

Health and Safety Policy



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Relevant National Standards or Regulations	• Regulator of Social Housing (RSH) Safety & Quality Standard (Consumer Standards, April 2024) • Management of Health and Safety at Work Regulations 1999 • Workplace (Health, Safety and Welfare) Regulations 1992 • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) • Provision and Use of Work Equipment Regulations 1998 (PUWER) • Manual Handling Operations Regulations 1992 (MHOR) • Personal Protective Equipment at Work Regulations 1992 (as amended 2022) • Control of Substances Hazardous to Health Regulations 2002 (COSHH) • Health and Safety (First Aid) Regulations 1981 (as amended) • Health and Safety (Display Screen Equipment) Regulations 1992 (as amended) • Regulatory Reform (Fire Safety) Order 2005 • Fire Safety (England) Regulations 2022 (where applicable) • Construction (Design and Management) Regulations 2015 (CDM) (for contracted works) • Gas Safety (Installation and Use) Regulations 1998 • Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 • Control of Asbestos Regulations 2012 (for any common parts) • Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) (if lifting equipment is used) • Housing Health and Safety Rating System (HHSRS) Operating Guidance (supports Housing Act 2004 duties)
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Relevant Legislation	• Health and Safety at Work etc. Act 1974 • Fire Safety Act 2021 (amends scope of the Fire Safety Order) • Housing Act 2004 (incl. HHSRS enforcement) • Landlord and Tenant Act 1985 (incl. s11 repairing obligations) • Defective Premises Act 1972 • Occupiers' Liability Act 1957 and 1984 • Corporate Manslaughter and Corporate Homicide Act 2007
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Health and Safety Policy

1. Purpose

This Health and Safety Policy outlines our commitment to providing a safe and healthy environment for our employees, tenants, contractors, and visitors. It is a **statutory policy** required by law for businesses with five or more employees, fulfilling our duties under the Health and Safety at Work etc. Act 1974 (HSWA). The purpose of this policy is to ensure we manage health and safety proactively – preventing accidents and work-related ill health, complying with all relevant UK legislation, and protecting everyone who may be affected by our operations (including tenants in our supported accommodation) **so far as is reasonably practicable**.

2. Scope

This policy applies to all aspects of our organisation's activities. It covers our employees, all properties we manage (including shared and communal areas in supported accommodation), and any contractors or volunteers undertaking work on our behalf. The policy addresses both workplace safety for employees and property-related safety for tenants. It encompasses offices, housing units and communal areas under our control, and all work activities carried out by the organisation. Everyone – from the Board of Directors to front-line staff and external contractors – has a role in adhering to this policy and maintaining a safe environment.

3. Responsibilities

- **Board of Directors:** The Board has ultimate responsibility for health and safety. They will ensure that health and safety is a core management priority and that sufficient resources (time, money, personnel) are allocated to implement this policy. The Board must review health and safety performance regularly and support continual improvement. They will also ensure that health and safety risks to tenants (as “non-employees” affected by our undertaking) are considered in strategic decisions.
- **Chief Executive Officer (CEO) – Mark Adams:** The CEO is the named **Competent Person** for health and safety (as required by Management of Health and Safety at Work Regulations 1999, Reg 7) and has day-to-day executive responsibility for ensuring this policy is implemented. Mark Adams will lead by example on health and safety, ensure compliance with all statutory requirements, and promote a strong safety culture. He is responsible for appointing additional competent persons and specialists as needed, and for reporting to the Board on significant health and safety matters. The CEO will sign this policy and any updates, demonstrating top-level commitment.
- **Health and Safety Advisors:** We have in-house qualified personnel to assist the CEO in fulfilling our health and safety duties. **Kate Plunkett** (NEBOSH General Certificate holder) will provide advice on general health and safety matters and assist with risk assessments, incident investigations, and staff training. **Peter McEleavey** (NEBOSH Fire Safety Certificate holder) will advise specifically on fire safety, including fire risk assessments and fire precautions across our properties. These advisors will keep up to date with legislation, support risk assessment processes, and act as points of contact for health and safety concerns. They will liaise with external authorities (e.g. HSE or Fire Service) as needed. While they have important advisory roles, ultimate accountability remains with the CEO and Board.
- **Line Managers/Supervisors:** Every manager is responsible for the health and safety of the staff and activities under their supervision. They must ensure risk assessments and safe systems of work are in place for tasks in their area, conduct regular safety checks, enforce safety rules (like use of personal protective equipment), and address any hazards or incidents reported by their team. Managers should also ensure that new employees or contractors



