



Title:	Health Safety and Welfare Framework
Person responsible:	Cath Purdy, Chief Executive
Customer consultation arrangement:	SLH Forum and Managers Forum Tenants' Committee
EIA required:	No
EIA completed (date):	N/A
Approved by:	Audit & Risk Committee for review, then Board for approval, August 2022
Business Strategy Objective	Growing
Approval date:	August 22
Links to other key policies:	SLH Health & Safety Action Plan Asset Management Strategy Accident Incident Policy Lone Working Policy Driving for Work Policy Welfare (PPE, DSE, Noise and First Aid, Health, Accident, Incident) Policy Safety (Manual Handling, Working at Height, Working with Equipment, COSHH) Policy CDM 2015 Policy Safety Management System (manual system) Agile Working Framework Health & Wellbeing Policy
Review date:	August 24

Document management		
Version	Date amended	Amendments
1	April 2019	First version in new policy template
2	April 2020	Update to the previous policy – key focus on; definition & vision, culture, competency and accountability
3	June 2021	Alignment to Business Strategy and People Strategy. Update on building safety legislation and social housing white paper. Strengthened section on monitoring and communications, reference to SLH Health & Safety Action Plan. Inclusion of Building Safety Manager. Minor amendments elsewhere.
4	August 2021	Review by Napthens
5	June 2022	Review to reflect changes associated with OD and policy changes associated with the new Building Safety regime. It also incorporates lead

		accountability for consumer H&S issues as required under the Social Housing Regulation Bill (Director of Homes).

1. Purpose

This document outlines South Lakes Housing's framework on Health, Safety and Welfare at work, and safety as a landlord. The aim of the policy is to comply with health and safety legislation and regulations but also to facilitate a culture of managing safety and promoting a healthy workplace and safe places to live.

This will be achieved by focussing on the following:

- Statement on Health, Safety and Welfare
- Organisation competency and responsibility (the application of the 3 lines of defence structure)
- Arrangements
- Audit
- Enforcement

These are set out in more detail under Section 4 and in the supporting policies, policy statements, procedures, method statements and risk assessments.

What we mean by Health and Safety?

Health and Safety is about creating the right culture and conditions whereby people can go about their day/task without harm.

2. Regulatory and Legislative Requirements

This framework commits SLH to comply with The Health and Safety at Work Act (HSWA) 1974 and all relevant Legislation relating to our activities as a Landlord and an Employer.

<https://southlakes.sharepoint.com/:w:/r/sites/Corporate/Quality%20and%20Performance/Data%20%20Audit%20Reports/Health%20%26%20Safety%20Action%20Plan/RACI%20Matrix%20H%26S%20Legislation-SLH%20HS%26W%20Pol%20Appendix.docx?d=w6df8de474a7140d1b8de5d6031777869&csf=1&web=1&e=VqOgAf>

3. Principles

The overall aim of this policy is to ensure that as a minimum SLH complies with health and safety legislation but also to provide a framework for facilitating a health, safety and welfare culture.

SLH adopt the 3 lines of defence model to manage Health, Safety & Welfare risk.

1st line, Business operations or functions that own, manage and control risk.

2nd line, Oversight functions that facilitate and monitor the application of policies, plans, processes and procedures.

3rd line, independent assurance through auditing.

The Committee identifies the role of the Business Improvement Directorate (Head of Governance & Risk with appropriate 'competent person' advice from third parties) as 2nd line of defence, and that the Management and Leadership structure at SLH is the 1st line of defence. 3rd line is internal audit.

4. Health, Safety and Welfare –

Our Approach

This divides in to five areas: 4.1 Statement, 4.2 Organisation, competency and responsibilities, 4.3 Arrangements 4.4 Audit 4.5 Enforcement.

4.1 Statement.

Chief Executive’s Statement of Commitment

Our Health and Safety vision?

Health & Safety is not just about complying with the law, it is an integral part of our new Business Strategy. The strategy contains a bold target to achieve best practice (through the ISO accreditation) as part of our vision;

- Where everybody feels valued, consulted and safe
- Where everyone receives the right training and support to perform their jobs competently and safely
- Where working safely is recognised and rewarded
- Where people ‘speak out’ about health and safety concerns
- Where managers relentlessly drive the health & safety message forward, are visible and approachable
- Where there is continuous improvement which can be ‘seen’ by stakeholders
- Where lessons are learned from errors, violations near misses and stakeholder feedback
- Where there is a ‘just culture’, which is the balancing point between ‘no blame’ and ‘no accountability’

SLH and its subsidiary company, Cumbrian Housing & Property Services Ltd (CH&PS) are committed to safeguarding the health safety and welfare at work of all employees, contractors, sub-contractors, visitors and those who may be affected by its work activities.


