

Health and Safety Policy

1.0 SCOPE

Purpose

- 1.1 Everybody absolutely has the right to be able to work and live safely whilst on property owned or controlled by whg.
- 1.2 The purpose of the Policy is to set out whg's commitment to providing a healthy and safe working environment. The Policy sets out the standards required to ensure that, as far as reasonably practicable individuals have a safe place to work, receive appropriate Health and Safety (H&S) training, have safe equipment and systems of work.
- 1.3 We will deliver a culture that cares, that considers the communities we serve, enables safe working and empowers each and every person to:
 - Take ownership of their workplace.
 - Be accountable for their decisions.
 - Be responsible for their own actions and behaviour.
 - Challenge and report poor or unsafe practices and accidents.
 - Make a difference
- 1.4 The Board is committed to providing an efficient and robust H&S Management System which fulfils our legal and other obligations. This shall be continually reviewed and improved. Our Board risk appetite relating to H&S is low and to meet this we will ensure compliance with all our obligations.
- 1.5 The Policy has been written in the spirit of, and in accordance with the requirements of ISO 45001:2015.

Legal and regulatory framework

- 1.6 whg will comply with all relevant H&S legislation. A register of relevant legislation is kept and updated. All specific legislation, with a brief overview of how we ensure compliance will be set out in an Arrangements Manual. Where applicable policies and procedures shall be produced to support all of our legal obligations.
- 1.7 The Regulator of Social Housing requires registered providers to “adhere to all relevant law”. This Policy is designed to ensure that we adhere to the legislation and regulations relating to H&S. The Regulator's Consumer Standards also include requirements relating to H&S:
 - The Home Standard requires that we meet all applicable statutory requirements that provide for the H&S of occupants in their homes.

- The Neighbourhood and Community Standard requires us to keep neighbourhoods and communal areas clean and safe.

1.8 Events such as COVID-19 present new additional H&S challenges. Keeping colleagues safe and well (both physically and mentally) is a very high priority. All relevant government guidance and best practice is followed. This includes, but is not limited to, arrangements for safe working in the office, provision of appropriate PPE, support for colleagues experiencing mental health issues; and regularly reviewing and updating risk assessments.

2.0 POLICY STATEMENT

2.1 whg is committed to making a difference, in culture that cares, goes beyond compliance and takes into account our values and behaviours. The following principles shall be applied:

2.1.1 **Accidents and injuries are preventable** provided that everyone works together to manage risks, identify and prevent hazards and ensure safe working practices are devised, maintained and implemented.

whg will:

- Provide safe and healthy working conditions to prevent work related injury, ill health and time lost to accidents.
- Evaluate the compliance and competency of any external organisation interacting with our business.
- Continually review and improve the H&S Management System to ensure that it is effective in eliminating or reducing hazards and risk.
- Provide a framework for setting and reviewing occupational health, and safety objectives.
- Provide adequate support to enable all colleagues to perform robust dynamic assessments of risk during their day to day duties and for them to be able to decide and implement suitable and sufficient control measures

2.1.2 **All operating hazards can be controlled.** The business is committed to eliminating hazards. Where hazards cannot be eliminated, the following measures shall be implemented:

- Application of the hierarchy of hazard control
 - Reduce
 - Isolate
 - Control
 - Protective equipment
 - Discipline and supervision
- Provision of
 - Specialist training
 - Specialist safety devices

- Health surveillance

2.1.3 Managers will drive our safety culture and make a difference. Managers will:

- Lead by example and always do the right thing.
- Establish safety objectives.
- Demand accountability for safety performance and drive continual improvements.
- Always be sustained and consistent in their approach to H&S.
- Consider how their decisions and actions will impact on the safety culture.

Roles and responsibilities relating to H&S at all levels of the organisation, including the Board, are clear and are set out in Appendix 1.

