

HS-PP-00 Health & Safety Management Policy

Policy Owner:	Executive Director of People and Culture
Policy Lead:	Head of Health, Safety and Facilities Management
Approved by:	Executive Team
Approved date:	May 2024
Next review date:	One year after approval

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Purpose and scope of the policy

This policy is required to comply with the Health and Safety at Work etc Act 1974. It defines the roles and responsibilities Moat has at all levels of the organisation and is a declaration / commitment by the Chief Executive Officer supported by the Chair of Moat's Board that controls are in place to reduce the risk of harm to all those affected by our actions to a level that's as low as is reasonably practicable.

This policy is an overarching document under which sits a suite of policies and procedures covering all other aspects of health and safety which affect Moat.

This policy applies to all Moat employees for the roles they carry out and those who carry out work on behalf of Moat.

Note: At the time of this review the Chief Executive Officer was being backfilled by the Executive Director of Growth, with vacancy and interim Executive Directors in the Executive Team. When the Executive Team structure is finalised, the policy will be reviewed to reflect the changes.

1. Policy

- 1.1 At Moat Homes Limited (Moat) we are committed to meeting our responsibilities as a landlord and employer to ensure, as far as is reasonably practicable, the health, safety and welfare of our employees, customers and others who may be affected by our actions. A policy statement setting out our commitments to health, safety and welfare is set out in Appendix 1 to this document.
- 1.2 The main laws and regulations that apply to us are set out in the 'Related legislation and regulations' section of this document. They have informed the content of this policy which also helps our employees to understand their duties and responsibilities.
- 1.3 Alongside our legal obligations, our desire to ensure a healthy and safe working and living environment is driven by our values which guide our behaviours. Our values are to:
 - Lead by example,
 - Better together,
 - Own it,
 - Be the change
- 1.4 This policy is supported by a range of policies and procedural documents that relate to health, safety and welfare.
- 1.5 To comply with the Health and Safety etc. Act 1974 Section 2(3) this policy includes the following three sections:
 - a) Policy Statement (Appendix 1)
The Policy Statement of intent is the written declaration by the Acting Chief Executive Officer on behalf of Moat's Board, as to the company's intentions

with regard to the health, safety and welfare of employees and others who may be affected by the company's operations. For Moat this statement is signed both by the Acting Chief Executive Officer and by the Chair of the Board, then displayed in offices occupied by Moat employees.

b) General Responsibilities (Roles & Responsibilities)