As Chief Executive I accept the duties and obligations imposed upon me by all relevant safety legislation and realise the importance of placing health safety and welfare as an over-riding priority within SLH. The SLH Board and the SLH Executive Management Team will support me in this role.

Subsidiaries to SLH shall generally conduct themselves in accordance with and with reference to this and all other relevant SLH policies. These statements shall be held as sub-files to this framework.

Whilst accepting the legal standards set by national legislation, SLH is committed to promoting a shared safety culture that aims to produce the highest standards of health safety and welfare. This process will continue to raise standards within SLH beyond the legal requirements. I believe that achieving these high standards will positively contribute to the overall quality of the work environment and services provided by SLH. I will make available sufficient resources to ensure that they are met.

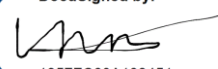
I accept that although the final level of responsibility for implementing SLH’s Health Safety and Welfare framework rests with me, each and every individual employee must take an active role in effectively implementing the framework in line with the responsibility’s framework set out in the ‘Organisation’ section. I urge all employees to co-operate fully in the measures that SLH will be taking as part of this framework, to ensure that their work situations are as safe and healthy as possible.

The SLH Executive Management Team will deputise for me as required on Health, Safety and Welfare matters.

Cath Purdy Chief Executive	DocuSigned by:  344DE34A1FBA42A... 10-Oct-22
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Board Chair's Statement of Commitment

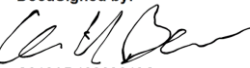
As Chair of the Board, I know we want to not only be assured that we are meeting legal expectations but make sure we have a culture which ensures that the safety of our colleagues and customers is paramount and that we have a renewed focus on health and welfare. On behalf of the Board, I will ensure that the Board will not only seek assurances that we comply with the relevant regulations, but our governance framework will help to develop a culture of not just the 'safety' elements but also a renewed focus on the 'health' part too.

Ian Munro Chair of SLH Board	DocuSigned by:  1357FC60A103451... 11-Oct-22
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This statement of commitment is fully endorsed by the representatives of key stakeholders.

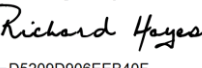
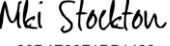
ARC Chairman's Statement of Commitment

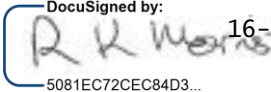
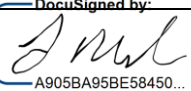
On behalf of the Audit and Risk Committee, I will ensure that the Committee will review compliance in relation to Health Safety and Welfare and report exceptions to the Board. The Committee will support the promotion of Health, Safety and Welfare across South Lakes Housing.

Keith Bevan Chair Audit and Risk Committee & Senior Independent Director	DocuSigned by:  C018AD40863640C...
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EMT's Statement of Commitment

On behalf of the Executive Management Team, I will ensure that my Directorate will not only comply with the responsibilities laid out in this framework but will lead by example and promote a culture of Health, Safety and Welfare across South Lakes Housing.

Richard Hayes Director of Homes	DocuSigned by:  D5209D906FEB40E... 20-Sep-22
Niki Stockton Director of Customer Experience	DocuSigned by:  30D4E90F1DB1426... 16-Sep-22

Richard Morris Director of Finance	DocuSigned by:  16-Sep-22 5081EC72CEC84D3...
John Mansergh Director of Business Improvement	DocuSigned by:  11-Oct-22 A905BA95BE58450...

4.2 Organisation, Competency and Responsibility

Board Directors

The leadership of an effective health and safety culture comes from the top; Members of the SLH Board have both collective and individual responsibility for the leadership of health safety and welfare (as well as compliance). Executive Directors and Board Members shall continually examine their behaviours, both individually and collectively, against guidance and information given and available - and, where they see that they fall short of the standards it sets them, shall become more effective leaders in health, safety and welfare.

What is competence?

“The essence of competence is relevance to the workplace. What matters is that there is a proper focus on both the risks that occur most often and those with serious consequences.

Competence is the ability for every director, manager and worker to recognise the risks in operational activities and then apply the right measures to control and manage those risks.”

