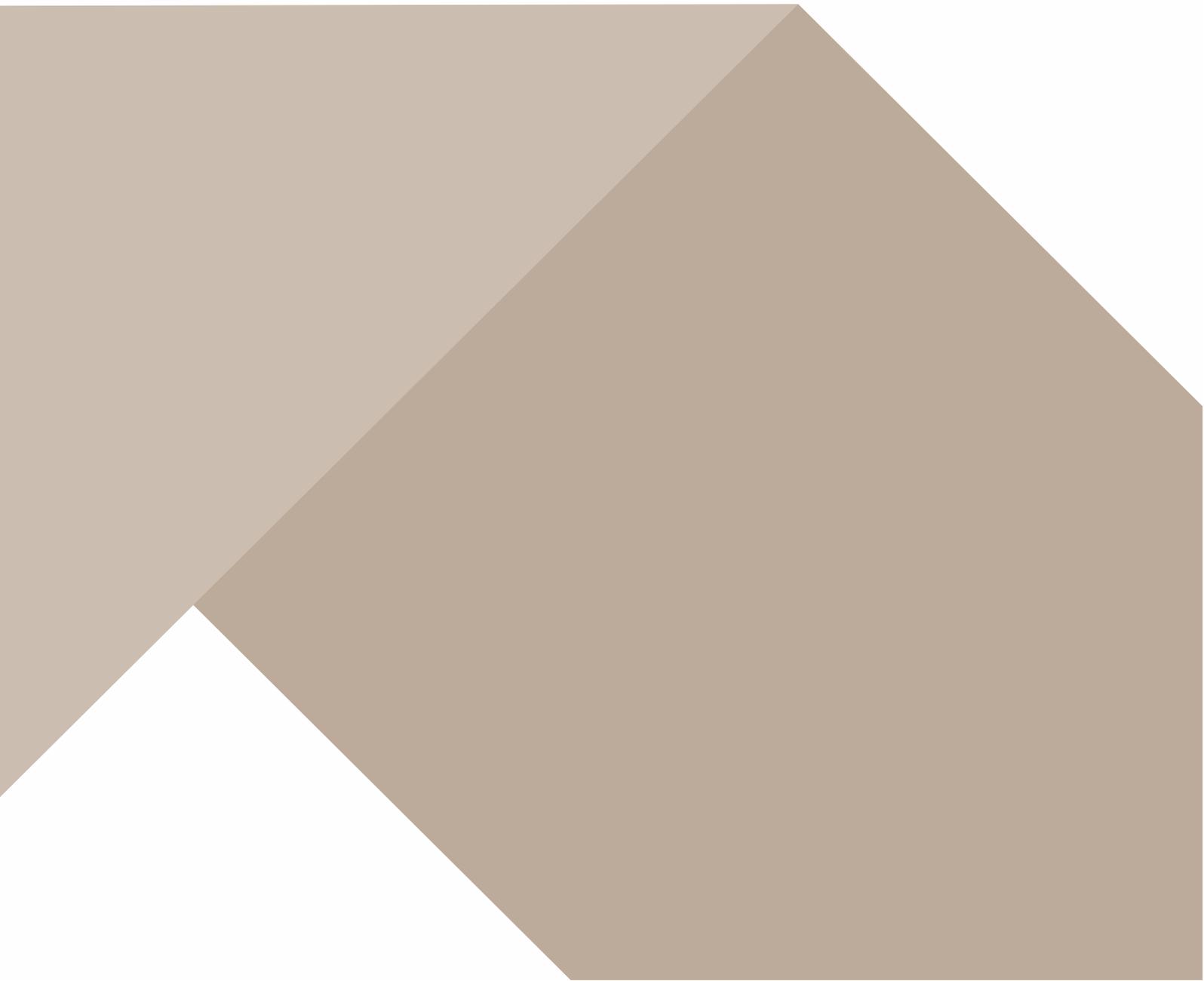


# Group Health and Safety Policy

**December 2021**



## Wheatley Group's Health and Safety Statement

It is the policy of all Wheatley Group subsidiaries to safeguard, as far as reasonably practicable, the health, safety and welfare of its staff and all persons likely to be directly affected by the activities of the Group.

The Wheatley Group subsidiaries acknowledge that successful health and safety management contributes to overall performance, and they are therefore committed to the following:

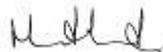
- All Group subsidiaries achieving compliance with legal and other relevant requirements through good health, safety and welfare management practices.
- Providing adequate staff and funding resources to implement this Group Health and Safety Policy
- Establishing and maintaining a safe and healthy working environment
- Striving to prevent avoidable injury or ill-health
- Striving for continual improvement in relation to Health & Safety performance
- Ensuring that significant risks arising from work activities under our control are eliminated or adequately controlled;
- Developing and implementing appropriate occupational health and safety management system procedures, and safe working practices;
- Incorporating the management of health and safety as a specific management responsibility;
- Ensuring this policy is understood and implemented across the group;
- Engaging employees, employer and trade unions in health and safety decisions through consultation and co-operation;
- Maintaining workplaces under our control and in conjunction with other landlords where there is shared occupancy, in a safe condition without risk to health or physical and mental wellbeing;
- Reviewing on a regular basis compliance with the Group Health and Safety Policy and the management systems that underpin this policy;
- Providing sufficient information, instruction, and assistance in implementation of control measures and supervision; to enable all staff to recognise hazards, use control measures and safe working practices to avoid incident, injury and ill health.
- Ensuring that staff receive appropriate training, supervision (where task deems necessary) and personal protective equipment (PPE) and are competent to carry out their designated responsibilities;
- Ensuring that there is oversight of and involvement where appropriate with designers and contractors appointed to undertake construction work on behalf of Group subsidiaries

The Group Health and Safety Team will develop supporting Health and Safety Management Arrangements and Operational Safety Manuals which form the basis for the on-going development of the Health and Safety Management System. The details within the management arrangements and the Operational Safety Manuals detail the processes and procedures to achieve legislative compliance. These responsibilities are shared and delegated amongst Directors and Managers across the Group.

The Operational Safety Manuals will be made available to all subsidiaries.

The Director of Assets and Sustainability will have responsibility for administering and positively maintain the implementation of The Wheatley Group Health and Safety Policy supported by The Wheatley Group Health and Safety Lead

Signed



Date: 20 December 2021

Martin Armstrong (Chief Executive)

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## Section 1 Introduction

1.1 The Wheatley Group ('The Group') is Scotland's leading housing, care and property-management group. It comprises six Registered Social Landlords, a care organisation and a commercial subsidiary. The Group provides homes and services to over 210,000 people in 19 local authority areas across Scotland

1.1 .1 Our Group subsidiaries are:

- Glasgow Housing Association
- Dumfries and Galloway Housing Partnership
- Dunedin Canmore Housing
- Loretto Housing Association
- Lowther Homes
- West Lothian Housing Partnership
- Wheatley Care
- Wheatley Solutions

1.1.2 City Building Glasgow is a shared 50/50 split Joint Venture with Glasgow City Council and Wheatley Group. City Building Glasgow have their own Governance arrangements in place and manage their own health and safety processes required to ensure their statutory obligations are being met.

1.1.3 This Group Health and Safety Policy applies to and binds all staff of the Group and its subsidiaries in meeting the requirements of the Health and Safety at Work Act and supporting legislation. Adherence to The Wheatley Group Health and Safety Policy is both an individual and a corporate responsibility; disciplinary action may be initiated against staff that knowingly fail to adhere to safety procedures or standards or fail to use PPE as identified in risk assessment.

1.1.4 The purpose of The Wheatley Group Health and Safety Policy is to set out the general operating principles covering all the activities undertaken within the Group. It sets out the Group's responsibilities to comply with health and safety legislation and the general arrangements to support compliance.

1.1.5 Should you require any assistance or guidance with any health and safety matter please contact [WheatleyhealthandSafety@wheatley-group.com](mailto:WheatleyhealthandSafety@wheatley-group.com).

## Section 2

### Principles, Aims and Objectives

- 2.1 It is the duty of all Group subsidiaries to safeguard, as far as reasonably practicable, the health, safety and welfare of its staff and all persons likely to be directly affected by the activities of the organisation.
- 2.1.1 All Group subsidiaries acknowledge that successful health and safety management contributes to overall performance, and are committed to the following:
- Achievement and maintenance of compliance with legal and other relevant requirements through good occupational health and safety performance
  - Provision of adequate staff and funding resources to implement this policy
  - Establishment and maintenance of a safe and healthy working environment
  - Striving to prevent avoidable injury or ill-health and continual improvement in relation to Health and Safety performance by investigating accidents to identify the root causes and trends and to ensure lessons learned are shared to avoid reoccurrence
  - Ensuring that significant risks arising from work activities under our control are eliminated or adequately controlled
  - Developing and implementing appropriate occupational health and safety procedures and safe working practices
  - Incorporating the management of health and safety as a specific management responsibility
  - Ensuring this policy is understood and implemented across the Group
  - Engaging staff, employer and trade unions in health and safety decisions through consultation and cooperation
  - Maintaining workplaces under our control in a safe condition without risk to health or physical and mental wellbeing
  - Reviewing compliance with The Wheatley Group Health and Safety Policy and the management systems that underpin this policy on a regular basis
  - Providing sufficient information, instruction, training, assisting in implementation of control measures, personal protective equipment (PPE) and supervision to ensure staff are appropriately equipped and competent to carry out their designated duties, avoid hazards and to engage with their health and safety at work
  - Having oversight of the Contractors and Safety Consultants (e.g. Principal Designers) we appoint to our construction, investment and repairs projects.

