

HEALTH & SAFETY POLICY

2019

FULL REVIEW TRACKING

A “Full Review” refers to a point when the whole document is reconsidered by appropriate stakeholder to establish if it is still fit for purpose and this is formally signed-off at the appropriate management level. This acts as assurance that the Association’s position on key matters is up to date with legislation, regulation and good practice.

Policy Owner	Director of Finance & Corporate Services
Document Author(s)	Corporate Services Manager
Communication & Training Methods	LaW Responsibilities: Awareness sessions with LT/OMT/Board LaW H&S responsibilities: briefing for all staff CONNECT
Approved By	POLHA Board
Review Cycle	5 years
Next Review Date	January 2024
Next Law at Work Audit	March 2019
The Policy has a direct link to the following PoLHA policies and procedures	See Page 4 of policy Disciplinary Policy and Procedures
This policy complies with the requirements of these legal and/or regulatory documents	Construction (Design and Management) Regulations (CDM) 2015
Equality & Diversity Impact (EI) Assessment Status	This document was EDI Assessed by Glen White, Corporate Services Manager using the organisation’s set procedure in January 2019 and is considered to be free of anything which may lead to any unfair discrimination in its application. EI Assessment records are held by the Chief Executive’s Office and can be accessed on request to the Head of Corporate Services.

REVISION TRACKING

Revisions are minor changes which are made between Full Reviews which might be needed because of new ideas or changes

Revision Date	Part of doc revised	Reason for revision	Approved by

**PORT OF LEITH HOUSING ASSOCIATION
HEALTH AND SAFETY POLICY AND ARRANGEMENTS**

CONTENTS

Title	Version	Date
Health and Safety Policy	V1.0	Feb 2018
Safety Arrangements		
1.1 Accident Reporting and Investigation	V1.0	May 2017
1.2 Contractors (Detailed in 2.17 CDM Procedures)	V1.0	May 2017
1.3 Communication and Consultation	V1.0	May 2017
1.4 Fire Safety	V1.0	May 2017
1.5 First Aid	V1.0	May 2017
1.6 Risk Assessment	V1.0	May 2017
1.7 New and Expectant Mothers	V1.0	May 2017
1.8 Young Persons	V1.0	May 2017
2.1 Asbestos	V1.0	May 2017
2.2 Driving at Work	V1.0	May 2017
2.3 Display Screen Equipment	V1.0	May 2017
2.4 Electricity	V1.0	May 2017
2.5 Control of Substances Hazardous to Health	V1.0	May 2017
2.6 Legionella	V1.0	May 2017
2.7 Lifting Operations and Lifting Equipment	V1.0	May 2017
2.8 Lone Working	V1.0	May 2017
2.9 Manual Handling	V1.0	May 2017
2.10 Personal Protective Equipment	V1.0	May 2017
2.11 Provision and Use of Work Equipment	V1.0	May 2017
2.12 Work Related Stress	V1.0	May 2017
2.13 Violence at Work	V1.0	May 2017
2.14 Work at Height	V1.0	May 2017
2.15 Workplace	V1.0	May 2017
2.16 Infection Control	V1.0	<i>In preparation</i>
2.17 Health and Safety on Site and CDM (Client) Procedures	V1.0	Oct 2017

[page left intentionally blank]

General Statement of Health and Safety Policy

The **Board of Management** recognises the importance of providing strong leadership to ensure a robust culture for health and safety is secured and implemented at all levels of our organisation.

The **Chief Executive Officer (CEO)** has lead responsibility for health and safety, ensuring that the Association's policy is regularly reviewed, that resources are made available and that decisions are made that ensure health and safety compliance is a fundamental requirement of our business.


The **Association**, so far as is reasonably practicable, will ensure that:


- The working environment of all employees is safe and without risks to health and that adequate provisions are made with regard to the facilities and arrangements for their welfare at work.
- The provision and maintenance of machinery, equipment and systems of work which are safe and without risks to health to employees, contractors and any other person who may be affected with regard to any premises or operations under our control.
- Arrangements for use, handling, storage and transport of articles and substances for use at work that are safe and without risks to health.
- Adequate information is available with respect to machinery and substances used at work detailing the conditions and precautions necessary to ensure that when properly used they will be safe and without risk to health.
- Employees are provided with such information, instruction, training and supervision as is necessary to secure their health and safety.
- The Health and Safety Policy will be reviewed annually. Communication of any such changes will be made to all employees.

