

Health and Safety Policy

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1. Introduction

1.1. This policy sets out the health and safety arrangements for the Clyde Valley Group (CVG) and applies to all employees (including temporary or agency staff), customers, members of the public, suppliers and contractors.

1.1.1. The policy is intended to outline CVG's commitment to planning and managing health and safety; to achieving acceptable standards; to reducing accidents; and to demonstrate to all employees that the group is fully committed to their health, safety and welfare. It should be noted that Health & Safety guidelines are available to all staff and give a comprehensive outline of Health and Safety guiding principles.

2. Safety Policy Statement

2.1 The Board of Management of The CVG is responsible for the conduct of the business of the Group. CVG's Health and Safety Structure is outlined at Appendix 1.

2.1.1 The Health and Safety at Work etc. Act 1974 imposes statutory duties on employers and employees. To enable these statutory duties to be carried out, it is the policy of CVG, as far as is reasonably practicable, to ensure that responsibilities for safety and health are assigned, accepted and fulfilled at all levels; that all practicable steps are taken to manage the health, safety and welfare of all employees and to conduct the business in such a way that the health and safety of visitors, to any premises under our control, is not put at risk.

2.1.2 It is the intention of The CVG, as far as is reasonably practicable, to ensure that: -

- The working environment of all employees is safe and without risks to health and that adequate provision is made with regard to the facilities and arrangements for their welfare at work.
- The provision and maintenance of machines, equipment and systems of work which are safe and without risks to health to employees, contractors and any other person who may be affected with regard to any premises or operations under our control.
- The project management of development sites ensures full compliance with all health and safety legislation and good practice is ensured.
- The project management of our planned programme works ensures full compliance with all health and safety legislation and good practice is ensured.
- Arrangements for use, handling, storage and transport of articles and substances for use at work are safe and without risks to health.
- Adequate information is available with respect to machines and substances used at work detailing the conditions and precautions necessary to ensure that when properly used they will be safe and without risk to health.
- Employees are provided with such instruction, training and supervision as is necessary to secure their health and safety.

- This Health and Safety Policy will be reviewed every 3 years unless legislation dictates otherwise. Communication of any such changes will be made to all employees.

2.1.3 It shall be the duty of all employees at work to ensure:

- Those reasonable steps are taken to safeguard the health and safety of themselves and of other persons who may be affected by their acts or omissions at work.
- Co-operation with the Board so far as is necessary to ensure compliance with any duty or requirement imposed on the employer, or any other person, under any relevant statutory duties.

3. Informing and Involving Stakeholders

3.1. CVG will ensure that all staff are fully informed of the full Policy and that they all confirm that they have read and understood it. Training will be given to all staff and Board members in order to understand and meet their responsibilities in relation to Health & Safety. More specific health and safety training will be provided to Board and Staff members in relation to individual responsibilities.

4. Responsibilities

4.1. CVG and all of its employees have a responsibility for the successful application of the health and safety policy. The health and safety ethos and culture comes from the actions, attitude and commitment at every level. Key areas of responsibility for individuals or groups of individuals in relation to health and safety are described as follows:

5. CVHA Board

5.1. It is recognised that the Board, whilst not actively involved in the daily running of the organisation, have certain responsibilities in terms of Health & Safety and the following procedures will be adopted to ensure responsibilities are effectively managed.

5.1.1. The Board will endorse the Health & Safety Policy and Control Manual and annually the Chairperson and Chief Executive will sign the Health & Safety Policy Statement. Where there is a change of personnel, the incoming Chairperson will sign the policy to ensure the commitment on behalf of the Board remains current.

5.1.2. The Board will consider 'Health & Safety' key performance indicators as a standing item on the Board Meeting. This will allow executives to report on safety performance, requirements, safety failures and other Health & Safety related issues. The Board will give all such issues due consideration and will make available all reasonable funding and support as may be required.

5.1.3. All Board members will undergo training in 'Health & Safety Awareness'. This will ensure that all members have a working knowledge of the topic, which will assist in the discussion of Health & Safety at all meetings. This should also assist the Board in determining whether the Chief Executive is managing Health & Safety adequately within the organisation.

