

# **Health and Safety Policy**

# 1.0 Purpose and Scope

This policy outlines our approach to health and safety as required by the Health and Safety at Work etc Act 1974. The policy includes:

- A written statement to be produced and revised to declare the organisation's commitment to providing for the safety of its employees and others (Section 2)
- An outline of the roles and responsibilities of persons and teams who will implement the Health and Safety Policy (Section 3)
- Summaries of the various arrangements which have been put in place to ensure that the policy is successfully implemented, the arrangements also contain details of the health and safety management system for the organisation (Section 4)

The policy applies to all employees and volunteers of Notting Hill Genesis.

# 2.0 General Health and Safety Statement

Notting Hill Genesis (NHG) recognises, accepts, and will ensure that all reasonably practicable steps are taken to provide and maintain a safe and healthy environment for its employees, customers, contractors, residents, members of the public and others.

The Board regard the promotion of health and safety as a mutual objective for management and employees at all levels. Health and safety will therefore be integrated into all aspects of our business.

We recognise our statutory obligations, especially our responsibilities under the Health and Safety at Work etc Act 1974, the Management of Health and Safety at Work Regulations 1999 and associated legislation and are fully committed to meeting these obligations. It is accepted that legislation defines minimum standards to be achieved, however the Board are committed to attain higher standards by promoting continuous improvements and the implementation of best practice where it is reasonably practicable to do so.

To achieve these obligations, we appoint competent persons to be responsible for keeping workplace health, safety and wellbeing arrangements under constant review, liaising with the Health and Safety Executive wherever necessary, and keeping the organisation informed of new legislation and associated codes of practice in order to ensure ongoing compliance with the law.

To comply with our statutory and common law duties, we have arranged insurance against liability for death, injury and/or disease suffered by any of our employees arising out of and in the course of employment, if caused by negligence and/or breach of statutory duty. We will, so far as is reasonably practicable do the following:

- Provide safe places of work, with safe access and egress from it. Safe plant, equipment, systems of work and a healthy working environment with adequate welfare facilities.
- Ensure the safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
- Provide appropriate information, instruction, training, and supervision to enable all employees to execute their duties in a safe and responsible manner.
- Prevent ill-health by means of initiatives and campaigns.
- Provide adequate financial and physical resources to maintain suitable health and safety standards.

Employees also have a duty to co-operate and have a positive role to play in matters of health, safety, and welfare by:

- Working always with due regard to safety.
- Using equipment provided for their protection.
- Adhering to policies, procedures, risk assessments and safe working practices.
- Reporting hazards and accidents including near misses.
- Assisting in the investigation of accidents and the implementation of measures to prevent a recurrence.

We support the concept of consultation on health and safety matters and have established the Health and Safety Leadership Group and the Health and Safety Committees to provide forums for such consultation.

This policy will be continuously reviewed to ensure it remains relevant with current legislation and to the organisation and as a minimum will be updated every 3 years.

This policy was agreed by the Board on 19<sup>th</sup> May 2021 and was also signed by the new Chief Executive on 3rd January 2023.

The undersigned certify their full commitment to this policy:

/).....Ian Ellis, Chair of the Board

......Patrick Franco, Chief Executive

.. Vipul Thacker, Group Director of Central Services (Director of Safety)

## 3.0 Organisation

### 3.1 The Board

The Board are ultimately responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare at work of our employees and others who may be affected by our undertakings, acts and omissions.

The Board will ensure that:

- The Health and Safety policy is continuously reviewed and updated every 3 years or following any significant incident.
- The implementation and effectiveness of the health and safety management system is monitored by means of an annual report and reports from the Group Director of Central Services/Director of Health & Safety.
- It is informed about any significant health and safety failures.

The Board has delegated the responsibility for implementing and monitoring the Health and Safety policy on a day-to-day basis to the Chief Executive.

It is important to acknowledge that whilst health and safety functions can, and should, be delegated, legal responsibility for health and safety rests with the Board.

### 3.2 The Chief Executive

The Chief Executive has the day-to-day responsibility for ensuring that the health and safety management system is implemented and remains relevant and appropriate for the undertakings, acts and omissions of the organisation.

