



Fairoak

Providing the Keys
to Happy Healthy Homes

HEALTH AND SAFETY POLICY 2025

Version 6

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Approved by Board 12/03/25

About Fair oak Housing Association

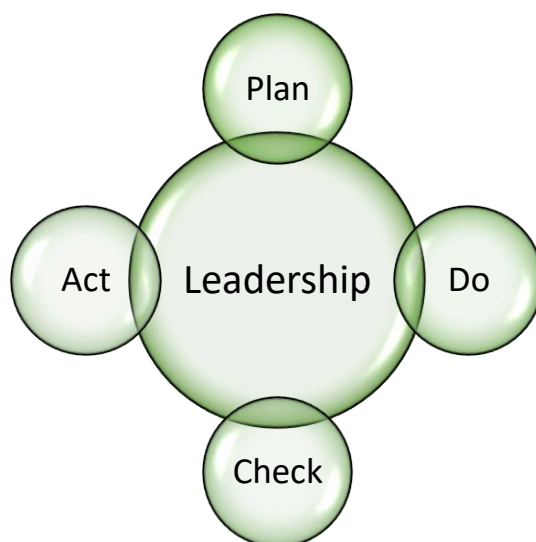
Fairoak Housing Association (FHA) is an organisation that provides a wide range of supported accommodation for people assessed as having learning and other disabilities as well as landlord services for care providers within the same area of specialism. FHA manage approximately 120 residential dwellings across the North of England. Day-to-day delivery of supported living is provided by intense housing support by FHA and registered care and support organisations.

Scope

This H&S Management Arrangements document applies to all FHA's operations, activities, processes, properties, and workplaces. The scope of this policy does not extend to FHA's service providers and contractors.

Our approach to H&S

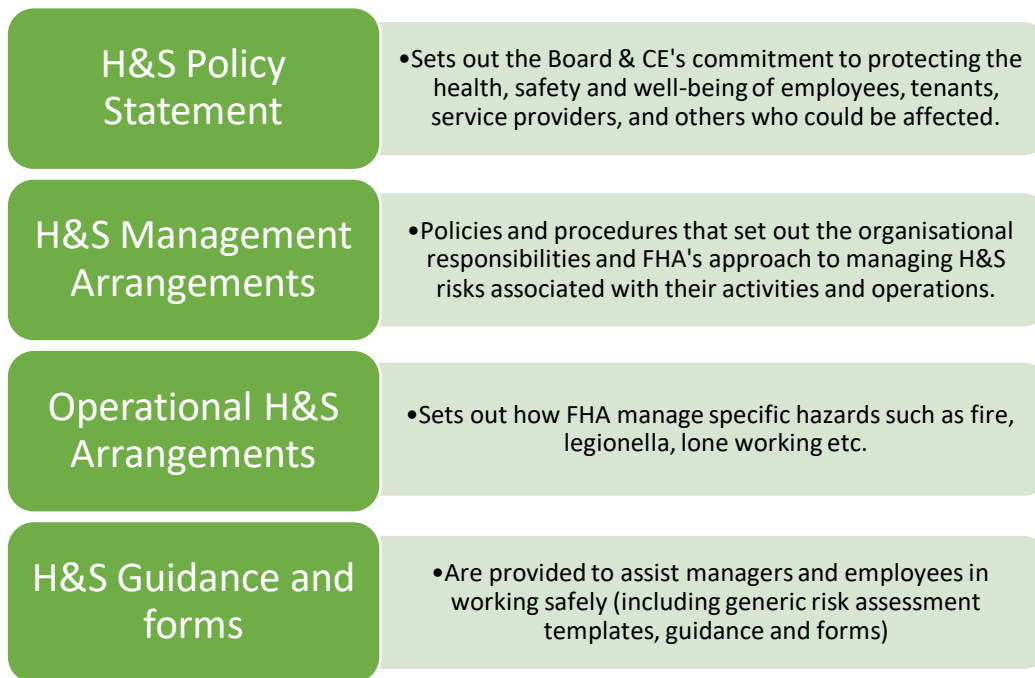
FHA recognises that managing health and safety can rarely be achieved by one-off interventions. Therefore, a H&S management systems (HSMS) approach based upon the Plan, Do, Check, Act approach recommended by the Health & Safety Executive (HSE) has been adopted.



Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 1 of 27

Section 1 Overview of FHA's H&S management system

The key components of FHA's H&S management system are set out below.



H&S Policy Statement

FHA's Health & Safety Policy Statement is a separate document freely available. The policy statement is reviewed and updated annually by the Chief Executive (CE).

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 2 of 27

H&S Management Arrangements

FHA's H&S management arrangements are set out in Section 3 of this policy document and include:

- 3.1 Organisation & Responsibilities for H&S
- 3.2 Identifying Hazards & Assessing Risks (Risk/COSHH Assessments)
- 3.3 Competence & Training
- 3.4 Fire Safety
- 3.5 Non-Smoking
- 3.6 Display Screen Equipment (DSE)
- 3.7 Stress in the workplace
- 3.8 Electricity and Portable Appliances
- 3.9 General Housekeeping
- 3.10 Communication, Participation & Consultation
- 3.11 Managing Change
- 3.12 Incident Response & Emergency Planning
- 3.13 First Aid Arrangements
- 3.14 Incident Reporting & Investigation
- 3.15 Alcohol and Drugs Misuse
- 3.16 Personal Protective Equipment (PPE)
- 3.17 Driving safely for Work
- 3.18 Work Equipment
- 3.19 Manual Handling
- 3.20 Hazard Detection
- 3.21 Violence, aggression and harassment
- 3.22 Lone Workers
- 3.23 Monitoring H&S Performance
- 3.24 Internal Audit
- 3.25 H&S Management Review
- 3.26 Visit by an Enforcement Officer
- 3.27 Policy Review

Operational H&S Arrangements

FHA's operational H&S arrangements are set out in the separate policies and procedures listed below:

- Fire Safety Policy
- Electrical Safety Policy
- Gas Policy
- Asbestos Policy
- Water Hygiene (Legionella Policy)
- Contractor Management Policy
- CDM Management Policy
- Lone Working Policy
- Driving for Work Policy
- Employee H&S Handbook

