



The Health and Safety Policy details the health and safety arrangements in place across Longhurst Group.

# Health and Safety Policy

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**Part 1**

# About this policy

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## Document management

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<b>Directorate</b>	People and Performance
<b>Policy sponsor</b>	Executive Director of People and Performance
<b>Policy owner</b>	Director of Governance and Compliance
<b>Policy author</b>	Head of Health and Safety
<b>Summary</b>	The Health and Safety Policy details the health and safety arrangements in place across Longhurst Group.
<b>Target audience</b>	All colleagues

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## Review process

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<b>Approval route</b>	Directors Team – Executive Leadership Team – Group Board
<b>Approved by</b>	Group Board
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## Part 2

# Overview

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### Intent

The Policy details the health and safety arrangements in place to effectively manage health and safety across Longhurst Group as required by the Health and Safety at work etc Act 1974, and related regulations, these arrangements ensure compliance with H&S legislation and underpin the 'general policy' provided in the Health and Safety Statement.

The Policy is based on the health and safety management system principles presented in the HSE guidance: *HSG65 Managing for health and safety* to strive for continuous improvement in our approach to occupational health and safety management.

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### Policy statement

This policy supports the Group's values and is a commitment to improving lives and supporting colleagues by providing a safe place to work and ensuring health and safety arrangements are in place.

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### Scope

The terms 'Longhurst Group' and 'the Group' incorporate all member companies and subsidiaries.

This policy applies to all parts of the Group. This Policy details the Group's arrangements to manage health and safety at work, this policy does not detail the arrangements associated with property health and safety compliance covered under separate policies respectively.

The policy does not form part of any colleague's contract of employment and the policy may be amended at any time.

## Part 3

# Policy details

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## Health and Safety Statement

The Group will prepare a written Health and Safety Statement of our 'general policy' with respect to the health and safety at work of our employees. The Health and Safety Statement will be reviewed and approved by the Group Board, signed by the Group Board Chair and Chief Executive Officer, and communicated to all Colleagues.

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## Health and Safety Arrangements

The Health and Safety Policy details the Group's *health and safety arrangements* for the effective management of health and safety – as required under The Management of Health and Safety at Work Regulations 1999.

The health and safety arrangements implemented by the Group are in line with the industry recognised approach to effective health and safety management as presented in HSG 65: managing for health and safety.

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## Consultation with Employees and Worker Involvement

The Group will consult with employees through the Health and Safety (H&S) Committee. The H&S Committee structure is determined in consultation with senior members of staff.

The H&S Committee will meet regularly as determined in the H&S Committee Terms of Reference. The H&S Committee will assist the Group in meeting its duties under the Health and Safety (Consultation with Employees) Regulations 1996.

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## Risk Profiling

The H&S team will maintain the H&S Risk Register for significant health and safety risks that are the responsibility of the H&S team across the Group.

Risk profiling will inform the development and review of risk assessments used across the Group.

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## Risk Assessment

The following specific risk assessments will be carried out, as per the requirements of the respective regulations, across the Group (where applicable):

- Display Screen Equipment assessments (DSE)
- Control of Substances Hazardous to Health (COSHH) assessments
- Staff Risk Assessments
  - Role specific
  - Expectant mother
  - Young worker
- Property risk assessments including:
  - Fire Risk Assessments – See Fire Safety Policy
  - Legionella Risk Assessments – See Legionella Policy

- Premise Risk Assessments

All colleagues will have a risk assessment undertaken by their line manager to capture hazards associated with their role. In addition, any specific considerations will be included such as any risks associated with being a new/expectant mother or a young worker (as defined within the respective regulations).

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## Risk Controls

Risk controls will be identified through the risk assessment process. Arrangements for specific hazards are detailed below.

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## Arrangements for Specific Hazards

### Display Screen Equipment (DSE)

Where a risk assessment has identified a colleague as a user of display screen equipment then the colleague will undertake a suitable and sufficient analysis of their workstation and work environment by completing an annual Display Screen Equipment risk assessment as required by The Health and Safety (Display Screen Equipment) Regulations 1992 (as amended in 2002). The DSE assessment may also need to be completed before the annual requirement if the colleague's workstation changes.

The DSE assessment findings will be reviewed by the H&S team, any recommendations will be emailed to the colleague to discuss with their line manager where applicable.

### Control of Substances Hazardous to Health (COSHH)

Where a colleague's risk assessment has identified that they are working with substances hazardous to health then the requirements of The Control of Substances Hazardous to Health Regulations 2002 (COSHH) will apply. COSHH assessments in accordance with Reg 6 (2) will be produced for any hazardous substances being used. Employees will receive suitable and sufficient information, instruction and training as required by Reg 12 including details of the substances hazardous to health to which the employee is liable to be exposed, including the significant findings of the COSHH Risk Assessments, the appropriate precautions, and actions to be taken by the employee to safeguard themselves and those around them. The information, instruction and training required shall be adapted to take account of significant changes in the type of work carried out or methods of work used by the employer; and provided in a manner appropriate to the level, type and duration of exposure identified by the risk assessment.