To achieve this, the Chief Executive must ensure that:

- Adequate resources are made available to enable us to meet our statutory requirements and to implement the Health and Safety policy.
- Health and safety matters are being effectively co-ordinated and communicated throughout the organisation.
- We have access to suitable and adequate health and safety advice or competent persons to meet our statutory requirements.
- Group Directors, managers and duty holders identified under this policy understand and discharge their health and safety responsibilities, and systems are in place to monitor their performance

### 3.3 The Executive Board

The Executive Board assist the Board and Chief Executive to implement the Health and Safety policy within the entire organisation but also within their own directorate. Within their directorate the Group Directors:

- Accept their individual role in providing health and safety leadership.
- Monitor the implementation of the Health and Safety policy.
- Respond when health and safety issues are brought to their attention.
- Periodically review the effectiveness of health and safety arrangements.
- Ensure that health and safety responsibilities are properly assigned and accepted at all levels.

- Ensure that managers fulfil their health and safety responsibilities, especially the completion of risk assessments and the reporting of accidents and near misses.
- Consult with employees on matters affecting their health, safety, and welfare, and encourage their involvement.
- Ensure the provision of adequate resources to implement the Health and Safety policy and comply with statutory obligations. Resources may comprise people, time and / or money.
- Assess health and safety risks which may affect business objectives and put in place adequate controls to eliminate or manage them effectively.

# 3.4 Group Director of Central Services

The Group Director of Central Services has a responsibility to highlight the need for Board decisions to reflect its health and safety intentions, as set out within the Statement of Intent, when attending Board and Executive Board meetings. As such the Group Director of Central Services will have the title of Director of Safety.

The Director of Safety shall:

- · Act as champion for health, safety and welfare.
- Keep the Board and Executive Board informed of relevant health and safety matters.
- Chair, or appoint a chair to, the Health and Safety Leadership Group and any health and safety committees.

# 3.5 Directors/Senior Leaders and Managers

Responsibilities for implementing and maintaining the standards, as outlined within the Health and Safety policy, are delegated across all levels of management and to employees. For the purposes of this document line manager or manager refers to any person responsible for managing staff unless a specific post reference is required.

Directors/Senior Leaders may delegate any or all these tasks to their managers; however, the responsibilities for ensuring requirements are met remain with the director/senior leader. Where there is no Director for a business area, then the responsibilities automatically fall to the next tier of management.

Within their area of responsibility Directors/Senior Leaders must:

- Ensure risk assessments of the work or workplaces of their employees are undertaken to identify possible 'at risk' groups of staff, and to implement effective procedures and precautions to protect them from possible violence or other threats to their safety whilst at work and to reduce risk to the lowest possible level
- Have arrangements for the pro-active identification of hazards to which employees, customers, members of the public and others may be exposed.
- Eliminate identified hazards or, where it is not reasonably practicable to do so, undertake suitable and sufficient risk assessments to reduce remaining risks to an acceptable level by means of introducing and maintaining appropriate control measures.
- Record significant findings of risk assessments and communicate the findings to employees and others as appropriate.
- Ensure that hazards are made safe and brought to the attention of the next tier of line management and the Health and Safety Team, where it is not possible to adequately control the hazard, the activity must cease.

- Ensure that the Health and Safety policy and any associated documents are implemented.
- Ensure that budgetary provision is made so that all H&S activity in their area can be completed.
- Provide suitable work equipment and ensure that it is used in accordance with manufacturer's instructions and safe systems of work.
- Ensure that systems are put in place for the regular inspection, maintenance and repair of plant and equipment within their area of responsibility.
- Ensure that procedures are put in place to co-operate with all third parties in regard of health and safety information e.g., hazard identification.
- Arrange for suitable and sufficient investigations of all accidents, incidents and near misses to identify root causes and thereby implement any required changes to prevent reoccurrence.
- Ensure that their employees are made aware of their responsibilities under the Health and Safety policy and documents produced in support of it.
- Ensure that employees and service users are consulted appropriately on significant health, safety, and welfare issues.
- Promote a health and safety culture by providing positive health and safety leadership, leading by example, and promoting good health and safety awareness and practices.
- Ensure that relevant contractors and consultants are vetted to ensure they
  possess appropriate health and safety competence (see the project managers
  section below for construction and maintenance works).
- Ensure that all contractors working under their control are made aware of hazards and local rules and are always working safely and that work is stopped if safe working practices are not met.
- Ensure all breaches of our health and safety procedures are acted upon in line with our policies.
- Ensure that employees receive the appropriate training and instruction necessary to give them the competency to perform their role safely and so far as is reasonably practicable, without risks to health.

