



POLICY DOCUMENT

Group Member: Progress Housing Group

Service Area: Health & Safety

Document Ref No: GRPOLHS01

Subject Title: Health and Safety Policy

Version: 20

Effective Date: 01/07/1997

Last Reviewed: 31/07/2024

Next Review Date: 31/07/2025

Document Owner: Head of Health & Safety

Date of approval 31/07/2024

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STATEMENT OF INTENT

Progress Housing Group fully acknowledges that successful health and safety management contributes to the overall performance of the Group and that it makes good business sense. The Group is committed to complying with all relevant health and safety legislation applicable to its undertaking, including as an employer, a provider of services and a social landlord, and to the continuous improvement of health and safety performance.

The Group is committed to promoting a positive health and safety culture and to the health and safety of its colleagues and others affected by its undertaking, including tenants, customers, communities, contractors and partners and will do all that is reasonably practicable to reduce risk, prevent harm and ensure that safe working practices are adopted. This commitment is implicit within our vision and values and shown through associated risk assessments, related policies, procedures, guidance and other operational control measures.

The Group will ensure that all necessary resources are made available to implement this strategy effectively and achieve these commitments through its health and safety policy and improvement plans, and will act swiftly to resolve any concerns or issues that may be raised in relation to any other health and safety matter.



Jacqui De Rose
Group Chief Executive
Progress Housing Group

August 2024

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1. INTRODUCTION

1.1 Health and safety (HS) legislation requires the Group to put in place arrangements for the effective planning, organisation, control, monitoring and review of health and safety. As a minimum, the Group will:

- have a written HS policy;
- have access to competent HS advice;
- undertake and record 'suitable and sufficient' assessments of the risks to employees and other people who could be affected by its activities;
- have arrangements for managing the control measures that arise from risk assessments;
- consult employees about their risks at work and measures taken to protect them;
- provide employees with information, instruction and training about the risks and control measures;
- ensure there is adequate and appropriate supervision in place.

1.2 The Regulator for Social Housing (RSH), as part of the Consumer Standards, also requires the Group to take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas and communicate in a timely manner with the RSH on all material issues that relate to non-compliance or potential non-compliance with the consumer standards.

1.3 This policy document is designed to set out our obligations in meeting statutory requirements and to demonstrate the Group's commitment to HS.

2. SCOPE OF THE POLICY

2.1 This policy is applicable to all Group colleagues, directors and board and committee members; it is also relevant to partners, contractors, customers, visitors and members of the public in respect to how the Group's undertaking may affect them, with exception to:

- 2.1.1 Key Unlocking Futures Limited as it has its own HS policy that is closely aligned to this policy, and involves participation in the Group's HS Committee and implementing its arrangements for

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HS. Different training arrangements apply for Key trustees and volunteers.

2.1.2 The Leeds Independent Living Accommodation Company Limited (LiLAC) has separate HS arrangements in relation to the buildings managed by the Group, however, as landlord, the Group retains its responsibilities to tenants and so the policy applies on that basis.

2.2 The Group expects its partners and contractors to work within the spirit of this policy and to have suitable arrangements in place to manage HS within their own company. There may be further explicit HS requirements within individual contracts and/or leases.

2.3 This policy is applicable to all properties and sites owned or managed by the Group, including those of its separate subsidiary companies.

2.4 Where properties are shared with others, such as at the maintenance supplier's (Berry's), the Group will work with all relevant parties to develop, implement and maintain shared HS arrangements.

2.5 Aims & Objectives

To achieve our policy the Group will, so far as is reasonably practicable:

- Ensure compliance with relevant legislation, and in particular the requirements for risk assessment and control.
- Meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas. Ensure that all required actions arising from legally required health and safety assessments are carried out within appropriate timescales.
- Ensure that the safety of tenants is considered in the design and delivery of landlord services and take reasonable steps to mitigate any identified risks to tenants.
- Ensure safe premises and places of work, including safe access and egress.
- Ensure that safe working environments and arrangements for colleague health and welfare are provided and maintained.
- Support colleague health and wellbeing opportunities.
- Ensure plant, equipment and systems of work are provided that are safe and without risks to health.
- Ensure suitable arrangements for safety in procurement.
- Ensure the safe and healthy delivery, handling, storage, use, transportation and disposal of articles, plant, equipment and substances.

