

Health and Safety Policy

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Purpose and Scope of the Policy

- 1.1 The Council recognises and accepts its responsibility to provide and maintain the safest and healthiest work conditions which meet best practice and achieve legal compliance further to the Health and Safety at Work etc. Act 1974, s.2 (general duty of employers to employees), s.3 (general duty to non-employees), and the Management of Health and Safety at Work Regulations 1999, reg. 3 (risk assessment duty).
- 1.2 The Council also recognises that every accident/dangerous occurrence, however slight, is a matter for concern and that the need for constant alertness by all Directors, managers and employees is equally important in identifying potential hazards and removing or minimising their effect.
- 1.3 To this end it has been decided that the Health and Safety Policy for the Council shall be:
 - To institute and maintain safe working systems throughout the Council, including the introduction of permit to work systems (i.e. for hazardous situations or workplaces) where required.
 - To take all reasonable measures to establish the causes of accidents and impairments to health occurring throughout the Council and to institute all reasonably practicable remedial measures to prevent recurrence.
 - To provide all reasonable facilities to mitigate the effects of accidents and impairments to health and safety when they do occur.
 - To ensure that no process, plant, or machinery, is introduced in the Council unless it has conformed with any relevant statutory testing or examination requirement and it has been established that, so far as is reasonably practicable, the safety or health of employees will not be impaired.
 - To disseminate information on safe working relating to specific areas of work and on general safety and health matters relating to all employees.
 - To provide proper and adequate training facilities in order to ensure that all employees are fully instructed in the safe working methods applicable to their jobs.
 - To encourage and demonstrate the closest possible liaison between management and employees in all matters affecting safety and health, including the formation of Safety Committees and appointment of Safety Representatives as appropriate.
 - To ensure that all requirements of legislation relating to Council activities are fully complied with in regard to safety and health, it being recognised that these in the main constitute only a minimum standard of achievement.
 - To aim for continual improvement of health and safety performance through employee involvement and by the adoption of safety and health measures
- 1.4 To advise and keep employees informed of their duties and responsibilities further to s.7 and s.8 of the Health and Safety at Work etc. Act 1974

including:

- the requirement to adopt and follow safe working systems and practices
 - the requirement to make use of facilities and equipment provided for their protection
 - the requirement to abstain from any act which could endanger the safety or health of themselves or any other person
 - the requirement to refrain from intentionally or recklessly interfering with or misusing anything provided in the interests of health, safety or welfare
 - the requirement to report any known defect which could endanger the safety or health of themselves or other persons
 - the requirement to co-operate with the Council or any other person as far as is necessary to ensure that statutory duties or requirements are performed or complied with standards.
- 1.5 These requirements also apply to the staff of the Local Authority Trading Company. The Council will ensure appropriate health and safety governance arrangements are in place with the Trading Company through service level agreements or management agreements.
- 1.6 The standard that this policy aims to achieve is to ensure compliance with current health and safety legislation. Through the application of this Policy the Council aims to avoid Improvement Notices and Prohibition Notices issued by the Health and Safety Executive under ss.21-22 of the Health and Safety at Work etc. Act 1974.
- 1.7 The Council will ensure that sufficient resources are available to provide any health and safety equipment, personal protective equipment and training where appropriate.
- 1.8 Information and training for employees will be provided in order (as far as is reasonably practicable) to achieve and maintain a high standard of safety proficiency, in accordance with s.2(2)(c) of the Health and Safety at Work etc. Act 1974 and reg. 13 of the Management of Health and Safety at Work Regulations 1999.

Objectives

- 2.1 The Council's health and safety objectives within the Housing Service are:
- To secure the health, safety and welfare of all those who may be affected by our undertaking.
 - To demonstrate a commitment to health and safety through consultation and involvement.
 - To set health and safety performance targets to enable performance to be measured
 - To improve awareness of health and safety management amongst Housing Service staff.
 - To improve use of the intranet for health and safety related functions.

- To develop, maintain and implement procedures that are considered to be best practice.
- To consult and involve residents
- To ensure staff are provided with information, instruction and training
- To ensure all staff should have an agreed training programme which is reviewed annually.
- To ensure risk assessments are to be completed by a competent person in accordance with reg. 7 of the Management of Health and Safety at Work Regulations 1999 (Health and safety assistance)
- To ensure risk assessments are to be reviewed at least every three years, or prior to any significant change or following an accident.
- The Council will ensure risk assessments are suitable and sufficient in accordance with reg. 3 of the Management of Health and Safety at Work Regulations 1999, and are reviewed when there is reason to suspect they are no longer valid or there has been a significant change in the matters to which they relate
- To ensure that lessons learned from accidents, incidents, and near misses are shared across the Housing Service and wider Council to prevent recurrence
- To ensure any uncontrolled risks are mitigated effectively.
- To carryout continual hazard and risk identification to mitigate any potential for harm.
- Accidents/Incidents
- To ensure all accidents and incidents are reported in accordance with statutory requirement and departmental protocols.
- To ensure that accidents, incidents, dangerous occurrences and near misses are kept at the lowest possible level.
- To ensure that all identified risks are appropriately controlled.
- Monitoring and inspection
- To implement a routine procedure auditing programme to measure the effectiveness of management procedures.
- An annual review of the health and safety management system is to be undertaken by a competent person.
- To undertake performance reviews and maintain records of data collected in order to demonstrate continuous improvement in health and safety performance.
- All health and safety documentation is reviewed in line with statutory and department requirements and best practice.
- Maintain as appropriate emergency preparedness procedures.
- These will be subject to periodic review and re-assessment in the light of any internal or external changes in the way the Council operates.

Definitions

- Accident – an unplanned, unexpected event that results in injury or ill health to an employee, resident, contractor or member of the public, or some other form of damage or loss (e.g. to property) in relation to the Council's activities.

- Incident or Near Miss – an unplanned, unexpected event which did not result in injury, ill health, damage or loss, but had the potential to do so.
- RIDDOR – Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. These regulations require employers and those in control of premises to report specific workplace incidents to the Health and Safety Executive. Deaths and specified injuries must be reported without delay (within 10 days for full report). Over-seven-day injuries (where an employee is unable to carry out their normal work for more than seven consecutive days, excluding the day of the accident) must be reported within 15 days of the accident. Dangerous occurrences and work-related diseases must be reported without delay
- HSE – the Health and Safety Executive is the body responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare.