All managers must have visible, positive behaviour and are responsible for:

- Ensuring that day-to-day health and safety requirements are adhered to at local levels and for ensuring any shortfalls in the health and safety are brought to the attention of their relevant business/senior leader.
- Ensuring the delegated health and safety tasks are carried out within their business area.
- Ensuring the workforce is committed to conducting their activities in a safe manner.
- Addressing health and safety issues during team meetings and encouraging the reporting of accidents and near misses.
- Ensuring that individuals, for whom they are responsible, have the appropriate skills and knowledge to work without risk to themselves or to others.
- Ensuring that day-to-day plant, work equipment, and PPE requirements are adhered to at local levels.

- Managing behaviour related to health and safety practice and procedures and to ensure they lead by example.
- Ensuring details of any missing or faulty equipment are brought to the attention of their relevant business /senior/ operational leader, and to introduce measures to prevent its use until it has been removed or repaired.

# 3.6 Project managers (construction and maintenance works)

As early as possible in any project we assess if the Construction (Design and Management) Regulations 2015 (CDM) apply and whether the project is notifiable.

If a project falls within the auspices of CDM, project managers must appoint a principal designer and a principal contractor and ensure that all information and resources are provided as required to ensure that all requirements placed on NHG as a client under the Regulations are met.

At the end of the contract, the project manager ensures that the s38 fire safety file is received as well as the health and safety file. These key documents will be filed and retained in a way that they are readily accessible by teams.

As client, as a minimum, we will:

- Appoint competent principal designers at as early a stage in the project to ensure that Health and Safety is built into all design work, and through the construction phase and that the principal designer and principal contractor are working together effectively.
- Appoint principal contractors with the relevant skills, experience, and resources to undertake the work
- Ensure there are suitable management arrangements for the provision of welfare facilities.
- Allow sufficient time and resources for all stages / phases of works.
- Provide pre-construction information to principal designers and principal contractors.

As best practice project managers will, where it is reasonably practicable to do so, monitor the appointment of sub-contractors.

### 3.7 Employees and volunteers

Employees, including temporary workers, and volunteers have a duty to:

- Take reasonable care of the health, safety and welfare of themselves or others who may be affected by their acts or omissions at work.
- Co-operate with us, as far as may be necessary, to enable them to carry out their legal duties in health and safety matters. This will include undertaking training where applicable.
- Not intentionally or recklessly interfere with anything provided in the interest of health, safety, and welfare.
- Report all work related accidents, incidents and near misses no matter how minor as well as all known incidents of fire or fire near misses within domestic premises.
- Immediately bring to the attention of their line manager any situations or practices they consider may lead to injury or ill health.

- Maintain good housekeeping in the area in which they are working.
- Use equipment as trained and instructed to work without risk to themselves or to others.

### 3.8 Health and safety team

The responsible Director/Senior Leader for health and safety and the Health and Safety team are appointed as the competent persons as required by Regulation 7 of the Management of Health and Safety at Work Regulations 1999 and are responsible for:

- Producing health and safety related policies incorporating legal requirements, business aims and identifying best practice. These will include all the key areas of compliance and health and wellbeing areas across the organisation.
- Producing the annual health and safety report for the Board.
- Monitor and reviewing the organisations risk map regarding health and safety.

The Health and Safety team have the authority of the Board and Chief Executive to:

- Enter departments at any time in order to obtain information.
- Interview any manager or employee in the course of any monitoring, investigation, inspection or audit.
- Stop work and / or isolate an area if they believe there is an imminent risk of significant harm.

The Health and Safety team are responsible for:

- Arranging the Health and Safety Leadership Group and Health and Safety Committees.
- Advising Board and management regarding the interpretation and compliance of the Health and Safety at Work etc. Act 1974 and other relevant health and safety legislation.
- Providing general information, advice and where appropriate assistance and support regarding health and safety.
- Maintaining the health and safety database.
- Advising in the planning and promotion of health and safety.
- Collating and monitoring accident, incident and near miss reports.
- Assisting in accident investigations as necessary.
- Reporting incidents to the Health and Safety Executive (HSE) as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
- Developing and, where appropriate, conducting relevant health and safety training courses
- The ongoing review of the health and safety management system and making recommendations for improvements as necessary.
- Promoting, encouraging, and raising awareness of health and safety and promoting the prevention of ill-health.
- Advising and supporting all levels of management on local implementation of the Health and Safety Policy and its arrangements.

