



## **EDEN HOUSING ASSOCIATION LIMITED**

### **HEALTH & SAFETY POLICY**

<b>Document Reference Number</b>	<b>CORP09</b>
<b>Document Owner</b>	<b>Director of Finance &amp; Corporate Resources</b>
<b>Approved By</b>	<b>Board</b>
<b>Approved Date</b>	<b>22 November 2022</b>
<b>Policy Implementation Date</b>	<b>23 March 1999</b>
<b>Revision Cycle</b>	<b>1 Year</b>

This policy applies to Eden Housing Association and all its wholly owned subsidiaries

## 1. POLICY STATEMENT

Health and Safety is central to everything we do at Eden Housing Association. The Board and Leadership Team are passionate about ensuring the Health, Safety and Welfare of our people and anybody affected by our activities, this includes employee's, tenants, contractors, visitors and anyone we come into contact with whilst undertaking our work.

We are committed to complying with the Health and Safety at Work Act 1974 and all other relevant H&S legislation to ensure that we protect our people from Occupational Health and safety risks.

Our Health & Safety Policy is to:

- Prevent accidents and cases of work-related ill health
- Manage health and safety risks in our workplace
- Provide clear instructions and information, adequate training, to ensure employees are competent to do their work
- Provide personal protective equipment
- Consult with our employees on matters affecting their health and safety
- Provide and maintain safe plant and equipment
- Ensure safe handling and use of substances
- Maintain safe and healthy working conditions
- Implement emergency procedures, including evacuation in case of fire or significant incident
- Review and revise this Policy regularly

Signed:



Date:

**Geraldine Kay , Interim Chief Executive**



Signed:

Date:

**Beth Furneaux, Chair of the Board**

## **2. REFERENCES**

### **2.1 Internal**

Fire Safety Management Policy & Procedure  
Personal Safety & Lone Working Policy and Procedure  
DSE Assessments  
Accident & Incident Reporting Procedures  
Risk Assessments  
Driving at Work Policy and Procedure  
Agile Working Policy and Procedure

### **2.2 External**

The Health and Safety Executive (HSE)  
Health and Safety at Work Act 1974  
Management of Health and Safety at Work Regulations 1999  
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)  
Workplace (Health, Safety and Welfare) Regulations 1992  
First Aid at Work Regulations (1982)  
Health and Safety (Display Screen Equipment) Regulations 1992  
Manual Handling Operations Regulations 1992  
Driving at Work Regulations 1997  
Working Time Regulations 1998  
Construction (Design & Management) Regulations 2015

## **3. POLICY CONTENT**

### **3.1 The Health and Safety Executive (HSE)**

The HSE is the UK Government body responsible for enforcing health and safety at work legislation.

### **3.2 Health and Safety at Work Act 1974**

This Act of Parliament is the main piece of UK health and safety legislation. It places a duty on all employers "to ensure, so far as is reasonably practicable, the health, safety and welfare at work" of all their employees. Among other provisions, the Act also requires:

- safe operation and maintenance of the working environment, plant and systems
- maintenance of safe access and egress to the workplace
- safe use, handling and storage of dangerous substances
- adequate training of staff to ensure health and safety
- adequate welfare provisions for staff at work

Employers must also keep and revise a written record of health and safety policy and consult with employees or their representatives on such policies

### **3.3 Management of Health and Safety at Work Regulations 1999**

The Management of Health and Safety at Work Regulations 1999 places a duty on employers to assess and manage risks to their employees and others arising from work activities.

### 3.4 **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)**

These regulations require employers to report work-related deaths, major injuries, work-related diseases and dangerous occurrences.

### 3.5 **Workplace (Health, Safety and Welfare) Regulations 1992**

These regulations are concerned with the working environment. They place a duty on employers to make sure that the workplace is safe and suitable for the tasks being carried out there, and that it does not present risks to employees and others.

