

HEALTH & SAFETY POLICY

1. Purpose

It is Red Kite Group's policy to ensure, as far as reasonably practicable, it operates and provides services in a way which prevents harm or injury to employees, tenants, leaseholders, contractors, visitors and members of the general public.

Our aim is to continuously review and make improvements when and where necessary to Health, Safety and Welfare standards and ensure that our statutory obligations as well as relevant legal and regulatory requirements are met. By the implementation of an effective Health and Safety policy, we aim to reduce near misses, injuries, ill health, unnecessary losses and liabilities. However, should an incident occur we are committed to investigating its cause to identify any failings in management control or negligence and where appropriate undertake actions to prevent reoccurrence.

Our staff are key to the effective implementation of this policy. To ensure employees in various pods and stems are kept up to date with health and safety issues, this statement of intent is widely displayed on noticeboards, provided to new employees during inductions and contained within the KnowledgeSphere for all employees to access. The Home Safety stem provides specific health and safety advice and technical guidance as required.

We are committed to providing relevant information, training and instruction to staff to allow them to carry out their roles safely. Identifying competence requirements for company activities and maintaining these competences through instruction, training and effective management. Responsibility for updating and managing policy content is delegated to the Home Safety Manager in consultation with Pod / Stem Managers. Advice on role specific and organisational training of personnel is coordinated by the Home Safety Manager using approved training suppliers and is supported by the Grow team. All employees have a duty of care for their own health and safety and that of others who may be affected by their actions. To this end, workplace hazards are identified, the risks assessed, and appropriate control measures implemented through the company risk assessments. All risk assessments are reviewed periodically, or when there is a significant change to a process, and incident or a change in legislation. Any changes are then approved and documented in the risk assessment register.

All managers and supervisors are responsible for ensuring that control measures are adhered to on a day-to-day basis. As part of these control measures, we provide suitable and sufficient Personal Protective Equipment (PPE) where required, and advice on how to use the equipment provided.

We aim to create a culture of co-operation between managers, employees and others who may be affected by the way we carry out our work. By fostering this culture, we strive to reach the highest standards in health and safety. We focus on continual improvement of our services for both our tenants and leaseholders through sharing lessons learnt internally and with relevant stakeholders. The Health and Safety Management Overview document ensures the effective control and communication of health and safety information and activities, and it provides a clear and concise approach, preventing ambiguity.

To ensure the implementation of this policy the Senior Leadership Team (SLT) manage financial and physical resources to deliver its aims. Health and safety performance information is reported to relevant committees and the Board regularly.

This policy will be reviewed annually or following any major incident or where changes to legislation, standards, organisation activities or risks associated occur. We provide opportunity for employees to have input into company processes and procedures, or raise any concerns, through regular consultation. This policy shall be communicated throughout the organisation in accordance with Internal Communications Strategy.

Signed: Susan Hickey

Interim Group Chief Executive

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Date: 26/06/25

2. References

2.1 This policy has been drafted in line with our vision and values, relevant legislation and best practice.

3. Organisational Background / Business Scope & Responsibilities

- 3.1 This is a Red Kite Group policy, encompassing Red Kite Community Housing and Twenty11 Homes Ltd. When the term 'we' or 'Red Kite' is used in this policy you should take it to mean Red Kite Group.
- 3.2 Chief Executive, Board of Directors and the Executive Leadership Team (ELT)
- 3.2.1 The Chief Executive, the Board of Directors and ELT are considered to be the health and safety policy maker(s). They are nominated to have responsibility for health and safety policy making and approval.