- Evaluating and interpreting statutory requirements, changes in legislation, new codes of practice and advising the organisation or individuals as deemed appropriate.
- Liaising as necessary with the HSE, Fire authorities and other relevant external bodies.
- Developing and implementing a program of health and safety monitoring, audits and inspections in order to ensure ongoing compliance with legislation and the implementation of initiatives / best practices where it is reasonably practicable to do so.
- Analysing, recording, and making recommendations as a result of, monitoring, audits, inspections and accident investigations.

# 3.9 Human Resources and training

Human Resources (HR) will work closely with the Health and Safety team to:

- Promote good health and safety practice and well-being awareness.
- Develop a positive health and safety culture.
- Discuss occupational health needs and employee welfare provisions.

In addition, HR are responsible for:

- Ensuring, with the support of the Health and Safety team, that all role profiles
  define the post holder's health and safety responsibilities under relevant
  legislation, the Health and Safety policy and our health and safety arrangements.
- Notifying the Health and safety team with details of new starters and leavers.
- Ensuring that the appraisal system allows for the setting of health and safety objectives for managers and employees and for training needs to be reviewed against the health and safety training profile.
- Updating and owning the training matrix which will include health and safety training courses. They may be assisted by the Health and Safety team for work on this.
- Assisting the Health and Safety team to identify health and safety training needs.
- Design and source appropriate training and arrange and promote training.
- Providing information on the participation of mandatory health and safety training.

# 4.0 Health and safety arrangements

This section comprises a summary of the health and safety management system as well as the various policies, procedures and arrangements which have been implemented to ensure that the requirements of health and safety legislation and the commitment of the statement of intent are effectively implemented.

### Reasonably Practicable

So far as is reasonably practicable is a legal phrase which was introduced within the Health and Safety at Work etc Act 1974 and now applies to other health and safety related legislation. The Health and Safety Executive define reasonably practicable as:

"In deciding what is reasonably practicable the seriousness of the risk can be weighed against the difficulty and cost of removing or reducing it. In considering the cost no allowance should be made for the size, nature or profitability of the business concerned. Where the difficulty and cost are high and a careful assessment of the risk shows it to be

comparatively unimportant, action may not need to be taken. On the other hand, where the risk is high, action must be taken whatever the cost".

Therefore, we would not be expected to commit significant resources where the likelihood of harm is low and its severity insignificant but would be expected to where the likelihood is probable and the severity high.

### 4.1 Our Health and Safety Management System

We have adopted the Health and Safety Executive's (HSE) occupational health and safety management system – Plan, Do, Check, Act - which is described in detail within the HSE guidance document HSG65 "successful health and safety management".

- Plan When reviewing the Health and Safety Policy it is important to ensure it
  meets the legal requirements associated with its undertakings, prevents
  associated health and safety risks and allows a prompt end effective response
  when problems arise. It will be most effective if it can adapt to changing
  situations and this can be achieved by determine our current position, future
  goals, to decide how to measure performance and account for any possible
  changes.
- Do Executing a successful Health and Safety policy means ensuring, so far as is reasonably practicable, the health and safety of employees and anyone else involved in our undertaking such as contractors, residents and members of the public. It is important to ensure that risks associated with those undertakings are assessed and compiled into the organisations risk map to help align our activities to realise the risks and implement the plan through concerted, organisation wide efforts.
- Check Implementing the Health and safety management system is pointless if the results are not evaluated. This can be done in many ways. Specific reports would address individual incidents and how well the arrangements were to deal with them. Other options would include monitoring and auditing arrangements. Measuring the success of the health and safety management system should not rely solely on paperwork but should incorporate active involvement from the health and safety team to assess its success.
- Act After reviewing the effectiveness of the health and safety management system or specific arrangements it is vital that the findings are acted upon to ensure continuous improvement.

Health and Safety Budgeting

Health and safety budgets are incorporated into the annual budgets held by Directors, Senior Leaders and Managers. Significant unforeseen costs that could exceed existing budgets are escalated to the appropriate Executive Director.