The regulations cover all aspects of the working environment, including:

- maintenance of the workplace, equipment, devices and systems
- ventilation
- temperature in indoor workplaces
- lighting
- cleanliness and waste materials
- room dimensions and space
- work stations and seating
- condition of floors and traffic routes
- falls or falling objects
- windows and transparent or translucent doors, gates and walls
- windows, skylights and ventilators
- ability to clean windows, etc. safely
- organisation, etc. of traffic routes
- doors and gates
- escalators and moving walkways
- sanitary conveniences
- washing facilities
- drinking water
- accommodation for clothing
- facilities for changing clothing
- facilities for rest and to eat meals

### 3.6 **Personal Safety Policy & Lone Working Procedures**

This EHA Policy underlines safety issues and contributes to the provision of a safer working environment for employees working alone. This also includes working from home arrangements and providing mental health support for lone workers.

### 3.7 **First Aid at Work**

It is EHA Policy to make provision for first aid at work and training 'First Aiders' in accordance to First Aid at Work Regulations (1982). The HR & Wellbeing Officer for ensuring regulations are implemented and identifying training needs.

### 3.8 **Fire**

The Chief Executive is responsible for ensuring that staff receive adequate fire training and that nominated fire officers are designated to all EHA premises. In addition, EHA will nominate Property Compliance and Facilities Officer and HR & Wellbeing Officer (for Blain House) who will:

Report and advise on the standard of fire safety in EHA's premises and the standard of fire training of its staff using an external consultant.  
Using the external consultant to assist in the investigation of all fires in EHA's premises and submit reports of such incidents.

### 3.9 **Display Screen Equipment**

All new computer installations must adhere to the British Standard Specifications and comply with Health and Safety (Display Screen Equipment) Regulations 1992. All new employees are expected to read H&S Executive guidance entitled 'Working with Display Screen Equipment'. All employees who regularly use VDU's will be given the opportunity to have an eye test paid for by EHA.

### 3.10 **Lifting and Handling**

Managers are responsible for informing staff of safe lifting techniques. The HR & Wellbeing Officer will ensure training in lifting and handling is provided to all staff who require it.

### 3.11 **Food Hygiene**

Managers who have responsibility for food acquisition, storage, processing and serving, staff induction and hygiene training, are responsible to the necessary legal standards. Any suspected outbreak of food poisoning or other unexplained and possibly food related incidents must be reported to the Executive Team.

### 3.12 **Control of Working Time**

EHA is committed to the principles of the Working Time Regulations. No member of staff is expected to work for more than 48 hours per week (including overtime) unless there are exceptional circumstances. Similarly, all requirements of the regulations e.g. in relation to breaks will be complied with.

### 3.13 **Construction (Design and Management) Regulations 2015**

We recognise our duty to follow the Construction (Design and Management) Regulations 2015 when taking on the role of Client, Principal Contractor, Principal Designer or contractor.

#### As the Client, we will:

- appoint a Principal Designer, where required;
- appoint a Principal Contractor, where required;
- make sure the Principal Designer and Principal Contractor carry out their duties;
- make sure there are suitable arrangements for managing a project, including the allocation of sufficient time and resources for each stage of the project;
- provide pre-construction information to designers and contractors;
- ensure notification is issued to HSE for notifiable projects;
- provide information relating to the Health and Safety File to the Principal Designer; and
- retain and provide access to the Health and Safety file.

#### As the Principal Contractor we will:

- prepare, develop and implement the construction phase plan including site rules, making sure ongoing implementation and development continues

throughout the contract; any significant changes will be brought to the attention of all parties affected; these include designers, contractors, employees and visitors;