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 3 of 27

Overview of FHA’s H&SMS approach

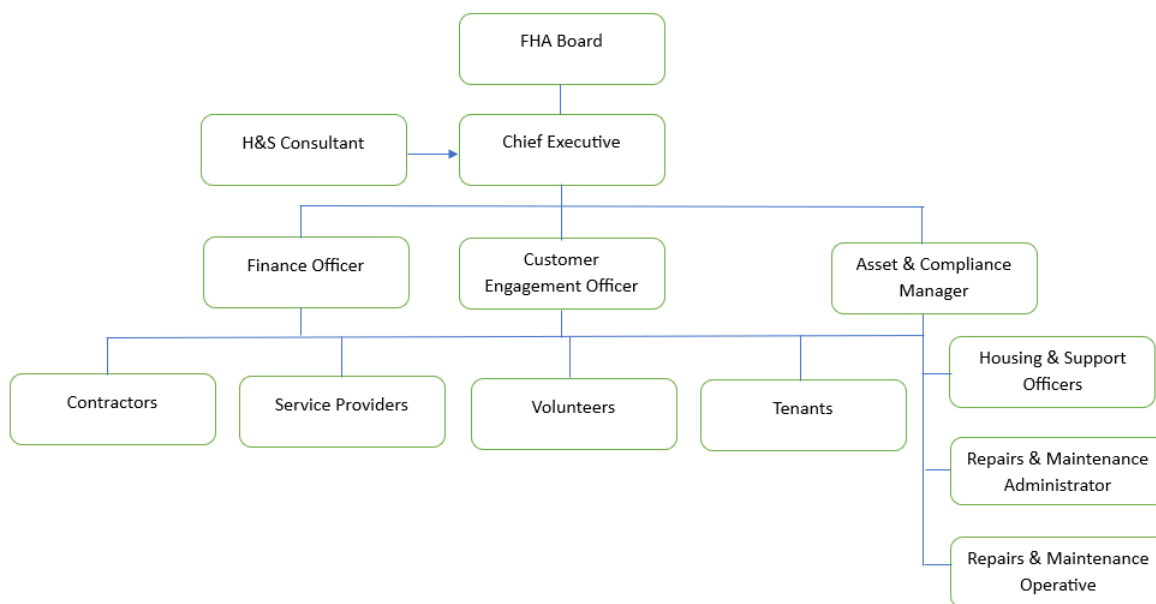
Phase	Key actions and outputs
Plan	<ul style="list-style-type: none"> • Board and CE agree organisational H&S strategy, objectives, performance measures • Board and CE ratify H&S Policy Statement & Responsibilities • Review H&S Risk Register, Register or Legal Requirements, and List of H&S Stakeholders • Confirm H&S related policies and procedures (Management and Operational) to manage risks and ensure compliance with FHA’s legal obligations • Put in place emergency plans (including fire, legionella, infectious diseases)
Do	<ul style="list-style-type: none"> • Assess risks and implement the preventive and protective measures needed and put them in place • Implement H&S related policies and procedures across the business • Board and CE provide adequate resources (financial and human) to deliver services safely, seeking competent advice where needed • Deliver mandatory H&S training and development plans to ensure everyone is competent to carry out their work. • Communicate, consult, and engage with FHA employees, tenants, and other stakeholders on H&S matters
Check	<ul style="list-style-type: none"> • Carry out proactive H&S monitoring (e.g. inspections and audits) • Investigate the causes of accidents, incidents or near misses • Provide regular H&S performance reports to the Board
Act	<ul style="list-style-type: none"> • Learn from accidents and incidents, ill-health data, errors, and relevant experience, including from other organisations. • Revisit plans, policy documents and risk assessments to see if they need updating • Act on lessons learned, including from audit and inspection reports • Asset & Compliance Manager (ACM) conducts annual H&S Management Review - looking back at H&S performance over the past year, and looking forward - identifying new risks, opportunities, and challenges.

Section 2 H&S Management Arrangements

3.1 Organisation & Responsibilities for H&S

This section outlines the organisational structure that FairOak Housing Association has in place to deliver services to our tenants and implement our H&S arrangements across the business. The key responsibilities for each role holder are set out in detail below.

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	4 of 27



Board Members

Overall responsibility and accountability for health and safety sits with the Board. However, strategic, and operational responsibility for H&S is delegated to the CE. The Board is responsible for:

- The health and safety of all employees under the Health & Safety at Work Act 1974 (HSWA), The Management of Health and Safety at Work Regulations 1999 (MHSWR) and other current Health & Safety legislation. This includes the health and safety of volunteers, young persons, visitors and contractors to any of the Housing Association’s premises
- Providing leadership by example in relation to H&S matters
- Ensuring that H&S matters are given the same priority and importance as any other corporate or business objective
- Considering the H&S implications to colleagues and others affected by any decisions made at either a strategic or operational level, reflecting the H&S intentions stated in the H&S Policy.
- Recognising their role in encouraging the active participation of colleagues in improving H&S
- Ensuring that H&S issues are a regular agenda item and that they are kept informed of relevant H&S management issues, as required
- Approving H&S policy statements, reports, and recommendations to ensure compliance.

Chief Executive (CE)

The CE has ultimate responsibility for implementing and resourcing FHA’s H&S policies across the business. In addition to their responsibilities under the HSWA and MHSWR, the CE also fulfils the following statutory functions:

- **‘Responsible Person’** for the purposes of the Regulatory Reform Order (Fire Safety) 2005, Fire Safety Act 2021, and Fire Safety (England) Regulations 2022
- **‘Duty Holder’** for the purposes of the Control of Asbestos Regulations 2012 and Control of Substances Hazardous to Health Regulations 2002/ Approved Code of Practice (ACOP) L8, “Legionnaires’ disease: The control of legionella bacteria in water systems”

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 5 of 27

The Chief Executive will also ensure that:

- Effective policies and procedures are in place to manage H&S risks in FHA and that the H&SMS is maintained
- Reports are provided to the Board on H&S strategy and performance, including matters referred by the Health and Safety Working Group or other Boards/Panels
- Adequate H&S resources, including competent H&S advice, are in place to support FHA's activities
- Leadership by example is provided in relation to safety matters
- Ensure that FHA's employees receive the necessary information, instruction, training, and supervision to carry out their role and responsibilities safely.
- All business decisions reflect the corporate health and safety policies including investment in new plant, premises, work practices or products

- Health and safety performance is reviewed regularly by the Board and that they are kept apprised of safety risk management matters
- Board authority is sought where appropriate, in support of the management of health and safety.
- Health and safety matters are accurately represented and addressed at both Board level and throughout the organisation
- Such resources as may be necessary to fulfil the policies are made available
- Monthly staff meetings are convened where Health & Safety will be a standing agenda topic
- That staff accept responsibility for the effective application and continued development of this policy through periodic risk assessments, building audits and policy reviews
- Actively encourage employees to participate in establishing and adhering to safe working practices

- The Board is informed as to the health and safety performance of FHA on an annual basis against the Association's Health and Safety Policy Statement
- Effective mechanisms are established and maintained to allow the dissemination of information, communication, and consultation on safety issues
- Consult and engage with employees, tenants, support providers, volunteers and contractors on health and safety matters
- Ensure that support providers receive health and safety policies, procedures, and information relating to the FHA premises they work in to disseminate to their employees.

- Tenants are provided with relevant information and support in areas which affect their health and safety
- Ensure that emergency plans are in place.

