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**Title:** Health and Safety - Group Policy

**Business Function:** All Functions across Sanctuary Group

**Author:** Group Head of Health and Safety

**Authorised by:** Group Board

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**Sanctuary Group:**  
Sanctuary Group is a trading name of Sanctuary Housing Association,  
an exempt charity, and all of its subsidiaries.

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## 1. Policy statement

- 1.1 This policy sets out Sanctuary Group's (the Group's) general Health and Safety policy statement, and the organisational systems and arrangements which ensure compliance with applicable legislation and the principles of recognised Management Systems, in particular ISO 45001 Occupational Health and Safety Management System (ISO 45001).
- 1.2 The Group is working towards aligning all its health and safety policies and procedures to the principles of ISO 45001 and in particular the High Level Structure common to all management standards.
- 1.3 The scope of the Health and Safety Management System includes all Group sites and operations and interested parties and stakeholders. This includes temporary and agency workers in respect of how the group manages health and safety in relation to the agency workers tasks. A detailed procedure can be found in the [Recruitment and Selection - Group Policy and Procedure](#).
- 1.4 The Health and Safety Policy statement (**Appendix 1**) is approved by the Group Chief Executive. It is reviewed on an annual basis and is communicated to all staff and other interested parties by the following routes:
  - at induction and referenced in the Staff Handbook;
  - on noticeboards; and
  - on Solis.
- 1.5 The Group will establish, document, implement, maintain and continually improve a Health and Safety Management System (**Appendix 2**). The detail will be determined with reference to the list of applicable legislation held and maintained by legal services, the extent of the Group's risks and the context of its activities, and the results of any internal reviews, external audits and site inspections.

## 2. Roles and responsibilities

- 2.1 Leadership is an essential requirement of a successful health and safety management system. The responsibilities of those roles with a significant impact on health and safety are defined in the chart at **Appendix 3**. Further responsibilities for specific aspects of health and safety will be stated in any relevant policies and procedures which form part of the health and safety management system.
- 2.2 The Group Director - Corporate Services has been appointed by the Group Board, to be the Group Board member to champion health and safety and to raise significant issues.

### 3. References and sources

3.1 The following are the principal references for this policy:

- [Health and Safety at Work etc. Act 1974](#) (as amended)
- ISO 45001 - Occupational health and safety management systems - requirements.

### 4. Impact on diversity

4.1 The Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with its '[Fairness for All](#)' Single Equality Scheme.

### 5. Resident consultation

5.1 This policy is for internal use only, therefore consultation was not undertaken.

### 6. Monitoring and compliance

6.1 The methods of monitoring and compliance are stated within Section 3 of the Health and Safety Management system - **Appendix 2**.

6.2 Period of review

6.2.1 Until a new policy is formally adopted this document will remain in force and operational.

6.2.2 This policy will be reviewed in accordance with the policy review programme agreed by Group Board.

6.2.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Group Director - Corporate Services will initiate an immediate review.

### 7. Approval

7.1 This policy is approved by Group Board.

### 8. Operational arrangements

8.1 This policy should be read in conjunction with the appendices forming part of this document and other Health and Safety procedure documents.



## Health and Safety Policy Statement

Sanctuary Group (the Group), its Board and Directors are committed to the provision of high standards of health and safety across all parts of the Group's operations. The Group recognises its legal and moral duty to protect the safety, health and welfare of all employees, tenants, residents, customers and any other person who could be affected by the acts or omissions of the Group in its day to day operations.

The Group will provide the necessary resources to develop and maintain policies and procedures, facilitating a safe and healthy workplace to prevent injury and ill health. The Group will sponsor a culture of safe working, safety awareness and learning, and will ensure that all staff are made aware of Group policy at induction and when changes are made.

The implementation and monitoring of policy and procedures will be prioritised to ensure that all staff work towards the continual improvement and maintenance of health and safety standards by the setting and reviewing of objectives and targets involving all areas of the Group.

Health and safety is an integral part of the management function and all personnel are responsible for the implementation of this policy. Every person has a role to play in its success. The Group enables and encourages all employees to fulfil their role in making a positive contribution towards health and safety at work. Ownership of this policy is encouraged through effective communication and consultation with staff at all levels using Health and Safety Forums, Staff Council and online consultation processes.

The Health and Safety - Group Policy will be reviewed on an annual basis or when major changes to the Group affect the policy. All reviews will be conducted in line with the Group's commitment to staff consultation.

