

HEALTH & SAFETY POLICY

APPROVED BY HHP BOARD:
February 2025
EFFECTIVE DATE:
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hebridean housing
partnership

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AIMS

- 1.1 The aim of this policy is to set out the responses of the Partnership to its responsibilities to manage Health & Safety for its employees and across all its activities.

HEALTH AND SAFETY STATEMENT

- 2.1 The Board is responsible for the conduct of the business of the Partnership.
- 2.2 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 Hebridean Housing Partnership so far as is reasonably practicable, to ensure responsibilities for safety and health are assigned, accepted and fulfilled at all levels of the Partnership. The Partnership will ensure 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
- 2.3 It is the intention of the Partnership, so far as is reasonably practicable, to ensure that:-
- a) The working environment of all employees is safe and without risks to health and that adequate provisions are made with regard to the facilities and arrangements for their welfare at work. This includes both office and home working, and any other location that employees may be asked to work in.
 - b) 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.
 - c) Arrangements for use, handling, storage and transport of articles and substances for use at work are safe and without risks to health.
 - d) 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.
 - e) Employees are provided with such instruction, training and supervision as is necessary to secure their health and safety.
 - f) The Health and Safety Policy will be reviewed at least annually. Communication of any such changes will be made to all employees.

- 2.4 It shall be the duty of all employees at work to ensure:-
- a) That 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.
 - b) Co-operation with the Board of Management 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.

RESPONSIBILITIES

Overview of Responsibilities

- 3.1 The Partnership recognises that all individuals within the organisation have a responsibility to ensure their own safety and that of others. Consequently, all employees will have the potential to be held liable if their negligent acts or omissions result in harm being caused to any other persons. Those in positions of responsibility have additional obligations, by virtue of their 'managerial' functions. Indeed, the Health and Safety Executives (HSE) Enforcement Policy Statement, HSE41, Paragraph 43 notes the following on 'Prosecution of individuals':

"enforcing authorities should identify and prosecute or recommend prosecution of individuals if they consider that a prosecution is warranted. In particular, they should consider the management chain and the role played by the Chief Executives and Directors, and should take action against them where the inspection or investigation reveals that the offence was committed with their consent or connivance or to have been attributable to neglect on their part and where it would be appropriate to do so in accordance with this policy. Where appropriate, enforcing authorities should seek disqualification of Directors under the Company Directors Disqualification Act 1986."

- 3.2 The following sections set out the principal Health & Safety related responsibilities of individuals within the organisation. These duties will be in addition to the general duty on all individuals to ensure the Health, Safety and Welfare of themselves and all others who may be affected by their undertakings.

Responsibilities - Board

- 4.1 The Board, headed by a Chairperson, comprises 'lay persons' from the local community, acting as a body to oversee the operations carried on by the Partnership.
- 4.2 It is recognised that the Board, while not actively involved in the daily running of the organisation, are collectively responsible for providing leadership and direction on Health & Safety. The Chief Executive shall be responsible for implementing any audit recommendations identified for the improvement of HHP's Health & Safety.
- 4.3 The Board will endorse the Health & Safety policy and Control Manual and the Chairperson will sign the Health & Safety Policy Statement along with the Chief Executive. 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.
- 4.4 The Board will place 'Health & Safety' as a standing item on the Agenda of all general meetings. This will allow the Chief Executive to report on safety performance, funding 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.
- 4.5 The Board will review the findings of all internal and external Health & Safety audits carried out within the organisation and will authorise the use of all reasonable support required to rectify any significant non-compliances identified by the audits.
- 4.6 The Board will take an active interest in the investigation of any significant safety failure, making available all reasonable resources for a full investigation and for the taking of adequate measures to rectify any deficiencies in the existing arrangements.
- 4.7 All Board members will undergo training in 'Health & Safety Awareness' and in management responsibilities. 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.
- 4.8 All Board Members shall review their responsibilities at least annually.