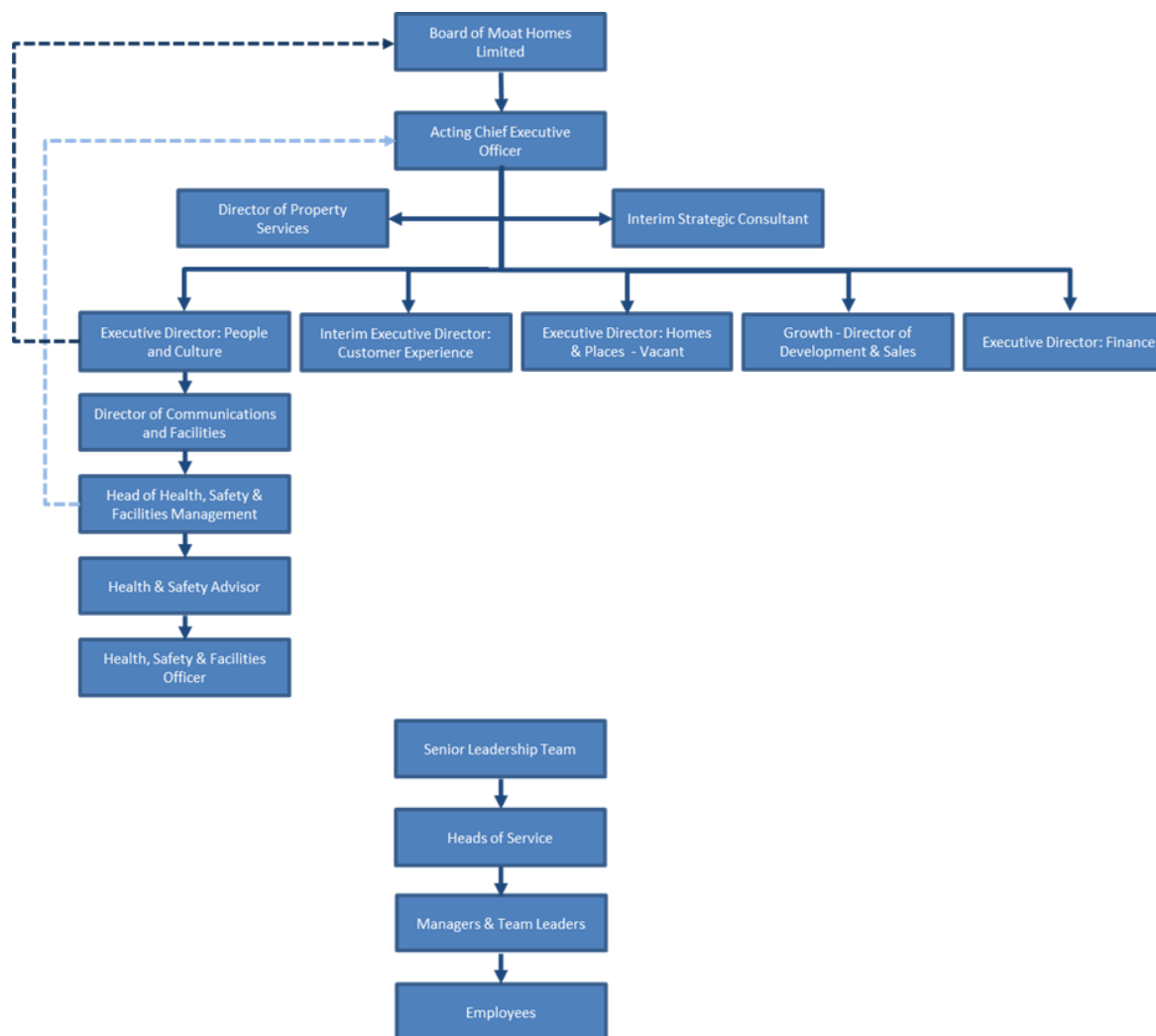
This section deals with personal responsibility for health, safety and welfare at work. Everyone employed by Moat will have responsibilities in implementing and abiding to this policy.

c) Practical Arrangements (Implementing This Policy)

This section deals with the arrangements which have been or will be introduced to make sure that the policy actually works. It includes procedures for the recognition of hazards, investigating accidents and arrangements for dealing with emergencies.

2. General Responsibilities (Roles & Responsibilities)

All employees have personal responsibilities for health, safety and welfare at work and in implementing this policy. Our hierarchy and the responsibilities of individuals are summarised below.



This chart of hierarchy may be subject to change. The latest version will be maintained on Moat's intranet

2.1 **Board**

The Board of Moat will:

- Ensure an appropriate framework of accountability and responsibility for health and safety.
- Ensure the Acting Chief Executive Officer has sufficient understanding, training, resources and competent advice to enable Moat to discharge its health and safety responsibilities.
- Ensure, so far as is reasonably practicable, that any decisions made by the Board do not impact negatively on health and safety.
- Receive reports on a regular basis from the Acting Chief Executive Officer (or an appropriate person on their behalf) on the implementation of this Health and Safety Management Policy, and its supporting procedures.
- Review health and safety activities within Moat.
- Ensure appropriate governance arrangements are in place for oversight, scrutiny and assurance of health and safety management and compliance at Moat.

2.2 **Acting Chief Executive Officer**

The Acting Chief Executive Officer holds overall responsibility for the health and safety performance of Moat and will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Ensure the Health and Safety Management Policy is implemented, reviewed periodically and as circumstances determine, is revised and that such revisions are brought to the attention of every employee.
- Oversee the effective application of this Health and Safety Management Policy, including ensuring adequate resources are available to meet its requirements.
- Ensure that disciplinary procedures are adequate to deal with those who breach the Health and Safety Management Policy.
- Escalate health and safety issues to Moat's Board.
- Ensure the Executive Team has sufficient understanding, training, resources and competent advice to enable Moat to discharge its health and safety responsibilities.
- Ensure that the health and safety implications of all major decisions are understood by the Executive Team.
- Ensure that all accidents, incidents and cases of serious occupational ill health are brought to the attention of the Executive Team.
- Report annually to Moat's Board on the health and safety performance of the organisation and agree with them the health and safety objectives for the following year.
- Hold overall responsibility for Moat's health and safety training programme.
- Named Principal Accountable Person for the Building Safety Act
- Act as Duty Holder for policies and procedures overarched by this

document which are specific to statutory landlord health and safety compliance (Fire, Legionella, Asbestos, Gas, Electric, Lifts (FLAGEL)).

