



# **Health & Safety Policy**

**July 2024**

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## 1. Statement of Intent

SW9 Community Housing (SW9) is committed to continually improving the standards of health, safety and welfare that we provide not just to our employees and contractors but also to our residents and those who may be impacted by works carried out by ourselves or those acting on our behalf.

The Building Safety Act 2022, Fire Safety Act 2021, and the Fire Safety (England) Regulations 2022 introduced new requirements for building owners to assess and manage building safety risks in residential buildings. SW9 is committed to ensuring reasonable measures are taken to manage and reduce the risks of the spread of fire and structural failure, to prevent their occurrence and limit the impact should an incident occur.

SW9 Board, management and employees are committed to maintaining and where possible surpassing the benchmarks set by our peers within the Social Housing sector, and where possible we will share our best practice solutions.

SW9 will consider the Health and Safety at Work etc. Act 1974, The Building Safety Act 2022, and associated regulations to be the minimum acceptable standards when undertaking works and activities which impact on our employees and residents.

We recognise that our people are our most valuable asset, and as such, the highest standards of Health and Safety and employee welfare must be an integral part of our management performance plan. SW9 CH's Health and Safety policy applies to all of our workplaces and residential properties. Through strict adherence to our policies and procedures we aim to improve our performance and, where possible, the quality of life of our residents.

SW9 also accepts that while all staff within the organisation regardless of position have a direct responsibility for their own health and safety and that of their fellow colleagues, it is the responsibility of SW9's SLT and operational managers to ensure the activities and duties which are undertaken by SW9 staff are, as far as reasonably practicable, safe and healthy. This duty extends to ensuring residents and visitors should enjoy safe and healthy access to, and use of, all services and facilities provided by SW9.

To ensure the Health, Safety and welfare of its employees, contractors and other persons who may be affected by its activities, SW9 will, as far as reasonably practicable, provide and undertake the following:

- Provide plant, equipment and work procedures that are safe
- Provide a safe and healthy working environment and adequate welfare arrangements
- Provide clear and relevant information relating to health and safety for all employees
- Provide appropriate instruction, training and supervision which enable all employees to work safely and to carry out their duties and responsibilities under the Health and Safety policy

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- Establish effective consultation procedures which allow all employees to be involved in the development of health & safety policies/procedures and their implementation
- Provide adequate and appropriate resources to implement the policy, including the provision of competent health and safety advice and assistance
- Review our Health and Safety arrangements at least annually or as required following an event, to ensure that they remain relevant to the nature and scale of our work activities
- Encourage and operate a culture where employees can report hazards, accidents, incidents and learning events enabling appropriate additional measures to be put in place to prevent recurrence
- Maintain continual improvement through effective planning, organisation, control, monitoring and review of preventative and protective measure.
- Ensure the organisation's significant health and safety risks are identified, assessed, and that adequate control measures are established and maintained.
- Assess and manage occupied building safety risks through management of building information, engaging with residents, setting up and maintenance of residents' complaints procedure.
- Take whatever other measures may be necessary and practicable to ensure the health, safety and welfare of those who work for SW9, live in or visit its premises or are affected by its work activities.

SW9 encourages all employees to safeguard their own Health and Safety and that of others by adopting sensible precautions to minimise risks created by our work activities.

SW9's Health and Safety Policy refers to all of its offices, workplaces, and establishments.

Signed:



Delroy Rankin  
Executive Director

Signed: 22/05/2024

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## 2. SW9 Health and Safety Organisation

