

# Health and Safety Policy

## 1. SCOPE

### Purpose

**1.1.** The purpose of this policy is to provide a comprehensive summary of the health and safety responsibilities and arrangements in place across whg. The detailed risk assessments and requirements of various activities are held within separate policy and procedural documents.

This policy aims to demonstrate how a just and fair approach to health and safety ensures that all colleagues and other stakeholders with whom whg works, understand their roles and responsibilities at all levels across the organisation.

### Legal and regulatory framework

**1.2** This policy encompasses the following legal or regulatory compliance:

- Health & Safety at Work Act 1974.
- Workplace (Health, Safety and Welfare) Regulations 1995.
- Management of Health and Safety at Work Regulations 1999.

Compliance with more specific health and safety legislation is detailed in the relevant subject specific health and safety policies that are mapped in the overarching Health & Safety Legislation Matrix.

## 2. GROUP CHIEF EXECUTIVE'S POLICY STATEMENT OF INTENT

**2.1** whg is committed to providing and maintaining a healthy and safe working environment that promotes wellbeing for all its colleagues and any other people who may be affected by its activities. The ultimate responsibility for ensuring the implementation of this policy lies with the Board, Chief Executive and the Corporate Directors.

The Directors and Heads of Service are responsible for ensuring compliance with whg's Health and Safety Policy within their areas of control. They have a key role in encouraging a positive attitude to health and safety through appropriate management arrangements. Other colleagues with supervisory or managerial responsibility are accountable to their director or Head of Service for managing risks to health and safety under their control.

All colleagues have a responsibility to promote a healthy and safe working environment to safeguard their own health and safety and that of their colleagues and are required to abide by rules and requirements made under the authority of this policy. Failure to do so will result in disciplinary action.

This statement and supporting policies have the following objectives:

- to ensure whg complies with the requirements of relevant legislation and current best practice
- to identify significant hazards (the potential for harm), assess risks (the likelihood of that harm being realised) from activities involving those hazards and manage those risks
- to promote a positive attitude to health, safety, and wellbeing amongst all whg colleagues
- to ensure that colleagues, customers, contractors and others are adequately informed of the relevant identified risks
- to ensure that colleagues, contractors and others receive appropriate instruction, training, and supervision
- to ensure that colleagues are competent to deal with the risks they encounter
- to ensure that the demands of activities do not exceed the capabilities of colleagues to carry out the work safely
- to consult with colleagues, customers, contractors and with colleagues' representatives on health and safety matters as appropriate
- ensure that this documentation and supporting information is made accessible to colleagues through a range of channels
- to make arrangements for coordination and cooperation with other employers where:
  - whg's colleagues share premises, facilities or activities with persons working in other organisations
  - persons from other organisations, including contractors, are working in whg-controlled activities/areas
- to actively monitor and review the effectiveness of health and safety risk management and where appropriate to implement improvements

whg will provide adequate training, information, and supervision to colleagues in accordance with the general duties on employers under Section 2 of the Health and Safety at Work etc. Act 1974 and associated regulations. All colleagues including any temporary and casual workers will be provided with information on any risks relevant to their particular activity and work area.

All information, instruction and training given to colleagues, temporary and casual workers will be recorded on individual training records. In certain instances, colleagues will be asked to sign to confirm receipt or understanding of the training

This policy statement is communicated via digital and/or paper format to all colleagues and persons working for or on behalf of whg and will be made available to stakeholders, contractors, customers and any other interested parties on request.

### **3. RESPONSIBILITIES FOR HEALTH AND SAFETY**

#### **3.1 Overall Responsibility**

Overall and final responsibility for health and safety is that of the whg Board, The Group Chief Executive and the Executive Team.

The Chief Executive has overall responsibility for the health and safety of colleagues, and all other persons who may be affected by the Group's activities.