The designated health and safety lead for the organisation as required by the Social Housing (Regulation) Act is the Director of Property and Development who will fullfill the functions required by the Act. Their responsibilities include (but are not limited to):

- Monitor the organisation's compliance with health and safety requirements;
- Assess risks of failure to comply with health and safety requirements;
- Notify the responsible body of the organisation of
 - a) risks assessed under paragraph (b) of material failures by the organisation to comply with health and safety requirements;
 - b) material failures by the provider to comply with health and safety requirements;
- Provide advice to the responsible body as to how the organisation should address risks and failures notified to the responsible body
- Ensure that the organisation complies with health and safety requirements.
- Ensure compliance with statutory requirement, so far as it
 - c) relates to the health or safety of tenants, and
 - d) applies to the Red Kite Group by virtue of being a provider of housing

- Approving the general policy statement which forms part of the Health & Safety Policy.
- Maintaining a continuous review of health, safety and welfare standards and implementing improvements where these are identified as appropriate.
- Reacting to and assessing any significant change affecting staff, tenants and leaseholders and taking the necessary action to manage any crisis or major incident.
- Ensuring the necessary resources, both physical and financial are available to implement this policy
- Assigning responsibilities for planning, measuring, reviewing and auditing health and safety policy and procedures
- Specifying the structure for implementing policy and supporting relevant implementation plans
- Agreeing plans for improvement and reviewing progress to further develop the organisation's policy.
- Authorising new or revised policies, procedures and guidance which are developed and review/update as appropriate, allowing for change in legislation, as a result of an incident or in line with a statutory review period
- Implementing safe systems of work and business processes for the protection of employees, tenants, visitors, contractors and members of the public
- Promoting health and safety awareness at all levels of the organisation
- Ensuring that health and safety performance is regularly reviewed and forms part of monthly management information
- Ensuring that the statutory obligations, relevant legal and regulatory requirements are fully understood and implemented, reviewed and communicated
- Developing a culture for challenging unsafe behaviour to drive desired health and safety standards, that is encouraged by senior leaders and managers
- Implementing the use of the Plan, Do, Check, Act cycle as the general approach to delivering our health and safety management
- Dealing with significant breaches swiftly and effectively
- Promoting a positive health and safety culture to ensure the effective implementation of the policy
- Contribute to the Staff Partnership Forum, which acts as a group-wide, organisational health and safety committee for Staff related issues; the Audit & Risk Committee receives tenant and property related reports of risk.

3.3 Heads of Service

- 3.3.1 Heads of service are considered to be Health and Safety Planners and are directly accountable to the policy maker(s). They are responsible for producing detailed plans for their services to achieve corporate health and safety objectives. These responsibilities include (but are not limited to):
 - Ensuring the participation and involvement of employees in the effective implementation of the health and safety policy
 - Obtaining and co-ordinating specialist advice necessary for the effective planning and implementation of the policy

- Keeping up to date with health and safety legislation, standards and good practice relevant to the service that they lead
- Establishing management arrangements, risk control systems and safe systems of work and procedures
- Ensuring that health and safety objectives are an integral part of service delivery plans
- Ensuring the participation of employees in the planning process
- Implementing policy and reviewing regularly
- Taking an overview of specific management requirements for their Pods
- Reviewing performance and standards and escalating any issues as appropriate
- Promoting a positive health and safety culture to secure the effective implementation of the policy

3.4 Stem Leaders

- 3.4.1 Stem Leaders who act as line managers are considered to be health and safety implementers. They are also responsible for the implementation of health and safety policies, plans and procedures. Their responsibilities include (but are not limited to):
 - The management and supervision of necessary resources and information for those carrying out the work
 - Periodic feedback to senior management / line manager on performance including successes and failures, deficiencies in plans, standards and procedures and systems
 - Communicating key messages and relevant information in regards to health and safety practice and procedures.
 - Promoting a strong culture of health and safety awareness