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under their direction receive proper induction and supervision. They will report any significant hazards or incidents to the CEO and work with the Health and Safety Advisors to remedy issues.

- **Employees (All Staff Members):** Every employee has a personal responsibility for health and safety under HSWA. Staff must **take reasonable care** of their own safety and that of others affected by their work. This means following the training and instructions provided, using equipment safely, wearing any required personal protective equipment, and adhering to all safety procedures and signage. Employees must **cooperate** with the organisation on health and safety matters – for example, by participating in training and risk assessments, and not misusing or interfering with anything provided for safety. Crucially, all staff are responsible for **reporting hazards, incidents, or near-misses immediately** to management, so that prompt action can be taken to prevent harm. No employee will be penalised for raising safety concerns.
- **Contractors and Visitors:** We will ensure that contractors working on our behalf (e.g. tradespeople, maintenance contractors) are aware of relevant risks and our safety rules. Contractors are expected to have their own health and safety arrangements and to work safely to protect our staff and tenants. We will provide contractors with any information about on-site hazards (e.g. asbestos, difficult tenants, etc.) and coordinate activities with them. All contractors must *cooperate* with us on safety matters and report any incidents or hazards they encounter. Visitors (including tenants when interacting with staff in offices or common areas) must also take reasonable care for their own safety and follow any instructions given to them (such as fire evacuation procedures). Our staff hosting or overseeing contractors/visitors are responsible for conveying relevant safety information and ensuring supervision as needed.

4. Legislation and Regulations

This policy is designed to meet the requirements of UK health and safety law and associated regulations. Key legislation relevant to our organisation includes:

- **Health and Safety at Work etc. Act 1974 (HSWA):** The primary law that imposes general duties on employers to ensure, as far as reasonably practicable, the health, safety and welfare of employees *and* other people who may be affected by our work (such as tenants and the public). This Act underpins all our health and safety efforts. Specifically, HSWA requires us to provide and maintain safe plant and systems of work, handle substances safely, provide information, training and supervision, ensure a safe workplace with safe access/egress, and produce a **written health and safety policy** (which this document fulfils).
- **Management of Health and Safety at Work Regulations 1999:** These regulations expand on the HSWA general duties by requiring a more systematic approach. Notably, we must **assess risks** to our employees and others arising from our work and record the significant findings (since we have >5 employees). We must also have arrangements for effective planning, organisation, control, monitoring and review of preventive measures. Regulation 7 requires the appointment of competent person(s) (we have named our CEO as a competent person, supported by NEBOSH-qualified staff). The Management Regulations also mandate **employee training and information** – we must ensure staff know the risks and controls in their work – and **cooperation and coordination** where we share workplaces or engage contractors.
- **Workplace (Health, Safety and Welfare) Regulations 1992:** These regulations cover basic health, safety and welfare conditions in our workplace environments. They apply to our office and any staff work areas (including maintenance workshops, etc.) and set minimum standards for things like ventilation, temperature, lighting, cleanliness, workspace size, safety of floors/traffic routes, sanitary conveniences and rest facilities. We are committed to complying



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with these standards to ensure our offices and any staff facilities in tenant properties are safe and healthy. For example, we will keep workplaces clean and tidy, ensure good lighting in common areas, maintain safe flooring (no tripping hazards), provide toilets and drinking water, etc., as required by these regulations.

