SP30 Health & Safety Policy

Statement of intent by the Board and Chief Executive

The Board and Chief Executive recognise the importance of health, safety, welfare and asset compliance in the successful operation of all Soha activities and accept their responsibilities as an employer and provider of services.

This policy sets out Soha's commitment to establishing and maintaining a safe and healthy working environment in which the wellbeing of employees, residents, contractors, agency workers, consultants, visitors and all others who may be affected by our activities is actively promoted, and risks of injury, ill health and loss are reduced so far as is reasonably practicable.

In fulfilling its responsibilities as a Registered Provider of Social Housing, Soha Housing is committed to meeting the requirements of the Regulator of Social Housing's Safety and Quality Consumer Standard. The Board recognises that effective health and safety governance, statutory building safety compliance and resident engagement are fundamental to providing safe homes and protecting residents, employees, contractors and others affected by our activities.

The Board also recognises its duties under the Building Safety Act 2022. Whilst Soha does not own Higher-Risk Buildings as defined by the Act, the organisation is committed to applying the principles of the legislation, including effective governance, resident engagement, management of building safety risks and maintaining accurate building safety information where applicable.

This document sets out the policy for the organisation and arrangements for health and safety across Soha Housing and Soha Response. Implementation of this policy, together with associated policies, procedures, guidance and management systems, will support continual improvement in health and safety performance.

Soha's health and safety management system is based on the principles of the Health and Safety Executive's **HSG65: Managing for health and safety**, using the **Plan, Do, Check, Act** model.

Soha's activities present a wide range of health and safety risks. It is therefore essential that we maintain an effective and proportionate health and safety management system throughout the organisation. All employees, managers, contractors, consultants and other third parties have a role to play in achieving and maintaining high standards of health and safety.

The Board will ensure that:

- a positive health and safety culture is promoted through effective leadership, training, information, instruction and supervision
- health and safety remains a key consideration in strategic, operational and commercial decisions
- adequate financial and organisational resources are made available to implement and maintain the health and safety management system

- Soha conducts its undertakings in such a way as to ensure, so far as is reasonably practicable, that employees, residents and others are not exposed to risk arising from our activities
- statutory requirements, approved codes of practice and relevant guidance are met
- effective arrangements are in place to consult with employees and, where appropriate, residents on health and safety matters
- systems are maintained to monitor, review and improve health and safety performance
- suitable buildings, plant, equipment and systems of work are provided and maintained

The Board recognises that, for this policy to be effective, the management of health and safety must be fully integrated into business planning, service delivery and resident engagement. This policy and its objectives form part of Soha's overall management system and will be reviewed at least annually, or sooner where there are significant organisational, operational or legislative changes, or where monitoring, audit or incident findings identify a need for review.

This policy will be brought to the attention of all employees and made available on the 4Policies software system.

For the purposes of this policy, "Soha Response" refers to Soha Response Ltd.

SIGNATURE	SIGNATURE
	
Chair of the Board Soha Group	Chief Executive Soha Group

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1. Introduction

This policy sets out Soha's approach to the management of health, safety, welfare and asset compliance. It explains how Soha will define responsibilities, implement arrangements and monitor performance to protect employees, residents, contractors, visitors and others who may be affected by its activities.

This policy is divided into three parts:

Policy statement – setting out Soha's commitment to complying with legal requirements and protecting the health, safety and welfare of employees, residents and others affected by its activities

Organisation and responsibilities – setting out who is responsible for delivering health and safety across the organisation

Health and safety arrangements – setting out the main arrangements and control measures used to manage risks and support compliance

Soha Housing and Soha Response sit under a shared corporate health and safety framework in relation to staff safety and wellbeing. Soha Housing, as the parent organisation, also manages health and safety matters relating to housing stock and property compliance, including but not limited to:

- asbestos
- electrical safety
- gas safety
- water hygiene and legionella
- lifts
- fire safety
- damp and mould
- general health and safety

Detailed procedures, guidance and supporting documentation sit alongside this policy on the Soha Hub / SharePoint.

2. Organisation

Soha will implement this policy in accordance with the principles of Plan, Do, Check, Act as described in HSG65.

Plan – determining the direction for health and safety

This policy provides the framework through which the Board, Chief Executive and senior leaders will direct and support effective health and safety management.

To ensure health and safety remains a priority, Soha will:

- include health and safety as a standing consideration in relevant Board, leadership, management, project and team meetings
- obtain competent health and safety advice to support compliance with legal duties and best practice

- set objectives and priorities for health and safety improvement
- include relevant health and safety responsibilities within job descriptions and performance arrangements
- ensure risks are identified, assessed and controlled in a proportionate and systematic manner

Do – delivering the plan

Soha will provide and maintain, so far as is reasonably practicable, safe places of work, safe systems of work, safe plant and equipment, and suitable information, instruction, training and supervision.

To support delivery, Soha will:

- ensure leaders and managers demonstrate visible commitment to health and safety
- carry out suitable and sufficient risk assessments and implement appropriate control measures
- develop safe systems of work where required
- consult employees on health and safety matters
- ensure procurement and contractor management arrangements assess and control health and safety risks
- provide suitable systems for reporting incidents, hazards, near misses, inspections and audits

Check – monitoring performance

Soha will monitor health and safety performance to ensure arrangements are implemented effectively and remain suitable.

Monitoring will include:

- incident, accident, near miss and hazard reporting
- inspections, audits and workplace checks
- review of training completion and competence
- action tracking and follow-up
- trend analysis and performance reporting to the Health and Safety Working Group, Senior Leadership Team and Board as appropriate

Act – reviewing performance and driving improvement

Soha Housing adopts a Three Lines of Assurance model to provide confidence that health, safety and statutory building safety risks are effectively managed.

First Line – Operational Management

Managers and operational teams are responsible for implementing safe systems of work, complying with policies and procedures, managing risks and maintaining statutory compliance.

Second Line – Compliance Oversight

The Health & Safety Team together with specialist compliance leads monitor performance, provide competent advice, undertake assurance activities and support continual improvement.

Third Line – Independent Assurance

Independent audits, specialist consultants and external regulators provide objective assurance regarding the effectiveness of Soha's Health & Safety Management System and statutory compliance arrangements.

Findings from all three lines are reported through Soha's governance framework to support continual improvement.

Health and safety performance will be reviewed regularly and formally at least annually at Board level.

The review process will consider:

- whether this policy remains suitable and aligned to Soha's priorities, operations and legal duties
- whether risk controls and management systems are operating effectively
- whether incidents, audits, inspections and performance reporting identify recurring themes or improvement opportunities
- whether corrective and preventive actions have been implemented and completed

3. Responsibilities

The effectiveness of the policy is dependent on the people who are responsible for ensuring that all aspects of work, are carried out with due consideration for safety and with minimum risk to health.

Although some duties and responsibilities maybe delegated to others according to their experience and training, accountability is not transferrable, so ultimate responsibility lies with the Chief Executive and Board.

To clarify roles and responsibilities for H&S, the following duties have been allocated to nominated employees.

Job descriptions should include H&S responsibilities and these should be reviewed during annual appraisals. Arrangements are in place for dealing with poor performance.

3.1. Chief Executive and Board

The Chief Executive (CEX) and Board have ultimate responsibility for providing effective governance of health, safety, welfare and asset compliance, within Soha Group. They are responsible for the major policy decisions and arrangements for the adequate provision of finance and resources to achieve the objectives of this policy.

The CEX and Board is specifically responsible for

- Assigning authority to the Senior Leadership Team (SLT) to monitor and review implementation of the health and safety policy
- Ensuring that the SLT members are committed to the objectives of this policy and that they support the CEX and Board in actively pursuing these objectives.
- Acting on H&S, asset compliance matters that
    - SLT members cannot resolve

  - Relate to issues outside the control of SLT
  - Form the subject of a report, complaint or concern from an statutory enforcement agency
- Approving management structure for implementing the health and safety policy and arrangements
- Ensuring that the company health and safety performance is regularly reviewed and improvements are resourced and introduced as required
- Make arrangements to review this policy annually, or when significant changes affect the implementation and, or effectiveness of this policy
- Ensuring monitoring arrangements are in place that cover the activities of Soha Group to determine the efficiency, effectiveness and reliability of the overall H&S management system and where necessary, ensure plans are implemented when corrective action is identified.
- Ensure H&S plans and objectives, highlighting initiatives and improvements are produced annually, are effectively implemented and monitored.
- Monitoring the H&S performance of SLT members to ensure they have carried out their H&S responsibilities.