Asset & Compliance Manager

The Asset & Compliance Manager is responsible for operational management and safety in FHA's premises, including multi-occupied residential buildings, dwellings, and head office. The Asset & Compliance Manager is also responsible for the management and delivery of repairs and maintenance of FHA's premises by service providers and contractors. They must ensure that:

- Suitable and sufficient risk assessments are conducted to ensure hazards are identified and controlled.
- Ensure that employees, support providers, volunteers and contractors are made aware of risk assessments and safe systems of work relevant to their role/involvement
- All new equipment and work processes conform to the current regulatory provisions, standards and Codes of Practice governing health and safety

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	6 of 27

- Contractors working for FHA are vetted and made aware of, and adhere, to corporate health and safety policy, safety rules and procedures.
- First aid needs are assessed to ensure that adequate first aid training and equipment are in place
- FHA's relevant duties under the Regulatory Reform Order (Fire Safety) 2005, Fire Safety Act 2021, and Fire Safety (England) Regulations 2022 are fulfilled as described in FHA's Fire Safety Policy.
- FHA's duties in relation to gas, electrical safety, asbestos and legionella are fulfilled as described in FHA's building safety policies.
- FHA meets its responsibilities under Awaab's law to identify, manage and remedy hazards.
- FHA's duties under the Construction Design & Management (CDM) Regulations, 2015 as outlined in FHA's contractor management and CDM policies.
- Specialist property risk assessments (e.g., fire and legionella) are undertaken or commissioned for FHA's buildings or workplaces as outlined in FHA's building safety policies, procedures, statutory requirements, and codes of practice.
- Any plant, mechanical or electrical systems and equipment (e.g. gas, lifts) under their control are maintained, inspected, checked and repaired in accordance with statutory, company and insurance requirements
- Inspections and checks as defined in FHA's health and safety policies and associated procedures are completed and recorded and that corrective actions are implemented as required
- H&S issues are considered in the design and equipping of offices and communal areas, considering FHA's procedures and requirements, fire evacuation, needs of disabled staff and visitors and legislative requirements.
- FHA has suitable and reliable building safety and compliance monitoring/reporting systems in place.
- Report emerging risks and compliance issues to the CE as soon as possible.
- Ensure that FHA's H&S Statement of Intent is displayed in all premises and is available to employees and other stakeholders online.
- Provide forums and means of engaging with tenants, service providers and contractors on health and safety matters

All other Employees

Employees have a duty to:

- Work safely, efficiently, proactively and without endangering the health and safety of themselves or other work colleagues, volunteers, tenants, members of the public, or others on Association premises or in the course of their work
- Support the CE and Asset & Compliance Manager in implementing and monitoring the effectiveness of FHA H&S arrangements
- Adhere to the Association's safe working practices and comply with advice and instructions given by those with responsibility for health and safety and as set out in the Association's Health & Safety Policies available on the intranet
- Report all accidents, incidents, near misses, unsafe or hazardous conditions to ACM or CE
- Wear safety and protective clothing, use protective equipment and appropriate safety devices as required, and where these are provided for use at work
- Not to intentionally or recklessly interfere or misuse anything provided in the interests of health and safety
- Attend all Health & Safety training courses provided by FHA and utilise said training

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 7 of 27

- Make themselves aware of and seek to work in accordance with the health and safety guidance for their job and their workplace in the Employees' Handbook
- Assist with the risk assessments relevant to their job and work in accordance with them

External Specialist Support in Health and Safety (H&S Consultant)

FHA has appointed an external health and safety consultant to support with the discharge of its statutory health and safety responsibilities including:

- Keeping the Register of Legal Requirements updated to ensure ongoing compliance with relevant duties
- Ensuring that all safety rules, regulations and procedures are kept under review
- Putting in place systems and arrangements for reporting and investigating health and safety accidents, incidents and near misses to learn lessons and prevent reoccurrence

Temporary employees including volunteers, consultants and agency workers

It is FHA's policy that all employees should be treated on an equal footing for health and safety, whether they are working full-time, part-time or volunteers. This also applies to temporary employees and consultants. Employees must ensure that temporary employees, volunteers, and consultants are given the support and information they need to comply with this policy and that they are considered in the risk assessment for their area of responsibility.

All temporary employees, volunteers and consultants must be informed through the induction process, of the emergency arrangements in place at their location and of any arrangements to deal with specific risks, and precautions to be applied, in relation to the work they are to do.

3.2 Identifying Hazards & Assessing Risks (Risk & COSHH Assessments)

Under Regulation 3 (Management of Health and Safety Regulations) requires all employers to conduct a suitable and sufficient risk assessment to identify workplace hazards and those who might be affected by them and calculate the degree of risk they present in order to put in place the measures they need to take to protect people.

Every employer shall ensure that the exposure of their employees to substances hazardous to health is either prevented or, where this is not reasonably practicable, adequately controlled.

Under the Control of Substances Hazardous to Health Regulations (COSHH Regulations), COSHH assessments are required by law, for any substances that are hazardous to health. So, the use (or production) of any substances hazardous to health (including liquids, dust, fumes etc.) requires assessment under the regulations.

FHA recognise that identifying hazards and assessing risks are fundamental to any H&S management systems. This section outlines FHA's approach to identifying hazards, assessing, and controlling risks that may affect the health, safety and well-being of employees, contractors, volunteers, tenants, visitors, and anyone else who may be affected.

It is important that all employees participate in the risk assessment. They know the problems and the details of what really happens when they perform their tasks or activities, so they should be involved in the assessment. Their practical knowledge or competence is also often needed to develop workable preventive measures.

Employees also have a legal obligation to report any known or identified workplace hazards to their employer. This allows for a workplace risk assessment to be carried out and appropriate control

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 8 of 27

measures to be introduced to either eliminate the hazard, or assist in managing the risk to a suitable level.

Definitions

- **Hazard** - Is a source, situation, or act with a potential for harm in terms of human injury or ill health, or a combination of these.
- **Risk** - Is a combination of the likelihood of an occurrence of a hazardous event or exposure and the severity of injury or ill health that can be caused by the event or exposure.

Operational risk assessments

All employees are trained in carrying out risk assessments, where a workplace hazard has been identified. The employee, where competent to do so, is responsible to ensure reasonably practicable control measures are put in place and recorded, to eliminate or safely manage the hazard and risk.

The Management of Health and Safety at Work Regulations 1999 states that *“an employer must take reasonable steps for the effective planning, organisation, control, monitoring and review of the preventive and protective measures..”* So even if the task of risk management is delegated, it is ultimately the responsibility of the management within any business to ensure it is effectively completed.

The CE and ACM are responsible for ensuring appropriate operational risk assessments are completed by a competent person, they are up to date and are communicated to the relevant employees, and their effectiveness is monitored.

More technical risk assessments may be carried out by an external health and safety consultant, on behalf of the business/organisation.

FHA has adopted the Health & Safety Executive’s (HSE) 5 steps to risk assessment:

- Step 1: Identify the hazards
- Step 2: Decide who might be harmed and how
- Step 3: Evaluate the risks and decide on precautions
- Step 4: Record your findings and implement them
- Step 5: Review your risk assessment and update if necessary

Control measures identified in the risk assessment must be implemented. This might include instructing employees as to what they need to do to keep themselves safe at work, purchasing any new equipment, and delivering any training required.

It is the employee’s responsibility to co-operate with management arrangements in respect of workplace risk assessments, and comply with any control measures laid down within them.

The ACM or external H&S consultant will periodically check that control measures are being implemented and are controlling risk as intended.