5.1.4. The Board will ensure that it is represented by a member at the Health and Safety Operational Group.

6. The Chief Executive

- 6.1. The Chief Executive is responsible for the general day to day running of CVG. It is recognised that this function incurs the overall responsibility for Health & Safety management within the organisation and the following procedures will be adopted to ensure adequate provisions are made and maintained.
 - 6.1.1. The Chief Executive will endorse the Health & Safety Policy and Control Manual and will annually sign the Health & Safety Policy Statement along with the Chairperson of CVHA. Where there is a change of personnel, the incoming Chief Executive will sign the policy to demonstrate commitment and acceptance of responsibilities.
 - 6.1.2. The Chief Executive will hold ultimate responsibility for the organisation's policy, procedures and arrangements and for the implementation of such. To this end, and to comply with the duties set out in the *Management of Health and Safety at Work Regulations 1999, as amended*, he will appoint an adequate number of competent persons to achieve and maintain legal compliance. This will include a Health & Safety Administrator and any external specialist Consultants. The Chief Executive will also take all appropriate action to reduce the risks to Health & Safety arising from the business undertaking and to improve the organisation's safety performance.
 - 6.1.3. The Chief Executive will report on safety performance, safety failures and other Health & Safety related issues at each Board meeting.
 - 6.1.4. The Chief Executive will conduct investigations on any health and safety failings and review the findings of these. The Chief Executive will authorise the use of all reasonable support required to rectify any significant non-compliances identified by the audit. The Chief Executive will make available all reasonable resources for a full investigation and for the taking of adequate measures to rectify any deficiencies in the existing arrangements.
 - 6.1.5. The Chief Executive will ensure that Health & Safety considerations are taken into account for all new investment opportunities and in the organisation's Procurement Strategy. The objective will be to minimise risks as early in the supply chain as is reasonably practicable.
 - 6.1.6. The Chief Executive will be responsible for maintaining an adequate programme of Risk Assessment, allocating duties and funds as appropriate to keep assessments and control measures current.
 - 6.1.7. The Chief Executive will be responsible for maintaining an adequate programme of staff training in Health & Safety issues, ensuring that all staff are given appropriate instruction, information and training to reduce the risks associated with their work to an acceptable level.
 - 6.1.8. The Chief Executive will ensure that adequate communication channels exist throughout the entire organisation to allow Health & Safety issues to be dealt with timeously and effectively. All staff will be given the opportunity to raise any safety related queries with appropriate management staff.
 - 6.1.9. The Chief Executive will ensure that all significant safety failures are fully investigated and reported to the Board. He/She will also ensure that all necessary support is sought to adequately investigate the situation and develop suitable remedial measures to reduce the likelihood of a similar incident recurring.

6.1.10. The Chief Executive will give due consideration to all Health & Safety related requests from all other staff, taking appropriate action where necessary.

7. Health & Safety Operational Group

7.1 The Health & Safety Operational Group is responsible for oversight of all Health & Safety matters across Clyde Valley Group (CVG) reporting to the Executive Management Team that the rigour in terms of H&S requirement are being met across all areas of the business on reporting to Audit Committee in respect of all Tenant Health & Safety.

7.2 The Health & Safety Operational Group will provide an open forum for the discussion of all Health & Safety related issues. Key group personnel including the Director of Property & Development, the Health & Safety Administrator, will attend the Health & Safety Operational Group, along with other suitably identified staff members with a key responsibility for Health & Safety. These will include the Asset Manager, Repairs Manager, Project Asset Manager, Development Manager, Customer Services Manager, Lettings Manager, Senior People Partner and representative First Aiders and Fire Wardens.

7.3 The Health & Safety Operational Group will meet bi-monthly; The Director of Property & Development will chair meeting and in their absence the Asset Manager. Minutes will be taken at each meeting, complete within one week and an action log will be used to track all actions from the meetings and status of these actions.

7.4 The Health & Safety Operational Group members will undergo suitable training, which will include as a minimum 'Health & Safety Awareness'. This will ensure that all members have a working knowledge of the topic, commensurate with their role on the Group and within the organisation as a whole.

7.5 The Health & Safety Operational Group will suggest solutions and initiatives for issues arising, which will be minuted and presented to the Executive Management Team, following each meeting, without undue delay.