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- Ensure suitable and sufficient information, instruction, training and supervision is provided as is necessary to ensure the safe performance of all their work activities, including that;
 - Managers receive appropriate HS training to discharge their responsibilities for health and safety.
 - Colleagues are informed of team/task based risks and control measures.

3. ORGANISATION

- 3.1 This section of the policy outlines the way in which the Group is structured for HS purposes and illustrates how its management framework operates in practice. It is based around the HSE's continuous improvement model for HS management (Plan, Do, Check Act (HSG 65)), as shown at Appendix 1.
- 3.2 The Group has a high level risk management compliance framework, as outlined in its Risk Strategy and Policy, which includes provision for HS and utilises the 3 lines of defence model, to ensure appropriate management and oversight, as shown at Appendix 2:
- 3.2.1 The Group supports external validation of its health and safety management on a regular basis, to provide an extra level of assurance.
- 3.2.2 Internally, HS is included within the "audit universe" so that assurance on HS compliance is provided to Audit Committee by internal audit, supported, where necessary, by independent external advisors. Continuous improvement in HS has regard to internal audit recommendations.
- 3.2.3 A separate HS Universe is also maintained and overseen by The HS Steering Group, to ensure all applicable areas of health and safety are identified and managed as appropriate.
- 3.3 An organisational structure chart for implementing the HS Policy is shown at Appendix 3.
- 3.4 Key health and safety responsibilities are shown at Appendix 4. Further and more specific details can be found within individual job descriptions/person specifications and on the intranet.
- 3.5 The Group employs a Corporate HS Team and a Property Compliance Team to provide for the requirement to appoint one or more competent people to assist it to implement measures needed to comply with HS requirements. The Teams utilise the services of

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further external specialist support where required. The benefit of having in-house provision is that this provides closer oversight of risks and issues and the teams can actively work with management to bring about the standards and any changes required, with the aim of improving HS performance and culture.

- 3.6 To demonstrate commitment to HS and to ensure HS risk and resource requirements are considered at the most senior level, the Head of HS reports directly to an Executive Director. Specifically this ensures that the Group's HS support remains independent and aligned to Group HS risk priorities and avoids the potential for conflicting demands from departmental HS priorities.
- 3.7 To ensure significant HS risk is appropriately addressed, the HS Team have defined work programmes and an operational improvement plan which focuses on significant (emerging) risks and improvement areas, and linked to the HS Strategy.
 - 3.7.1 As necessary, the Board will commission a working party, comprising of directors, non-executive directors and relevant officers, including the Head of HS, to focus on further emerging HS risks and issues or to review its expectations for health and safety.
- 3.8 The Parent Board formally oversee HS management on a six monthly basis when a report is presented providing relevant performance information, progress against the improvement plan and highlighting any changes to the Group's HS Policy, for approval.
- 3.9 As a registered provider of social housing, an additional HS regulatory framework exists which is enforced by the RSH. Here the Consumer Standards (Consumer Regulation) require registered providers to take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas and communicate in a timely manner with the RSH on all material issues that relate to non-compliance or potential non-compliance with the consumer standards. It is noted that in essence these standards reiterate the requirements of HSWA (S3).
 - 3.9.1 Within Property Services the Property Compliance Team oversees the strategic framework for compliance and statutory and regulatory requirements, including gas servicing, electrical testing, fire risk assessment, smoke and carbon monoxide alarm installations, legionella testing, asbestos management and the servicing of lifting equipment

3.10 Implementation and arrangements

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3.10.1 The Group's HS Strategy sets out the Group's position for HS and describes how we will achieve our aims and objectives to ensure that continuous improvement and the HS policy requirements can be achieved.

3.10.2 Separate HS procedures and guidance are in place to implement the HS arrangements.

3.11 Data Protection

3.11.1 Any data processed in relation to this policy will be done so in line with relevant legislative requirements for HS and the current data protection legislation and the Group's Data Protection Policy.

3.11.2 An impact assessment has been undertaken for the handling and management of data in connection with HS management. Further information is available from the Data Protection Officer upon request.

