

Paragon Asra Housing Limited

Health and Safety Policy

July 2020

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| Owning manager | Chris Whelan, Executive Director Development & Sales |
| Department | Business Development |
| Approved by | Board - 24 November 2017 and Reviewed by EMT July 2020 |
| Next review date | September 2022 |

| | Contents | Page |
|----------|--|-------------|
| 1 | Policy Statement | 3 |
| 2 | Organisation and management responsibilities for Health and Safety | 5 |
| 3 | Health and Safety arrangements | 12 |
| 4 | Linked Policies | 13 |

Paragon Asra Housing Limited (PA Housing) is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all of our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats we will provide them.

AUDIT LOG

| Date of Change | Who updated | Details of the change |
|----------------|--------------|--|
| 10 July 2020 | Chris Whelan | Update and review and to change Executive Management Team details. |
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1. Policy Statement

Paragon Asra Housing (PA Housing) takes Health & Safety very seriously and acknowledges its legal responsibility to ensure the health, safety and welfare of its employees at work, as well as protecting others who may be affected by PA Housing's work activities.

The Board and the Executive Management Team (EMT) which comprises the Chief Executive, Executive Director of Resources, Executive Director of Development & Sales, and the Executive Director of Assets believe that the health and safety of residents is a fundamental part of PA Housing's role. Our aim is to minimise risks to people's safety and health and so to reduce the incidence of accidents, injuries and other harmful consequences by complying with relevant legal requirements and good health and safety practice.

This statement outlines PA Housing's approach to health and safety and acknowledges its responsibility as an employer under health and safety legislation.

PA Housing will:

- Take all reasonable measures to ensure as is reasonably practicable, the health, safety and welfare of its employees, residents, contractors, suppliers and visitors to its premises, offices and properties.
- Provide adequate information, instruction, training and supervision for employees to ensure safety at work.
- Communicate risk, controls and specific duties under safety legislation to ensure the safety at work of its employees.
- Facilitate employee communication and consultation on health and safety matters through the Health and Safety Committee, the recognised unions' workplace representatives, the PA Housing Staff Committee, team meetings, 1-1 meetings, the use of email, and intranet notice boards and blog sites.
- Provide work equipment that is suitable, sufficient and assessed and ensure employees are trained in its use, maintenance and storage as required.
- Report and investigate accidents, incidents, near misses and acts of aggression as appropriate.
- Complete appropriate hazard identification and risk assessments for tasks, activities and operations, seeking specialist advice when the risks are uncertain.
- Provide a high standard of control of the health and safety risks arising from its activities and any changes that may increase risk.
- Promote this policy but accept that teams should develop and apply specific protocols, practices, and standards to support the policy.
- Provide sufficient resources for health and safety and seek continuous improvement.

- Promote safety at all levels and take appropriate disciplinary action for serious breaches of health and safety.
- Communicate this policy widely, review it annually and re-issue it as appropriate.

Implementation and monitoring

Each EMT member will take responsibility for:

- Implementing and meeting health and safety requirements, objectives and targets.
- Promoting this policy, monitoring performance and seeking continuous improvement in safety.
- The performance of their managers against this policy and associated procedures, and remedial action on identified deficiencies.

Adherence with this policy and the separate safety policies, procedures and standards will be monitored, reviewed and audited at regular intervals.