3.5 Health and Safety Assistance

- 3.5.1 Red Kite employs a Health and Safety Manager who provides health and safety advice and assistance to the business and acts as the 'competent person'. Their responsibilities and key tasks include:
 - Supporting the formulation and development of health and safety policies
 - Promoting a positive health and safely culture to ensure the effective implementation of the policy
 - Planning for health and safety including assisting in the setting of objectives and deciding priorities
 - Identifying hazards, assessing risks and identifying suitable means of control
 - Implementing plans, the overarching health and safety management approach and monitoring control measures
 - Reviewing performance and auditing of health and safety management systems
 - Interpreting health and safety law and its implication
 - Assisting in the establishment and maintenance of risk control standards
 - Maintaining procedures for recording, reporting, investigating and analysis of accidents, incidents and cases of ill health

- Establishing and maintaining adequate appropriate active monitoring and auditing systems
- Promoting proactive health and safety initiatives including focusing on areas of best practice
- Establishing networks to ensure the provision of advice from subject matter experts, both internally and outside the organisation
- Completing and ensuring risk assessments, method statements and safe systems of work are in place for relevant activities
- Reviewing changes to health and safety legislation/standards and recommending change were appropriate
- Promoting improvement activity
- Engaging with tenant groups and promoting tenant safety champions within the community

3.6 All Staff

3.6.1 All members of staff are responsible for:

- Taking care of themselves and others who may be affected by their acts or omissions at work
- Co-operating with others to enable them to perform and comply with their duties or requirements imposed on them by the Health and Safety Policy
- Taking care not to intentionally or recklessly interfere with or misuse anything that has been provided for the purpose of health, safety and welfare
- Using machinery, equipment, substances, transport equipment or safety devices in conformity with the training and instruction provided
- Notifying their line manager of any work situation having the potential for serious or imminent danger to health and safety
- Reporting any accident or near miss however minor, to the Health & Safety Manager for investigation
- Setting a personal example to their colleagues in all aspects of health and safety

3.7 Staff Partnership Forum (SPF) - Staff Representative

3.7.1 Staff representatives which make up the forum will convey issues from the workforce to various levels of management within Red Kite. SPF meet quarterly and acts as the Health and Safety Committee for staff related issues within the organisation, any health and safety issues that are raised during the meeting are noted and actioned.

4. General Health & Safety (H&S) Arrangements

4.1 The Audit and Risk Committee will have reports raised to them for building or tenant related issues. The committee meet quarterly and acts as the Health and Safety Committee for building and tenant related issues within the organisation, any health and safety issues that are raised during the meeting are noted and any learning outcomes agreed.

- 4.2 It is the responsibility of the employer to ensure there are suitable arrangements in place for the health, safety and wellbeing of staff when engaged in work activities or while at places of work as required by the Health and Safety at Work Act 1974.
- 4.3 The Health and Safety Management Overview document ensures effective control and communication of health and safety information and activities. It details the required tasks to be undertaken, while providing a clear and concise approach preventing ambiguity and defining accountabilities. There is an associated library of formally documented procedures to ensure control, co-operation, effective communication and building competence.

5. Document Control

5.1 To ensure that documentation is developed to a consistent standard, documents are produced in accordance with the "Document Control" procedure and documents held are listed in a document register. Policy documents are controlled in a consistent manner throughout the organisation a "Guide to Drafting and Approving Policies" is available on the KnowledgeSphere.

6. Supervision

- 6.1 Staff are allocated a line manager who is responsible for making the necessary arrangements for the day-to-day supervision of their activities. Arrangements vary depending on the needs of the individual such as qualifications and experience, and nature of the risk associated with the work being undertaken.
- 6.2 Staff often work remotely, and it is the manager's responsibility to ensure that regular contact is made, and a means of communication and reporting established to ensure staff receive sufficient guidance and support.
- 6.3 Staff undergo a period of induction during the first few weeks of employment. As part of this process, training needs, additional supervision and/or coaching requirements are identified. On the job coaching and training by managers and experienced staff, offers an effective way of ensuring staff have the necessary knowledge and skills for the tasks they undertake. Formal advice, guidance and information are shared in relation to health and safety activity as part of the induction process.
- 6.4 The level of supervision and control requirements for carrying out tasks are identified in the relevant risk assessments. The required statutory and relevant training requirements are also identified. The staff one-to-one system in place is used to assess staff to ensure they receive the necessary training to safely carry out tasks. Consideration is taken of any changes made to a person's role or responsibilities, or tasks they undertake as part of taking on any new task or activity.

