

Health, safety & environment policy

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| Description | Policy for the structure of occupational health, safety, wellbeing and environment (OHSWE) management within the Group. | | | |
| Created by | Health, Safety & Environment Manager | | | |
| Date created | 28 March 2023 | | | |
| Review date | 1 December 2028 | | | |
| Reviewed by | Co-Executive Team | | | |
| Version number | Modified by | Modifications made | Date modified | Status |
| 1 | HSE Manager | Policy incorporating new code of governance format as recommended by the National Housing Federation. Updates to responsibilities/accountabilities groups. Incorporation of statement of intents directly into procedures. Inclusion of FACTS into corporate values. | March 2023 | Final |
| 2 | HSE Manager | Removal of OHSWE Steering Group, title changes in Executive Team, responsibilities of removed groups added into existing groups. Rewording of responsibilities for team members around reporting customer property related hazards and occupational health screening attendance. | December 2025 | Approved |

1. Policy purpose

- 1.1 To ensure compliance with applicable Health, Safety and Environment legislation so far as is reasonably practicable by implementation of an appropriate Occupational Health, Safety, Well Being and Environmental (OHSWE) Management System.
- 1.2 To ensure that adequate resources shall be included in budgets, so that proper and appropriate provision can be made for 1.1.
- 1.3 To provide mechanisms to ensure that workplace risks are assessed, that suitable and sufficient procedures are put in place to address these risks, and appropriate control measures put in place and regularly reviewed.
- 1.4 To ensure that safe systems of work are provided and maintained.
- 1.5 To ensure all team members receive the necessary information, instruction, training and supervision appropriate to their role and others who may be affected by their actions and the Group's operations.
- 1.6 To ensure appropriate Occupational Health, Safety, Well Being and Environment (OHSWE) instructions and guidance is provided to customers, team members, contractors, visitors and where required, members of the public.
- 1.7 To ensure so far as is reasonably practicable that the working environment of all team members is safe and that adequate provision is made with regard to the facilities and arrangements for their welfare at work and for their overall well being.
- 1.8 To ensure work related accidents, near misses, occupational diseases, dangerous occurrences and environmental incidents are recorded, investigated, monitored and where required, reported to the Group's Regulators and appropriate enforcing authority.
- 1.9 To ensure that the health, safety and well being of team members and customers is placed at the heart of the Group Board's decision making.

2. Vision, purpose, objectives and values

Details of our vision and purpose, objectives and values are contained in our corporate plan, which are summarised below.

Our vision and purpose

We have a simple vision/purpose statement: *'Providing quality homes and services for better futures'*.

Our objectives

To enable us to achieve our vision and purpose we have a set of top-level objectives:

- Growth and development
- Culture
- Customer-centric

- Sustainability

These are described in further detail in our corporate plan.

Our OHSWE objectives will relate to and follow these top-level objectives.

Our values

Our values help us to make the everyday decisions about how things will be done. The values help to inform decision-making and guide the corporate planning process:

- Flexible
- Accountable
- Customer centric
- Trusting
- Supportive

These FACTS values will enable us to achieve our OHSWE objectives.

3. Policy statement

3.1 Our health, safety and environment policy statement can be found in **Appendix 1**.

4. Organisational structure

4.1 The current organisational structure for the Group can be provided on request.

5. Responsibilities and accountabilities

5.1 The leadership and accountability arrangements for the management of OHSWE are as follows:

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| Group Board | <p>The Group Board will:</p> <ul style="list-style-type: none"> • Approve the health, safety & environment policy. • Actively promote a positive culture of health, safety and environment throughout the Group. • Ensure there is an appropriate assurance mechanism in place over occupational health, safety, wellbeing and environment (OHSWE) operations to ensure compliance with relevant regulations and legislation. • Receive reports and monitor performance in relation to OHSWE. |
| Chief Executive | <p>The Chief Executive has overall responsibility for health, safety and environment.</p> <p>It is the role of the Chief Executive Officer (CEO):</p> <ul style="list-style-type: none"> • To ensure that an up-to-date health, safety & E environment policy is implemented. |