- 2.1 The Health and Safety policy applies to all employees of SW9. It also aims to ensure the safety and health of visitors to our premises including contractors and all persons who may be affected by our work activities.
- 2.2 This policy applies to all SW9 workplaces and SW9 properties which may be used as workplaces. It also applies to staff who are working from home or remotely from the office.
- 2.3 Health and safety of dwellings such as flats and houses managed by SW9 and occupied by tenants, is regulated by the Housing Act 2004, and is not covered by this policy.
- 2.4 Details of SW9's organisational arrangements for health and safety, including the responsibilities of specific posts, are included in the role profile for each role and are summarised below.
- 2.5 Minimum core health and safety competency requirements for each role are set out in each role risk assessment and for specific health and safety roles are also included in the respective role profiles.
- 2.6 SW9 is defined in law as the employer and therefore is the body that has overall responsibility for the Health and Safety policy and its implementation. The responsibility is discharged through the following organisational arrangements:
- 2.7 SW9 Board will:
- Approve SW9 Health and Safety Policy.
  - Ensure that all board decisions reflect its health and safety intentions, as articulated in this policy statement.
  - Undertake quarterly reviews of the organisation's health and safety performance through the Board and Finance Risk and Audit Committee.
  - Perform its collective role in providing health and safety leadership in SW9.
  - Seek competent health and safety advice and assistance, as necessary.
  - Ensure that Board members are competent in their health and safety responsibilities.
  - Ensure that employees are consulted properly on health and safety matters and that employee concerns are reaching the appropriate level.
  - Seek assurance that the organisation's significant health and safety risks are controlled.
  - Empower the Board and subcommittees to scrutinise the health and safety performance of the business in respect of the scope of the Committee and to report their findings to the Board.

### 2.8 The Executive Director will:

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- Have overall responsibility for the implementation of SW9 Health and Safety policy.
- Sign the SW9 Health and Safety policy statement to demonstrate commitment at the highest level.
- Promote a positive health and safety culture across SW9 and ensure that health and safety is ranked with equal importance to other management responsibilities.
- Ensure that adequate and competent health and safety advice and assistance is readily available to all employees.
- Receive any exceptional reports on urgent or critical health and safety issues requiring an executive decision.
- Approve budgets which include sufficient resources to enable health and safety risks to be controlled.
- Receive monthly and quarterly building and health & safety performance reports; health and safety consideration is a standing item on all leadership meetings.

**2.9 The Head of Customer Services will:**

- Discharge the functions delegated by the Executive Director and serve as the organisation’s “named” Health and Safety Officer as appropriate
- Exercise overall control to ensure compliance with health and safety legislation and SW9 policy. In particular will ensure that the following actions are carried out:
- Develop strategies for promoting a health and safety culture e.g. by integrating the management of health and safety into general organisational management practices
- Provide sufficient resources to fulfil the health and safety responsibilities of each service area
- Arrange the provision of competent health and safety advice and assistance appropriate to the size and complexity of SW9
- Arrange for a suitable and sufficient assessment to be made of the risks to the health and safety of employees and others who may be affected by the work of SW9 service areas. Ensure this assessment is documented and an action plan is produced to ensure any unacceptable risks are removed
- Arrange representation of SW9 and its employees at relevant Health and Safety panels.
- Arrange for systems of work to be developed which are safe and which include a description of the task, safe working procedures.
- Accept reports from officers on health and safety matters relating to SW9 operations
- Undertakes responsibility for reporting accidents and violent incidents/assaults

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to the SW9 Senior Leadership Team, who in turn will report in accordance with the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013

- Raise any potentially serious unresolved/on-going health & safety issues with the Executive Director or their delegated representative
- Coordinate health & safety training with Business Support and Human Resources
- Ensure that contractors produce method statements, risk assessments and are adequately supervised to look out for mutual health and safety concerns.

#### **2.10 The Head of Corporate Services will:**

- Discharge the functions delegated by the Executive Director.
- Motivate managers to discharge their health and safety responsibilities and maintain a record of the arrangements.
- Ensure new installations, workstations, equipment, and substances are assessed for health and safety compliance before they are purchased, installed or brought into use.
- Support the Head of Customer Services in arranging systems of work to be developed which are safe and which include a description of the task, safe working procedures, maintenance procedures, information on hazards and emergency procedures.
- Raise any potentially serious unresolved/on-going health and safety issues with the Executive Director or their delegated representative.
- Update the health and safety management system. This will include safe working procedures, systems for assessing and controlling risks and for monitoring health and safety performance e.g. health and safety inspections.
- Provide information to facilitate the participation in, and scrutiny of SW9's Health and Safety policy.
- Produce quarterly reports on health and safety compliance and provide these to the relevant boards and panels.
- Carry out monitoring and auditing as necessary to ensure that inspections, risk assessments etc. are being carried out consistently across SW9.
- Advise on the implementation of new health and safety legislation, enhancing working practices.