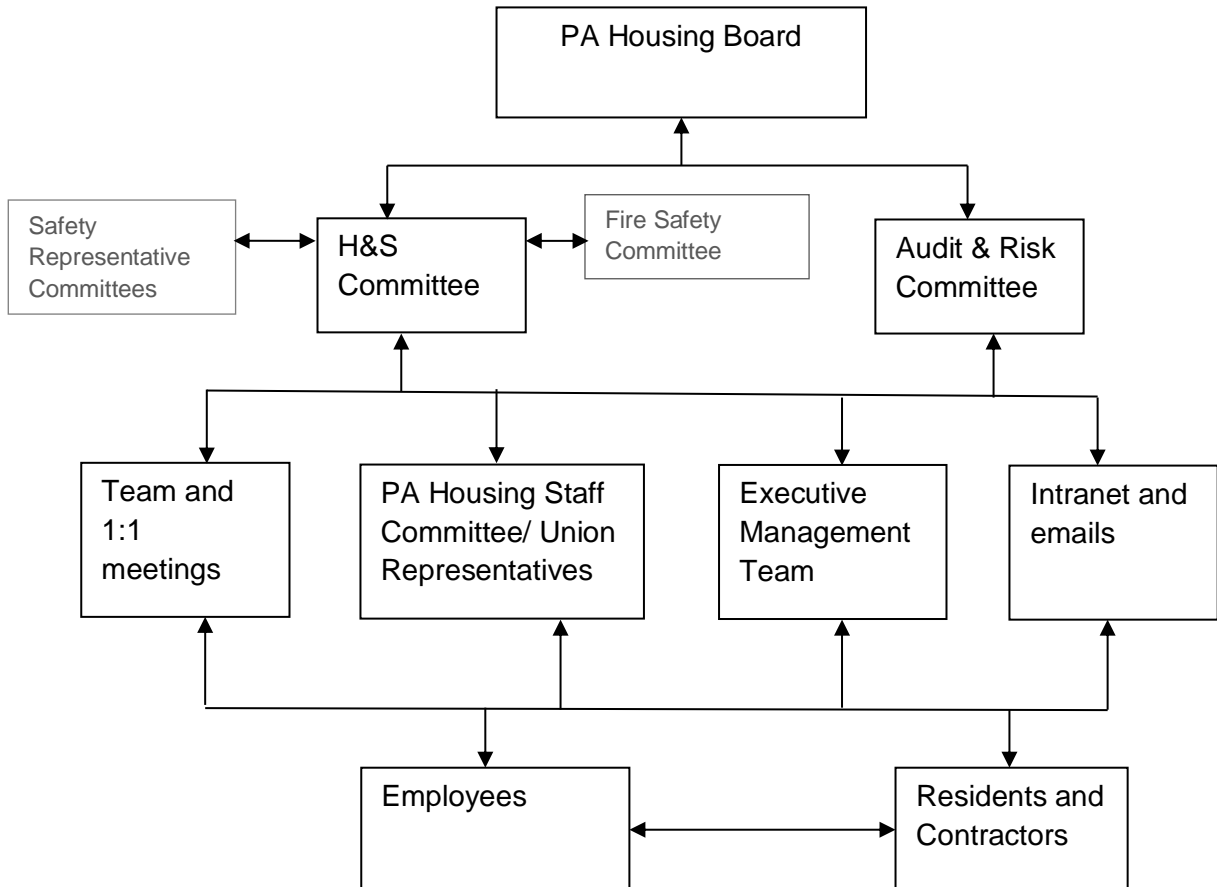
Dilip Kavi

Chief Executive

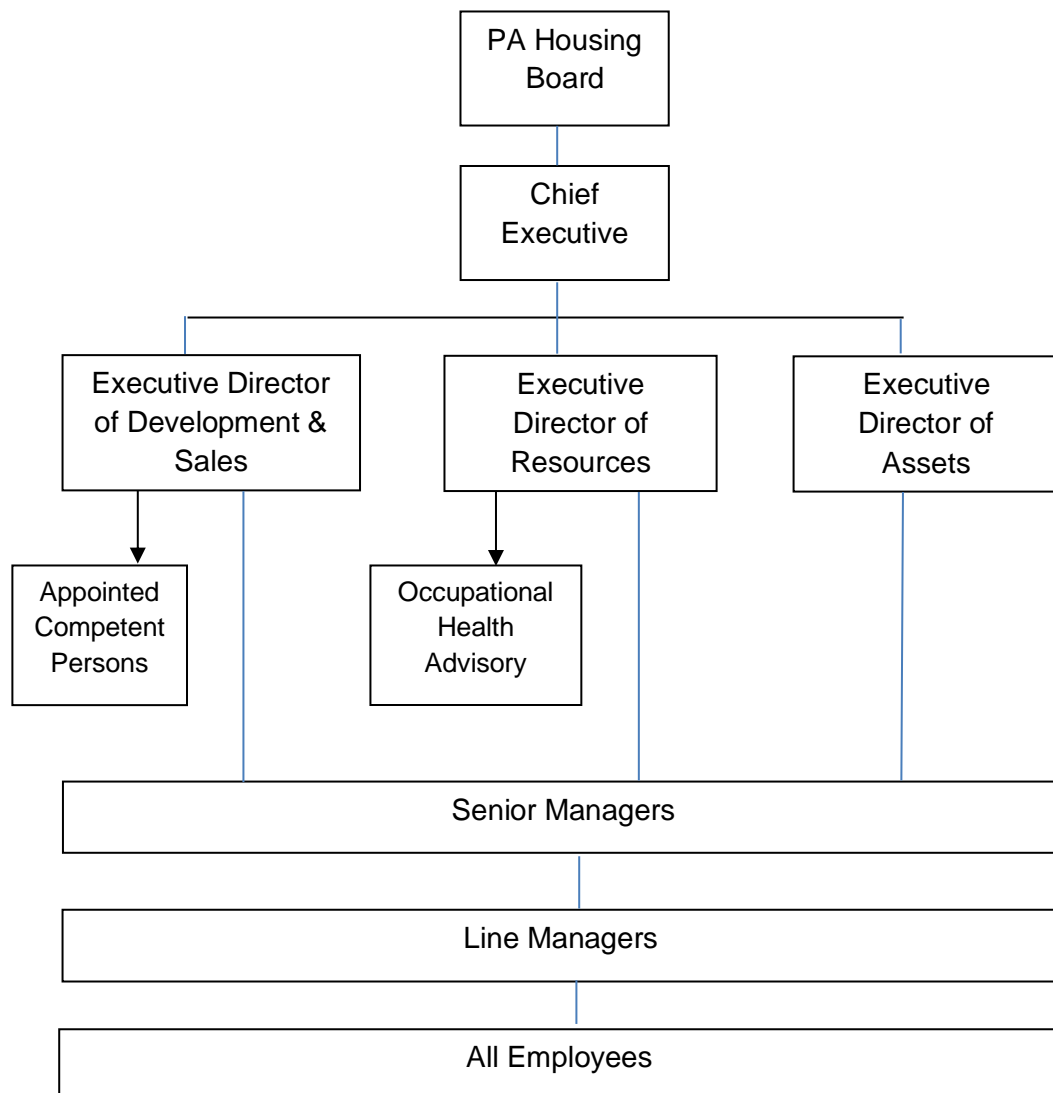
July 2020

2. Organisation of Health and Safety

2.1 Organisation structure for Health and Safety communications and consultation



2.2 Organisation for Health and Safety



2.3 H&S responsibilities and duties

PA Housing Board

| H&S responsibilities | Specified H&S duties |
|--|---|
| <ul style="list-style-type: none"> • Overall responsibility for H&S and will ensure it has proper oversight of all H&S issues. • Set overall H&S priorities • Appoint a member of the Board to sit on the Health and Safety Committee to review and monitor the management of H&S on behalf of the Board. • Delegate the duties, responsibility and authority to a member of the Executive Management Team (EMT) to lead PA Housing's H&S efforts. • Ensure that adequate resources are available for the management and monitoring of H&S at PA Housing. | <ul style="list-style-type: none"> • Take leadership in H&S policy implementation and management • Oversee the Chief Executive and the other EMT members in implementing the policy, through the work of the H&S Committee and recommendations of the Audit & Risk Committee. • Approve this policy and annual budgets to ensure there are adequate resources to implement it. • Receive an annual report on H&S performance and ensure risk assessments are carried out and policies and procedures monitored. • Support the Chief Executive in his role. • Appoint a lead director for H&S to oversee its management. |

Chief Executive

| H&S Responsibilities | Specified H&S duties |
|---|--|
| <ul style="list-style-type: none"> • Demonstrate to all a visible commitment to promoting a high standard of H&S management and monitoring throughout PA Housing. • Delegate the duties, responsibility and authority, to a member of the EMT, to lead PA Housing's H&S efforts. • Ensure that adequate resources are available for the management, monitoring and associated H&S actions at PA Housing. | <ul style="list-style-type: none"> • Promote a safety culture and allocate sufficient resources to implement the requirements of this policy. • Ensure the policy is reviewed annually or earlier in the case of change to legislation or regulations. • Take competent professional advice and respond accordingly on matters of safety. • Inform the Board Chair of all H&S incidents or issues requiring the Board's attention. |

