



Health and Safety Management Framework

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| Version Number | 1 |
| Revision Date | October 2023 |
| Department | Business Support and Transformation |
| Author | Health Safety and Wellbeing Manager |
| Reason for Framework Creation/Revision | New Framework – updated following the review of all Hanover Health & Safety Documentation |
| Data Protection | This Framework conforms to Hanover’s data protection Framework and procedure |
| Equalities | Policies which have been updated as part of the framework have included an Equality Impact Assessment |
| Sustainability | No impact |
| Proof Read By | Director of Business Support & Transformation |
| Date Approved | 26 October 2023 |
| Approved By | Board |
| Next Review Due | 26 October 2026 (Statement of Intent updated annually) |
| Audience – Training and Awareness Approach | All employees will be briefed by email of the updated Framework. Individual H & S training on policies is done with employees as part of the Learning Needs Assessment. |
| Effective Date | 27 October 2023 |
| Internal References – Policies & Procedures (Located on The Hub) | Risk Management Framework Business Continuity Plan |
| External References | Various H & S Legislation |

1. Purpose of Framework

- 1.1 The *Health and Safety at Work etc Act 1974*, supported by a range of regulations, imposes statutory duties on employers and employees. To enable these statutory duties to be met, Hanover, as far as is reasonably practicable, will ensure that responsibilities for health and safety are assigned, accepted, and fulfilled at all levels of the organisation; that all practical steps are taken to ensure the health, safety and wellbeing of all customers and employees; and will conduct the business in such a way that the health and safety of visitors, contractors and the public is not put at risk.
- 1.2 The Scottish Housing Regulator (SHR), which regulates Hanover as a Housing Association, requires us to notify them of “any tenant and resident safety matter which has been reported or is being investigated by the Health & Safety Executive or reports from other regulatory or statutory authorities, or insurance providers, relating to safety concerns”.
- 1.3 To enable Hanover to meet its statutory duties and commitments set out above, this comprehensive H&S Management Framework sets out our agreed framework for managing Health, Safety and Wellbeing and references our policies, procedures, management reports risk assessment framework and all necessary arrangements for Health, Safety & Wellbeing (HS&WB).
- 1.4 Our framework will also ensure that we have robust reporting of HS&WB information and key performance indicators to ensure we continually improve.

2. Statement of Intent

We will, annually, review and publish our Health Safety & Wellbeing Statement of Intent. This will be signed off by our Chief Executive and will be made available across Hanover, including within our housing developments. A copy of this year's statement of intent is below.



Hanover (Scotland) Housing Association Ltd

Health, Safety & Wellbeing Statement of Intent

This Statement sets out the Hanover's commitment to achieving high standards of Health, Safety & Wellbeing (H,S&W) across all of its services and activities.

1. Hanover, as far as is reasonably practicable, will prevent injuries, incidents and ill-health. It will also ensure that the working environment of all employees is safe and without risk to health or safety, and that adequate provisions are made with regard to the facilities and arrangements for their welfare at work.
2. The Board, supported by the Chief Executive, is responsible for the conduct of the Hanover's business. This includes continuously learning and driving forward improvements in H,S&W.
3. Hanover has appointed the Director of Business Support & Transformation as the 'Director accountable for H,S&W'.
4. The strategic as well as operational requirements of the H&S function will be led by the Hanover's Health, Safety & Well-being Manager, who is the principal competent person within Hanover, as required by legislation.
5. The *Health and Safety at Work etc Act 1974*, supported by a range of regulations, imposes statutory duties on employers and employees. To enable these statutory duties to be met, Hanover, as far as is reasonably practicable, will ensure that responsibilities for safety and health are assigned, accepted and fulfilled at all levels of the business; that all practicable steps are taken to ensure the health, safety and welfare of all service users and employees; and will conduct the business in such a way that the health and safety of visitors, contractors and the public is not put at risk.
6. Hanover's management and communications structure will ensure that a robust framework for implementation and control, reporting and consultation exists across Hanover for the effective delivery of its H,S&W objectives.
7. To enable Hanover to meet its statutory duties and commitments set out above, a comprehensive Health & Safety Management Systems will be developed, implemented and reviewed, which will include written policies, procedures, management reports and arrangements for all relevant areas of H,S&W.
8. Hanover requires **employees** to take all reasonable steps to safeguard the health and safety of themselves and of other persons who may be affected by their acts or omissions at work. It also requires staff to comply with any safe working procedures, practices or 'rules' set out by Hanover following the information, instruction and training provided.