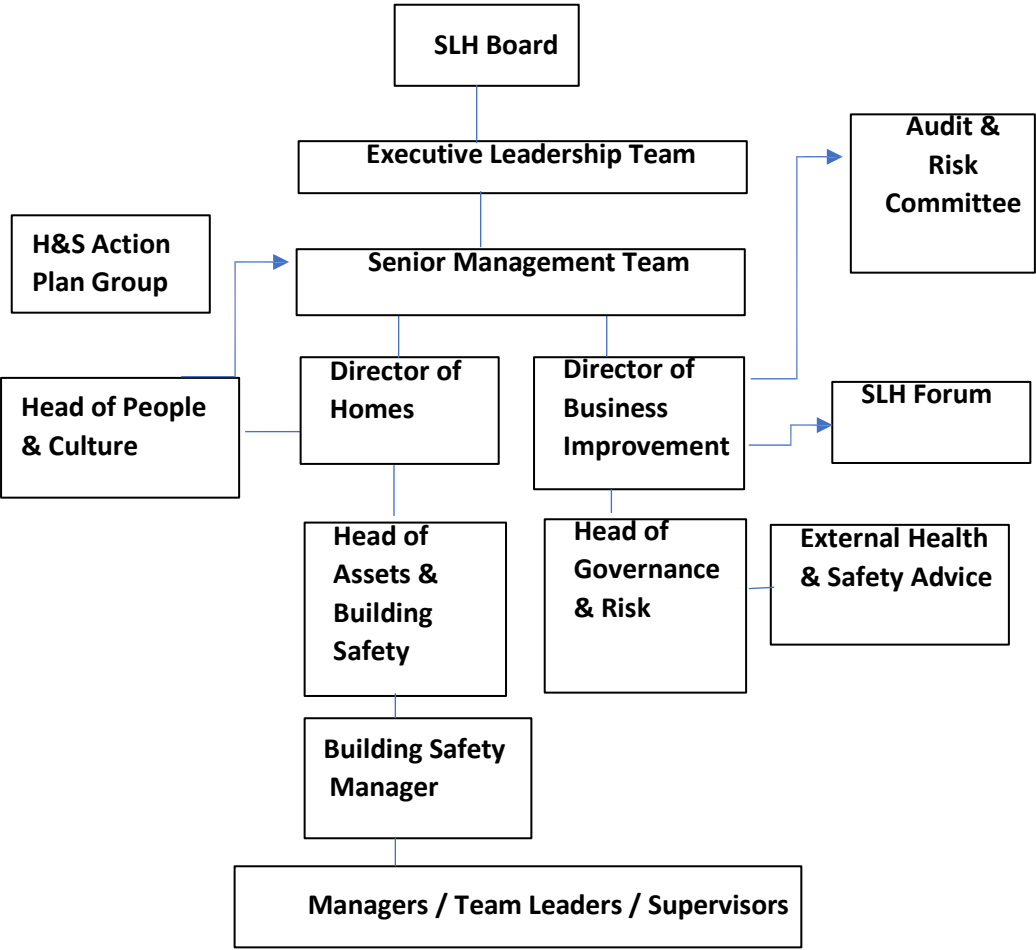
Judith Hackitt, HSE’s Chair (2008-2016)

Board Members shall seek the information and training appropriate to achieve at least minimum competency for their role and responsibility.

They shall also perform a scrutinising role, ensuring the integrity of processes primarily through the following;

- The Audit and Risk Committee ‘terms of reference’ include identification of key areas for improvement in business management of the health & safety management.
- The Audit and Risk Committee monitoring of Health Safety and Welfare compliance via a quarterly ‘compliance’ report, including Health Safety and Welfare dashboard and ‘deep dives’.
- The Audit and Risk Committee approving an annual Internal Audit plan which involves receiving assurance on Health Safety and Welfare compliance (three-year cycle).
- The Audit and Risk Committee monitoring the implementation of Internal Audit report recommendations.
- The Board receives quarterly performance and risk reports, including exception reporting on Health & Safety.
- The Board receives an annual Health and Safety Report, from the Business Improvement Directorate.
- Board Members receive appropriate training to ensure their competence in their scrutineering role.
- Beyond scrutiny the Board directs responsibility for Health, Safety and Welfare to the Chief Executive and the Executive Management Team.

Health & Safety Organisational Structure



Executive Management Team

As well as having duties under SLH's Health, Safety and Welfare Statement, the Directors lead the 1st line of defence and are personally responsible for the effective implementation of the Health, Safety and Welfare Framework in their areas and will ensure they are competent to;

- ✓ Provide leadership on occupational health, safety and welfare to their managers, employees, contractors and sub-contractors and support improvements in safety standards and culture.
- ✓ Shall accept 'Competency Challenge' and participate in recognised Health Safety and Welfare training for their responsibilities.
- ✓ Shall appoint and ensure that all staff under them are competent to fulfil the duties and responsibilities assigned to them, shall identify and commission appropriate Health Safety and Welfare Training for their staff.
- ✓ Shall fully and clearly assign duties and responsibilities.
- ✓ Appropriate arrangements are in place for access to Health and Safety advice.
- ✓ Will consult with the Head of Governance & Risk and any other employees to monitor the need for any further Health, Safety and Welfare measures, instruction or training to ensure the health, safety and wellbeing of all employees and other people who may be affected by the activities of their area.
- ✓ Will consult with the Managers and other employees to keep informed of any accidents, incidents or Health, Safety and Welfare issues occurring within their area.
- ✓ Will provide resources for 'competent person' advice.
- ✓ The Executive Management Team reviews progress against agreed improvement actions and targets as part of the Health & Safety Action Plan. The Business Improvement Directorate (Head of Governance & Risk) will oversee health and safety compliance and management systems. The Head of People and Culture is responsible for People related health and safety, with the Director of Homes responsible for Health & Safety obligations towards customers.