7.6 Where appropriate, the Health & Safety Operational Group will draft and revise policy, procedures and arrangements, for ultimate approval by CVHA Board, Chief Executive and Executive Team in line with the Scheme of Delegation.

7.7 The Health & Safety Operational Group will delegate, with the Chief Executive's approval, to members and to other appropriate persons within the organisation, actions required to be taken to implement policies, procedures, arrangements and any other initiatives authorised by the Chief Executive and the CVHA Board.

7.8 The Health & Safety Operational Group will:

- All - Review the Health & Safety performance of the organisation including tenant health and safety matters, office and staff.
- All - Oversight of all tenant Health & Safety matters, ensure compliance with legislation and take a proactive approach understand changes in legislation and take action to comply.
- All - Oversight of health and safety KPI's and to recommend and take action where applicable.

- HR - Oversight of staff health and safety including lone working, use of safeguards, wellbeing surveys and ensure H&S awareness training is delivered to all staff as appropriate.
- Admin - Ensure compliance for office in terms of H&S equipment, first aid and fire wardens.
- Admin - Oversight of DSE for all staff and ensure compliance for all staff.
- TBC - Analyse accident statistics, near misses, reported breaches of policy and procedures.
- Ensure all actions arising from Audits, Risk Assessments and all other avenues in respect of Health & Safety are actioned timeously and the full action tracker reported to Executive Management Team quarterly.
- Analyse audit and inspection reports and data from other information gathering exercises in respect of Health & Safety.
- Report to Audit Committee on all tenant health and safety matters.
- Make recommendations on options to improve safety performance to Executive Team.
- Develop and oversee the Operational Health & Safety Risk Register and escalate any operational risks to strategic risk as applicable.
- Oversight of CDM matters and compliance on Development and Asset related projects.
- Oversight of Insurance claims with key focus on reviewing any property/liability claims, learning lessons from these and communicating these lessons and change as a result of.
- Oversight of staff wellbeing aligned to the Healthy Working Lives Accreditation.
- Ensure communication with all staff in respect of Health and Safety matters is in place and appropriate.

7.9 All Health & Safety Operational Group Minutes are presented to the Audit Committee and a Health & Safety report will be presented to the CVHA Board on an annual basis.

8. Health and Safety Administrator

8.1 The function of the Health and Safety Administrator is, by definition, one of 'administration' as opposed to 'management'. The Health and Safety Administrator will be fully supported by the Chief Executive and Executive Team.

8.1.1 The Health and Safety Administrator will undergo suitable training, which will include as a minimum 'Health & Safety Awareness' and instruction in the implementation of the policies, procedures and arrangements set out in the Control Manual.

8.1.2 The Health and Safety Administrator will maintain the policy and the record keeping system in an up to date and tidy condition. This will include the dissemination of all Manual updates to Manual holders and the filing of appropriate records.

8.1.3 The Health and Safety Administrator will comply with their duties as set out in the Control Manual and will report the findings of any inspections, audits and other information gathering exercises to the Health and Safety Operational Group without undue delay. Where the Health and Safety Administrator has reason to believe that personnel are, or may foreseeably become, exposed to significant risk, direction will be sought from the Finance & Corporate Services Director without undue delay.

8.1.4 The Health and Safety Administrator will provide assistance to the Chief Executive, Health and Safety Operational Group and Executive Team (ET) in the undertaking of risk assessments, control implementation, policy development, etc. This may involve

liaison with external specialist consultants.

9. Executive Team (ET) and Leadership Team (LT)

- 9.1. Due to the 'managerial' function performed by the ET and LT it is recognised that ET and LT Members may be held liable where Health & Safety offences are committed with their consent or involvement or as a result of their negligence.
 - 9.1.1. ET/LT will take an active participation in the Health and Safety Operational Group. This will involve the identification of Health & Safety concerns within their departments; the raising of pertinent issues for consideration by the Health and Safety Operational Group and the auctioning of all measures identified by the Health and Safety Operational Group and management staff as being required.
 - 9.1.2. ET/LT will implement all relevant policies, procedures and arrangements within their departments.
 - 9.1.3. ET/LT will ensure that adequate communication channels exist throughout their departments to allow health and safety issues to be dealt with timeously and effectively. All departmental staff will be given the opportunity to raise any safety related queries with their LT/MT member.
 - 9.1.4. ET/LT will ensure that all departmental staff adopt safe working procedures, work in accordance with any training provided and properly use any control measures, protective equipment etc. that are appropriate for the work carried out.
 - 9.1.5. Where ET/LT identify the need for further training or any other form of risk control for departmental staff, the issue will be reported without undue delay to the Finance & Corporate Services Director or Chief Executive.
 - 9.1.6. Where ET/LT identify any significant breach of Health & Safety procedures, appropriate action will be taken to reduce the risk in the short term, and the issue should be reported to the Finance & Corporate Services Director without undue delay.