Executive Director of Development and Sales

| H&S Responsibilities | Specified H&S duties |
|---|--|
| <ul style="list-style-type: none"> • Delegated Day to Day responsibility from the Board and Chief Executive to lead the H&S effort at PA Housing. • Chair the H&S Committee. • Appoint suitably qualified and experienced person(s) (Appointed Competent Persons) as necessary to ensure all parts of the business have access to competent H&S advice and is subject to suitable impartial monitoring and reporting. • Approve or engage external H&S consultants where appropriate to provide additional support and/or specialist H&S advice as and when required. • Discharge responsibilities as a member of the EMT. | <ul style="list-style-type: none"> • Take overall responsibility for the H&S of staff when carrying out their work. • Take executive responsibility for implementing and supervising this policy and relevant procedures, including risk assessments. • Take appropriate disciplinary action in the event of any breach of or refusal to comply with statutory safety regulations or this policy. • Ensure all employees are given adequate safety training and training to enable them to fulfil their duties in accordance with this policy. • Ensure progress with H&S action plans is monitored regularly by EMT and there is an annual H&S report to the Board which includes safety performance of contractors. • Ensure any major accident or incident is reported through the Chief Executive as soon as possible to the Chair of the Board. • Investigate and ensure that there is learning from major accidents and incidents. • Ensure residents, visitors and contractors are provided with written information on fire safety and any other key risks which may affect the property or the resident, or any contractor carrying out work on behalf of PA Housing. |

Executive Management Team

| H&S Responsibilities | Specified H&S duties |
|---|---|
| <ul style="list-style-type: none"> • As defined in the Policy Statement. • To lead on H&S in all area of their responsibility. • Appoint suitably qualified and experienced person(s) (Appointed Competent Persons) as necessary to ensure that all area of their responsibility have access to competent H&S advice and is subject to suitable impartial monitoring and reporting. • Approve or engage external H&S consultants where appropriate to provide additional support and/or specialist H&S advice as and when required. • Discharge responsibilities as a member of the EMT. | <ul style="list-style-type: none"> • Endorse, monitor, support and implement the H&S policy. • Set policy standards and targets for H&S improvement within their remit. • Ensure adequate resources and systems are in place to protect H&S. • Attend and review H&S at H&S Committee meetings. • Consider H&S and its implications in all significant business decisions and ensure where necessary H&S is advanced relative to other aspects of decision making. |

Appointed Competent Person(s)

| H&S Responsibilities | Specified H&S duties |
|--|---|
| <ul style="list-style-type: none"> • Provide competent H&S advice, support, monitoring and reporting for areas of the business as assigned by the Executive Director Development & Sales/EMT. | <ul style="list-style-type: none"> • Keep the Chief Executive and EMT informed of changes in legislation which could have a direct impact or implications on their work or practice. • Liaise with external and enforcement agencies and report RIDDOR reportable accidents and incidents to the Health & Safety Executive. • Regularly update EMT on strategic and operational compliance. • Review and where necessary recommend changes to this policy and related procedures and provide H&S guidance to employees. • Co-ordinate the work of the H&S Committee. • Liaise with the H&S consultant and |

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| | <p>monitor their work.</p> <ul style="list-style-type: none"> • Conduct an annual H&S audit, including an audit of PA Housing's H&S management system. • Ensure all employees have access to this policy. • Undertake general reviews of all H&S areas, including the safety policies and procedures of contractors. • Ensure there are adequate welfare facilities for employees, maintained in good order. • Review accident/ Incident reports and maintain accident records for their assigned areas of the organisation, recording and investigating all known accidents and significant work-related H&S incidents or occurrences: reporting all major incidents to the Board through the EMT and Chief Executive. |
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Line Managers

| H&S Responsibilities | Specified H&S duties |
|---|---|
| <ul style="list-style-type: none"> • Understand and manage the risks which are relevant to the employees and activities within their remit. • Seek competent advice to ensure they are managing safely. | <ul style="list-style-type: none"> • Undertake and periodically review risk assessments for employees and activities within their remit. • Provide sufficient information, instruction, training and supervision to enable employees to carry out their work safely. • Ensure regular contact with employees who work remotely, monitoring their safety and wellbeing and ensuring they receive sufficient guidance and support. • Giving employees the opportunity to discuss H&S at team meetings and 1-1 meetings. |