What is Safety Management?

"I also believe it is important that the true role of those who are charged with managing safety is properly understood -especially by senior managers and leaders. Those whose job title is "safety management" are there to ensure that everyone else is playing their part in managing safety as an integral part of every person's job. It is not to do it for them and most certainly it is not possible for senior managers to delegate the leadership of safety to one director or individual. Acting as the conscience or the champion of safety within an organisation is one thing - fragmentation of functions to the extent that senior managers believe that safety responsibility belongs with someone else is another."

Judith Hackitt, HSE's Chair (2008-2016)

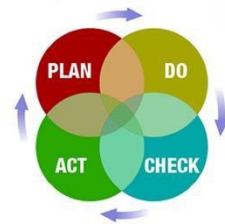
Director of Business Improvement (Director Responsible for Health Safety and Welfare) (*John Mansergh appointed – NEBOSH Certificate in Health and Safety Leadership*).

The Director responsible for Health and Safety compliance is accountable to the Chief Executive and the Board for all matters relating to health, safety and welfare of colleagues and those affected by the company's operations.

The Director will:

- ✓ Ensure that the HS&W framework is reviewed at least annually and that it is adopted and signed by all stakeholder representatives.

- Ensure that the signed framework is lodged in the policy folder and ensure that it is effectively communicated to all staff.
- Ensure that the sub-policies to the HS&W framework, pertinent to their accountabilities are reviewed at least annually and that they are fully adopted, placed on the policy register and communicated to staff and contractors by senior managers.
- Understand and ensure that the implications and duties imposed by new or revised Acts of Parliament, Statutory Instruments, HSE. Guidance Notes and Codes of Practice are brought to the attention of the Executive Team and the SLH Board.
- Ensure that company related health and safety matters are brought to the attention of the Executive Management Team and the SLH Board at regular intervals and maintain reporting structures.
- Ensure that good communications and consultation exist between employer and employees and that they are maintained.
- Liaise with the Managers over the full range of their duties and responsibilities, with respect to inspections, audits, report recommendations, changes in legislation and advice obtained from other sources and enable the uninhibited reporting to the Executive Team and the Board.
- Ensure adequate means of distributing and communicating health, safety and welfare information obtained from the HSE, safety organisations and Trade associations regarding, new techniques of accident prevention, new legislation requirements and codes of practice etc.
- Ensure that an adequate programme of training for health and safety is established and that the safety culture is encouraged amongst employees.
- Oversee the monitoring of incident reporting, recording and investigation, including HSE notifications and RIDDOR reporting.
- Ensure they are competent to manage health and safety (with the necessary skills, knowledge, training, experience and attitude).
- Set a personal example at all times by using the correct personal protective clothing/equipment and following all safety requirements and procedures.



Head of Governance & Risk

The Head of Governance and Risk provides the 2nd line of defence at SLH, enabling the Safety Management System (SMS) and providing uninhibited independent monitoring and reporting of the application of SLH plans, policies, procedures and processes (Provision 7. MHSW regs 1999 & HSE HSG 65), they will;

- Promote a positive occupational Health, Safety and Welfare culture that aims for the highest standards from all members of the organisation.
- Produce regular performance reports on health, safety and welfare compliance issues.
- Monitor SLH's Safety Management System and report to senior management on occupational safety performance and standards.
- Develop a plan to achieve ISO 45001 accreditation for Occupational Health and Safety management system.

- Advise others and monitor the implementation of Dynamic Risk Assessments and Codes of Safe Working Practices during emergency and business continuity events.
- Advise and inform directors, managers and employees on all aspects of occupational health, safety and welfare and provide advice on new legislation and codes of practice impacting on the work of SLH.
- Make available 'competent person' advice.
- Attend meetings, provide advice, training and undertake site visits to monitor the practice of health, safety and welfare.
- Monitor the maintenance of health and safety related accreditations.
- Monitor incident reporting, recording and investigation, including HSE notifications and RIDDOR reporting.
- Have the authority to stop work in cases where there is a risk of serious personal injury or death.
- Maintain own professional development.
- Reporting line to Director of Business Improvement.