Responsibilities

- 3.1 The health, safety and welfare of all those who may be affected by the Council's activities is its highest priority and therefore, the Council commit to ensuring that appropriate resources are set aside for the delivery of safe systems of work, a safe environment for residents, the prevention of accidents, incidents and ill health, the effective management of our contractors and to meet health and safety targets.
- 3.2 The Chief Executive is responsible for overall health and safety compliance at the Council ensuring that all legal obligations are met, including ensuring that the Council's health and safety policy is prepared, maintained, and brought to the attention of all employees in accordance with s.2(3) of the Health and Safety at Work etc. Act 1974

Director of Housing

- 3.3 Reports to the Chief Executive, recommends policy, takes responsibility for management across the Housing Service.

Responsibilities include:

- Monitoring compliance and escalating where appropriate.
- Ensuring sufficient resources are available
- Provides adequate management systems and support to ensure standards are maintained.
- Communicating standards, requirements and providing updates on performance.
- Setting and monitoring performance standards
- Health and Safety to be an embedded agenda item with relevant Council officers
- Ensuring adequate arrangements are in place to meet all health and safety standards.

- Taking appropriate action to address health and safety issues which may arise.
- Facilities are in place to provide for staff consultation and communication.
- Housing Service policies are implemented.

HRA Assets Lead

3.4 Responsibilities include:

- Health and Safety Lead, designated under the Social Housing Regulation Act 2023 and the Health and Safety at Work Act 1974
- Monitor the Service's compliance with health and safety requirements
- Assess risks of failure to comply with health and safety requirements
- Notify Cabinet of material failures to comply with health and safety requirements
- Provide advice to Cabinet on how risks and failures notified should be addressed to ensure compliance.
- Ensure compliance with the Building Safety Act 2022 duties where the Council is the Accountable Person or Principal Accountable Person for Higher-Risk Buildings (buildings with at least seven storeys or 18 metres plus height containing at least two residential units);
- Oversee the mandatory occurrence reporting system required under s.62 and s.87 of the Building Safety Act 2022; 3. Maintain and update building safety cases for Higher-Risk Buildings

All Managers

3.5 Responsibilities include:

- Staff are provided with such information, instruction, supervision and training to enable them to safely carry out their duties.
- Risk assessments are carried out on work activities that may present a significant risk to staff, and suitable control measures are devised and implemented.
- Accidents, incidents and ill-health arising out of work are reported, recorded and investigated where necessary.
- Work areas are regularly inspected and monitored for unsafe conditions.
- Where managers have responsibilities for premises, risks relating to both employees and non-employees are adequately controlled. This includes compliance with s.4 of the Health and Safety at Work etc. Act 1974 (duties of persons in control of premises to persons other than their employees).

Employees

3.6 Responsibilities include

- Employees have a legal duty to take care of our own health and safety and that of others, fellow employees, contractors, tenants and visitors.
- Measures to control risks must be followed at all times.

- 3.7 Should staff become aware of any unsafe condition or action this should be reported immediately to the immediate line manager. Where there is serious and imminent danger, employees must take appropriate steps to protect themselves and others and, where necessary, stop work and leave the area of danger, in accordance with reg. 8 of the Management of Health and Safety at Work Regulations 1999 (Procedures for serious and imminent danger and for danger areas)

Competent Advisor

- 4.1 Specialist consultants act as "Competent Advisors", are responsible for:
- Advising the Housing Service on all health and safety matters concerning property management.
 - Producing management updates as required.
 - Undertaking risk assessments and inspections as directed by the Property Services Manager or Head of Housing.
 - Review as directed management compliance against legal, best practice and our requirements and reporting on a timely basis.
 - Undertaking accident investigations and emergency planning when required to do so.
 - Delivering training when required to do so
 - The Council will maintain records of the competence evidence of all specialist consultants (qualifications, professional memberships, insurance, training, CPD) and review their competence annually
- 4.2 Specialist consultants act as "Competent Advisors" appointed in accordance with reg. 7 of the Management of Health and Safety at Work Regulations 1999. A person is competent where they have sufficient training, experience, knowledge and other qualities to enable them properly to assist the Council in undertaking measures needed to comply with health and safety requirements (reg. 7(5) Management of Health and Safety at Work Regulations 1999).

Management Reporting

- 4.3 In line with Regulation 5 of the Management of Health and Safety at Work Regulations 1999 (MHSW) there is a general requirement to monitor and review preventive and protective measures with reference to health and safety.
- 4.4 The Housing Service recognises that its health and safety policy and procedures may need to be updated as legislative requirements are revised. To this end the Housing Service will conduct a regular review of health and safety policies and operational procedures to ensure compliance.
- 4.4 Policies and procedures must be in place to ensure the effective management of Health and Safety within the common parts of all properties, including compliance with the Regulatory Reform (Fire Safety) Order 2005 for fire safety in common parts.

- 4.5 The boundaries of control between residents and the Housing Service are defined within leases and the tenancy agreements.
- 4.6.1 The Housing Service has a responsibility to co-operate and co-ordinate with all residents on issues that affect the safety of the property, in accordance with the Management of Health and Safety at Work Regulations 1999, reg. 11 (Co-operation and co-ordination), and the Regulatory Reform (Fire Safety) Order 2005, art. 22 (General duties of employees at work)
- 4.7 Risk assessments should be linked to maintenance cycles and linked to events such as major incidents, health changes affecting residents and other relevant issues that leads to a change of circumstances when the risk assessments were first drafted. Special consideration will be made to vulnerable residents in all risk assessments, taking into account the Public Sector Equality Duty under s.149 of the Equality Act 2010, and the duty to make reasonable adjustments for disabled persons under s.20 of the Equality Act 2010.
- 4.8 Approved contractors are required to implement their own health and safety policies, procedures and control measures. Contractors must hold valid public liability insurance (minimum £10 million) and employers' liability insurance as required by the Employers' Liability (Compulsory Insurance) Act 1969.
- 4.9 Contractors must adhere to the Council's values and behaviours at all times including when working and engaging with residents. Any breach of these values will lead to the Council to consider disciplinary action against the affected contractors subject to due process.

Accidents, Incidents, Near Misses and Dangerous Occurrences

- 5.1 It is a requirement of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 that employers notify their enforcing authority of accidents at work that result in a fatality, specified injury (e.g. fractures other than to fingers, thumbs or toes, amputations, serious burns, loss of sight) or incapacity for normal work for more than seven consecutive days, excluding the day of the accident but including any days that would not normally be worked. Deaths and specified injuries must be reported without delay and a full report submitted within 10 days. Over-seven-day injuries must be reported within 15 days of the accident. This includes any act of physical violence done to a person at work. Dangerous Occurrences (e.g. collapse of scaffolding, explosion, electrical short circuit causing fire) and work-related diseases (following diagnosis) must also be reported without delay
- 5.2 The Council will ensure that:
- All accidents and dangerous occurrences (including near misses) that occur within the common areas of the property whether they are notifiable or not under RIDDOR, must be recorded by the contractor or staff as appropriate using the defined procedures.