Review (monitoring)

The effectiveness and application of risk assessments and associated controls must be reviewed at least once a year to determine:

- Whether the significance of the hazard is still relevant
- Whether the controls in place are still effective

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	9 of 27

Or

- When the control measure is not working (e.g. following an incident or a 'near-miss' experience)
- When working practices have changed.
- When new equipment, materials or work processes are introduced.
- Change in law or industry guidance/best practice.

It is the responsibility of the appointed external health and safety consultant to ensure that all reviewed or amended risk assessments are appropriately circulated to all employees, in relation to their tasks.

3.3 Competence & Training

FHA will ensure that all employees, volunteers and contractors have the necessary health and safety competence, training, and awareness to carry out their duties and ensure the successful implementation of the H&S policies and arrangements.

General Requirements

FHA will take a planned approach to identifying and delivering competence throughout the organisation in relation to H&S. This approach will address training needs, raising awareness, and monitoring the result of training to ensure that competence is the outcome.

FHA's approach to H&S competence and training



Induction

FHA will ensure that employees will receive essential Health and Safety training, as part of their induction when commencing work for FHA, or occupational training as part of their ongoing development.

Identifying Training Needs

At least once a year the CE and ACM, supported by the H&S Consultant, will ensure that an H&S Training Needs Analysis (TNA) has been completed for each employee/job role as they relate to H&S. This will be achieved using existing methods of performance review such as annual appraisals, professional development reviews, reviews of job descriptions and monthly one-to-ones.

Plan & Implement Training Delivery

Planning training delivery is essential for compliance and ensuring effective results. The CE and ACM will:

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 10 of 27

- Develop a plan to deliver H&S training as per the H&S TNA.
- Ensure that suitable H&S training provision is made available to all employee (e.g. external courses, in-house training delivery and e-learning).
- Put in place a training record and delegate feedback system.
- Monitor delivery of the H&S training plan to ensure that the required training is provided.

Refresher training should be carried out annually, at suitable intervals in relation to the course subject, or as set by any professional occupational body or examination board.

Evaluate the effectiveness of H&S training

The CE and ACM will ensure that systems and processes are in place to evaluate the effectiveness of health and safety training and competence activities. These will include:

- Confirming the knowledge of delegates during health and safety training and competence activities (e.g. written and verbal tests and assessments)
- Confirming the competence of delegates by confirming that they can do their job safely through observation in their workplace or the training environment.
- Feedback from delegates, managers, and trainers in relation to H&S training.
- Evaluating and measuring the effectiveness of the H&S training programme across the FHA (e.g. fewer accidents and injuries, reduced H&S non-conformities, increased productivity, enhanced well-being, and good staff retention)

The ACM will manage the provision of day-to-day training and ensure that the provision is discussion based, and employees have opportunities to ask questions, raise queries and request additional information.

Employee Suitability

The Organisation will recruit suitably qualified employees with the qualifications and experience to meet the Job Profile for the role. Where there is a shortfall in competence, the ACM will identify this as a training need and agree a plan with the CE to close the competence gap.

Service Provider & Contractor Competence

Service Provider and Contractor competence is vitally important, and FHA is committed to employing competent contractors with respect to safety. Wherever possible, FHA will engage with contractors and offer training opportunities to them.

Support from FHA's H&S Consultant

When requested FHA's external H&S Consultant will advise the CE and ACM on appropriate H&S competence and training. Advice provided could include:

- Advising on appropriate content or training courses likely to provide the desired competence level.
- Engaging with training reviews
- Assisting with risk information and supporting manager-led training.
- Providing training solutions themselves (face to face, video or eLearning)

3.4 Fire Safety

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 11 of 27

The CE and ACM have the responsibility to ensure that all new staff are given a Fire Safety induction briefing, on their first day with the organisation, and that they are made aware of the designated fire assembly point for the office.

The organisation will ensure that individual Fire Risk Assessments (FRA) are carried out on properties owned and managed by the organisation. These are to be reviewed annually by a competent person or qualified fire risk assessor.

It is the responsibility of the ACM to ensure that all firefighting extinguishers in non-and domestic premises are annually serviced and maintained, by engaging the services of an accredited fire servicing company.

Further management arrangements for fire safety are set out in the organisation's fire safety policy.

3.5 Smoking in the workplace

The organisation will comply with its statutory obligations in respect to a non-smoking workplace.

A working environment (workplace) is defined as a place or location where an employee performs tasks, jobs and projects for their employer.

Smoking, including vapes and e-cigarettes is prohibited in all workplaces in the UK. Legally, an employer does not need to provide a designated smoking area for smokers and may request smoking to take place at a certain distance away from the work premises. In the UK, the smoking ban applies to any vehicle used for work purposes (this applies to privately owned vehicles if used by an employee for business purposes).

3.6 Display Screen Equipment (DSE Assessments)

FHA is committed to reducing risks using suitable Display Screen Equipment, lighting, furniture and by ensuring the general working environment is free from hazards.

The Display Screen Equipment Regulations 1992 apply to workers dependent on DSE devices to work, whether they are based in the office, working from home, remote working, working offsite or using tablets for carrying out work tasks. The regulations also apply to workers who rely on mobile phones or other mobile devices for their work.

Employees must report to the employer if they are suffering aches, pains, headaches or any other symptoms, which may be attributable to their use of Display Screen Equipment at work.

DSE users will be asked to complete a DSE self-assessment annually with the aim of protecting workers from the health risks associated with DSE.

3.7 Stress at work

The Health and Safety Executive has defined stress as 'the adverse reaction a person has to excessive pressure or other types of demand placed upon them'.

Work-related stress can be tackled by the organisation and its employees working together to identify sources of stress and how those can be managed.

- Carry out a risk assessment in conjunction with employees to identify sources of stress and the associated risks and gather information, such as completed health questionnaires, sickness absence records and exit interview notes to assist in this process.
- Take steps to reduce the risks from work-related stress, as far as is reasonably practicable.

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 12 of 27

- Put in place a system so that employees can raise, with their line manager, a health and safety representative or colleague, if they are experiencing work related stress or have any concerns about their work environment or instances of unacceptable behaviour.

3.8 Electricity and Portable Appliances

This aims to set out the organisation’s commitment to managing the risks of electricity to a high standard and ensuring that the organisation is fully compliant with the relevant Electrical Safety legislation across the UK. It is FHA policy that in all FHA owned or managed locations where a duty of care exists, as far as is reasonably practicable:

- Ensure that electrical installations and equipment are installed in accordance with the IEE (Institute of Electrical Engineers) Wiring Regulations (BS7671)
- All fixed electrical installations are installed and maintained in a safe condition in each premise for which FHA has control of.
- All portable electrical appliances are supplied and maintained in a safe condition.
- All persons responsible for checking, inspecting and testing electrical equipment and installations are competent.
- All persons who use electrical appliances can do so safely without risk of harm from electricity.
- All portable appliances are annually tested (PAT) and that employees should not bring in their own electrical items unless authorised by management
- Any item that is NOT brought in that is new and boxed should be tested before use
- That there will be sufficient resources available to control all risks from electricity .