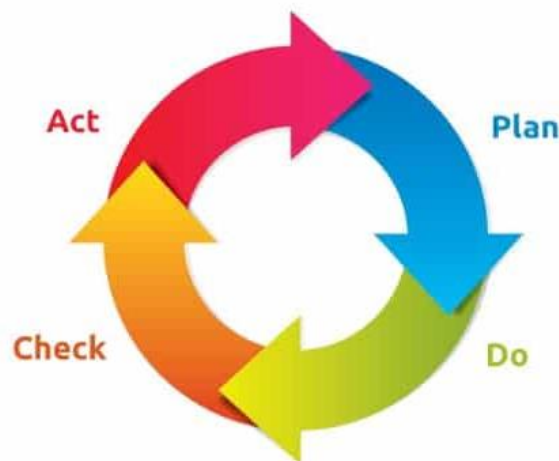
Chief Executive

Date 18 January 2024

HEALTH AND SAFETY MANAGEMENT FRAMEWORK

3. Framework Scope

- 3.1 In compliance with the requirement of Section 2 of the Health and Safety at Work Act 1974, we are discharging our statutory duties by preparing this written Health and Safety Framework. A copy of the Framework and associated documentation, which outline our health and safety arrangements and organisational structure, are held on our intranet and available to all employees.
- 3.2 We are aware that in order to ensure the Health and Safety Management framework is maintained effectively; it is essential that all policies and information are up-to-date and accurate. Should any changes occur within Hanover e.g., introduction of new processes or systems etc. or, if changes occur that impact on our health and safety responsibilities, this will be updated by the Health, Safety and Wellbeing Manager.
- 3.3 The Health and Safety Management Framework will be monitored by the Health, Safety and Wellbeing Manager and reviewed on an annual basis, at the same time as the Statement of Intent is reviewed. In addition, arrangements within the Framework will be reviewed if accident/ incident / near miss trends or the findings of any management inspections or audits raise Health & Safety concerns.
- 3.4 In order for us to discharge our statutory duties, employees are required, by law, to co-operate with managers in all matters concerning the health, safety and welfare of themselves and any other person who may be affected by their acts or omissions whilst at work. We encourage all employees to inform their manager of any areas of the Health and Safety Management Framework that they feel are inadequate or misrepresented to ensure that the Framework is maintained as a true working document.
- 3.5 Our Health & Safety Policies follow the methodology within the Health & Safety Executives publication HS(G) 65 Managing for Health and Safety.
- 3.6 The methodology known as Plan – Do – Check – Act (PDCA), as shown in the diagram below, is used in all aspects of managing health and safety.



3.6.1 Plan

- Policies and procedures are created, updated and approved via the Key Document Approval process to ensure compliance with the law, and best practice.
- Structures and arrangements are in place to ensure that communication throughout Hanover is appropriate and that health, safety and wellbeing for our customers and our employees is at the forefront of what we do.
- Performance indicators and monitoring are set by the Executive Leadership Team (ELT) and monitored on a monthly basis by the Senior Management Team and shared with members of the Health, Safety & Wellbeing Group. The Board reviews quarterly the Health, Safety and Management KPIs.

3.6.2 Do

- Risk is identified in Hanover and controls are put in place to limit those risks to a suitable level. Employees are trained to manage risk correctly.
- Resource is allocated based on the level of risk and priorities are set and improved upon.
- Sufficient resource is allocated to ensure the plan is enacted appropriately.

3.6.3 Check

- A variety of KPI indicators are used to check the effectiveness of our safety management and these are reviewed at various levels across Hanover.
- Internal Health & Safety audits are used to verify our practices and suggest areas for improvement.
- Hanover is committed to investigating accidents, incidents & near misses and cases of occupational disease in order to improve the health, safety and welfare of our employees.