## Section 3

### Legal and Regulatory Requirements

- 3.1 The Health and Safety at Work Act 1974 requires the Group subsidiaries to ensure, so far as is reasonably practicable, the health, safety and welfare of all staff while at work. Group subsidiaries also have a responsibility to ensure that others not employed but who may be affected by the subsidiaries' work-related activities are not exposed to risks to their health and safety.
- 3.1.1 Under the Management of Health and Safety at Work Regulations, there is a responsibility to manage health and safety effectively.
- 3.1.2 As a minimum, the following processes and procedures will be put in place to meet the required legal requirements: The Group will adopt the intentions of HS(G)65 and arrangements will be developed and reviewed in line with 'Plan, Do, Check, Act' ethos, which will apply to all preventative and protective measures, including:
- A written Health and Safety policy (this document);
  - Arrangements for the effective planning, organisation, control, monitoring and review of the preventive and protective measures that come from risk assessments;
  - Assessments of the risks to staff, contractors, customers, partners, and any other people who could be affected by our activities taking account of the general principles of prevention i.e., avoidance, prevention, reducing, protection against risks occurring.;
  - Records of all significant findings in writing
  - Arrangements for appointing one or more competent persons to ensure compliance with the relevant statutory provisions, and ensuring access to competent health and safety advice;
  - Provision of information to staff about the risks in their workplace and the preventive and protective measures;
  - Instruction and training for staff in how to deal with the risks;
  - Ensuring there is adequate and appropriate supervision in place;
  - Consulting with staff, representatives and Trade Union representatives about their risks at work and current preventive and protective measures;
  - Carrying out due diligence and ongoing oversight of the contractors and Principal Designers we appoint to ensure they have the skills, knowledge, experience and organisational capability to comply with health and safety legislation and provide the expected outcomes of the project;

- Documenting risk assessments, health and safety incidents, F10 forms and construct health and safety files at a central location for each Group subsidiary;
  - Ensuring that the Health and Safety Executive are provided with the notifications in accordance with current legislation.
- 3.1.3 Group subsidiaries are committed to managing any risks as far as reasonably practicable posed to our staff, customers, contractors, partners and the general public in relation to the work that we undertake.
- 3.1.4 Group subsidiaries will meet their duty to manage Health and Safety in line with relevant legislation and established best practice set out in Approved Code of Practices and relevant Guidance Documents.
- 3.1.5 The Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations require Group's Care Subsidiaries to ensure the following as a Provider:
- Make proper provision for the health, welfare and safety of service users;
  - Provide services in a manner which respects the privacy and dignity of service users;
  - Ensure that no service user is subject to restraint, unless it is the only practicable means of securing the welfare and safety of that or any other service user and there are exceptional circumstances. Any use of restraint or physical intervention must be recorded within a service users care plan and be of an accredited recognized technique and intervention protocol;
  - Staff should be trained appropriately in an accredited physical intervention risk assessment system which underpins the use of physical intervention;
  - Where necessary, have appropriate procedures for the prevention and control of infection with all appropriate information shared with staff. Staff should receive appropriate information/instruction and training for effective infection control;
  - As a provider of a care home, make necessary arrangements for the provision of adequate services from a health care professional to service users;

## Section 4 Roles and Responsibilities

4.1 The following health and safety accountabilities have been assigned to competent positions across the Group, to enable us to meet the objectives set out in our Group Health and Safety policy and written Management Arrangements.

4.1.1 The following table shows the duty holders for managing health and safety across the Group.

Subsidiary/Business area	Duty Holder
Glasgow Housing Association	Managing Director
Dumfries & Galloway Housing Partnership	Managing Director
Dunedin Canmore Housing Association	Managing Director
Repairs, Investment and Compliance	Director of Repairs, Investment & Compliance
Loretto Housing Association	Managing Director, Dunedin Canmore
Lowther Homes	Managing Director
West Lothian Housing Partnership	Managing Director, Dunedin Canmore
Wheatley Care	Managing Director
Wheatley Solutions	Director of Assets and Sustainability Director of Development & Regeneration Directors' of Wheatley Solutions
Wheatley 360	Managing Director

### 4.2 Wheatley Group Board

4.2.1 The Board is responsible for providing leadership, to ensure that Board decisions reflect its Health and Safety intentions as laid out in The Wheatley Group Health and Safety Policy and have arrangements in place to ensure all significant issues and failings are reported to the board, to ensure full cognisance is reflected in Board decisions and priorities of Wheatley Group.

### 4.3 Wheatley Group Chief Executive

4.3.1 The Chief Executive has overarching accountability for the formulation and implementation of The Wheatley Group Health and Safety Policy. However, it is important to recognize that this duty is shared with Group Directors, Managing Directors, Directors, Managers and staff with specific responsibilities inherent within their role and function:

- Ensuring that the necessary arrangements are in place for managing health and safety effectively, and that senior managers are accountable for health, welfare and safety;
- Providing Health and Safety Leadership within the Wheatley Group;
- Considering health safety and welfare during the planning and implementation of the Group's business strategy;

- Ensuring the responsibility for the implementation of compliance of this policy is assigned by Directors to managers and staff within their control;
- Ensuring there are sufficient resources for meeting the objectives of The Wheatley Group Health and Safety Policy.
- Ensuring arrangements are in place for consultation with staff and trade unions, and that they are involved in decisions relating to health and safety, and that progress in relation to health and safety is communicated to them;
- Including health and safety on the agenda of Board meetings and executive team meetings, providing leadership to all staff to promote and support a positive health and safety culture;
- Ensuring the provision and maintenance of a working environment for staff and other persons on our sites that is safe, without risks to health and adequate as regards facilities and arrangements for their welfare, so far as is reasonably practicable;
- Ensuring our 'New Operating Model' for Homeworking is safely implemented and suitable measures and resources are available to ensure the continued health, safety and wellbeing of staff.
- Ensuring arrangements are in place to monitor and review health and safety performance across each of the Group subsidiaries, including accidents and incidents; and ensuring that the necessary amendments are made to relevant policies, procedures and processes where necessary;
- Oversight of our contractors and Principal Designers' health and safety procedures as part of procurement and vetting procedures.

#### **4.4 Managing Directors & Directors**

- 4.4.1 Managing Directors and Directors of Group subsidiaries will be responsible for the application of this policy through the nomination of staff with delegated duties and responsibilities, and allocation of financial resources to ensure that they meet their Health and Safety management responsibilities.
- 4.4.2 Managing Directors and Directors are responsible for the implementation of the Group's Health and Safety policy, and in particular for:
- Ensuring that health, welfare and safety concerns are part of the planning and implementation of business strategy;
  - Ensuring that the necessary arrangements are in place for managing health and safety effectively, and that senior managers are informed of their responsibilities as part of their role and functions for health, welfare and safety;
  - Ensuring that managers within their area of responsibility are suitably trained, competent and fully understand their health and safety obligations;

- Ensuring there are sufficient resources for meeting the objectives of The Wheatley Group Health and Safety Policy;
- Ensuring arrangements are in place for consultation with staff and trade unions and that they are involved in decisions relating to health and safety, and that progress in relation to health and safety is communicated to them;
- Ensuring the provision and maintenance of a working environment for staff and other persons on site that is safe, without risks to health and adequate as regards facilities and arrangements for their welfare at work; so far as is reasonably practicable;
- Including health and safety on the agenda of senior executive team meetings;
- Ensuring arrangements are in place to monitor and review health and safety performance for each Group subsidiary, including accidents and incidents; and ensuring that the necessary amendments are made to relevant policies, procedures and processes.

#### **4.5 Director of Assets and Sustainability**

4.5.1 The Director of Group Assets will be responsible for the Group Health and Safety Team and Fire Safety Team to include the following duties:

- Providing leadership to promote a positive health and safety culture across the Group;
- Overseeing the activities of the Group Health and Safety Lead, Group Health and Safety Managers and Fire Safety Manager and their respective team of advisors.
- Chairing the Health and Safety Strategy Meeting to drive a positive health and safety culture and meet our obligations under the Safety Reps and Safety Committee Regulations.
- Engage and persuade stakeholders on the importance of promoting a positive health and safety culture;
- Report to the Group board regularly on the Group's health and safety and fire safety performance.