Where a problem arises related to electricity at work employees must inform their line manager immediately and the organisation will then take the necessary measures to investigate and remedy the situation.

Portable Appliances Testing (PAT)

New equipment should be supplied in a safe condition and not require a formal portable appliance inspection or test. However, a simple visual check is recommended to verify the item is not damaged.

The law requires the employer to ensure that their electrical equipment is maintained to prevent danger.

FHA will adopt a schedule for portable appliance testing of all portable appliances/equipment (this is to include power cables for laptops are supplied to the employee for work purposes (if applicable)).

3.9 Housekeeping

Poor standards of housekeeping are a common cause of injury and damage at work and can create possible fire hazards. Unsatisfactory housekeeping is often the result of poor working practices, lack of direct supervision and/or organisational deficiencies within the workplace.

The ACM will carry out a risk assessment in relation to housekeeping within the office and introduce control measures as appropriate. They will take any necessary measures to remedy any risks found because of the assessment.

The ACM will implement steps for the routine maintenance, cleaning and repair of the premises and make employees / subcontractors aware of their responsibilities for ensuring that hazards are not created from their work or equipment.

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	13 of 27

The ACM will re-assess housekeeping as necessary if work processes change.

3.10 Communication, Participation & Consultation

This section sets out how FHA ensures effective communication, participation, and consultation on matters of health and safety.

Identification of interested parties

The ACM will ensure that interested parties are identified during the annual H&S Management review process and consider their needs and expectations.

Communication

Communication is a vital part of FHA's H&S policies and arrangements. It is essential that all methods and forums of communication are maintained, and that good quality information is disseminated throughout the organisation.

Information input

The CE & ACM, with the support of the H&S Consultant, will ensure that appropriate systems are in place to ensure that good quality H&S information is identified and kept up to date. Sources of H&S information include:

- Register of Legal Requirements
- Competent person for health and safety
- Links with industry bodies and similar organisations.

Information flow

In order for the H&S policy to be effectively implemented, and for the management of H&S to continually be improved, key information must be effectively communicated. H&S information will be provided in formats that are accessible and usable by all employees.

Information output

To ensure that FHA does not pass hazards onto other organisations and to comply with statutory duties, information must also be communicated to external organisations. This will primarily encompass:

- Enforcing authorities and regulators
- Tenants
- Service Providers and Contractors

The information will include matters such as:

- Providing accident and ill health information to the Health & Safety Executive (HSE) as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
- Providing relevant hazard information to residents, visitors, and contractors
- Emergency planning information

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 14 of 27

Participation and Consultation

FHA employees have a right and a responsibility to participate in ensuring their own health and safety and that of others around them. Employees have an important role to play in helping FHA to:

- Identify hazards, assessing risks and taking action to control hazards and risks
- Identifying competence requirements, training needs and evaluating training
- Establish what information should be communicated and how
- Investigate incidents and non-conformities and become involved in implementing corrective actions
- Identify the needs and expectations of interested parties
- Establish H&S policy and objectives
- Assign organisational roles, responsibilities, accountabilities & authorities

The CE & ACM will ensure that there are sufficient opportunities and robust method by which employees can engage. These opportunities include:

- Including H&S on the agenda of staff meetings and briefings
- Providing opportunities to comment and discuss during H&S training sessions
- Involvement in conducting risk assessments and an opportunity to comment on the findings of risk assessments
- Opportunities to be involved in accident and incident investigations and to comment on investigation reports.

Anyone who engages or provides comment will be given feedback by the CE or ACM.

Tenants and other interested parties

FHA commonly work in tenants' homes and will communicate and cooperate with them to implement safe working procedures and provide information about the relevant risk control measures needed.

3.11 Managing Change

This section outlines FHA's approach to minimise the risks and hazards arising from change. This section applies to all planned changes that influence health and safety risk and performance such as:

- Organisational structures, mergers, and redundancies
- Technology, plant, and equipment
- New products, processes, or services
- Changes to applicable legal and other requirements
- Changes in knowledge or information concerning hazards and risks
- Developments in knowledge and technology
- Facilities and workplaces
- Work practices and procedures
- Design specifications and raw materials
- Workforce and workers

Procedure

Depending on the nature of any anticipated change, the CE will adopt a suitable methodology for assessing the risks and the opportunities that might arise because of the change.

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 15 of 27

If FHA, Board or CE, decide to implement the change, they will ensure that all affected employees are properly informed and are competent to cope with the change.

3.12 Incident Response & Emergency Planning

FHA will ensure that plans are established to minimise the risk to H&S arising from emergencies or other incidents.

Identifying potential H&S incidents and emergencies

The ACM will identify potential H&S incidents and emergencies through FHA's risk and hazard identification and assessment process, including:

- Fire risk assessments
- COSHH assessments
- First aid needs assessments
- Asbestos risk assessments
- Water (legionella) risk assessments
- Construction phase plans

Planning for incidents and emergencies

Activity and site-specific health and safety incident procedures and emergency plans will be written and implemented as required. This will ensure that the emergency response is appropriate to that site and the nature and scale of the potential event.

Testing emergency plans

The ACM will conduct tests of the emergency plans at procedures at regular intervals. Testing may include evacuation drills and desktop exercises.

Emergency equipment

The ACM will ensure that suitable equipment and/or materials to manage risks are provided and maintained, where required by the emergency plans.

Taking corrective and preventative action

Following an incident, test or audit the ACM will review the findings and lessons learned and take corrective action to prevent recurrence or take preventive action to continuously improve H&S.

The corrective and preventative actions undertaken shall be appropriate to the size of the problem and the potential or actual H&S risk.

A record of corrective or preventative action taken will be made in the incident/test/audit report and the reflected in the relevant emergency plans, procedures, risk assessments and method statement.

3.13 First Aid & medical attention

Sufficient numbers of trained persons and equipment to deal with accidents and injuries will be provided by FHA.

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 16 of 27

To this end, FHA will provide information and arrange training on First Aid to employees to ensure that statutory requirements and the needs of the organisation are met.

First Aid requirements will be identified through the risk assessment process to ensure the adequacy and appropriateness of First Aid personnel, equipment and facilities. FHA will ensure that sufficient numbers of First Aid personnel and equipment to deal with accidents and injuries will be provided at our offices (at least 1 First Aider per 50 employees).

Where the number of staff employed is less than 50 or the risk is low, a “trained Emergency First Aider” (formerly known as the Appointed Person) may be nominated to take charge of the situation in the absence of a First Aider.

It should be noted that the Health & Safety (First Aid) Regulations 1981 place a legal responsibility on employers to provide First Aid for their employees. Additionally, it should also be ensured that our offices are equipped to meet the First Aid requirements of persons other than employees, e.g. tenants/visitors/contractors.

In all cases a sufficient number of First Aiders or emergency First Aiders should be designated, considering annual leave and sickness absence etc. All First Aiders and emergency First Aiders will be appropriately trained by an accredited organisation.

3.14 Incident Reporting & Investigation

FHA recognises its responsibilities as an employer and as a social housing provider in relation to incident reporting. This includes recording, investigating, and taking appropriate measures to prevent future occurrences. This section outlines FHA’s incident reporting and investigation procedure.