#### **2.11 The Director of Finance and Resources will:**

- Discharge the functions delegated by the Executive Director.
- Motivate managers to discharge their health and safety responsibilities and maintain a record of the arrangements.

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- Provide sufficient resources to fulfil the health and safety responsibilities of each service area.
- Support the appropriate Head of Service/Head of Customer Services in arranging for systems of work to be developed which are safe and which include a description of the task, safe working procedures, maintenance procedures, information on hazards and emergency procedures.
- Budget for the provision of competent health and safety advice and assistance appropriate to the size and complexity of SW9.
- Raise any potentially serious unresolved/on-going health & safety issues with the Executive Director or their delegated representative.

### **2.12 Operational Managers will:**

- Ensure SW9's health and safety policy is implemented within their service area. Implementation will include clearly defined health and safety arrangements and responsibilities of all levels of staff.
- Ensure that there are adequate and effective arrangements in place for consulting all employees within their service areas on matters that affect their health and safety. These should include health & safety as a standing item in one-to-one meetings.
- Promote a positive health and safety culture within their service areas.
- Monitor the area's health and safety performance e.g. by arranging regular workplace health and safety inspections, ensuring workstation assessments and risk assessments are conducted, regularly reviewed and forwarded to the Senior Leadership Team (SLT).
- Ensure that incidents causing injury to employees or other persons, violent incidents, and other incidents where injury could have occurred are reported to the accident and incident report form. Managers reporting to Heads of Service are also responsible for conducting an initial investigation to ensure that the area has been made safe and precautions are in place to control risk. The outcome of this investigation should be recorded on the incident report. They should identify any defects and make recommendations for any necessary remedial action.
- Receive/produce any exceptional reports on any urgent health and safety issues.
- Allocate sufficient resources to fulfil their service area's health and safety responsibilities.
- Be responsible for employees and activities under their control and will ensure that the requirements of SW9 health and safety policy are complied with. In particular, they will, where appropriate, undertake suitable and sufficient risk assessments and ensure that adequate measures are taken to minimise the health and safety risks to the employees under their control and to any other persons who may be affected by work carried out by these employees.
- Ensure action is taken to resolve any situations that may adversely affect the

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health and safety of employees or other persons. When possible, rectify any problem within their own resources or see it is raised with SW9's senior management, and the Sovereign Network Group Health and Safety panel as appropriate.

- Ensure that all employees under their control are given adequate information, instruction, training and supervision to carry out their duties safely and competently, paying particular attention to new/inexperienced employees and trainees.
- Ensure that all staff - particularly new staff - are familiar with the fire and evacuation procedures and the arrangements for first aid.
- Maintain records of the training undertaken by the employees who report directly to them and ensure that the human resources team is also given details.
- Ensure all work equipment, such as People Safe Lone Worker device, is suitable, properly maintained, and has undergone necessary testing and assessments.
- Develop safe systems of work and support their implementation and management.
- Monitor the usage of lone working devices by team members.
- Ensure contractors they manage are assessed for health and safety competence during the procurement process and once employed, are made aware by SW9 of their health and safety responsibilities, duties and liabilities.

### **2.13 Employees will:**

- Take reasonable care for the health and safety of themselves and for those other persons who may be affected by their acts or omissions.
- Report accidents, incidents and near misses with the potential for injury or damage to their line manager immediately.
- Report any incidents of abusive/threatening behaviour or actual physical violence immediately to their line manager and complete the accident and incident report form.
- Report hazardous situations, defects found in workplaces, plant and equipment etc. to their line manager immediately.
- Attend health & safety training, as necessary.
- Use equipment, safety systems and safe systems of work provided, e.g. workstation assessment system, lone worker safety system, or personal protective equipment, safely in accordance with the training and instruction that they have been given. This includes not using equipment they have not been authorised or trained to use.
- Report loss of, or damage to, their personal protective equipment.
- Exercise reasonable standards of housekeeping and hygiene.