3.6.4 Act

- Hanover will learn from mistakes, and take action to prevent reoccurrence of any accidents, incidents & near misses. Performance will be reviewed regularly, in light of change in law or circumstances.
- The results of performance measures will be acted upon in a sensible risk-based manner.

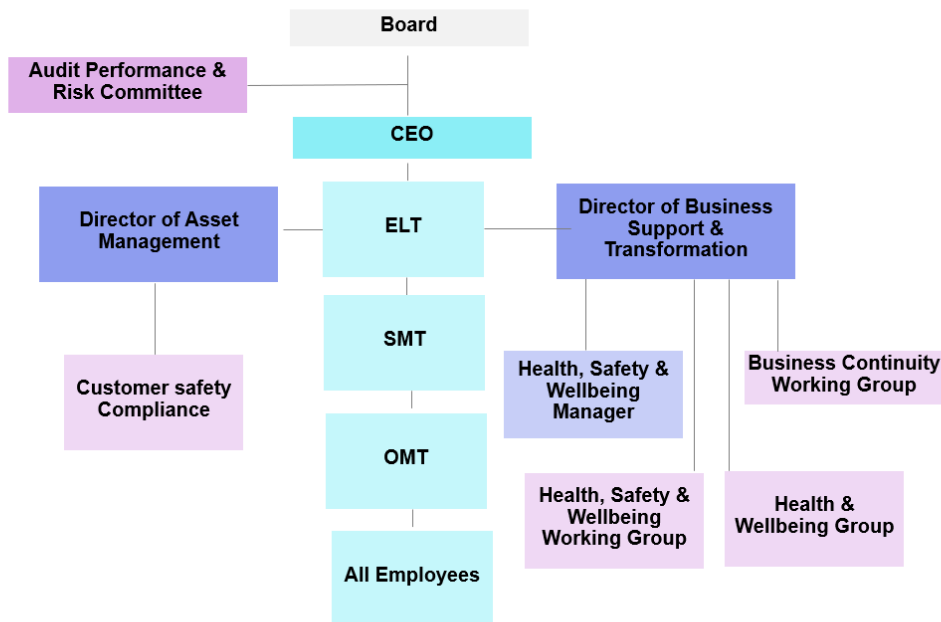
3.7 The purpose of the Health and Safety Management Framework is to pull together all of the health, safety and wellbeing policies, and guidance across Hanover, to mitigate the risks associated with its activities, and to continually improve its health, safety and wellbeing performance.

HEALTH AND SAFETY MANAGEMENT FRAMEWORK

4 Structure and Responsibilities

4.1 Whilst Hanover, as the employer, has overall responsibility for ensuring the health, safety and wellbeing of all its employees, to facilitate effective management it is necessary that the responsibilities are delegated to key post holders. The roles, responsibilities and authorities of these key post holders are detailed below in the Health Safety & Wellbeing Organisation Chart. These health and safety responsibilities may be in addition to any other responsibilities already included in individual job descriptions.

Health, Safety & Wellbeing Organisation chart



4.2 The Board & Audit, Performance & Risk (APR) Committee

4.2.1 The Board collectively hold overall responsibility for health, safety and wellbeing at Hanover and provide strategic leadership, direction and oversight when setting the Framework for delivering effective performance in health, safety and wellbeing and risk management. Health & safety responsibilities for the Board are outlined in the Scheme of Delegation and include;

- Approval of the Health, Safety and Wellbeing Plan;
- Scrutinise an annual report on Health, Safety and Wellbeing including the progress against the HS & WB Plan;
- Receive regular reports on health, safety and wellbeing including RIDDOR and post reports of any major incidents.

4.2.2 Where delegated by the Board, the APR committee will oversee in-depth reviews as required and report back to the Board.