7. Communication, Participation and Consultation

7.1 To comply with the Safety (Consultation with Employees) Regulations 1996, Red Kite has a Staff Partnership Forum (SPF) - the <u>SPF constitution</u> can be found on KnowledgeSphere. The Communication Strategy in place details how Red Kite communicates and consults with tenants, leaseholders, visitors and the public.

- 7.2 The feedback and general communications structure includes the Whistleblowing Policy which gives employees a system to raise concerns. Effective communication relies on information coming into, flowing within and going out of Red Kite.
- 7.3 It is essential that systems are in place to effectively gather information from within Red Kite and act on it when required. To ensure communication generated is in a suitable format so that it can be understood by those receiving it, documentation is produced in accordance with:
 - Style Guide
 - Consultation with our tenants and leaseholders
 - Arrangements and guidance for external correspondence
 - Communications Strategy
- 7.4 To ensure that Red Kite is kept up to date with health and safety information the Competent Person reviews HSE Newsletters and other trade publications. To show compliance with legislation Red Kite holds a register of relevant legislation. Regular legal updates are also circulated by our legal advisors.
- 7.5 The Health and Safety Manager liaises with groups and individuals, obtaining feedback, sharing advice but more importantly ensuring that our tenants are heard, and any concerns acted upon. The role helps develop and maintain a framework of effective communication with our tenants ensuring higher risk building occupants fully understand safety implications and guidance.

8. Information, Training and Competence

8.1 It is important that employees are given the information to undertake their tasks safely and that they have the competence to undertake specific roles, this is achieved through regular information, instruction and training. There is a dedicated health and safety page on the Red Kite intranet, on our website and detailed information kept on KnowledgeSphere.

9. Planning

- 9.1 Planning is a key activity in the process of carrying out policy implementation to effect and achieve risk control. Good planning enables Red Kite to anticipate the need for action and to prioritise and to justify the resource necessary to meet particular needs. It is important that any plan provides the opportunity for involvement, communication and co-operation, thereby promoting the commitment to shared goals which is essential to a strong safety culture.
- 9.2 There are two categories of planning:
 - Corporate planning: establishing and maintaining the policy, organisation and culture necessary for effective risk control
 - Operational planning: assessment of risks arising from activities and the establishment and maintenance of control measures

10. Corporate Planning

10.1 Corporate planning is undertaken as part of the annual review process by the Board of Directors or following any major incident/crisis.

11. Operational Planning

- 11.1 Operational planning is undertaken to establish the relative importance of hazards arising from inputs, activities and outputs, so that priorities can be established.
- 11.2 The Management of Health and Safety at Work Regulations 1999 requires that a systematic and competent approach be taken with regard to risk assessment. Activities are analysed to identify probability of the hazard being realised and the harm experienced if the hazard is experienced, this is known as risk. A score is calculated for the raw risk. This is then reviewed, and control measures identified to reduce or if possible, eliminate the risk. The risk calculation is then repeated considering the control measures. A risk assessment is produced to demonstrate the controls required to manage the risk. Risk assessments are reviewed periodically (or when there is significant change) and influence the objectives, priorities and resource requirements of the Corporate Journey.
- 11.3 The control measures necessary in particular circumstances depend on the recognition of the hazard, the likelihood of the hazard becoming a risk and the consequence should it occur. They vary from simple workplace controls to more extensive measures requiring improvements in organisation, planning, supervision, training etc. The risk assessment process is central to operational planning to focus resources on activities that involve the greatest risk of serious injury or ill health.