#### **4.6 Group Health and Safety Lead**

4.6.1 The Group Health and Safety Lead is responsible for developing and communicating a Health and Safety management framework and providing the competent and comprehensive assistance to the Wheatley Group and its subsidiaries including the following:

- Setting the strategic direction for health and safety practice across the Group
- Establishing and maintaining The Wheatley Group Health and Safety Policy, management arrangements and Operational Safety Manual;

- Supporting Directors and managers with responsibilities for Health and Safety to meet, deliver and maintain statutory obligations for health and safety;
- Providing advice and guidance to all staff and especially those staff with specific health and safety responsibilities;
- Providing a programme for staff Health and Safety training and ensure records are kept up to date;
- Provision of liaison and support on all matters relating to health and safety across the Group;
- Chairing the Health and Safety Operations Meeting to drive a positive health and safety culture and meet our obligations under the Safety Reps and Safety Committee Regulations.
- Provision of liaison and support on all matter relating to health and safety across the group with HR and Occupational Health as required;
- Liaising with Health and Safety Executive and other enforcement bodies on all statutory health and safety matters;
- Monitoring the implementation of The Wheatley Group Health and Safety Policy and management arrangements, by audits, site visits and liaison with managers;
- Periodically reporting on health and safety and fire safety performance to Boards and relevant stakeholders.

Ensuring arrangements are in place to provide assistance in the case of investigation of Accidents, Incidents and Near misses where necessary.

## **4.7 Group Health and Safety Manager(s)**

4.7.1 The Group Health and Safety Manager(s) are responsible for assisting the Group Health and Safety Lead in developing and communicating a health and safety management framework and providing the competent and comprehensive assistance to the Wheatley Group and all its subsidiaries including the following:

- Setting the strategic direction for care Health and Safety practice across the Group in the context of the Group Health and Safety Policy
- Establishing and maintaining The Wheatley Group Health and Safety Policy, management arrangements and Operational Safety Manual for care subsidiaries;
- Supporting Directors and managers with responsibilities for care related Health and Safety to meet, deliver and maintain statutory obligations for health and safety;
- Providing advice and guidance to all staff and especially those staff with specific care related health and safety responsibilities;

- Providing a programme for staff Health and Safety training and ensure records are kept up to date;
- Provision of liaison and support on all matters relating to Health and Safety across the Group;
- Chairing and driving positive change through recognised Management Working Groups to include but not limited to, Lone Working Group and Trades Working Group etc.
- Provision of liaison and support on all matter relating to health and safety across the group with HR and Occupational Health as required;
- Liaising with Health and Safety Executive and other enforcement bodies on all statutory health and safety matters;
- Monitoring the implementation of The Wheatley Group Health and Safety Policy and management arrangements, by audits, site visits and liaison with managers;
- Ensuring arrangements are in place to provide assistance in the case of investigation of Accidents, Incidents and Near misses where necessary.

## 4.8 Managers

4.8.1 Managers (e.g. Locality Housing Directors, Care Managers, Facility Managers, Environmental Managers etc.) will be responsible for ensuring that The Wheatley Group Health and Safety Policy is implemented within their structure. Managers must ensure risks are assessed and all required and appropriate controls implemented within the workplace and on our sites to ensure that safe conditions and systems of work are maintained. Where hazards are identified the manager must ensure that suitable and sufficient controls are in place, so far as is reasonably practicable.

Where any concern exists advice should be sought from the Group Health and Safety team.

4.8.2 The arrangements will meet the expectations of HS(G)65 Health and Safety management where Plan, Do, Check and Act will underpin the Wheatley Group Health and Safety management system. The intention of this will be to ensure the preventive and protective measures identified are in place, working effectively and regularly monitored.

4.8.3 Management duties include the following:

- Ensuring that staff, contractors and visitors are aware of safety procedures and make arrangements to ensure that all staff, including temporary workers, are familiar with The Wheatley Group Health and Safety Policy and that they are provided with relevant information, instruction, training and supervision to ensure their competence on the use of equipment, plant, machinery and substances;
- Establishing that all equipment, plant, machinery and substances used are suitable for the task and that their use is reviewed if staff role/function changes, or if there is a new system of work introduced, new work equipment, or new technology, through detailed risk assessments;

- Establishing that all equipment, plant, machinery and substances used are kept in good working condition; this includes the regular maintenance and servicing of equipment and machinery and retaining inspection and maintenance records;
- Liaise with the Group Health and Safety Team to participate in the process of risk assessments of workplaces, activities/equipment and sites' This will ensure the provision and maintenance of a working environment and work activities for staff and other persons on our sites that is safe, without risks to health and adequate as regards facilities and arrangements for their welfare, so far as is reasonably practicable. All risk assessments will be carried out in accordance with legislative requirements with regards to review timescales;
- Providing suitable and sufficient training, information, instruction and supervision to ensure work is conducted safely and that records of training are up-to-date;
- Have knowledge and understanding of how to access or request training records from The Groups Learning Management System, managed by the Wheatley Academy, to demonstrate compliance with health and safety requirements;
- Ensuring contractor management processes are in place and are followed in the areas of their control;
- Taking immediate and appropriate steps, to investigate and rectify any foreseeable risks to health and safety arising from the work activity or environment;
- Ensuring that all relevant personnel have the required Personal Protective Equipment (PPE) and that it is maintained/replaced as required;
- Bringing to the attention of local senior management any health and safety issue that requires their attention;
- Ensuring that all accidents, incidents and "near misses" are properly recorded, reported and investigated to determine causal factors;
- Maintaining safe access to and egress from the workplace at all times;
- Ensuring that relevant advice is sought from the Group Health and Safety team when required.

## **4.9 Construction, Design and Management**

4.9.1 Managers who are responsible for initiating construction, repairs and investment work will be subject to the Construction (Design and Management) Regulations. They must take appropriate steps to ensure work is planned in accordance with relevant standards and statutory provisions. They must fulfill the role of "Client" as follows:

- Ensuring that appropriate due diligence of all main contractors and Group Health and Safety Consultants we appoint is carried out prior to their appointment;

- Ensuring that the principal contractor and principal designer have the skills, knowledge, experience and organisational capability to comply with health and safety legislation and carry out their duties;
- Ensuring monitoring of the principal contractor and principal designer is undertaken until the completion of the project and document the information;
- Collating F10 forms and health and safety files at a central location for the relevant Group subsidiary;
- Ensuring that the Health and Safety Executive is provided with the notifications in accordance with current legislation;
- Reporting any concerns over health and safety to the Group Health and Safety Team as soon as reasonably practicable.
- CDM Regulations places duties on clients, principal designers, principal contractors, contractors and self-employed persons. All are required to work together ensuring Health and Safety is incorporated into projects as early as possible.
- Managers of construction teams/projects must ensure safety management systems are in place to control project arrangements.
- Ensuring that appropriate arrangements are in place for the management of Temporary Works for their duration in any construction or associated projects.
- The Group will put systems in place to ensure all contractors working for Wheatley Group in Wheatley Group properties are vetted from a Health and Safety perspective.

Additional guidance with regards to construction is available from the HSE <http://www.hse.gov.uk/index.htm>

#### 4.10 Group Health and Safety Team

4.10.1 The role and function of the Group Health and Safety Team is to maintain and promote an effective Health and Safety ethos and Health and Safety management system throughout the Group. The team will support all staff and management to implement the Health and Safety management system and comply with regards to all legislation and the principles of this Group Health and Safety policy.

4.10.2 Responsibilities of the Group Health and Safety Team include:

- Developing, review and updating of the Group Health and Safety arrangement documents and management system (OSM) for all parts of the business;
- Advising the Group on new legislative updates, Regulations, Codes of Practice and guidance notes relevant to its operations;
- Providing management with advice and support to meet their Health and Safety responsibilities;

- Assisting management in the on-going development, implementation and review of risk assessments;
- Inspecting/auditing/carrying out due diligence of operational functions of contractors and Principal Designers and providing written reports to operational management on findings and necessary action;
- Providing written reports to senior management on Health and Safety matters and the implications of statutory and common-law Health and Safety requirements;
- Promoting Health and Safety training and educational programs to develop Health and Safety awareness at all levels within the organisation;
- Training will be at a level to develop competence for staff with specific roles and responsibilities;
- Arranging and providing of Health and Safety training for all relevant personnel as necessary ensuring attendee details are updated on the Learning Management System;
- Ensuring that all reportable accidents/incidents within the Group are reported to the relevant enforcing authority and our insurers as required under the applicable regulations;
- Reviewing and investigating where necessary all accidents and incidents (including near misses) arising from operational functions and subsequent provision of advice to management in remedial or preventative measures;
- Liaising with external organisations and agencies as required;
- Providing statistical analysis on reportable accidents/incidents, and near misses.