It shall be the duty of all **employees** at work to ensure:

- That reasonable steps are taken to safeguard the health and safety of themselves and of other persons who may be affected by their acts or omissions at work.
- Co-operation with the Board of Management, so far as is necessary, to ensure compliance with any duty or requirement imposed on the employer, or any other person, under any relevant statutory duties.

Where self-employed persons or contractors and their employees carry out work on group premises, they must comply with the standards of safe working contained in any regulations or codes of practice applicable to their operations, and in the Association's safety rules.

Signature:  (Chair) Date: 31 January 2019

Signature:  (Chief Executive) Date: 31 January 2019

[page left intentionally blank]

1. ORGANISATION

Port of Leith Housing Association recognises that all individuals within the organisation have a responsibility to ensure their own safety and that of others. Consequently, all employees will have the potential to be held liable if their negligent acts or omissions result in harm being caused to any other persons.

The following section set out the principal Health and Safety related responsibilities of individuals within the organisation.

The rather unique management structure of Housing Associations differs from the traditional business organisation where a Board of Management, Owner/Manager or Leadership Team clearly runs the undertaking. Care has, therefore, been taken to determine realistic responsibilities of the Board of Management and Chief Executive Officer in particular.

The management responsibilities defined within this Policy should ensure that adequate and appropriate managerial control is exercised over Health and Safety issues.

2.1 Health and Safety Responsibilities

2.1.1 Board of Management

The Board of Port of Leith Housing Association has overall responsibility for ensuring that suitable procedures for effective risk-management and compliance with legislation are established, implemented and monitored throughout the Association. Its members will ensure, as far as is reasonably practicable, the health and safety of all employees and any other persons who may be directly affected by the activities of the Association. The CEO is, by position, the lead person for health and safety.

2.1.2 Chief Executive Officer (CEO) has primary responsibility for:

Ensuring that the Association's Health and Safety Policy is in place and implemented;

Ensuring that adequate resources are allocated to safeguard the health and safety of staff, service users and visitors; and

Informing the Leadership Team and the whole Board of any serious accident or incident and of any intended prosecution, improvement or prohibition notice issued by an Inspector of the HSE as soon as practicable.

The CEO has delegated authority for the day to day operation of the Association's Health and Safety policy to a designated Competent Person and other senior officers within the Association.

2.1.3 The Director of Finance and Corporate Services is the designated 'competent person' for general health and safety arrangements and responsible for:

- Ensuring that the Association's Health and Safety Policy is reviewed, in place and implemented;
- Ensuring that adequate resources are allocated to safeguard the health and

safety of staff, service users and visitors;

- ensuring that the CEO, as the Board's representative and Leadership Team, is informed as soon as possible of any serious accident or incident and of any intended prosecution, improvement or prohibition notice issued by an Inspector of the Health & Safety Executive, Environmental Health Officer or Fire Safety Enforcement Officer.

2.1.4 The **Leadership Team**, as part of its remit:

- Considers and ratifies amendments to policy and procedures as proposed by the Director of Finance and Corporate Services, and
- Determines the strategic direction of health and safety policy, agrees and reviews key performance indicators (KPIs) and provides guidance and direction on the appropriate action to be taken in relation to the analysis of accident and incident data.

2.1.5 The **Operational Management Team**, as part of its remit, ensures:

- That adequate resources are arranged to ensure the effective implementation of the Association's Health and Safety policy in areas of responsibility.
- The effective management and implementation of this policy and related procedures, compliance with the relevant safety requirements of the Health and Safety at Work Act, and any other relevant legislation.
- The Association's Health and Safety Policy and its scope of responsibility is brought to the notice of all employees within their area of responsibility.
- That governance requirements are addressed within their section.

2.1.6 The **Director of Property & New Business** is the designated 'competent person' for Construction Design Management health and safety arrangements and is responsible for:

- Ensuring that adequate resources are arranged to ensure the effective implementation of the Association's Health and Safety policy in areas of responsibility.
- The effective management and implementation of this policy and related procedures, compliance with the relevant safety requirements of the Health and Safety at Work Act, Fire Safety Regulations, CDM Regulations and any other relevant legislation.
- Ensuring that the Association's Health and Safety Policy and its scope of responsibility is brought to the notice of all employees within their area of responsibility.