3.2. Members' Forum

The Members' Forum consists of a group of engaged resident members, who meet regularly to maintain a residents view of the running of the organisation. The meetings provide a forum for residents to consult the management team regarding matters of H&S affecting Soha and its business operations.

- Annually report to the CEX and Board on H&S and asset compliance performance
- Review and comment, as appropriate on H&S policies and arrangements, before making recommendations to the CEX and Board
- Knowledge and training – It is intended for members to receive training on health and safety matters

3.3. Senior Leadership Team (SLT)

The purpose of the SLT is to set the business strategy and objectives considering relevant H&S implications. The SLT is chaired by the CEX and the meetings provide a forum to consult with SLT members on matters affecting Soha and its business operations

SLT members have senior responsibility for:

- Ensuring they make strategic business decisions that give proper consideration to all H&S implications
- Monitoring the impact of their business decisions on Soha's H&S management systems and taking appropriate action as identified
- Keeping the CEX informed of H&S matters likely to have a negative impact on Soha's' business, performance and activities as a result of their decisions
- Monitoring H&S performance
- SLT will receive a quarterly report from the Safety Champions Working Group. SLT will study the report and decide if any H&S matters from the Safety Champions Working Group should be escalated to the CEX and Board
- SLT will disseminate information from the Safety Champions Working Group to their direct reports for further distribution to Heads of Service and Team

Managers
- Approving Policies and Procedures/Arrangements that have an impact on health, safety, welfare and compliance for employees, residents and their assets
- Performing informal and formal inspections of the workplace, and consult with the staff on issues raised. Inspections are to be monitored by the Safety Champions Working Group and included within annual performance objectives

3.4. Director of Property Services

The CEX and Board has given specific responsibilities to the Director of Property Services for the corporate organisation and arrangements for H&S. This is to assist the CEX and Board to fulfil their responsibilities details in this policy.

Specific responsibilities for the Director of Property Services are:

- To ensure that the H&S compliance and asset management teams fulfil their responsibilities and ensure that the Group H&S objectives are progressed
- Provide SLT with high level monitoring of H&S performance
- To oversee the creation, auditing and review of corporate H&S documents
- To ensure effective arrangements are in place and implemented to protect the health, safety and wellbeing of employees, contractors, visitors and residents, and any other persons who could foreseeably be affected by operational activities.
- To ensure property and equipment assets are maintained and serviced as required, by statutory requirements, approved codes of practices and industry best practice.
- To ensure that 'director' responsibilities are followed for their area of service
- Ensure, adequate resources are available for the implementation of control measures identified from risk assessments and inspections and audits

3.5. Directors

They will be accountable for H&S and welfare in their service areas of responsibility

They will ensure that

- H&S objectives are included in their overall business plans
- A positive H&S culture is promoted to secure the effective implementation of this policy
- Risk assessments are completed
- Training is identified and arranged, to ensure staff are competent to undertake their duties safely
- H&S is a standing item on management and team meetings throughout their directorate
- All significant known H&S risks are communicated to SLT
- Their service complies and adheres with all H&S arrangements and associated legislation
- Their service remains abreast and are made aware of all relevant changes in H&S, legislation, technical and authoritative guidance

- Staff have access to competent and specialist H&S advice where required
- Their service engages with the Safety Champions Working Group, and all relevant actions from the Safety Champions Working Group minutes, where applicable are completed within relevant timescales
- There is an effective programme of H&S surveillance for staff where statutory provisions have identified health surveillance as a control measure
- H&S responsibilities are incorporated into individuals job descriptions
- Staff, receive appropriate information, instruction, training and supervision to enable them to undertake their duties in a safe manner
- H&S risks that can not be managed through their normal day to day operational demands are communicated to the Safety Champions Working Group for further discussion.
- Local arrangements are in place that are regularly reviewed
- They set a good example in relation to H&S

3.6. Head of Health and Safety

The Head of Health and Safety is responsible for developing, implementing, maintaining and reviewing Soha's health and safety management system and for providing competent health and safety advice across the organisation.

The Head of Health and Safety will:

- develop, implement and maintain the organisation's health and safety management system in line with HSG65 and relevant legal requirements
- ensure health and safety policies, procedures and arrangements are reviewed and kept up to date
- monitor relevant legislation, guidance and regulatory developments and advise the business accordingly
- keep the Director of Property Services and Senior Leadership Team informed of significant health and safety issues, risks and trends
- prepare and present health and safety performance information, including incident and audit trends, to relevant governance forums
- ensure suitable arrangements are in place for the reporting, recording, investigation and review of accidents, incidents, hazards, dangerous occurrences and near misses
- develop and maintain an assurance programme to monitor compliance with health and safety policies, procedures and statutory requirements, reporting findings, trends and areas of non-compliance to the Director of Property Services, Senior Leadership Team and Board.
- oversee statutory reporting to enforcing authorities where required, including reporting under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- ensure suitable arrangements are in place for inspections, audits and monitoring, and that findings are escalated and tracked to completion
- work with managers and Human Resources to support the completion and review of suitable and sufficient risk assessments
- ensure appropriate arrangements are in place for first aid, fire marshals and emergency planning
- promote awareness of health and safety across the organisation
- work with relevant service leads to support compliance in key property-related risk areas including fire, gas, electrical safety, water hygiene, asbestos, lifts and damp and mould

- support the management of health and safety risks associated with contracted and directly delivered works

3.7. Head of Human Resources

The Head of Human Resources will:

- work with the Head of Health and Safety to ensure Soha provides suitable health, safety and wellbeing training for staff
- support managers in ensuring health and safety responsibilities are reflected in job descriptions and induction arrangements
- support the investigation and management of incidents where employment, wellbeing, conduct or capability issues arise
- support referrals to occupational health and other employee support services where appropriate
- ensure HR representation at the Health and Safety Working Group
- support the maintenance of relevant training and employee health-related records in accordance with legal and organisational requirements

3.8. Head of Asset Management

- Ensure Soha complies with all property related H&S legislation and regulations
- Including but not exclusively, asbestos, gas, electrical, fire and water/legionella safety

3.9. Heads of Service

The Heads of Departments, within their remit of responsibility shall

- Demonstrate and pursue high H&S standards
- As identified, create, implement and monitor local H&S policies and procedures/arrangements
- Drive improvements in H&S standards in their area of responsibility
- Ensure risk assessments are in place in the service delivery areas they are responsible for, and staff have been briefed on the contents of the risk assessments.
- Ensure risk assessments are periodically reviewed and monitored
- Monitor day-to-day compliance with health and safety procedures within their service areas through supervision, workplace observations, inspections and review of working practices, taking corrective action where non-compliance is identified
- Keep up to date with relevant changes in H&S legislation, standards and good practice relevant to their service area
- Detail employees H&S responsibilities within their job descriptions
- Assess the competence of employees to undertake their roles
- Detail specific H&S participation necessary by employees in their service area
- Communicate H&S changes and developments to their employees
- Identify and keep H&S records, where these are not maintained by other service areas
- Ensure all incidents are adequately investigated with appropriate remedial actions taken
- As appropriate, participate in the Safety Champions Working Group

- Implement actions required by SLT

3.10. Line Managers

Line managers at all levels have specific responsibilities for managing health and safety within their areas of control.

Line managers will:

- identify hazards and ensure suitable and sufficient risk assessments, COSHH assessments and local control measures are in place and reviewed
- ensure employees are provided with suitable information, instruction, training, supervision, equipment and personal protective equipment as required
- encourage and support the reporting of hazards, near misses, unsafe conditions, incidents and accidents
- ensure all accidents, incidents, near misses and hazards are reported promptly through Soha's approved reporting system
- undertake or support incident investigations proportionate to the level of risk and actual or potential severity
- ensure remedial and corrective actions are implemented within agreed timescales
- complete health and safety induction arrangements for new starters
- support display screen equipment assessments, occupational health referrals and other wellbeing-related adjustments where required
- monitor local health and safety performance and address non-compliance promptly
- lead by example and promote a positive health and safety culture

3.11. Soha employees including, contract, temporary and agency

All employees, regardless of role or seniority, have a duty to take reasonable care of their own health and safety and that of other persons who may be affected by their acts or omissions.