Responsibilities – Chief Executive

- 5.1 The Chief Executive is responsible for the general day to day running of the Partnership. 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. In essence, the Chief Executive will fulfil the position now commonly known as 'Director Responsible for Health & Safety' and shall be responsible for implementing the Board's plan for Health & Safety.
- 5.2 The Chief Executive will endorse the Health & Safety policy and Health and Safety Manual and will sign the Health & Safety Policy Statement along with the Chairperson of the Board. Where there is a change of personnel, the incoming Chief Executive will sign the policy to demonstrate commitment and acceptance of responsibilities.
- 5.3 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, the Chief Executive will appoint an adequate number of competent persons to achieve and maintain legal compliance. This will include a Health & Safety Administrator. 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. The Chief Executive may be held liable where Health & Safety offences are committed with his/her consent or connivance or as a result of his/her negligence (Health & Safety at Work etc. Act Section 37(1)).
- 5.4 The Chief Executive will report on safety performance, funding requirements, safety failures and other Health & Safety related issues at each Board meeting, as well as make available all internal and external audit reports to the Board. Fully justified requests will be made to the Board for any resources, support or funding required for Health & Safety purposes.
- 5.5 The Chief Executive will ensure that Health & Safety considerations are taken into account for all new investment opportunities and in the organisation's purchasing policy. The objective will be to minimise risks as early in the purchasing chain as is reasonably practicable.

- 5.6 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.
- 5.7 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.
- 5.8 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.
- 5.9 The Chief Executive will ensure that all significant safety failures are fully investigated and reported to the Board. The Chief Executive 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.
- 5.10 The Chief Executive will give due consideration to all Health & Safety related requests from H&S Administrator, Heads of Departments and all other staff, taking appropriate action where necessary and requesting support/approval from the Board of Management where required.
- 5.11 The Chief Executive shall review their responsibilities at least annually.

Responsibilities - Directors

- 6.1 The Director of Finance & Corporate Services and Director of Operations provide operational support to the Chief Executive and discharge many of the day to day management tasks required in the running of the organisation. It is, therefore, recognised that this function incurs some significant responsibility in terms of Health & Safety. In particular, the Directors may be held liable where Health & Safety offences are committed with their consent or connivance or as a result of their negligence.
- 6.2 The Director of Finance & Corporate Services and Director of Operations will take an active participation in the Health & Safety Committee. This will involve advising the Chief Executive of pertinent issues for consideration by the Board.
- 6.3 The Director of Finance & Corporate Services and Director of Operations will take an active role in the Risk Assessment programme, arranging for the undertaking of all

appropriate risk assessments and reviews, for the dissemination of findings and for seeking approval from the Chief Executive for remedial measures required to be taken. The Director of Finance & Corporate Services and Director of Operations will also ensure that any remedial measures agreed with the Chief Executive are effectively actioned.

- 6.4 The Director of Finance & Corporate Services and Director of Operations will give all safety related queries due consideration, liaising with the Chief Executive, H&S Administrator, Team Leaders, EVH Health & Safety Support Service and all other relevant bodies as appropriate.

Responsibilities – Managers

- 7.1 Due to the function performed by Managers, it is recognised that they may be held liable where Health & Safety offences are committed with their consent or connivance or as a result of their negligence.
- 7.2 Managers will take an active participation in the Health & Safety Committee. This will involve the identification of Health & Safety concerns within their departments, the raising of pertinent issues for consideration by the Committee and the actioning of all measures identified by the Committee and management staff as being required.
- 7.3 Managers will implement all relevant policies, procedures and arrangements within their departments, as required by the Health and Safety Manual, the Health & Safety Committee and management staff.
- 7.4 Managers will ensure that adequate communication channels exist throughout their team 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 their Line Managers or Directors.
- 7.5 Managers will ensure that all 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.

- 7.6 Where Managers identify the need for further training or any other form of risk control for staff, the issue will be reported without undue delay to the Health & Safety Committee or appropriate Director.
- 7.7 Where Managers identify any significant breach of Health & Safety procedures, appropriate action will be taken to reduce the risk in the short term, and the issue will be reported to the appropriate Director without undue delay.

Responsibilities – Employees

- 8.1 While the duties of management 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 themselves and of other persons who may be affected by his/her acts or omissions at work; and
 - (b) as regards any duty or requirement imposed on his/her employer or any other person by or under any of the relevant statutory provisions, to co-operate with him/her so far as is necessary to enable that duty or requirement to be performed or complied with."
- 8.2 The procedures as set out in the Health and Safety Manual will, therefore, be adopted by all employees to ensure their duties are adequately discharged.
- 8.3 Employees will comply with the policies, procedures and arrangements set out in the Health and Safety 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.
- 8.4 Employees will report to their Team Leader or other member of management any identified breaches of Health & Safety procedures, any accidents 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.