4. RESPONSIBILITY

4.1 This section of the policy outlines everyone's responsibilities and accountability for HS. A summary is provided in Appendix 4. Individual HS responsibilities are detailed in job descriptions/person specifications and on the intranet.

4.2 Responsibilities should not be regarded in isolation; everyone has a responsibility to co-operate and communicate with one another to ensure the HS Policy and its implementation can be effective and that we can maintain a positive HS culture.

4.3 Parent Board

Parent Board Members are expected to support the Group in demonstrating effective leadership for HS and have a duty to attend HS related training sessions relevant to their role.

Parent Board Members have a collective responsibility for setting the overall strategic direction for HS through its decision-making processes and a sensible risk management approach. It is specifically responsible for ensuring suitable and sufficient resources are available for the Group to discharge its responsibilities for HS.

The Parent Board will approve the HS strategy and this policy and oversee their implementation through the monitoring of HS performance and compliance. It expects that plans and priorities are

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correctly aligned to the degree that HS risk and performance information is provided that enables effectiveness of health and safety management monitoring, including data integrity, format, content, trends and frequency.

4.4 Group Chief Executive

The Group Chief Executive has overall responsibility for ensuring this HS Policy remains valid and is signed and implemented and that the Group complies with HS law, through her own decisions and by delegating authority to other Directors and Managers.

4.5 Executive Board

The Executive Board consists of the Group Chief Executive, the Executive Director (Finance & Corporate Services), Executive Director (Governance, People and Communications), Executive Director (Operations and Support) and Executive Director (RWP and Development). It is responsible for implementing the HS Policy, maintaining oversight of its performance and acting accordingly

4.6 Health and Safety Lead

The Group has named the Executive Director (Operations and Support) as its HS Lead and who will carry out the functions required by the Social Housing (Regulation) Act 2023.

4.7 Senior Leadership Team

The Senior Leadership Team consists of the Executive Team and Directors. The Senior Leadership Team are responsible for implementing the HS Policy and leading HS and ensuring compliance within their portfolio.

4.8 Directors of the Group's subsidiary companies

4.8.1 The Director (Development) is responsible for achieving all HS legislative requirements relating to Concert Living Limited.

4.8.2 The Director for Key Unlocking Futures, is responsible for achieving all HS legislative requirements as applicable to its undertaking as set out in its Health and Safety Policy.

4.9 Heads of Service, Manager and Team Leader responsibilities are set out in their HS responsibility statement. Job descriptions will also include health and safety responsibilities, as they are refreshed. Additionally, as leaders, all Heads of Service, Managers, Team Leaders and key-holders are required to 'step up' to fulfil certain

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legislative duties in the absence of any nominated colleagues whilst in the workplace. This relates to:

- 4.9.1 Fire Safety – in the absence of a Fire Warden when working in an office building, for whatever reason; to assist the remaining Fire Wardens in sweeping the building and ensuring a safe evacuation and accounting of all evacuated people.
- 4.9.2 First Aid - in the absence of a First Aider when working in an office building, for whatever reason; to act as an ‘appointed person’.
- 4.10 All colleagues, including temporary and agency staff should have regard to their Safety Responsibility Statement within their individual job description, person specification and team risk assessment.
- 4.11 Additional welfare responsibilities:
 - 4.11.1 (Emergency) First Aiders who work in office buildings are responsible for providing first aid treatment to anyone who is injured, assisting anyone who is experiencing an episode of ill health in the workplace and:
 - Ensuring first aid boxes are stocked and accessible.
 - Contacting the emergency services as necessary.
 - Providing details of any first aid that has been administered by completing an incident form.
 - Attending training and refresher courses as required.
 - Support the Facilities Manager in first aid matters, as required.
 - 4.11.2 Appointed Persons are responsible for taking charge of first-aid arrangements in the absence of a First Aider, by providing emergency cover, within their role and competence, and calling the emergency services when required.

Fire Wardens have a duty to assist the Facilities Manager to implement the emergency evacuation plan for the office building in which he/she works. This includes ensuring people can escape safely and that everyone is accounted for. The specific duties of a Fire Warden are described in the Fire Safety Management Policy. Fire Wardens should also follow the procedure to "support Individuals at Risk from Fire" as required.