4.3 Chief Executive (CE)

4.3.1 The Chief Executive is responsible for the day to day running of Hanover and is directly accountable to the Board for the implementation of the Health, Safety and Wellbeing Framework. The Chief Executive is also responsible for ensuring that the required resources are made available to implement, operate and maintain Hanover's health & safety Framework management system. The Chief Executive shall also;

- Annually sign the Health, Safety and Wellbeing Framework Statement of Intent to demonstrate commitment at the highest level;
- Promote a positive health, safety and wellbeing culture across Hanover and ensure that health, safety, and wellbeing is ranked with equal importance to other management responsibilities;
- Ensure that the health, safety, and wellbeing implications of all executive decisions are addressed;
- Ensure that adequate and competent health, safety and wellbeing advice and assistance is available to all employees;
- Nominate member(s) of the Executive Management Team who shall champion issues of health, safety and wellbeing and risk management.

4.4 Director of Business Support & Transformation (Director responsible for Health, Safety & Wellbeing)

4.4.1 The Director of Business Support & Transformation (BST) is responsible for developing, implementing, and reviewing the HS & WB Plan, Health and Safety Management Framework and arrangements that have been approved by the Chief Executive and the Board. The Director of BST will also:

- Be accountable for the HS&WB performance of Hanover against the H&S Management Framework and associated arrangements.
- Report to the Chief Executive on H&S performance, budget implications, resource implications, safety failures and other HS&WB issues of significance.
- Ensure that HS&WB considerations are taken into account for all business activity. The objective is to minimise risks as early as is reasonably practicable.
- Be responsible for managing the Health, Safety & Wellbeing Manager.
- Be responsible for dealing with all HS&WB issues referred to them by the HSWB Manager, employees and for liaising/co-operating with the H&S Executive and any other regulatory bodies relating to this function.
- Ensure that there are adequate employee training programmes in HS&WB in place and that all employees are given appropriate instruction and information to reduce the risks associated with their work to an acceptable level.

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- Be responsible for reviewing all reports and documentation provided to them in accordance with the H&S Management Framework and arrangements and to take appropriate action to rectify non-compliances and to achieve continuous improvement.
- Be responsible for the maintenance of the Business Continuity Plan (BCP). This will involve interaction and communication with the HS&WB Manager and other functions as required.

4.4.2 The Director of Business Support & Transformation will work closely with other Directors to ensure that there is full co-operation between HS&WB Manager and all teams across Hanover.

4.5 Director of Asset Management

4.5.1 The Director of Asset Management is responsible for developing policies and procedures, with the assistance of the HSW Manager, relating to all aspects of H&S within the Asset Management function, which includes Customer Safety Compliance Team. The Director of Asset Management will also be responsible for:

- Maintaining records of all H&S information as required by legislation/ Hanover policies and procedures and, in particular, information received from and provided to contractors in relation to H&S.
- Communicating with contractors in respect of H&S and for arranging responses to any H&S related questions and queries. Support will be available from the HSW Manager where required. Records of all significant communications will be retained by the Director of Asset Management / Team.
- Operating an 'Access to Area' permit system for all contractors. Records of all such permits will be retained by the Asset Management Team.
- Customer Safety Compliance and will assign responsibility to identified employees within Asset Management for managing facilities related to H&S issues, including but not limited to:
 - Gas Safety
 - Electrical Safety
 - Fire Safety
 - Asbestos
 - Water Hygiene Safety
 - Lift Safety
 - Damp and Mould related issues.

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- Providing employees in the Asset Management Team with adequate and appropriate information, instruction, training and support.
- Ensuring that the Asset management team's policies and procedures comply with H&S requirements. The Director must also ensure that effective corrective and preventive action is taken where the law, policies or practices are breached, including required communication with ELT.