Employees must:

- cooperate with Soha in relation to health and safety matters
- follow safe systems of work, policies, procedures, instructions and training
- use plant, equipment and personal protective equipment correctly
- report hazards, unsafe conditions, accidents, incidents, dangerous occurrences and near misses promptly using the approved reporting process
- stop work and seek advice where they believe work cannot be carried out safely
- not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare
- read and comply with this policy and relevant supporting procedures
- make suggestions that may improve health and safety standards
- Failure to comply with this policy may result in action being taken in accordance with Soha's disciplinary procedures.

3.12. Safety Champions Working Group

In accordance with the Health and Safety (Consultation with Employees) Regulations 1996, Soha will maintain a Health and Safety Working Group to support consultation, communication, monitoring and continual improvement.

The Working Group will meet quarterly, or more frequently where required, and will include representation from relevant parts of the organisation.

Its membership may include:

- Director of Property Services, or nominated representative
- Head of Health and Safety
- representatives of the Senior Leadership Team
- representatives from Soha Response management and/or supervision
- employee representatives
- trade union representatives, where applicable
- resident representative(s), where appropriate

The Working Group will:

- review health and safety performance, including trends arising from incidents, near misses, hazards, inspections and audits
- review the effectiveness of policies, procedures and arrangements
- consider changes in legislation, guidance and best practice
- monitor completion of corrective actions arising from incidents, audits, inspections and Working Group actions
- provide a forum for consultation with employees on health and safety matters
- escalate significant issues and recommendations to the Senior Leadership Team and Board as appropriate
- support the development and sharing of good practice across the organisation
- Minutes and action logs will be maintained and made available to relevant employees.

3.13. Contractors

All contractors will be expected to comply with this H&S Policy, and their own H&S policy and safety management system. All contractors will be assessed for their compliance with H&S legislation.

All contractors must:

- Provide a copy of their H&S Policy for review, prior to works being awarded
- Comply with Soha's H&S rules, construction phase plan and associated information and guidance
- Work in accordance with statutory provisions and take into account the safety of others
- Ensure risk assessments and method statements (RAMS) are suitable and sufficient and communicated to staff before undertaking works. Provide RAMS to Soha as requested.
- Ensure adequate supervision is provided
- Ensure plant, equipment and tools are safe and in a good working order
- Ensure staff are adequately trained and where required provide evidence of training to Soha
- Inform Soha of any incident that occurs whilst undertaking work for Soha
- Work in accordance with Soha site rules
- Comply with, the Construction (Design and Management Regulations) all relevant legislation and with their H&S contract obligations

Relevant Contract Managers, Contract Administrators and Project Managers are responsible for monitoring contractor compliance with Soha's health and safety requirements throughout the duration of works. This includes reviewing competency, monitoring site performance, undertaking inspections, reviewing RAMS, addressing non-compliance and taking appropriate action where standards are not met. The Head of Health and Safety will provide independent assurance of contractor management arrangements through audits, inspections and monitoring activities where appropriate.

3.14. Multi-occupancy buildings

In buildings where Soha share it with other organisations, the responsibility for H&S depends on mutual agreements, leasehold/tenant agreements and landlord duties.

3.15 Duty Managers (Royal Scot House)

Duty Managers are designated on a rota coordinated by Human Resources and are responsible for providing a consistent on-site management presence at Royal Scot House during normal working hours.
Duty Managers will be drawn from a range of managers across the organisation and are not limited to senior management roles.
The Duty Manager is responsible for:

- Remaining on site at Royal Scot House for the duration of their allocated duty period
- Acting as the nominated responsible person for day-to-day operational issues and incidents arising within the building
- Responding to emergencies, including fire alarms, incidents involving visitors or residents, and other unforeseen events
- Supporting the safe management of the reception area, which is open to members of the public, including residents who may present challenging behaviour
- Taking a lead role in the event of an evacuation, acting in a Fire Marshal capacity where required and supporting the safe and orderly evacuation of the building
- Liaising with emergency services and internal stakeholders as necessary during incidents
- Ensuring appropriate cover arrangements are in place if they need to temporarily leave the building during their duty period (e.g. lunch breaks)

Duty Managers are required to complete appropriate training to support their role, including Fire Marshal training, which will be assigned and monitored via the Atlas training system.

4. Health and Safety Arrangements

This section details the arrangements that we will use to help implement our Health and Safety Policy and ensure compliance with current Health and Safety Legislation.

4.1. Supplementary H&S Policies & Guidance

This policy is supported by a number of supplementary policies, guidance and procedures, which address specific H&S issues or topics. All H&S documentation is available on Soha Housing and Soha Response's H&S hub.

- Asbestos Policy
- Fire Safety Policy

- Legionella Management Policy
- Damp and Mould Policy
- Driving Safely Policy
- Gas Safety Policy
- Electrical Safety Policy
- Lift Safety Policy
- Pest Policy

4.2. Accident reporting

Soha requires all accidents, incidents, near misses, dangerous occurrences, work-related ill health events and identified hazards to be reported promptly.

Mitti (formerly known as SafetyCulture) is Soha's corporate platform for the reporting and recording of:

- accidents and incidents
- near misses
- hazards and unsafe conditions
- dangerous occurrences
- inspections and audits
- corrective and preventive actions
- All employees are required to report relevant events through Mitti as soon as reasonably practicable after the event or discovery. Where urgent risk is identified, employees must also notify their line manager immediately so that immediate action can be taken to make the situation safe.
- All reports will be reviewed and, where necessary, investigated at a level proportionate to the actual or potential severity of the event. Investigations will identify immediate, underlying and root causes where appropriate, and corrective actions will be assigned, monitored and tracked to completion.
- The Head of Health and Safety will oversee organisational monitoring of incident data, identify trends and ensure learning is reported to the Safety Champions Working Group, Senior Leadership Team and Board as appropriate.
- Where an incident meets the reporting criteria under **RIDDOR**, the report will be made to the relevant enforcing authority by, or under the direction of, the Head of Health and Safety in accordance with statutory requirements.
- Relevant risk assessments, safe systems of work and procedures will be reviewed following incidents, near misses or dangerous occurrences where learning indicates that changes are required.

4.3. Asbestos

Soha will comply with the Health & Safety at Work etc. Act (HSWA), the Control of Asbestos Regulations (CAR), Approved Codes of Practice and related Guidance.

Any asbestos removal works, must be carried out by persons who have received the proper training and who have the necessary prospective equipment. All non-domestic buildings built before the year, 2000 must have an asbestos management survey. If any works are required to the fabric of a building, then a refurbishment or demolition survey must be undertaken. Soha will instruct competent persons to undertake these risk assessments and surveys, and asbestos awareness training will be provided for all staff as identified on the training matrix. A register will be maintained and residents will be provided

with details of any known asbestos and its location in their homes at the start of their tenancy.

Soha will take all reasonable and practical measures to prevent the exposure of employees, tenants and members of the public to asbestos fibres when visiting, living and/or working within any properties owned or rented by Soha

Soha's arrangements are available on SharePoint.

4.4. Asset Compliance

Safety and Quality Consumer Standard

As a Registered Provider of Social Housing, Soha Housing is committed to meeting the requirements of the Regulator of Social Housing's Safety and Quality Consumer Standard. The organisation recognises its statutory responsibilities as a landlord to ensure that tenants' homes are safe, well maintained and comply with all applicable legal and regulatory requirements throughout the tenancy.

To achieve this, Soha operates a Building Safety Compliance Framework supported by dedicated policies and procedures covering fire safety, gas safety, electrical safety, asbestos management, water hygiene, lift safety, damp and mould and other statutory compliance disciplines.

These arrangements are supported through effective governance, competent persons, contractor management, performance monitoring, resident engagement, robust record keeping and independent assurance to provide confidence that statutory obligations are consistently achieved.

4.4.1 Building Safety Compliance Framework

Soha Housing operates a Building Safety Compliance Framework to ensure that statutory obligations relating to the safety of its homes and buildings are effectively managed throughout the property lifecycle. The framework provides a consistent and proportionate approach to the planning, delivery, monitoring and assurance of statutory compliance activities, supporting the organisation's responsibilities as a Registered Provider of Social Housing.

The framework comprises a suite of specialist compliance policies, procedures and supporting guidance covering key areas of landlord responsibility, including fire safety, gas safety, electrical safety, asbestos management, water hygiene, lift safety, damp and mould, and other statutory compliance disciplines. These documents define the standards, responsibilities and operational arrangements required to achieve and maintain compliance with legislative, regulatory and recognised industry best practice requirements.

