maintained.
- 11.2 The risk assessment register is regularly updated with information, in the light of accident reviews and the performance of RHG generally. The record of the risk assessment will include information regarding young people.
- 11.3 Under the Management of Health and Safety at Work Regulations 1999, there are responsibilities toward young people, which are:
  - To assess risks to all young persons under 18 years of age before they start work.
  - To ensure the risk assessment considers psychological or physical immaturity, inexperience, and lack of awareness of existing or potential risks.
  - To introduce control measures to eliminate or minimise the risks, so far as is reasonably practicable.
  - To let the school or parents/guardians of any children, still of compulsory school age and below the minimum school leaving age, know the key findings of the risk assessment and the control measures introduced before the child starts work or work experience.
  - To address certain specified factors in the risk assessment.
  - To take account of the risk assessment in deciding whether the young person should be prohibited from certain work activities, except in specified circumstances.

## **12 Records**

- 12.1 Records will be maintained of audits and the resultant corrective action will be taken to demonstrate compliance. Records of risk assessments and other statutory documents demonstrating compliance with statutory requirements will be kept in line with best practice.

## **13 Review**

- 13.1 This policy will be reviewed annually, subject to changes in legislation and/or best practice.

- 13.2 The Executive Team, Leadership Team, and Health and Safety Committee have been identified as the appropriate channels through which associated policies, group practices and risk assessments will be discussed and approved prior to distribution and implementation.
- 13.3 The review of safety performance will remain a primary task of the Executive Directors supported by line managers.

## 14 Consultation

- |      |                             |           |
|------|-----------------------------|-----------|
| 14.1 | Leadership Team             | June 2021 |
| 14.2 | Executive Team              | June 2021 |
| 14.3 | Health and Safety Committee | June 2021 |

## 15 Responsibilities

- |      |  |  |
|------|--|--|
| 15.1 | <b>Responsible body</b>                        | Board of RHG   |
| 15.2 | Formulation and approval of policy             | Board of RHG   |
|      | Amendments to policy                           | Executive Team   |
|      | Monitoring of policy                           | Leadership Team  |
|      | Operational management of policy/policy author | Head of Assets & Facilities  |
| 15.3 | <b>Duty holders</b>                            | Group Chief Executive<br>Housing Director<br>Development Director<br>People Director<br>Finance Director |
| 15.4 | <b>Date of formulation of policy</b>           | September 2003   |
| 15.5 | <b>Dates of policy reviews</b>                 | June 2021<br>June 2020<br>July 2019<br>November 2018   |
| 15.6 | <b>Date of next review</b>                     | June 2022  |

## Associated documents

### Internal – RHG policies and procedures

- Capability Policy and Procedure
- Code of Conduct - Contactors
- Disciplinary Policy and Procedure
- Employee Handbook
- Equalities and Diversity Policy
- Lift Safety Policy
- No Access Policy
- Fire and Bomb Evacuation Procedure
- Health and Safety procedures
- Local arrangements documents
- Induction Procedure

### Group practices

- Accident and Incident
- Asbestos
- Blood borne viruses and bodily fluids
- Consultation with employees
- Display screen equipment
- Driving at work
- Drug and alcohol
- Electricity at work
- Fire safety
- First aid at work
- Legionella
- Lone and working at home
- Manual handling
- New and expectant mothers
- Personal protective equipment
- Risk assessment

### External

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Equality Act 2010
- Social Housing White Paper
- Building Safety Bill
- All other Health and Safety legislation and regulations as quoted in the above Group Practices

## Appendix 2



### Duty Holders and Responsible Persons for Health Safety and Landlord Compliance– June 2021

**Duty Holder** is the person(s) who has overall responsibility for ensuring full compliance and has the ability to influence change and the budget to implement it.

#### Responsible person

Operationally will be the person(s) able to implement processes which ensure compliance and have the capacity to advise the Duty Holder.

Title	Duty Holder	Responsible persons
Health and Safety Policy	Group Chief Executive	Development Director Finance Director Housing Director People Director
Accident and Incident Group Practice	Group Chief Executive Housing Director People Director	Head of Assets & Facilities Safety & Compliance Manager
Asbestos Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Head of Assets & Facilities Head of Housing Head of Programme Delivery
Blood Borne Pathogens and Bodily Fluids Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Head of Assets & Facilities Head of Housing Head of Human Resources

<b>Title</b>	<b>Duty Holder</b>	<b>Responsible Person</b>
Consultation with Employees Group Practice	Group Chief Executive Housing Director People Director	Head of Assets & Facilities Head of Human Resources
Display Screen Equipment Group Practice	Group Chief Executive Housing Director Development Director People Director Finance Director	Line Managers
Driving at Work Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Line Managers
Drugs and Alcohol Group Practice	Group Chief Executive People Director	Head of Human Resources Head of Assets & Facilities
Electrical Safety Policy	Group Chief Executive Development Director Finance Director Housing Director People Director	Head of Assets & Facilities Head of Programme Delivery Head of Housing Head of ICT
Electricity at Work Group Practice	Group Chief Executive Housing Director Development Director	Head of Assets & Facilities Head of Programme Delivery Head of Housing Head of ICT Safety & Compliance Manager
<b>Title</b>	<b>Duty Holder</b>	<b>Responsible Person</b>
Fire Safety Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Head of Assets & Facilities Head of Housing Head of ICT Safety & Compliance Manager
First Aid at Work Group Practice	Group Chief Executive People Director	Head of Human Resources

		Head of Assets & Facilities
Gas Servicing Policy	Group Chief Executive Development Director Finance Director Housing Director People Director	Head of Assets & Facilities Safety and Compliance Manager
Legionella Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Head of Assets & Facilities Head of Programme Delivery Head of Housing
Lift Management and Maintenance Policy	Group Chief Executive Development Director Finance Director Housing Director People Director	Head of Assets & Facilities Head of Risk & Assurance Head of Programme Delivery Safety & Compliance Manager
Lone and Home Working Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Line Managers

<b>Title</b>	<b>Duty Holder</b>	<b>Responsible Person</b>
Manual Handling Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Line Managers
New and Expectant Mothers Group Practice	Group Chief Executive Housing Director People Director	Head of Human Resources Head of Facilities & Assets
Personal Protective Equipment (PPE) Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Line Managers
Risk Assessment Group Practice	Group Chief Executive Development Director Finance Director Housing Director People Director	Line Managers