**Signature:**

A handwritten signature in black ink, appearing to read "Craig Moule", written over a horizontal line.

Craig Moule  
**Group Chief Executive**

**Date:** 25 March 2020

## Appendix 2

**Health and Safety Management System****1. Planning for health and safety****1.1 Risk assessment**

1.1.1 A Group procedure on conducting risk assessments has been established and implemented; [Risk Assessment - Group Procedure](#). Within this procedure there are requirements for ongoing hazard identification, evaluation and the determination of necessary controls. The procedure is located within the policies and procedures section of [Solis](#).

1.1.2 This procedure requires a proactive assessment of risks associated with:

- routine and non-routine activities;
- all premises and persons within the defined scope;
- human behaviour, capabilities and other human factors;
- external hazards that may impact on employees within the business.
- infrastructure, equipment and materials in use;
- changes or proposed changes to activities, materials and premises.
- applicable legal requirements; and
- design of work areas, processes, installations, machinery/equipment, operating procedures and work organisation including its adaptation to human capabilities.

1.1.3 The risk assessment process evaluates existing control measures and then requires further control measures, if required, that follow a hierarchy stated in the [Management of Health and Safety at Work Regulations](#).

**1.2 Legal requirements**

1.2.1 A list of all applicable legal requirements that place duties on the Group is held and maintained by Legal Services. This is cross referenced with relevant procedures within the health and safety management system.

**1.3 Objectives and plans**

1.3.1 Health and Safety objectives for the Group will be established, implemented, and maintained by the Group Head of Health and Safety. Corporate objectives will be set annually and agreed by the Executive Committee. Managing Directors will set objectives for individual operations, which will be approved by the Executive Committee.

1.3.2 Objectives at all levels will take into account legal requirements and the Group's significant risks as detailed on relevant risk maps.

1.3.3 To ensure the objectives are achieved the Group Head of Health and Safety and Senior Health and Safety advisors will develop implementation plans detailing the steps to be taken to achieve the objectives. These will include designated responsibilities, targets and time frames. Quantitative statistical data will be collated to monitor conformance with the plan when relevant. Progress against the plan will be reviewed by the Group Head of Health and Safety and reported to the Executive Committee or individual Directors, as appropriate.

## 2. Implementation and operation

2.1 Resources, roles, responsibility, accountability and authority

2.1.1 The Group Board has ultimate responsibility for health and safety and this commitment is communicated in the Policy Statement signed by the Group Chief Executive. The Group Board has delegated operational responsibility to Group Directors.

2.1.2 All staff members have a degree of personal responsibility for health and safety. The main responsibilities are detailed at **Appendix 3**. Specific responsibilities will be stated in other health and safety procedures where relevant.

2.2 Competence, training and awareness

2.2.1 For Group functions, a [Learning and Development - Group Policy and Procedure](#) has been established, implemented, and is maintained. This is accompanied by an Induction Framework and a Training Needs Analysis matrix that ensures all employees performing tasks, that can impact on health and safety are competent on the basis of education, training or experience.

2.2.2 The [Learning and Development - Group Policy and Procedure](#) will ensure sufficient training is provided so that employees are aware of:

- the health and safety consequences of their work activities, behaviours and the benefits of improved performance;
- their duty to comply with health and safety policy and procedures; and
- relevant requirements of this management system including emergency preparedness and response arrangements.

2.3 Communication, participation and consultation

2.3.1 A health and safety communications strategy and a procedure for the participation and consultation with employees via Health and Safety Forums has been established, implemented and is maintained. All documents are available on the health and safety page of [Solis](#).

2.3.2 The health and safety communications strategy includes consideration of:

- internal communications between different levels and functions;
- provision of essential communication to contractors and visitors; and
- the receipt, documenting, and response to external interested parties including residents and tenants.

## 2.4 Control of health and safety documentation

2.4.1 Policies, procedures, guidelines, and forms which are part of the health and safety management system are approved, reviewed, and updated in line with Group guidelines and protocols. This Health and Safety - Group Policy and its associated procedures are approved prior to issue by the Executive Committee.

2.4.2 All current health and safety policies, procedures, guidelines, and forms are held on Solis. These documents are treated as the controlled versions, and any printed versions as uncontrolled.

2.4.3 In addition to the annual programme of reviews, health and safety documentation may be reviewed as a consequence of:

- management reviews;
- internal reviews or external audit; and/or
- new or amended legal requirements.