2.1.4 Safety is a condition of employment. Individuals and interested parties associated with whg are required to:

- Take care of their own H&S and have regard to others who might be affected by their actions.
- Assess and mitigate the impacts of your work on other people, property and the environment.
- Cooperate with whg on any matters relating to H&S.
- Wear and use the correct equipment for the job, use all safety devices and conform to any safe systems of working and not intentionally misuse any equipment that is provided.
- Make necessary adjustments in line with agreed employee requirements to ensure that equipment and processes can be appropriately used.
- Proactively support the drive for continual improvement and safety excellence by:
 - Reporting accidents, incidents and near misses.
 - Identifying and reacting to hazards and potential risk.
 - Escalating any hazard that is beyond your control or capability.
 - Identifying and reporting defective equipment.
 - Respecting and taking ownership of your workplace.

2.1.5 All deficiencies must be corrected without undue delay. This is essential to:

- Reinforce an excellent safety culture.
- Support the message that safety is a priority.
- Prevent hazards escalating.
- Prevent hazards or dangerous events reoccurring.

2.1.6 Safety performance in the workplace shall be monitored. whg is committed to continual improvement of our H&S Management System. In order to do this, performance shall be monitored. This shall include:

- Proactive monitoring and auditing of the workplace and management systems.
- Identification of safety training needs and evaluation of competence.

- Setting and monitoring performance objectives.

Monitoring performance will identify any strengths, weaknesses and opportunities to improve.

2.1.7 **Competent, trained, and motivated colleagues and partners are our business's greatest resource.** In order to excel we need everyone who works for, or on behalf of, our business to:

- Be motivated and committed.
- Be knowledgeable, competent and aware.
- Be engaged.
- Be accountable and take responsibility.

Managers shall ensure that all colleagues and employees of partner organisations are competent and trained to perform their work safely. Knowledge shall be assessed and updated where necessary.

whg will provide health and wellbeing initiatives, opportunities and activities and shall proactively encourage participation.

2.1.8 **Communication is key.** whg will consult, involve, participate and communicate with all interested parties.

- A H&S portal (SHE Assure) is used to record and share details of hazards, accidents, injuries or near misses.
- A H&S Committee and other committees are established and shall meet on a regular basis, to discuss H&S objectives, legal compliance, incident analysis and trends and any other relevant topics.
- Any information, outcomes, objectives, action or training identified will be communicated as necessary to all levels of the organisation.
- Any action shall be allocated to a designated person, with an expected completion date assigned.

2.1.9 **Correlation to Corporate Values.** This Policy correlates to the Corporate Values in the following ways:

- **Accountable** for one's own actions.
- **Courageous** enough to challenge unsafe behaviours and practices.
- **Excellent** safety performance is to be encouraged and rewarded.
- **One team**, one system, in a culture of care striving to continually improve.
- **Trustworthy**, relied upon to do what is morally right, first time, every time.

2.2 H&S Arrangements

2.2.1 Technical safety guides produced by whg, trades associations and the H&S Executive link to our H&S arrangements. A range of specific policies, procedures and processes are in place to cover whg's work activities.

- 2.2.2 Training will be provided to ensure that all colleagues are competent to perform their duties, be knowledgeable of and be able to comply with any H&S legislation relative to their role.

3.0 PERFORMANCE MEASURES

- 3.1 Compliance audits at planned intervals shall provide information on whether H&S systems conform to the requirements of relevant H&S legislation. This shall include the performance of contractors.
- 3.2 Statistical and analysis is carried out on reported accidents and near misses.

4.0 TRAINING AND DISSEMINATION

- 4.1 We will communicate the Policy to colleagues, contractors and the supply chain to enable them to gain a better understanding of how our actions, activities, products and services potentially impact on people, property and the environment.
- 4.2 We are committed to investing in a programme of ongoing awareness, training and engagement activities to embed a culture that cares.

5.0 MONITOR AND REVIEW

- 5.1 This Policy will be monitored by the Corporate Director of Governance and Compliance and reviewed annually by the Policy Group and whg Board.