- make sure the construction phase plan is properly planned, managed and monitored; adequate resources will be provided and site management have the appropriate skills, knowledge and experience to effectively deal with the activity and risks on site;
- make sure appropriate competencies to address health and safety issues are available to manage the construction phase;
- make sure the client is aware of their duties under CDM 2015 and comply with the requirements of Schedule 2 of the CDM regulations and part four which relate to health and safety on construction sites;
- provide contractors with relevant parts of the construction phase plan and relevant information about the project that they would require to enable them to carry out work on site safely and without risks to their health;
- ensure workers are consulted and engaged securing health and safety;
- check the competencies of all appointees;
- provide suitable welfare facilities from the start of all projects and maintain these throughout the construction phase;
- provide all workers with site induction and any further training/information needed for the work undertaken;
- consult with workers through the corporate Health and Safety Committee and other channels on health and safety matters;
- liaise with the Principal Designer (where required) regarding on going design issue;
- provide the Principal Designer with all relevant information for the health and safety file;
- make sure sites are secure;
- display the F10 notification and site rules;
- make sure all workers on site co-operate to ensure the health and safety of construction workers and others who may be affected by their work; and
- report any obvious risks.

As the Principal Designer we will:

- advise and assist the Client with their duties;
- plan, manage, monitor and co-ordinate the pre-construction phase;
- ensure the design team, where reasonably practicable, eliminate, reduce and control risks to an acceptable level;
- ensure foreseeable risks are identified;
- ensure everyone working on the pre-construction phase co-operates and effective communication is established;
- identify, collect and pass on pre-construction information;
- liaise with Principal Contractor and share information that may affect the planning, monitoring and co-ordination of the construction phase and also regarding on-going design;
- prepare the health and safety file; and
- report any obvious risks.

As contractors we will:

- plan, manage and monitor our workers;
- check competence of all their appointees and their workers;
- make sure our employees are adequately trained to carry out the work required;

- provide information to all our workers;
- comply with part 4 of the regulations;
- make sure there are adequate welfare facilities for the workers on site;
- make sure all workers have the skills, knowledge and experience to undertake the work in a safe manner;
- co-operate with Principal Contractor in planning and managing work, including reasonable directions and site rules;
- provide information needed for the health and safety file;
- inform Principal Contractor of problems with the Plan; and
- Inform Principal Contractor of reportable accidents, diseases and dangerous occurrences.

#### **4. RESPONSIBILITIES**

- 4.1 The responsibility for Health and Safety rests directly and personally with all employees from the Chief Executive to each individual. This section sets out the responsibilities under this Policy.
- 4.2 Each and every employee, regardless of the post they hold within the Association, is responsible for carrying out their work in a manner which will not put at risk their personal health and safety or that of their colleagues, or any third party.
- 4.3 Employees must plan and perform their work in accordance with the Health and Safety Policy and Health and Safety Procedures or Instructions and in compliance with current legislation. It follows, therefore, that all employees have the right and the responsibility to refuse to carry out work, or undertake any activity, which they consider to be unsafe, however this should be discussed with supervisors or line managers.
- 4.4 The Association employs the services of contractors for different specialisms within the H&S field. This is done to ensure that an appropriate 'competent person' is used.

#### **5. Board & Chief Executive**

- 5.1 The Association's Board is responsible for approving the Policy on Health and Safety and ultimately accountable in law to the H&S enforcing authorities.
- 5.2 The Chief Executive is responsible for making available the necessary resources to ensure that the health and safety standards of the Association are maintained, effective systems in place.
- 5.3 In addition, he/she is responsible for:
- Appointing an individual responsible for Health and Safety governance.
  - If unpredictable Health and Safety issues arise during the year, the Chief Executive must assess the risk, in deciding the necessary resources and actions to commit to addressing the situation.

## **6. Directors' Individual Responsibilities**

6.1 The Director of Finance and Corporate Resources is responsible for Health and Safety governance, periodically monitoring and reviewing the effectiveness of the Health and Safety Policy and budget, with the assistance of the Executive Team and others with H&S responsibilities. This will be reported into the A&R/Board at every meeting.