4.6 All Directors

- 4.6.1 Due to the managerial and leadership functions performed by Directors, it is recognised that Directors are responsible for implementing the H&S Management Framework and associated arrangements within their sphere of influence. They may be held liable where H&S offences are committed with their consent, connivance or neglect.
- 4.6.2 Directors will ensure that there is active participation from their teams in the Health, Safety & Wellbeing Working Group. This involves the identification of Health, Safety & Wellbeing concerns within their teams, the raising of pertinent issues for consideration by the Group and the actioning of all measures identified by the Group and management employees as required.
- 4.6.3 Directors will implement all relevant policies, procedures, and arrangements within their Teams, as required by the H&S Management Framework, Health, Safety & Wellbeing Working Group, and other direction from senior managers.
- 4.6.4 Directors are responsible for the Health & Safety risk assessment process within their Teams. This includes ensuring that all appropriate risk assessments are completed and reviewed timeously and that all identified risk control measures are implemented.
- 4.6.5 Directors will ensure that all employees adopt safe working practices and procedures, identifying any training requirements and properly use any control measures, protective equipment etc. that are appropriate for the work carried out. This involves the provision of adequate and appropriate support, supervision, training and information.
- 4.6.6 Where Directors identify the need for further training or any other form of health & safety risk control for employees, the issue will be reported without undue delay to the Health, Safety & Wellbeing Working Group or HSW Manager.
- 4.6.7 Where Directors identify any significant breach of H&S procedures, appropriate action will be taken by them in consultation as appropriate with the HSW Manager to reduce the risk in the short term. The issue will be reported to the HSW Manager without undue delay. Where this identifies potential disciplinary issues, the HSW Manager should inform the appropriate manager.
- 4.6.8 Directors must ensure their policies and procedures comply with H&S within their functions and for taking effective action where the law, policies or practices are breached.

4.7 Health, Safety & Wellbeing Manager (HSW Manager)

- 4.7.1 The HSW Manager is responsible for organising, planning, implementing, reviewing, and measuring performance and providing competent technical and legislative advice to Hanover as required to meet the requirements of the Management of Health and Safety at Work Regulations 1999.
- 4.7.2 The HSW Manager reports to the Director of Business Support and Transformation and is responsible for developing and implementing an H&S Management Framework, developing and implementing the Health, Safety & Wellbeing Plan and will:
- Keep up to date with all legal, regulatory, and best practice developments in Health, Safety & Wellbeing, communicating substantive issues to the Director of Business Support and Transformation as soon as reasonably practicable.
 - Provide technical support to all employees undertaking Health & Safety risk assessments. The HSW Manager will also provide technical support to all employees on the implementation of the H&S Management Framework, Health & Safety risk management and compliance with Hanover HSWB policies, procedures, and arrangements.
 - Be responsible for providing guidance to the ELT, SMT and Board to achieve continual improvement in respect of all H&SWB management.
 - Work in conjunction with the HR & OD Team to provide support and guidance, in respect of Health, Safety & Wellbeing to update competencies for job roles. The HSW Manager will also provide or arrange for the provision of information, instruction and training to employees as required to ensure an adequate level of skills, knowledge and abilities exists throughout Hanover.

4.8 Health, Safety & Wellbeing Group

- 4.8.1 Directors will ensure that HS & W Group members are in place to represent each team.
- 4.8.2 HS & W Group members act as a 'focal point' for all H&S issues within their team. This includes employee representation and where HS&WB matters are not satisfactorily resolved, employees may approach their representative with any such issues and the representative will report all such issues to their Director as soon as is reasonably practicable.
- 4.8.3 H, S & W Group members provide support to the Directors as required to facilitate the HS&WB programme within their Teams. It should, however, be noted that the Directors retain accountability for HS&WB performance within their Teams.
- 4.8.4 H, S & W Group members are responsible for attending and participating in the HS&WB Working Group on behalf of the Directors and for communicating H&S information between their Directors, the Group and at team meetings.

4.9 All Employees

4.9.1 While the duties of employees have been made clear in previous sections, it is recognised that ALL employees have general duties to ensure their own safety and that of others. The Health and Safety at Work etc Act 1974 notes the following in respect of employees' duties:

"It shall be the duty of every employee while at work –

- a) to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work; and
- b) as regards any duty or requirement imposed on their employer or any other person by or under any of the relevant statutory provisions, to co-operate with them so far as is necessary to enable that duty or requirement to be performed or complied with".

4.9.1 Employees will comply with the policies, procedures and arrangements set out in the H&S Management Framework, associated documentation and with any information, instruction and training provided. In addition, safe working practices will be compiled with H&S risk control measures and what personal protective equipment that should be worn.