6.0 ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES

- 6.1 Documents, policies and procedures associated with this Policy are:
- The H&S Management System.
 - All applicable primary and secondary H&S legislation.
 - The H&S Arrangements Manual.
 - Policies and procedures relating to specific areas of H&S.
 - whg's Business Continuity Strategy.
 - whg's People Strategy.
 - Corporate Plan 2020-24.
 - ISO 45001: 2015.

APPENDIX 1

Roles and Responsibilities

1.1 This section identifies the defined roles and responsibilities in respect of H&S. While it reflects the senior management structure at the time of publication, it is recognised that structures and reporting lines may change. Specific responsibility at Director level will always lie with the person(s) who has the H&S Team within their Directorate.

1.2 All whg Colleagues

All whg colleagues are personally responsible for:

- Taking reasonable care at all times regarding themselves and other persons who may be affected by their actions.
- Wearing and using all personal protective equipment, using all safety devices and conforming to any safe systems of work that are provided by management for their protection.
- Co-operating fully with whg managers when they are pursuing their H&S responsibilities and supporting a proactive culture towards H&S.
- Reporting all accidents, incidents and near misses to their manager or local H&S Representative.
- Reporting any work situation which might present a serious and/or imminent danger and any perceived shortcomings in the H&S arrangements.

1.3 Managers

In addition, Managers are responsible for:

- Maintaining effective H&S in their work areas.
- Ensuring all colleagues for whom they are responsible are properly informed of their personal responsibilities in regard to H&S and that adequate resources are made available to enable them to satisfy those responsibilities.
- Ensuring all incidents, near misses or concerns are notified immediately to the Health and Safety and Environmental Manager or the Corporate Director of Governance and Compliance.

- Providing representation on the H&S Committee, as required and supporting a proactive culture towards H&S.

1.4 **The Health, Safety and Environmental Manager**

The Health and Safety and Environment Manager will:

- Advise on strategic and organisational H&S matters, and ensure that there is a framework for the promotion of best H&S practices, including performance monitoring and review.
- Attend H&S Committee meetings, to provide specialist advice and support and chair the Committee in the absence of the Corporate Director of Governance and Compliance.
- Provide expert advice on H&S to the Corporate Director of Governance and Compliance.
- Write whg H&S procedures in line with this Policy.
- Prepare H&S reports for the H&S Committee, including accident and incident statistics.
- Ensure appropriate documentation and relevant publications and manuals are readily available for Board Members, Committee Members and colleagues.
- Ensure there is a structure for the integration of whg H&S objectives into business plans and management performance criteria, in order to ensure that H&S is an integral part of whg culture.
- Monitor the work of the Occupational Health Advisory Service in relation to health surveillance.
- Advise on the application of the Equality Act 2010 in relation to H&S matters.
- Assist Managers in the preparation and review of risk assessments including those for general risks, COSHH, manual handling, personal protective equipment, and display screen equipment in line with appropriate whg policies.
- Provide Managers and local H&S representatives, with technical and legal advice on relevant H&S issues.

- Advise the Corporate Director of Governance and Compliance on H&S training needs and priorities and monitor the effectiveness of that training.
- Provide H&S training as appropriate, including training to Trade Union representatives as required.
- Keep the Corporate Director of Governance and Compliance advised of relevant potential and actual legislative changes with regard to H&S.
- Co-ordinate whg activities in relation to COSHH and manual handling compliance.
- Prepare H&S targets and monitor performance against them.
- Report incidents and accidents in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995.
- Oversee a programme of H&S audits against key risks.
- Provide the Group Executive and whg Board with an annual briefing on H&S matters.

1.5 Head of Human Resources

Is responsible for:

- Appointing and overseeing the activities of an appropriately qualified Occupational Health Advisory Service to provide Occupational Health Services to whg colleagues.

1.6 Directors

Directors are responsible for:

- Ensuring that H&S is given a high priority within their areas of operation.
- Liaising with the Health and Safety and Environment Manager concerning the preparation of an annual H&S and Training Plan.
- Receiving, reviewing and prioritising H&S proposals from the Health and Safety and Environment Manager, managers, or H&S representatives.
- Supporting representation on the H&S Committee and supporting a proactive culture towards H&S.