# 4.2 Communication and reporting

The Health and Safety Leadership Group/Committee, chaired by the Group Director of Central Services and comprising key Directors/senior leaders and appointed members of the of Health and Safety team, meets bi-monthly to discuss policies and health and safety at a strategic level.

Health and Safety Committee, chaired by the Group Director of Central Services and/or one of the H&S team as nominated by the Group Director of Central Services and attended by a staff forum representative, Union representative, managers and other nominated personnel, meets bi-monthly to monitor health and safety performance, discuss health and safety issues and report to the Health and Safety Leadership Group.

In addition to the above forums, health and safety matters are discussed and communicated throughout the organisation using a range of communication methods.

These arrangements ensure that the requirements of the Safety Representatives and Safety Committees Regulations 1977 and Health and Safety (Consultation with Employees) Regulations 1996 are met.

### 4.3 Emergency Response

Plans and preparations for emergency response are in place.

#### **Business continuity plans**

Business continuity plans are prepared by each area of the business to ensure their critical work processes can be continued safely and/or recovered within acceptable timeframes. Plans are subject to desk-top testing by each part of the business, to ensure their own preparations are sufficient and credible.

#### Fire safety plans

Fire safety plans specific to each building which ensure that building users are briefed on the plans specific to their building, key information is also provided on fire action notices displayed within the building, an appropriate number of fire wardens are maintained for each building.

Fire evacuation plans are tested twice per year, through a fire drill of each building and plans are also subject to review by the building management and/or Health and safety team.

#### First aid

First aid facilities are provided in each workplace, dependent upon the first aid assessment. Facilities may include first aid kits, burns kits, appointed persons, trained first aiders and / or first aid rooms.

Information about the facilities available in each building is made available to all building users, either via the company intranet or through information posted in the building.

First Aiders or first aid trained employee will be provided in each building. There will be sufficient numbers, as identified by a risk assessment, to ensure that appropriate cover is provided should first aid treatment be required. Notices will be displayed giving the contact details of first aiders.

Adequate first aid equipment will be held at key locations within workplaces.

First aid facilities are reviewed by building management annually or after any significant incident to ensure that the risk assessment is still valid, all required facilities are in place and sufficient information so that building users know how to obtain first aid assistance.

# 4.4 Training

Every employee is provided with adequate health and safety training on commencement of employment in the form of an induction programme and where necessary with the provision of training before certain tasks or duties are undertaken.

This also will take place before staff are exposed to new or increased risk due to:

- Transfer or a change of responsibility within NHG
- The introduction of new work equipment
- The introduction of new technology
- The introduction of a new system of work

Mandatory learning (including online health and safety courses) must be completed by new employees to pass probation.

The Talent and Learning team will develop a training profile which sets out mandatory, desirable and other training courses.

# 4.5 Arrangements for managing health and safety

The Health and Safety team develop the high-level policies, the detail of how these are complied with, and the arrangements for managing health and safety (the detailed procedures) are determined by the teams with specific responsibility. A summary of the requirements outlined in the policies are set out below:

#### Asbestos

Our Asbestos management plan outlines the various safeguards that are to be followed so that employees, contractors, customers, members of the public and others are not exposed to asbestos, so far as is reasonably practicable.

#### Gas

Under the Gas Safety (Installation and Use) Regulations 1998 we ensure maintenance of all pipe work, appliances, and flues, which we own and have provided to tenants for their use and arrange for an annual gas safety check to be carried out, by a "Gas Safe" registered engineer

#### Electrical

Mains electrical services are routinely tested, maintained and where necessary replaced, to comply with legal requirements.

We ensure that all domestic wiring installations are designed, constructed, inspected, tested, and certificated to meet the requirements of the Institution of Electrical Engineers (IEE) Wiring Regulations.

Electrical wiring systems are subject to periodic testing and inspection to ensure that it remains safe. Initial inspections following installation, or a re-wire take place after 10 years and thereafter five years unless deemed sooner by the inspector.

Portable electrical appliances that are our responsibility are tested on a frequency based on the assessment of risk (considering the use, environment, vulnerability, and condition of the appliances). A record of all inspections and tests will be kept.