2.1.7 The **Sheltered Housing Services Manager** is responsible for the day to day management of Health & Safety within the Sheltered Housing section of the Association and is required to:

- Carry out building checks on all properties within the responsibility of the Sheltered Housing Services section of the Association to ensure best compliance with

current Health & Safety and Fire Safety legislation and guidelines and with PoLHA safety policies and procedures;

- Promote and maintain the development of Health and Safety culture with all staff employed in the Sheltered Housing Services section and the promotion of a robust health and safety culture;
- Monitor the activities of all staff employed or coming under the responsibility of the Sheltered Housing section, to ensure compliance with Health & Safety legislation and guidance and with PoLHA safety policies and procedures;
- Monitor reviews of health and safety audits and ensure that recommendations pertinent to the Sheltered Housing Services section of the Association are actioned appropriately and in accordance with the audit action plan;
- Identify and organise delivery of section staff health and safety training needs;
- Ensure that the Director of Finance and Corporate Services is informed immediately of any serious incident or breach of Health & Safety legislation, guidelines or PoLHA H&S policy.
- Care Inspectorate Reporting: In the case of accidents within the Sheltered Housing developments it is the responsibility of the Sheltered Housing Manager (or deputy) to report this to Housing Manager.

2.1.8 The **Housing Manager** is responsible for:

- In the cases of accidents within the Sheltered Housing developments the Housing Manager will make the report to the Care Inspectorate within 24 hours of the accident occurring. The Director of Finance & Corporate Services should also be informed of the accident.

2.1.9 The **Development Manager** is responsible for:

- The effective management and implementation of this policy and related procedures, and compliance with the relevant safety requirements of the Health and Safety at Work Act, Fire Safety Regulations, CDM Regulations and any other relevant legislation.
- Ensuring the communication, implementation and delivery of the Association's Health and Safety policy and procedures within their area of responsibility, as far as practicable, and ensuring that adequate resources are available for this.
- Ensuring that the implementation and compliance with the Association's health and safety policy is monitored, reviewed and reported.
- Ensuring that all staff within area of responsibility receive suitable training in health and safety and in safe working practices and are appropriately resourced and monitored before commencement of duties and that training is kept up to date. This includes ensuring that all staff within area of responsibility hold an up to date Construction Skills Certification Scheme card.
- Ensuring that the Association's Health and Safety Policy and its scope of responsibility is brought to the notice of all employees within their area of responsibility.
- Ensuring that any governance requirements are addressed within their section.
- Ensuring compliance, by staff and contractors, with all health and safety requirements relating to new build and that all necessary risk assessments, method statements and CDM client checklists are in place and suitable, where relevant.

- Ensuring that staff report any near misses and that details are communicated to the Director of Finance and Corporate Services for consideration of potential additional control measures.
- Ensuring that all critical incidents or unsatisfactory outcomes of health and safety inspections and audits are reported to the Director of Finance and of Corporate Services at agreed intervals.
- Ensuring that the Director of Finance and Corporate Services is informed as soon as possible of any intended prosecution or enforcement notice issued by an Inspector of the HSE, Environmental Health Officer or Fire Safety Officer.
- Ensuring that health and safety reports and audit results are provided to the Director of Finance and Corporate Services at agreed intervals.
- Maintaining their own personal competency levels, knowledge and skills relevant to their role and responsibilities.
- Ensuring that appropriate information, instruction and training is delivered to all levels of staff within their area and that training records are maintained.

2.1.10 The **Maintenance Manager** is responsible for:

- The effective management and implementation of this policy and related procedures, and compliance with the relevant safety requirements of the Health and Safety at Work Act, Fire Safety Regulations, CDM Regulations and any other relevant legislation.
- Ensuring the communication, implementation and delivery of the Association's Health and Safety policy and procedures within their area of responsibility, as far as practicable, and ensuring that adequate resources are available for this.
- Ensuring that the implementation and compliance with the Association's health and safety policy is monitored, reviewed and reported.
- Ensuring that all staff within area of responsibility receive suitable training in health and safety and in safe working practices and are appropriately resourced and monitored before commencement of duties and that training is kept up to date. This includes ensuring that all staff within area of responsibility hold an up to date Construction Skills Certification Scheme card.
- Ensuring that any governance requirements are addressed within their section.
- Ensuring compliance, by staff and contractors, with all health and safety requirements relating to building services and maintenance and that all necessary risk assessments, method statements and CDM client checklists are in place and suitable, where relevant.
- Ensuring that staff report any near misses and that details are communicated to the Director of Finance and Corporate Services for consideration of potential additional control measures.
- Ensuring that all critical incidents or unsatisfactory outcomes of health and safety inspections and audits are reported to the Director of Finance and of Corporate Services at agreed intervals.
- Ensuring that the Director of Finance and Corporate Services is informed as soon as possible of any intended prosecution or enforcement notice issued by an Inspector of the HSE, Environmental Health Officer or Fire Safety Officer.