#### **4.11 Powers of the Group Health and Safety Team**

4.11.1 To effectively implement the principles of The Wheatley Group Health and Safety Policy, the Group Health and Safety team will have the following control:

- The right to enter any Wheatley Group or Subsidiaries premises/ construction sites at any time for the purposes of inspection, audit and investigation;
- Where it is the belief of a Group Health and Safety Team member that there is an immediate risk of serious personal injury, the Group Health and Safety Team, in consultation with management, will take appropriate action that may include the immediate cessation of activity;
- In the event of major incident/accident to: (a) ensure that plant and equipment is not disturbed, and (b) to impound any equipment machine, substance or product which is required as part of an investigation, whilst liaising with relevant management in the area affected;
- Where a Group Health and Safety Advisor or Fire Safety Officer is of the opinion that a building or structure is a serious danger to staff or others, then the officer in consultation

with management will take action which may include the temporary closure of a premise in extreme situations;

- To interview those with knowledge or information relevant to the investigation, and to obtain that knowledge/information either verbally or in a written statement. The Group Health and Safety Advisor or Fire Safety Officer has discretion on who can be present during questioning and the taking of a written statement not withstanding Union representative if appropriate;
- To inspect and take copies of books, photographs, measurements or documents required by them as part of an investigation.

#### **4.12 Group Employee Relations Team**

4.12.1 The Group Employee Relations Team support the welfare and health of staff throughout the organisation and have responsibility for policy relating to these areas.

4.12.2 The team will work closely with the Group Health & Safety Team to ensure that the health and safety of staff are supported.

#### **4.13 Care Management Team**

4.13.1 In addition to the general obligations for health and safety of Directors and Managers, the Group's Care Management Team have the following additional responsibilities which will be undertaken by relevant Care Manager(s):

- Making proper provision for the health safety and welfare of service users and staff;
- Providing services in a manner which respects the privacy and dignity of service users;
- Ensuring that no service user is subject to restraint, unless it is the only practicable means of securing the welfare and safety of that or any other service user/member of staff and there are exceptional circumstances which necessitate the intervention. Any physical interventions must be of a recognised and accredited scheme and staff should be appropriately trained and understand the ethos of the training system, interventions and the application of it;
- Where necessary, having appropriate procedures for the prevention and control of infection;
- As a provider of a care home, making necessary arrangements for the provision of adequate services from a health care professional to service users.

#### **4.14 Staff**

4.14.1 It is the duty of all staff to take all reasonable care for the health and safety of themselves, and any other persons who may be affected by their acts or omissions at work. They must also co-operate with managers, trade unions, staff representatives and other staff to fulfil Group

and subsidiary health and safety objectives and statutory duties. In particular, their duties include:

- Complying with the information, instruction, supervision and training they are given in a timely manner and keep training records up-to-date;
- Attend and complete all necessary Health and Safety training as required;
- Not undertaking hazardous work unless they are appropriately trained and have the appropriate authority to carry out the work;
- Using machinery, equipment or substances provided by the Group or its subsidiaries in accordance with any training and instructions provided in the use of that equipment, and in compliance with relevant statutory requirements and prohibitions;
- Ensuring that they have undertaken appropriate training and it is valid and current to allow authorised use of machinery and conduct specialised tasks. Work pressures and timescales must not impact on this. Staff should discuss with managers/Group Health and Safety Team and or Union representatives if this is perceived to be an issue or concern;
- Carrying out their work safely and without undue risk to themselves, colleagues or others who may be affected by their actions;
- Not intentionally interfering, misusing or ignoring arrangements, controls including procedures and items provided for health and safety purposes;
- Check tools and equipment before using them, and must not use equipment which they know to be damaged or faulty;
- Ensuring that any damage to equipment is reported immediately to their manager/supervisor and removed from service until it is repaired or replaced. Pressures and timescales should not impact on this;
- Not bringing any equipment, tools, etc. onto company premises without first obtaining permission from their supervisor/manager, electrical equipment must be PAT tested prior to use, unless newly purchased;
- Complying with the arrangements for emergencies as they have been instructed;
- Co-operating with management, colleagues, safety representatives and advisors promoting safe working practices;
- Keeping their work areas tidy and clear of hazards;
- Reporting accidents, incidents, near misses and any other hazards that they observe to their manager/supervisor;
- Drive safely at all times whilst undertaking company business;
- Reporting any concerns, they have relating to health and safety or welfare to their supervisor/line manager or the Group Health and Safety Team;

- Report any health condition that may or does affect their ability to work safely to their line manager or HR as soon as possible;
- Cease any work activity and leave any work area where a staff member/representative believes there is or senses immediate danger to themselves or others, this includes any doubt about the processes / procedures. Staff should stop activities and seeking clarification from the Group Health and Safety Team or review the risk assessment. Disciplinary action should not be taken against a member of staff who reasonably stops a work activity for Health and Safety concerns;
- Ensure the use of appropriate personal protective equipment, clothing or safeguards provided and as identified at risk assessment. Ensure that personal protective equipment is stored correctly and kept in good condition, reporting losses or defects to line management.
- Where an employee has been identified home-based agile They shall ensure they maintain a safe working environment within their home, in accordance with the Information, Instruction and Training provided to them.

4.14.2 Staff should not feel pressurised into carrying out work activities or tasks where they have not received the relevant training, or do not have the correct equipment to use or are not in possession of the required safety equipment.

4.14.3 Any health and safety concerns will be addressed through the management structure, initially to line managers or the Group Health and Safety Team. Thereafter appropriate investigation shall be undertaken in a timeous manner with appropriate action being taken.

4.14.4 All unresolved concerns/defects must be highlighted as soon as practicable to the Group Health and Safety Team. This can be done via line managers or directly via phone/email/in writing. ([#WheatleyHealthandSafety@wheatley-group.com/](mailto:WheatleyHealthandSafety@wheatley-group.com) )

4.14.5 Disciplinary procedures may be considered against staff that knowingly violate or fail to implement health and safety procedures or standards, or fail to use PPE or equipment provided for safety controls.

#### **4.15 Trade Union Safety Representatives**

4.15.1 The Group recognises the importance of staff involvement in Health and Safety matters and welcomes the positive role played by Trade Union safety representatives appointed under The Health and Safety at Work, etc. Act 1974, the Safety Representatives and Safety Committee Regulations,

4.15.2 Facilities and assistance will be provided to enable safety representatives to carry out their duties.

4.15.3 Arrangements for consultation and co-operation for Health and Safety of staff.

4.15.3 Management will consult with Trade Union Safety Representatives over issues related to health, safety and welfare and provide the information they require in order to carry out their functions.

- 4.15.4 Trade Union Safety Representatives are required to give management reasonable notice of their intention to carry out inspections, to provide written reports following such inspections and to adhere to agreed procedures when disputes over Health and Safety issues arise.
- 4.15.5 Management should consult with Trade Union Safety Representatives prior to staff moving into a new office/premise/location to ensure that they are satisfied with the standard of the new premises with particular reference to the welfare facilities and Health and Safety measures.
- 4.15.6 Management must co-operate with Trade Union Safety Representatives in the completion of Safety Representative Inspection Reports. It is most important that managers take a proactive role in dealing with the matters brought to their attention and that they conform to the necessary time scales.
- 4.15.7 Management must make arrangements to establish and actively encourage a Health and Safety structure to facilitate consultation and co-operation on Health and Safety in all areas of the organization.
- 4.15.8 The functions of the Safety Representatives under the terms of legislation and as applied by this policy are:
- To carry out inspections following reasonable notice, of the workplace every three months or immediately following notifiable accidents or dangerous occurrences;
  - To investigate potential hazards and dangerous occurrences in the workplace and to examine the cause of accidents at the workplace;
  - To investigate complaints by a staff they represent, relating to that staff health, safety and welfare at work;
  - To bring to the employer's notice, in writing, any unsafe or unhealthy conditions or working practices or unsatisfactory arrangements for welfare at work and;
  - To encourage safe practices among the staff they represent and promote the Health and Safety management system.

## Section 5 General Health and Safety Arrangements

### 5.1 Accident, Incident, Near Miss Reporting and Investigation

- 5.1.1 The Group's Accident, Incident and Near Miss Reporting procedures must be followed and recorded by the relevant manager and a copy provided to the Group Health and Safety Team.
- 5.1.2 The Operational Safety Manual (Section A) contains the Accident, Incident and Near Miss Reporting procedures and forms. These are available in hard copy and electronically via the Health and Safety page of WE Connect.
- 5.1.3 All serious accidents, incidents and dangerous occurrences will be further investigated as necessary, to identify the cause and to prevent a recurrence. This will be by line managers and the Group Health and Safety team when determined as required/necessary.
- 5.1.4 The Group has a duty to ensure that when an accident, incident or near miss falls within the RIDDOR criteria (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) this is reported in accordance with the regulations guidelines. A report should be submitted within 15 days' maximum for an over 7-day absence category and without delay for a specified incident or fatality, not exceeding 10days.
- 5.1.5 There will be occasions when the HSE determine they wish to carry out an investigation and notification of this will be via the Group Health and Safety Team or by their arrival on site if it in response to a fatality or immediate dangerous concern.
- 5.1.6 Individuals who wish their trade union or employee representative informed specifically or to have them investigate an incident must sign a mandate or permission confirmation prior to full information being provided. Suitable arrangements will be put in place to inform the appropriate trade union or employee representative of reported incidents and this will take account of GDPR.