Any damaged electrical equipment is taken out of service immediately and clearly marked to show that it is not to be used until appropriate repairs have been carried out.

#### Fire

A fire risk assessment programme is in place for all applicable locations (common areas of housing blocks and all workplaces). All corrective actions resulting from the programme are prioritised for attention and resolution. Other duties are required via the Building Safety Act 2022 and Fire Safety Act 2021 which are gradually coming into law over the next period which NHG have plans to implement as and when required.

#### Legionella

A programme of risk assessments, routine monitoring and testing, and remedial works (where required) is in place to control the risk of legionella in our water systems.

#### Harmful substances

Any harmful substances (including toxic, very toxic, harmful, corrosive, irritants, extremely flammable, highly flammable, flammable, explosive, oxidising or environmentally unfriendly products) that cannot be eliminated are risk assessed.

Employees must comply with the working practices and emergency procedures as outlined within those risk assessments and accompanying safety data sheets before they work with hazardous substances.

# 4.6 Arrangements for employees

We will ensure the health and safety of our employees by:

#### Welfare

We will provide a workplace that has ventilation, temperature and lighting that is suitable, sufficient and appropriate to the premises and the tasks at hand.

We will provide suitable and sufficient sanitary and washing facilities and drinking water.

Adequate workspace will be provided that takes into account staff job description and the equipment and furniture staff need to do their job. Traffic routes and floors will be kept clear of obstructions and maintained in a safe condition.

#### Mental Health First Aiders

We have staff trained as mental health first aiders who provide the initial support to staff if they are in need of help, which is about listening without judgement and assessing what the appropriate next steps are, then contacting or signposting to relevant agencies.

### Arrangements for disabled employees

Employees that have a long or short-term disability should discuss their needs with their manager or HR representative where this may affect their work or where adjustments to their workstation / workplace may be required.

Employees that may experience difficulties in evacuating a workplace in the event of fire or an emergency situation will have a Personal Emergency Evacuation Plan (PEEP) compiled by their manager in consultation with the Business Services team.

#### Display screen equipment

Staff deemed as a user of display screen equipment will undertake training and an assessment which examines the possible workstation layout, the position and posture of the user and the working environment. Staff have access to eyesight screening and, if required specifically for computer use, subsidised glasses.

As part of their role, staff may be able to work from home. If staff do work from home, they must do safely as guided by the DSE training. If staff are not able to work from home safely then they must work from the office.

### Driving for work

Staff must possess a valid driving licence that is appropriate for the vehicle to be driven and must ensure that they inform their manager if for any reason they cannot operate that vehicle safely.

#### Manual Handling

Wherever possible the practice of manual handling will be avoided by mechanically moving loads. However, where this is impractical and manual handling is necessary, a risk assessment will be undertaken. Training in lifting techniques will be given to staff if appropriate to their work activities.

### Personal protective equipment (PPE)

PPE will only be used as a last resort once other control measures have been considered and found not be to appropriate.

PPE must be suitable and sufficient to protect staff from the hazard, fit them and be provided to them at no cost. Lost or damaged equipment must be reported immediately and will be replaced. Managers are responsible for ensuring that all staff wear the appropriate protective equipment as determined by risk assessment

Safe system of work

We operate a safe system of work bringing together materials, people, plant and equipment to ensure that hazards are eliminated, or risks are minimised to an acceptable level. Safe systems of work must be recorded and issued and made available to employees.

All equipment used for work, including any machine, appliance, apparatus, or tool, will be selected for its suitability for the task. It will be properly maintained by competent people, inspected at regular intervals and staff will only be asked to use this if they have received sufficient information, instruction and supervision to make them a competent person.

**Lone Working** 

In order to minimise the risk of harm if staff work alone or come into direct contact with customers or members of the public they will receive adequate information, instruction and training in recognising and dealing with potentially hazardous situations and will be provided with an appropriate personal safety device.

Accidents at work

Staff must report all accidents and near misses to their line manager and also the Health and Safety team. The Health and Safety team will evaluate accident and near miss reports to identify trends which will be reported to the Health and Safety Committee and Leadership Group.

**Public Health / Pandemics** 

In times of Pandemic the Health and Safety team will work closely with the organisation to interpret government guidance to reduce the transmission and corporate risk corporately.