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| | <ul style="list-style-type: none"> • To ensure adequate resources are provided to allow the policy and its requirements to be suitably and sufficiently implemented. • To appoint competent persons to assist in enabling the Group to meet the requirements of relevant health, safety and environment regulations, legislation, codes of practice, guidelines etc. • To appoint and delegate key activities to a competent executive director to be responsible for occupational health, safety, wellbeing and environment (OHSWE). • Delegate the monitoring of OHSWE performance to the executive director lead. • Delegate the role of positively promoting all areas of OHSWE activities undertaken by the Group and to promote, encourage and uphold an effective and positive culture to the executive director lead |
| Group Director Finance & Growth | <p>The Group Finance & Resource Director is responsible for:</p> <ul style="list-style-type: none"> • Directing the OHSWE function. • Oversight of compliance and reporting to Board in accordance with approved strategies, policies and procedures. • Oversight of reporting to Board and Executive Team on OHSWE performance and risk mitigations. • Ensuring an organisation-wide management system is provided and maintained, to enable the business to operate safely and comply with the <i>Health and Safety at Work etc. Act 1974</i> and subsequent regulations under it, including environmental law. • Ensuring that sufficient resources, that reflect the OHSWE risks identified within the organisation, are available to implement this policy and that the organisation has adequate and competent health, safety and environmental advice and expertise. • Ensure that the Executive Team is kept informed of any significant OHSWE matters and the results of any investigations and root cause analysis. |
| Executive Team | <p>The Executive Team will be responsible for policy development. In particular:</p> <ul style="list-style-type: none"> • Reviewing the health, safety & environment policy before approval by the Group Board, approving minor changes to a revised policy. • Ensuring management comply with their responsibilities detailed in this policy and carry out their duties accordingly. |

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| | <ul style="list-style-type: none"> • Delivering effective OHSWE leadership and to promote, encourage and uphold an effective and positive culture. • As deemed appropriate, responsibilities can be delegated to the Customer Experience and Homes & Growth groups |
| HSE Forum | <p>The HSE Forum comprises of team representation across the organisation.</p> <p>It will:</p> <ul style="list-style-type: none"> • Ensure this policy and safe systems of work are fit for purpose and consistently deployed. • Monitor the implementation of this policy and any applicable documentation and safe system of work. • Check progress and monitor the risk assessment program, HSE initiatives, audits and inspections and actions arising from these. • Assign responsibilities for organising, planning, implementing, measuring, and reviewing the policy and its requirements. • Agree plans for improvement and reviewing progress on the development of the organisation and the policy. • Organise, plan, implement and review OHSWE activities • OHSWE aspects of new initiatives and approve significant changes to procedures and guidance. • Respond to the effects of new legislation, as well as enforcing authority reports and information releases. • Review accidents, incidents, occupational diseases, dangerous occurrences and near misses and make recommendations to ensure the health, safety and wellbeing of team members and others affected is maintained. • Have oversight, help remove any barriers to safe systems of working and report back to the Executive Team. • Promote, encourage and uphold an effective and positive culture, including the reporting of outcomes from Forum discussion. |
| Group Health, Safety & Environment Manager – including support from Assets HSE Training Manager | <p>The Health, Safety & Environment Manager provides competent advice to the business in accordance with regulation 7 of the <i>Management of Health and Safety at Work Regulations 1999</i>. They also act as a 'critical friend' to the business, providing assurance and direction of health, safety and environmental matters. They will:</p> <ul style="list-style-type: none"> • Give advice and guidance on matters pertinent to H • health, safety and the environment when requested. |

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| | <ul style="list-style-type: none"> • Offer advice in relation to legislative changes and collaborate with stakeholders in the implementation of such changes. • Review safety critical documentation, ensuring a streamlined and pragmatic approach. • Demonstrate strong health, safety and environmental leadership and ensure ownership is maintained at a local level. • Ensure the positive promotion of OHSWE matters. • Ensure active participation, involvement, compliance and consultation with all team members, operational management, Executive and Board groups regarding the planning and delivery of OHSWE matters. • Ensure a risk based approach is applied to operations throughout the organisation's activities. • Maintain and develop the health, safety and environmental management systems and OHSWE strategy. • Advise and support the HSE Forum and other relevant meetings • Make statutory reports on behalf of the Group. • Ensure training is fit for purpose and meets legislative requirements. • Lead on significant reported HSE incidents and internal investigations. Where required, lead on notification to enforcing authorities. • Approve key changes to OHSWE documentation including procedures, risk assessments, method statements, safe systems of work. • Develop and deliver OHSWE communications to all team members to raise subject awareness. • Promote, encourage and uphold an effective and positive culture. |
| Head of People & Development | <p>The Head of People & Development, alongside operational management is responsible for ensuring the provision of relevant training throughout the organisation. The Head of People & Development will:</p> <ul style="list-style-type: none"> • Ensure the availability and reliability of operational systems allowing management to define mandatory health, safety and environment learning needs of their team members. • Provide a suitable range of training to meet these needs, delivered through various means to support attendance. • Report on training compliance against mandatory training identified. • Ensure such training is delivered in a timely, suitable and sufficient way and where required, obtain feedback as to its suitability. |