10. Development Sites Health and Safety Responsibilities

- 10.1. The Development and Property Director is responsible for leading all aspects of health and safety in relation to development sites and project management in this area. There may also be instances where the Group acquires distressed sites and has to act as Contract Manager until such time as a contractor is appointed – this requires the Group to ensure full health and safety liabilities.
 - 10.1.1. The Property and Development Director ensures the appointment of a suitable CDM Co-ordinator, where relevant and also ensures that the health and safety checklist is implemented for each site and risk assessments undertaken. All procedures in relation to these specific duties are contained within the Investment Procedure Manual.
 - 10.1.2. The Property and Development Director is responsible for ensuring ongoing review and compliance of site health and safety. The Finance & Corporate Services Director is responsible for undertaking ad-hoc sites audits to ensure this and also to seek best practice advice.

11. Planned Programme Works Health and Safety Responsibilities

- 11.1. The Property and Development Director is responsible for leading all aspects of health and safety in relation to planned programme works and project management in this area.
 - 11.1.1. The Property and Development Director ensures the appointment of a suitable CDM Co-ordinator, where relevant and also ensures that all health and safety documentation is in place and suitably assessed and reviewed.
 - 11.1.2. The Property and Development Director is responsible for ensuring ongoing review and compliance of planned programme works health and safety. The Finance & Corporate Services Director is responsible for undertaking ad-hoc audits to ensure this and also to seek best practice advice.

12. Reactive Repairs and Cyclical Works Health and Safety Responsibilities

- 12.1. The Property and Development Director is responsible for leading all aspects of health and safety in relation to reactive and cyclical repairs works and project management in this area.
 - 12.1.1. The Property and Development Director ensures that all health and safety documentation is in place and suitably assessed and reviewed.
 - 12.1.2. The Property and Development Director is responsible for ensuring ongoing review and compliance of reactive and cyclical repairs works health and safety. The Customer Services Director is responsible for undertaking ad-hoc audits to ensure this and also to seek best practice advice.

13. Employees

- 13.1. While the duties of leadership teams have been made clear in previous sections, it is recognised that ALL employees have general duties to ensure their own safety and that of others. Indeed, the Health and Safety at Work etc. Act 1974 notes the following in respect of employees' duties:
 - “It shall be the duty of every employee while at work –
 - (a) to take reasonable care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work; and
 - (b) as regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with.”
 - 13.1.1. The following procedures will, therefore, be adopted by all employees to ensure their duties are adequately discharged.
 - 13.1.2. Employees will comply with the policies, procedures and arrangements set out in the Policy and Control Manual and with any information, instruction and training provided. In addition, any risk control measures and equipment provided to ensure safe working practices will be properly used.

- 13.1.3. Employees will report to their Senior Managers/ Line Managers or other member of management any identified breaches of Health & Safety procedures, any accidents, near misses or safety related incidents and any aspect, which appears to them to give rise to a significant risk to the Health & Safety of employees or other persons. Such reports will be made without undue delay.
- 13.1.4. Employees will inform their Line Manager or other member of management, without undue delay, where they believe that further training or other risk control measures would be beneficial. Tasks should not be carried out where the employee believes significant risk to be present.
- 13.1.5. Employees will co-operate in all safety programmes, training, risk assessments and other initiatives that are intended to reduce risk and will actively implement any control measures identified as being required.
- 13.1.6. Employees will not participate in horseplay, practical jokes or other acts, which may result in harm being caused to themselves or to other individuals.