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- Co-operate with their managers and colleagues in matters relating to SW9's Health and Safety policy and procedures.

### 2.14 All employees if they do not meet their responsibilities

In accordance with SW9's Code of Conduct, any breach or failure to adhere to this policy or procedure will be considered grounds for invoking SW9's disciplinary procedures, the penalty for which could include dismissal. Anyone found to have committed a crime will face both disciplinary and criminal action.

### 2.15 SW9 Occupational Health Contractors will:

Provide the contracted service including advice on medical and health assessments, risk assessment advice, health promotion events, and similar services.

### 2.16 Other officers with special responsibilities

The implementation of SW9's Health and Safety Policy depends on the contribution of all staff and contractors. In particular, the following appointed persons assist with the implementation:

- First Aiders
- Fire Wardens who have a number of other functions (set out on the Safety Representatives & Safety Committee Regulations) which they are entitled by law to exercise.

## 3. Arrangements

3.1 Part three of the policy statement contains our implementation strategy and management arrangements. Detailed arrangements for the control of specific health and safety risks are published on Apollo. This section of the policy also includes a few detailed arrangements that are more efficiently organised on a central SW9-wide basis and are therefore included in the policy statement.

### 3.2 Implementation Strategy

- The delivery of the SW9 policy is through all operational teams. All teams will put in place arrangements for the management of health and safety risks based on its risk assessment(s) and the SW9 health and safety policy, procedures and guidance. These are made available to all employees on the shared computer drive and on Apollo.
- SW9 is committed to service improvement and this means achieving and promoting high standards of health and safety practices for our residents and employees and maximising opportunities to create a work environment where we embed the SW9's health and safety responsibilities into everything we do through the promotion of a health and safety culture.
- SW9 supports SNG in its response to the Grenfell Tower enquiry. SW9 have responded to the lessons learned from the Grenfell Tower enquiries and alongside SNG is complying with the Building Safety Act 2022, Fire Safety Act, and associated regulations.

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### 3.3 Communicating Effectively

- The SW9 strategy is designed to ensure that risk is managed and that those responsible for services that create risks manage them responsibly.
- This requires open, transparent and inclusive communications with our wide range of stakeholders. We strongly encourage productive dialogues to help improve the quality of our decision making along with higher levels of recognition and responsibility for health and safety.
- We will champion sensible health and safety controls that are sensibly applied. This message is for everyone and we will make it clear in our communications that effective health and safety management is a collective responsibility in which individuals too must play their part.

### 3.4 Performance Measuring and Monitoring

- Progress in respect of the implementation of the Health and Safety Policy will be reported quarterly to the Board and SLT by the responsible officer.
- Targets and key performance indicators will be set and agreed by the SW9 SLT for key health and safety objectives and will be measured via performance management systems. Performance data for improvement initiatives such as use of the lone worker system and workstation risk assessments will be reported to the appropriate committee by the SLT. SW9 SLT will then plan and implement necessary improvement or remedial action.
- SW9 will take part in quality management processes such as the Annual Playground technical inspection which will be used to check that routine inspections of all workplaces and common parts of our stock ensure that the preventative and protective measures are in place and effective.
- SW9 incidents and accidents will be investigated to ascertain underlying as well as immediate causes and to ensure that remedial action is taken, lessons are learnt, trends are identified and accident prevention programmes are formulated where appropriate. The Senior Leadership Team will maintain an overview of incident trends and will arrange improvement or remedial action where appropriate.

### 3.5 Audit

Internal audits of the health and safety management system will be conducted by SW9 at planned intervals to assess the effectiveness of the implementation of the health and safety policy and standards across SW9 and to provide information on the results of audits to the Senior Leadership Team. Audit programmes will be planned and managed based on the results of risk assessments of SW9's activities and the results of previous audits. Internal Audit and Risk will monitor at high level the implementation of audit recommendations at SW9 and provide an additional health and safety assurance function.

### 3.6 Occupational Health

SW9 contracts with Occupational Health contractors to provide occupational health services such as fitness to work assessments and rehabilitation programmes. Referrals are made by HR and employees are directed to the provider that is most appropriate.