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| | <ul style="list-style-type: none"> • Promote, encourage and uphold an effective and positive culture. • Manage the occupational health screening programme for team members |
| Technical leads | <p>Some higher risk areas of service delivery such as fire safety, gas, electricity, asbestos, damp, mould and condensation, Development Team etc require technical leads to ensure an appropriate and ongoing degree of focus on safety matters. Each technical lead has responsibility for OHSWE in relation to the design and management of projects and work streams under their control, including implementing adequate day-to-day health and safety arrangements during the course of the work.</p> <p>They are responsible for the design of safe working systems and the health and safety of customers, contractors, operatives and others who come into contact with ongoing projects. They are also responsible for ensuring compliance with all relevant health, safety and environment regulations and compliance with this policy and associated procedures.</p> <p>All technical leads will be suitably qualified, competent and have an awareness of health and safety, including regulatory requirements relevant to their areas of responsibility. Specifically, these responsibilities are to:</p> <ul style="list-style-type: none"> • Ensure that all risks in regard to projects or work streams are identified. • Implement control measures and produce any necessary safe systems of work along with adequate supervision and instructions to ensure projects/work streams are conducted safely. • Notify line management about any accidents, hazards or health and safety concerns in relation to projects/work streams. • Report all accidents and incidents via the HSE Incident Tardis/CRM software. They must also notify their operational line manager and the Health, Safety & Environment Manager. • Stop any dangerous or unacceptable practice when observed and take action to establish a safe system of work. • Work towards rectifying any hazards identified during the course of the work or post completion. • Ensure health, safety and environmental performance by contractors is one of the measured performance KPI's. • Provide support and assistance to the Procurement Team for reviewing contractor performance and competency. |

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| | <ul style="list-style-type: none"> • Co-ordinate work as required with any appointed external technical specialist. • Promote, encourage and uphold an effective and positive culture. |
| Operational managers (including team leaders and stand in deputies). | <p>Operational managers, team leaders and those formally recognised as deputising in their absence, have responsibility for implementing adequate OHSWE arrangements for their team members, contractors and customers on a day-to-day basis. They are responsible for ensuring the health, safety and wellbeing of team members, customers and all other affected by operations carried out under their remit. They are also responsible for ensuring compliance with relevant health, safety and environment legislation with regard to buildings or operations being managed by them.</p> <p>Operational managers will:</p> <ul style="list-style-type: none"> • Implement operational plans, management arrangements and control measures to eliminate or reduce risk. • Complete and review HSE risk assessments and implement appropriate controls/recovery measures in line with Group procedures and guidance. • Deploy resources and information to ensure all activities are carried out safely. • Ensure that all team members receive health and safety training and induction commensurate with their work activities and that this training is refreshed at appropriate intervals. • Provide timely feedback to line management on performance including successes and failures, and any deficiencies in plans, arrangements, systems or precautions relating to health, safety and environment. • To ensure that safety relevant defects are reported appropriately and rectified in a timely manner. • To ensure that health, safety and environmental risks are managed on-site in conjunction with competent team members, surveyors and contract managers until the defect is rectified. • Communicate with team members and ensure the participation of them, contractors and customers (as appropriate) in health and safety activities and documentation. • Implement the health, safety and environment policy and associated procedures within premises and operations under their control. • Ensure the delivery of appropriate training and induction to their team members and communicate OHSWE messages to relevant parties in an effective and timely manner. |