- Should an accident, dangerous occurrence or near miss occur within the common parts of a property a thorough investigation must be undertaken in accordance with the documented accident investigation procedures.
- The scope of any investigation will be dependent on the severity of the incident. Where reasonably practicable, measures must be taken to prevent reoccurrence of any accident or dangerous occurrence and where necessary relevant risk assessments should be reviewed.
- The following incidents must be reported in line with the Council's procedures:
- Any specified injury, dangerous occurrence or incidence of disease relating to health and safety matters as defined by RIDDOR.
- Any accident/incident that involves an investigation by the HSE, local authority or the Environment Agency.
- Where the Council receives notification from the HSE of an investigation, inspection, or enforcement action, this must be immediately escalated to the Chief Executive, Director of Housing, HRA Assets Lead, and the Council's legal services team
- Equipment should be isolated in the event of an accident
- Any incident relating to health and safety or environmental matters which may cause specific concern in respect of public perception or where the incident may have direct implications such as legal proceedings.
- Records of all accidents should be held for a period of at least three years", add: "The Council should consider retaining accident records for longer periods where potential civil claims may arise (limitation period is generally three years from date of knowledge under the Limitation Act 1980, s.11, but can be longer for latent injuries). Records relating to exposure to hazardous substances should be retained for at least 40 years in accordance with the Control of Substances Hazardous to Health Regulations 2002, reg. 11
- An incident/accident which causes environmental damage or which poses an imminent threat of environmental damage may require reporting to the Environment Agency under the Environmental Damage (Prevention and Remediation) (England) Regulations 2015. Examples include pollution of water, land contamination, damage to protected species or habitats

Construction

- 6.1 The CDM Regulations apply to all construction work and covers physical safeguards which need to be provided to prevent danger.
- 6.2 Duties to achieve these standards are held by contractors who actually carry out the work, irrespective of whether they are employers or are self-employed. Duties are also held by those who do not carry out any construction work but control the way in which the work is done. The extent of the duty is in proportion to the degree of control which the individual or organisation has over the construction work.
- 6.3 General management duties apply to all construction projects by virtue of the Health and Safety at Work etc. Act 1974 under s.2 (duty to employees), s.3 (duty to non-employees), and s.4 (duty of persons in control of premises), and the Management of Health & Safety at Work Regulations 1999 (MHSWR)

which has specific reference to contractors under reg. 3 (risk assessment) and reg. 11 (co-operation and co-ordination)

- 6.4 In addition, the CDM Regulations sets out additional duties which apply to notifiable projects.
- 6.5 Projects are notifiable if they:
- Last 30 days or more and have more than 20 workers on site working at any one time
 - Involve more than 500 person days of construction work.
- 6.6 The Health and Safety Executive must be notified of any project that reaches the above threshold using Form F10 in writing or online.
- 6.7 Written Construction Phase Plan is required for every notifiable project, prepared by the Principal Contractor before the construction phase begins, in accordance with reg. 12 of CDM 2015
- 6.8 A Principal Designer and a Principal Contractor must be appointed in writing by the client when there is (or is likely to be) more than one contractor working on a project (reg. 5, CDM 2015), and in addition a Health & Safety file must be prepared by the Principal Designer and handed to the client at the end of the project (reg. 12, CDM 2015)
- 6.9 The Council will ensure that all contractors meet the following standards:
- Reasonable management arrangements in place throughout the project to ensure that the construction work can be carried out, so far as is reasonably practicable, safely and without risk to health.
 - All designers, contractors and others involved in the project are competent, adequately resourced and appointed early enough for the work they are required to undertake.
 - They allow sufficient time for each stage of the project.
 - They co-operate with others involved in the project as is appropriate to allow them to comply with their duties under the Regulations.
 - They co-ordinate their own work with others involved in the project in order to ensure the safety of those carrying out the construction work and others who may be affected by it.
 - Review contractors welfare arrangements throughout the construction phase of the project.
 - Any fixed workplaces that are to be constructed comply with any requirements of the Workplace (Health, Safety and Welfare) Regulations 1992.
 - All relevant information is passed to designers and contractors to enable them to carry out their work safely (e.g. asbestos registers).
 - The Council will verify contractor competence in accordance with the Council's Contractor Selection and Management procedures (section 7 below), ensuring that competence assessments are proportionate to the risks and complexity of the work.

6.10 The Council will:

- Identify the Client responsible for CDM where a project is led by a Project Board or Team. The 'client' under CDM 2015 means any person for whom a project is carried out (reg. 2). Where the Council commissions construction work, the Council is the client and must comply with client duties under regs. 4-6 of CDM 2015
- Notify the HSE before construction work begins using the online notification system
- Formally appoint a Principal Designer (PD) prior to the start of the construction phase
- Appoint a Principal Contractor prior to the start of the construction phase
- Ensure that the construction phase does not begin until the Principal Contractor has prepared a suitable construction phase plan and has made adequate welfare facilities available from the start of the construction phase (reg. 13, CDM 2015)
- Ensure adequate time for the construction project
- Provide pre-construction information to the PD including all project-specific health and safety information needed to identify hazards and risks associated with the design and construction work
- Ensure cooperation and coordination between parties
- Ensure management and welfare arrangements are in place
- Ensure workplaces are designed correctly
- Retain and provide access to the Health and Safety file.

6.11 Responsibilities of the Principal Designer

- Advise and assist the client with their duties including providing pre-construction information and ensuring designers comply with their duties (reg. 11, CDM 2015)
- Coordinate health and safety aspects of design and cooperate with others involved in the project
- Facilitate good communication within the project
- Liaise with the principal contractor regarding on-going design
- Identify collect and pass on pre-construction information
- Prepare and maintain health and safety file
- The Principal Designer should allow adequate time for any unseen circumstances that could delay construction

6.12 The Council accepts its responsibility under the above requirements to its employees, contractors and others who may be affected by its activities and in fulfilling the duties may require contractors to provide evidence of their competency and compliance with current statutory rules and regulations before entering into any contract.