14. EVH Health and Safety Support Services

- 14.1. CVG maintains a contract with an external Health & Safety consultancy firm, who provides professional and technical support to The CVG. This service complements the available internal resources, thus assisting the organisation to discharge its duty as set out in the *Management of Health and Safety at Work Regulations 1999, as amended* to appoint an adequate number of competent persons to achieve and maintain legal compliance. The health and safety service includes the provision of:
- External auditing of the Health & Safety system
 - Control Manual updating service
 - Helpline for all Health & Safety related queries
 - Specialist consultancy and training support as required

15. Training

- 15.1. CVG is committed to ensuring that all staff understand the principles of health and safety and the practical effects of its requirements. It will therefore provide every member of staff with basic training on health & safety and will ensure that all new members of staff receive this training and also a general overview as part of their induction process.
- 15.1.1. Line Managers will monitor the effectiveness of the training. Should individual training requirements be identified these will be discussed between the Line Manager and the individual member of staff and appropriate arrangements put in place in consultation with the Customer Services Director, if required.

16. First Aid

- 16.1. CVG will ensure that it has 3 members of staff trained as a 'First Aiders at Work'. These employees will have successfully undergone a HSE certified 'First-aid at Work' course, with refresher training scheduled every 3 years. The first aiders will be predominantly office based, and be available to administer first aid should they be so required. The Groups First Aiders are outlined at Appendix 2.

- 16.1.1. All accidents, incidents and “near misses” arising in the office, or in connection with any work carried out by CVG staff, should be reported to one of the First aiders as soon as possible, who will deal with the situation as appropriate. Any incidents, including near misses should be logged in the Accident Book which is retained by the Health and Safety Administrator.
- 16.1.2. Following the incident, the Health and Safety Administrator will carry out a full investigation which will address the immediate causes, any contributory causes, faulty equipment or control measures, site rules broken by the casualty or any other member of staff, necessary corrective action and required reviews of the Policies and Procedures.
- 16.1.3. The Health and Safety Administrator will provide a report of accidents and incidents at each Health and Safety Operational Group Meeting.
- 16.1.4. Under certain circumstances, injuries, diseases and dangerous occurrences must be officially reported to the enforcing authority. The “RIDDOR” regulations set out specific definitions of such incidents and the required reporting mechanism.

17. Fire Wardens

- 17.1. CVG will attempt to minimise the likelihood and consequences of fire and/or explosion not caused by the deliberate acts of individuals and/or groups and ensure that proper fire evacuation procedures are in place and notified to all staff and visitors.
 - 17.1.1. These procedures will detail nominated fire wardens, and respective deputies who will be fully trained to carry out their responsibilities in this area. Fire Wardens will attend the Health and Safety Operational Group Meetings to report on any incidents, as well as acting as their Departmental representative in relation to health and safety. A list of Fire Wardens is outlined at Appendix 3.