- In the execution of the duties placed upon them by health and safety legislation and this policy, delegate the performance of those duties to the Executive Team.

2.3 **Executive Director: People and Culture**

The Executive Director will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Oversee the effective co-ordination and regular reporting of compliance with the Health and Safety Management Policy.
- Ensure that any incidence of non-compliance with health and safety regulations identified within Moat is escalated to the Acting Chief Executive Officer, and that plans are put in place to achieve full compliance.
- Act as Duty Holder for policies and procedures overarched by this document which require such a position to be in place, except those which fall within FLAGEL.
- Have strategic responsibility for the development, implementation and monitoring of Moat's Health and Safety Management Policy, and delegate this, along with operational responsibility, to the head of Health, Safety and Facilities Management
- Ensure that all employees under their control are fully aware of the responsibilities that they have in regard to this overarching Health and Safety Management Policy and the relevant supporting procedures.
- Ensure that all employees under their control have the necessary training and resources to discharge their responsibilities effectively.

2.4 **Interim Executive Director: Customer Experience**

The Executive Director will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Hold overall responsibility for ensuring that the management, maintenance and refurbishment of all empty homes is carried out in a safe and healthy manner.
- Ensure that suitable procedures are in place for the proper selection and supervision of contractors engaged to work on Moat's behalf for the area under their control.
- Ensure that all employees under their control are fully aware of the responsibilities that they have in regard to this overarching Health and Safety Management Policy and the relevant supporting procedures.
- Ensure that all employees under their control have the necessary training and resources to discharge their responsibilities effectively.

2.5 **Executive Director: Finance**

The Executive Director will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Hold overall responsibility for ensuring that sufficient funds are made available across the business to enable Moat to discharge its health and safety responsibilities and achieve full compliance.
- Ensure that, so far as is reasonably practicable, financial decisions do not have a negative impact on health and safety.
- Ensure that all employees under their control are fully aware of the responsibilities that they have in regard to this overarching Health and Safety Management Policy and the relevant supporting procedures.
- Ensure that all employees under their control have the necessary training and resources to discharge their responsibilities effectively.

2.6 **Director of Property Services**

The Director will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Hold overall responsibility for ensuring the implementation of the Health and Safety Management Policy and supporting procedural documents on sites where Moat has a maintenance responsibility.
- Develop health and safety policies and procedural documents in conjunction with the Head of Health, Safety and Facilities Management as necessary to ensure effective implementation of all relevant health and safety arrangements for Property Services, commissioning third party expertise as required.
- Escalate any significant health and safety events which occur on maintained sites or affect contracts operated on behalf of Moat.
- Take senior management responsibility for the health and safety of Moat's residential portfolio insofar as it relates to matters under their control to ensure the health and safety of employees, our customers, visitors, and contractors.
- Ensure employees with designated responsibilities for health and safety compliance have sufficient competence, access to competent advice and sufficient resources, so far as is reasonably practicable, to discharge their responsibilities.
- Ensure all maintenance and repairs contractors have been accredited in terms of health and safety competence with supporting evidence.
- Ensure that all contractors engaged to work on Moat's behalf carry out their respective responsibilities for health, safety and welfare of employees and others.
- Ensure that fire, legionella, asbestos, gas, electrical, lifts (FLAGEL) and other facets of safety covered by Property Services including disrepair and damp and mould are in adherence to the applicable legislation, policy and procedural documents.
- Ensure any identified non-compliance with health and safety regulations within Moat maintained sites or contracts is escalated to an Executive Director and the Head of Health, Safety and Facilities Management with plans put in place to gain compliance.

2.7 Director of Development & Sales

The Director will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Ensure the implementation of the Health and Safety Management Policy and supporting procedural documents on development sites.
- Develop health and safety procedural documents in conjunction with the Head of Health, Safety and Facilities Management as necessary to ensure effective implementation of all relevant health and safety arrangements as they relate to development, commissioning third party expertise as required.
- Escalate any significant health and safety events which occur on development sites or affect contracts operated on behalf of Moat.
- Ensure employees with designated responsibilities for health and safety compliance have sufficient competence, access to competent advice and sufficient resources, so far as is reasonably practicable, to discharge their responsibilities.
- Ensure all development contractors have been accredited in terms of health and safety competence with supporting evidence.
- Ensure that where Moat is acting as a client or designer under the Construction (Design and Management) Regulations, that full compliance with the regulations is achieved.
- Ensure any identified non-compliance with health and safety regulations within Moat maintained sites or contracts is escalated to an Executive Director and the Head of Health, Safety and Facilities Management with plans put in place to gain compliance.