### 5.2 Alcohol, Drugs and Gambling Addiction

- 5.2.1 The Group recognises that those staff who misuse alcohol, drugs and gambling where it impairs their work performance, conduct or relationships at work, may also impact on a safe and healthy working environment.
- 5.2.2 The Group will continue to promote and support the health and wellbeing of staff to minimise problems at work arising from the effect of alcohol, drugs or gambling addictions.

Please refer to the relevant HR policies for further information.

### 5.3 Asbestos

- 5.3.1 The Group acknowledges the health hazards associated with asbestos arising from exposure to asbestos and will take the appropriate measures to reduce exposure so far as reasonably practicable through the use of control measures and specialist contractors. Management procedures will include the following:
  - Managing or removing asbestos in premises under the control of the Group;

- Assessing/ inspecting all reasonably accessible areas in properties under the control of a Group subsidiary when acquired and/or where there has been a significant change since a previous assessment;
- Reviewing plans for control of asbestos at regular intervals;
- Maintaining a written record of inspections, assessments, location/ condition of asbestos found and plans for on-going control (asbestos register).

5.3.2 Managing Directors, Directors and Managers including Supervisors and Team Leaders are required to read and familiarize themselves with the Group Health and Safety Management Arrangement: and complete the Group Health and Safety Awareness and Asbestos Awareness course which includes guidance and information on managing and preventing possible exposure of asbestos.

Please refer to the Group Health and Safety Management Arrangement: Asbestos, which can be found on W.E. Connect, for further information.

## 5.4 Construction, Design and Management

5.4.1 All building and construction work (including new build, demolition, investment refurbishment, extensions, conversions, repair and maintenance work) undertaken by or on behalf of the Group must comply with The Construction (Design and Management) Regulations (CDM Regulations). The relevant Group subsidiary is responsible for compliance with the CDM Regulations, including oversight of the Principal Designer and Principal Contractor roles (carried out by third parties). Note that where no third party is appointed to carry out these roles, the responsibility for the fulfillment of these roles lies with the Group subsidiary instructing the works.

5.4.2 The CDM Regulation requirements include the following:

- Managing construction projects throughout the lifespan of the project, as reasonably practicable, without risk to health or safety of any person affected by our construction projects;
- Providing pre-construction information to contractors and designers (including asbestos);
- Carrying out initial due diligence prior to appointment and ongoing oversight of Principal Designers and Principal Contractors until project completion to ensure they have the skills, knowledge, experience and organisational capability to fulfill their role under the CDM Regulations in a manner that secures health and safety of any person affected by the relevant project;
- Ensuring that a health and safety file for each project is established and retained by/ on behalf of the relevant Group subsidiary as necessary;
- Ensuring the Principal Contractor produces a construction phase plan for each project prior to commencement of construction;

- For projects consisting of 30+ days' construction and 20+ workers on site / construction to exceed 500 person days, notifying HSE prior to commencement of the construction phase;
- Ensuring safe access to and egress from construction sites; the site is made safe for workers (taking account of traffic routes, operation of equipment, fresh air, adequate lighting, welfare provisions and appropriate weather conditions) and is kept secure and in good order; and sufficient working space is made available to workers to enable them to carry out their work;
- Taking all practical steps to ensure stability of new or existing structures to prevent danger to any person;
- Ensuring that any demolition or dismantling works are planned and carried out in such a manner to prevent or minimise danger and documenting such arrangements;
- Ensuring that explosives are stored, transported and used safely and securely;
- Ensuring that all practical steps are taken to prevent danger to any person during excavations or in an area which has been excavated;
- Ensuring that sites are inspected and concerns are reported to the appropriate person;
- Ensuring that energy distribution installations are suitably located periodically checked and clearly signed in order to prevent unauthorised access giving rise to danger;
- Taking steps to prevent harm by drowning, fire or asphyxiation;
- Ensuring suitable and appropriate fire safety procedures and emergency procedures are in place.

Additional guidance on The Construction (Design and Management) Regulations can be found at the HSE website. <http://www.hse.gov.uk/index.htm>

## 5.5 Control of Contractors

- 5.5.1 Where contracts are to be awarded to third parties the Group Health and Safety Team in conjunction with procurement, responsible manager and technical specialist will be part of the process for reviewing whether contractors are competent to carry out the tasks required and can demonstrate safe systems of work.
- 5.5.2 For tendered contracts the contractors will be evaluated at prequalification or tender stage to ensure that the contractors are competent to carry out the task(s) required, and can demonstrate safe systems of work.
- 5.5.3 Where contracts are awarded under framework agreements the contractor's competence of the contractor(s) will be periodically reviewed based on risk assessment and review of their key performance indicators. Contractors who fail to meet the relevant health and safety performance requirements may be removed from frameworks.

- 5.5.4 Where contractors are directly awarded contracts their competence will be evaluated prior to contract award.
- 5.5.5 Contractors who fail to meet the relevant health and safety performance criteria will not be considered for future tenders and their contracts can be terminated. This will be a procurement process with the involvement of the Group Health and Safety team where appropriate.

## **5.6 Control of Substances Hazardous to Health (COSHH)**

- 5.6.1 To fulfill duties imposed by the Control of Substances Hazardous to Health Regulations, the Group will ensure that as far as is reasonably practicable no work is carried out which is liable to expose any staff or others to a product, chemical or substance hazardous to health unless a suitable and sufficient risk assessment has been carried out.
- 5.6.2 Exposure to hazardous substances will either be eliminated, avoided or, where this is not reasonably practicable, adequately controlled. Measures introduced to control exposure will be maintained and tested to ensure their continued effectiveness. In the hierarchy of control measures, personal protective equipment will only be provided as a last resort in controlling exposure to substances. Information, instruction and training will be given to staff likely to be exposed to substances hazardous to health.
- 5.6.3 Any proposed purchase of a hazardous chemical or substance (that does not appear on the approved list of hazardous substances/chemicals) must be referred to the Group Health and Safety Team for assessment.
- 5.6.4 Information, instruction and training will be given to staff that may potentially be exposed to substances hazardous to health. Relevant procedures are contained in the Operational Safety Manual.
- 5.6.5 Staff who routinely work with hazardous substances may be required to undertake routine health surveillance to ensure their health is not being adversely affected.

## **5.7 Display Screen Equipment (DSE)**

- 5.7.1 The Group will take all reasonable steps for the Health and Safety and welfare of staff designated as "users" i.e. those who work with display screen equipment, (DSE) for prolonged periods of time.
- 5.7.2 Initial assessments should be made at the commencement of employment and thereafter, will be reviewed if there is significant change to the individual user, the tasks they perform or the workstation.
- 5.7.3 Annual review of users will take place via self-assessment documentation or e-learning to identify potential issues and assistance will be provided by the Group Health and Safety team upon request by managers of member of staff.
- 5.7.4 The work routine of staff falling within the definition of "user" will be planned to ensure that there are no continuous periods of display screen work. Staff will be entitled to corrective glasses where these are identified via eye and eyesight test as required for DSE work.

- 5.7.5 Staff will be given appropriate training and information about Health and Safety at the workstation, to enable the safe use of DSE.
- 5.7.6 Home based Agile Workers shall require to implement the Group Homeworking Arrangements and ensure a Homeworking Assessment is completed that addresses the needs of working with DSE at home. Further information on arrangements to be completed for all Home Based Agile Workers can be found in the health and safety pages of WE Connect.

Relevant procedures are contained in the Operational Safety Manual.

## 5.8 Electricity at Work

- 5.8.1 Work on electrical equipment and systems can be hazardous and the Group will control any risks so far as is reasonably practicable.
- 5.8.2 Under The Electricity at Work Regulations, the employer must assess the work activities which utilise electricity, or which may be affected by it, and to define all foreseeable associated risks. The Group will ensure that electrical equipment and systems are properly constructed, installed and maintained and that installations are suitable for the environment in which they are used.
- 5.8.3 All persons carrying out electrical work will be competent for the tasks assigned to them.
- 5.8.4 Suitable protective equipment will be provided where necessary and maintained in good condition.
- 5.8.5 All staff have a responsibility to report obvious electrical hazards immediately to line management. This equipment must be withdrawn from service until repaired or replaced.
- 5.8.6 Portable Appliance Testing (PAT), Fixed Installation Testing (FIT) and Emergency Lighting testing will be undertaken by competent persons. Only a contractor appointed by the Group will carry out maintenance and testing work involving electrical equipment.
- PAT (Portable Appliance Testing) will be undertaken on a three (3) year rolling cycle or risk based frequency;
  - FIT (Fixed Installation Testing) will be undertaken every five (5) years for all relevant premises; and
  - Emergency lighting shall be tested annually;
  - Maintained in appropriate log books on site and where relevant on the Asset Management system
- 5.8.7 Records will be available on request.