The Group will ensure that any person carrying out work in connection with the employer's duties under these Regulations has suitable and sufficient information, instruction and training as required under the regulations.

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## Work Equipment

The Group will comply with The Provision and Use of Work Equipment Regulations 1998 (PUWER).

*"Work equipment" means any machinery, appliance, apparatus, tool, or installation for use at work (whether exclusively or not):*

The provision and use of work equipment will be assessed as part of the colleague's risk assessment. Dependent on the equipment, where required, information and instructions will

be provided. All persons who use work equipment will have received adequate training for the purposes of ensuring their health and safety, including training in the methods which may be adopted when using the work equipment.

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### **Lifting operations and equipment**

*“Lifting equipment” means work equipment for lifting or lowering loads and includes its attachments used for anchoring, fixing, or supporting it.*

*“Lifting operation” means an operation concerned with the lifting or lowering of a load.*

The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) apply to lifting equipment that is defined as ‘work equipment’ under PUWER 1998. Therefore, the arrangements for ‘work equipment’ as detailed in the previous section will apply with the addition of specific requirements for lifting operations and equipment as required by LOLER 1998.

All lifting equipment will comply with the requirements for thorough examination and inspection of lifting equipment by a competent person, as defined in the regulations. Before lifting equipment is put into service for the first-time lifting equipment will have been thoroughly examined in accordance with Schedule 1 of LOLER 1998 – See Lift and Lifting Equipment Safety Policy.

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### **Training and Competence**

Adequate training, instruction and awareness will be provided to allow employees to undertake their work in a safe and healthy manner. Training required for the safe undertaking of work tasks will be identified as part of the risk assessment process in conjunction with line managers.

The H&S team will work closely with the People Services department to ensure all health and safety training is effectively managed by the Learning and Development team.

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

PPE will be provided to colleagues whose risk assessments have identified PPE as a control measure. Colleagues will be provided with information regarding how and when to use the PPE, the limitations as to its use and how to store it. Colleagues are responsible for visually inspecting any PPE prior to use and any obvious defects are to be reported to their line manager.

The Group will not charge employees for PPE.

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### **Contractor Health and Safety**

Longhurst Group will ensure that all contractors undertaking work on our behalf are competent to undertake the work safely without risk of harm to our colleagues, customers and the public. We will only use contractors where we have assessed their competency to undertake the specified work. The assessment will be done by making enquiries to determine whether they have the right combination of skills, experience, and knowledge for the job. A risk-based approach will be adopted with the degree of competence required depending on the work. Similarly, the level of enquiries made will be determined by the level of risk and the complexity of the job. Where applicable, Longhurst Group may use third parties (such as consultants) to assist in assessing the competency of our contractors and other 3<sup>rd</sup> parties.



For construction work The Construction (Design and Management) Regulations 2015 will apply and will be adhered to.

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## Active Monitoring

### General health and safety

As part of the H&S function, active monitoring will be undertaken across the different departments to provide assurance on how health and safety is being managed, the effectiveness of our processes and, where required, identify areas for improvement.

### Property Compliance – 2<sup>nd</sup> line assurance

The H&S team will undertake a 2<sup>nd</sup> line assurance role to provide assurance across the Asset Compliance areas. This will provide internal assurance of specific property, gas and electrical compliance elements as defined in the respective assurance procedures.

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## Reactive Monitoring

### Accident, incident and near miss reporting

All accidents, incidents and near misses across the Group will be reported using the online reporting system. Accident, incident and near miss statistics and information will be communicated as part of the health and safety reporting function to various parts of the Group to enable learning to be taken and implemented from these events.

### RIDDOR

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) place a duty on the Group to report certain incidents to the HSE, as defined in the regulations.

The H&S team will submit all RIDDOR notifications to the HSE. RIDDOR statistics and information will be communicated as part of the health and safety reporting function to various parts of the Group.

### Incident reporting for Care and Support services including registered care facilities

In addition to the online reporting system, Care and Support Services including registered care services will maintain and follow local policies and procedures to ensure compliance with reporting as required, under their registration with the regulator i.e. CQC (where applicable) and/or funding bodies.

### Incident Investigation

Significant incidents as determined by the H&S Team and/or affected department/function will be investigated in order to identify root causes, lessons learned and gather information for insurers (when required). These findings will then be communicated as appropriate.

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## Health and Safety Reporting

Accident and incident data will be compiled from the online reporting system and communicated to various levels of the organisation to enable those who have specific responsibilities regarding health and safety to be adequately informed.

Analysis of health and safety data will be completed by the H&S team to identify trends and / or specific areas requiring attention. This analysis will be communicated to the H&S Committee and other colleagues (as appropriate).