Responsibilities include:

- Ensuring whg has access to competent Health and Safety advice as required by the Management of Health and Safety at Work Regulations 1999.
- Ensuring that there exists an effective policy for Health and Safety management, supplemented by additional documents as necessary, and that these documents are implemented throughout whg.
- Budget for adequate resources to fully implement the health and safety policy.
- Ensuring this policy is reviewed on an annual basis to ensure the arrangements for health and safety remain current and valid.
- Ensuring that necessary resources and information is made available for the policy to be effectively put into practice.
- Ensuring that Health and Safety training is provided to all new colleagues as part of whg's overall training programme.
- Ensuring that arrangements are in place for all colleagues, including contractors, carry out their respective duties regarding health and safety within their areas of control; and,
- Co-operating and assisting, as necessary, with all enforcing authorities and any other external body concerned with Health and Safety in the course of their duties.

### **3.2 Day-to-day responsibilities**

Day-to-day responsibility for ensuring this policy is put into practice is managed by categorising health and safety in terms of corporate H&S, Landlord H&S and Contract Management H&S as follows.

### **3.3 Corporate Health and Safety**

**Scope:** Governance and all of whg's people – Board members, Executive Directors, all colleagues, customers and visitors that may have contact with whg's activities.

**Lead Directorate: Governance, Compliance and Communications** – leading on corporate oversight and people safety and compliance through:

- occupational health, oversight of RIDDOR notifications and HSE responses, relevant personal risk assessments, accident monitoring and ensuring every site has an appropriate number of fire marshals and first aiders, H&S monitoring, compliance audits, co-ordination of the risk assessment framework, training delivery, and advice & guidance.
- Supporting the Learning and Development teams with induction training, management & oversight of any mandatory H&S training requirements

**Role: Head of Health Safety and Environment**

- Day to day operational responsibility for health and safety (excluding building/customer compliance see 3.4)
- Providing training, advice and guidance
- Overseeing good governance, 2nd line audit & assurance checks and reporting, performance reporting, co-ordinating H&S activities
- Leading on colleague H&S policy, procedures and risk assessments including this Group Corporate Health & Safety Policy
- Risk Assessment Framework – design and oversight of the framework which includes generic and service specific assessments
- Completion of the corporate risk assessments
- Management of the H&S training matrix, direct delivery of some training and commissioning of other external training.
- Management of the accident reporting system

### **3.4 Assets Health and Safety**

**Scope:** All of whg's property assets - owned or managed rented residential buildings (dwellings and communal areas), all whg workplaces

**Lead Directorate: Strategy, Assets and Transformation**

**Roles:**

- Corporate Director of Strategy, Assets and Transformation
- Director of Assets - Building Safety
- Director of Assets - Home Maintenance Service
- Director of Assets – Investment
- Corporate Director of People and Culture
- Facilities Manager

Landlord/property H&S compliance:

- 1st line assurance checks
- Performance & compliance reporting
- Leading on asset H&S policies, procedures and risk assessments (including gas safety, electrical safety, legionella, asbestos, fire risk, lifting equipment, PUWER)
- Maintaining data systems and data accuracy
- Contractor procurement and management, including CDM compliance
- Asset management strategies and planning
- Repairs and maintenance of properties
- Workplaces including offices and other facilities, ensuring all legal requirements are in place and maintaining safe working environments

### **3.5 Contract Management Health and Safety**

**Scope:** Any contract that involves a contractor working on any of sites/assets.

**Lead Directorate: All directorates/teams as appropriate.**

**Role:** Managers/Team Leaders – first line assurance checks/ensuring that contractors are H&S competent as appropriate and work safely on site, ensuring appropriate contractor procurement/CDM compliance.

### 3.6 Directors and Leadership Team

Each Director/Leader is responsible for the sound and effective day-to-day management of the health and safety arrangements within their area of responsibility.