6.2 The Director of Finance and Corporate Resources will:

- Receive and review audit summaries as appropriate
- Collate and review statistics in relation to accidents, incidents and other key H&S areas for staff
- Ensure the Chief Executive and Board are informed of risk management issues and updates to Health & Safety Policy.
- Monitor H&S matters within the office and take corrective action in a timely manner when issues arise which impact on health, safety and welfare of staff

6.3 The Director of Operations is responsible for Health and Safety operations within the Association, periodically monitoring and reviewing the Management Systems and assists the Executive Team and others with H&S responsibilities. This will be reported into the A&R/Board at every meeting.

6.4 The Director of Operations will:

- Receive and review audit summaries as appropriate
- Collate and review statistics in relation to accidents, incidents and other key H&S areas for customers and contractors
- Ensure operational H&S issues are effectively managed and mitigated, managing the risk management to the Association
- Monitor H&S matters within the Associations Housing stock and take corrective action in a timely manner when issues arise which may impact health, safety and welfare of customers

## **7. Managers/Functional Coordinators**

- Managers/Functional Coordinators are responsible for the Health & Safety Management of their individual teams. Specifically:
- All managers / supervisors to set a personal example to employees in order to promote a positive Health & Safety Culture.



- Ensure Health & Safety responsibilities are assigned and accepted within functional responsibility areas and at all levels throughout the Association.
- Ensure Health & Safety communication is facilitated and is included as part of regular employees' meetings, when required.
- All Management and Employees receive adequate information, instruction and training to enable them to carry out their duties safely
- As far as reasonably practicable, ensure that all equipment and substances are maintained in a condition that is safe and without risk to health. Safe systems of work will be developed and maintained. Use Codes of Safe Working practice where available from authorities such as the HSE.
- Ensure that COSHH (Control of substances hazardous to health) assessments, Risk assessments and method statements are up to date and accurate. Any control measures which are introduced are complied with in order to ensure risk is controlled to a minimum level.
- Evaluate all Health and Safety hazards reported to them and take appropriate action.
- Investigate all incidents and accidents reported and take reasonable action to avoid recurrence.
- Report to the individual responsible for Health and Safety governance any member of employees failing to comply with the requirements of the Association's Health and Safety policy.

## **8. HR Officer and Property Compliance & Facilities Officer**

- The HR Officer (for Blain House) and the Property Compliance and Facilities Officer will assist the individual responsible for Health and Safety governance in the production of H&S policies and procedures and the implementation and execution of a Health & Safety management system, using external advisors as appropriate.
- They will also provide the Association and its employees with advice, support and information on matters relating to the Association's H&S policies or procedures, using external consultants where required.

## **9. Health & Safety Group Representation/Consultation**

- 9.1 The Association shall make sure, through either a dedicated Health and Safety Committee or a sub set of other groups if applicable, that employees have a method of health and safety input via group representation. This is currently through the Risk and Compliance Panel meetings.

## 10. Specific role responsibilities

- 10.1 Some specific H&S management areas are delegated to specific roles to manage, rather than being spread across the association. Below is a list of the key strategic risks and delegations:

Areas	Delegation
Asbestos Safety Management	Asset & Repairs Manager
Fire Safety Management	Property Compliance and Facilities Manager
Fire safety Management – Blain House	Property Compliance & Facilities Manager
Legionella Safety Management	Property Compliance and Facilities Manager
Gas and Fuel Safety Management	Property Compliance and Facilities Manager
Electricity Safety Management	Property Compliance and Facilities Manager
Lift Maintenance Safety Management	Property Compliance and Facilities Manager
Contractor Safety Management / CDM	Asset & Repairs Manager/ Development Officer
Lone Worker Safety Management	HR Officer

- 10.2 Below is a list of operational risks and delegations:

Task	Delegation
Display Screen Equipment	ICT Manager
Slips Trips and Falls	Supported Housing Manager
COSHH	Property Compliance and Facilities Manager
Aggressive and Violent Customers	Customer Service Manager
Food Hygiene	Supported Housing Manager
New and Expectant Mothers	HR Officer
Working at Heights	Asset & Repairs Manager
Stress	HR Officer
Manual Handling	HR Officer
Safeguarding	Housing Options Manager
Use of Work Equipment	Asset & Repairs Manager
First Aid at Work	HR & Wellbeing Officer
Driving at Work	HR & Wellbeing Officer