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5. CONSULTATION

- 5.1 Consultation has taken place with the HS Steering Group, the HS Committee in relation to the review and revision of this policy.
- 5.2 Ongoing HS consultation takes place on a quarterly basis at the HS Committee. The meeting is chaired by a Director, and its members consist of Trade Unions and Employee Representatives of HS, as well as heads of service and managers from across the Group and the HS Team and Compliance Team. The role of the HS Committee is also to promote communication and co-operation on all aspects of HS and monitor operational HS performance and help drive continuous improvement.
- 5.3 Arrangements have been made to ensure that The Forum is consulted about HS policy matters. The Group will also look to enhance how it engages with its customers and tenants about HS matters more actively, such as fire and building safety, including with the Tenants' Voice – Improving Services Group.
- 5.4 If any specific ongoing HS changes are proposed, such as the introduction of any additional fire safety precautions, that may affect a tenant, customer, contractor or partner, the relevant manager must ensure those affected are consulted prior to finalising arrangements and before implementing.

6. REVIEW

- 6.1 This policy will be reviewed annually, or before, where business needs identify a requirement for review, to ensure that it continues to accurately describe HS management within the Group.

7. EQUALITY IMPACT ASSESSMENT

- 7.1 An Equality Impact Assessment (EIA) has been carried out and is found to be of medium impact.
- 7.2 Arrangements are in place to consider equality factors within HS risk assessments, to enable reasonable adjustments and other control measures to be implemented to protect those that may be affected and to ensure HS is not applied unfairly to discriminate against others. A copy of the EIA is available on the intranet and upon request from the HS Team.

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7.3 Additionally, health and safety activity will reflect how the Group meets the diverse needs of customers, employees and visitors. This will be done by:

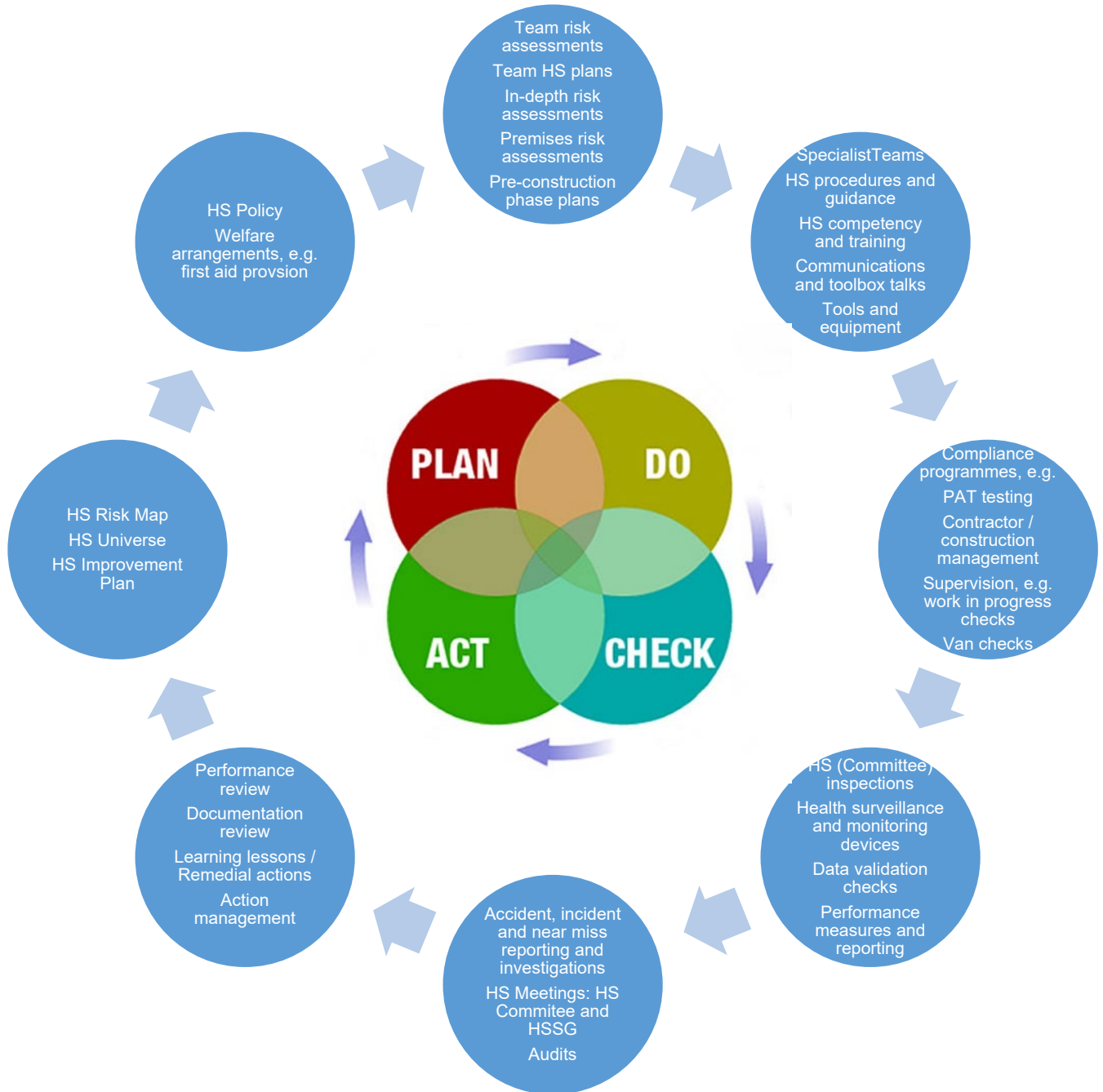
- Consulting on how to reflect equality in HS practice
- Ensure that HS Team are sensitive to the diverse needs of customers and employees when undertaking HS work
- Analysing data to understand the stakeholder groups involved in HS work
- Reflecting equality and diversity issues in work programmes
- Reporting on equality, diversity and inclusion issues where appropriate
- Supporting other colleagues within the Group in their scrutiny of equality, diversity and inclusion
- Ensuring that a flexible approach is adopted to HS practice
- Supporting the wellbeing of employees.