Relevant procedures are contained in the Operational Safety Manual.

## 5.9 Fire Safety

5.9.1 The safety of life must supersede all other considerations.

5.9.2 The Group approach to fire safety is primarily one of fire prevention and life preservation. The Wheatley Group Fire Safety Management Policy arrangement will provide detailed systematic measures for fire safety management.

- Fire risk assessments will be carried out for all relevant premises and some domestic premises by the Group Health and Safety Team and Fire Safety Team.
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- Fire risk assessments shall be reviewed regularly, or when there is a significant change to the building or its use, in order that risks are controlled and fire safety arrangements are implemented;
- Measures will be put in place in order that fire can be detected within a reasonable time frame and occupants alerted;
- People who may be in the building can get out quickly and safely;
- Staff in the building know what to do if there is a fire and have suitable and sufficient emergency procedures;
- Staff and visitors with special needs will be offered a personal emergency evacuation plan (PEEP) which will be developed in consultation with the individual and team members;
- There is adequate provision of maintained firefighting equipment;
- It is a legal requirement that all staff receive suitable fire safety awareness training, they shall receive this upon commencement of employment and then three (3) yearly;
- Staff have a duty to report any concerns in relation to fire safety to their line Manager or the Group or subsidiary Health and Safety Team;

5.9.3 The Group's responsibilities to meet the provisions of the Fire (Scotland) Act 2005 and the Fire Safety (Scotland) Regulations are set out in The Wheatley Group Fire Safety Management Arrangement.

Relevant procedures are contained in the Operational Safety Manual and the Fire Safety Management Arrangement.

## 5.10 First Aid at Work

- 5.10.1 The Group will provide information and training on first aid to staff, based on risk assessment, to ensure that statutory requirements and the needs of the Group are met.
- 5.10.2 Via a process of risk assessment the Group will have sufficient provision of trained first aid persons and equipment where necessary.
- 5.10.3 All first aid treatment delivered will be recorded using the appropriate documentation contained within the Operational Safety Manual and on the Wheatley Group LMS (Learning management system).
- 5.10.4 Homeworkers shall ensure that they complete Introduction to First Aid Training on a regular basis as part of the Group Homeworking arrangements

Relevant procedures are contained in the Operational Safety Manual.

## 5.11 Gas Safety

- 5.11.1 There is a responsibility to ensure effective gas management is in place which ensures legal compliance. This system will include procurement, safe installation, inspection, maintenance and monitoring regimes with regards to gas systems within premises owned and managed by The Group.

Please refer to the Wheatley Group Health and Safety Management Arrangement: Gas Safety and procedural documentation for specific requirements and further information.

## 5.12 Health and Safety Induction, Instruction and Training

- 5.12.1 All staff will receive a formal induction to the Group as part of the commitment to the health and safety of staff. This induction covers Health and Safety information as undernoted:
- There is a Group Health and Safety Team for support, guidance and advice;
  - The Health and Safety management system in place comprises The Wheatley Group management arrangements and the specific procedures within the Operational Safety Manual. This is available in hard copy on each site and electronically on the Health and Safety page on WE Connect;
  - All staff must complete a site/task specific Health and Safety Induction document on starting work in a new location delivered by their manager;
  - Legally all accidents, incidents and near misses must be reported by staff; and
  - Staff must report any serious risk to Health and Safety to a manager as soon as possible.
- 5.12.2 Health and Safety, Fire Safety and subject specific training along with tool box talks will be provided by the Wheatley Group Health and Safety Team. Where necessary specialist subject training will be provided by external, competent contractors. Training records will be retained within the Learning Management System which is managed by the Wheatley My Academy

staff. Wheatley My Academy staff will also support any e-learning developments in conjunction with the Wheatley Group Health and Safety team.

- 5.12.3 Training helps to ensure the competency of management and key personnel. Where specialist training is required competent, accredited external providers will be appointed.

### **5.13 Homeworking**

5.13.1 The Group recognise that most of the work that staff would undertake at home is based around work on a computer, tablet and telephone/mobile phone, and as such not considered high risk.

5.13.2 However, the Health and Safety at Work Act 1974 places a duty on employers, self-employed people and employees when acting in the course of their employment whether at home, in the office or in our communities.

5.13.3 The Group recognise that there is a duty to protect the health, safety and welfare of our employees, including Home Based Agile Workers.

5.13.4 In order to ensure this duty is fully met, all employees who are deemed Home Based Agile Workers must complete a home worker self-assessment and all associated mandatory training modules, as identified by the Group.

5.13.5 Line Managers shall therefore ensure that aforementioned Homeworking arrangements to include the provision of Occupational Health and Wellbeing support is maintained for all Home Based Agile Workers.

### **5.14 Infection Prevention & Control**

5.14.1 The Group recognises the benefits of controlling possible rates of transmission of infections in the workplace to staff, customers and service users. This will be addressed through all staff adopting appropriate precautions, consistently and responsibly in their day-to-day practices and in line with current NHS and Public Health Scotland Guidelines.

5.14.2 The precautions should help reduce or prevent the spread of the majority of infections, particularly blood borne pathogens and viruses, such as Hepatitis B, Hepatitis C, Coronavirus and Human Immunodeficiency Virus (HIV) as well as bacterial infections such as MRSA.

5.14.3 The Group recognises that some staff will encounter sharps (needles) in the course of their normal work activities.

5.14.4 To minimise the risk of a sharps injury staff will be provided, based on job their role, with:

- Training on the avoidance of sharps, and;
- Training on the safe collection and disposal of used sharps;
- Relevant procedures are contained in the OSM;

### **5.15 Legionella**

5.15.1 The Group recognises the risk of infection from Legionella bacteria and will take all reasonable steps to implement an appropriate health and safety management system for water systems within premises to ensure that the necessary measures to prevent, or adequately control, the risk from exposure to Legionella bacteria.

5.15.2 The management system for Legionella will:

- Identify hazards and assess sources of risk – this includes checking whether conditions are present which will encourage bacteria to multiply, if there is a means of creating and disseminating breathable droplets, and if there are susceptible people who may be exposed to the contaminated aerosols;
- Prepare a scheme for preventing or controlling the risk;
- Implement, manage and monitor precautions; and
- Keep records of the precautions on appropriate asset management register;

## 5.16 Lifting Operations and Lifting Equipment

5.16.1 The Group recognises that it has a duty to reduce the risks to staff and others from lifting operations. In order to assist Wheatley Group in discharging this duty, all managers must make sure that all lifting equipment provided for work use is appropriate:

- Suitable and sufficient for the tasks/operations
- Strong and stable enough for the particular use and marked to indicate safe working loads:
- Positioned and installed to minimise any risks;
- Used safely, i.e. the work is planned, organised and performed by competent people; and
- Subject to on-going thorough examination, and where appropriate, inspection by competent people;
- Staff receive all appropriate training required.

## 5.17 Lone Working

5.17.1 The Group recognises that lone workers can at times face particular difficulties and will as such not require staff to work alone where a risk assessment considers there is an unacceptable risk, and will make arrangements to ensure that all lone workers are appropriately trained:

5.17.2 In addition lone working procedures will be developed in accordance with risk assessments and managers must implement and monitor these procedures with their staff group as meets the needs of their activities.

5.17.3 All staff will be provided with information and instruction with regards to lone working procedures during induction and through Health and Safety Awareness Training.

Relevant procedure are contained in the Operational Safety Manual

## 5.18 Manual Handling

5.18.1 It is recognized that Manual Handling is one of the most common cause of injury and multiple absences and where possible must be avoided so far as reasonably practicable.

- Where it is not possible to eliminate hazardous manual handling, risk assessments will be undertaken to determine the level of risk;
- Suitable controls will be introduced to reduce the risk of injury, including training, mechanical aids, automation, redesigning the system of work or even the workplace itself;
- In some cases Manual Handling assessments will be included into other task/activities/job profile risk assessments;
- Where required specific manual handling assessments will be undertaken if not included as part of other risk assessments. These will be recorded and shared with appropriate managers and staff.

Relevant procedures are contained in the Operational Safety Manual.

## 5.19 Medication (Management and Administration)

5.19.1 The Group recognises that today's medicines are powerful compounds that control disease, ease discomfort and prolong life for millions of people and are generally beneficial.

5.19.2 Group subsidiaries that are responsible for management and administration of medicines to people, be they young or old, healthy or sick, will follow a set of general principles to make sure that this is done safely and will make a structured approach in order that Management and Staff can apply consistent and effective practices in respect of the management of medication.

5.19.3 Relevant Group subsidiaries shall have their own specific procedures relating to this matter that will ensure that the procedures are relevant to that particular Group subsidiary and meet regulatory standards and practices. These will be included in the OSM.

## 5.20 New and Expectant Mothers

5.20.1 The Group recognises risks associated with working operations that may pose risk to a new or expectant mother or to that of her baby, and will ensure sure that decisions on how to manage those risks are made in an informed, rational and structured manner as determined by a specific Risk Assessment. This will ensure the workplace / activities are:

- Safe, i.e. the work is planned, organised and reviewed as a matter of course as pregnancy develops or new mother returns to work.