To satisfy their duties they will:

- Undertake any training or development required by whg in relation to health and safety
- Ensure that the duties and responsibilities for safe working are properly assigned, accepted and understood by all personnel (colleagues or contractors) working in or around whg's property.
- Ensure that the health, safety and welfare arrangements provided are maintained and available at all times.
- Ensuring team meeting agendas cover health and safety to ensure the opportunity for issues to be raised and where reports regarding the overall safety performance of whg and any necessary recommendations can be considered, as appropriate.
- Take responsibility, as far as is reasonably practicable, for implementing any recommendations arising from any risk assessment carried out within their area of responsibility.
- Ensure that all accidents and near misses are reported, including RIDDOR notifications, and investigated to determine if further controls are necessary to prevent a recurrence.
- Ensure that all colleagues have been briefed on and understand any safe working systems/procedures relevant to their work.
- Ensure colleagues have access to all necessary and relevant information appertaining to their health, safety and well-being at work.
- Carry out routine inspections and monitor the activities within their area of responsibility, to ensure all equipment, the working environment, local fire precautions and welfare arrangements satisfy the appropriate standards.

### 3.8 Colleagues

All colleagues have a statutory duty to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions. In order to comply with this duty all colleagues will be expected to:

- Take reasonable care of their own health and safety.
- Conform to any legal requirements, whg rules, procedures and instructions necessary for ensuring health and safety.
- Undertake any training or development required by whg in relation to health and safety
- Seek advice and instruction when situations arise, which may affect the health and safety of themselves or others.

- Report any unsafe equipment, methods of work or any other safety concerns to an appropriate person.
- Stop work and seeking advice if they believe there is an imminent risk of injury to themselves or others.
- Report any near miss or accident, however slight, and whether or not injury or damage has been sustained.
- Comply with procedures laid down for reporting and investigating accidents, taking prompt action to prevent re-occurrence whenever possible.
- Co-operate with Team Leaders and managers on health and safety matters.
- Assist at all times in maintaining good housekeeping standards; and,
- Not interfere with anything provided to safeguard health and safety, e.g. remove or wilfully discharge fire extinguishers, adjustment of machinery outside permitted safety guidelines etc.

Colleagues are reminded that non-compliance with health and safety rules and procedures will result in disciplinary action and may include dismissal, if appropriate.

## 4. ARRANGEMENTS FOR HEALTH & SAFETY

### 4.1 RISK ASSESSMENT & CONTROL

#### 4.1.1 Risk Assessment

Safe working can only take place if all of the hazards that exist in a work task are identified, evaluated and controlled. **All work tasks are to undergo an appropriate level of risk assessment prior to the task commencing.** Risk assessment is a fundamental management tool to the successful pre-planning and execution of all work activities. Once the risk has been quantified it is possible to then determine what actions are necessary to either remove or reduce the risk.

Risk assessment is the manager's responsibility and whoever carries out risk assessment for a task must have a clear understanding of the principles of risk assessment and an adequate knowledge of the task to be undertaken.

The significant risks shall be identified and recorded on the appropriate risk assessment form; the risks and the appropriate control measures shall be communicated to the colleagues who are to carry out the task. Where colleagues change part way through a task, it is a management responsibility to ensure that the risk assessment is appropriately communicated to the replacement colleague(s).

Risk assessments are to be reviewed when changes to the task or work environment may affect the risk colleagues and others are exposed to. As a minimum, risk assessments will be reviewed annually.

#### 4.1.2 Risk Control, Reduction and Removal

Risk control is the process of designing, implementing and maintaining measures that will reduce a particular risk. The primary purpose of risk assessment is to identify the

measures necessary to either remove the risk completely or put in place control measures to minimise the risk as far as reasonably possible.

Control measures are to be based upon the hierarchy of control shown below:

1. Eliminate the hazard
2. Substitute the hazard at source
3. Isolate the hazard
4. Reduce the risk from the hazard
5. Safe Systems.
6. Personal protective equipment (PPE).

In some cases it may be appropriate to transfer the risk to external contractors/suppliers.

#### **4.1.3 Method Statements**

Certain work tasks can be complex, or the risks associated with the tasks so significant that detailed instructions are required to ensure the risks are effectively managed. Where this becomes apparent, a detailed method statement is to be prepared and communicated to the relevant colleagues to identify the various procedures necessary to manage and control the risks. Additionally, it should be ensured that colleagues drafting method statements have the technical and health and safety competence to do so.