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### 3.7 Change Management

SW9 is committed to assessing health and safety risk during the planning process of organisational changes. The Board and its Sub Committees will have a standing item on their agendas to prompt members to consider the health and safety implications of organisational change currently being planned.

### 3.8 Visitor Safety

SW9 is committed to ensuring the health & safety of everyone who attends our premises. For purposes of safety and security it will be the responsibility of the employee receiving the visitor to accompany them at all times, as far as is reasonably practicable, and to ensure their safety, for example in the event of a fire incident or drill.

### 3.9 Review

The SW9 management shall review the organisation's health and safety management system at least annually to ensure its continuing suitability, adequacy and effectiveness. Input to reviews will include those recommended in best practice guidance e.g. audit results, consultation results, and performance data. Relevant outputs from management review will be made available for communication and consultation.

### 3.10 Noise at Work

- SW9's policy is to avoid the exposure of any employees to noise levels of 80 dB (A) or more. Through display screen assessments, other risk assessments, performance management reviews and 121s employees are requested to report to their line manager any incidents or work environments where they need to raise their voices to make themselves heard against background noise. Line managers should report any such incidents or unsafe conditions to the Heads of Service to arrange an independent noise survey. Line managers should also take steps to reduce unnecessary excessive noise at work at levels which are unlikely to damage hearing but if prolonged and uncontrolled could contribute to a stressful working environment.
- The Control of Noise at Work Regulations 2005 require that any working environment where exposure levels exceed 80 dB (A) must have a noise assessment carried out and the details recorded. If the noise levels are 85 dB (A) and over, efforts must be made to reduce the noise at source. If this is not possible ear protection must be worn.

### 3.11 DSE

In compliance with the requirement of the Health and Safety (Display Screen Equipment) Regulations 1992 as amended by the Health & Safety (Miscellaneous Amendments) Regulations 2002, employees who are "users" of display screen equipment have a legal right to an eye and eyesight test, on request. Full details are provided in the SW9o Eye test policy.

### 3.12 No Smoking

SW9 is committed to discharging our corporate duty, in relation to places under our ownership or control, not to permit smoking in enclosed public places or in other places where it could be harmful to the health or safety of residents or employees. Further, smoking by employees or other users of our buildings is not tolerated where it could cause a nuisance to building users e.g. at the entrances to our offices. It is not the policy of the SW9 to attempt to ban smoking in residents' dwellings.

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### 3.13 Well-being

- SW9 have a comprehensive package of employee benefits which incorporate health and wellbeing benefits e.g. Employee Assistance Programme and our employee benefit platform, Medicash. Staff also have access to several pay benefits and loans, such as the Financial Hardship Loan, free eye tests and Welfare Loan. SW9 also hold sessions regarding welfare, covering topics such as mental health. Details are communicated to new employees during induction.

## 4. Related Documents

- Fire Safety Policy
- Gas Safety Policy
- Control of Asbestos Policy
- Electrical Safety Policy
- Water Hygiene Policy
- Board Assurance Framework

## 5. Legislation and regulation

Relevant legislation includes, but is not limited to:

- Health and Safety at Work etc. Act (1974)
- Management of Health and Safety at Work Regulations (1999)
- Workplace (health, safety and welfare) Regulations (1992)
- Health and Safety (DSE) Regulations (1992)
- Personal Protective Equipment at Work Regulations (1992)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (1995)
- Social Housing (Regulation) Act (2023)
- Building Safety Act (2022)
- Fire Safety Act (2021)

## 6. Equality and diversity

We will apply this policy consistently and fairly and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010.

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<b>Policy author:</b>	<b>Head of Corporate Services</b>	
<b>Policy owner:</b>	<b>Executive Director</b>	
<b>Adopted from Network Homes: y/n</b>	<b>Yes</b>	
<b>Review schedule (1, 2 or 3 years):</b>	<b>1 year</b>	
<b>Equality Impact Assessment (EIA)</b>	<b>Date completed</b>	
	<b>Initial or full EIA</b>	

**Change Record**

<b>Date</b>	<b>Reviewed by (name and title)</b>	<b>Version</b>	<b>Summary of changes</b>
May 2024	SLT		Annual Review