Relevant procedures are contained in the Operational Safety Manual.

## 5.21 Noise

- 5.21.1 The Group will take all reasonable steps to ensure that the risk of damage to hearing for staff who work with noisy equipment or in a noisy environment is reduced to a minimum.
- 5.21.2 Noise assessments will be carried out to determine the level of the problem and appropriate controls implemented.
- 5.21.3 Methods of reducing noise levels and/or exposure times will be implemented as alternatives to personal protective equipment. Ear defenders will be provided only as a last resort as means of controlling exposure to noise. Testing for Noise Induced Hearing Loss will be conducted for "at risk" groups by the Occupational Health Provider and be included in a health surveillance programme.

## 5.22 Occupational Health and Wellbeing

- 5.22.1 The Group recognises the importance of good staff health in relation to both work performance and a fulfilling active life outside of work.
- 5.22.2 Preventing or reducing work related ill health and stress ensures staff do not experience physical or mental injury or harm as a direct result of work activities and the Group will comply with legal requirements.
- 5.22.3 It is recognised that shift or irregular working patterns may have an impact on health. To mitigate this, industry good practice processes have been established. This is reflected in the safety management system and provided through occupational health surveillance.
- 5.22.4 The Group enhanced health benefits which are offered to staff includes a suite of health services and a generous cash-back scheme to help with the costs associated with treatments.
- 5.22.5 The Health and Wellbeing Plan contains information on eligibility criteria for The Group and its subsidiaries.
- 5.22.6 A comprehensive occupational health service and employee assistance programme is available to all Group staff, and includes:
- A 24 hour telephone advisory service, face-to-face counselling sessions and post incident de-briefing. This also includes support telephone services for staff, covering such areas as; Anxiety, Stress, Harassment, Work Related Issues/Stress, Bereavement, Debt Counselling / Management, Family Problems, Personal Problems, Marital Problems, Anger Issues, Violence, Illness, Personal Self Esteem/Confidence, Alcohol/Drug Misuse, Health, Depression and Mental Health.
  - Pre-employment, night worker and driver questionnaires;
  - Medical screening for staff exposed to specific occupational hazards such as noise or hand arm vibration;
  - Relevant health surveillance for work activities including provisions under Employment Law;

- Provision of advice and counselling on problems of a medical nature;
- Occupational health service appointments on request for staff where appropriate;
- Advice on medical aspects of activities undertaken by the Wheatley Group and its subsidiaries,
- Physiotherapy service.

### **5.23 Personal Protective Equipment (PPE) and Respiratory Protective Equipment (RPE)**

5.23.1 The Group will provide suitable and sufficient PPE where risks cannot be removed or adequately controlled by other means. It is introduced as a last resort; The Group is committed to reducing risk by alternative means so far as is reasonably practicable.

5.23.2 PPE/RPE purchased by The Group will comply with the appropriate British/European standards.

5.23.3 When PPE/RPE is to be provided as a control measure, The Group will, in consultation with staff and their representatives:

- Carry out an assessment to determine what risks exist and therefore what PPE & RPE is required;

The Group will provide storage/training and maintenance of PPE & RPE; it will also replace PPE/RPE, which has been provided as a control measure, as necessary;

- PPE/RPE will be suitable for the activities and environments and will be compatible with other items of PPE or RPE not impairing the intended/inherent effectiveness of all PPE/RPE items;

5.23.4 Requirements for PPE/RPE are based on an evaluation of risk and on job role and in case of RPE the person, and these are contained within the Operational Safety Manual.

### **5.24 Risk Assessment**

5.24.1 The Group has identified Health and Safety hazards relevant to the business, assessed the risk and recognise the importance and requirement for control measures to eliminate or reduce the risk of incident, injury or ill health occurring.

5.24.2 The information with regards to appropriate procedures and control measures are contained in relevant guidance documents and risk assessments

5.24.3 Risk assessments will be conducted for activities, for all job profiles and these will be reviewed on an ongoing process.

5.24.4 The Group risk assessments process will involve management, staff and health and safety representatives and is aimed at providing effective control measures for significant hazards.

## 5.25 Safety Signs and Signals

- 5.25.1 All safety signs and safety signals used within the Group will comply with The Health and Safety (Signs and Signals) Regulations.
- 5.25.2 Appropriate safety and/or warning signs must be provided and maintained especially where risks identified by risk assessment cannot be controlled by other means. Comprehensive and relevant information, together with instruction and training relating to safety signs will be provided to staff.

## 5.26 Security Threats

- 5.26.1 All Managers who are responsible for a premise will organise security and emergency evacuation strategies, taking security threats into account. Information and guidance on specific plans and arrangements can be found in the business continuity, emergency and contingency plans. These are tested and maintained on an annual basis.
- 5.26.2 All managers are responsible for the security of their building which should include arrangements for bomb threats, fires, intruders and other potential security issues.

## 5.27 Smoke Free Workplace

- 5.27.1 The Smoke Free Workplace seeks to guarantee staff the right to work in air free of tobacco smoke, The requirements of the Management of Health and Safety at Work Regulations and the Workplace (Health, Safety and Welfare) Regulation's also place stringent requirements on employers to assess risks and make sure that non-smokers are protected from the dangers of tobacco smoke whilst at work,
- 5.27.2 The Smoking, Health and Social Care (Scotland) Act and the Prohibition of Smoking in Certain Premises (Scotland) Regulation's prevent staff, customers and visitors from smoking in wholly or substantially enclosed premises.
- 5.27.3 Group Directors, Managing Directors, Directors, Senior Management, Managers and Team leaders will be responsible for enforcing the Smoke Free Workplace Policy within their respective areas. It is the responsibility of all staff to comply with the terms and conditions of this policy.

## 5.28 Stress

- 5.28.1 The Group recognises that, whilst a degree of pressure can be a positive and driving force at work, excessive and continuous pressure can have a negative effect on health and performance at work.
- 5.28.2 The Group is committed to promoting good health at work and to provide suitable support mechanisms for staff who may be suffering from the effects of stress.
- 5.28.3 Stress risk assessments can be arranged via Employee Relations with the objective of reducing harm from stress so far as is reasonably practicable.

5.28.4 The Group will so far as is reasonably practicable ensure that excessive pressures are identified and eliminated or controlled in the work environment and that the necessary risk assessments are completed and control measures progressed reducing workplace stressors.

5.28.5 To assist in this process The Group will:

- Provide suitable support mechanisms for staff suffering from the effects of stress;
- Encourage a working environment where staff who feel they are suffering from the effects of stress can approach their managers in confidence, in order that necessary support mechanisms can be put in place;
- Encourage a culture where stress is not seen as a sign of weakness or incompetence;
- Ensure adequate rehabilitation and support for staff returning to work after a period of absence due to stress;
- Offer suitable training to enable staff and managers to recognize symptoms of stress, the effects of stress at work, effective communication, handling difficult situations, time management and employee relations;
- Undertake general health promotion activities within the workplace; and
- Where staff are suffering from stress, the Group will provide the necessary mechanisms to promote a return to full health as quickly as possible. Staff are encouraged to seek assistance from their line manager, senior management and/or our Employee Assistance Programme (EAP).
- Any contact will be dealt with in complete confidence. Staff will be offered any relevant counseling, help with stress reduction techniques and a full appraisal of their work situation.

## 5.29 Transport Safety

5.29.1 The Group has a responsibility to manage the risks encountered by staff while driving as part of their duties. This applies to anyone who drives on behalf of The Group, whether they are employed directly or indirectly, including staff using their own private vehicle for business (grey fleet) to staff operating dedicated works vehicles.

5.29.2 Managing workplace transport safety usually involves controlling a wide range of linked areas including vehicle safety, driving, loading/unloading, a person's competence, towing, reversing, etc. The Group will provide and maintain information/insurance/instruction and training as required.

Refer to The Wheatley Group Safe Driving Policy for further information.

## 5.30 Vibration

5.30.1 The Group recognises that occupational exposure to vibration can cause discomfort and adverse health effects.

- 5.30.2 Hand-arm vibration syndrome (HAVS) is the term used to describe the injuries caused by the prolonged use of hand-held power tools and is recognised as a reportable disease within the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
- 5.30.3 The Group recognizes the requirements of the control of Vibration at Work regulations and will take all reasonable steps to ensure that the risk of injury to staff who work with vibrating machinery is appropriately controlled by elimination or risk reduction measures.
- 5.30.4 The Group has developed appropriate procedures and risk assessments in respect of tools and equipment used by staff in order to minimise the potential for any exposure to hand/arm vibration.
- 5.30.5 The Group will have a strict purchasing strategy in relation to tools and equipment which may expose staff to vibration. There will be competent persons designated to assess vibration levels of equipment (current and/or sample) to ensure levels are within safe limits.
- 5.30.6 All staff who are exposed to risk from vibrating equipment will undergo routine health surveillance. Testing for Vibration Induced Disorders will be conducted for "at risk" groups by the Occupational Health Provider. All data relating to Health Surveillance will be held by the Occupational Health Provider and Employee Relations.