Contractor Selection and Management

- 7.1 A contractor is anyone retained to carry out work who is not an employee to perform tasks such as maintenance, repairs, installation, construction, demolition and other activities.
- 7.2 All work activities are covered by health and safety law. Awareness of how the relevant legislation is applied is key to successful selection and management of contractors.
- 7.3 There are a number of specific regulations such as Management of Health and Safety at Work Regulations 1999 (SI 1999/3242); Construction (Design and Management) Regulations 2015 (SI 2015/51); Control of Substances Hazardous to Health Regulations 2002 (SI 2002/2677) which must be adhered to.
- 7.4 The employment of contractors or consultants will not absolve the Council of responsibility for ensuring that hazards have been identified, risks quantified and control measure meet the standard required. To this end reasonable steps must be taken to ensure the competence of contractors before entering into contracts. Similar steps must be taken to ensure on-going compliance.
- 7.5 The Council commits to the following actions:
- The Council will ensure that all contractors are thoroughly vetted to ensure they have adequate health and safety policies, procedures and practices in place prior to being used on our properties.
 - Competence assessment must be proportionate to the work and the risks involved. For low-risk, routine work, basic checks may be sufficient. For high-risk or complex work (e.g. asbestos removal, work at height, confined spaces, major construction), rigorous competence checks including trade accreditations, specialist certifications, safety records, and past performance are required
 - The Council will ensure contractors are provided with the necessary information required to undertake the work safely. Such information may include but is not limited to risk assessments, safe systems of work, statutory inspections, training records and monitoring procedures.
 - The Council shall maintain a copy of the contractor's written health and safety policy statement along with risk assessments, method statements and Public Liability and Employers Liability Insurance This will be subject to a periodic review.
 - Employers' Liability Insurance must be for at least £5 million in accordance with the Employers' Liability (Compulsory Insurance) Regulations 1998. Public Liability Insurance should be for at least £10 million for construction and high-risk works. This will be subject to an annual review, or more frequently for high-risk contracts.
 - The Council will notify residents affected by any works and ensure they are consulted prior to works being undertaken and kept informed as to the progress of the relevant works.

Contractor's responsibilities

- 7.6 All contractors must ensure compliance with the terms and conditions of their contract which makes specific reference to compliance with legislation and Approved Codes of Practice at all times.
- 7.7 It will be the responsibility of approved contractors to review risk assessments and method statements, comment on their suitability and make adjustments where required to ensure that the health and safety of all parties is protected throughout the period of the work. Details of this review must be provided to the Housing Service. Wherever possible the contractor must ensure that risk is eliminated.
- 7.8 The Council will ensure that no hazardous works are to be carried out without the completion of a valid permit to work form. The following works are considered to be hazardous:
- Hot works*
 - Work within a confined space
 - Certain work at height e.g. working on unprotected roof areas.
 - High risk electrical works e.g. live working.
 - Removal of asbestos, for details please refer to the Council's Asbestos Policy.
- 7.9 The Council will ensure that all permits to work are supported by a written risk assessment and method statement that must be submitted in advance. Any permit to work must be authorised by an appropriate and competent person. Suitable records must be maintained.
- 7.10 The Council will ensure that contractors do not start any hazardous work without the authority of the appropriate signed and dated permit to work. All permits to work should be time limited and are valid only for the period stated on the document itself. For high-risk activities including confined space entry, hot works, and work on live electrical systems, permits must be reviewed and renewed daily if work continues beyond one working day.
- 7.11 It shall be the responsibility of the contractor to ensure that before the contractor's employees leave the site:
- The work area is free from obvious hazards.
 - There are no residual fire safety hazards.
 - There should be safe storage of equipment and chemicals
 - All equipment that has been worked on has been re-commissioned and is operating safely (or is safely decommissioned as is appropriate).
 - The contractor will sign in before commencing work and out on the completion of the work each day on site.
 - When issued a permit to work must be signed off as completed
 - To provide any new documentation when a provided document has passed its agreed anniversary expiry date
 - There should be safe routes of travel for customers when contractors on site

- When issued, a permit to work must be signed off as completed and returned to the authorising officer with confirmation that the site has been left safe and all fire safety measures have been reinstated.

*Hot Works is defined as “operations requiring the use of open flames or the local application of heat or friction”. This includes welding, flame cutting, soldering, brazing, grinding and the use of other equipment incorporating a flame, e.g. tar boilers, etc. The definition of Hot Works applies to all references to hot works in this policy.

Resident Engagement

- 8.1 Co-operation is needed to effectively carry out the general duties under s.3 and s.4 of the Health and Safety at Work etc Act 1974 (duties to non-employees and persons in control of premises), as well as more specific duties under other Regulations.
- 8.2 The Management of Health and Safety at Work Regulations 1999 and the Regulatory Reform (Fire Safety) Order 2005, requires persons who share a workplace to co-operate and co-ordinate and exchange information to ensure that our legal obligations are met. These regulations concern all people who may be at risk, both on and off site. They also include situations where an employer may not be physically present at the workplace.
- 8.3 The Council commits to the following actions
 - The Council shall provide tenants with information packs containing all relevant property management details together with the tenant's responsibilities including information on fire safety, gas safety, electrical safety, and how to report repairs and hazards
 - The Council will ensure that residents will be informed of all changes in policy
 - The Council shall maintain an appropriate method whereby residents may report defects in the premises.
 - The Council shall develop and maintain relevant emergency procedures for the common parts of the property and make them readily available to all residents
 - The Council shall make available to all tenants copies of risk assessments relevant to the common parts of their buildings, in accessible formats. Personal data will be redacted in accordance with UK GDPR and the Data Protection Act 2018 The Council shall establish and maintain effective communication with residents
 - The Council shall provide information to tenants through mediums such as the *In-Touch* magazine
 - The Council will engage residents in accordance with the Regulator of Social Housing's Tenant Involvement and Empowerment Standard under the Social Housing (Regulation) Act 2023, ensuring residents' voices are heard on health and safety matters that affect them
 - For Higher-Risk Buildings (18m+ or 7+ storeys with 2+ residential units), the Council will prepare and maintain a Resident Engagement Strategy in accordance with s.87 of the Building Safety Act 2022, setting out how residents will be involved in decisions affecting building safety