General Requirements

FHA will maintain an appropriate reporting and recording system for all accidents, incidents, near-misses and non-conformances to ensure that this standard can be implemented. FHA will investigate and analyse H&S incidents to:

- Determine any underlying shortfalls within the management system, operational procedures and processes, risk assessment or any other factor.
- Identify the need for corrective action
- Identify opportunities to prevent other incidents
- Identify opportunities to continually improve safety management
- Communicate shortfalls with colleagues, contractors, and other interested parties so that everyone can learn from mistakes

The results of incident investigation will be documented and retained for future use.

Reporting an Incident

All incidents, accidents, near-misses and dangerous occurrences are to be reported using FHA’s online incident form.

All incidents should be reported to the CE or ACM on the same day of the incident, this should then be recorded on the online form within 48 hours of the incident being reported.

Every employee has a legal obligation to report all workplace incidents, accidents, near-misses and dangerous occurrences to the CE, ACM, or the appointed external health and safety consultant.

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	17 of 27

Investigating an Incident

The purpose of an incident investigation is to determine the root cause of the incident and where possible, to prevent a reoccurrence.

Who investigates an incident will depend on the seriousness of the incident itself, the degree to which technical knowledge is required and the severity of the outcome (see page 19).

Minor accidents and incidents can be dealt with informally although they should all be reported and recorded in a first aid book (paper or online). Simple cuts, bruises or insignificant injuries will not require investigation unless they appear to be part of a trend of injury or unsafe working practices. An immediate investigation - usually completed by the ACM – will be sufficient.

More serious accidents and incidents may or may not trigger a formal investigation. The ACM or FHA's appointed external health and safety consultant is responsible for making this judgement. If the causes are apparent and it is clearly an isolated incident, a brief investigation may be enough.

Major accidents and incidents and those reportable under RIDDOR should always trigger a formal investigation.

It is the responsibility of the external health and safety consultant to ensure that all relevant risk assessments, COSHH assessments (if applicable) and method statements are reviewed following any accident, incident, near-miss or dangerous occurrence.

The CE, ACM or FHA's appointed external health and safety consultant are responsible for defining the depth of the investigation.

All RIDDOR incidents are to be reported to the organisation's external health and safety consultant, who will then be responsible for reporting the incident to the HSE via its online portal. They will also be responsible for carrying out the necessary RIDDOR investigation and subsequent report.

The investigating officer will involve employees and employee representatives in the investigation wherever appropriate. The injured person, along with any witnesses, should cooperate with any investigation.

The investigation should be thorough and structured to avoid bias and leaping to conclusions. No assumptions should be made or solutions sought before the investigation is completed. A good investigation involves a systematic and structured approach.

- Information gathering
- Analysis of the evidence
- Risk control measures
- Action plan and implementation

Reportable Incidents (RIDDOR)

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) requires employers, the self-employed and people in control of work premises (the Responsible Person) to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences (near-misses). These incidents fall into four broad categories:

- The death of any person.
- Specified, reportable injuries to workers (as outlined by HSE).
- Over-7-day incapacitation of a worker following a workplace incident
- Non-fatal accidents to people other than workers
- Occupational diseases (includes COVID)

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 18 of 27

- Dangerous occurrence (as outlined by HSE)
- Gas incidents

Further information about reportable incidents can be found on the [HSE's website](#).

If in doubt, advice should be sought from the health and safety consultant.

The decision to investigate

The type and depth of Accident/Incident Investigation completed will depend upon the severity, or potential severity, of the incident.

The table below will assist the organisation in determining the level of investigation which is appropriate for the adverse event. The organisation must consider the worst potential consequences of the adverse event (e.g. a scaffold collapse may not have caused any injuries, but had the potential to cause major or fatal injuries).

Likelihood of recurrence	Potential worst consequence of adverse event			
	Minor	Serious	Major	Fatal
Certain				
Likely				
Possible				
Unlikely				
Rare				

(The definitions of 'consequence' and 'likelihood' are set out in the section on 'Understanding the language of investigation')

Risk Level		Minimal		Low		Medium		High
Investigation Level		Minimal Level		Low Level		Medium Level		High Level

Table Reference HSE HSG245

Further information for investigation accidents and incidents can be found at [HSE HSG245](#)

3.15 Alcohol and Drugs Misuse

Employees should not report or endeavour to report for work having consumed alcohol or being under the influence of drugs or alcohol.

Drugs properly prescribed by a general practitioner for medical treatment are permitted, provided such use does not adversely affect the person's ability to carry out the work for which he/she is employed in a healthy and safe manner.

Employees should advise the CE or ACM if they have any medical condition or are taking medication that could affect their work and the health and safety of either themselves or others. Failure to comply with this requirement may result in immediate removal of the subject person from the premises, as well as formal disciplinary action.

3.16 PPE

FHA seeks, so far as reasonably practicable, to ensure the adequate control of risks by means other than through the provision of PPE and clothing; however, the nature of some tasks means that the use

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 19 of 27

of such protection is required in a variety of circumstances. Some activities currently carried out by FHA employees require the provision of PPE. Therefore, employees will be provided free of charge with relevant PPE and clothing. Employees will subsequently be instructed in the correct usage through relevant risk assessments and as necessary, in correct storage and maintenance.

The employee is responsible for taking care of the PPE that has been issued. If any PPE is damaged, the employer should be informed immediately.

3.17 Driving Safely for Work

FHA will ensure that:

- Risk assessments are carried out for all work-related driving activities and appropriate control measures are implemented and communicated to employees.
- Drivers are competent to drive, hold a valid driving licence, are suitably insured, are familiar with the vehicle, understand the risk assessment findings and control measures and have received appropriate training, as necessary journeys are planned.
- Drivers are instructed on the need to carry out basic vehicle safety checks and instructed on what to do in the event of an emergency or breakdown.
- Vehicles are fit for the task and regularly maintained in a roadworthy condition.
- Privately owned vehicles will not be used for work purposes, unless insured for business use and have a MOT certificate, where required.
- Company vehicles carry suitable equipment, based on risk assessment, to aid in an emergency, breakdown or bad weather conditions.
- Equipment may include First Aid kits, mobile phones, de-icing equipment, personal protective equipment (PPE), etc.
- Any persons, equipment, chemicals or medicines carried in the vehicle are properly secured and follow, where relevant, the manufacturer’s recommendations.
- Only authorised (in car) handsfree devices are to be used – at no time should mobile phone calls be made while driving, or while stationary at traffic lights or junctions.
- Where possible, the driver is to pull over and park to either take or make a phone call.
- It is unlawful to use or activate a mobile device (phone) while the vehicle is moving, or stationary on the public highway (e.g. at traffic lights or a junction).
- Employees have the responsibility to notify FHA if they have any medical condition that may impair their ability to drive temporarily or permanently (including surgery or visual impairments).
- Smoking, vaping and the use of e-cigarettes is strictly prohibited in all company or lease vehicles, as well as privately owned vehicles used for work purposes.
- Company vehicles are fitted with GPS tracking devices.