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### **Health and Safety Management System Review**

The processes that form the Health and Safety Management System will be reviewed regularly to enable continual improvement. |

## Part 4

# Policy implications

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## Roles and responsibilities

**All persons involved with the Group, whether Board Member, or employee have delegated responsibilities. The key roles and responsibilities are listed below.**

### Group Board

The Board is responsible for ensuring that there is an effective policy in place.

### Executive Management Team

The Chief Executive, Executive Directors and Directors collectively are the officers responsible for ensuring the implementation of the Group's objectives in this policy.

### Policy Sponsor - Executive Director of **People and Performance**

Strategic responsibility for the policy and how it relates to business plans, key strategies and other elements of the policy framework.

### Policy Owner – Director of **Governance and Compliance**

Responsible for the policy's suitability; effective implementation; and commissioning new policy development and periodic policy review.

### Policy Author – **Head of Health and Safety**

Responsible for drafting a new policy and proposing any amendments to an existing policy.

### Data Protection – Data Protection Officer

Responsible for identifying, assessing and mitigating privacy risks with data-processing activities that fall within the policy.

### Customer Engagement Team

Responsible for leading on policy consultation with customers and the Customer Forum.

### Respective Heads of Department and Team Managers/Leaders

Procedural responsibility specific to departments for the management of health and safety. Ensuring their team undertake day-to-day tasks in a healthy and safe manner that is in line with relevant risk assessments and agreed work practices.

### All colleagues

Every employee has a duty whilst at work to take reasonable care of their health and safety and of others who may be affected by their acts or omissions at work and co-operate with their employer to enable employer H&S duties to be complied with.

### **Data protection**

Essential personal data is captured as part of the incident reporting process as per the requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, this data is securely stored and retained for 5 years as per the Group's insurance requirements.

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### **Safeguarding**

Any incidents reported that have potential safeguarding concerns are identified and communicated to the Safeguarding team.

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### **Equality, diversity and inclusion**

The Group is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following protected characteristics; Age, Disability, Race, Gender Reassignment, Sexual Orientation, Religion or Belief, Marriage and Civil Partnership and Pregnancy and Maternity.

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### **Complaints and feedback**

The Group will consider any complaints relating to the policy from customers, colleagues, contractors and suppliers as required.

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### **Risk analysis**

The Risk Analysis section within the Policy Development Plan (PDP) identified the following risks and mitigating actions:

- Noncompliance with H&S legislation, this is mitigated by having a H&S Policy in place.
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### **Evaluation, review and performance reporting**

This policy will be reviewed on a Biennial basis to ensure that it remains fit for purpose. A policy review may also be required earlier, in response to internal or external changes, for example changes in legislation. Prompt and effective action will be taken where improvements are identified.

The policy will be evaluated for effectiveness via the H&S Committee as well as through the quarterly RIDDOR Reports to Group Board, six-monthly reports to Audit and Risk Committee, and Annual Board Report, as well any customer related aspects via the customer forum.

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### **Summary of local variations**

Local variations to the policy may be required, these will be addressed on a case-by-case basis with formalised procedures established.

## Part 5

# Compliance

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## Legal and regulatory compliance

This policy fully complies with the Group's legal and regulatory obligations.

- Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Health and Safety (Consultation with Employees) Regulations 1996
- The Health and Safety (Display Screen Equipment) Regulations 1992 (as amended 2002)
- The Provision and Use of Work Equipment Regulations 1998
- The Lifting Operations and Lifting Equipment Regulations 1998
- The Working at Height Regulations 2005
- The Control of Substances Hazardous to Health Regulations 2002
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Construction (Design and Management) Regulations 2015

This list is not exhaustive, and policy authors will undertake thorough research and/or seek professional advice to ensure the Group meets its obligations and complies with the current and relevant legislation and regulations.

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## Related policies

- Asbestos Management Policy
- Legionella Management Policy
- Fire Safety Policy
- Electrical Safety Policy
- Lift Maintenance Policy
- Domestic and Communal Heating Policy
- Construction Design and Management Policy
- First Aid Policy
- Estate Management Policy
- Prevention and Control of Infection Policy
- Smarter (Home) Working Policy
- Lone Working Policy

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Part 6

## Appendices

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### A. Glossary of terms

<b>Term</b>	<b>Definition</b>
<b>Legislation</b>	The legal requirements that must be followed.
<b>Policy</b>	A statement of intent describing our approach towards a particular activity or area – usually comprising a set of rules or standards that must be followed.
<b>Policy Development Plan (PDP)</b>	The document used to support planning policy development and review.
<b>Procedure</b>	An agreed way of doing things that describes how a policy will be implemented. The specific steps and/or actions that must be taken to put policy into practice and ensure a consistent service.
<b>Regulation</b>	The rules or standards set by a governing body such as the Housing Ombudsman, Regulator of Social Housing and Financial Conduct Authority.

## **B. Associated documents**

- Policy Development Plan