Operational delivery is supported by documented procedures, process maps, technical guidance, standard operating instructions and approved forms to ensure that statutory inspections, testing, maintenance, remedial works and record management are undertaken consistently across the organisation.

The effectiveness of the Building Safety Compliance Framework is monitored through planned inspections, internal audits, independent technical assurance, contractor performance monitoring and regular management review. Performance information, compliance trends, significant risks and improvement actions are reported through Soha's governance

arrangements, including the Safety Champions Working Group, Senior Leadership Team and Board, providing assurance that statutory duties are being effectively discharged.

The framework is founded on the principles of continual improvement. Lessons learned from incidents, audits, inspections, complaints, regulatory change and resident feedback are used to review and strengthen policies, procedures and operational arrangements, ensuring that the organisation continues to improve the safety of its homes and services.

In accordance with the Building Safety Act 2022, Soha Housing is committed to maintaining an accurate and accessible Golden Thread of safety information. This includes maintaining reliable records of statutory inspections, testing, maintenance, remedial works, risk assessments, certification and compliance activities to demonstrate that building safety risks are effectively identified, managed and monitored throughout the lifecycle of its properties.

4.5. Bird Fouling

There are potential risks to personnel when working in and around bird droppings or debris. It is also a risk to the occupants of the building especially when the nesting area or droppings are in or around the air conditioning system. Diseases from such substances include Ornithosis and Chlamydia Psittaci which cause flu like symptoms, hospitalization and even death. Active roosts present the greatest danger and will prevent work being carried out.

When, it is foreseeable that staff will be working around droppings and debris a risk assessment will be undertaken to a identify the required control measures.

4.6. Blood Bourne Viruses (BBVs)

As an employer, Soha has a duty to assess the risk of work activities. If the activity produces a known risk of infection, precautions must be in place to protect employees' health.

These viruses can be found in body fluids. In particular, the fluids that Soha employees and sub-contractors may be in contact with include urine, feces, saliva, sputum, sweat, tears and vomit. Although these fluids carry a minimal risk of BBV infection, care should still be taken. The main BBVs of concern are:

- Hepatitis B virus (HBV), hepatitis C virus and hepatitis D virus, which all cause hepatitis, a disease of the liver.
- Human Immunodeficiency Virus (HIV) which causes Acquired Immune Deficiency Syndrome (AIDS), affecting the immune system of the body.

Some jobs may mean coming into contact with raw sewage (plumbing, property maintenance works). Other types of work or activities where there may be contact with blood/body fluids include:

- Disposing of waste into skips (needles may be thrown into skips, therefore no one should get into a skip or grab anything out of the skip);
- Providing first aid;
- Plumbing works

Safety measures can help prevent infection, mostly transmitted by hand to mouth contact, during eating or smoking, or wiping the face with contaminated gloves. Wash hands thoroughly after working in the area, cover all cuts and grazes before working, take rest breaks away from the working area, wear protective clothing and gloves, avoid hand /mouth

contact, use anti-bacterial soaps.

When providing first aid, the first aider must wear sterile nitrile gloves, and must check that there are no holes in the gloves. First aiders must always wear gloves to protect themselves and the casualty.

Hepatitis A has the most severe impact and is contracted through faeces. Blood and bodily fluids transmit Hepatitis B and C. 'B' can be life threatening but also carriers often show no symptoms but are still contagious. Hepatitis C carriers can carry the virus for 20 Years before any problems arise.

Specific legislation on hazards that arise from working with biological agent such as BBVs is contained in the Control of Substances Hazardous to Health Regulations 2002. A good source of guidance can also be found in the HSE leaflet INDG342 Blood Born Viruses in the Workplace: Guidance for Employers and Employees.

4.7. Consultation and Communication

Soha recognises the importance of effective consultation and communication in the management of health and safety.

Soha recognises that residents are key stakeholders in maintaining safe homes.

Residents will be:

- provided with clear safety information
- consulted where appropriate
- encouraged to report hazards
- supported through reasonable adjustments
- informed about statutory compliance activities affecting their homes

Soha will consult employees, and where appropriate their representatives, in good time on matters affecting their health and safety, including:

- the introduction of new technology, equipment or working methods
- arrangements for appointing competent persons
- information required to be provided under health and safety legislation
- health and safety training needs
- changes to relevant policies, procedures and risk controls
- Consultation will take place through line management, team meetings, the Safety Champions Working Group, direct engagement and other communication channels as appropriate.
- Soha will communicate health and safety information through a range of methods, including:
- policies and procedures on the Soha Hub / SharePoint
- briefings, toolbox talks and manager-led discussions
- training and induction
- newsletters and internal communications
- working groups minutes and action updates
- incident learning and safety alerts where appropriate

4.8. Control of Noise at Work

All tasks and work activities will be planned and arranged to the Noise at Work Regulations, and relevant British Safety Standards and industry guidance into account.

Soha will procure and hire, plant and equipment which takes into account the effects of noise on workers, general public and the end users of the property. Measures will be implemented to reduce noise to levels considered to be safe, if this is not practicable, suitable hearing protection must be identified and provided to staff. Regular noise monitoring of noise levels and frequences will be planned as required.

All Soha Response employees must undertake the company hearing loss self-assessment form during induction.

The process supporting the above can be accessed on SharePoint.

4.9. Control of Vibration at Work

Soha, will comply with its duties under the Control of Vibration at Work Regulations, as part of its risk assessment procedures. All activities which may place operatives at risk of exposure to vibration will be thoroughly assessed by a competent person and alternative methods of work will always be considered.

There are 2 main forms of vibration hazard they are:

> **Hand-arm Vibration (HAV) –** Hand transmitted vibration from tools, equipment and certain processes that produce vibration.
>
> **Whole Body Vibration (WBV)** – Vibration that is transmitted to the body through the seat of the plant or the feet of the operative.

Soha are committed to providing a safe and healthy working environment for all employees and those affected by our activities. Operations are to be carried out, so as to ensure, so far as is reasonably practicable, that the health and safety of any employee will not be adversely affected. Arrangements associated with this policy set out how the organisation will comply with the Control of Vibration at Work Regulations

4.10. Contractor Management

Potential and existing trade/specialist contractors and consultants will be assessed at pre-tender stage and regularly throughout the Contract by the Contract Administrator for competence, to undertake their work in accordance with health and safety requirements. Only contractors who are assessed to be competent will be engaged to carry out work for Soha.

All contractors will be given access to relevant Health and Safety documentation (refer to the Contractor Management procedure), or have it issued to them where necessary. Trade contractors will be required to comply with the Construction (Design & Management) Regulations and identify significant hazards, prepare risk assessments and, where appropriate, method statements for the work they are required to carry out. The process supporting the above can be accessed on SharePoint. Management of contractors involved in maintaining Asset Compliance are referred in that section of this Policy.

4.11. Construction (Design and Management) Regulations (CDM)

Soha will comply with the CDM regulations. Depending on contract terms Soha could be the Client, for construction, repair and maintenance projects outsourced by Soha Housing to competent contractors. In order to fulfil the company's client responsibilities, the Director of Property Services, with advice from the Head of Health and Safety, will appoint a competent, Principal Designer to oversee any construction, repair and maintenance project from inception and throughout the construction phase to completion. Where in-house competence exists to manage a CDM project the Director of Property Services will ensure compliance with the CDM Regulations, and Projects will be notified as applicable.

Soha Housing, will appoint Soha Response as the Principal Contractor (PC) and Soha Response, will comply with all PC requirements.

4.12. Control of Substances Hazardous to Health (COSHH)

Soha will comply with legislation as set out in the Control of Substances Hazardous to Health Regulations (COSHH). Before work starts, the relevant supervisor or manager, will ensure adequate control measures are in place, or are implemented ahead of the substance being used.

If a Soha Contractor required the use of hazardous substance, the relevant Contractor is responsible for ensuring there are adequate control measures in place or are implemented ahead of the new substance being used

Where there is a risk of exposure to hazardous substances in the workplace, an assessment will be carried out to identify the nature and level of risk. Wherever possible, risk of exposure to hazardous substances will be eliminated or, where this is not possible, measures will be implemented to minimise and control the risk.

The process supporting the above can be accessed on SharePoint

4.13. Co-ordination

Soha will ensure that health and safety management is co-ordinated to ensure that:

- resources are allocated appropriately, and necessary training provided
- policy, procedures and safe working practices are consistent and standardised wherever possible
- best practice is shared
- duplication of effort is avoided.

