



## Health & Safety Policy

**Status: APPROVED**

<b>Policy Lead :</b>	Director of Business Support
<b>Owned By :</b>	Director of Business Support
<b>Date Approved:</b>	August 2025
<b>Approved By :</b>	BHA Board
<b>Review Date:</b>	August 2028
<b>Regulatory / Legislative Considerations/ References</b>	<ul style="list-style-type: none"><li>• Health &amp; Safety at Work Act 1974</li></ul>
<b>Other Documents to be read in conjunction with this policy :</b>	<ul style="list-style-type: none"><li>• BHA's Health &amp; Safety Toolkit, which includes all of BHA's Health &amp; Safety Procedures</li></ul>

<b>Policy Title:</b>	<b>Health &amp; Safety Policy</b>
<b>Purpose / Aim of policy:</b>	<p>Berwickshire Housing Association recognises that all individuals within the organisation have a responsibility to ensure their own safety and that of others. Consequently, all employees will have the potential to be held liable if their negligent acts or omissions result in harm being caused to any other persons.</p> <p>The following section set out the principal Health and Safety related responsibilities of individuals within the organisation.</p> <p>The management responsibilities defined within this Policy should ensure that adequate and appropriate managerial control is exercised over Health and Safety issues.</p>
<b>Scope of Policy:</b>	This policy applies to all BHA employees and any visitors to BHA premises, including members of the public, residents, tenants, visitors and contractors etc
<b>Definitions:</b>	<p>Health &amp; Safety Policy statement – a statement outlining the company's Health &amp; Safety aims, required by law, which must;</p> <ul style="list-style-type: none"> <li>• State BHA's general policy on health &amp; safety</li> <li>• Describe the organization and arrangements for carrying out the policy</li> <li>• Be brought to the notice of all employees</li> <li>• Be revised whenever appropriate and every revision brought to the attention of employees.</li> </ul>
<b>Approval Source:</b>	BHA Board
<b>Equality Impact Assessment:</b>	This policy applies to all colleagues, residents and visitors to BHA sites, regardless of any protected characteristics.
<b>Sustainability assessment</b>	This policy has minimal impact on sustainability.
<b>Partnership assessment</b>	The BHA Health & Safety Policy Statement contained in this document at section 2 is on display in our buildings and can be shared with partners if appropriate (i.e. they are visiting or working from one of our sites).
<b>Risk Implications:</b>	Failure to comply with this policy could risk financial and reputational damage to BHA, and could result in investigation by the HSE. Individuals and companies can face prosecution for health and safety violations, with potential penalties including unlimited fines and imprisonment.

## **1. INTRODUCTION**

Berwickshire Housing Association recognises that all individuals within the organisation have a responsibility to ensure their own safety and that of others. Consequently, all employees will have the potential to be held liable if their negligent acts or omissions result in harm being caused to any other persons.

The following section set out the principal Health and Safety related responsibilities of individuals within the organisation.

The management responsibilities defined within this Policy should ensure that adequate and appropriate managerial control is exercised over Health and Safety issues.

## **2. POLICY STATEMENT**

Berwickshire Housing Association (BHA) recognises that it is our responsibility to ensure the health, safety and welfare at work of our employees. This duty of care extends to other persons whilst they are on our premises or affected by our activities such as members of the public, residents, tenants, visitors and contractors etc.

It is our policy to provide and maintain safe and healthy working conditions, equipment and systems of works for all employees and third parties. BHA will do all that is reasonably practicable to prevent personal injury and damage to property. This policy also includes the general public, when they come into contact with BHA, or any of its services. Further we will provide such information, training and supervision as is needed to support the above.

The BHA Board will, so far as is reasonably practicable, in all areas in which its employees, visitors/contractors operate, maintain a safe place of work and safe working practices in accordance with the requirements of the Health and Safety at Work etc. Act 1974 and in particular by:

- a) creating, maintaining and developing a positive, fair and accountable health and safety culture which secures the commitment and participation of all employees;
- b) meeting its responsibilities to employees, tenants/residents' other people and the environment in a way which recognises that legal requirements are the minimum standard;
- c) adopting a planned and systematic approach to the implementation and operation of BHA's Health and Safety Policy to ensure, so as far as is reasonably practicable:-
  - i. the provision and maintenance of plant, machinery and systems of work that are safe and without risks to health;
  - ii. that articles and substances are used, handled, stored and transported safely and are without risks to health;
  - iii. the provision of such information, instruction, training and supervision as is necessary to ensure the health and safety at work of its employees;
  - iv. as regards any place of work under the organisation's control, the maintenance of it in a condition that is safe and without risks to health and the provision and maintenance of means of entrance and exit from it that are safe and without such risks; and
  - v. the provision and maintenance of a working environment for employees that is safe, without risks to health, and adequate as regards facilities and arrangements for their welfare at work.