A procedure will be in place that will cover:

1. Identifying the significant hazards involved in our activity.
2. Deciding who might be harmed and how.
3. Evaluating the level of risk and decide if existing precautions are sufficient, or if more needs to be done.
4. Recording the significant findings of the assessment.
5. Reviewing the assessment when things change, or there is reason to believe that it is no longer valid.

The Head of Health & Safety will check that risk assessments are undertaken by the appropriate colleagues and that these colleagues are appropriately trained.

### **4.2 TRAINING, INFORMATION & SUPERVISION**

#### **4.2.1 Training**

Induction training, followed by specific training in the hazards present in the workplace and the reduction of the associated risks is critical to successful health and safety management. All colleagues receive relevant and timely training, appropriate to the requirements of the job, to ensure they are competent to carry out their role safely. The type and nature of the training will depend upon the colleague's knowledge, experience and any previous training they may have had.

All training is provided by competent trainers and at the end of each training session the training is evaluated by the trainees for its value and effectiveness.

Records of all health and safety training received by a colleague are to be recorded within their personnel file held by H.R. Mandatory legal training records will be maintained in Centrik. Managers are responsible for periodically reviewing the training needs of colleagues for whom they are responsible and ensuring appropriate refresher training is provided. The Learning and Development team will support managers to arrange role specific training.

Job specific training will be identified and monitored by the relevant Manager.

#### **4.2.2 Health and Safety statutory information**

The Health and Safety Law Poster and a copy of the Employer's Liability Insurance certificate must be displayed in a clearly visible area within the premises.

#### **4.2.3 Supervision**

The supervision of new colleagues/trainees will be arranged by the relevant Manager supported by the People Services team.

#### **4.2.3 Young Persons**

**(a)**

Young persons under the age of 18 years are considered to be particularly at risk from the hazards that are presented in the workplace because of their perceived lack of awareness, inexperience and immaturity (both physical and mental). Consequently, whg will ensure that a specific risk assessment is conducted for all young persons prior to commencement of employment to ensure that all necessary measures are put in place to safeguard their health, safety and well-being beforehand. This will be done by the service manager supported by the Health, Safety and Environment and the Colleague Engagement and Wellbeing Team (if required).

It is whg's policy that children under the age of 16 will not be employed. The one exception is where an individual is on a recognised and approved work experience scheme, in which case a young person's risk assessment is to be carried out by the service manager supported by the Health, Safety and Environment and the Colleague Engagement and Wellbeing Team (if required). The results of the risk assessment are to be communicated to the child's parents/guardians as well as the child and education establishment.

The Director of People is responsible for ensuring that all young persons are assessed prior to the commencement of work by the line manager or Head of Service. The assessment is to take into consideration the full nature of the work and the specific hazards present in order to determine if the current controls and precautions are sufficient or whether additional controls are necessary.

#### **4.2.3 New and Expectant Mothers**

**(b)**

whg has specific obligations towards its colleagues who become pregnant or who have recently given birth. In accordance with Regulation 16 of the Management of Health and Safety at Work Regulations 1999, whg, on notification, will assess the individual and their workplace to ensure they, (and the unborn child) are not exposed to undue risk.

Occasionally, the work a colleague undertakes can be potentially damaging to the health of a pregnant worker or their unborn child. Additionally, there is also a potential risk to the new child and a nursing mother from certain hazards in the workplace. Colleagues have a responsibility to notify us when they become aware that they are pregnant. Once the business has been notified, the Health, Safety and Environment team are responsible for carrying out an additional risk assessment to evaluate the level of risk to a pregnant colleague or nursing mother.

Colleagues becoming pregnant or having recently given birth are to notify their line manager so that an assessment can be carried out and appropriate arrangements made and notified to HR.

The assessment is to be reviewed at regular periods with the individual to ensure any necessary adjustments to the work or workplace can be identified and taken. In some cases, special provisions, such as altering the individual's conditions or hours of work if it is reasonably practical to do so will be taken. Alternatively, dependant on the circumstances at the time, whg may agree to excuse the individual from further work, on full pay, in accordance with the Employment Rights Act.