Staff Engagement

- 9.1 The Council recognises the right under the Health and Safety at Work etc. Act 1974, The Safety Representatives and Safety Committees Regulations 1977 (SI 1977/500), and the Health & Safety (Consultation with Employees) Regulations 1996 (SI 1996/1513) for recognised trade unions to appoint Safety Representatives
- 9.2 The Council commits to the following actions:
- The Council shall encourage the involvement of staff in formulating procedures to effectively manage health and safety in all aspects of the business.
 - The Council shall allow reasonable time away from staff's normal tasks in order to perform inspections of the workplace, attend training, and safety committee meetings in accordance with regs. 4 and 4A of the Safety Representatives and Safety Committees Regulations 1977
 - The Council will provide worker representatives with access to health and safety information and appropriate facilities appertaining to the work task.
 - The Council will instigate, develop and implement measures to ensure the Health Safety and Welfare of employees at work.
 - The Council will monitor the progress of initiatives to address specific health and safety matters.
 - The Council will review how successfully the health and safety policy has been implemented.
- 9.3 All new employees, whether they are full-time, part-time, work experience, work placement or volunteers will be provided with sufficient health and safety information, instruction and training to ensure that they are aware of the hazards in the workplace and know what safe working procedures to follow to reduce the risk of injury or work related ill health, to themselves and others.
- 9.4 Managers will ensure that new employees receive a health and safety induction, which covers emergencies such as fire or injury on the first day of work and other health and safety information and training pertinent to their role within the first week of employment.
- 9.5 The HRA Assets Lead is responsible for designing the health and safety induction training material and for ensuring it remains up to date and reflects current policies and legislation.
- 9.6 Health and safety induction training will be recorded using a checklist, which is signed and dated by the new employee and the person undertaking the induction. Training records will be maintained by HR within the employees' file

Training

- 10.1 It is a requirement under s.2(2)(c) of the Health and Safety at Work etc. Act 1974 and reg. 13 of the Management of Health and Safety at Work

Regulations 1999 that adequate information, instruction, training and advice with regard to health and safety matters will be given to all employees

10.2 Information will be communicated through

- Internal and external training courses, team briefings intranet.
- Digital platforms.
- Risk Assessments
- Other means as necessary (for example, Fire Service, Environmental Health Officers, Health and Safety Executive, Environmental Agency, ROSPA, British Safety Council, IOSH and British Standards).

10.3 Records of information, instruction and training received by employees will be maintained on the individual's personnel record and retained for the duration of employment plus six years in accordance with the Limitation Act 1980.

First Aid

11.1 The Health and Safety (First-Aid) Regulations 1981 require organisations to provide adequate and appropriate first-aid equipment, facilities and people so employees and others can be given immediate help if they are injured or taken ill at work.

11.2 The Council commits to the following actions:

- The Council will ensure that suitable first aid materials are provided in community centres and Council offices
- The Council will ensure first aid materials are routinely checked by on site staff and formally inspected monthly and after each use. Out of date dressings must be discarded and materials replenished as required.
- The need for first aid training and equipment provision must be assessed subsequent to the risk assessment taking into account: the nature of the work and workplace hazards; the size of the organisation and distribution of employees; the organisation's accident history; the remoteness of the site from emergency medical services; employees working on shared or multi-occupied sites; shift working and out-of-hours work
- The minimum requirement is to appoint a person to take charge of first-aid arrangements. The roles of this appointed person include looking after the first-aid equipment and facilities and calling the emergency services when required. They can also provide emergency cover, within their role and competence, where a first-aider is absent due to unforeseen circumstances (annual leave does not count).
- The Council will require that any first aid treatment provided must be recorded on an incident report logged with Property Services
- Where employees work alone, in isolated locations, or engage in high-risk activities, additional first aid provision including trained first aiders or emergency first aid training for all staff should be considered

Mandatory Occurrence Reporting

- 12.1 This section of the Health and Safety Policy has been developed to outline the process for Mandatory Occurrence Reporting, in line with the Building Safety Act 2022 (BSA).
- 12.2 The BSA requires the Principle Accountable Person (PAP) to establish a mandatory Occurrence reporting system (MOR) to report building safety risks on higher-risk buildings (HRB), to the Regulator. A 'mandatory occurrence reporting system' is a means of giving information to the Accountable Person and the Building Safety Regulator (BSR).
- 12.3 The Building Safety Act 2022 Section 62(1) defines a 'building safety risk' as a risk to the safety of people in or about a building arising from any of the following occurring as regards the building:
- (a) the spread of fire
 - (b) structural failure
 - (c) any other prescribed matter.
- 12.4 The Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023 defines a 'Safety occurrence' as an incident or situation relating to the structural integrity of, or spread of fire in, a higher-risk building that meets the risk condition.
- 12.5 The 'risk condition' is met if a part of a building in use would be likely to present a risk of a significant number of deaths, or serious injury, to a significant number of people due to an incident or situation not being remedied.
- 12.6 The safety occurrence must have taken place in the part of the building for which the Accountable Person (AP) is responsible.
- 12.7 Some examples that could meet the criteria of what to report to BSR when the building is occupied by residents, include:
- the spread of fire or something that could lead to the spread of fire
 - total or partial collapse of the building
 - defective building work unexpected failure or the degradation of construction materials
 - the discovery of structural defects
 - failure of a critical fire safety measure, such as an automatic opening vent, smoke extraction or fire doors
- 12.8 Some examples that could meet the criteria of what to report to BSR during the construction of a new building by the Principal Designer (PD) and Principal Contractor (PC), include:
- defective building work, including defective competent person scheme work which is part of the wider building work

- fire safety issues likely to result in the spread of fire
- the use of non-compliant products or incompatible compliant products in the construction of the building
- inappropriate or incorrect installation of construction products
- product failure against specification and claimed performance
- faults in the design plans, caused by either design software or human error

- 12.9 A single reporting system is required for each Higher-Risk Building (HRB) operated by the Principal Accountable Person in accordance with s.90 of the Building Safety Act 2022.
- 12.10 Failure to report a building safety risk, without a reasonable excuse, is a contravention to subsection (1) of the BSA and deemed an offence which is liable on summary conviction to a fine.
- 12.11 The notice must be given to the Regulator as soon as is reasonably practicable under s.85(3) of the BSA. A full report must be provided to the Regulator within 10 days of it coming to the Accountable Person's attention, beginning with the day it came to the AP's attention, in accordance with reg. 27 of the Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023.
- 12.12 The Resident Involvement Strategy must be reviewed by the Principal Accountable Person (PAP), within a 30-day period after a MOR in relation to the building is submitted to the Regulator, under Section 87 of the BSA.
- 12.13 All Safety Occurrences will need to be included in the building safety case.
- 12.14 The AP will be responsible for ensuring the safety occurrence is recorded.
- 12.15 The AP will be responsible for reporting safety occurrences to the Regulator as soon as is reasonably practicable.
- 12.16 The AP must carry out a full report ensuring the report is recorded and issued to the BSR within 10 days of the occurrence coming to the attention of the AP.
- 12.17 The AP will be responsible for ensuring corrective actions are established, carried out and recorded.
- 12.18 The AP will be responsible for any further liaison with the Regulator on the MOR matter.
- 12.19 The HRA Assets Lead should be notified in writing, who will then escalate to the Director of Housing of the building that the Occurrence has been raised.
- 12.20 The HRA Assets Lead should inform the Director of Housing that the MOR notice has been submitted to the BSR, and should record the Mandatory Occurrence Reference Number provided by the BSR on the Council's Housing Management Service database.

