

## HEALTH & SAFETY

### GENERAL POLICY & ARRANGEMENTS

Developed to meet, and exceed, the requirements of the ISO 45001:2018.

*This policy and our operational controls have been audited by technical experts to ensure compliance to legal requirements and that of the Occupation Health & Safety Standard.*

#### GENERAL POLICY – STATEMENT OF INTENT

This policy has been compiled in accordance with *section 2(3) of the Health & Safety at Work Act 1974* which dictates the need for every employer to prepare and update a written statement of general Health & Safety. We recognise our duties within the entirety of the above legislation and the accompanying legislation that has been introduced.

We ensure so far as is reasonably practicable the Health, Safety and Welfare of all the employees, clients, members of the public and all other parties who may be affected by our business activities.

Each employee is seen to have a role to play to uphold our Health & Safety policy, standards and legislation. In line with the *Management of Health & Safety at Work Regulations 1999*, we encourage feedback & contributions from staff as part of the consultation process to ensure that a healthy and safe working environment is maintained.

#### Cromwood Housing Group understands their duties, so far as reasonably practicable to:

- Identify **potential hazards** and conduct **assessments of risks** on a regular basis (*as determined by specific risk assessments and their review dates*).
- Ensure that **control measures** are implemented and appropriate to maintain the residual risk at an acceptable level.
- Develop **safe systems & methods of work** and ensuring that these are adopted.
- Provide and maintain **work equipment** as required, which is adequate for the task and safe to use.
- Provide and maintain a **Healthy and Safe environment** / safe place of work for the prevention of work-related injury and ill-health
- Ensure that **staff are competent** and within their **capabilities** (*through previous experience, qualifications and training*) to undertake their required duties.
- Ensure that **Information/guidance, instruction and training** is provided as necessary to employees and other parties (*i.e. visitors, contractors, clients*).
- Ensure that **protective & preventative measures** are in place are adequate and maintained.
- **Consult and communicate** with staff relating to matters of Health & Safety (*i.e. updates in working practices, procedures, legislation etc*).

The Directors are ultimately responsible for ensuring this policy is enforced, as well as having adequate resources and funds available to successfully fulfil the requirements as above.

#### ORGANISATION

The Directors & Management of Cromwood accept the responsibility for taking reasonable and practical measure to ensure the health, safety and welfare of employees and others who may be affected by our business activities not limited to ensuring suitable:

- Induction training programme & review
- Resources are deployed – including financial to meet the requirements of the policy
- Competencies maintained
- Communicating & consultation
- Documentation demonstrating employee's responsibilities
- Reporting & recording
- Regular review of Health & Safety controls
- Conduct management review meetings to analyse performance and implement improvements

Cromwood take health and safety seriously and as such have developed a formal Health & Safety management system which is certified to **ISO 45001:2018** to ensure that a defined mechanism of risk identification has been established which is used to capture and then assess the nature and extent of risk present throughout the activities of the organisation and its delivery of service to its clients.

## **ROLES, RESPONSIBILITY, AUTHORITY & ACCOUNTABILITY**

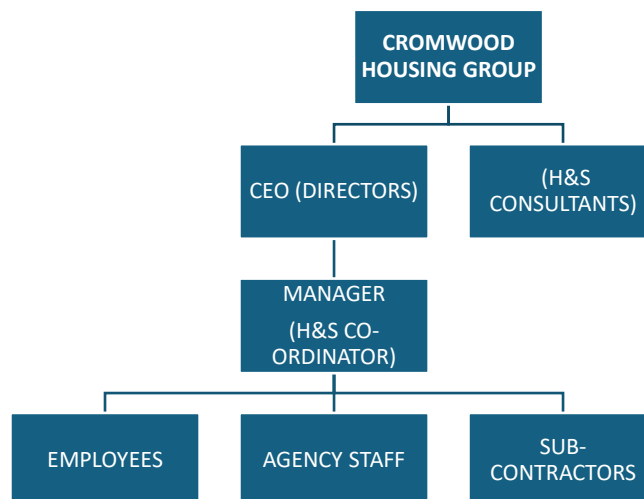
The IMS Manager has overall responsibility and authority for the management system and its associated documentation/requirements. This is currently assigned to Mendy Stern.

Directors have overall responsibility and accountability for health, safety, environmental and other requirements inclusive of ensuring that suitable resources are maintained.

Suppliers and sub-contractors (Directors and managers) have accountability for their own staff, however, we shall provide them with appropriate information and instructions when working within our premises.

## **STRUCTURE**

The organisational structure of the business is presented below demonstrating the established hierarchy for H&S management, control and responsibility:



The above chart shows ultimately responsible for Health & Safety as lying with the Directors of Cromwood Housing Group and demonstrates how each position interacts.