Employees are to be provided with and read the additional guidance in the current Driving for Work policy. If they are classed as a Lone Worker, they are also to read the current Lone Working policy.

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	20 of 27

3.18 Work Equipment

It is the responsibility of FHA to ensure that all equipment supplied to its employees is in a safe condition and is suitable for the work task it provided for.

FHA has a statutory requirement to ensure any equipment which requires routine servicing, is serviced as part of a programme of maintenance and that all relevant logbooks or maintenance records are updated and made readily available for inspection purposes.

It is the responsibility of the employee (operator) to carry out the necessary equipment safety checks, outlined in any task appropriate risk assessment and manufacturers guidance. The employee (operator) has the responsibility to inform the ACM of any equipment defect that may prevent them using the equipment in a safe manner, or that may cause the employee (operator) harm if the equipment is used.

All non-supplied work equipment (e.g. tools) is to be approved for use by the ACM – all electrical equipment is to be included as part of the organisation's PAT programme - this includes power cables for laptops which are supplied to the employee for work purposes (if applicable).

3.19 Manual Handling & Lifting

Manual handling operations undertaken by our employees are subject to assessment under the Manual Handling Operations Regulations and in conjunction with the HSE's Manual Handling at Work Guidance INDG143 (rev4).

Employees who are required to carry out manual handling and lifting operations as a regular part of their work are given basic training in correct lifting and handling techniques. This training must be renewed every three years. The ACM/appointed responsible person is responsible for ensuring that all employees requiring this training attend the training course at the appropriate time.

All employees suffering from an acute injury or long-term ill health condition likely to be aggravated by manual handling or lifting, must report this condition immediately to the employer/appointed responsible person.

Where lifting equipment is to be used, evidence of testing and inspection will be obtained by the ACM before the equipment is put into use.

The lifting equipment selected must be appropriate for the planned lifting operation and used in conjunction with suitable slings, chains, etc. Only personnel who are trained and authorised will act as banksmen/slingers for lifting operations.

3.20 Hazard Detection

The Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations both state that employers and employees have a legal duty to inform persons of hazards within the workplace.

FHA informs employees by means of risk assessments, instruction, supervision, training and documentation.

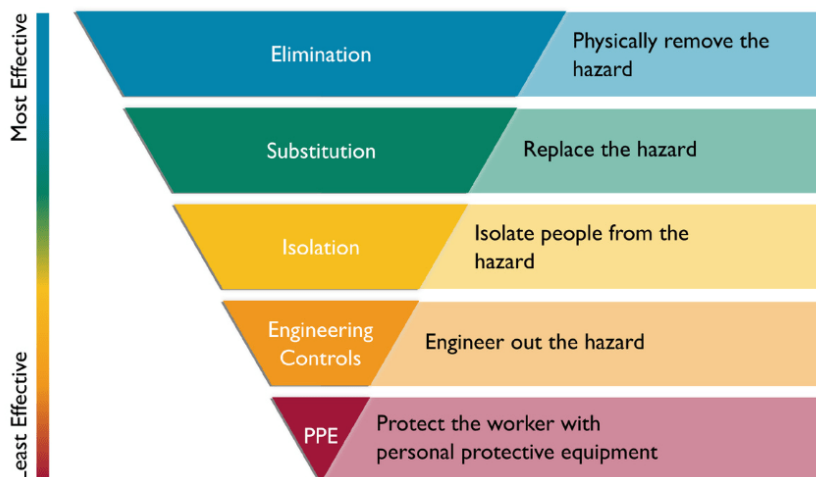
The employees inform the CE or ACM by means of verbal and written communication.

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 21 of 27

To encourage safety awareness in the workplace, a hazard reporting system is provided to ensure that all members of the workforce have a means of reporting hazards that may be present in their place of work.

When a hazard has been identified, it must be reported immediately to the ACM or appointed health and safety representative for the business. This is so the appropriate risk assessment can be carried out and the hazard managed in accordance with the hierarchy of controls.

Hierarchy of Controls



Near-misses are accidents that nearly happened, e.g. trailing cables or faulty equipment. These need to be reported when they happen so that action can be taken to put them right.

When a near-miss has been identified it must be reported immediately to the CE or ACM.

3.21 Violence, Aggression and Harassment

FHA employees have the right to work in a safe working environment, free from the threat of harm from forms of violence, aggressive behaviour or harassment.

FHA recognises the difficulties in managing violence, aggression and harassment at work and aims to put in place steps to identify and minimise risks to support employees and monitor incidents to help address any potential problems.

The Health and Safety Executive’s definition of work-related violence is any incident in which a person is abused, threatened or assaulted in circumstances relating to their work. Employees whose job requires them to deal with the public can be at risk from violence, therefore, appropriate risk assessments and control measures need to be put in place, where any risk of potential violence is identified.

All employees are to report all incidents of violence, aggression and harassment to the CE and ACM.

3.22 Lone Workers

The Health and Safety Executive (HSE) defines lone working as: “those who work by themselves without close or direct supervision”.

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	22 of 27

Examples include: a person working on their own in a workshop, home workers, persons working in an office on their own, persons working outside normal hours on their own and mobile or peripatetic workers.

Where required, all lone workers are to ensure they have read and understood the control measures as outlined in any relevant task specific or generic lone worker risk assessment and FHA’s Lone Worker policy.

3.23 Monitoring H&S Performance

FHA will monitor and measure H&S performance to ensure that H&S risks are managed, that H&S arrangements are working as intended, and identify areas for improvement.

Types of monitoring

There are many different types of monitoring, but they can generally be categorised as either ‘active’ or ‘reactive’:

Active methods monitor the design, development, installation, and operation of management arrangements. These tend to be preventive in nature, for example:

- Inspections of work areas, plant, and equipment
- Health surveillance to prevent harm to health

Reactive methods monitor evidence of poor health and safety practice but can also identify better practices that may be transferred to other parts of a business, for example:

- Reporting and investigating accidents and incidents
- Cases of ill health and sickness absence records

Active Monitoring

There are several types of active monitoring and data that FHA can use to assess and monitor H&S performance, such as:

- H&S checks, inspections, and observations
- Audit and review activity
- Training records/data
- Risk assessments completed/reviewed

Reactive Monitoring

There are several forms of reactive monitoring and data that FHA can use to assess and monitor H&S performance, such as:

- Incident, sickness, and health data
- Enforcement action and complaints

Monitoring Performance

At Board meetings and during the H&S Management Review, the ACM will report on incident trends and any significant reportable incidents that may have any financial impact on the business (e.g. EL claims or business improvements to prevent a reoccurrence), as well as other identifiable H&S issues that the Board should be made aware of.

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	23 of 27

Key indicators would be identified by incident reporting analysis, training needs analysis and from the periodic review meetings with FHA's external health and safety consultant, or from other external safety reports e.g. Fire Risk Assessments.

3.24 Internal H&S Audit

Internal Audits are a method of determining whether the H&S policies and arrangements are being effectively implemented and controlling risks as intended.

FHA will conduct internal audits of the H&S policies and arrangements, including planning, selecting an internal auditor, carrying out individual audits, and reporting the findings.