- d) identifying and assessing the risks associated with all activities and services provided by BHA with the aim of eliminating or controlling the risks;
- e) allocating resources to meet the requirements of the health and safety and wellbeing.
- f) planning for safety and wellbeing including the setting of realistic short, medium and long-term objectives deciding priorities and establishing adequate performance standards;
- g) monitoring, evaluating and measuring performance through audit review on a regular basis and to ensure that remedial corrective actions are taken to ensure high standards are maintained and developed; and
- h) developing a system of consultation with health and safety representatives and representatives of employee safety and providing them with facilities and assistance to enable them to carry out their functions.

The Chief Executive appointed by BHA is delegated to act on their behalf in matters relating to the operational management of the Association. In this context, therefore, whilst maintaining the overall responsibility for the occupational health, safety and wellbeing governance of employees, visitors and contractors, the Board delegate the operational management of the same to the Chief Executive.

## **2.1 HEALTH & SAFETY RESPONSIBILITIES**

### **2.1.1 The Board**

The Board of Berwickshire Housing Association has overall responsibility for ensuring that suitable procedures for effective risk-management and compliance with legislation are established, implemented and monitored throughout the Association. Its members will ensure, as far as is reasonably practicable, the health and safety of all employees and any other persons who may be directly affected by the activities of the Association. The Chief Executive is, by position, the lead person for health and safety.

### **2.1.2 Chief Executive**

The **Chief Executive** is responsible for the implementation of BHA's policy, procedures and arrangements. The Chief Executive will also take all appropriate action to reduce the risks to Health and Safety arising from the business undertaking and to improve BHA's safety performance.

The Chief Executive has primary responsibility for:

- Ensuring that the Association's Health and Safety Policy is in place and implemented;
- Ensuring that adequate resources are allocated to safeguard the health and safety of staff, customers and visitors; and
- Informing the Board of any serious accident or incident and of any intended prosecution, improvement or prohibition notice issued by an Inspector of the HSE as soon as practicable
- The Chief Executive has delegated authority oversight of this function to the Executive Director for Business Support.
- However, the day-to-day operation remains the responsibility of all the Exec Directors and Leads within the Association

### 2.1.3 The Executive Director of Business Support

**The Executive Director of Business Support** will ensure that the H&S Policy is in place and actively implemented by

- Ensuring that all risk assessments are in place and reviewed as appropriate but no less than every 3 years
- Will, through the budget setting process ensure there are adequate funds to ensure health and safety is resourced
- Will promote positive health & safety culture
- Ensure that Health and Safety considerations are taken into account in the organisations purchasing policy, to minimise risks in the purchasing chain.
- Will lead on the Assurance Statement for the Scottish Housing Regulator
- Will lead on the Risk & Assurance Committee
- Will ensure that BHA has adequate H&S expert advice as appropriate
- Advise the Chief Executive of any serious accidents or incidents to allow the CEO to act appropriately

### 2.1.4 Exec Directors/ Directors/ Heads of Service and Leads

All **Leads** are responsible for their own teams and will organise the day-to-day work in compliance with the health & safety policy and procedures. In particular they are responsible for: -

- Undertaking all responsibilities in relation to health and safety in an open and constructive manner that places the safety and welfare of all staff, residents, tenants, volunteers and others first.
- Implementing the health & safety policy in relation to their area of responsibility, monitoring its application and ensuring its effectiveness.
- Ensuring that all hazards related to their area(s) or responsibility are identified and suitable risk assessments prepared.
- Ensuring employees are provided with information, instruction and or training including health and safety induction and workplace safety appropriate to their role.
- Alerting their Executive Director or Head of Service to any breach of health and safety that has or will place the staff, residents or others at risk and any accident resulting in a fatality or major injury.
- Ensuring, so far as is reasonably practicable, that conditions within their establishment are safe and without risk to health.
- Informing employees, residents, tenants, clients, contractors or visitors of any known hazard at the workplace, and the protective or preventative measures to be taken to minimise risk.
- Reporting and investigating all accidents and incidents as soon as possible after the incident, regardless of whether an employee, service user, client, contractor or visitor has been affected.
- Conduct regular inspections of their workplaces to ensure that safe working practices are being maintained.

- Ensuring all plant and equipment is maintained, and unsafe equipment identified and withdrawn from use.
- Working with employees to provide and maintain a safe and healthy working environment and ensure any risks identified by a member of staff are acted upon immediately.

#### **2.1.5 Director of Assets and Sustainability**

In addition to the responsibilities of all managers, the **Director of Assets and Sustainability** has specific responsibility for: -

- Maintenance and testing of all passive and active fire safety systems within all BHA assets, including temporary structures, as appropriate, (i.e. fire alarm and emergency lighting systems, portable fire extinguishers, fire doors, signage etc).
- Implementing and overseeing electrical safety arrangements in accordance with our legal obligations.
- Approving, controlling and monitoring all works and contractors that affect the fabric and services of the estate.
- Management of asbestos, legionella, water quality, heating, lighting, ventilation etc.. on all BHA sites and assets.
- The management of any other physical asset, system or procedure as directed by the Chief Executive.
- Provide assistance with issues highlighted by “housekeeping” checks and ensuring that BHA buildings provide safe working environments.