- 8.5 Employees will inform their Team Leader or other member of management, without undue delay, where they believe that further training or other risk control measures would be beneficial. Tasks will not be carried out where the employee believes significant risk to be present.
- 8.6 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.
- 8.7 Employees will not participate in horseplay, practical jokes or other acts which may result in harm being caused to themselves or to other individuals.

Responsibilities - H&S Committee

- 9.1 The H&S Committee will provide an open forum for the discussion of all Health & Safety related issues raised by members of the Committee and by any other relevant sources.
- 9.2 All Committee 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 in the Committee and within the organisation as a whole.
- 9.3 The Committee will suggest solutions and initiatives for issues arising, which will be minuted and presented to the Chief Executive following each meeting, without undue delay.
- 9.4 Where appropriate, the Committee will draft and revise policy, procedures and arrangements, for ultimate approval by the Chief Executive and Board.
- 9.5 The Committee 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.

- 9.6 The Committee will review the Health & Safety performance of the organisation, analysing accident statistics, reported breaches of policy and procedures, audit and inspection reports and data from other information gathering exercises. Recommendations on options to improve safety performance will be made to the Chief Executive without undue delay.

Responsibilities - H&S Administrator

- 10.1 The function of the H&S Administrator is, by definition, one of 'administration' as opposed to 'management'. The H&S Administrator will be fully supported by the Chief Executive, Directors and Heads of Departments.
- 10.2 The H&S 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 Health and Safety Manual.
- 10.3 The H&S Administrator will maintain the master Health and Safety Manual 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.
- 10.4 The H&S Administrator will comply with his/her duties as set out in the Health and Safety Manual and will report the findings of any inspections, audits and other information gathering exercises to the H&S Committee without undue delay. Where the H&S Administrator has reason to believe that personnel are, or may foreseeably become, exposed to significant risk, direction will be sought from the Chief Executive without undue delay.
- 10.5 The H&S Administrator will provide assistance to the Chief Executive, Directors, Team Leaders and the H&S Committee in the undertaking of risk assessments, control implementation, policy development, etc. This may include expert advice on Health & Safety. It should be noted that the H&S Administrator will not be solely responsible for developing corporate policy, merely for assisting in its development and implementation.

RISK MANAGEMENT

- 11.1 The Partnership will pursue progressive improvements by the development and implementation of a risk management strategy in relation to health and safety, to contribute to the reduction of occupational injuries and ill health.
- 11.2 The Chief Executive will ensure that a risk assessment programme is drawn up. The Corporate Resources Team will implement this programme.
- 11.3 The Health and Safety Administrator will provide advice and, where necessary, arrange for training in risk assessment techniques.
- 11.4 While the Management of Health and Safety at Work Regulations 1999 require all work activities to be assessed, other more specific regulations require that particular activities receive more attention - Use of hazardous substances (COSHH), Display Screen Equipment (DSE), Manual Handling Operations (MHO), Exposure to Noise and Personal Protective Equipment.
- 11.5 In addition specific policies have been developed in relation to:
- Alcohol and Drug Use;
 - Fire Safety;
 - Lone Working;
 - New and Expectant Mothers;
 - Smoking at Work
 - Stress Management;
 - Violence and Aggression (see Section 18); and
 - Young Workers.

EMERGENCY PROCEDURES

- 12.1 Procedures to be followed by any person at work if situations presenting serious and imminent danger arise will be established in accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999. These procedures will set out the role and responsibilities of competent persons nominated to implement any detailed actions and will ensure that other employees know who the competent persons are and understand their own role. Where appropriate, they will also contain special action required for the evacuation of disabled persons.

HEALTH AND SAFETY MANUALS AND STANDARDS

- 13.1 The Chief Executive will ensure that the Policy is supported through a suitable Health and Safety Manual.
- 13.2 The Health and Safety Administrator will compile procedures where they are required or specific major hazards are identified in any work activity.