Director of Homes - Director nominated responsible for the safety of residents, 'Safety Officer' - 'Accountable Person' (*Richard Hayes appointed*)

The Director responsible for tenant and building safety is accountable to the Chief Executive and the Board for all matters relating to health, safety and welfare of customers, residents and those affected by the company's operations. The Director will be named with the Regulator of Social Housing as the primary lead for health and safety obligations to tenants and this will also be published on the SLH website.

The Director responsible for customer, resident safety will:

- Ensure that the sub-policies to the HS&W framework, pertinent to their accountabilities are reviewed at least annually and that they are fully adopted, placed on the policy register and communicated to staff and contractors by senior managers.
- Understand and ensure that the implications and duties imposed by new or revised Acts of Parliament, Statutory Instruments, H.S.E. Guidance Notes and Codes of Practice are brought to the attention of the Executive Team and the SLH Board.
- Ensure that landlord related health and safety matters are brought to the attention of the Executive Management Team and the SLH Board at regular intervals and maintain reporting structures.
- Ensure that good communications and consultation exist between employers, employees and contractors and that they are maintained.
- Ensure they are competent to manage customer/client health and safety (with the necessary skills, knowledge, training, experience and attitude)
- Ensure that reported incidents are investigated and that lessons learned inform policy and procedure and that updated safety responses are communicated.
- Set a personal example at all times by using the correct personal protective clothing/equipment and following all safety requirements and procedures.

Head of Assets & Building Safety and Building Safety Manager

In support of the Director of Homes, the Head of Assets and Building Safety is key to ensuring building safety. This relates to all areas of compliance, including but not limited to, asbestos, fire, gas, electrical systems, water hygiene, radon and lifting equipment, are effectively managed and meet all regulatory, good practice and legal obligations, ensuring the safety of our properties, tenants, colleagues and visitors.

The Building Safety Manager is responsible for leading and managing the team and contractors in delivering SLH's obligations in these areas and providing an effective risk management and proactive approach. The Building Safety Manager is also responsible for ensuring quality services are delivered within budget and leading on the development of effective business systems to enhance our compliance data, reporting and service delivery.

Managers

Each Head of service and Manager will actively lead the 1st line of defence and be responsible for the day-to-day operation of all Health, Safety and Welfare systems and procedures within their Service Area.

They will be responsible for the effective implementation of this framework and linked Health, Safety and Welfare Resources within their area of responsibility and should demonstrate their competency to do so. They will carry out the following duties;

- ✓ Provide leadership on occupational health, safety and welfare to their teams and support improvements in safety standards and culture.
- ✓ Agree and monitor Health, Safety & Welfare standards with contractors and maintain folders throughout the work, project or contract.
- ✓ Participate in recognised Health Safety and Welfare training appropriate to their responsibilities.
- ✓ Shall appoint and ensure that all staff under them are competent to fulfil the duties and responsibilities assigned to them, shall identify and commission appropriate Health Safety and Welfare training for their staff (alongside the Head of People and Culture).
- ✓ Ensure that occupational health, safety and welfare issues are taken into account in all service development plans and at the design stage of new initiatives.
- ✓ Satisfy themselves that the established safety standards are maintained and arrange for any shortcomings in safety standards, inspections, training and instruction are rectified.
- ✓ Keep themselves informed of any accidents, incidents and Health, Safety and Welfare issues occurring in their area of responsibility.
- ✓ Monitor the necessary records for further Health, Safety and Welfare measures, instruction and training.
- ✓ Ensure that suitable and sufficient risk assessments and method statements are carried out in their area of responsibility. These should be recorded, shared with the relevant staff, and reviewed at least yearly (or sooner if there is any significant change), and modified if necessary. Ensure that all employees in their area of responsibility have been informed of any risks to their health and safety.

- Ensure that they and their teams are complying with lone worker risk assessments and using appropriate lone worker devices or procedures and following escalation procedures.
- In the absence of the Senior Manager a named competent officer will deputise on all matters involving Health, Safety and Welfare at work.

Other officers with management/supervisory responsibility

Staff who manage, supervise or have responsibility for employees, contractors, sub-contractors, trainees or members of the public lead the 1st line of defence and are accountable for Health, Safety and Welfare within their management control. They will;