## 2.5 Operational control

2.5.1 Risks associated with work activities and projects are identified by carrying out risk assessments. Significant risks to the Group are identified, assessed and treated in accordance with the [Risk Management - Group Policy and Procedure](#). These are recorded on assurance maps which are regularly reviewed or escalated via the Risk and Audit committee.

2.5.2 The need for operational controls including written instructions or procedures is identified as part of the risk management processes and will, where deemed necessary, be put in place for:

- routine work activities;
- construction, re-modelling and reinvestment activities;
- maintenance of plant and premises;
- management of buildings and sites including movement of vehicles;
- activities that may impact on the health of staff;
- use of hazardous machinery and substances;
- purchase of goods, equipment and services;
- control of contractors and visitors; and/or
- changes or proposed changes in the Group and its activities including acquisitions.

2.5.3 The ongoing suitability and effectiveness of operating controls will be reviewed by the implementation of procedures described in the audit process (section 3.2).

## 2.6 Emergency preparedness and response

2.6.1 The [Business Continuity - Group Policy and Procedure](#) states the method by which all areas of the business will identify, analyse, and assess those incidents where documented emergency response plans are required.

2.6.2 It also specifies the type and frequency of exercises and reviews of emergency plans and the means by which they shall be maintained.

2.6.3 The [Fire Safety Management - Group Policy and Procedure](#), with associated Technical Guidance Notes, states the measures in place to prevent, mitigate and react to fire related emergency events.

## 3. Checking

### 3.1 Performance measurement and monitoring

3.1.1 Processes are in place within each operation for the monitoring and measurement of health and safety. Each operation has in place a plan detailing the type and frequency of performance measurement, the forms and guidelines for conducting performance measurement, and the maintenance of records.

3.1.2 These include:

- routine workplace and work activity inspections;
- planned inspections of equipment and installations;
- accident reporting and investigation;
- occupational health interventions;
- objectives and plans; and/or
- escalating and reporting via RADAR.

3.1.3 The implementation and maintenance of these processes and plans are monitored by the Group Head of Health and Safety and National Compliance team.

### 3.2 Evaluation of compliance with legal and policy requirements

3.2.1 This applies to all Group functions. A series of internal audit templates, for all health and safety policies and procedures are being developed.

3.2.2 The internal audit programme will internally verify that policies and procedures comply with applicable legislation on the register held by Legal Services. An audit plan of procedural audits will be agreed with the Group Director - Corporate Services. These will be carried out across all business areas and will measure compliance with policy and procedure requirements.

3.2.3 In addition, those business areas currently holding accreditation to OHSAS 18001 will be subject to audits of the management system by an appointed external body on an annual basis. The findings will be documented and fed back to the relevant Directors in closing meetings and management reviews (see Section 4). Each operation's Senior Health and Safety Advisors will manage this process.

3.2.4 The outcomes of the evaluations and external OHSAS 18001 audits will be taken into consideration when setting objectives.

### 3.3 Accident and event investigation

3.3.1 The [Accident Reporting and Investigation - Group Procedure](#), has been established, implemented, and is maintained. They require the recording, investigation and analysis of accidents, and events in a timely manner and for corrective and preventive actions to be identified and addressed.

3.3.2 Quantitative data is derived from the reports and investigations and presented to Executive Committee on a monthly basis. The significant outcomes of investigations will also be taken into consideration when setting future objectives.

### 3.4 Non-conformity, corrective action and preventive action

3.4.1 Procedures are in place across the business for the recording and monitoring of actions arising from a range of activities. These include:

- periodic tests of emergency procedures, for example fire drills;
- accident and incident investigations;
- internal reviews and external OHSAS 18001 audits and legal requirement compliance reviews;
- site inspections;
- performance monitoring;
- compliance activities;
- Fire Risk Assessments;
- occupational health monitoring;
- compliance activities; and
- occupational health monitoring.

3.4.2 Senior Health and Safety Advisors for each operation are responsible for ensuring methods to collate and monitor corrective actions, arising from activities such as accident and event investigations and risk assessments, to completion are in place. The National Compliance team is responsible for monitoring the actions arising from compliance activities and fire risk assessments and reporting these to Executive Committee.

### 3.5 Control of records

- 3.5.1 The requirement for individual documented records will be included in relevant procedures. Records should be kept in accordance with the [Data Protection - Group Policy and Procedure](#).