- Ensuring that health and safety reports and audit results are provided to the Director of Finance and Corporate Services at agreed intervals.
- Maintaining own personal competence levels, knowledge and skills relevant to their roles and responsibilities.
- Ensuring that appropriate information, instruction and training is delivered to all levels of staff within their area and that training records are maintained.
- Ensuring that all tools, apparatus, appliances and other equipment necessary for safe working are provided and that all such equipment is used in accordance with manufacturer's instructions.
- Ensuring that all work equipment is inspected and maintained in accordance with relevant legislation and guidelines.
- Ensuring that all mandatory checks and inspections are carried out timeously by qualified contractors or trained, competent staff.
- Ensuring that staff using equipment, tools and apparatus etc. have been formally trained in the safe use of the equipment and that this training is recorded.

2.1.11 The **Asset & Procurement Manager** is responsible for:

- The effective management and implementation of this policy and related procedures, and compliance with the relevant safety requirements of the Health and Safety at Work Act, Fire Safety Regulations, CDM Regulations and any other relevant legislation.
- Ensuring the communication, implementation and delivery of the Association's Health and Safety policy and procedures within their area of responsibility, as far as practicable, and ensuring that adequate resources are available for this.
- Ensuring that the implementation and compliance with the Association's health and safety policy is monitored, reviewed and reported.
- Ensuring that all staff within area of responsibility receive suitable training in health and safety and in safe working practices and are appropriately resourced and monitored before commencement of duties and that training is kept up to date. This includes ensuring that all staff within area of responsibility hold an up to date Construction Skills Certification Scheme card.
- Ensuring that any governance requirements are addressed within their section.
- Ensuring compliance, by staff and contractors, with all health and safety requirements relating to asset management and that all necessary risk assessments, method statements and CDM client checklists are in place and suitable, where relevant.
- Ensuring that staff report any near misses and that details are communicated to the Director of Finance and Corporate Services for consideration of potential additional control measures.
- Ensuring that all critical incidents or unsatisfactory outcomes of health and safety inspections and audits are reported to the Director of Finance and of Corporate Services at agreed intervals.
- Ensuring that the Director of Finance and Corporate Services is informed as soon as possible of any intended prosecution or enforcement notice issued by an Inspector of the HSE, Environmental Health Officer or Fire Safety Officer.
- Ensuring that health and safety reports and audit results are provided to the Director of Finance and Corporate Services at agreed intervals.

- Maintaining own personal competence levels, knowledge and skills relevant to their roles and responsibilities.
- Ensuring that appropriate information, instruction and training is delivered to all levels of staff within their area and that training records are maintained.
- Ensuring that health and safety and fire safety audits are carried out on all the Association's potential assets prior to purchase, acquisition, adoption etc. to establish safe working practices.
- Ensuring that arrangements are made for all mandatory safety inspections to be carried out timeously and effectively, e.g. LOLER, Electrical Safety, Gas Safety etc.
- Ensuring that regular health and safety and fire safety audits are carried out at regular intervals, as determined by the Director of Finance and Corporate Services.
- Undertaking thorough investigations into safety related, property based issues and support the Maintenance Manager by identifying problem areas and make recommendations.

2.1.12 Employability Services Manager is responsible for:

- Ensuring department compliance with all relevant health and safety legislation and Association's safety policies and procedures.
- Ensuring that appropriate information, instruction and training is delivered to all levels of staff within their area of responsibility and that training records are maintained.
- Ensuring the execution and evaluation of agreed solutions identified following internal and external safety inspections.
- Ensuring that suitable and sufficient risk assessments are carried out on all tasks undertaken by staff and that suitable control measures are implemented and monitored.
- Ensuring regular and effective communication with safety inspection teams.

2.1.13 Corporate Services Manager is responsible for:

- Providing support to the Director of Finance and Corporate Services in all matters relating to Health and Safety.
- Developing and maintaining, in liaison with the Director of Finance and Corporate Services, a robust health and safety management system including working on the development of policies and procedures to ensure compliance with health and safety legislation and good practice.
- Providing, or arranging for, the provision of advice, guidance and support to managers and staff to ensure health and safety risks are effectively managed throughout the organisation.
- Co-ordinating the maintenance, communication and execution tracking of the Association's corporate health and safety action plan(s).

2.1.14 Senior Technical Officer is responsible for:

- Providing support to the Development Manager in all matters relating to health and safety in the relevant sections of the Association's property portfolio.