In order to protect the unborn child, if whg becomes aware of any case of Rubella (German Measles) among colleagues the expectant mother will be informed immediately and given the opportunity to work from home where the job role enables this or to be temporarily excused from attending work (on full pay) in order to minimise the risk of exposure.

#### **4.3 HEALTH & SAFETY ADVICE**

In accordance with the Management of Health and Safety at Work Regulations 1999, whg will ensure it has access to competent Health & Safety advice.

#### **4.4 MONITORING HEALTH & SAFETY PERFORMANCE**

In addition to the reactive monitoring of accidents/ill-health, whg will also carry out proactive monitoring of health and safety performance. Specific responsibilities are detailed in Section 3 above. In addition, the Health & Safety Committee, chaired by the Corporate Director of Governance, Compliance and Communications, will maintain oversight of operational activity and reports will be provided to the whg Board quarterly.

KPIs will be set and measured and reported through whg's governance structure.

To check working conditions, and ensure safe working practices are being followed, the H&S team will conduct routine audits of workplaces and working practices and review the effectiveness of risk assessments and work practices.

These checks will follow the HSE's 'Plan, Do, Check, Act' approach to managing health and safety and any learning from these will be considered and where appropriate, factored into working processes and/or policies.

The GEXEC Team will receive monthly updates on health and safety performance which will also be shared with senior managers, as well as live performance reporting via the Business Intelligence Framework.

## 4.5 OCCUPATIONAL HEALTH

### 4.5.1 New Colleagues

In liaison with HR, managers are to ensure that the individual concerned is fit for employment and that the work they will be involved in will not present a threat to their health and safety. Where appropriate, pre-start checks may be required.

### 4.5.2 Sickness Absence

Where a colleague is either absent through long-term illness, or suffers from recurrent short-term sickness absence, the procedures in the Sickness Absence Policy are to be followed, including wellbeing support as required.

### 4.5.3 Management of Injuries

Where a colleague has been injured through their work, an early occupational health intervention can increase the possibility of an early return to work alongside support and wellbeing advice as required. See also whg's Sickness Absence Policy.

### 4.5.4 Work Related Stress

Systems of work that give rise to risk of stress are clearly not safe, and whg, therefore, has a legal duty to make improvements, at least "as far as is reasonably practicable" to eliminate or adequately control the risk.

whg is committed to protecting the health, safety and welfare of all our colleagues and recognises that workplace stress is a health and safety issue and acknowledges the importance of identifying and reducing workplace stressors.

To achieve this, whg will:

- Ensure jobs are 'do-able', matching the job with the person in it.
- Strive to identify all workplace stressors and control the risks from stress.
- Monitor stress levels through a combination of sickness absence monitoring and 1:1 discussions with line manager support.

Colleagues requiring advice or who have concerns that they are affected by stress can seek advice from the Head of Wellbeing and Inclusion who will, if necessary, arrange specialist advice and assistance to determine the appropriate course of action to eliminate or control the risk factors

### 4.5.5 Health Surveillance

Some of whg's work involves operations where colleagues are subject to noise, vibration and dust and other hazards. Where these hazards cannot be avoided after reviewing the hierarchy of control at Section 4.11 personal protective equipment (PPE) must be used on these occasions. Colleagues involved in operations which are subject to noise, vibration, dust and other hazards, are required to monitor any effects on their well-being on a weekly

basis and report these to their line manager, so that any possible problems can be picked up early. On-going monitoring of health surveillance will be carried out by the Health, Safety and Environment team.

Where a manager or colleague suspects a problem then medical advice will be sought and acted upon accordingly.

The need for health surveillance should generally be determined from the activities carried out. Additionally, conditions identified on the health declaration may also prompt the need for health surveillance.

Details of specific surveillance requirements are as follows:

### **Noise**

Exposure to high noise levels has the potential to damage the hearing of those exposed. The extent of the damage is related to the noise level and the exposure time. There are occasions when the noise is instantly damaging.