FIRST AID PROVISIONS

- 14.1 Sufficient numbers of trained First Aid Personnel will be appointed in each team to deal with workplace accidents and injuries as indicated by the results of a Risk Assessment.
- 14.2 A nominated First Aider will be appointed in each office.
- 14.3 Training will be through an HSE-approved body, selected by the Health & Safety Administrator, and each Team Leader must nominate a responsible person(s) to co-ordinate the training needs of their service and liaise with the chosen training body.

HEALTH AND SAFETY TRAINING

- 15.1 The Health and Safety Administrator is responsible for ensuring that all employees are trained in all the health and safety aspects of their work activities. Such training is necessary for all employees:
 - (a) On joining the Partnership; and
 - (b) When the risks faced alter or increase due to:
 - a significant change in activities or responsibilities;
 - a significant change in equipment or technology; and
 - a significant change in the system of work.
- 15.2 Training must be repeated or updated as necessary. Training must extend to supervisory and managerial staff and must cover legal and organisational responsibilities as well as practical training. Relevant records must be maintained.

CONTRACTORS

- 16.1 The Partnership will define the standards required and will monitor the activities of contractors carrying out work for the Partnership in order to minimise risks to employees, other persons on site and members of the public.
- 16.2 Contractors will be required to provide a detailed Health & Safety Method Statement and any health & safety documentation relevant to the contract.
- 16.3 The Partnership will develop a document on 'Safety Rules for Contractors' and distribute it to all approved Contractors

VIOLENCE AT WORK

- 17.1 The Partnership will establish systems and working practices that recognise the potential risk to staff from acts of violence. The Partnership will develop mechanisms by which acts of violence to the staff are eliminated or minimised wherever possible.
- 17.2 The Partnership realises that violence, whether physical or in the form of verbal threats, including online and social media threats, must be considered in the course of risk assessment and teams are expected to take suitable preventive and protective measures, including the drawing up of suitable written standards and the provision of training where necessary.

MONITORING AND REVIEW OF POLICY

Review of Policy

- 18.1 The Partnership's Health and Safety Policy and any revision of it will be drawn to the attention of every employee of the Partnership. The contents of the documents produced under the policy will be brought to the attention of all employees to which the contents are relevant.
- 18.2 The policy and any documentation produced under it will be added to or modified as required and will be reviewed every three years. The lists of approved Contractors and Consultants reviewed annually.
- 18.3 The Board of Management or relevant sub-committee will receive the annual reports on the working of this policy and Health and Safety will be a standing item on the Board's agendas.

Scheme of Delegation

19.1	<table><tr><th>Responsible Committee</th><th>Board of Management</th></tr><tr><td></td><td><i>To whom delegated</i></td></tr><tr><td>Formulation and monitoring of policy</td><td>Board</td></tr><tr><td>Policy Amendments</td><td>Board</td></tr><tr><td>Implementation of policy</td><td>Chief Executive</td></tr><tr><td>Formulation and implementation of relevant procedures</td><td>Chief Executive</td></tr></table>	Responsible Committee	Board of Management		<i>To whom delegated</i>	Formulation and monitoring of policy	Board	Policy Amendments	Board	Implementation of policy	Chief Executive	Formulation and implementation of relevant procedures	Chief Executive
Responsible Committee	Board of Management												
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Formulation and monitoring of policy	Board												
Policy Amendments	Board												
Implementation of policy	Chief Executive												
Formulation and implementation of relevant procedures	Chief Executive												

Breaches of Policy

- 20.1 If a Board Member knowingly breaches the conditions of this policy, this will be grounds for removal from Office in accordance with the Partnership's procedures for removal of a Board Member.
- 20.2 If a staff member knowingly breaches the conditions of this policy, this will be grounds for disciplinary action.

INTERPRETATIONS & ABBREVIATIONS

The following interpretations and abbreviations are used in this policy:

WORD	INTERPRETATION
<i>HHP or Partnership</i>	Hebridean Housing Partnership
<i>Board</i>	Means the Board of the Hebridean Housing Partnership
<i>Board Members</i>	All Members of the Board including co-opted Members
<i>COSHH</i>	Control of Substances Hazardous to Health
<i>DSE</i>	Display Screen Equipment
<i>MHO</i>	Manual Handling Operations
<i>Risk Assessment</i>	A systematic process of evaluating the potential risks that may be involved in a projected activity or undertaking.
All references to the masculine gender in this policy shall read as equally applicable to the feminine gender	



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