- **Regulatory Reform (Fire Safety) Order 2005:** This legislation (often just called the Fire Safety Order or FSO) is the main law governing fire safety in workplaces and the common areas of residential buildings. It applies to *all* our workplaces and to the shared areas of buildings that house our supported accommodation tenants. Under the FSO, as the organisation in control of these premises (the “Responsible Person”), we must **undertake and document fire risk assessments** for each relevant property and implement appropriate fire safety measures. We must maintain fire precautions (e.g. alarms, extinguishers, emergency lighting), ensure clear escape routes, and provide fire safety information/training to staff and (where relevant) tenants. We already conduct annual Fire Risk Assessments at all properties and will continue to do so, reviewing them if there are changes or after any fire-related incident. Compliance with the Fire Safety Order is critical to protect life and property from fire.
- **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR):** RIDDOR is the law that requires us to report certain types of serious incidents to the authorities (the HSE) and to keep records of these incidents. We will comply with RIDDOR by reporting any work-related accident that results in death or a specified serious injury, any injury to a non-employee (e.g. a tenant or visitor) that results in them being taken to the hospital, any diagnosed occupational diseases, and any dangerous occurrences (near-miss events with high potential for harm). We also keep an internal log of all accidents and incidents, including those not reportable under RIDDOR, to monitor trends and improve safety. (See Procedures below for how staff should report incidents internally.)
- **Other Applicable Regulations:** Depending on specific activities, we will also adhere to regulations such as the Provision and Use of Work Equipment Regulations 1998 (safe use and maintenance of tools/equipment), Manual Handling Operations Regulations 1992 (assessing and reducing lifting/handling risks), Control of Substances Hazardous to Health Regulations 2002 (COSHH – safe use of chemicals like cleaning products or maintenance materials), Personal Protective Equipment at Work Regulations 1992 (providing and using suitable PPE where required), and The Gas Safety (Installation and Use) Regulations 1998 (annual gas safety checks in residential properties). While not all of these need detailed mention in this policy, we recognise our duty to comply with any regulations relevant to our work and will incorporate their requirements into our procedures and risk assessments.

Legal compliance is the baseline. This policy and our procedures will be updated as needed to reflect any changes in UK health and safety legislation or new regulations that apply to our operations.

5. Procedures and Arrangements

We have established the following procedures and arrangements to effectively manage health and safety risks in our organisation. These “arrangements” are the practical steps we take to fulfil the commitments made in this policy and to comply with the laws outlined above.

5.1. Risk Assessments: We will carry out **general risk assessments** for all our significant work activities and for hazards present in properties we manage. This includes assessing risks in our offices (e.g. display screen equipment use, electrical safety, slips/trips), maintenance tasks (e.g. working at height, use of power tools, manual handling), and residential support settings (e.g. hazards in common areas, risks to tenants from maintenance works). Every risk assessment will identify what could cause harm (hazards), who might be harmed (e.g. staff, tenants, contractors, public) and how, evaluate the



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likelihood and severity of potential harm (the risk), and determine suitable measures to **eliminate the hazard or control the risk**. Control measures will follow the hierarchy of control (elimination, substitution, engineering controls, administrative controls, PPE). We acknowledge that risk assessment is a legal requirement and the cornerstone of effective health and safety management – it enables us to proactively address dangers before they cause incidents. **Action:** The CEO (Mark Adams) will ensure that general risk assessments are completed and documented as soon as possible for all sites and key activities, since we currently need to improve in this area. Kate Plunkett (NEBOSH) will lead this process, involving relevant staff in identifying hazards and solutions. Significant findings and required actions from risk assessments will be recorded and communicated to all affected employees. We will review risk assessments at least annually or whenever there is a reason to suspect they are no longer valid (e.g. after an incident, or if there are changes to our operations or properties).