7.4 The Group welcomes any further contributions to informing our HS arrangements and EIA in relation to this policy and the nine protected characteristics.

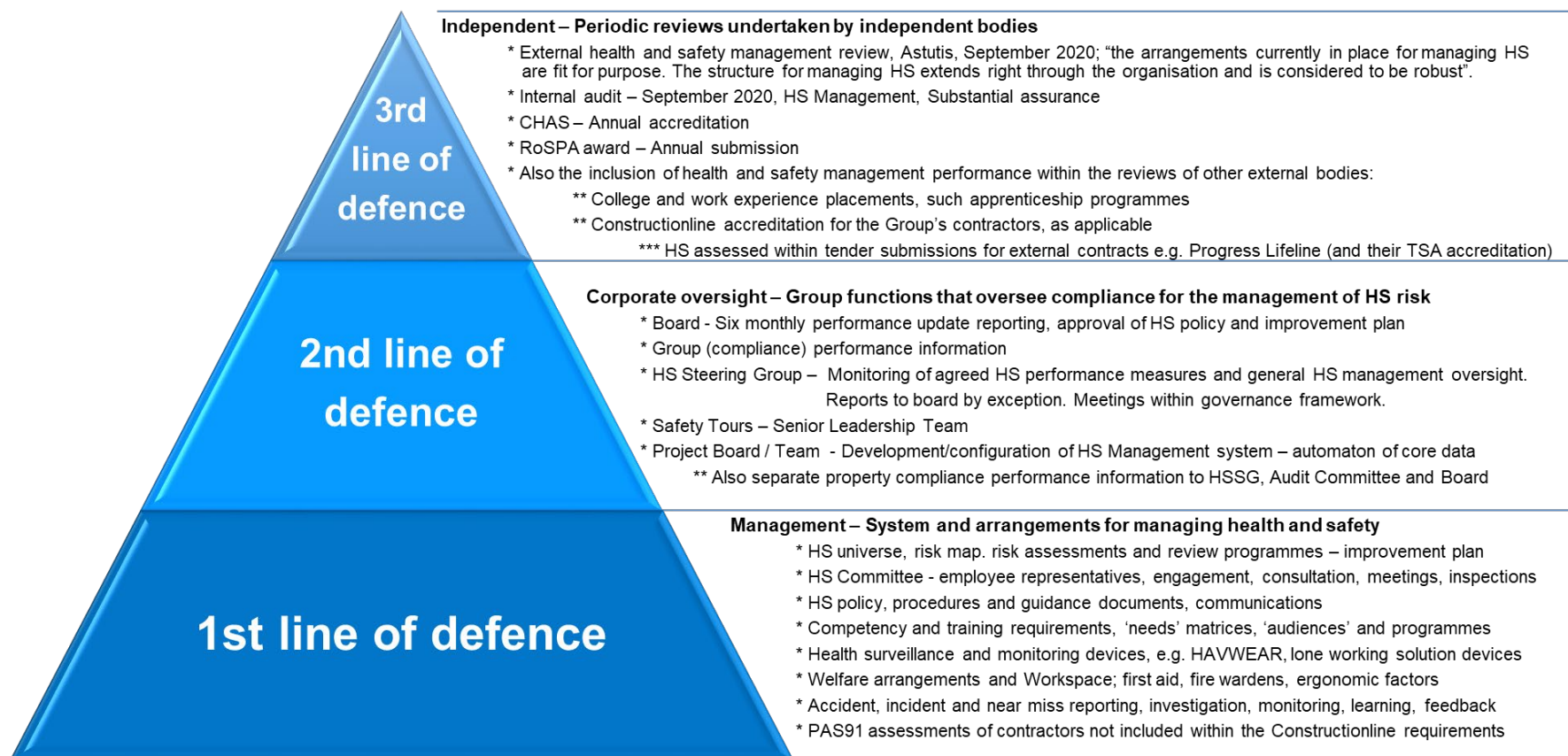
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Appendix 1