## **RESPONSIBILITIES**

Responsibilities are outlined as below, respective to the job role:

### **Directors Responsibilities**

The Director's Health and Safety responsibilities are to ensure that:

- The Policy is effectively implemented, monitored, developed and communicated effectively to all staff and that necessary alterations are made to the policy to reflect changes in legislation or Company development
- Suitable and sufficient funds, people and equipment are made available to meet the health and safety requirements of the Policy
- The appropriate insurance cover is provided and maintained
- Procedures are put in place to ensure that all equipment is in good condition, adequately maintained and guarded, is suitable for the purpose for which it is used and has any required certificates of inspection or examination
- All levels of management and employees understand their responsibilities for health and safety placed upon them by this policy
- An effective training programme is established to ensure that all levels of employees are trained and

- competent to carry out their duties
- The Board recognizes its role in providing health and safety leadership in the Company and to engage the active participation of workers in improving health and safety through continuous improvement
- Procedures are put in place to ensure that planning and control measures are provided to establish safe working methods for situations involving potential hazards
- Health and Safety objectives are set, and their achievement is measured and reported in the annual report

## **Manager (Health & Safety co-ordinator) Responsibilities**

The Health and Safety responsibilities at the Supervisors' level of management are to ensure that:

- They understand the Company's Health and Safety Policy and understand their responsibilities
- They actively lead the implementation of the Health and Safety Policy
- To provide supervision over employees throughout their work (ensuring that the health and safety policy, risk assessments and other documents are complied with)
- Written instructions are provided through risk assessment and safe systems of work, to establish working methods, to explain the sequence of operations, to outline the potential hazards and implementation of suitable risk controls
- They communicate and consult with staff on issues of health and safety and encourage staff to report hazards and raise health and safety concerns
- All accidents and incidents are correctly reported and recorded, and that action is taken to prevent recurrence of the accident or incident
- Persons under their control are adequately trained and competent to carry out their work and operate any plant or equipment in a safe manner
- Any hazardous substances are stored, transported, handled and used in a safe manner in accordance with manufacturers' instructions and established rules and procedures
- All plant and work equipment within the workplace is maintained in a safe condition, guarded in accordance with the relevant legislation and has the statutory certificates of inspection or examination
- Management is informed of any safety issues that cannot be resolved
- Personal protective equipment is readily available and maintained, and relevant staff are aware of its correct use, storage and procedures for replacement
- They set a good personal example by using the appropriate protective equipment whilst on site

## **Employees**

The Health and Safety responsibilities for employees includes;

- Taking reasonable care of your own health and safety and that of your co-workers
- Follow and adhere to communicated and participated Safe Systems of Work and Method Statements
- Report any accidents or dangerous occurrences as they occur
- Operate plant and equipment including vehicles in accordance with operating manuals and work instructions
- To take reasonable care not to put other people - fellow employees and members of the public - at risk by what you do or don't do during your work
- To co-operate with Cromwood ensuring you receive proper training and you understand and follow the company's health and safety policies
- Not to interfere with or misuse anything that's been provided for your health, safety or welfare
- To tell Cromwood if something happens that might affect your ability to work (e.g. becoming pregnant or suffering an injury)
- If you drive or operate machinery, to tell your Cromwood if you take medication that makes you drowsy and follow UK law in respect of drugs and alcohol and the use of hand held equipment

## **Sub-contractors**

The Health and Safety responsibilities for sub-contractors includes;

- Provide copies of company documentation relevant to their work such as:
  - Risk assessments
  - Method Statements
  - Insurance (employers & public liability as a minimum)
  - Trade certifications and/or licenses

- Training certificates/demonstration of competence
- Comply with our Health & Safety policy and procedures
- Follow instructions and full guidance set out within our contractor manual
- To take reasonable care not to put other people - fellow employees and members of the public - at risk by what you do or don't do during your work

## Visitors

The Health and Safety responsibilities for sub-contractors includes;

- Read and understand health & safety rules displayed within reception
- Sign in/out when entering & leaving the business

**OUR CERTIFICATION TO ISO 45001 IS DISPLAYED WITHIN THE OFFICES.**

## ARRANGEMENTS

The process of hazard identification is recorded within our combined Risk Assessment & Safe System of Work documents which identify risks as related to the following aspects of our works:

- Slips, Trips & Falls
- Manual Handling
- COSHH & Hazardous Substances
- Noise & Vibrations
- Use of Tools & Electrical Equipment
- Lone Working
- Driving
- Fire Safety
- Violence at Work
- Vehicles & Driving
- Stress

These risk aspects are assessed in relation to the job functions of the business to produce a combined document which details our corresponding Safe System of Work for the removal of risk where possible and to ALARP (As Low as Reasonably Practical) principles by the assessment of the task, operative training and competence, selection and use of materials and working environment in which services are delivered.