5.2. Property Safety Inspections: In addition to formal risk assessments, we will implement routine inspections of our properties (especially the shared/common areas in supported accommodation) to ensure they remain safe for tenants and staff. Our maintenance operatives will carry out **monthly safety inspections** of communal areas (hallways, stairwells, entrances, laundry rooms, etc.), checking for hazards such as trip/fall risks, inadequate lighting, damaged flooring, faulty locks or intercoms, etc. Any issues identified will be logged and addressed promptly (e.g. arranging repairs or additional cleaning). Fire safety features (alarms, extinguishers, emergency lights) in properties will be checked in line with our fire procedures (see Fire Safety below). These regular inspections serve as a proactive measure to keep the environment safe and well-maintained. Inspection records will be kept in the office for management review. The CEO will ensure that any patterns of recurring hazards are analysed and mitigated through longer-term maintenance or upgrades.

5.3. Accident and Incident Reporting: All accidents, incidents, and near-misses must be reported and investigated. Currently, staff report incidents by calling the office and the details are logged manually – we will formalise this process to ensure consistency and completeness. **Reporting Procedure:** If a work-related accident or incident occurs (to an employee, tenant, contractor, or visitor), the employee who becomes aware of it must *immediately* ensure anyone injured receives first aid or medical attention if needed, then report the incident to their line manager or the CEO as soon as possible, the same day. We will introduce a standard **Accident/Incident Report Form** (and maintain an Accident Book) to capture details such as date, time, location, people involved, nature of the event, injuries sustained, and any immediate actions taken. The completed report will be logged at the office and reviewed by management. **Investigation:** The Health and Safety Advisor (Kate or Peter, as appropriate) will investigate significant incidents to identify root causes and what corrective actions are needed to prevent recurrence. Investigations will be proportionate to the severity/potential of the event – even near-misses (no injury) will be examined for lessons learned. Mark Adams (CEO) will ensure that necessary corrective actions are implemented promptly (e.g. repairs, extra training, changes to procedures). We will also fulfil our external reporting duties: any incident that meets RIDDOR criteria (for example, a serious injury, a tenant taken to hospital due to our work activities, a dangerous occurrence, etc.) will be reported to the HSE in accordance with RIDDOR 2013. The CEO or a delegated competent person will make RIDDOR reports online or by phone as legally required, within the specified timeframes. All incidents and near-misses will be discussed at staff meetings or toolbox talks so that everyone can learn from them. **Aim:** Through diligent reporting and investigation, we aim to prevent reoccurrences and continually improve our safety management.

5.4. Emergency Procedures (Fire Safety and First Aid): We have established emergency plans to protect staff and tenants in critical situations:

- **Fire Emergency Plan:** For each office and each residential building, we manage, we have a fire emergency plan. This includes clear evacuation procedures, designated fire exit routes and



assembly points, and named fire marshals (among staff) where applicable. Fire drills will be conducted at our office annually (at a minimum) and at residential sites in coordination with any on-site staff or as part of tenant engagement (recognising that tenants are not employees but will receive basic fire safety notices). **Fire Risk Assessments** are carried out annually for all buildings with common areas, as required by law, and any significant findings (like need for improved fire doors, smoke alarms, emergency lighting) are acted upon. Peter McEleavey (NEBOSH Fire) oversees our fire safety program. He ensures that fire detection and alarm systems, extinguishers, and emergency lights are inspected and serviced regularly (typically by external qualified contractors) and that records are kept. All staff receive basic fire safety training, including how to raise the alarm, use extinguishers (if safe to do so), and assist in evacuation. Tenants are provided information on fire safety in their welcome packs and via notices in the properties (e.g. “Keep exits clear,” “What to do if you discover a fire”). We comply with the Regulatory Reform (Fire Safety) Order in maintaining general fire precautions and will cooperate with Fire Service inspections.

- **First Aid:** We will meet the First Aid Regulations by assessing our first aid needs. We will ensure at least one trained first aider or an “appointed person” is available to manage first aid arrangements. A first aid kit is kept at the office, and basic first aid supplies are provided to maintenance operatives for their vans. Employees must know who the first aiders/appointed persons are and where first aid kits are located. After any use of first aid, it should be logged in the Accident Book and reviewed to see if further measures are needed.
- **Other Emergencies:** For example, gas leak, power outage, serious violence/threat from a tenant – our employees are briefed on emergency contact numbers and steps (e.g. evacuate if gas smell and call National Gas Emergency line; in case of violent incident, retreat to safety and call police, etc.). These will be detailed in our staff handbook and reinforced in training.