As with all other workplace hazards, it is necessary to carry out a risk assessment for all colleagues exposed to high noise levels. When carrying out any assessment, always remember to consider client's and other contractor's noise sources.

Wherever possible noise exposure is to be controlled at source, through the design of the workplace or limiting duration of exposure. Only when these methods are not possible should PPE be used.

Managers will ensure the provision of information, instruction and training so that work equipment and control measures are used properly.

### **Vibration**

Some items of equipment are used in whg's operations that may potentially expose users to hazardous levels of vibration. This may lead to a variety of health effects depending on the nature and source of the vibration.

Many of the vibration sources are items of hand-held equipment that may lead to damage of the hands and arms.

Equipment should be sourced which minimises vibration. Where vibration cannot be avoided then exposure times should be strictly adhered to.

### **Respiratory**

whg may use products or have premises that contain products that could potentially cause damage to lungs and/or cause respiratory problems.

Risk assessments must be carried out in every case ensuring all relevant Coshh data is considered. Risks to the immediate operative along with others in the area should be assessed.

Where possible dusts/chemicals should be controlled at source or designed out. PPE should be used when necessary, if the hazard cannot be avoided.

#### **4.6 FIRST AID**

The Head of HSE will ensure that there are sufficient numbers of adequately first aid trained colleagues and that appropriate equipment is provided.

The Head of HSE is responsible for ensuring the location of the first aid kit, and the names of First Aiders and/or nominated persons are known to all colleagues.

First Aiders are not permitted to dispense drugs or antiseptics, e.g. aspirin, anadin, paracetamol tablets or antiseptic creams and ointments e.g. TCP, Savlon etc. First aid boxes should be kept open at all times. Monthly checks on provisions are to be made by the Health, Safety and Environment team and any shortfalls addressed

An accident reporting system is in place and **must** be used if a colleague has an accident or near-miss, however minor, in the work place. See section 8 below.

#### **4.7 EVACUATION**

whg takes its responsibility for the welfare of its colleagues and customers very seriously and will reduce and control risks wherever possible to minimise the risk of fire and to allow for early detection in the event of fire. Detail of this is in the separate Fire Safety Policy. As part of general health and safety all colleagues will pay attention to identifying potential fire risks and take appropriate action to eliminate the risk.

Colleagues will be identified and provided with relevant training to take the position of Fire Marshalls. The Fire Marshalls will take responsibility to ensure that colleagues are aware of the fire procedure and regular fire drills are carried out to test the effectiveness of that procedure.

The Head of Building Safety will ensure the fire brigade is aware of the site layout, fire procedures in each location, alarm systems and contact details and maintaining good working relationships at all times.

#### **4.8 INVACUATION**

Should the need or situation require the offices to be locked down whg has invested in creating an invacuation policy. The primary aim of this policy is to ensure the safety and security of colleagues and visitors at whg office locations at times of crisis or civil unrest.

The activation of the plan can be triggered by internal colleagues or via communications from external bodies, the resultant will be a lock down of the associated facility and all colleagues being moved around the building to a location that has been deemed safe, the facility will remain "locked down" until such a time that it is safe for colleagues and visitors to be allowed out.

There will be a series of internal and external communications during any such event to ensure the safety of any remote colleagues and visitors and to deter them from coming to the facility.

#### **4.9 PLANT, MACHINERY AND WORK EQUIPMENT**

whg will ensure that all plant and equipment is suitable and in accordance with legislation such as the Provision and Use of Work Equipment Regulations 1998, the Lifting Operations and Lifting Equipment Regulations 1998 and the Electricity at Work Regulations 1989.

All colleagues are required to carry out a visual check of any equipment before it is used. In some cases, this check will need to be documented. whg will advise when this is the case.

#### **4.10 MANUAL HANDLING**

whg will eliminate the need for manual handling wherever possible. Where elimination is not possible, the risks from manual handling will be assessed and reduced, so far as is reasonably practicable by job design, dynamic risk assessments and the provision of mechanical aids etc.

Where there is a significant risk involved in a manual handling task, a specific manual handling risk assessment will be carried out by the manager and appropriate control measures put in place to ensure safety.