The document further provides guidance for the self assessment of situations and the application of PPE as a Last Line of Defence mechanism clearly illustrating that Cromwood do not consider the use of PPE as a Safe System but as a residual element of personal protection to be used after the main issue of risk has been identified, assessed and minimised.

Our Safe of System of Work has been created with consideration to the working practices of our clients to ensure that best practice is acknowledged incorporated into our operations. As part of our legal requirements under the Health and Safety (**Consultation with Employees**) **Regulations 1996** and the **Management of Health & Safety at Work Regulations 1999** we have undertaken the process of consulting with our maintenance operatives in respect to their activities and the extent of hazard exposure, creation of suitable systems and the content of our SSofW and Method Statements.

Communication and awareness of controls is supported by this process and our ongoing measurement and evaluation of performance and competence because of our internal auditing and subsequent review with staff.

Cromwood operate formal procedures for the identification of hazards and assessment of risk whose output is recorded in our combined RAMS documents. In addition to this we have created supporting procedures for the recording, investigation and reporting of accidents, corrective and preventive actions and the evaluation of compliance with the controls established and relevant statutory controls.

This dynamic element ensures that we also effectively use the outputs of our performance including the investigation and reporting of accidents, incidents and dangerous occurrences to improve our systems and controls over occupational health & safety.

## **Monitoring & Evaluation of Compliance**

The measurement and review of the effectiveness of the H&S Management System is completed by **Moses Hirschler operational controller** and through regular scheduled reviews of overall performance which include an evaluation of compliancy of the controls established, references to legislative requirements and the operational practices of the business.

Competent Health & Safety advice is outsourced to external specialists.

The output of these reviews will include continual development of the system and actions to address specific requirements in the event of incidents arising regarding performance.

## **Accident Reporting & Investigation**

All staff are communicated their responsibility to report accidents and dangerous occurrences to ensure that the business identifies any issues with its H&S performance. Once reporting an accident is entered our Accident Book and depending on the nature of the incident suitable investigated to apply a process of root cause analysis.

The outcome of the investigation will identify both corrective and preventive actions to resolve the issue and prevent its re-occurrence and may result in training, revision of Safe Systems of Work or changes in plant and equipment.

Should any incident be recorded as being RIDDOR status a complete report will be made to the Health & Safety Executive within the set timescales as prescribed by the HSE.

## **First Aid**

The business employs qualified EFAW (Emergency First Aid at Work) staff to provide constant cover during operational hours. Suitable First Aid kits are provided in response to risk assessments for both the office environment and in each maintenance vehicle to ensure that access to first aid materials can be made by all staff.

All first aid incidents are recorded in the Accident Book.

## **Welfare Facilities**

Suitable welfare facilities are provided for all workers and maintained and reviewed by the Health & Safety co-ordinator, these include adequate:

- Lighting
- Heating
- Ventilation
- Drinking water
- Safe Places of Work
- Emergency Procedures

Appropriate facilities for sanitation are also provided and include:

- Washing facilities (hot and cold water)
- Soap or cleaning products
- Drying facilities (towels etc)

## **Training, Awareness & Competence**

As stated Cromwood consult with staff regarding H&S controls and requirements to ensure that staff are involved and engaged in the process of hazard identification, risk assessment and removal of risk to create suitable Safe Systems of Work.

In addition to this process vocational training is provided in the use and operation of equipment, adherence to Safe Systems of Work and Method Statement controls to ensure that the following key factors are present throughout our workforce:

- Training
- Awareness
- Experience
- Competence

We ensure staff are aware of controls and are trained to complete the tasks expected of them and refresher training will be conducted as necessary. Competency and experience are assessed through their participation in training and awareness programmes and recorded within our Training Matrix to demonstrate a record of evidence.

## **Communication**

Communication of our H&S Policy is made to all staff through its presence on the company intranet system, notice boards and within each vehicle document pack. In addition, communication of our Health & Safety policy, along with supporting procedures maybe made available to third parties, clients and other stake holders as required.

Communication of RAMS is recorded by the sign off and acceptance of the documentation by all staff.

## **Fire Risk, Planning & Precaution**

Cromwood have completed suitable Fire Risk Assessments of their office environment and ensure that the mandatory controls required for Fire Detection Systems are met through the maintenance of their Fire Alarm, Extinguisher Inspection & Drilling record.

Fire Marshalls are employed by the business to ensure that the office premises are safely evacuated in the event of a fire that the emergency services are contacted, and staff details provided.