- Considering the H&S implications of any new initiatives or changes to activities within their operational areas.
- Reporting to GEXEC identified risks that may impact on their delivery of service.
- Liaising with the Health and Safety and Environment Manager to ensure that new or emerging operational risks are controlled or mitigated through a documented action plan.
- Identifying where operational risks have the potential to become strategic risks, and reporting them to the Corporate Risk Panel for potential inclusion in the Corporate Risk Register.

1.7 Corporate Director of Governance and Compliance

The Corporate Director of Governance and Compliance has delegated responsibility for:

- Ensuring that H&S is considered as an integral part of whg's approach to Corporate Risk.
- Presenting the annual H&S report to the whg Board or its delegated committee.
- Keeping the whg Board informed of H&S legislative developments and other key H&S issues and their potential impact on whg business.
- Chairing the H&S Committee and, where appropriate, taking H&S information, recommendations, proposed policies and requests for resources to the whg Board for approval as identified and recommended by the Committee.
- Appointing and supervising the activities of an appropriately qualified and experienced Health and Safety and Environment Manager, in accordance with the requirement for a Competent Person under Regulation 7 of The Management of Health and Safety at Work Regulations 1999.
- Chairing investigations into serious accidents and ensure relevant documentation and information has been utilised to reach a conclusion that is transparent and concise to support changes in practice.

1.8 Group Chief Executive

The Group Chief Executive accepts responsibility for all aspects of H&S on behalf of the whg Board and is accountable to them for implementing all H&S policies. In particular the Group Chief Executive has responsibility for:

- Leading the development and execution of whg's plans.
- Acting as a direct liaison between the Board and management.
- Reviewing and overseeing the implementation of whg plans.
- Ensuring there is an appropriate structure for the monitoring and review of H&S performance, in line with whg policy and H&S legislation.
- The allocation of sufficient resource to enable the implementation of H&S policy and ensure statutory compliance.
- Providing clear and visible H&S leadership that encourages colleague involvement in improving H&S standards.
- Ensuring that all decisions made reflect the H&S intentions of whg.
- Requiring Directors to report on potential strategic risks along with proposed actions to control.

1.8 **Board H&S Champion**

The H&S Champion will be nominated by the whg Board and will be a member of the H&S Committee. They will ensure that H&S implications are considered as appropriate during decision making.

1.9 **whg Board**

As whg's governing body, the Board carries ultimate responsibility for the H&S of colleagues, customers and other persons whilst on whg owned premises, or who might be affected by the organisation's acts or omissions. In particular the Board is responsible for:

- Satisfying itself that whg has an appropriate written statement of policy on H&S and effective arrangements for the implementation of that policy.
- Ensuring that adequate resources for H&S are provided.
- Receiving regular reports on H&S from the H&S Committee which include a summary of annual H&S performance.

- Reviewing any untoward incidents carrying a major risk to H&S.
- Reviewing any enforcement action taken against whg by the enforcing authorities.
- Demonstrating leadership and commitment to the principles of effective H&S management from the top.
- Establishing and supporting effective downwards communication systems and management structures.
- Approving plans and ensuring the implementation of the H&S Policy and embedding a proactive culture within whg.
- Appointing a dedicated Board H&S Champion.

1.10 **H&S Committee**

The H&S Committee provides a forum for colleague consultation on H&S associated matters that are referred to it by Trade Union H&S Representatives or Managers.

Minutes will be reported to the Group Executive for review.

The role of Trade Unions in appointing H&S representatives and representing their members' interests is acknowledged and supported.

1.11 **H&S Representatives**

H&S Representatives are responsible for:

- Attending H&S Committee meetings and reporting back to their members on issues relating to H&S.
- Assisting accident investigations as required.
- Ensuring all incidents, near misses or concerns are notified immediately to the Health and Safety and Environmental Manager or the Corporate Director of Governance and Compliance.
- Supporting a proactive culture towards H&S.