Relevant procedures are contained in the Operational Safety Manual.

### **5.31 Violence at Work (Challenging behaviour and Aggression)**

- 5.31.1 The Group does not accept that it is part of any member of staffs' duty to be subjected to verbal abuse, threats, harassment on social media or physical assault.
- 5.31.2 When and if such abuse is experienced by staff, the relevant Subsidiary will provide personal support and guidance as is necessary to the staff to ensure that the effect of such abuse is minimised.
- 5.31.3 The Group provides a range of services to the community with the expectation that our staff will be treated with courtesy and respect.
- 5.31.4 Where a staff member is the victim of verbal abuse, harassment, threats or physical assault delivered by a member of the public or a fellow member of staff, appropriate action will be implemented against the offender(s) as outlined within the relevant Unacceptable Actions Policy. It should be made clear to all customers, service users and clients that violence and aggressive behavior is unacceptable and will not be tolerated.
- 5.31.5 Staff are required to report to their manager/supervisor incidents of violent, threatening or abusive behaviour to which they have been subjected. All incidents should be reported using the procedure highlighted in OSM section (A) Accident, Incident, Near Miss Reporting and Investigation.
- 5.31.6 It is recognized that within the care sector environment that challenging behaviours and violence exists. Appropriate training will be identified and provided to staff to allow them to develop confidence and competence to manage situations and circumstances where challenging behavior and violence may occur.

5.31.7 The Group has a duty to ensure that when an accident or incident falls within the RIDDOR criteria (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) this is reported in accordance with the regulations guidelines.

Relevant procedures are contained in the Operational Safety Manual.

### 5.32 Working at Height

- 5.32.1 The Group recognises the significant risks to Health and Safety presented by all work at height.
- 5.32.2 In line with the hierarchy of controls any working at height will be avoided where possible work equipment or other measures to prevent falls designed to minimize assistance and consequences will be in place following risk assessment.
- 5.32.3 Group managers must ensure a risk assessment for working at height is carried out, that any work at height is properly planned, appropriately supervised and carried out in as safe a way as is reasonably practicable. Advice is available from the Group Health and Safety Team. All parts of the risk assessment/control measures must be communicated to staff with all appropriate training and instruction provided.
- 5.32.4 All equipment/machinery and PPE provided for working at height purposes / activities will be subject to relevant maintenance and servicing in accordance with regulatory guidance.

### 5.33 Work Equipment

- 5.33.1 The purchase, use and maintenance of work equipment by the Group and its subsidiaries shall at all times be in line with the requirements of The Provision and Use of Work Equipment Regulations (PUWER).
- 5.33.2 As directed, managers/supervisors will be required to provide the necessary information, instruction and training to staff under their supervision, in order that work equipment is suitable for the purpose of use and information on how it should be safely used provided.
- 5.33.3 Examinations, regular maintenance, inspections and tests should be carried out by competent, accredited maintenance contractors to ensure work equipment is maintained in an efficient state, in efficient working order, and in good repair, with records maintained and monitored to ensure compliance.
- 5.33.4 If necessary, managers must seek advice from the Group Health and Safety team to ensure their responsibilities are met.

### 5.34 Workplace Welfare

- 5.34.1 The Group recognises that a safe working environment is a requirement and will ensure:
- A safe working environment is maintained in all areas/subsidiary through effective monitoring , which will include Health and Safety inspections and audits;
  - It will ensure maintenance of workplace, work environment such as heating, lighting and ventilation; devices and systems, floor conditions, traffic management and noise by providing information, instruction and monitoring.

## 5.35 Operational Safety Manual

- 5.35.1 The Group Operational Safety Manual forms the basis for the ongoing management and control of health and safety. The details within the Operational Safety Manual describe the requirements under law to which the Group will comply. These responsibilities are shared amongst Directors and Managers across the Group.
- 5.35.2 The OSM will be made available to all Group subsidiaries and is tailored to the risks and activities undertaken by each subsidiary within the specific workplaces they occupy.
- 5.35.3 The OSM comprises the following sections, tailored to the subsidiary and function within each workplace, for example:
- Accidents, Incidents and First Aid
  - Fire and Emergency Procedures
  - Procedures and Risk Assessments
- 5.35.4 The Group and its subsidiaries have developed a number of safe working procedures/guidance documents and associated risk assessments covering specific work activities.
- 5.35.4 Group Operational Safety Manuals (OSM's) will be updated as required and at periods of not more than 3 years to ensure legal compliance and changes in work practices. These documents shall be made available in the Operational Safety Manuals and electronically to all persons employed by Group subsidiaries

## Section 6 Health and Safety Monitoring

### 6.1 Health and Safety Operations Meeting

- 6.1.1 The Group's Health and Safety Operations Meeting relating to key functions (e.g. housing, care, NETS and in-house trades teams) will meet on a quarterly basis to monitor health and safety.
- 6.1.2 The meetings will consist of a cross section of staff from across the organisation including union representatives and will be chaired by the Group Health and Safety Lead. The purpose of these Groups is to facilitate joint participation in Health and Safety matters to enable management and staff to exchange views and to reach a better understanding on all matters and procedures related to Health and Safety Management System.
- 6.1.3 The remit of the Group is:
- To consider all Health and Safety matters on an operational, day-to-day basis;
  - To study statistics and trends of incidents so that reports can be made to management on unsafe and unhealthy conditions and practices, together with recommendations for corrective action;
  - To consider reports which management representatives or safety representatives may wish to submit; and
  - To recommend visits/inspections of Group premises.

### 6.2 Health and Safety Strategy Meeting

- 6.2.1 The Group Health and Safety Strategy Meeting will meet on a quarterly basis following the Group Health and Safety Operations Meeting.
- 6.2.2 The Group's Health and Safety Strategy Meeting will consist of Directors / senior managers supported by technical personnel and will be chaired by the Director of Assets and Sustainability with the following remit:
- To consider the Wheatley Group Health and Safety Policy and associated management arrangements and procedures;
  - To monitor the implementation of The Wheatley Group Health and Safety Policy and associated management arrangements and procedures;
  - To review The Wheatley Group Health and Safety Policy to comply with new legislation and changes to the Group, and otherwise annually;
  - To develop, manage and review the strategic health and safety risks experienced by the Group;
  - To develop and implement the Group's Health and Safety Strategy;

- To review the management information in relation to accident and incident statistics including near misses to identify trends and establish action plans to address them;
- To review the outcomes of Health & Safety audit reports and monitor completion of audit actions. This will be on a quarterly basis and as and when required; and
- To review Health and Safety performance across the Group and report performance to Executive Team, Group and subsidiary boards. This will be on an annual basis or as and when required.

### **6.3 Assurance**

- 6.3.1 A continuing process in the effective monitoring of the Group's Health and Safety management system ethos is the requirement that the performance of the Health and Safety Management System operated by the Group confirms effective statutory compliance and the continuing Health, Safety and Wellbeing of our staff.
- 6.3.2 Health and Safety Audits will be conducted by the Assurance Team and supplemented by external competent personnel as required. Outcomes of audits will be sent to the Chief Executive and detailed recommendations made. Once senior management has accepted the audit recommendations, an action plan with realistic targets will be developed in line with the Delivery Plan. The Group Health and Safety Strategy Group will monitor completion of audit actions. These actions will be followed up by the Group Assurance Team in conjunction with the Director of Group Assets and Sustainability and the Group Health and Safety Lead where required.
- 6.3.3 Trade Union safety management will be consulted as part of the audit. On completion of the action plan a copy of the Health and Safety Audit will be made available to the appropriate Trade Union safety representatives.

## Section 7 Policy Review

- 7.1 This policy shall be reviewed every 2 years however regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance. Reviews will consider legislative, performance standard, good practice and organisational changes.
- 7.1.1 The Group will publish this policy on our staff [intranet](#) site W.E. Connect and on our website. A hard copy is also available on request. Customers may also request a copy of the policy in other formats and community languages.

## Section 8 Relationship to other policies

8.1 This policy should be read in conjunction with the following documents which can be found on the staff intranet W.E. Connect:

HR: Code of Conduct  
Social Media Policy  
Alcohol, Drugs and Gambling Addiction Policy  
Unacceptable Actions Policy  
Dignity at Work Policy  
Harassment and Bullying at Work Policy

HS: All Group Health and Safety Policies

All Group Health and Safety Management Arrangements

## Section 9 Document Control policies

Version	Date of Issue	Issued By	Authoriser	Comments
1.0	30 <sup>th</sup> September 2018	Group Health and Safety Manager	Director of Group Assets	1 <sup>st</sup> issue revised structure
1.1	01 <sup>st</sup> December 2021	Group Health and Safety Lead	Director of Assets and Sustainability	Review Consideration of Group Restructure, operating model and update regarding Homeworking and Lone Working