**Progress Housing Group's Plan, Do, Check, Act Model
for Corporate Health and Safety Management**



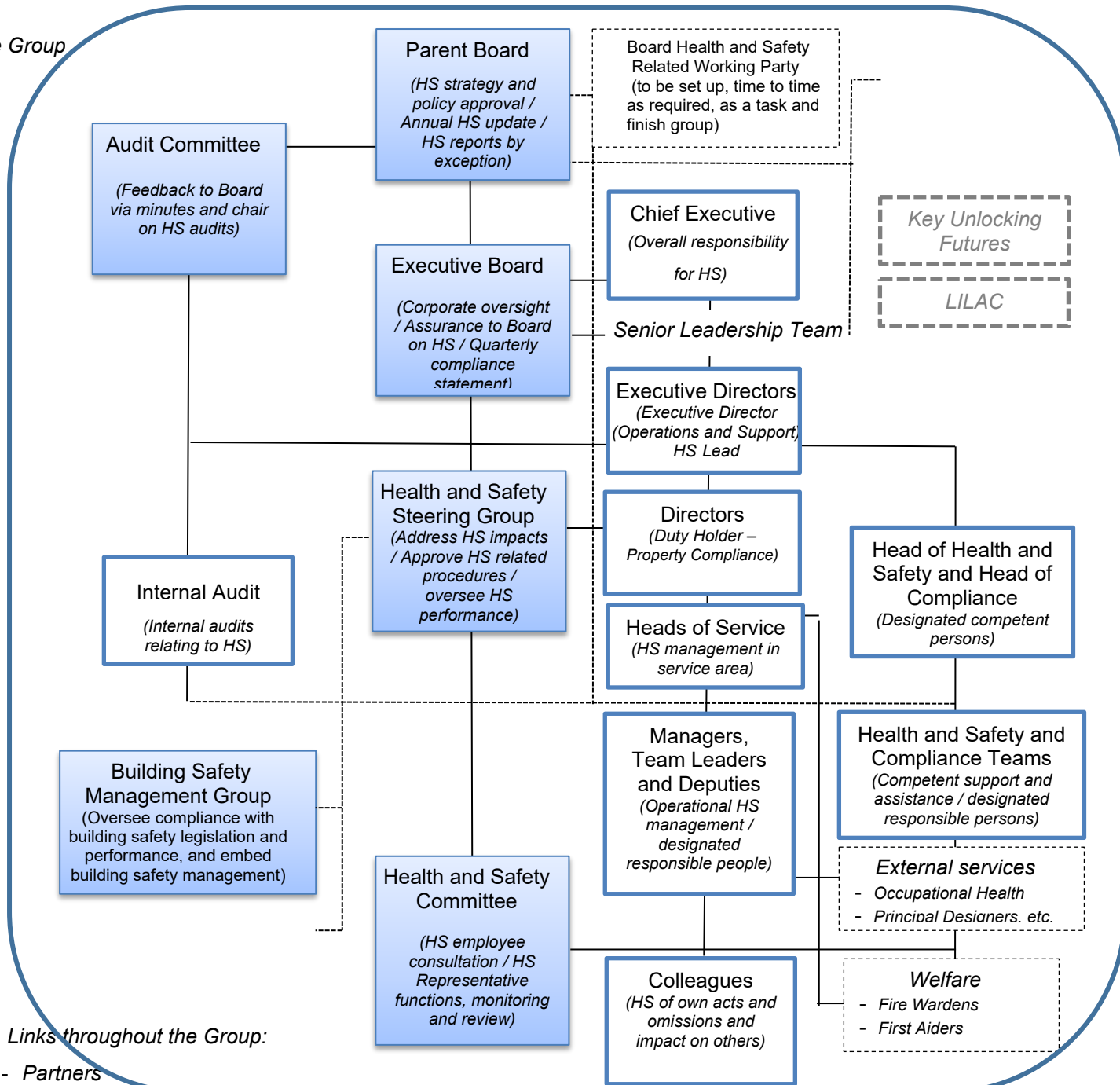
Progress Housing Group's 3 Lines of Defence Model for Corporate Health and Safety Management