Director of Property Services will be jointly responsible for this co-ordination.

4.14. Display Screen Equipment

Soha will take all reasonable steps to secure the health and safety of employees who work with display screen equipment (DSE) whether in the office environment or elsewhere.

Soha acknowledges that health and safety hazards may arise from the use of this equipment. It is therefore Soha intention to ensure that any risks are reduced to a minimum. Whilst it is generally recognised that DSE can be used without undue risk to health, it is appreciated that some employees may have genuine reservations and concerns. To manage the potential risks and concerns, Soha provide a recognised software package providing training to employees that also helps the employee to assess the risks presented by incorrect use of equipment and furniture related to the use of

computers. The process supporting the above can be accessed on SharePoint.

4.15. Documentation

Soha will maintain health and safety documentation appropriate to its activities and legal duties. Relevant documents will be made available to employees through the Soha Hub / SharePoint, notice boards, local safety folders and other appropriate means.

Documents and records may include:

- the Health and Safety Policy
- local arrangements and procedures
- risk assessments and safe systems of work
- fire procedures and emergency information
- inspection and audit records
- first aid information
- statutory certificates and notices
- training and competence records
- incident and investigation records
- working groups agendas, minutes and action logs

Health and safety records will be retained in accordance with legal, regulatory and organisational requirements.

Health and safety documentation will be maintained in accordance with the principles of the Building Safety Act 2022, ensuring that relevant safety information is accurate, accessible, current and capable of providing assurance regarding the management of building safety risks throughout the lifecycle of Soha's properties.

4.16. Driving at Work

Soha employs staff that need to drive during their work and are committed to reducing the risks that may be created as a result, whether you are using a company, your own or a hired vehicle. Anyone driving for work must always obey speed limits. Managers must lead by example, both in the way they drive themselves and by not tolerating poor driving practice by others. Processes are in place to ensure the vehicles owned by Soha and driven by staff are roadworthy and subject to regulatory tests (MOT) and serviced/maintained in accordance with the manufacturers' recommendations. Processes are in place to ensure that Soha drivers are qualified to drive the vehicles and maintain qualification through annual license checks. The process supporting the above can be accessed on SharePoint.

4.17. Drugs and Alcohol

Where staff recognise that they may require confidential advice or guidance on the misuse of drugs and alcohol, they should contact their manager or HR in the first instance. Where staff are, or are suspected of being, either under the influence of drugs or alcohol, or suffering from the effects of drug or alcohol usage at work, their behaviour may result in disciplinary action. Further information and support available can be found in Soha's Employee Wellbeing policy, available on SharePoint Any staff or visitors found to be under the influence of drugs or alcohol on Soha property will be required to leave the building.

4.18. Electrical Safety

Staff and contractors, must not interfere with any electrical equipment in the workplace (other than operating machines correctly and for their designed purpose) unless specifically authorised to do so, e.g. electrical engineers and IT.

Soha will take all reasonable steps to ensure a safe working environment for Soha employees, residents, contractors, visitors, and other persons on Soha premises. Electrical risks must be assessed and controlled by the use of:

- Statutory inspections and testing of portable electrical appliances, by a competent person
- 5 yearly statutory inspection and testing of fixed installations will be tested and certified in accordance with the current/relevant edition of Institute of Electrical Engineers (IEE) Regulations for Electrical Installations
- Any power tools used, for example drills are to be low voltage and must be inspected and maintained. Portable appliances will be tested in accordance with Institute of Engineering and Technology (IET) Guidance.
- Prohibition of any employee to access live electrical installations

Employees are required to visually check any equipment that they use and report any defects noted to:
Faults with office equipment to be reported to Office Services or IT Helpdesk
Estates operatives should report any faults with this equipment to the Estates and Neighbourhoods Manager
Soha Response operatives should report any faults to their Supervisor
Electrical items will be included on a PUWER register.
Soha will seek to mitigate any risk associated with electrical works across the organisation and set out clear roles of responsibility for electrical safety complying with all relevant electrical safety legislation applicable to those premises owned and occupied by Soha.

Employees are prohibited from bringing any private electrical equipment into work. For employee work tasks involving the use of electrical equipment see risk assessments.

The process supporting the above can be accessed on SharePoint.

4.19. Emergency Procedures (offices)

In the event of the fire alarm being activated, or in any other emergency situation, all employees must leave the office by the nearest signed exit and assemble at the designated assembly point, unless instructed otherwise by emergency services or evacuation marshal. Practice evacuations will be conducted at least twice per year to ensure familiarity with emergency evacuation procedures. Evacuation procedures will be displayed in the building and communicated to all employees, visitors and contractors. In the event of an emergency occurring, you should observe the following procedure:

- evacuate the building in an orderly fashion as directed by evacuation marshal
- make your way to designated assembly point
- await further instructions arising from the implementation of the emergency response procedures. If the building is seriously damaged or not available because of a major emergency which occurs either outside normal office hours or at any other time when you are not present, you should await further information.

4.20. Environment

A lot of Soha work activities can generate conditions that are detrimental to the environment. These work activities must comply with the Environmental Protection Act and not cause any effects to the surrounding environment. Work activities may include:

- Concrete and cement being washed into watercourses
- Vehicle movement – oil spillage and destructive capabilities
- Petroleum storage – bund around tanks
- Use of aerosols and other substances that harm the environment
- Waste disposal to land fill – Waste Management Plans

Every person at Soha has a duty of care when it comes to the environment. All our work activities should be done with the environment in mind. The examples above are only a few of the possible effects we as a company may have on the environment. Other effects include leaving lights and computers on in the office, burning materials (which is illegal) and releasing toxic gases into the atmosphere. For further guidance and advice please refer to the Soha Environmental Policy.

4.21. Fire Safety – Royal Scot House

Fire represents a significant hazard to health and safety in all premises. The Director of Property Services is the person with overall responsibility for the provision and maintenance of fire prevention and detection equipment in Royal Scot House. A fire risk assessment will be carried out for Royal Scot house, and where applicable additional fire risk assessments will be undertaken for work undertaken by Soha Response. Managers are responsible for keeping their work areas safe from fire by promoting good housekeeping practices, reducing the storage of combustible materials near to means of ignition e.g. power sources, laptop/phone chargers. The people responsible for testing and maintaining the fire alarm system, emergency lighting, fire call points and fire extinguishers are engaged by the Head of Asset Management. Office Services will arrange for a fire alarm test to be carried out every week at Royal Scot House and ensure it is recorded. The test will be carried out at 08:00 am regularly. A practice fire evacuation will take place twice a year, and the results will be recorded.

Duty Managers will act as Fire Marshals and will review the effectiveness of the drill with the Head of H&S. The Director of Property Services is responsible for carrying out periodic inspections of the fire precautions. These checks are recorded.

4.22. Fire Safety

Soha will comply with the Regulatory Reform (Fire Safety) Order, Fire Safety Act and BS999: Code of Practice for fire safety carry out regular Fire Risk Assessments of its schemes and blocks of flats with internal communal areas, and fire door inspections. Take all reasonable steps to ensure a safe working and living environment for all Soha employees, residents, contractors, visitors and other persons on premises under the control of Soha; Put in place all reasonable and practical measures to ensure the effective management of fire safety and proactive control of fire risk within and around its premises; Set out clear roles of responsibility for fire safety within the organisation; Comply with all relevant fire safety legislation applicable to those premises owned and occupied by Soha; Positively seek to reduce the likelihood of fires occurring at any premises owned and occupied by the Soha; Minimise the impact of a fire at any premises owned or occupied by Soha, on personal safety, property, finance, business continuity, delivery of service, and the environment.

We will also adhere to the building regulations in accordance with fire safety for means of warning, escape routes; internal and external fire spread.

4.23. First Aid

Qualified First Aid at Work (FAW) persons and Emergency First Aid at Work (EFAW – formerly Appointed Persons) will be provided at Royal Scot House, and where determined by a first aid needs assessment additional mobile staff will be identified and trained. The names and locations of the persons are posted on notice boards. First aid competence is managed by either the Head of HR (Royal Scot House) or the Estates Neighbourhood Manager (Estates minor repairs) or Director of Property Services for Surveyors/Housing Officers. Certificates should be renewed before they expire. Appropriate levels of first aid equipment in all work areas is determined by risk assessment, a first aid box will be provided in all void properties and all Soha Response vans. Contractors are responsible for compliance with their first aid risk assessments and providing first aid to their employees.