12. Occupational Health

- 12.1 From a preventative standpoint, Occupational Health is concerned with ensuring that work activities do not lead to chronic health conditions that may not be symptomatic immediately. This applies to the assessment of risk from:
 - Health and Wellbeing including the management of chronic illnesses
 - Hazardous chemicals which if inhaled, ingested or come into contact with the skin may cause occupational ill health including exposure to microbiological agents that could lead to infection
 - Noise levels which may cause deafness or other related disorders
 - Ionising or non-ionising radiation which may cause burns, sickness or cancer
 - Stress which may cause mental or physical illness
 - Extremes of temperature, pressure or humidity
 - Strains, pains or sprains associated with awkward body postures or repetitive movements or the application of excessive forces (manual handling)
 - Pains and muscle aches due to the use of display screen equipment
 - Special circumstances which may affect a pregnant person or nursing mother
 - Special circumstances which may affect a younger worker
 - Alcohol, smoking, drugs and other substances

12.2 In certain circumstances we will utilise our occupational health provider to offer support and advice to an employee who has been injured or unwell for some time. The occupational health provider also produces a report that suggests appropriate adjustments to help the employee avoid further injury.

13. Management of Contractors

13.1 The document Procurement & Contract Management Procedures describes how the Red Kite group ensures that contractors employed undertake work in a safe way and to a high standard.

14. Control of Emergency Situations

14.1 The <u>Incident Management Centre</u> details the actions to be taken by the Red Kite staff in the event of an emergency including personal injury (first aid), fire, terror attack, flooding and accidental release of a hazardous substance.

15. Lone Working and Avoiding Violence at Work

- 15.1 Lone workers are persons who work alone without a colleague or colleagues. The definition does not include persons who are temporally out of contact while carrying out a short duration tolerable risk level task. Lone working tasks are controlled by risk assessment in accordance with the Lone Worker Policy.
- 15.2 Violence or aggression is any behaviour which physically or emotionally harms another. It may be physical involving hitting, spitting, pinching, pushing etc., or emotional involving shouting, gestures, crowding, eye contact or swearing. Safe systems of work are implemented, training provided and control measures described in the Lone Worker Procedure to mitigate risks. However, should an individual experience a negative situation they will be provided tailored support via the Occupational Health provider. A flagging system is operated to highlight the potential of risks to staff.

16. Occupational Driving

16.1 All members of staff using a vehicle for work purposes will do so in accordance with the Occupational Driving Policy.

17. Working at height

- 17.1 Red Kite recognises the risks associated with working at height and is committed to implementing effective control measures to prevent falls and injuries. All work at height will be planned, risk assessed and carried out using appropriate safe systems of work.
- 17.2 Employees required to work at height must receive relevant training and use suitable Personal Protective Equipment (PPE) as identified in the risk assessment. Managers/Health and Safety Manager are responsible for ensuring compliance with these requirements and for monitoring the effectiveness of the control measures.

18. Accidents

18.1 The reporting of accidents, incidents and near misses are investigated in accordance with the Reporting Accidents, Incidents and Near Miss policy.

19. Measuring Performance

19.1 To monitor performance within Red Kite a mix of active and reactive monitoring techniques are used. Red Kite develop and implement procedures to monitor and measure the key characteristics of services that can have a significant impact on health and safety. Relevant information is recorded to monitor the organisation's performance, effectiveness of operational controls and conformance with relevant objectives and targets set by the business.

19.2 Active Monitoring

- 19.2.1 Active monitoring systems draw attention to deficiencies in health and safety management and allocation of remedial action prior to accidents or the onset of ill health. The active monitoring and measurement of our processes shall be achieved through (but is not limited to):
 - Site inspections
 - Monitoring the achievement of health and safety objectives
 - Audits
 - Staff performance appraisals
 - Monitoring the reports of accidents, incidents or near misses
- 19.2.2 These disciplines shall be used to demonstrate the ability of our key processes to achieve planned results. When planned results are not achieved, appropriate and suitable corrective actions shall be implemented to ensure conformity. Where required reviews of the existing safe systems of work and relevant procedures will be undertaken and amendments made as required.
- 19.2.3 Safety tours are carried out by senior management to encourage two-way communications and to engage with our core team personnel. Site inspection / audit documentation shall constitute part of Red Kite's suite of records which forms part of the Health and Safety Management System.