Internal Review and Auditing

There is a legal requirement to monitor and review health and safety arrangements.

This enables organisations to assess how effectively risks are controlled to implement improvements, where required, and to develop a positive health and safety culture and safe working environment. The frequency of monitoring and review will be determined by the level of risks, competence of people, legal requirements, results of accidents and recommendations by manufacturers or suppliers of equipment.

The frequency of monitoring and review will be decided by the level of risks, competence of people, legal requirements, results of accidents and recommendations by manufacturers or suppliers of equipment.

Monitoring should include:

- Checking compliance in following the health and safety policy, control measures stated in risk assessments and safe systems of work.
- Inspecting the safety of workplace equipment (where applicable)
- Inspecting workplace locations and activities
- Training analysis and competence of employees.

Its recommended that all businesses review (audit) their statutory health and safety management arrangements at least on an annual basis, to ensure that they are appropriate and are compliant with current legislation requirements.

The employer's responsibilities are to:

- With the assistance of its external health and safety consultant, routinely monitor and review health and safety arrangements.
- Arrange, with its external health and safety consultant, an annual inspection of all applicable workplaces, associated with the business.
- Monitor employees' health requirements and fitness to work, where applicable, e.g. eye tests, effects of noise and vibration, general fitness, DSE requirements etc., as required by risk assessments or method statement.
- Ensure competent persons regularly inspect, examine and test equipment, where applicable, following the manufacturer's recommendations and at intervals, where set by statutory requirements.
- Regularly inspect the workplace and activities to ensure a safe working environment.

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	24 of 27

- Regularly check employee and contractor competence during work activities to ensure they are working safely and are following the requirements of the employee handbooks, instructions, etc.
- Ensure all risk assessments are reviewed by a competent person at least annually, or where there has been a significant change in tasks, premises layout, equipment or personnel.
- The management, along with the external health and safety, should continually analyse data about injuries and incidents with the potential to cause injury and ill health, as well as all reportable incidents (RIDDOR's). This data should provide information and insight about health and safety failures and provide the opportunity to review current processes, management arrangements and risk assessments, thereby preventing a recurrence.
- Take any necessary remedial actions to safeguard the health and safety of employees, contractors, public or visitors where hazards, faults, omissions, non-compliances, lack of training, unsafe activities or conditions are found through complaints, inspection, monitoring and review
- Prioritise when, how and who implements any actions required from any health and safety review, audit or workplace inspection.
- Periodically review the whole of the health and safety management system including the elements of planning, organisation, control and monitoring to ensure that the whole system remains effective and legally compliant.

The review can be undertaken by the business itself, via an internal review, led by the appointed external health and safety consultant, supported by the internal management team.

FHA's appointed external health and safety consultant will annually review all key management arrangements, policies and risk assessments, with support from the CE and ACM.

The CE and ACM will also undertake periodic review meetings with the organisation's appointed health and safety consultant. This will provide continued assurance to the board and other stakeholders, that the business remains compliant with its statutory requirements.

Additional internal audits may be conducted in the case of:

- Significant nonconformity in a process or repetition of the same nonconformity (decision about whether the nonconformity is significant and requires additional audit is made by the ACM).
- Significant change in process, activity, and/or products and services (decision about whether the change is significant and demands additional audit is made by ACM).

On completion of any audit, the auditor will report the findings to the ACM, CE and the A&A Committee.

Follow-up activities

Corrective and preventative actions are undertaken as required and outlined within any action plan. The CE & ACM are responsible for ensuring that all necessary corrective actions are undertaken without unnecessary delays. Where the action lays outwith the CE & ACM, the appointed health and safety consultant, or other parties (e.g. Fire Safety consultant, CDM manager etc.) will take responsibility.

The CE and ACM will report to the A&A Committee progress against recommendations from internal audits where agreed.

After performing corrective actions, if necessary, a follow-up audit may be conducted, to assess the effectiveness or verification of corrective actions.

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 25 of 27

Employees must continue to:

- Regularly check work equipment, including any personal protective equipment (PPE) supplied, is safe before use – ensuring all defects and hazards are properly recorded and reported to management.
- At all times, co-operate with management arrangements in respect of workplace inspections
- Follow any training, information, guidance and instruction given by the employer for checking and inspection of safe practices
- Ensure that all identified workplace hazards immediately reported to the employer or external health and safety consultant.
- Ensure all workplace incidents, accidents, near-misses and dangerous occurrences are reported effectively.

Arranging the health and safety reviews

The CE and ACM will undertake periodic review meetings with the organisation's appointed health and safety consultant.

The objective of the reviews will be to ensure the suitability, adequacy, and effectiveness of FHA's health and safety policies and arrangements, as well as to discuss any issues.

3.26 Visit by an Enforcement Officer

The Health and Safety at Work etc. Act 1974 and associated legislation conveys powers on inspectors who are appointed by the relevant enforcing authority, in order that they ensure statutory requirements are being complied with.

Most dealings with those on whom the law places duties (employers, the self employed, employees / subcontractors and others) as set out in health and safety law are informal, with inspectors offering information, advice and support, both face to face and in writing.

Formal enforcement mechanisms may also be used, such as improvement notices where a contravention needs to be remedied and prohibition notices where there is a risk of serious personal injury, or ultimately, prosecution.

Non-compliance can lead to prosecution, but this is always seen as the last step in the process.

FHA recognises the need to co-operate with enforcement authorities. For this reason, it is important that all required documentation be maintained and kept up to date. Such documentation will include the health and safety policy, relevant risk assessments, emergency plans etc. It is every employee's responsibility to co-operate with the organisation to ensure that all health and safety documentation is kept up-to-date, and all relevant documentation is completed where necessary.

- Risk Assessments
- Health and Safety Policy
- Induction and training records
- Maintenance, test and inspection records

An employer or an employee may not obstruct an enforcement officer from carrying out their duties; this includes: entry to workplace, access to H&S documentation or the interviewing of employees and subcontractors.

3.27 Policy Review

Approved by	Date	Review date
Board – Version 6	12.03.25	March 2026
		Page no.: 26 of 27

Health and safety policies need to be reviewed regularly to check that they remain relevant. The Health and Safety Executive (HSE) states that a health and safety policy should be reviewed at least once a year.

Policies should also be reviewed if any changes are made to the work environment, for example, if new processes are adopted, new equipment is introduced, or the number of people working on-site changes. It's important to note that reviewing a policy may not result in it needing to be updated. The reviewing process is simply for businesses to check whether the current policies are still applicable. If they are, no changes need to be made.

All H&S policies will be reviewed and monitored by the CE, ACM and FHA's external H&S consultants.

The Board will review any amendments or additions to the policy, before it is approved and circulated to the employees of the business.

This policy or any revision of it will be drawn to the attention of every employee of the organisation and new employees as they are recruited.

The contents of documents produced under this policy will be brought to the attention of all employees to whom the contents are relevant. This policy and any documentation produced under it will be added to or modified as required and will be reviewed annually.

Approved by	Date	Review date	
Board – Version 6	12.03.25	March 2026	
		Page no.:	27 of 27