5.5. Training, Instruction, and Supervision: Providing appropriate health and safety training and information to our team is a core part of this policy. All employees will receive **induction training** when they join, covering our health and safety policy, emergency procedures, incident reporting, and key risk controls relevant to their role. For office staff, induction includes display screen ergonomics, fire evacuation, etc., while maintenance operatives receive additional training on manual handling, working at height, use of tools, asbestos awareness (if working in older properties), and any other hazard pertinent to their duties. We note that the law requires employers to give employees understandable information and training about workplace risks and how to work safely. To meet this, we will:

- Conduct annual refresher training or safety briefings for all staff to remind them of critical procedures (like fire, first aid, reporting) and to update them on any changes in policy or law.
- Arrange specific certified training as needed. For example, sending our maintenance operatives to a **PASMA course** if they use mobile scaffolds, or a **working at heights** safety course. Likewise, office staff doing a lot of computer work will receive Display Screen Equipment training and workstation assessments.
- Ensure **supervision** is commensurate with experience: New or young employees will be closely supervised by their managers when undertaking tasks with potential risks, until they demonstrate competence. We encourage a culture where employees can ask questions if unsure about a task’s safety.
- Keep training records for each employee. Kate Plunkett will manage a training matrix to monitor who has received what training and when refreshers are due. The effectiveness of training will be evaluated (e.g. via spot checks or quizzes) to ensure knowledge is retained.

Additionally, toolbox talks or short briefings will be held (especially with maintenance staff) whenever new hazards emerge or after an incident, to reinforce safe practices.



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5.6. Maintenance of Plant and Equipment: We will ensure that all equipment used in our work is safe and well-maintained. This includes:

- **Work Equipment:** Tools and machinery used by maintenance operatives (e.g. power drills, lawn mowers, ladders) will be subject to regular checks. Employees must visually inspect tools before use and remove from service any defective equipment. We will have a planned preventive maintenance schedule for any significant machinery. Electrical equipment will undergo Portable Appliance Testing (PAT) at appropriate intervals to ensure electrical safety.
- **Personal Protective Equipment (PPE):** Where risk assessments identify the need for PPE (e.g. high-visibility vests, safety boots, gloves, eye protection for maintenance tasks, or masks/gloves for cleaning hazardous substances), the company will provide this PPE *free of charge* to employees. We will also provide training on the correct use and care of PPE. Employees are required to wear the PPE as instructed and report any damage or wear. We will replace PPE as needed.
- **Property Safety Systems:** Key safety installations in tenant properties (fire alarms, emergency lights, gas boilers, etc.) will be maintained per legal requirements and industry standards. For example, gas boilers/heating systems in our accommodation will receive annual servicing and Gas Safe inspections (with records and landlord gas safety certificates issued) in line with the Gas Safety (Installation and Use) Regulations. Electrical installations in properties will be inspected and tested at least every five years by a competent electrician (per Electrical Safety Standards in the Private Rented Sector regulations). Any lifts or similar equipment will be maintained and inspected according to the relevant regulations. While external contractors perform most of this specialist maintenance, our procedure is to schedule and document all required inspections to ensure none are missed.

5.7. Use of External Contractors: We rely on external contractors for the majority of maintenance and repair works on our properties (e.g. electricians, plumbers, builders). To ensure the safety of both the contractors and our tenants/staff during such works, we will implement a **contractor management procedure**. This will include:

- **Vetting and Selection:** We will **vet contractors for health and safety compliance** before engagement. This means we will verify that a contractor is competent and safe: e.g. checking they have relevant qualifications or accreditation (Gas Safe registration for gas engineers, NICEIC or similar for electricians), asking for copies of their own Health and Safety Policy and risk assessments/method statements for the work, evidence of training and any necessary licenses, and proof of adequate insurance. We will choose only contractors who can demonstrate they take health and safety seriously and work to legal standards. HSE guidance stresses selecting suitable contractors and assessing the risks of the work before it starts.
- **Pre-Work Coordination:** Before contractors start a job, a manager (or our Maintenance Operatives if they are overseeing the work) will brief them on any site-specific hazards we are aware of (for example, the presence of vulnerable tenants, locations of asbestos-containing materials as per our asbestos survey, fire alarm test schedules, etc.). We will agree on safety measures with the contractor – for instance, ensuring work areas are cordoned off to keep tenants safe, or scheduling high-risk work when tenants are not present if possible. We will also make clear our expectation that contractors work safely and comply with all relevant regulations (like using their own PPE, working at height safely, etc.).
- **Supervision and Monitoring:** While the work is ongoing, we will monitor contractors as needed. Our staff may perform spot checks to ensure they are working safely and not introducing uncontrolled hazards. If any unsafe practices are observed, we will stop the work until it is corrected. We will maintain good communication – contractors must inform us of



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any unexpected hazards or incidents immediately. Cooperation is a two-way duty; we will work together so that everyone on site remains safe.

- **Post-Work Review:** After the work is completed, we will review if it was carried out safely and address any issues (debrief). Only contractors who perform safely will be retained for future work. In summary, by improving our contractor vetting and oversight, we protect our tenants, staff, and the contractors themselves from accidents and ensure legal compliance when work is contracted out.

5.8. Monitoring and Review of Safety Performance: The CEO, with assistance from the H&S Advisors, will monitor our implementation of this policy. This includes:

- **Inspections and Audits:** We will periodically audit our health and safety system (either internally or using an external consultant) to check that procedures are followed (e.g. are risk assessments up to date? are incidents being properly reported? is training current? etc.). Any audit findings will be used to improve our processes.
- **Health & Safety Meetings:** Health and safety will be a standing agenda item in management meetings. At least quarterly, the team will review accident/incident reports, discuss any emerging hazards or trends, and track progress on any outstanding safety actions (e.g. repairs, training due).
- **Employee Consultation:** We will consult staff on health and safety matters, in line with HSWA and the Safety Representatives Regulations. Given our small team, this may be done informally through open discussions or during team meetings. Staff are encouraged to voice any concerns or suggestions for improvement. This collaborative approach helps us catch issues early and improve buy-in. (If a safety committee or representative is appointed in future, we will support that role as required.)
- **Record Keeping:** We maintain documentation as evidence of our compliance – including risk assessments, training records, maintenance logs, accident records, fire drill logs, etc. These records are reviewed for any indications of problems (for example, multiple incidents of a similar type might indicate a need for a new control measure).

By monitoring these various inputs, the organisation can measure how well we are controlling risks and where we may need to take additional action.

6. Review and Updates

This Health and Safety Policy will be **reviewed at least annually** to ensure it remains current and effective. A formal review will be conducted every year by the CEO (Mark Adams) in consultation with the Board and Health and Safety Advisors. We will also review the policy **whenever there are significant changes** to our organisation or operations – for example, if we take on a large number of new staff, start a new type of activity, move to new offices, or if new legislation comes into force that affects us. Additionally, if monitoring or an investigation reveals deficiencies in our policy (if an incident shows a gap in our procedures), we will update the policy accordingly.

Any changes to the policy will be clearly communicated to all employees (and explained in training or team meetings). The updated policy will be reissued, and staff will be asked to confirm they have read and understood it. For transparency, we will also communicate relevant policy changes to others as needed (for instance, informing contractors if we introduce new safety requirements for them, or advising tenants if we change any fire safety arrangements that impact them).

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Document Control: This policy is classified as a **“Statutory” policy (required by law)** and is approved by the Board of Directors. It takes effect from the date signed below and remains in force until superseded by a revised edition. The latest version will be available at our office and (upon request) to any employee, contractor, or relevant enforcing authority. All prior health and safety policy statements are rescinded by this document.