- Provide management of occupational health, safety and welfare to their staff and support improvements in Health, Safety and Welfare standards and culture.
- Participate in recognised Health Safety and Welfare training appropriate to their responsibilities.
- Shall ensure that all staff under them are competent to fulfil the duties and responsibilities assigned to them, and that they attend assigned Health Safety and Welfare Training.
- Ensure that occupational Health, Safety and Welfare issues are taken into account at the design stage of new initiatives and projects.
- Be responsible for taking the necessary steps to ensure the health, safety and wellbeing of all employees, trainees and other persons who may be affected by work activities (e.g. visitors, members of the public, contractors and subcontractors). These steps should be recorded on method statements.
- Continually assess the risks to Health, Safety and Welfare in their area of responsibility. Ensure that all significant hazards arising in their area of responsibility are adequately addressed.
- Where risks cannot immediately be eliminated, ensure that reasonable action is taken to reduce the risk to the lowest level practicable. These actions should be recorded on a risk assessment form and brought to the attention of those affected.
- Ensure that accidents and incidents within their area of responsibility are reported promptly, as required by the Accident Reporting Procedure and ensure that incidents are investigated, and reasonable action is taken to prevent a recurrence.
- Ensure that all members of staff in their area of responsibility receive appropriate Health, Safety and Welfare training, with specific regard to the safety of themselves and others, and have sufficient knowledge, skills and information to carry out their work safely.
- Ensure that new staff are given an appropriate workplace safety induction during the first week at work.
- Ensure that they and their staff are kept up to date with all relevant Health, Safety and Welfare information (e.g., consult the Health & Safety website portal regularly).
- Ensure that all employees (including contractors and sub-contractors), where required, have appropriate protective equipment and clothing, and are given suitable information, training and instruction on its use.

- Ensure that they and their teams are complying with lone worker risk assessments and using appropriate lone worker devices and following escalation procedures. Managers will monitor usage of lone worker devices and deal with any performance issues.

All employees, and agency staff working for SLH

All directly employed personnel will;

- Comply with safe systems of work and procedures at all times whilst at work and conduct themselves in such a manner so that they, or other people, are not put at risk by their activities.
- Co-operate with supervisors and managers on all matters affecting Health, Safety and Welfare at work.
- Participate in recognised Health Safety and Welfare training for their responsibilities.
- Report any hazard or defects that may affect health safety and wellbeing to their supervisor or manager immediately.
- Immediately report all accidents, incidents and near misses occurring in their area of work to their manager/supervisor and follow the accident/incident reporting procedure.
- Wear the necessary protective clothing and use the correct safety equipment and PPE provided by or required by SLH
- Keep up to date with Health, Safety and Welfare policies, procedures and guidance as required by their supervisor or manager.
- Only use machinery/equipment for which they have been fully instructed and trained.
- Feel free to make suggestions to their Manager or any member of the Executive Management Team which may improve the Health, Safety and Welfare of employees or anyone affected by the work of SLH.
- Only use a mobile device whilst it is safe to do so and never whilst they are driving.
- Comply with COSHH regulations.
- Never work at height above three steps unless adequately trained in Working at Height.
- Comply with the Lone Working Policy, including the use of devices.

All contractors, sub-contractors and agency staff working indirectly on behalf of SLH.

All persons conducting work activity on behalf of SLH

- Will follow the agreed and contracted methods and procurement process – including checking Health and Safety Policies prior to contract appointment.
- Comply with the agreed safe systems of work and procedures at all times whilst at work and conduct themselves in such a manner so that they, or other people, are not put at risk by their activities.
- Co-operate with SLH Management on all matters affecting Health, Safety and Welfare at work.

- Report any hazards, defects, accidents, incidents and near misses that may affect health safety and wellbeing within their reporting structure and inform SLH, as soon as is reasonably practicable.
- Wear the necessary protective clothing and use the correct safety equipment and PPE required by legislation and best practice.
- Be competent and have in date and validated training and certification.
- Only use machinery/equipment for which they have been fully instructed, trained and certificated.

Head of People and Culture

The Head of People and Culture will identify and prioritise training and competency requirements and ensure that there is an appropriate budget for Health, Safety and Welfare training. The team is responsible for ensuring there is an up-to-date record of all staff training on health and safety. The Head of People and Culture will also ensure that there is a programme of health and wellbeing support for colleagues and systems in place to manage attendance.

4.3 Arrangements for Health and Safety

In order to promote a Health, Safety and Welfare culture that aims to produce high standards, the following arrangements are in place and tested by the four key stages (Plan, Do, Check Act)

Communication and Consultation

All SLH arrangements for Health, Safety & Welfare shall be effectively and continuously communicated to employees. Consultation and communication shall be through the Manager Forum and SLH Forums and Team Meetings/Toolbox Talks.

Supporting Information

SLH has a comprehensive suite of supporting; Policies, Policy Statements, Risk Assessments, Method Statements, Toolbox Talks, Staff Briefings, Safety Code of Conduct/Code of Working Practice and Working Processes.

Safety Training

Safety training forms an integral part of training within SLH. This is particularly important with induction training for new staff Managers should ensure this takes place.