18. Personal Protective Equipment

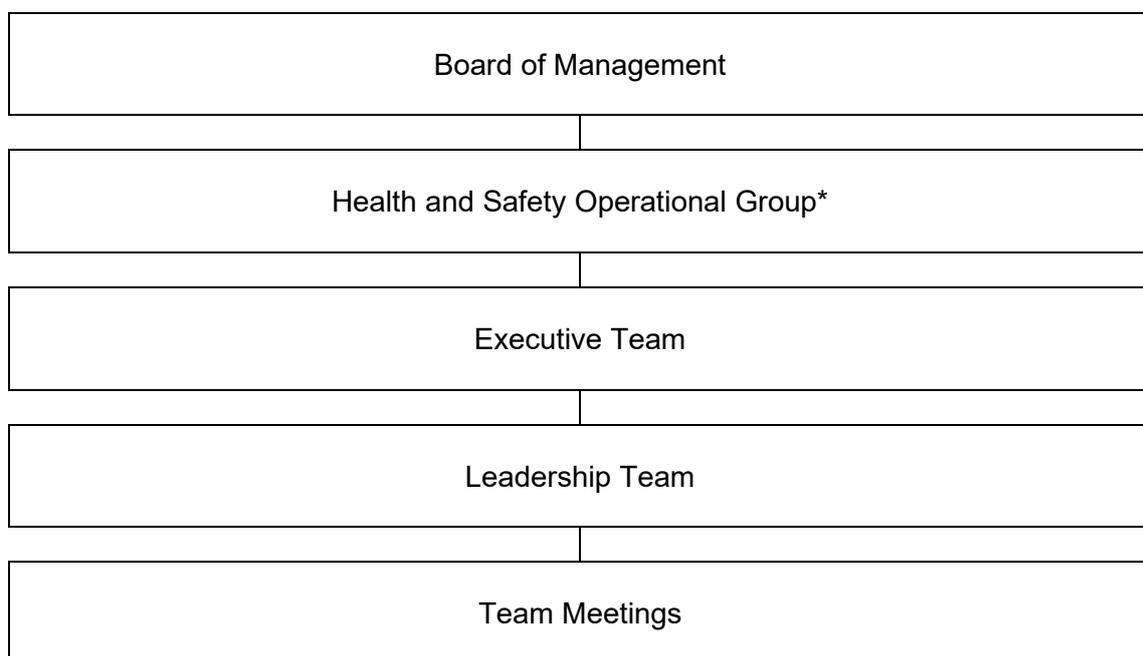
- 18.1. Personal Protective Equipment (PPE) includes a range of clothing and protective devices to protect the wearer from certain hazards. PPE includes such items as hard hats, respirators, safety boots, protective gloves and high visibility vests.
 - 18.1.1. All PPE will be fit for purpose, serviced, and maintained, correctly stored and compatible with other PPE which is required to be worn. To ensure that PPE is hygienic and otherwise free of risk to health, the individual to whom it is issued will only use all such equipment. Staff who are required to use PPE will be trained in its correct use and in the appropriate procedures for reporting defects. Should staff note any defects they must be reported to the Health and Safety Administrator immediately.
 - 18.1.2. All PPE should be formally checked annually and the Corporate Services team will prompt you into completing a checklist. A register of all PPE, together with details of servicing, issue to personnel, repairs etc. will be kept on file by the Health and Safety Administrator.
 - 18.1.3. Face coverings and hand sanitisers will be made available for all staff and can be obtained in the Customer Contact Centre.

19. Periodic Checks and Testing Programme

- 19.1. The Health and Safety Administrator will arrange for a range of periodic checks and tests, which includes both system and equipment checks/testing. The Periodic Checks and Testing Programme is outlined at Appendix 4.



**Clyde Valley Group
Health and Safety Structure**



*** Membership of Health and Safety Operational Group**

- Property and Development Director
- Development Manager
- Development & Asset Project Manager
- Asset Manager
- Repairs Manager
- Customer Services Manager
- Lettings Manager
- Health and Safety Administrator
- Representative Fire Wardens/ First Aiders



**Clyde Valley Group
List of First Aiders**

Name	Department	Location
Sandra Gardner	Customer Services	Ground Floor
Arlene Duncan	Customer Services	Ground Floor
Lisa Hughes	Corporate Services	First Floor
Lindsay Neary	Corporate Services	First Floor
Jo-anne Roberts	Finance	First Floor
Natalie Kean	Repairs	Second Floor
Robert Pollock	Asset Management	Second Floor

Appendix Three – Fire Wardens



**Clyde Valley Group
Fire Wardens**

Lisa Hughes	Anne Cavinue	Lindsay Neary
Carole Kirkman	Matthew Welsh	Jo-anne Roberts
Graham Harper	Lynn Wassell	Holly Baird
Charlene Hudson-Brown		



**Clyde Valley Group
Periodic Checks and Testing Programme**

System/Equipment	When
Fire Evacuation	Bi-Annually
Fire Risk Assessment	Annually
Fire Extinguishers/blankets	Annually
Fire Alarm (Formal)	Twice Annually
Fire Alarm (Informal)	Weekly
Emergency Lighting (Formal)	3 Yearly
Emergency Lighting (informal)	Monthly
Portable Appliance Testing	Bi-Annually
Fixed Electrical Installations (routine)	Annually
Fixed Electrical Installations, Inspection & test	5 years
Housekeeping & Safety Inspection	Quarterly
Ladder Inspections	Monthly
Personal Protective Equipment	Quarterly
Personal Protective Clothing	Quarterly
Intruder Alarm	Bi-Annually
CCTV	Bi-Annually
Tools (informal)	Before use

Policy Change History

Version No:	Substantive Change	Author of Change	Approval	Date	Website
1.0	New front cover & version history applied	Anne Cavinue		17/03/23	Y