#### **2.1.6 People and Culture Lead and Compliance Manager**

The **People and Culture Lead and Compliance Manager** will support the Health and Safety Advisory Group in the day to management and administration of health and safety. Their responsibilities will include: -

- Identify needs, in conjunction with Exec Directors/ Directors/ Heads and Leads, and organise health and safety training for all staff.
- Report on safety performance, accidents, audits and inspections.
- Organise, attend and take the minutes of the Health and Safety Advisory Group and any other required safety meetings.
- Maintain a programme of risk assessments, requesting funding and resources as appropriate and as necessary to keep assessments and control measures current. Where it is perceived that personnel are, or may foreseeably become, exposed to significant risk, direction will be sought from the Health and Safety Advisory Group without delay.
- Assist the Exec Director to ensure that significant safety failures are fully investigated and reported to the Health and Safety Advisory Group, and to the appropriate enforcing authority and initiate any suitable remedial procedures to reduce the likelihood of a similar incident recurring in conjunction with the relevant Director/ Head/ Lead.

#### **2.1.7 Health and Safety Advisory Group**

There is a separate terms of reference document in place, approved by the Health and Safety Advisory Group, which sets out the membership, purpose and terms of reference.



- To demonstrate leadership and champion the health & safety agenda across the organisation.
- To ensure the safety and wellbeing of our customers, colleagues and other relevant parties by maintaining an overview of our H&S responsibilities.
- To develop and implement health & safety KPI's/metrics.
- To review audit recommendations, new legislation and best practice and agree recommendations for improvement.
- To monitor and review health & safety KPI's/metrics and progress against improvement actions.
- Ensure effective communication in relation to H & S both internally and externally.

#### **2.1.8 Employees**

All employees have a responsibility for adhering to and carrying out this policy. It is the legal duty of all employees whilst at work:

- To take reasonable care for the health and safety of themselves and other persons who may be affected by the way in which they carry out their work.
- To co-operate with their line manager or Executive Team to enable them to carry out health and safety duties.
- To report to management and supervisory staff any observations of situations, working practices or procedures which they may suspect are potentially hazardous or present a risk to health.
- To report all accident, dangerous occurrences or near misses to management.
- To use all protective clothing, equipment and materials provided for them by the group. Employees have the personal responsibility not to interfere with, misuse or misappropriate safety equipment.
- To comply with all health and safety instructions, both verbal and written.
- To use machinery, plant or equipment only following appropriate training or instruction, and with the appropriate guards or safety devices in position as detailed in the manufacturer's instructions.
- To maintain competency levels, knowledge and skills relevant to their role and responsibilities.

#### **2.1.9 Croner**

**Croner** are engaged by Berwickshire Housing Association to provide competent health and safety advice and support including: -

- Health and safety audit and premises inspections
- Support the investigation of accidents/incidents
- Review and maintain the health and safety policy and arrangements
- Attend safety meetings
- Liaison with Enforcement Agencies

### **3. PLANNING AND IMPLEMENTATION**

#### **3.1 Health and Safety Arrangements**

This policy is accompanied by a series of health and safety arrangements covering the full range of health and safety issues relevant to the operation of the Association as listed in the contents.

### **3.2 Communication and Consultation**

Berwickshire Housing Association will ensure effective communication and consultation on health and safety matters through the following means:-

- Microsoft Teams and Sharepoint
- Email Safety Alerts
- Team and staff meetings

### **3.3 Training and Competence**

Every new employee will receive induction training that will include relevant health and safety matters.

Where relevant to their role, employees will receive training on activity related risk assessments and safe systems of work/procedures.

Every employee will undertake the necessary training to ensure that relevant/appropriate industry standards and qualifications are maintained.

Individuals with responsibility for health and safety as detailed in this policy will be required to undertake health and safety training to ensure competence and this will be subject to assessment.

Training needs will be identified on an ongoing basis through one to ones and incorporated into colleague development plans. A record of all training provided will be documented and maintained.

## **4. MONITORING AND AUDITING**

The main areas of monitoring will include:

### **4.1 Accidents and Incidents**

Near misses, incidents and accidents will be monitored and investigated with a view to identifying trends and eliminating causes.

### **4.2 Workplace Inspections**

Weekly workplace inspections will be performed by relevant colleagues to ensure compliance with current legislation and the effective implementation of the policy and safety arrangements. These will be in addition to annual inspection carried out by Croner.

### **4.3 Auditing**

The appointed Health and Safety competent person (currently Croner Group Limited) will carry out annual health and safety documentation audit and property safety inspections.



## **5. REVIEW OF POLICY AND ARRANGEMENTS**

This policy and the associated arrangements will be subject to review as follows: -

- In response to changes in health and safety legislation
- Through the introduction of new health and safety legislation
- From significant learning following operation of the policy and arrangements
- In response to the findings of accident investigation
- In response to the findings of internal and external audit processes.

All records of changes to the policy and arrangements will be retained for future reference and subject to audit as required.