4.9.2 Employees will report to their manager or HSW Manager any identified breaches of H&S policies/ procedures, any accidents / incidents / near misses and any aspect which appears to them to give rise to a significant risk to the Health, Safety or Welfare of employees or other persons. Such reports will be made without undue delay.

4.9.3 Employees will inform their manager or HSW Manager, without undue delay, where they believe that further training or other risk control measures would be beneficial. Tasks must not be carried out where the employee believes significant risk to be present.

4.9.4 Employees will co-operate in all safety programmes, training, risk assessments and other initiatives that are intended to reduce H&S risk and will actively implement any control measures identified as being required.

5. Health, Safety & Wellbeing (HS&W) Working Group

5.1 The HS&W Working Group is a cross functional forum for the management of the Health, Safety & Wellbeing functions within Hanover. The work of the group will form three strands:

- Strategic Planning of Health, Safety & Wellbeing.
- Management & Monitoring of Health, Safety & Wellbeing Performance
- Lead on initiatives to promote Health, Safety & Wellbeing

5.2 The three strands can be further broken down as follows:

5.2.1 Strategic Planning of Health, Safety & Wellbeing

- Support the development of the Health, Safety & Wellbeing Plan – which is a supporting plan of the Delivery Plan.
- Assist with the development of a Health, Safety & Wellbeing annual budget submission to support the delivery of the HSWB Plan

5.2.2 Management of Health & Safety Performance

- Regularly review the key performance indicators to ensure that the function is being managed well and there is sufficient oversight allowing risks to be identified and actioned.
- Quarterly review the operation/functioning of the Health, Safety & Wellbeing performance results and agree the remedial action being proposed to resolve any issues.
- Review operational risks relating to Health, Safety & Wellbeing in line with the Risk Management Framework protocols.
- Continual review of health & safety guidance to ensure the wider team are able to enact all requirements easily.
- Monitor progress and support the delivery of the Health, Safety & Wellbeing plan.
- Review internal audit reports and monitor progress with required actions.

5.2.3 Lead on initiatives to promote Health, Safety & Wellbeing

- Promote the agreed Health, Safety & Wellbeing initiatives, promotions, and events across Hanover.

5.3 To facilitate this group, meetings will be scheduled quarterly, and membership will be formed by representation from all teams across Hanover.

- The Group will be chaired by the Director of Business Support & Transformation.
- All Group members will undergo suitable training in relation to HS&W Management and Responsibilities. This will ensure that all members have a working knowledge of the topic, commensurate with their role in the Group.
- The Group will discuss issues raised, Framework or policy changes due to a legislation changing or best practice.

6. Health & Wellbeing Group

- 6.1 The Health and Wellbeing Group support our strategic aims to be a Resilient Organisation and as well as a Great Employer.
- 6.2 The Health and Wellbeing Working Group is composed of representatives from different Teams, with the Wellbeing Lead, (HR People Partner) responsible for leading the delivery of our Wellbeing Project Plan which will support future Investors People accreditation.
- 6.3 The Wellbeing Working Group work in collaboration to achieve business as usual status for Wellbeing. Our goal is to ensure that there is a planned and structured approach for Hanover's wellbeing programmes and practices and that our people are given the tools and support to invest in their wellbeing, both at work and at home.

7. Framework Policies and Procedures

- 7.1 The implementation of the H&S Management Framework is designed to establish and implement suitable and adequate safety arrangements across Hanover. There are a number of Health, Safety & Wellbeing policies (with accompanying procedures) listed below which are in place to cover the day-to-day operational arrangements of health & safety. These can be found on the intranet for our employees, and where relevant to our customer homes, on our website as part of our model publication scheme.
- 7.2 The policies listed below ensures Hanover have established and implemented suitable and adequate safety arrangements for employees, customers and anyone else who visits our premises.
- Accidents / Incidents/ Near-Misses
 - Adverse weather and travel disruption
 - Asbestos
 - Contractor Management
 - Display Screen Equipment
 - Electrical Safety
 - Employee Wellbeing
 - Fire Safety
 - First Aid
 - Gas Safety
 - Hazardous substance (COSHH)
 - Infection Control (including Blood, Body Fluids and Sharps)
 - Lift safety
 - Lone Working
 - Moving and Handling (Manual Handling)
 - New and Expectant Mothers
 - No Smoking
 - Noise
 - Personal Protective Equipment
 - Vehicles and Occupational Driving (appended to our Car User Policy)
 - Violence and Aggression Management