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| | <ul style="list-style-type: none"> • Ensure the details of all work related accidents, near misses, dangerous occurrences and occupational diseases are reported and investigated to identify cause and provide/implement recommendations to prevent re-occurrence. • Ensure that all risks are identified, that all risk assessments are undertaken in a suitable and sufficient manner and that relevant people are aware of the control measures in place. • Make sure that all risk and needs assessments undertaken for customers give due consideration to risks identified through the workplace risk assessment process (fire, fall from height, hot water etc.) • Implement control measures and produce any necessary safe systems of work along with adequate supervision and instructions to ensure tasks are conducted safely. • Notify line management about any hazards, accidents or if applicable, known significant medical conditions of their team members that could impact on health and safety compliance/performance. • Stop, report and investigate any dangerous or unacceptable activity witnessed or advised of, and take action to establish a safe system of work. • Ensure that when identified through risk assessment, suitable personal protective equipment is provided to team members and that a system for managing, cleaning and training in the use of the equipment is adopted. • Promote OHSWE awareness amongst team members (and customers as appropriate). • Make sure regular inspections and monitoring is undertaken so that premises, equipment and activities are carried out safely and remain fit for purpose. • Develop and maintain emergency response and business recovery plans. • Maintain and implement suitable and sufficient procedures for team members working away from the office including lone working, work on construction sites, customer and void properties, driving whilst at work, working from home and working at other locations. • When required, seek advice and guidance from the Health, Safety & Environment Manager on any HSE issue that requires addressing. • Promote, encourage and uphold an effective and positive health, safety and environmental culture. |
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| Team members | <p>Team members are integral to maintaining a positive culture and will ensure that workers have all they need to ensure the health, safety and welfare of themselves and others around them.</p> <p>Team members will:</p> <ul style="list-style-type: none"> • Cooperate with operational managers, complete required training and attendance to occupational health screening appointments. • Follow the health, safety and environmental policy, procedures and processes etc. • Take reasonable care of their own health, safety and wellbeing and that of others. • Notify line management about any hazard identified, unsafe acts or damaged/faulty equipment, this includes observations made when working in customer properties and the community • Report any accidents, incidents, occupational diseases, near misses or dangerous occurrences. • Report any medical condition that could affect others at work, or their ability to conduct their work safely. • Understand and follow specific HSE related documentation ie procedures, safe systems of work, risk assessment, method statements, training etc. • Wear appropriate PPE and use/manage in accordance with training provided. • Not to interfere with or misuse anything provided in the interests of health, safety or the environment. • Raise any matters of concern about health, safety or welfare to your immediate manager. • Promote, encourage and uphold an effective and positive culture. |
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6. OHSWE management system and operating procedures

- 6.1 The Group will adopt the structure of ISO 45001 and ISO 14001 as its preferred health, safety and environment management system, to support compliance with health, safety and environment legislation. This 'plan, do, check, act' system provides a proactive approach to workplace management and places a balanced emphasis on human behaviour, as it does on systems. The components which make up the management system (ie strategy, policy, training, documentation etc) will be made available to team members through a variety of software ie Knowledgebase, Sharepoint, Workplace.
- 6.2 All team members must observe and abide by risk specific OHSWE operating procedures and supporting documentation, which highlight the Group's arrangements for managing particular risks, and outline the responsibilities of team members in being able to manage risk effectively.

- 6.3 All managers are responsible for ensuring they and their direct reports are familiar with the contents of all relevant documentation and that specific responsibilities assigned within the procedures are implemented and communicated. These procedures include but are not limited to procedures relating to the safety of team members both within workplaces and field based, procedures relating to the safety of customers, procedures relating to property compliance and procedures relating to the safety from construction works.

7. Training and competency

- 7.1 All employees shall receive the necessary information, instruction, training and supervision to secure their health, safety and well being at work and that of others who may be affected by their actions, and the Group's operations.
- 7.2 Managers are responsible for determining the training that their team members require, and they should promptly communicate all such requirements to the People Team and HSE Manager. This is likely to include training as part of the induction process for new starters in front facing and higher risk roles.
- 7.3 The People Team and HSE Manager will be responsible for working alongside the relevant team managers for developing, monitoring and reporting progress against an annual training needs matrix. Managers should be conscious that training isn't always about classroom courses. There may be a requirement to provide on the job training, written instructions or other forms of training which managers must consider, observe and apply in their work. It is the responsibility of managers to review training requirements on the introduction of new services and work activities which may generate new or increased risk of injury and ill health. The health and safety requirements we have of our contractors shall be communicated in writing to them ahead of them starting any work in our customer's homes, in our offices or on our building sites.

8. OHSWE management scrutiny and review

The Group's OHSWE strategic plan will overview the scrutiny and communication pathways for regulatory and system compliance.

9. Legal and regulatory framework

- 9.1 The legislative provisions directly affecting this policy will be achieved through including but not limited to those relating to the health and safety of customers and others affected by the Group's activities, the Group's compliance obligations, the safety of workplace and team members, including that set out in the organisations legal registers.
- 9.2 The relevant parts of the RSH Regulatory Standards, namely the Governance & Financial Viability Standard and Consumer Standards.
- 9.3 The relevant NHF Code provisions are set out in Appendix 2 to this policy.
- 9.4 New or changes in existing legislation will be monitored by the Governance Team, HSE Manager, technical leads and team management. This also extends to approved codes of practice, guidance or instruction from enforcing authorities.