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| | <ul style="list-style-type: none"> • Report and investigate all accidents, incidents and near-misses. • Disciplinary action in the event of any breach of or refusal to comply with H&S policies or procedures. • Ensuring all employees co-operate in meeting the aims of the policy. • To promote examples of exemplary safety initiatives. |
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All employees

| H&S Responsibilities | Specified H&S duties |
|---|---|
| <ul style="list-style-type: none"> • To be aware of and understand the risks and controls which have been identified relevant to their activities and to keep all employees, residents, contractors and visitors safe. | <ul style="list-style-type: none"> • Follow all H&S and other procedures related to this policy. • Co-operate with their manager and follow instructions on safe working practices, including the policy and procedure on lone working. • Attend H&S training as provided. • Follow the policies, procedures and risk assessments for their position and activities, adhering to all risk management procedures and risk control measures or immediately notify their line manager if they are unable to do so. • Report promptly to their line manager any accident, incident, near miss, unsafe conditions, acts of aggression, potential hazards or shortcomings in H&S, its procedures or policies which may compromise the H&S of themselves or others at work. • Use as instructed the equipment provided, including personal protective equipment and undertake training in its use if required. |

3. Health & Safety arrangements

- 3.1 PA Housing's H&S arrangements are based on the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.
- 3.2 The Board has overall responsibility for H&S and will ensure it has proper oversight of all H&S issues. The Board has appointed a Board member to the H&S Committee, the steering group responsible for reviewing and monitoring the management of H&S matters affecting PA Housing and providing reports on H&S performance to the EMT and the Board.
- 3.3 The Board and Chief Executive have delegated day to day responsibility to the Executive Director of Development and Sales to lead on H&S operationally, including chairing the H&S Committee.
- 3.4 The Audit and Risk Committee (ARC) is responsible to the Board for ensuring the internal audit review of H&S controls and for monitoring the scope and effectiveness of the systems established by the EMT to identify, assess and manage all material risks. The ARC is also responsible for monitoring the implementation of any recommendations for improvement identified through audit or other measures.
- 3.5 EMT is responsible for ensuring that H&S is continually improved and that line management responsibilities for H&S are clearly defined and implemented. EMT is also responsible for ensuring that effective consultation on H&S takes place with competent persons, employees, staff and residents and that these groups are encouraged to participate in achieving H&S objectives and that necessary resources are provided.
- 3.6 Responsibility for H&S extends through line managers to every employee. Departments and teams will implement procedures and instructions as appropriate to the management of risk, which are particular to its activities, employees and contractors.
- 3.7 To further support fire safety there is a Fire Safety Committee. This is a steering group in support of the H&S Committee with regard to fire safety. It provides reports to the H&S Committee on fire safety performance and reviews and monitors the management of fire safety across PA Housing.
- 3.8 Separate safety policies and procedures are implemented where appropriate to meet specific legislative requirements, for areas of significant risk to the whole organisation, and for areas of significant risk which are relevant to individuals across multiple areas of the organisation. This includes, but is not limited to:
 - Accident Prevention and Wellbeing
 - Accident and Incident Reporting
 - Asbestos
 - Electrical Inspection and Testing
 - Fire Safety
 - Gas Safety
 - Working at Height
 - Noise at Work

- Office and Computer Work
- Legionella Management
- Lift maintenance
- Lone Working and Personal Safety
- Van and Car Drivers

- 3.9 The effective means of internal communication on H&S matters down from the H&S Committee, is through the Regional Safety Representatives Committees, which are forums of H&S excellence where staff safety representatives and union safety representatives can consider, consult, or be consulted on H&S issues. Issues and how they are resolved are reported to the H&S Committee.
- 3.10 Communication on H&S is also through the PA Housing Staff Committee and the workplace representatives of the recognised unions, team meetings, emails and the intranet where policies, procedures and forms are kept.
- 3.11 The normal reporting channel for any employee in relation to an H&S matter at work is through their line manager or the Appointed Competent Person(s). Staff can also raise H&S issues through their union or PA Housing Staff Committee representatives or through the Regional Safety Representatives Committee.
- 3.12 All members of staff are trained in H&S as part of their induction, and are required to complete e-learning courses in fire safety, manual handling and risk assessment every three years. There is access to Occupational Health advisers for all staff through HR.
- 3.13 Board and EMT members receive training on their H&S responsibilities within one month of appointment and thereafter at least every three years.

4. Linked policies

Business Continuity
 Risk Management Framework
 Disciplinary
 Recruitment and Selection
 Sickness Absence

5. Review and document control

- 5.1 This policy shall be reviewed on an annual basis, or sooner if deemed necessary. It is a controlled document and no changes can be made without approval from the Board.