Note - The above responsibilities may be delegated to those that are competent.

2.8 Head of Health, Safety & Facilities Management

The Head of Service will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Ensure that the Health and Safety Management Policy and the supporting procedural documents are implemented, remain valid and up to date with statutory requirements.
- Advise the Acting Chief Executive Officer, Executive Team and Senior Leadership Team of new legislation or significant external events relating to health and safety that may impact on Moat's activities, employees or property.
- Take responsibility for the implementation of procedural documents and monitoring of compliance with regards to the health, safety and welfare of Moat employees and all others affected by Moat's business.
- Collate and analyse health and safety data and statistics and report these to the relevant forums.
- Liaise directly with management teams on health and safety matters and assist them in introducing practices that provide continual improvements to the health and safety standards within Moat.

- Chair the Health and Safety Committee.
- Undertake scheduled and unscheduled inspections, audits and internal assurance engagements, working with key stakeholders to address any shortcomings.
- Liaise with and act as point of contact for Moat with external health and safety enforcement bodies.
- Record, manage and report to the Health and Safety Executive all accidents, incidents, dangerous occurrences, and diseases which fall under the criteria of 'The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations' (RIDDOR).
- Consider the implications of new legislation and recommend action where necessary.
- Advise on health and safety training, in liaison with People Services.
- Encourage a positive safety culture through promotion of all health and safety matters.
- Take senior management responsibility for the health and safety of Moat's commercial portfolio insofar as it relates to matters under their control to ensure the health and safety of employees, customers, visitors and contractors.

Note – Some of the above responsibilities may be delegated to those that are competent.

2.9 **Senior Leadership Team and Heads of Service**

SLT and Heads of Service will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Be responsible for implementing and monitoring Moat's Health and Safety Management Policy and supporting procedural documents within their operational span of control.
- Ensure that, where appropriate, rules and safe working practices are developed, formalised and implemented.
- Ensure that risk assessments are carried out in their area of control, recorded, communicated and monitored for the effectiveness of health and safety measures taken to reduce risks.
- Ensure that, where appropriate, safety inspections are carried out regularly, that records of these inspections are maintained, and any issues identified are acted upon in a timely manner.
- Ensure that managers under their control have sufficient health and safety training, competence, access to competent advice and resources to discharge their health and safety duties.
- Ensure that managers under their control carry out their responsibilities for the health, safety and welfare of employees and others.
- Ensure that contractors engaged to work on Moat's behalf carry out their respective duties for the health, safety and welfare of employees and others.
- Ensure that all employees have a safe place to work, that safety rules are observed, and that safety clothing and equipment is supplied and properly used.

- Ensure that employees are informed, instructed, trained and managed in safety matters. This includes new employees and employees transferring to different roles within Moat.
- Ensure that incidents, near-misses and dangerous occurrences are reported in line with HS-PP-03 Accident, Incident & Near Miss Reporting & Investigation Procedure.
- Act immediately upon any observed or reported breach of safety rules.
- Encourage employees to identify and report any hazards or risks that may require attention.

2.10 Line Managers and Team Leaders

Line Managers and Team Leaders will:

- Lead by example when considering health and safety in all aspects of day-to-day business.
- Ensure that working practices, work equipment and the working environment within their area of responsibility do not adversely impact the health and safety of employees or others.
- Ensure that all their employees have received adequate training to enable them to work safely.
- Carry out risk assessments as required in their areas of responsibility and ensure that the necessary control procedures are implemented.
- Report any health and safety concerns to their line managers and to the Head of Health, Safety and Facilities Management.

2.11 Health and Safety Advisor

The Advisor will:

- Escalate health and safety issues to the Head of Health, Safety and Facilities Management.
- Order the cessation of any process or activity which they consider to be unsafe or in breach of the Health and Safety at Work etc Act 1974 or any of the health and safety regulations.
- Manage an incident database and ensure that incidents are investigated, remedial measures are taken, and lessons learnt are identified and acted upon.
- Provide competent and professional advice and assistance with regards to health and safety matters to all levels of employees.
- Undertake scheduled and unscheduled inspections, audits and internal assurance engagements, working with key stakeholders to address any shortcomings.
- Undertake shadowing of colleagues' working practices to pass on shared learning from accidents, incidents reported and insurance claims which may be pertinent to their colleague's role.
- Assist others with accident and dangerous occurrence investigations.