4.24. Gas Safety

Soha will comply, with The Gas Safety (Installation and Use) Regulations (GSIUR) thereby ensuring the safety of our tenants; Implement regular maintenance and servicing of gas equipment within its properties is of paramount importance in ensuring the safety of our residents. We recognise the potential dangers posed by gas and gas fired appliances and therefore treats gas safety as a fundamental objective. Soha has a target of obtaining 100% current gas certificates serviced within a 12-month period; Ensure that all our gas appliances are checked and serviced annually using approved Gas Safe registered personnel in accordance with the GSIUR. Soha will also comply with the Health & Safety at Work etc. Act 1974 (HSWA); Implement gas safety procedures to complement this policy which explains our approach, in particular to “no access” issues, breakdowns, quality checks, gas leaks, void properties and the mechanism by which data is recorded.

4.25. Hazard Reporting

Soha encourages all employees, contractors and others working on its behalf to be observant and to report hazards, unsafe conditions and unsafe acts promptly so that action can be taken before harm occurs.

Hazards and unsafe conditions identified in connection with employee activities, workplaces, work equipment, contractor operations, communal areas, offices, schemes and general health and safety matters must be reported through **Mitti** in accordance with Soha’s reporting arrangements.

Hazards identified **within residents’ properties** that relate to housing conditions, disrepair or matters falling within the **Housing Health and Safety Rating System (HHSRS)** must be reported through the **HHSRS Hazard App** in accordance with Soha’s housing hazard reporting arrangements.

Where a hazard presents an immediate or serious risk, the employee must also notify their line manager, or another responsible manager, without delay so that immediate control measures can be implemented and any urgent safeguarding, repair or escalation actions can be taken.

All reported hazards will be reviewed, risk assessed where necessary, and appropriate corrective actions allocated and tracked through to completion through the relevant corporate system.

4.26 Soha Response – Operational Health & Safety Arrangements

Soha Response delivers responsive repairs, maintenance, void works and construction-related activities across a diverse housing portfolio, including occupied premises and homes with vulnerable residents.

These activities present a higher level of operational risk and are managed through specific arrangements aligned with the Construction (Design and Management) Regulations 2015 and relevant health and safety legislation.

Soha Response will:

- Plan, manage and monitor works in accordance with CDM duties, including acting as Principal Contractor where applicable
- Implement proportionate risk management arrangements for short-duration and dispersed works
- Ensure operatives are competent, trained and equipped to work safely in occupied homes and live environments
- Maintain effective supervision, inspection and assurance processes across all work activities
- Manage contractor competence, selection and monitoring through robust pre-qualification and performance review processes
- Ensure risks to residents, visitors and members of the public are identified and controlled
- Maintain effective arrangements for safeguarding, lone working and dynamic risk assessment
- Ensure hazards identified during works (including damp and mould, asbestos, structural concerns or safeguarding risks) are reported and escalated appropriately

4.27. The Safety Champions Working Group

The roles and responsibilities of the Safety Champions Working Group members are documented in the Terms of Reference and under ‘Health and Safety Roles and Responsibilities’. The Safety Champions Working Group will meet bi-monthly, to discuss current safety matters, suggested proposals for change in H&S management and future developments. Attendees should include representatives from relevant departments.

Minutes will be prepared and distributed by the Health and Safety Coordinator. Terms of reference and Safety Champions Working Group constitution can be accessed on the health safety SharePoint page.

4.28. The Fire Safety Working Group

The Fire Safety Working Group provides a dedicated forum to support, oversee, and continuously improve fire safety across Soha Housing and Soha Response. The group brings together colleagues from across the organisation as well as residents to share expertise, review fire safety performance, and ensure our arrangements remain robust, compliant, and resident-focused.

The group plays a key role in:

- Monitoring fire safety compliance and performance across our homes and workplaces
- Reviewing Fire Risk Assessment findings, trends, and emerging risks
- Supporting implementation of new and changing fire safety legislation and guidance
- Promoting best practice, learning from incidents, and continuous improvement
- Strengthening assurance to senior management and the Board that fire risks are being effectively managed

By working collaboratively, the Fire Safety Working Group helps ensure that fire safety remains a shared responsibility and a core part of how we protect residents, colleagues, and our buildings.

4.29. Safety & Welfare Action Group

Soha has established a Safety & Welfare Action Group to support the identification, review and management of risks relating to staff safety and wellbeing, with particular focus on resident-facing roles.

The group consists of representatives from across the organisation and provides a forum for staff to raise concerns, share experiences and contribute to the development of practical safety solutions.

The Safety & Welfare Action Group also provides organisational oversight of the Unacceptable Behaviour Policy, including monitoring its implementation, effectiveness and application across the organisation to ensure that staff are appropriately protected from abuse, aggression, violence and other unacceptable behaviours.

The Safety & Welfare Action Group will:

- Review incidents, near misses and emerging risks affecting staff safety and welfare.
- Consider risks associated with lone working, community-based roles and interactions with residents or members of the public.
- Support the development and review of risk assessments and safe systems of work.
- Make recommendations on appropriate control measures to reduce risk to staff, which may include the provision of personal safety equipment where justified.
- Promote a proactive and supportive safety culture across the organisation.
- Oversee the implementation and effectiveness of the Unacceptable Behaviour Policy, including reviewing trends, monitoring outcomes and making recommendations for improvement where necessary.
- Review incidents involving abuse, aggression, threats or violence towards staff and ensure that appropriate control measures and organisational responses are considered.

All recommendations made by the group will be considered by senior management and, where appropriate, implemented through existing health and safety arrangements.

4.30. H&S Systems and processes

Soha uses a range of systems to support compliance with health, safety, welfare and asset compliance requirements. These include:

Mitti – the corporate platform for reporting and managing accidents, incidents, near misses, workplace hazards, inspections, audits and corrective actions

HHSRS Hazard App – the corporate platform for reporting hazards identified within residents' properties that relate to housing conditions, disrepair and Housing Health and Safety Rating System (HHSRS) matters

Atlas – mandatory online H&S training portal

Continuum – driver safety portal

SoloProtect – lone worker protection system

These systems may be supplemented, changed or replaced from time to time in line with business need, provided suitable governance, communication and training arrangements are put in place.

Compliance information generated through these systems supports the Golden Thread of safety information and provides assurance regarding statutory compliance, operational performance and continual improvement.

4.31. Health Surveillance

Soha, will ensure that all employees are provided with health surveillance if deemed appropriate, due to hazards identified by detailed risk assessments. The primary benefits of, and therefore the objective, of health surveillance will be to detect adverse health effects at an early stage, enabling further harm to be prevented. Once it has been decided that health surveillance is appropriate, it will be maintained during the employees employment unless the risk to which the worker is exposed and associated health effects are short term. Health surveillance will be recorded on individual records.

The frequency of the use of surveillance methods will be determined either on the basis of suitable general guidance or on the advice of a qualified practitioner.

4.32. Lead

Working with lead can put your health at risk, causing symptoms including headaches, stomach pains and anaemia. Other serious health effects include kidney damage, nerve and brain damage and infertility. Soha are committed to providing a safe and healthy working environment for all employees and those affected by our activities. Arrangements Procedures associated with this policy sets out how the organisation will comply with the Control of Lead at Work Regulations (CLAW) and how they will carry out of their operations so as to ensure, so far as is reasonably practicable, that the health and safety of any employee will not be adversely affected.

4.33. Legionella

Soha will comply with the Approved Code of Practice L8, Health and Safety at Work Act 1974, Control of Substances Hazardous to Health and the Management of Health and Safety at Work Regulations. We will take all reasonable and practical measures to prevent the exposure of employees, tenants and members of the public to legionella bacteria when visiting, living and/or working within any properties owned or rented by Soha; Keep a log of all locations of communal stored water systems and the associated risk assessments;

Provide information, training (where appropriate), instruction and where necessary supervision as identified by risk assessment; Ensure contractors follow defined, detailed procedures where work is carried out on our water systems.

4.34. Leptospirosis (Weil's Disease)

The Leptospira bacterium is predominantly spread by the urine of animals such as cattle, and more specific to work undertaken by Soha, rats. Infection is only from direct contact with the urine or where urine has transferred into water. The bacteria enter the body via cuts to the skin or through the nose/mouth. The organism is not airborne unless the water is being sprayed. Staff must report to their supervisor any signs of rats being present whether that is from finding excrement or seeing rats in the area. The risks must be assessed and precautions put in place to prevent infection before work continues.