- Water Hygiene
- Work at Height
- Young Persons

8. Competence, Training and Awareness

- 8.1 It is necessary to ensure that, throughout Hanover, the competence of all employees is established to enable them to carry out their designated role safely.
- 8.2 Competence may be defined in terms of appropriate skills, education, training and experience. To ensure the competence of employees, their training needs must be established through:
- A systematic identification of the health and safety competencies required at each level/role within Hanover, detailed in job descriptions;
 - The arrangements to identify and remedy any shortfalls between the competency level currently possessed and that required for the level/role to be implemented;
 - The provision of any training identified as being necessary, in a timely and systematic manner;
 - The ongoing assessment of employees to ensure that they have acquired and that they maintain the knowledge and competency required;
 - The maintenance of appropriate records of employee training and competency.
- 8.3 A suitable training programme for all employees will be developed by the Health, Safety & Wellbeing Manager and Organisational Development Manager and will include:
- Induction training on commencement of employment or on transfer to a new location or role;
 - Safety refresher training on a regular basis. This will be dependent on role but will be no less than a three-yearly frequency;
 - Specific training where the individual requires such training to effectively and safely carry out their roles and responsibilities (i.e., first aider/fire marshal).
- 8.4 The Organisational Development Manager will develop clear processes to ensure the maintenance of clear records of all employee training, and of training effectiveness evaluation.
- ### **9. Emergency Response Business Continuity**
- 9.1 Hanover has a Business Continuity Plan, which can be found on the intranet, to cover the services we provide including detailed emergency response planning. Nominated employees will be responsible for responding to incidents and emergency situations

in accordance with this Plan and on-call arrangements. The Business Continuity Plan outlines the actions to be taken when specified emergency situations arise, which includes the following;

- Identification of potential accidents and emergencies;
- Identification of the senior person to take charge during the emergency;
- Details of actions to be taken during the emergency, both during and outside of normal working hours;
- Details of action to be taken pending the arrival of the senior representative;
- Responsibility, authority and duties of employees with specific roles;
- Action to be taken in the event of serious injury;
- Action to be taken in the event of a fatality;
- Information to be provided for media enquiries.

9.2 Practice drills of emergency procedures will be carried out on a regular basis, in accordance with our Business Continuity Plan.

9.3 Detailed fire evacuation plans are prepared for our sites where there is a Development Manager and fire evacuation exercises and fire safety training carried out as specified in our fire safety policy and procedure.

9.4 Effective and suitable records of all emergency procedures and plans will be established and maintained for all offices and developments as required. These will include the following;

- ❖ Development Evacuation Plan;
- ❖ Emergency equipment list and register where required;
- ❖ Test and maintenance records for emergency equipment where required;
- ❖ Records of fire and emergency drills;
- ❖ Reviews of fire and emergency drills to ascertain efficiency and suitability;
- ❖ Recommended actions from all above.

9.5 The Risk, Governance & Assurance Manager will be responsible for co-ordinating and ensuring Emergency Response Plans are updated and linked to Hanover's Business Continuity Plan. The Governance team will be responsible for ensuring that regular testing of the plans is carried out, including the recording of the results of any tests, and for ensuring that any corrective actions are implemented.