- Where required, fulfil the client role on behalf of the Association in accordance with the Construction Design and Management Regulations.
- Ensuring contractor compliance with all current health and safety legislation and guidelines and with relevant Association policies and procedures.
- Inspecting and assessing the standard of the health and safety related works, performed by contractors, in all relevant properties and reporting any safety concerns to line management.
- Ensuring good health and safety practice is followed in all areas of responsibility.
- Ensuring continuous professional development in health and safety legislation and practice.

2.1.15 Senior Maintenance Officer is responsible for:

- Providing support to the Maintenance Manager in all health and safety matters relating to property maintenance in the Association's property portfolio and any other area included in their role.
- Maintaining their health and safety competence levels, knowledge and skills relevant to their roles and responsibilities.
- Ensuring that the Maintenance Manager is informed of all serious incidents relating to property, plant and equipment etc.
- Maintaining their competency levels, knowledge and skills relevant to their role and responsibilities.

2.1.16 Facilities Team Leader is responsible for:

- Providing support to the Maintenance Manager in all health and safety matters relevant to property maintenance in the Association's property portfolio and any other areas included in their role.
- Ensuring that all maintenance works carried out under their responsibility are carried out safely and within full compliance with health and safety legislation and the Association's safety policies.
- Ensuring that the Maintenance Manager is informed immediately of any significant breaches of safety policies or legislation or where a previously unrecorded hazard has been identified.
- Ensuring that the Maintenance Manager is informed of all serious incidents relating to property, plant and equipment etc.
- Ensuring that all plant and equipment is safely maintained and used in accordance with training and manufacturer's instructions.
- Ensuring that tools, plant and other equipment is only used by staff trained in the use.
- Maintaining their competency levels, knowledge and skills relevant to their role and responsibilities.

2.1.17 Employees are responsible for:

While the overall responsibility for health and safety rests at management level, all employees have a responsibility for adhering to and carrying out this policy. It is the legal duty of all

employees whilst at work:

- To take reasonable care for the health and safety of themselves and other persons who may be affected by the way in which they carry out their work.
- To co-operate with management and supervisory staff to enable them to carry out health and safety duties.
- To report to management and supervisory staff any observations of situations, working practices or procedures which they may suspect are potentially hazardous or present a risk to health.
- To report all accident, dangerous occurrences or near misses to management.
- To use all protective clothing, equipment and materials provided for them by the group. Employees have the personal responsibility not to interfere with, misuse or misappropriate safety equipment.
- To comply with all health and safety instructions, both verbal and written.
- To use machinery, plant or equipment only following appropriate training or instruction, and with the appropriate guards or safety devices in position as detailed in the manufacturer's instructions.
- To maintain competency levels, knowledge and skills relevant to their role and responsibilities.

3. Planning and Implementation

3.1 Health and Safety Arrangements

This policy is accompanied by a series of health and safety arrangements covering the full range of health and safety issues relevant to the operation of the Association as listed in the contents.

3.2 Communication and Consultation

Port of Leith Housing Association will ensure effective communication and consultation on health and safety matters through the following means:-

- Noticeboards and Intranet
- Email Safety Alerts
- Team and staff meetings

3.3 Training and Competence

Every new employee will receive induction training that will include relevant health and safety matters.

Every employee will receive training on activity related risk assessments and safe systems of work/procedures relevant to their specific role/tasks.

Every employee will undertake the necessary training to ensure that relevant/appropriate industry standards and qualifications are maintained.

Managers with responsibility for health and safety as detailed in this policy will be

required to undertake health and safety training to ensure competence and this will be subject to assessment.

Training needs will be identified annually through the employee appraisal process. A record of all training provided will be documented and maintained.

4. Monitoring and Auditing

The main areas of monitoring will include:

4.1 Accidents and Incidents

Near misses, incidents and accidents will be monitored and investigated with a view to identifying trends and eliminating causes.

4.2 Workplace Inspections

Regular workplace inspections will be performed by management to ensure compliance with current legislation and the effective implementation of the policy and safety arrangements.

4.3 Auditing

The appointed Health and Safety competent person (currently Law At Work) will carry out annual health and safety documentation audit and property safety inspections.

5. Review of Policy and Arrangements

This policy and the associated arrangements will be subject to review as follows: -

- In response to changes in health and safety legislation
- Through the introduction of new health and safety legislation
- From significant learning following operation of the policy and arrangements
- In response to the findings of accident investigation
- In response to the findings of internal and external audit processes.

All records of changes to the policy and arrangements will be retained for future reference and subject to audit as required.