4.35. Lifting

Lifts Passenger lifts, stair lifts and through floor lifts Soha will: Manage our portfolio of passenger lifts, stair lifts and through floor lifts to ensure their safe operation, as required by the Lifting Operations & Lifting Equipment Regulations (LOLER) and minimise risk to users; Ensure that all passenger lifts are regularly inspected as per statutory requirements. This will be achieved by complying with all relevant legislation guidance and aligning to industry best practice; Provide all relevant information, training (where appropriate), instruction and where necessary supervise staff, contractors and/or the public.

Any lifting equipment and lifting gear must be accompanied by a thorough examination certificate before being allowed to be used. Soha Response, will operate a LOLER register to that all lifting equipment can be logged maintained and monitored.

4.36. Lone working

A lone worker is someone who has no visual or audible communication with another person who is capable of providing assistance without delay, should illness, injury occur, or they are in danger(violence or assault). In practice, lone working can occur at any time, for example, at the start and end of the working day, during holiday periods, at weekends, whilst working away from Royal Scot House. In many cases, the risks are low, and work takes place without incident. A SoloProtect lone worker device is provided for employees who regularly work alone and/or drive on business alone. Soha will carry out risk assessments for employees working alone to determine if an unaccompanied person can do the work safely. The process supporting the above can be accessed on SharePoint.

4.37. Manual Handling

Manual handling, that involves a risk of injury, will be avoided as far as is reasonably practicable. Where this is not possible, risk assessments will be carried out to identify the levels of risk involved and the precautions needed to manage them effectively. Risk assessments will be reviewed whenever there is reason to believe that they may no longer be valid. Appropriate training and information will be provided to anyone who is required to undertake manual handling operations. Managers are responsible for monitoring the effectiveness of training, risk assessments and safe working methods. The process supporting the above can be accessed on SharePoint.

4.38. New and Expectant Mothers

New and expectant mothers may require additional protection in the workplace. When the expectant mother makes the HR team aware of their pregnancy, a risk assessment must be carried out, to determine whether certain aspects of their job are detrimental to the H&S of themselves, their unborn child or their new born child. Risk and workstation assessments, maybe required at different times during their pregnancy/return to work. The process supporting the above can be accessed on SharePoint.

4.39. Occupational Health

Soha provide an Employee Assistance Programme for all employees. This is a confidential, outsourced service designed to assist employees with health and welfare advice and counselling (also see Workplace Welfare and Wellbeing (physical and mental health) There are circumstances where Soha may require independent medical advice on a condition which affects a member of staffs' ability to carry out their role to the required standards. In this event, following guidance from HR, the staff member may be required to attend an occupational health appointment arranged by Soha. Further information can be provided by HR.

4.40. Personal Protective Equipment (PPE) including Respiratory Protective Equipment (RPE)

The range of activities carried out by Soha employees may include tasks where the use of PPE and RPE is required. PPE does not include protective face covering, or gloves provided to employees to control the transmission of COVID-19 virus. PPE includes face masks, gloves, boots etc and includes overalls to provide protection against dust/dirt and known infestations in void properties or lofts etc The details of PPE required will be recorded in relevant risk assessments. All members of staff who are issued with PPE will receive appropriate training and information on its safe use, storage and maintenance. The process supporting the above can be accessed on SharePoint.

4.41. Protection of the Public

All necessary measures required for the protection of the public will be allowed for and planned, taking into account Section 3 of the Health and Safety at Work Act 1974.

All working areas should be protected with suitable barriers, fencing or screens to reduce the risk of injury and prevent unauthorised access into the working area by the general public or unaccompanied visitors. Adequate signage will be put in place to also prevent any unauthorised access and warn the public of the hazards that are present on site.

Where work involves working in occupied premises, communication with the occupants will be continual throughout the work.

Issues to note in respect of the public or adjacent land occupants are:

- Noise
- Vibration
- Dust
- Exposure to other hazardous substances
- Fire and Explosion
- General inconvenience and danger caused by delivery vehicles, machinery and cranes.

4.42. Risk Assessment

Soha recognises that some activities, if not adequately controlled, may expose employees, residents, contractors or others to harm. Soha will therefore ensure that suitable and sufficient risk assessments are carried out where required by law or where work activities present a foreseeable risk.

Risk assessments will be undertaken in accordance with the **Management of Health and Safety at Work Regulations 1999** and relevant HSE guidance. They will identify hazards, persons at risk, existing controls, any additional control measures required, and the arrangements for review.

Risk assessments will be:

- suitable and proportionate to the level of risk
- completed by competent persons
- communicated to those affected
- reviewed periodically and whenever there is reason to believe they are no longer valid, including following incidents, near misses, operational change or changes in legislation or guidance

Employees who identify hazards during their work must report them through Mitti and notify their manager where immediate action is required.

Supporting procedures and templates are available on the Soha Hub / SharePoint.

4.43. Safety Inspections and Audits

Soha will carry out planned and reactive inspections, audits and workplace monitoring activities to assess compliance with this policy, supporting procedures and legal requirements.

Inspections and audits may include:

- workplace inspections
- operational safety inspections
- contractor monitoring
- property and communal area inspections
- thematic audits
- external independent reviews

Inspection and audit findings will be recorded through **Mitti** or other approved systems as appropriate, and remedial actions will be assigned and tracked to completion.

The results of inspections and audits will be reviewed by relevant managers, the Safety Champions Working Group Health and senior leaders as appropriate to ensure that recurring issues, trends and areas of non-compliance are identified and addressed.

Soha may also commission periodic independent review of its health and safety management system against legal requirements, recognised standards and good practice.

4.44. Safety signs

Appropriate safety signage will be displayed in all Soha offices, schemes and sites to ensure compliance with The Health and Safety (Safety Signs and Signals) Regulations. The Director of Property Services will arrange for the appropriate signage to be installed and displayed where identified as required by Fire Risk Assessment (FRA), general or specific risk assessments or other requirements. During health & safety inspections the display of compliant safety signage will be regularly checked.

4.45. Security

The security of our people whilst at work is of major importance to us. However, it is also very important to ensure that our offices are fully accessible to clients and visitors. As a consequence, we remain vulnerable to unauthorised persons entering our premises either by using a ‘lost' employee key fob or by ‘tailgating' behind an employee through a security door. We are all responsible for ensuring that our office remains a secure place to work.

We can help in this by:

- being wary of anyone unfamiliar attempting to follow you through a security door, especially if they are not displaying an ID badge
- being fully co-operative and pleased to show your ID badge if challenged
- displaying your ID badge at all times when in the office
- taking good care of your access fob and reporting its loss immediately to IT

4.46. Sharps/Needles

Soha acknowledge that some activities can expose employees to the hazard of used needles and ‘sharps’ that could present risks to their health and wellbeing. All employees working on tasks and activities with this hazard potentially present will receive information, guidance and equipment to be able to deal with the discovery of such items.

4.47. Stress

Soha are committed to protecting the health, safety and welfare of our employees. Irrespective of cause, employees are encouraged to discuss concerns regarding stress and anxiety and any perceived contributory factors with their Manager or HR to enable appropriate support and advice to be provided. Also see the Occupational Health and Workplace Welfare and Wellbeing (physical and mental health) sections of this document. A full Stress at work risk assessment is available on the health and safety SharePoint site.

Staff are given access to free counselling services via their benefits package and are encouraged to use it as the need arises.

4.48. Sun/UV Light

Soha acknowledge that some activities can expose employees to the hazard of prolonged excessive exposure to sunlight that could present risks to their health and wellbeing. All employees working on tasks and activities with this hazard potentially present will receive information and guidance on how to protect themselves from too much sunlight.

4.49. Training and Information

Soha will provide the health and safety information, instruction, training and supervision necessary to enable employees to work safely and fulfil their responsibilities.

All new employees will receive a health and safety induction appropriate to their role and place of work. Additional role-specific and risk-based training will be provided in accordance with training needs analysis, legal requirements, risk assessments and the Soha training matrix.

Managers are responsible for ensuring that employees:

- complete required induction and refresher training
- attend role-specific and statutory training where identified
- are provided with suitable local instruction and supervision
- are competent for the tasks they are required to undertake

Training records will be maintained through approved systems, including **Atlas** and other corporate record systems where appropriate.

Contractors must demonstrate that their employees have received suitable health and safety training and are competent to undertake the work they are engaged to carry out.