10. Health & Safety Audits

- 10.1 The Health, Safety & Wellbeing Manager will prepare and update the Development Health & Safety Audit form which will be used to audit all Hanover developments where it is classified as a workplace – i.e., a staffed development.
- 10.2 The Development Health & Safety Audit is an internal audit programme to check and determine that all safety equipment (e.g., fire panel, emergency lighting, etc) is being maintained, tested and relevant documentation is in situ and available. Action plans will be created from the audits to support our continuous improvement.
- 10.3 Housing Officers and Care Operations Managers will use the Development Health & Safety Audit form to audit their development on a six-monthly basis and save a copy of the findings onto the relevant area on Teams, as this is a monitored KPI.
- 10.4 The Health, Safety & Wellbeing Manager will carry out ten audits annually over and above the audits carried out every six months. At the beginning of each year, the HSW Manager will identify where the 10 audits should be carried out based on a risk priority basis and ensuring that we carry out:
- Five H&S Audits in Housing
 - Three H&S Audits in Care
 - Two in Factoring

11. Health & Safety Risk Assessments

- 11.1 In accordance with the Management of Health and Safety at Work Regulations, all work activities will be assessed for general risks to the health, safety, and welfare of employees.
- 11.2 Risk assessments will be conducted by Hanover's managers at the developments with support and guidance provided by their manager and the Health, Safety and Wellbeing Manager. Office risk assessments will be carried out by the Health, Safety, and Wellbeing Manager.
- 11.3 Any significant findings in the risk assessment process will be recorded on the appropriate risk assessment forms and measures taken to reduce the risk to a reasonably practicable level of risk. If the risk cannot be managed / reduced to an appropriate level, then a safe system of work will be issued on a formal basis to those employees who need to be aware of the risks identified by the manager in that area in conjunction with the Health, Safety & Wellbeing Manager.
- 11.4 If there is new or changing legislation or changes in working practices or procedures, which may suggest that an assessment is no longer valid, the risk assessment will be reviewed.
- 11.5 Specific risk assessments will also be carried out in order to comply not only with the general requirements of the Management of Health and Safety at Work Regulations but also with specific requirements of other Regulations:

- Health and Safety at Work Act
- Management of Health and Safety at Work Regulations
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
- Fire (Scotland) Act
- Manual Handling Operations Regulations
- Control of Substances Hazardous to Health Regulations
- Personal Protective Equipment at Work Regulations
- Provision and Use of Work Equipment Regulations
- Workplace (Health, Safety and Welfare) Regulations
- The Health and Safety (Display Screen Equipment) Regulations
- Work at Height Regulations
- Electricity at Work Regulations
- The Construction (Health, Safety and Welfare) Regulations
- The Control of Asbestos Regulations

11.6 The risk assessment process will follow the Health & Safety Executive five step approach:

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 significant findings

Step 5 - Review your assessment and update if necessary

11.7 The following are definitions of key terminology used in risk assessment:

- **Hazard** – anything that can cause harm e.g., fire, chemicals, dusts, work at height, heat, electricity, lifting, noise, moving machinery parts, stress, violence etc.
- **Risk** – the chance, high or low, that someone may be harmed by a hazard. A person must be exposed to a hazard for any risk to exist.
- **Risk Control** – measures taken to eliminate the hazard / risk or, where this is not reasonably practicable, to reduce the likelihood of harm to an acceptable

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level. Risk control measures may take the form of elimination of the hazard or exposure to it, substitution of the hazard with a less hazardous alternative, revised working practices, engineering equipment, training, or, as a last resort, provision of Personal Protective Equipment (PPE).

11.7 Risk assessment templates can be found in the risk assessment library in the intranet.

11.8 The management of risk, both operational and strategic, which is not related to Health & Safety, will be carried out in line with Hanover's Risk Management Framework.

12 Data Protection

12.1 All data held will be in line with the Data Protection Framework and the Customer and Employee Privacy Policies.

13 Monitoring & Evaluation

13.1 The HSW Manager is responsible for organising, planning, implementing, reviewing, and measuring performance.

14 Reporting Requirements

14.1 A monthly health & safety report will be compiled by the HSW Manager for the SMT.

14.2 ELT and the Board will receive quarterly health, safety and wellbeing reports and an annual report.

14.3 ELT will receive investigation reports etc in line with the agreed accident & incident reporting of certain reporting categories and RIDDOR reportable accidents.

15 Review

15.1 This Framework will be fully reviewed every three years or earlier as required.