#### **4.11 PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Wherever possible, risks will be controlled by means other than PPE. However, it is recognised that PPE is sometimes the only practical control measure, and at other times it is required in addition to other control measures; its use is to be justified on the risk assessment.

Managers will be responsible for ordering PPE for new starters and providing this to them as part of their induction.

Heads of Service will be responsible to ensure colleagues wear appropriate PPE provided. managers will ensure new starters receive the appropriate PPE.

All colleagues have a responsibility to report any defects or problems regarding their PPE to their line manager.

Prior to using PPE, all colleagues are to be provided with information, instruction and training in its use.

Records of the issue of any item of PPE to a colleague will be kept which will include the type of PPE supplied, the date of issue, frequency of maintenance required, training provided, and hazards protected against.

#### **4.12 DISPLAY SCREEN EQUIPMENT (COMPUTER USERS)**

whg will assess and control health risks from exposure to display screen equipment in accordance with the Health and Safety (Display Screen Equipment) Regulations 1992. All colleagues can access free eye tests via whg's healthcare scheme. whg will cover the cost of correction appliances where these are needed specifically for work with display screen equipment.

Display Screen Equipment workstation assessments will be carried out by suitably trained staff. Approval for corrective action to remove or control risks will be the responsibility of the Head of HSE who will access specialist external advice where necessary.

Where assessments show that display screen equipment is in use, the company will meet the requirements of the Health and Safety (Display Screen Equipment) Regulations. Workstations will be assessed for suitability and where necessary, users of display screens will be trained in the most appropriate working practices and required to undertake eyesight tests.

Colleagues who have declared a disability or existing upper limb disorder to the Head of HSE will be individually assessed to ensure all necessary adjustments are made to their workstation and job tasks to allow them to continue working.

#### **4.13 WORKPLACE FACILITIES MANAGEMENT**

Poor facilities management is a common cause of accidents and fire related incidents. The three basic precautions for the prevention of poor housekeeping are: -

- Return equipment and materials to their designated locations.
- Remove waste daily.
- Report problems.

Workplace inspections will be carried out at locations where whg colleagues are based to identify where standards require improvements at each location on a regular basis by the Facilities Manager supported by colleagues who lead on facilities management at workplaces other than Hatherton Street. This person will ensure any issues identified are reported appropriately for remedial action and will monitor that this is done. Storage areas will be defined within the workplace and requirements will be reviewed periodically when necessary. Articles and substances will be stored in defined areas at all times.

whg is committed to providing suitable and sufficient welfare facilities to colleagues, in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992.

Adequate numbers of clean toilets are provided for the number of colleagues and visitors required to use them. Toilet paper, hot/cold water, soap and means for drying hands will always be available. In addition, drinking water and a means to prepare hot drinks and food is provided at all staffed premises.

To ensure that a high standard of cleanliness and good hygiene is maintained, all facilities are cleaned daily. Any colleague who has concerns with the standard of cleanliness and hygiene should report the matter to the person who has the role of facilities management at their office who will then investigate and respond accordingly.

Floors will be cleaned on a regular basis and waste bins emptied daily. Waste will be kept in suitable containers and will not be allowed to overflow. Combustible waste will be kept away from ignition sources.

#### **4.14 CONTRACT PROCUREMENT**

As part of whg's contract procurement processes, account of relevant health and safety requirements must be considered. Where appropriate and relevant, contractors may be required to have registered with an SSiP scheme.

#### **5. CONSULTATION WITH COLLEAGUES**

whg will consult with its colleagues in accordance with the Health and Safety (Consultation with Colleagues) Regulations 1996. Consultation with colleagues will be provided via the Joint Negotiating Committee (JNC) with Trades Unions, the Colleague Connect network, and the H&S committee attended by the trade union representatives.

The Executive Team, Directors and Leadership Team are to ensure that all colleagues are kept aware of all initiatives and developments that affect their health and safety.

As part of regular 1-1 meetings and the Performance Management Framework (PMF) process, all colleagues have the opportunity to raise H&S issues.