- Provide support and assistance to those who are required to implement the requirements of the Health and Safety Management Policy and the supporting procedural documents.
- Encourage a positive safety culture through promotion of all health and safety matters.

2.12 **All Employees**

Employees will:

- Ensure that they conduct themselves at work in ways that do not put themselves at risk, nor others who may be affected by their acts or omissions.
- Ensure that all work equipment is used, and all activities are carried out in the way they have been trained.
- Cooperate with management as they seek to discharge their health and safety duties.
- Report any health and safety shortcomings or situations of imminent danger to their line manager, or the Health, Safety and Facilities Management team.
- Ensure they adhere to the requirement of this Health and Safety Management Policy and supporting procedures.

2.13 **Health and Safety Committee**

The Health and Safety Committee comprises management and employee representatives and will:

- Review health and safety arrangements and procedures and provide feedback that supports sound health and safety management and continuous improvement.
- Review incidents that are reported and, where appropriate, recommend remedial actions.
- Provide assistance and feedback in the development of safety rules and safe systems of work.
- Participate in the consultative process for new/updated health and safety processes or procedure documents.
- Represent the interests of employees in matters of health, safety and welfare.
- Communicate health and safety information back to relevant parts of the business.
- Encourage a positive safety culture through promotion of all health, safety and welfare matters.
- Report via the chair to the Executive Team.

3. Implementing this Policy (Practical Arrangements)

3.1 Moat has in place various practical arrangements to support the implementation of this overarching Health and Safety Management Policy. These include but are not limited to:

- Policies and procedures which cover health and safety legislation, approved codes of practice (ACOP's) and guidance relevant to Moat.
- Templates and forms which are used in conjunction with the procedures.
- Process maps which give a simplistic, logical instruction on how to achieve the requirements of the procedures.
- Training from both internal and external providers for employees to increase their competence to undertake their roles and responsibilities as laid out in the procedures.

Definitions

- **As low as is reasonably practicable** - This involves weighing a risk against the trouble, time and money needed to control it.
- **FLAGEL** – Those risk areas which are specific to statutory landlord health and safety compliance - Fire, Legionella, Asbestos, Gas, Electric, Lifts

Equality, Diversity and Inclusion

This policy will be delivered in accordance with our Equality, Diversity and Inclusion Policy. An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

Data protection

This policy will be delivered in accordance with our Data Protection Policy. A Data Impact Assessment was completed for this policy and considered as part of the approval process.

Related legislation and regulations

Health and Safety Related Laws and Regulations

- Health and Safety at Work etc Act 1974
- Control of Asbestos Regulations 2012
- The Construction (Design and Management) Regulations 2015
- The Health and Safety (Consultation with Employees) Regulations 1996
- The Control of Substances Hazardous to Health (Amendment) Regulations 2004
- Corporate Manslaughter and Corporate Homicide Act 2007

- The Health and Safety (Display Screen Equipment) Regulations 1992 (as amended 2002),
- The Electricity at Work Regulations 1989
- The Fire Safety (England) Regulations 2022,
- The Health and Safety (First-Aid) Regulations 1981
- The Gas Safety (Installation and Use) (Amendment) Regulations 2018
- Lifting Operations and lifting Equipment Regulations 1998
- The Lifts Regulations 2016
- The Manual Handling Operations Regulations 1992 (as amended)
- The Control of Noise at Work Regulations 2005
- The Personal Protective Equipment at Work (Amendment) Regulations 2022
- The Pressure Systems Safety Regulations 2000
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Management of Health and Safety at Work Regulations 1999,
- The Control of Vibration at Work Regulations 2005
- Workplace, Health, Safety and Welfare Regulations 1992
- The Provision and Use of Work Equipment Regulations 1998
- The Working at Height Regulations 2005
- Building Safety Act 2022
- Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

The above is not exhaustive and does not include Approved Codes of Practice (ACoPs)

Related policies and procedures

Health and Safety Related Policies and Procedures

This Health and Safety Management Policy overarches and is linked to the following procedural documents:

Employer / Employee Related:

- HS-PP-02 Health & Safety Inspections and Audits Procedure
- HS-PP-03 Accident, Incident & Near Miss Reporting & Investigation Procedure
- HS-PP-05 Employee Consultation and Information Procedure
- HS-PP-06 Contractor Management and Construction (Design and Management) Regulations Procedure
- HS-PP-07 Display Screen Equipment Procedure
- HS-PP-08 Driving at Work Procedure
- HS-PP-11 First Aid Provision Procedure
- HS-PP-13 Legal and Other Requirements Procedure
- HS-PP-14 Work Equipment Procedure
- HS-PP-15 Lone Working Procedure
- HS-PP-16 Manual Handling Procedure
- HS-PP-18 Control of Noise Procedure
- HS-PP-19 Personal Protective Equipment Procedure
- HS-PP-20 Risk Assessment Procedure
- HS-PP-23 Control of Hazardous Substances Procedure

- HS-PP-26 Work at Height Procedure
- HS-PP-28 Young People at Work Procedure
- HS-PP-32 Personal Safety Device Procedure

Landlord Related:

- Fire Safety Management Policy and Procedure
- Legionella Management Policy and Procedure
- Asbestos Management Policy and Procedure
- Gas and Heating Management Policy and Procedure
- Electrical Safety Policy and Procedure
- Lifts Policy and Procedure

The above is not exhaustive, is open to change and procedures may overlap in either of the two categories but have been listed in the one most relevant.

Customer engagement

No customer engagement has been undertaken on this policy at the time of review due to the urgent need to approve changes to ensure a valid policy is in place in line with best practice. When reviewed 12 months ago, Customer Advocates advised of minimal grammatical changes that were made. As set out at the start of this policy, when the Executive Team structure is finalised, the policy will reviewed to reflect the changes. At that point, we'll consult with customers if still deemed appropriate by the Executive Team.

Document Revision History (Record of any changes made to the policy)

Version	Date	Details of changes made
1	17/11/2011	Initial Document
2	30/10/2013	Change in Organisational Structure
3	18/09/2015	General Review
4	12/07/2016	Change of Format, Change in Organogram, all previous management sections combined into one document
5	5/07/2017	Change in organogram, change of review frequency, updated list of procedural documents
6	5/07/2018	Change of branding, change of organogram, and wording in statement
7	15/07/2019	Change of organogram, and roles and some of the roles and responsibilities. Chairperson of board added as signatory to Policy Statement.
8	25/06/2020	Change of roles and responsibilities, change of organogram
9	Sept 21	General review
10	May 22	Change of CEO, Policy overarches FLAGEL policies, Introduction of values in the policy. Note: The addition of FLAGEL to this policy followed independent review from Savills

11	25 May 23	Change of organogram, new policy template, review of draft policy by our customer advocates
12	May 24	Change of organogram to reflect Acting Chief Executive Officer and vacancy and interim within Executive Team. Changes in some Roles and Responsibilities

Appendix 1



Health & Safety Policy Statement

This is our statement of intent in relation to the health, safety and welfare of our employees and others who may be affected by our operations. Moat will provide and maintain a healthy and safe working environment for all employees, customers and visitors to our places of work.

We will:

- Comply with the requirements of the Health and Safety at Work etc Act (1974) and all subsequent relevant legislation.
- Strive to prevent occupational accidents and illnesses and create accident-free workplaces and communities by implementing and continuously reviewing and updating our system of health and safety management.
- Provide adequate resources and the correct levels of information, instruction, training and supervision to employees so that they can work competently, effectively and safely at all times.
- Provide and maintain safe plant and equipment and ensure safe handling and use of substances.
- Communicate effectively and consult with all employees on all key matters affecting their health and safety.
- Provide good control of health and safety risks arising from our work activities, including those work activities carried out by contractors and others on our behalf.
- Set, achieve and review health and safety objectives and targets annually which we will never compromise in the pursuit of other objectives.
- Improve our health and safety performance where this falls short and verify current performance by undertaking internal and external audits. Where audits identify areas for improvement, we'll implement smart actions to address these in a timely and cost effective manner.

Review and update this policy and associated documents at regular intervals, or where deemed necessary through change.

A handwritten signature in black ink, appearing to read 'S Nunn'.

Steve Nunn
Acting Chief Executive Officer ,
Signed on behalf of Moat Homes Ltd.
Date: 11 June 2024

A handwritten signature in black ink, appearing to read 'S White'.

Steve White
Chair of Board for Moat Homes Ltd.

Date: 11 June 2024