The Health, Safety and Welfare training needs of employees should be the subject of periodic reviews by managers and supervisors and any necessary refresher training carried out.

All employees should have sufficient knowledge, skills, and information to carry out their work safely. The Head of People and Culture will consult with Managers to ensure an adequate annual training programme, also incorporating Safety Media e-learning packages.

Plan
· Determining your policy
· Planning for implementation
Do
· Profiling your health and safety risks
· Organising for health and safety
· Implementing your plan
Check
· Measuring performance
· Investigating accidents and incidents
Act
· Reviewing performance
· Learning lessons

Safety Management System

Our safety management system (SMS) is designed to manage safety risk in the workplace, occupational safety being defined as 'the reduction of risk to a level that is as low as is reasonably practicable (ALARP) to prevent people getting hurt'. A formal management system or framework helps us manage health and safety. Although the language and methodology are our own, the key actions can be traced back to Plan, Do, Check, Act.

Documentation

We intend to keep health and safety documents functional and concise, with the emphasis on their effectiveness rather than sheer volume of paperwork. Focusing too much on the formal documentation would distract us from addressing the human elements of its implementation.

Attitudes and Behaviours

Effectively managing for health and safety is not just about having a management or safety management system. The success of whatever process or system is in place still hinges on the attitudes and behaviours of people in the organisation (this is our 'safety culture').

Our SMS is a manual document system that is held on our intranet, it is maintained and updated by the H&S manager but is kept live with usage by managers and staff

Resources

Internal

The SLH Intranet and internal software applications support the SLH SMS and are accessible to all staff, this access is to be improved over the term of this policy version with the development of an access map. Risk management is the responsibility of Managers, Team Leaders and Service Heads and they are the first line of support. The H&S Manager and the HR Manager provide second line support and advice.

External

Ad hoc external Health and Safety support and advice is available from, HSE (the Health and Safety Executive), Local Authority Bodies. Additional support and guidance is available from specialist trade and regulatory bodies such as NICEIC and Gas Safe Register. SLH also procures external 3rd line of support from auditing service providers, and specialist consultancy services.

Health Monitoring

Health monitoring is an informal, non-statutory method of surveying our workforce for symptoms of ill health.

Health surveillance is not needed for most workers, but in some work situations where there is a specific reason to do it because of role profile and exposures then it is required by law. SLH will develop its monitoring process to the best practice standard of its sector in relation to the exposure its employees may experience,

exceeding the minimum statutory requirements, utilising external occupational health support as necessary.

Reporting of accident /incidents under RIDDOR Refer to Policy

Some types of accident/incident require reporting to the enforcing authorities. This decision should be made by a relevant (and available) senior manager and the Head of Governance & Risk (if available).

Accident/incident/near miss investigation

Unless the incident is trivial, all accidents, incidents or near misses shall have an appropriate level investigation and report (root cause analysis) conducted by the appropriate level manager of the relevant area. Adverse or causal conditions will be rectified, Policies and procedures will be updated, and briefings or training will be given to affected staff. This will help to ensure that the incident is not repeated.

Fire Prevention and Control

SLH manages fire prevention and control to at least the minimum standards required by legislation. These standards are implemented by the Building Safety Manager.

All arrangements for fire prevention and control are contained in the Fire, Legionella and Radon Policy Statement. This statement also establishes the FLR safety group that meet biennially.

Training in Fire Prevention and Control

Training sessions will be arranged for employees on fire prevention and control where appropriate.

Visitors and the Public

All reasonable action will be taken to ensure that visitors are accompanied in premises and properties owned or managed by SLH where risks are known to exist, or visitors are made aware of such risks by briefing or appropriate signage.

SLH will conduct its undertakings in such a way as to ensure that members of the public are not endangered by work carried out by its employees.

First Aid Service

SLH provides first aid services and facilities to at least the minimum standards required by legislation. These standards are monitored by the Business Improvement Directorate.

Arrangements for training in First Aid for employees shall be made through Human Resources. Details are contained in the Welfare, PPE, DSE, Noise and First Aid Policy Statement.

Safety Representatives and Safety Committees

SLH will consult with recognised trade unions and employee safety representatives on Health, Safety and Welfare issues through Safety Committees (the SLH Forum) and other meetings as appropriate.

Such consultation and negotiation should take place, where practicable, in good time and using existing procedures to ensure effective consultation on matters that affect the Health, Safety and Welfare of the employees they represent.

The SLH Forum is established to enable management and staff to bring matters of health, safety and welfare to each other's attention and to formally adopt a method of education and training. It monitors our safety performance and activities and promotes a 'Safety First' culture. It is time tabled to meet every eight weeks or more frequently if required.