## **11. All Employees**

All Employees are responsible for ensuring that:

- They are aware of the Association's Health & Safety Policy, Procedures, Codes of Practice and co-operate fully with their immediate supervisor.
- They will report all accidents and incidents via the Accident and Incident Reporting email address.
- That they take responsible care for the health and safety of themselves and of other persons who may be affected by their acts or omissions
- They keep workplaces clean and tidy, and emergency routes and equipment unobstructed.
- All incidents involving or having potential to cause injury, or damage to property, or the environment, are investigated and reported and any appropriate corrective actions are undertaken.
- Complete mandatory annual online training and attend any other training that is required.
- Co-operate with the Association in relation to all health and safety matters
- Use any machinery, equipment, substance or safety devise/process provided by the employer in accordance with instructions and training
- They report any instances of unsafe working practices or any other health and safety related concerns to their line manager and the HR Department.

## **12. EQUALITY IMPACT ASSESSMENT (EIA)**

- 12.1 An EIA has been completed in order to assess whether any protected groups listed under the Equality Act 2010 has been discriminated against or disadvantaged as a result of this policy.

## **13. MONITORING & REVIEW**

- 13.1 This Policy will be formally reviewed every 12 months. The key staff identified within the policy will be responsible for monitoring performance and compliance with the policy in their areas of responsibility.
- 13.2 The Audit & Risk Committee will routinely receive a health & safety report at every meeting, which will cover incident and accident reporting as well as property compliance matters, and the Board will routinely receive reports on health & safety matters as part of the Chief Executives Report to every meeting.

## Equality Impact Assessment

Question	Response
<b>1. Name of the policy/practice/activity being assessed</b>	Health & Safety Policy (CORP09)
<b>2. Summary of aims and objectives of the policy/practice/activity</b>	Identify appropriate action when dealing with Health & Safety management.
<b>3. What involvement, consultation, engagement has taken place for the policy/practice/activity (e.g relevant groups/stakeholders)</b>	Exec team and Board
<b>4. Who is affected by the policy/practice/activity</b>	Staff, tenants and general public
<b>5. What are the arrangements for monitoring and reviewing the impact of the policy/practice/activity</b>	Annually (previously 3 years)

Protected Group	Is there a potential for a positive or negative impact	Explain and provide evidence/data used	Action to address the negative impact
<b>Disability</b>	No		
<b>Gender reassignment</b>	No		
<b>Marriage or civil partnership</b>	No		
<b>Pregnancy or maternity</b>	No		
<b>Race</b>	No		
<b>Religion or belief</b>	No		
<b>Sexual orientation</b>	No		
<b>Sex (gender)</b>	No		
<b>Age</b>	No		

## Evaluation

Question	Explanation	
Is it possible the proposed policy/practice/activity could discriminate or unfairly disadvantage people		
Decision	Tick the relevant box	Include any justification required
1. No barriers identified – <b>proceed</b>	x	
2. Barriers identified towards one (or more) protected groups – <b>stop</b>		
3. Barriers identified towards one (or more) protected groups – <b>adapt or change</b> the policy/practice/activity		
4. Barriers identified towards one (or more) protected groups – no proportionate way to amend the policy/practice/activity so <b>proceed with caution</b>		

<b>Completed by – and date</b>	Marion Mawson 12.10.2022		
<b>Reviewed by – and date</b>	Guy Johnson 12.10.22		
<b>Review Date (if applicable)</b>			
<b>Will this EIA be published?</b>	Yes		

**Action** (To be completed as required)

<b>If the Evaluation has resulted in Decision 4, complete a risk assessment and record on Operational Risk Register</b>	<b>Date Completed:</b> Already referenced on the ORR
---	---

## Change Log

Name	Date	Version	Change
	When published	1	
Marion Mawson	12.10.2022	2	Reviewed and changed dates