Appendix 3

Organisational Structure for Health and Safety

- The Group



Links throughout the Group:

- Partners
- Contractors
- Customers and tenants
- Visitors
- Members of the Public

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Appendix 4

Key health and safety responsibilities

Post title / role	Responsibility
Parent Board	<ul style="list-style-type: none"> • Strategic direction for HS • HS within decision making processes • Sensible risk management approach • Provision of resources for Group to discharge HS responsibilities.
Chief Executive	<ul style="list-style-type: none"> • HS Policy remains valid and is signed and implemented • Ensure the Group complies with HS law.
Executive Board	<ul style="list-style-type: none"> • Implement the HS Policy • Maintain oversight and act accordingly.
HS Lead (Executive Director – Operations, Services and Support)	<ul style="list-style-type: none"> • Carry out the following functions: <ul style="list-style-type: none"> (a) monitor compliance with HS requirements (b) assess risks of failure to comply with HS requirements (c) notify the Executive and Parent Board of any material failures to comply with HS requirements (d) provide advice to the Executive and Parent Board as to how the Group should address risks and failures for the purpose of ensuring compliance with HS requirements. • Communicate in a timely manner with the RSH on all material issues that relate to non-compliance or potential non-compliance with HS requirements.
Senior Leadership	<ul style="list-style-type: none"> • Implement the HS Policy • Lead HS

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Team / Directors	<ul style="list-style-type: none"> Ensure HS compliance within their portfolio.
Subsidiary Companies	<ul style="list-style-type: none"> Director(s) to achieve all HS legislative requirements as applicable to its undertaking, as set out in its HS Policy.
Corporate HS Team and Property Compliance Team	<ul style="list-style-type: none"> Competent persons to assist the Group to undertake the measures needed, to comply with its statutory HS requirements.
Heads of Service	<ul style="list-style-type: none"> Health and safety compliance within their service area 'Step up' to fulfil legislative duties related to welfare (i.e. first aid and fire warden duties) in the absence of any nominated colleagues, whilst in the workplace.
Managers and Team Leaders	<ul style="list-style-type: none"> Health and safety compliance within their team 'Step up' to fulfil legislative duties related to welfare (i.e. first aid and fire warden duties) in the absence of any nominated colleagues, whilst in the workplace Implement the procedure 'Supporting Individuals at Risk from Fire', as required.
Colleagues / All	<ul style="list-style-type: none"> Health and safety of themselves and others affected by what they do Comply with HS requirements / control measures, within team risk assessments and attend mandatory health and safety training Co-operate and communicate with one another to maintain a positive HS culture.