Contractors on our premises or working on our behalf

All contractors are required to submit their Health, Safety and Welfare policies and documentation prior to being appointed on the approved contractors list.

All officers appointing contractors should ensure that the contractors' competency to carry out the appointed task has been checked.

All contractors are required to carry out a risk assessment of any significant hazards and this should be the subject of pre-contract and subsequent liaison.

On-site Communication - contract work involving occupied premises carries a dual responsibility. Employees organising such work should ensure there is effective liaison between the contractor and the custodians of any workplaces affected. All parties involved should understand their responsibilities in relation to health and safety.

Building 'Accountable Person' Responsibilities

The Accountable Person will need to conduct and maintain a safety case risk assessment for each building and appoint a 'Building Safety Manager' to oversee it day to day. 'Building Safety Managers' must inform contractors of any known Health, Safety and Welfare risks that they might encounter during the course of the work, along with any arrangements in force to reduce the risks, e.g. fire procedures for the building, asbestos data etc. Building safety managers must ensure that all works and activities conducted leave the building safe for people to live/work in.

Lone working

Managers and staff must comply with the Lone Working Policy and at least annually Managers shall review Risk Assessments and communicate these with their team.

Dynamic Health & Safety Risk Assessments

Dynamic risk assessments are the process of mentally observing, assessing and analysing the environment while we work, to identify and remove risks. The process allows individuals to identify a hazard on the spot and make quick decisions in regard to their own and other safety. This is used in emergency and business continuity situations but should be documented within a reasonable timescale of an incident e.g. next working day in most cases.

Help and Advice

Any employee can obtain help and advice on all aspects of occupational Health, Safety and Welfare from the Head of Governance & Risk

HandSAdvice@southlakeshousing.co.uk

4.3 Audit

External (3rd line of defence)

The Audit and Risk Committee approves an annual Audit plan which involves receiving assurance on Health Safety and Welfare compliance (three-year cycle) this is currently provided by BDO.

The Audit and Risk Committee monitors the implementation of Audit reports throughout the year and commissions an annual 'follow-up' review.

SLH will be subject to scrutiny by the Health and Safety Executive, the Building Safety Regulator and the Regulator for Social Housing.

SLH will also undergo audit scrutiny in order to achieve ISO standards.

4.4 Enforcement

External

The enforcement of health and safety legislation is split between the Health and Safety Executive (HSE) and local authorities (LA's).

In general, HSE covers factories, building sites, mines and quarries, farms, fairgrounds, railways, chemical plants and offshore and nuclear installations.

LA's cover offices, shops, warehouses, hotel and catering, sport, leisure, consumer services (e.g. launderettes, hairdressers, undertakers, shoe repair, tyre and exhaust fitters), residential care homes and churches.

In addition to providing published information and verbal advice, the enforcement methods available to HSE and LA inspectors include;

- ✓ providing written information regarding breaches of law,
- ✓ requiring improvements in the way risks are managed (application of an improvement notice),
- ✓ stopping certain activities where they create serious risks (application of a prohibition notice), and
- ✓ recommending and bringing, prosecutions where there has been a serious breach of law.

HSE and LA inspectors work to a single enforcement policy statement.

<http://www.hse.gov.uk/pubns/hse41.pdf>

Internal

The Actions SLH will take to ensure effective enforcement of this framework are to:

- ✓ Provide awareness/competence training to appropriate levels.

- Regularly audit performance and compliance through; established internal auditing process, auditing of documentary evidence and recording systems, shadowing or visiting of working processes by the Managers, Investigating incident/accident reports.
- Escalating, as appropriate, to senior/executive management any reported or observed breaches of policy expectations.

5. Monitoring & Review

Adherence to this framework will be monitored by the SLH Health & Safety Action Group of senior managers, reporting to the Executive Management Team. Implementation of colleague related actions is also monitored by the internal SLH Forum. Individual performance is assessed through the LEAP Together performance review process and specially via the behaviour's framework.

The Audit and Risk Committee monitoring of Health Safety and Welfare performance via a quarterly 'compliance' report, including a dashboard and a series of 'deep dives' into areas of compliance. The Audit and Risk Committee approves an annual Internal Audit Plan which involves receiving assurance on Health Safety and Welfare compliance. The Audit and Risk Committee also monitors the implementation of Internal Audit reports throughout the year and commissioning an annual 'follow-up' review.

The Board receives quarterly performance and risk reports, including exception reporting on Health & Safety. The Board also receives an Annual Health and Safety Report, from the Business Improvement Directorate.

This framework will be reviewed by the Audit & Risk Committee once per annum, in line with the 'terms of reference', ahead of approval by the Board. The framework may also be reviewed sooner where there is a need to address operational issues, or where best practice and wider learning has evolved or where there has been a recommendation arising from an audit.