## **Waste Management**

Waste arrangements are in place to ensure that no waste can build up at dedicated storage areas prior to disposal or recycling. The Health & Safety co-coordinator will make suitable arrangements where there is to be an unusually high or excessive amount of waste produced during certain periods.

## **Occupational Health & Safety**

Cromwood have developed combined risk assessment, safe system of work and method statement documents for the roles within the business. These are split in to Maintenance Staff, Field Based Staff and Office Based Staff and consider the range of risk present within each role and the need to remove and reduce risk from working practices.

Each aspect of risk is addressed and assessed with demonstration of our Safe System of Work and specific Method Statements including pre-and post-control risk ratings. Included are:

- Slips, Trips & Falls
- Manual Handling
- Working at Height
- Use of Tools & Electrical items
- Lone Working
- Violence at Work
- Vibration & Noise
- Stress
- Driving & Vehicle Checks
- Smoking
- DSE requirements
- COSHH (Hazardous Substances)

In addition to the above range of aspects specific risk assessments will be undertaken for Pregnant Workers and those returning to work following Pregnancy. Other aspects which may require specific assessment are DDA

requirements and are assessed on an individual basis to make full consideration of the nature and circumstances of the member of staff.

## **Provision of PPE (Personal Protective Equipment)**

Cromwood do not acknowledge or accept that the use of PPE is considered a Safe System of Work and accept that PPE is considered the last line of defence once all other actions have been taken or established to remove and minimise risk. As such the issue and use of PPE to staff is shown within our RAMS documentation and is intended to augment the existing controls for the minimisation of risk. We do not charge for the issue of PPE, nor do we charge for PPE that requires replacing.

The health & safety coordinator will ensure that all employees are shown how to use, store, and check PPE as well as monitoring its use.

We do not operate a culture of minimal standards but one of best practice where possible.

## **Drugs, Alcohol and substance use**

Cromwood do not allow employees to work on their behalf when under the influence of drugs or alcohol. Employees found to be under the influence will be prevented from working immediately and may face disciplinary actions. Where medicine is prescribed that may cause drowsiness, the employee should inform management and an alternative role will be found if the employee usually operates machinery.

## **Electricity & Electrical Items**

Cromwood ensure that appropriate testing and inspection of electrical equipment is made prior to use to prevent accident or injury. Portable electrical items used within the office environment is tested annually and the result maintained on register which is updated when new equipment is added to the inventory (in addition to consideration of PUWER Regs) and tested prior to use.

Mobile equipment including extension leads, lighting and charging units for hand held tools are subjected to 3 monthly tests due to the added risk of damage in addition to a mandated visual inspection prior to individual use.

The offices are maintained in accordance with the regulations on Periodic Testing of the electrical system.

## **Stress**

As part of our sustainable management approach and policy commitments Cromwood view stress within the workplace seriously and aim to reduce this issue through the involvement and consultation with staff regarding job roles, occupational H&S and performance review. We offer a no combative appraisal process which is aimed at creating a dialogue with staff to facilitate an understanding and supportive management culture.

## **Working Time and Rest Periods:**

No employees are permitted or asked to work more than the working time regulations (currently 48 hours per week). The usual hours of work are between 9a.m. and 5.30p.m. Monday to Friday, unless the contract (statement of main terms) states otherwise.

## **Employee Support**

Cromwood are committed to ensure each employee has the required and appropriate tools, resources, training and information to successfully fulfil their job role. Where bullying or harassment is occurring, employees should report this immediately to the Director who will take appropriate action in accordance to solve and monitor the issues. We understand that stress may develop when these sorts of incidents occur, and we will support you by listening to any issues, taking appropriate actions to ensure resolution inclusive of contacting external agencies to providing counselling. We will support and listen to each employee and welcome any feedback or suggestions for improvements throughout the organisation.



## **Risk Management**

Risk assessments are conducted on a regular basis and reviewed upon accident, incident, near miss, dangerous occurrence, change in legislation, complaint/feedback or change in location or type of services provided. All risk assessments are carried out in conjunction with staff and are communicated/signed off by all once completed.

Risk assessments cover all activities undertaken and include office activities, field-based activities and specific assessments for noise, vibration, manual handling and COSHH (this may vary from time to time).

## **Records & Information**

All information, including Health & Safety documentation, accident records and health questionnaires will be recorded and stored securely in accordance with the Data Protection regulations. Any revisions and updates of this policy will be communicated to employees and made available for reference for our intranet.

**IMPORTANT NOTE: This policy is not a sole stand-alone document and is to be used in conjunction with the separate health & safety procedures, guidance manuals and risk assessments. This document is simply an overview and specific health & safety document is available as relevant to the specific task/role you undertake on behalf of the organisation.**

Signature:

Name: M Hirschler (Director)