### 5.0 Auditing and Review

Auditing is critical to the success of the Health and Safety Policy to ensure that we meet our statutory requirements and that best practices are implemented where required. We will aim to use the following as a minimum to promote and ensure compliance:

Internal auditors – one audit per year of a key health and safety risk

This policy will be reviewed on an annual basis or following a significant incident.

### 6.0 Our approach

In writing this policy we have carried out a diversity and inclusion impact assessment. The assessment has identified several opportunities to improve accessibility of health and safety information including how we communicate with those for whom English is a second language and guidance for managers on the development of PEEPs.

The policy does not involve the use of personal, sensitive information so it has not been necessary to carry out a privacy impact assessment.

We have carried out limited consultation with staff in the development of this policy, wider consultation will be carried out as required on the detailed policies which support this document as they are developed.

# 7.0 Reference

Key legislation in this area is referred to in the body of the policy.

### **Document control**

| Author               | Director of Health and Safety and Business<br>Services |
|----------------------|--|
| Approval date        | May 2021   |
| Effective date       | May 2021   |
| Approved by          |  |
|                      | Group Board  |
| Policy owner         | Director of Health and Safety and Business             |
|                      | Services   |
| Accountable Director | Group Director of Central Services                     |

### **Version Control**

| Date Amendment |   | Version |
|----------------|---|---------|
| April 2018     | New Notting Hill Genesis policy created         | 1.0     |
| May 2021       | Reviewed  | 1.1     |
| Nov 2022       | Reviewed and new CEO name included and sign off | 1.2     |

### Health and Safety - NHG EB Roles and responsibilities

- The Chief Executive has the day-to-day responsibility for ensuring that the health and safety management system is implemented and remains relevant and appropriate for the undertakings, acts and omissions of the organisation.
- The Executive Board assist the Board and Chief Executive to implement the Health and Safety policy within the entire organisation but also within their own directorate.

### Specific Responsibilities

#### **Group Director of Central Services**

- Nominated Group Director of Safety. Liaison with the Board Health and Safety Champion on all H&S matters.
- Ensuring that NHG has up to date policies and procedures relating to H&S matters in terms of its landlord and employer obligations.
- Provide assurance to EB and Board that NHG is meeting its statutory and policy H&S obligations as a landlord and as an employer.
- Keep the Board and Executive Board informed of relevant health and safety matters by providing regular updates and a 6 monthly and an annual H&S report.
- Responsible for delivering NHG legal and policy obligations (and performance reporting against targets) relating:
  - o H&S Training
  - Personal safety of staff
  - o Display Screen Equipment
  - Incidents and Accidents
  - Staff welfare and well-being
  - o Manual handling, PPE, safe systems
  - o Monitoring H&S compliance across the organisation
- Coordination and management of NHG emergency response and business continuity arising from health and safety issues.

### **Group Director of Assets and Sustainability**

- Delivering NHG legal and policy obligations (and performance reporting against targets) relating to NHG assets including
  - Gas safety
  - Domestic and communal electrical safety
  - o Water
  - Asbestos
  - o Fire Risk assessments
  - Fire Brigade and Local authority Notice of Deficiencies (NoD's) and Enforcement Notices
  - Mechanical and Electrical
    - Lifts, electrical gates, fall arrests, Portable Appliance Testing, emergency lighting etc.
    - Procurement and management of asset compliance

#### contractors ensuring H&S matters are covered.

### Group Director of Development (including Sales and Building Safety)

- Responsibility for meeting NHG H&S obligations relating to Construction and Design Management and Development projects.
- Ensuring that NHG has relevant and up to date policies and procedures relating to Construction and Design Management and Development projects.
- Provide assurance to EB and Board that NHG is meeting its statutory and policy relating to Construction and Design Management and Development projects.
- Keep the Board and Executive Board informed of H&S matters, relevant Construction and Design Management and Development projects.
- Procurement and management of Construction and Design Management and Development projects ensuring H&S matters are covered.
- · Responsibility for meeting NHG legal obligations relating to Building Safety
- Ensuring that NHG has relevant and up to date policies and procedures relating to Building Safety
- Provide assurance to EB and Board that NHG is meeting its statutory and policy relating to Building safety obligations
- Keep the Board and Executive Board informed of relevant H&S Building safety matters.
- Procurement and management of building safety contractors ensuring H&S matters are covered.