#### **6. PROTECTION OF THE PUBLIC**

There are occasions when the activities of whg interface with the general public (other than its customers). On all occasions public safety is paramount. Risk Assessments and methods of work will be used to identify and eliminate risks to ensure the safety of the public.

whg has a legal and moral obligation to safeguard the welfare of children, young people and vulnerable adults who receive its services.

#### **7. RECORD KEEPING**

Records must be kept for the following aspects of H&S management for the time periods shown, unless service-specific regulatory requirements differ:

- Risk Assessments - 3 years
- Contractual records up to 12 years
- Staff Training records – permanently
- RIDDOR reports – permanently
- Accident & Investigation Reports – 40 years

For more details, refer to whg's Document Retention Policy and Schedule.

#### **8. REPORTING AND INVESTIGATION OF ACCIDENTS**

whg is committed to preventing accidents and cases of ill-health to colleagues and others who may be affected by its work activities. However, whg recognises that failures

can occur and will investigate all accidents and ill-health to identify the immediate and underlying causes so as to prevent recurrence

All accidents, incidents and near-misses involving colleagues must be reported as soon as possible, at least within 24 hours. It is the responsibility of all colleagues to record any accident involving them on the company reporting system. If the individual is unable to complete the report themselves, the line manager or the Health, Safety and Environment Team can carry out this task in liaison with the individual. The requirements laid down in the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) will be complied with at all times.

All accidents are to be appropriately investigated. The level of investigation and the responsibility for undertaking it will depend on the seriousness of the incident.

All reportable incidents, as defined by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) will be reported to the enforcing authority within the relevant timeframes. The following types of work-related incident/accident need to be reported:

- Death
- Major Injuries e.g. broken bones, dislocations, amputations, loss of sight etc.
- Any accident where a colleague is away from work or unable to perform their normal duties for more than seven consecutive days (not counting the day of the accident).
- Any non-colleague (i.e. customers, visitors and contractors) being taken directly to hospital
- Certain types of disease e.g. dermatitis, asthma, upper limb disorders, carpal tunnel syndrome, HAVS etc.
- Certain types of dangerous occurrence, even when no-one is injured e.g. electrical fires, etc.

## **9. PERFORMANCE MEASURES**

There are specific performance measures associated with this policy statement contained within the Business Intelligence Framework. H&S performance measures will be contained within the individual policies written to meet specific legislation.

## **10. EQUALITY AND DIVERSITY**

All employers are responsible for managing health and safety risks in the workplace and any tasks their colleagues carry out as part of their jobs, regardless of their abilities or disabilities. An Equality Impact Assessment has been carried out on this policy.

## **11. TRAINING AND DISSEMINATION**

It is mandatory for colleagues read the policy annually. New starters should receive the policy as part of the induction process. The policy is also communicated to contractors and the supply chain as applicable.

whg is committed to investing in a programme of ongoing awareness, training and engagement activities to ensure an effective approach to health and safety. Training

includes classroom, e-learning, external and workshop sessions. All training enquiries can be discussed with the Learning and Development team and the Health and Safety team.

## **12. MONITOR AND REVIEW**

This Policy will be monitored by the Corporate Director of Governance, Compliance and Communications, reviewed annually by the Health and Safety Committee, Executive Team and approved by the whg Board.

## **13. ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES**

Documents related to the policy are as follows:

- Fire Safety Policy.
- Gas Safe Policy.
- Electrical Safety Policy.
- Lift Safety and Maintenance Policy.
- Asbestos Management Policy.
- Legionella Policy.
- Radon Policy.
- All other secondary H&S legislation policies

All whg policies and procedures in relation to health and safety are regarded as supplementary to this policy.

<b>Document author</b>	Head of Health, Safety and Environment.
<b>Document owner</b>	Corporate Director of Governance, Compliance and Communications
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<b>Our 2030 Plan Aim</b>	Deliver a strong business, fit for today and prepared for tomorrow.
<b>Equality Assessment</b>	Completed 8 April 2025
<b>Key changes made</b>	Removed responsibilities and performance measures