## 4. Management review

- 4.1 An annual review of health and safety will be presented to the Executive Committee and Group Board. The Senior Health and Safety Advisors will hold similar reviews within their operations at least once per year. The purpose of the review is to:

- ensure the continuing suitability, adequacy and effectiveness of the management system; and
- identify requirements for change to the management system, procedures and objectives.

- 4.2 The following items will comprise the core content of the annual review, and each operation's reviews where relevant:

- results of internal and external audits and evaluations of compliance;
- results of site inspections;
- items raised by the Health and Safety Forums;
- communications from external agencies, for example the enforcing authorities;
- extent to which objectives and plans have been met;
- status of accident and incident investigations, corrective and preventive actions;
- follow up actions from previous management reviews;
- changes that impact on the management system including new or pending legislation; and
- recommendations for improvement.

- 4.3 Action plans from both levels of review will be recorded. The outputs from the annual Group review will determine any changes to the Health and Safety - Group Policy and objectives, allocated resources and the format and content of the management system.

## Appendix 3

**Executive Committee and Group Directors**

- Establish, implement and maintain a health and safety management system with procedures.
- Take an interest in and publicly support health and safety issues, consulting with the health and safety advisors.
- Ensure compliance with health and safety policies and procedures within the operations.
- Set annual health and safety objectives and review performance.
- Ensure adequate provision of resources to meet health and safety requirements.

**Directors and Senior Managers**

- Identify and assess significant risks relevant to area of responsibility and communicate to staff.
- Ensure implementation of health and safety policies and procedures.
- Ensure staff receive appropriate levels of training and information.
- Consult with the operations health and safety advisors and representatives.
- Ensure appropriate levels of resource are allocated to health and safety issues.
- Ensure all accidents, incidents, and near misses are reported.
- Include health and safety on the agenda of team meetings.

**Health and Safety Representative**

- Attend Group Health and Safety Forums, representing employees in their business area.
- Represent the interests of employees when consulted on health and safety matters.
- Highlights hazards and concerns.

**Corporate Risk Manager**

- Co-ordinate the response to significant incidents.
- Develop and promote a Risk Management Framework with tools and techniques to support the framework.

**Group Board**

- Set the direction for effective health and safety management.
- Establish a Health and Safety Policy.
- Appoint a health and safety 'Champion'.
- Include health and safety on the agenda of meetings and consider the implications of changes may have on health and safety.
- Ensure health and safety arrangements are adequately resourced.
- Obtain competent advice on health and safety and ensure a process is in place to consult with employees.
- Consider reports on compliance and safety performance.
- Conduct an annual review of health and safety performance.

**Group Head of Health and Safety**

- Develop and review policies and procedures and develop a health and safety management system.
- Provide competent advice on health and safety keeping up to date on law and best practice.
- Manage the accident and incident reporting system, approve inspection and audit processes.
- Monitor the content and delivery of health and safety training.
- Report on a regular basis to individual Directors, Executive Committee, and Group Board.

**Senior Health and Safety Advisors**

- Manage the provision of health and safety services to their operation.
- Deliver health and safety training.
- Provide regular reports to the Group Head of Health and Safety and Group Directors.
- Manage compliance with ISO 45001 systems and arrange for external audits.
- Deliver inspection programmes.
- Conduct and review accident and incident investigations.
- Conduct health and safety audits.

**Managers/Supervisors**

- Implement health and safety policies and procedures.
- Identify and assess significant risks relevant to area of responsibility and communicate to staff.
- Ensure the training needs of staff are identified and new staff receive induction training.
- Ensure adequate supervision is available at all times and safe systems of work are complied with.
- Maintain good levels of housekeeping and take part in inspections and assessments as required.
- Ensure all accidents, incidents and near misses are reported.
- Include health and safety on the agenda of team meetings.

**Employees**

- Take care of own health and safety, and that of others.
- Follow training given and use safety equipment as instructed.
- Comply with health and safety procedures and co-operate with line management.
- Report all hazards, accidents, near misses, and damage and any shortcomings in the management of health and safety.
- Do not interfere or misuse anything provided in interests of health and safety.
- Inform any visitors or contractors under your control of emergency procedures and relevant risks.

**Facilities Services Manager**

- Ensure effective health and safety management at all applicable office facilities.
- Ensure contractors are managed so as to ensure good standards of health and safety.
- Manage systems for the safety of visitors to office locations.