- 12.21 The HRA Assets Lead and the Director of Housing should investigate the MOR notice and ensure the MOR report is submitted within 10 days.
- 12.22 The investigation should include the production and submission of a detailed report identifying the cause, effect and what has been done to remediate/eliminate any risk including interim measures. This report together with the MOR notice and report is included into the Golden Thread of information for the building. In addition, the Council must take interim measures to ensure the safety of residents and staff while recommendations to address systemic issues are being considered.
- 12.23 All MOR Reports submitted must be provided to the BSR as part of any Building Assessment Certificate (BAC) application and must include a list of incidents reported to the BSR since the last Building Assessment Certificate assessment. This must include a brief description of the incident/s, the incident date and any reference numbers provided by the BSR for the reports.
- 12.24 The Council will follow the same process if a resident makes a complaint that meets the criteria of what to report to the BSR
- 12.25 All outcomes of an MOR will be communicated to the wider Property Services and HRA team and other relevant stakeholders to ensure learning is circulated to the wider organisation.

Lone Working

- 13.1 The HSE have issued guidance documents which provide standards of workplace safety to be achieved such as the Management of Health and Safety at Work Regulations (1999) which requires a suitable and sufficient assessment of risks arising from work activities, including reasonably foreseeable violence, to be undertaken.
- 13.2 This policy covers risks to staff health resulting from acts of violence or aggression whilst undertaking duties for the Council, or from risks incurred through lone working. It encompasses contractors or agency staff working on behalf of the Council as well as Council members of staff.
- 13.3 The Health and Safety Executive defines lone workers as “those individuals who work by themselves without close or direct supervision”. This applies to workers in a number of situations including those who work alone at a site, premises or in restricted areas, workers who are mobile and often work away from their usual workplace, home-workers and those working outside normal hours. It can also apply to specific circumstances such as being first in to, or last to leave an office.
- 13.4 The Council is committed to minimising risks through pro-active risk assessment, the provision of lone working guidelines and codes of safe working practice.

- 13.5 The Council will not tolerate any aggressive act, physical contact or verbal abuse at the workplace.
- 13.6 The Council will ensure that lone workers have effective means of communication (e.g., mobile phones, lone worker alarms, check-in systems) and that procedures are in place to respond if a lone worker fails to check in or raises an alarm.
- 13.7 Risk assessments for lone working will consider the environment (isolated locations, high-crime areas); the nature of the task (working at height, confined spaces, electrical work); the capability of the individual (experience, training, health conditions); and arrangements for monitoring and emergency response.

Slips, Trips and Falls

- 14.1 The Health and Safety Executive (HSE) have issued guidance documents which provide standards of workplace safety to be achieved such as the Management of Health and Safety at Work Regulations 1999 and the Workplace (Health, Safety and Welfare) Regulations 1992.
- 14.2 The Management of Health and Safety at Work Regulations 1999 requirements include duties on employers to assess risks (including slip and trip risks) and where necessary take action to safeguard health and safety.
- 14.3 The Council will ensure that appropriate floor finishes are provided and maintained.
- 14.4 The Council will ensure that an appropriate cleaning regime is maintained, including dealing effectively with spillages.
- 14.5 The Council will ensure good housekeeping is maintained and the walkways are not obstructed.

Void Properties

- 15.1 The Occupiers' Liability Acts 1957 and 1984 impose duties on landlords to ensure premises are reasonably safe for lawful visitors (1957 Act) and trespassers (1984 Act). Under the Occupiers' Liability Act 1957, s.2, an occupier owes a common duty of care to all lawful visitors to ensure that they will be reasonably safe in using the premises. Under the Occupiers' Liability Act 1984, s.1, a duty of care is owed to trespassers in respect of injury suffered on the premises if the occupier is aware of the danger or has reasonable grounds to believe it exists, knows or has reasonable grounds to believe that others may come into the vicinity of the danger, and the risk is one against which the occupier may reasonably be expected to offer some protection.
- 15.2 It is required that where a lease or tenancy agreement has expired or has been revoked the Council have the same legal responsibilities in respect of

unoccupied areas of any property as for the common parts of occupied premises. Unoccupied properties or units are likely to attract the attention of vandals, intruders, squatters and arsonists. A risk assessment will be undertaken to manage and reduce risks in unoccupied.

- 15.3 In all cases the asbestos register will be checked and if there is no record of an asbestos survey for the property one will be carried out prior to any refurbishment or re-letting, in accordance with the Control of Asbestos Regulations 2012, reg. 4 (duty to manage asbestos in non-domestic premises)
- 15.4 The following actions will be considered based on the type of property, its location and whether it is likely to be a short or long term void.
- Gas supply to be turned off at the main.
 - Water supply to be turned off at the main and the water installation fully drained down.
 - Electricity supply to be turned off at the main. If it is necessary for essential circuits to be left on for intruder/fire alarm systems etc. or lighting for periodic security visits etc., it must be ensured that the wiring to those parts is in a safe and satisfactory condition. Non-essential circuits isolated, either by turning off at the main switch or by removal of fuses, (unless required by contractor to carry out essential works).
 - All letterboxes sealed to prevent insertion of flammable material.
 - All combustible contents, especially waste, should be removed from inside and adjacent to the premises.
 - The premises must be made secure. At the very least we would expect:
 - good quality locks and bolts on all doors;
 - Where a property is likely to be a long term void or where a risk assessment identified an elevated risk, glazed areas, if accessible, i.e. ground and basement windows and upper floor windows if accessible from flat roofs etc. and glass in doors, should be boarded over using suitable material;
 - where intruder alarms exist, these will be used if possible;
 - where provided perimeter site security, i.e. fencing and gates, will be maintained in good condition.
 - Gardens to be kept well-trimmed/maintained (gives appearance property is occupied).
 - The Council will ensure that void premises will be visited as defined by a risk assessment and a thorough inspection carried out internally (although it is appreciated that access to leased premises may not be possible) and externally. The frequency of visits may need to be increased, depending on the nature of the premises, its location and loss history. A log detailing times and dates of visits will be maintained.
 - A record of all void property inspections must be maintained, including date, time, inspector name, condition found, and any actions taken. These records form part of the Council's evidence of compliance with its Occupiers' Liability Act duties

- As part of the termination of contract of letting procedure gather relevant health and safety information from tenants prior to the vacation of any property/part of property.