4.50. Visitors

Soha will ensure that all reasonable measures are taken to safeguard visitors from risks to their health and safety and that they are made aware of those health & safety provisions which may affect them e.g. procedures to be followed in emergencies. The Soha host at Royal Scot House, independent living and extra care schemes must ensure that visitors are properly supervised in the event of an emergency.

4.51. Violence & Harassment at work

Soha recognises that violent and aggressive behaviour can be demonstrated in many ways and come from a variety of sources. Our policy is to implement safe and secure systems and procedures to ensure the health, safety and wellbeing of all employees while at work. The process supporting the above can be accessed on SharePoint.

4.52. Vulnerable Persons

Soha Housing recognises that some individuals may be more vulnerable to harm or may require additional support to access services safely. Vulnerability may arise from a range of circumstances including, but not limited to, age, disability, physical or mental ill health, learning disability, cognitive impairment, sensory impairment, language or communication needs, pregnancy, temporary illness, safeguarding concerns, or other personal circumstances.

The organisation is committed to adopting a person-centred approach to health and safety and will, where reasonably practicable, identify and take account of vulnerability when planning work activities, delivering services and managing statutory compliance. This includes making reasonable adjustments, adapting communication methods, providing flexible appointments where appropriate, and working with carers, advocates, support agencies or other professionals where necessary to ensure individuals can safely access our services.

Employees, managers and contractors are expected to remain alert to indicators of vulnerability during the course of their work and, where concerns are identified, ensure that these are appropriately recorded, communicated and escalated in accordance with Soha's safeguarding, health and safety and operational procedures.

Consideration of vulnerability shall be incorporated into relevant risk assessments, safe systems of work, resident engagement activities and statutory compliance programmes to ensure that health and safety risks are effectively managed while maintaining the dignity, independence and wellbeing of those affected.

As Soha's Building Safety Compliance Framework continues to develop, this approach will be supported by a dedicated Vulnerability Framework, providing a consistent methodology for identifying, assessing, recording and managing vulnerability across all statutory compliance and health and safety activities.

4.52.1 Resident Safety

Soha Housing recognises that the safety of residents is fundamental to its role as a Registered Provider of Social Housing. The organisation is committed to providing homes that are safe, well maintained and compliant with all applicable legislative and regulatory requirements. Resident safety is central to the planning, delivery and continuous improvement of all property-related services and health and safety activities.

To fulfil its responsibilities as a landlord, Soha will:

- maintain effective arrangements to achieve compliance with all relevant statutory building safety requirements, including fire safety, gas safety, electrical safety, asbestos management, water hygiene, lift safety, damp and mould, and other property compliance obligations
- undertake proactive inspections, surveys, testing, maintenance and planned investment programmes to identify and manage risks before harm occurs
- ensure that suitable and sufficient risk assessments are undertaken and reviewed where risks to residents have been identified
- encourage residents to report hazards, defects, safety concerns and changes in personal circumstances that may affect their safety, ensuring that concerns are responded to promptly and proportionately
- engage with residents by providing clear information about safety responsibilities, planned compliance activities and how to access support or report concerns
- investigate incidents, complaints and significant safety events to identify lessons learned and implement appropriate corrective and preventative actions
- monitor compliance performance, audit outcomes, resident feedback and emerging risks to support continual improvement of the organisation's health and safety and building safety arrangements.

Through these arrangements, Soha seeks to create safer homes, promote resident confidence and provide assurance that health, safety and statutory compliance risks are being effectively managed throughout its housing stock.

4.53. Welfare

All offices and facilities, will be maintained in accordance with Workplace (Health, Safety and Welfare) Regulation, and the Construction (Design & Management Regulations). These regulations apply to the main office and construction sites.

The following will be monitored in accordance with above regulations.

- Maintenance of workplace, and of equipment, devices and systems
- Temperature of indoor workplaces

- Room dimensions and space
- Work stations, area and seating
- Conditions of floors and traffic routes
- Ability to clean windows etc safely
- Welfare facilities, to include sanitary conveniences, washing facilities, drinking water, changing rooms and rest facilities

Wellbeing (physical and mental health) Soha aims to create and maintain a happy and healthy working environment, supporting all staff whether office based, working from home or remote working. To support this, we have an Employee Wellbeing Policy and procedures available on the SharePoint.

4.54. Work Environment

Soha will endeavour to maintain a comfortable working environment. Workplaces will be maintained in a clean condition and free from accumulated waste. Floors should be kept clear of obvious hazards that could result in slips, trips and falls, including loose carpet tiles and slippery surfaces. Regular, recorded inspections of the working environment are carried out by Health and Safety Reps with records retained. The process supporting the above can be accessed on SharePoint Work Equipment Legislation such as Provision and Use of Work Equipment Regulations (PUWER) and the Lifting Operations and Lifting Equipment Regulations (LOLER) sets out the standards and requirements required of Soha for the provision and maintenance of safe equipment in the work place. Soha aims to provide equipment that is, as far as is reasonably practicable, safe and without risk to health, in accordance the PUWER. Equipment will be provided that is appropriate for the work for which it is intended to be used and it must be checked before each use in accordance with the manufacturer's guidance. Information, instruction and training will be provided for all users of work equipment. Training will include the risks associated with use of the equipment, protective and preventative measures, correct use of guards, safe systems of work and any PPE that must be worn. Employees must not use any work equipment, unless they have received the necessary information, instruction and training, and are wearing the necessary personal protective equipment. Any damaged, unsafe or malfunctioning equipment must be reported to the line manager, and the equipment clearly marked as faulty and removed from service until satisfactorily repaired. The process supporting the above can be accessed on SharePoint.

4.55. Work Equipment

The Provision and Use of Work Equipment Regulations (PUWER) cover all kinds of work equipment, including hand tools. Soha will make sure that all equipment is suitable for its intended use, taking in to account the local environment, working conditions and hazards in the workplace. Soha will provide adequate information, instruction and training and will ensure that all equipment conforms with the EC product directive and be CE marked. Soha will operate a PUWER register so that all work equipment can be logged, maintained and monitored.

4.56. Working at height

Soha, will comply with its duties under the Work at Height Regulations. Work at height activities will be assessed and alternatives to work at height will always be considered. The use of ladders for any work at height will only be approved where other more suitable work equipment is not considered to be appropriate. Soha will following the hierarchy of

control measures listed in the regulations, and will be considered in the risk assessments and method statements.

It is Soha policy to ensure that all working at height equipment is:

- fit for purpose
- adequately maintained and inspected on a regular basis
- safely used by employees
- kept secure when not being used
- regularly inspected and tagged, or logged in a register, with date of inspection

If employees identify a need for working at height equipment. Supervisors must ensure suitable equipment is procured. Soha employees will receive instruction on the safe use of work at height equipment before use.

4.57. Young persons at work

A young person is anyone aged between 16 and 18 years of age. Young persons could be and employee or on work experience placements or could visit the premises as a student or group of students. HR will ensure a risk assessment is agreed with the young person and the Manager of the work area hosting them. The process supporting the above can be accessed on SharePoint.

4.58. Performance Monitoring

Health & Safety performance shall be monitored through:

- accident statistics
- RIDDOR
- audits
- inspections
- contractor performance
- statutory compliance
- training
- corrective actions
- resident safety performance

and reported through:

- Safety Champions
- SLT
- Board

Review, Approval and Version Control

This policy will be reviewed at least annually by the Head of Health and Safety, or sooner where there is:

- a significant change in legislation, guidance or regulatory expectation
- a material organisational or operational change

- learning arising from incidents, audits, inspections or enforcement action
- a need identified through monitoring or governance review

The policy will be subject to consultation and approval through Soha's governance arrangements prior to issue.

Members' Forum noted	16 July 2026	SLT approved	27 May 2026
EIA completed	29 May 2026	Board approved (via e-decision)	4 August 2026
DPIA Checklist completed	9 November 2026	Review due date	By August 2027

Version control

Date reviewed by H&S	Reason for review	Version no.	Changes made (if applicable)	Changes made by
20/03/2025	To incorporate Soha Response	3.0	Refresh to include Soha Response and expansion of responsibilities and arrangements	C Goakes - Interim Head of H&S
01/04/2026	Annual review	4.0	Updated in line with changes within the business	David Evans – Head of Health & Safety
28/07/2026	Comprehensive review to align with Safety and Quality Consumer Standard, ARK Landlord Compliance Audit recommendations and the Three Lines of Assurance model.	4.1	Amendments	David Evans – Head of Health & Safety