19.3 Reactive Monitoring

- 19.3.1 Red Kite records a range of data to feed into reactive monitoring including:
 - Actual or potential accidents
 - Cases of ill health
 - Near misses or other loss causing incidents
 - Whistleblowing or general feedback
- 19.3.2 All of these are investigated to identify effective correction action and prevent reoccurrence.

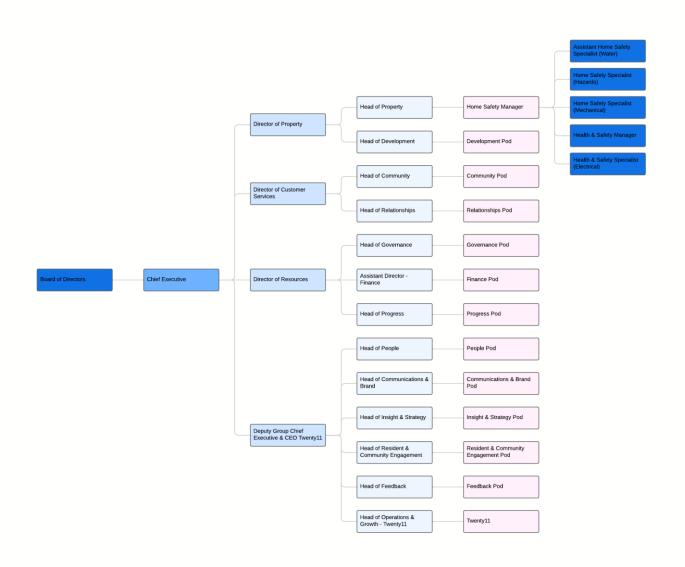
19.4 Audit and Review

- 19.4.1 Red Kite is committed to continual improvement, Information from incidents, monitoring and auditing processes is used to measure and review performance and identify areas for improvement.
- 19.4.2 This information is included in regular reports made to the ELT and the Board showing compliance with or progress towards the health and safety objectives and targets.
- 19.4.3 Red Kite annually reviews its priorities, key performance indicators and targets in relation to the management of health and safety. An annual report for the Board is produced detailing achievements, performance and priorities for improvement.

20. Equality and diversity

- 20.1 Red Kite is committed to ensuring that all staff, tenants, contractors, visitors, and stakeholders are treated fairly and equitably. Health and safety procedures will be applied in a way that eliminates discrimination, harassment, or victimisation, and reasonable adjustments will be made to support individuals with diverse needs.
- 20.2 All employees have a responsibility to promote equality and inclusion in the workplace and when delivering services. Training, guidance, and support will be provided to ensure staff understand their responsibilities under the Equality Act 2010 and the Public Sector Equality Duty (*include the legislation within the legislation section).

21. Appendix 1 - Organisation chart - health and safety responsibilities



Document Controls						
Version	10	Effective date	September 2025			
Subject matter expert drafter	Health & Safety Manager	Policy owner	Head of Property			
Related pod	Property	Related policy	All Policies			
Review period	12 months	Next review due by	September 2026			
Red Kite Group policy, including Twenty11						
The 3 lines of defence have been checked and are valid						

Equality Impact Assessment completed					
Publish on website					
Delegated approvals					
Approved by ELT	Nick Burston, Director of Property and Development	Approved Date	27/06/2025		
Approved by	Yes	Approved Date	08/09/2025		
Approved by	Diana Green, OPATS Chair	Approved Date	16/09/2025		
Approved by	Yes	Approved Date	03/09/2025		