Work at Height

- 16.1 The Council must adhere to the Work at Height Regulations 2005.
- 16.2 A place is 'at height' if a person could be injured falling from it, even if it is at or below ground level.
- 16.3 The Regulations apply to all work at height where there is a risk of a fall liable to cause personal injury. They place duties on employers, the self-employed, and any person that controls the work of others (for example facilities managers or building owners who may contract others to work at height).
- 16.4 The Regulations include schedules giving requirements for existing places of work and means of access for work at height, collective fall prevention (platforms), collective fall arrest (mitigation.), personal fall protection and ladders.
- 16.5 Work at height should be avoided where possible. Where work at height cannot be avoided, the Council must apply the hierarchy of measures in reg. 6 of the Work at Height Regulations 2005: (a) prevent falls through physical precautions (guardrails, working platforms); (b) where prevention is not possible, minimise distance and consequences of falls (fall arrest equipment, nets, airbags); (c) provide instruction and training.
- 16.6 The Council will ensure:
- That all work at height must be planned and organised, this may involve using a specialist contractor or the issue of a permit to work.
 - The Council will require persons involved in work at height are trained and competent to the extent required by the type and complexity of work, in accordance with reg. 5 of the Work at Height Regulations 2005 (competence)
 - The Council will require that where work at height is undertaken suitable and sufficient risk assessments have been undertaken and recommended control measures such as fall arrest systems which minimise the distance a person could fall and the consequences of a fall are used, ensuring collective protection measures (guardrails, working platforms) take priority over personal protection measures (harnesses) in accordance with Schedule 3 of the Work at Height Regulations 2005
 - The Council will advise the contractor of any site specific risks e.g. where edge protection is not fitted the contractor will be advised and it will be the responsibility of the contractor to ensure that appropriate safe access arrangements are in place and enforced prior to any roof work being undertaken.
 - The Council will ensure that all fixed ladders are of sound construction and securely fixed. Where the ladder is higher than two and a half metres must be provided with suitable safety hoops or fixed fall arrest systems as

recommended by the Workplace (Health, Safety and Welfare) Regulations and in accordance with Schedule 5, para. 7 of the Work at Height Regulations 2005

- The Council will require that all ladders are securely stored in a way that will prevent use by unauthorised persons such as tenants and contractors.
- The Council will ensure that all ladders are inspected prior to every use by the user and must be subject to formal inspection by a competent person on a 6 monthly basis and a ladder log maintained. The ladders must be marked to indicate the date of the last inspection, in accordance with reg. 12 of the Work at Height Regulations 2005 (inspection of work equipment)
- The Council will ensure that all ladders are inspected prior to every use and must be subject to formal inspection on a 6 monthly basis and a ladder log maintained. The ladders marked to indicate the date of the last inspection.
- The Council will maintain all ladders used on site must be kept in good condition. Defective ladders must be immediately and correctly disposed of.
- Roof access doors and hatches must be kept locked with appropriate warning signage applied to discourage unauthorised access and where applicable, physical barriers or edge protection must be installed in accordance with reg. 6 and Schedule 2 of the Work at Height Regulations 2005
- The Council will ensure that the risks from fragile surfaces (e.g., asbestos cement roofs, glass roof lights, liner panels) are properly controlled through platforms, coverings, fall arrest equipment, or other suitable means, and appropriate warning signage applied to fragile roof areas in accordance with reg. 9 and Schedule 4 of the Work at Height Regulations 2005

Flammable Liquids & Explosive Atmospheres

17.1 The Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) (SI 2002/2776) require employers to assess the risks from dangerous substances and implement control measures. Managers will ensure that:

- Flammable liquids must only be stored in an approved metal or plastic container. This must be kept secure in stores or vehicles when not in use.
- No smoking is permitted within 20m of fuel or flammable liquid.
- The storage of flammable liquids must be secure, adequately ventilated and clearly signed. All storage areas are subject to an annual Risk Assessment review.
- Controls are in place to reduce the effects of any incidents involving dangerous substances in accordance with reg. 6 of DSEAR 2002 (risk assessment) and reg. 7 (elimination or reduction of risks from dangerous substances)
- Plans are prepared and procedures to deal with accidents, incidents and emergencies involving dangerous substances.
- Employees are properly informed about and trained to control or deal with the risks from the dangerous substances.
- Employees wear all necessary Personal Protective Equipment (PPE) as defined in the Risk Assessment before commencing any works.

Pesticides

18.1 Managers and Supervisors will ensure that

- Any employee supervising, mixing, applying pesticides or disposing of pesticide containers must hold the relevant professional competence certificate recognised under the Plant Protection Products (Sustainable Use) Regulations 2012 (formerly NPTC competence certificate)
- The storage of pesticides must be secure, adequately ventilated and clearly signed. All storage areas are subject to an annual Risk Assessment review.
- The storage of pesticides does not exceed the threshold limit of 200kg, after which a Storekeeper's Certificate is a requirement.
- All pesticides must be used by authorised employees as directed by the manufacturer, supplier and container label
- Employees to wear all necessary Personal Protective Equipment (PPE) as defined in the Risk Assessment before commencing any works.

Biological Hazards

19.1 Biological Hazards, also known as biohazards, refer to biological substances that pose a threat to the health of living organisms, primarily that of humans. This can include human and medical waste or samples of a microorganism, virus or toxin that can affect human health.

19.2 There are a number of naturally occurring biohazards, which can cause serious problems to health should they be inhaled, ingested or inhaled. Examples include: plant saps (hogweed, staghorn Sumac), fungal spores, blue green algae, animal faeces, leptospirosis (weils disease), legionella.

19.3 There are a number of other biohazards, which can cause serious problems to health should they be, ingested or enter the body directly via an skin abrasion, cut or hypodermic needle. Examples include: HIV, hepatitis B, hepatitis C.

19.4 Managers and Supervisors will ensure that:

- Biohazards are considered whilst undertaking Risk Assessments (including void cleaning and fly tipped waste) and suitable precautions including specialist personal protective equipment (PPE) is used as a control measure to protect employees against all the biohazards identified in accordance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH), which applies to biological agents including bacteria, viruses, fungi, and parasites
- Employees are aware that they are not to move or handle hypodermic syringes / sharps, condoms, disposable nappies or other potentially contaminated biohazards. These must be treated as clinical waste and specialist contractors engaged for safe removal.
- The area where the biohazards have been found is quarantined and reported to line management.