10. Equality impact assessment

- 10.1 The Group is committed to equality and diversity. This policy has considered the *Equality Act 2010* and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.
- 10.2 We will make sure that all communication related to this policy is fully accessible, and to achieve this if a policy or document needs to be available in other formats we will provide them.

11. Arrangements

- 11.1 Detailed topic specific documentation has been drawn up for the areas listed below. Statements of intent, working procedures and guidance documents are contained within each topic folder and is accessible through Viva Engage (our intranet).

While guidance notes accompanying the standard indicates a preferred course of action, if an alternative course of action is taken, it must be demonstrated that it is at least as equally as effective.

The documentation is based on activities relevant to the Group's work. The contents are not exhaustive and new topics can be added as the management system and Group operations develop. These are listed below:

- Accident/incident reporting and investigation
- Asbestos
- Confined spaces
- Consultation and representation
- Construction, design and management (CDM 2015)
- Control of substances hazardous to health
- Display screen equipment
- Electricity
- Environment and sustainability
- Fire management
- First aid
- Gas safety
- Health and wellbeing
- Lone working (including agile working)
- Water management (including Legionella)
- Lifting operations and lifting equipment
- Manual handling
- New and expectant mothers
- Noise at work
- Office safety
- Personal protective equipment (PPE)
- Risk management
- Safe use of lift trucks and mobile work equipment
- Transport management

- Sharps and needlestick management
- Vibration at work
- Violence and aggression
- Waste management
- Winter management
- Work equipment
- Working at height
- Young persons and temporary workers

12 Policy review

- 12.1 This policy will be subject to review every three years, or where there has been significant change required to update.

Appendix 1: Health, safety and environment policy statement

We believe in putting health, safety and wellbeing first, where the people and the natural environment come before anything else we do. Our work is never so urgent or important that we cannot take the time required to do it safely and with respect for the environment and each other.

In the workplace and communities we serve, we are committed to the promotion of wellbeing and the prevention of injury, ill health and pollution. Furthermore, we are also committed to seeking to reduce our carbon footprint produced by our operations alongside the sustainable use of resources.

We will:

- Promote and protect the health and safety of team members, customers, members of the public, visitors, contractors and others affected by our operations and the environments in which we work,
- Provide appropriate resources to ensure the effective implementation of this policy,
- Identify, train and use as necessary competent resources within a defined structure, and allocate health, safety and environmental responsibilities to people who have the necessary skills and competencies,
- Promote and uphold a strong health and safety culture, based on strong leadership and mutual respect for the wellbeing of others.
- Ensure a healthy, productive and engaged workforce through effective management of team member's wellbeing, including, where required, occupational health screening.
- Comply with all legal and regulatory requirements applicable to health, safety and environment.
- Identify, assess and where reasonably practicable, eliminate or control health, safety and environmental hazards, impacts and risks that arise from our activities and services,
- Actively consult with team members on matters of health, safety and wellbeing and make associated decisions having regard to the work conditions and constraints applicable to situations,
- Investigate and report on HSE incidents and share learnings on how we can prevent reoccurrence and improve our performance,
- Set health, safety and environmental targets that reflect legal requirements and are sufficient to manage risks we have identified,
- Develop an occupational health, safety, wellbeing and environmental (OHSWE) strategy plan to ensure we carry out the actions necessary to deliver targets and manage identified risks
- Monitor, review and report our performance with OHSWE and compliance with this policy.

The Group acknowledges that its core values are key to ensuring it successfully manages its health, safety and environmental risks and responsibilities, through empowering every team member to work in a way so as to protect the environment and the health, safety and welfare of themselves and those affected by our activities.

Ian Skipp

Group Finance & Resources Director

Appendix 2: NHF code relevant provisions

Customer focus: the needs and safety of the organisation's current and future customers and others relevant to the organisation's activities are placed at the heart of the Board's decision-making:

- This policy and supporting documentation has been implemented which reflects that the safety of customers, team members, visitors, contractors and members of the public is an overriding priority, and the Board regularly seeks assurance on their operation.
- The Board will use this policy to review its effectiveness towards the management and compliance of its OHSWE activities, including safeguarding.