- Line Management can only authorise clean-up work where biohazards are present if the employees are suitably equipped and trained to do so.
- Attention must be paid by employees to prevent biohazards being transferred via clothing or tools to employee's homes, vehicles or other premises.
- Waters systems are assessed, maintained and monitored to reduce the risks from legionella bacteria in accordance with the Health and Safety Executive's Approved Code of Practice L8 'Legionella bacteria: The control of legionella bacteria in water systems' and the Council's Legionella Risk Management Policy

Major Incidents

- 20.1 In response to a major incident a Major Incident Management Plan is required to ensure the Council has an agreed framework in place to respond to circumstances.
- 20.2 Without an agreed framework, the response to any major incident could be disjointed, unfocused, slow or less effective than needed. The plan is to be used in a range of different situations. It is not intended to replace emergency plans for protecting the health and safety of people, for example a fire evacuation plan.
- 20.3 The plan is designed to complement the other emergency procedures the organisation has by ensuring there is an agreed framework to respond to incidents once any immediate danger to health and safety has passed.
- 20.4 It is the role of the Chief Executive, or their deputy, to ensure that the organisation responds appropriately to any major incident.
- 20.5 Any member of staff who becomes aware of a major incident, or a situation which has the potential to be a major incident should inform a member of the Corporate Leadership Team immediately.
- 20.6 Although the plan is designed to be applied in all situations it is not possible to anticipate all the potential crises or disruptions. Therefore, the plan will never cover every action needed for a response to be effective but gives an indication of potential responses.
- 20.7 It is not always necessary to call on the whole Incident Management Team to respond. The Incident Management Team is made up of core members of staff who are expected to be involved in most instances.
- 20.8 Other Directors or members of staff may be called on – for particular expertise, knowledge or for guidance – depending on the nature of the incident.
- 20.9 Representatives of third parties may also join the team, for example from our insurers if appropriate. It is important that the Team is confident it has the necessary skills and expertise to allow them to make effective decisions in responding to a major incident. At least one deputy should be agreed for each Team Member.

20.10 This is to:

- Provide cover if the Principal Team Member is unavailable (i.e. on holiday, sick leave etc.).
- Allow tasks to be delegated to an appropriate person if it is not necessary to have all senior managers involved.

20.11 Administrative support should be available and will be responsible for logging actions agreed by the team and recording key information as it is received. This helps ensure there is one record of what has happened, what has been agreed, any actions taken or outstanding.

20.12 Regardless of the makeup of the team established to respond to any incident, it will be responsible for the following:

- Gathering information relating to the incident and assessing the potential impact on the organisation
- Assessing the options available to respond to the incident
- Deciding on the most appropriate course of action
- Turning these decisions into a clear action plan and overseeing its implementation
- Reviewing options, decisions, and actions in light of new information as it emerges

20.13 The aim is to gather facts about what has happened:

- Are the emergency services (or any other third party) involved?
 - If a third party is managing the incident who is in charge and when can you get a briefing from them?
- Are there any known injuries or fatalities?
- Has the site been evacuated, or is it being evacuated?
- Has there been damage to property or the environment as a result of the incident?
- How long is the incident likely to last?
- What critical functions and activities are likely to be affected?
- Are there any upcoming events or special circumstances that need to be factored into the decision-making process?

20.14 As the incident continues other actions should be considered:

- Decide if any specialist or operational knowledge should be brought in at this stage, for example specialist health and safety advisors, or external legal specialists
- Gather information from as many sources as necessary about what has happened,

20.15 Key areas to consider include:

20.16 The impact and potential impact on Team members and residents who may be involved in the incident

20.17 A Communications strategy for key stakeholders and statutory agencies such as the Health & Safety Executive and other interested parties such as ward councillors and MPs

- 20.18 The Council will review and test the Major Incident Management Plan annually through desktop exercises or simulations, and update the plan following any major incident or significant changes to the organisation's structure or operations.
- 20.19 The Major Incident Management Plan will be formally reviewed and approved by the Corporate Leadership Team and reported to Cabinet to ensure member-level awareness and governance oversight

Major Incident: Major community or residents health & safety incident This event response plan is to be used for an incident that has or could put at risk the health & safety of tenants or communities. For example, a gas explosion in a block of flats, or severe weather that impacts a community.

Event Response Actions to Consider:

- Contact Emergency Services incident commander or co-coordinator to be briefed on what has happened, and what others (emergency services and local authorities) are doing to respond
- If necessary, consider asking the Emergency Services if we should contribute to their incident response team
- Advise insurers and ask for formal advice on how to manage the response to the incident to reduce potential liabilities
 - Consider requesting legal advice through insurer to advise on response to incident
- Co-operate with Health & Safety Executive and other agencies as required • Assess likely impact of incident on tenants, staff team and ability to deliver critical activities
- If residents are made homeless by the incident liaise with the homelessness/housing needs team
- Inform CLT and the Cabinet of actions agreed
- Inform team members of actions agreed
- Consider arranging home visits to affected residents to assess needs and communicate the proposed next steps
- Consider needs of team involved in response. They may need counselling now or at some point in the future
- Assess workloads and priorities for team who are involved in the response and investigation

Relevant legislation

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)

Equality, diversity, inclusion, and vulnerability (including most at risk groups)

- 21.1 An Equality Impact Assessment (EqIA) has been carried out to determine whether the policy would have an impact on any member of staff, tenants, or contractor workforce, which unfairly discriminates or disadvantages them in the context of the Equality Act 2010. The EqIA will be kept under review and updated if there are significant changes to the policy or evidence of differential impact on protected groups, in accordance with the Public Sector Equality Duty under s.149 of the Equality Act 2010.
- 21.2 Whilst the EqIA has identified that there are no particular groups who will be unlawfully disadvantaged by this policy, it is identified that there are certain groups at increased risk from health and safety incidents.
- 21.3 These groups are:
- children
 - adults with learning difficulties
 - oxygen users
 - people taking certain medication
 - those suffering the effects of drugs and alcohol
 - adults aged 65 and older
 - people with disabilities
 - Individuals being supported by the Community Safety team and related support from other agencies
- 20.4 The Council will make reasonable adjustments to health and safety arrangements on request to accommodate employees, residents, or contractors with disabilities, in accordance with the Equality Act 2010, s.20. This may include: adapted PPE; alternative communication methods; additional training or supervision; modified work methods; accessible emergency procedures.
- 20.5 The Council will consult with residents, particularly vulnerable residents, where works or changes to health and safety arrangements may significantly affect their occupation or welfare, in accordance with the Regulator of Social Housing's Tenant Involvement and Empowerment Standard
- 20.6 This policy will be reviewed annually, or sooner if there are changes in legislation, HSE guidance, Regulator of Social Housing standards, or following a serious health and safety incident.