

Health and Safety Policy

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TWO RIVERS HOUSING

Health and Safety Policy

1. Statement of Intent

- 1.1 Two Rivers Housing (TRH) is committed to taking all reasonable steps to ensure the health, safety and welfare of colleagues, customers, contractors, and others who may be affected by our business activities and undertakings in accordance with the Health and Safety at Work Act 1974 and other supporting current legislation.
- 1.2 We will provide information, instruction, training, supervision, and support as necessary, to ensure that colleagues are aware of their duties and responsibilities in line with legislation and to ensure the implementation of this policy.
- 1.3 We will take a risk-based approach to our health and safety obligations, prioritising resources for significant hazards and associated risks, with all colleagues having responsibility to work safely, and towards an exemplary safety culture.
- 1.4 We will ensure sufficient resources, financial and non-financial, are provided to meet our obligations under health and safety legislation.
- 1.5 Our general intentions are:
- To encourage and create a positive environment which promotes health, safety, and wellbeing.
 - To provide adequate control of hazards and associated risks to colleagues, contractors, tenants and anyone who may be affected by our undertakings.
 - To consult with colleagues, partners and customers on matters affecting their health and safety
 - To provide and maintain safe premises, tools and work equipment.
 - To ensure the safe handling and use of substances used through our work activities.
 - To provide adequate information, instruction, training, and supervision for colleagues
 - To conduct regular safety audits to measure performance and identify areas for improvement.
 - To maintain safe and healthy working environment
 - To review and revise this policy at regular intervals.
- 1.6 The successful implementation of this policy aims to reduce injuries and ill-health, protect the environment and reducing any unnecessary loss, reducing the groups liabilities and reducing instances of wasted resources.

Signed:



Kevin Bennett Chief Executive Officer

May 2026

2. General Policy Details

2.1 Purpose

This policy sets out TRH's commitment to the management of health and safety; it outlines the arrangements of how we will comply with our legal obligations and aim to meet the highest standards and best practice in our endeavours. The Health, Safety and Wellbeing of our colleagues, tenants and anyone who may be affected by our undertakings, is paramount.

TRH recognises that everyone has health and safety responsibilities, both for themselves and others. This policy is the foundation for how these responsibilities are to be effectively put into practice.

2.2 Scope

This document describes TRH's policy in relation to how it will manage the health and safety of colleagues, tenants and others who are affected by our activities. It lays out how we plan to provide a safe and healthy environment and aim for 'zero harm'. This policy applies to all colleagues and contractors.

2.3 Legislation

This policy meets the requirement under section 2 (3) Health and Safety at Work Act 1974 and other supporting current regulations including but not limited to The Management of Health and Safety Regulations 1999.

3. Roles and Responsibilities

3.1 Board

The TRH Board will:

- Ensure that there are suitable health and safety arrangements in place, around compliance with relevant legislation and regulations as an employer and landlord.
- The Board will monitor health and safety performance for assurance that these responsibilities are met.
- Seek competent support and advice on matters of health and safety.
- Undertake training necessary to ensure it has the required skills to seek assurance in these areas.
- Review and seek assurance on TRH's health and safety performance and performance in relation to TRH's landlord health, safety and compliance responsibilities.
- Approve the Health and Safety Policy
- Ensure that our tenant's voices on matters of health and safety are heard.

3.2 Chief Executive Officer

The CEO has overall responsibility for health and safety. The Assistant CEO has responsibility for chairing the Health and Safety Forum quarterly meeting.

They will ensure:

- An up-to-date health and safety policy is in place and is subject to periodic review to ensure that it meets the requirements of legislation and regulations.
- Appoint competent persons to assist in enabling TRH to meet their obligations.
- Appoint a competent director who is responsible for health and safety.
- Positively promote health and safety in all activities undertaken
- Ensure that our tenants' voices are heard particularly relation to matters of health and safety and in line with the new regulatory framework of the consumer standards.
- TRH notify our Board and the Regulator, as appropriate, of serious breaches of Health and Safety

3.3 Executive Leadership Team

Comprising: Executive Directors and Assistant Directors

The Deputy Chief Executive has lead responsibility for Health & Safety. The Executive Leadership Team will be responsible for the leadership within TRH. In particular:

- Establishing plans to implement polices and integrating these into the general activities of the organisation.
- Assigning responsibilities for organising, planning, implementing, measuring, reviewing and auditing health and safety policies and procedures
- Agreeing plans for the improvement, and reviewing progress on the development of the organisation and the policy
- Providing adequate resources to manage health and safety, including the provision of expert advice
- Ensuring health and safety performance is regularly reviewed.
- Ensuring the effectiveness of the Health and Safety Forum
- Delivering effective health and safety leadership and creating a health and safety culture throughout the organisation
- Appointing one of its members to be the director responsible for health and safety
- Include details of health and safety performance in the annual report.
- Review and seek assurance on TRH's health and safety performance, and performance in relation to our landlord health, safety and compliance responsibilities.

- Ensure that our tenants' voices are heard on matters of health and safety.

3.4 Head of Health and Safety

The Head of Health and Safety shall provide competent advice to the business in accordance with regulation 7 of the Management of Health and Safety at Work Regulations 1999. They shall also act as the 'critical friend' to the business, providing assurance and direction of matters of health and safety. They will:

- Provide advice and guidance on matters pertinent to health and safety when requested
- Offer advice in line with legislative change and collaborate with stakeholders in the implementation of such changes.
- Review safety critical policies and procedures ensuring a streamlined and pragmatic approach.
- Demonstrate strong health and safety leadership and ensure ownership is maintained at a local level.
- Ensure health and safety matters are promoted positively without confusion.
- Measure the safety climate of the business and take a risk-based approach to health and safety intervention.
- Engage with the business to offer support and deliver Health & Safety solutions where necessary.
- Undertake thematic reviews and preventative work to improve safety management
- Undertake ad hoc site inspections to establish that high standards of site safety are being observed.
- Carry out Construction Design and Management (CDM) regulation checks to ensure all parts of the CDM process are being carried out appropriately.
- Deliver toolbox talks and staff briefings on health and safety.
- Work with managers in creating a health and safety training plan.
- Maintain, and further develop as required, the safety management system.
- Service relevant safety committees and report to boards.
- Make statutory reports on behalf of the business.
- Ensure safety training is fit for purpose.
- Lead on major accident and H&S internal investigations
- Liaison as necessary and appropriate with the Health & Safety Executive, following consultation with the Chief Executive
- Have the authority to request information pertinent to health and safety from the business.
- Recommend changes to health and safety policies and procedures for approval by relevant committees and groups.

- Ensure regular reporting to Boards and Committees so as to enable them to assess the effectiveness of our health and safety management system, with reports containing a mixture of lead and lag indicators of health and safety performance
- Develop and deliver an annual health and safety communications plan addressed to both colleagues and tenants with the aim of raising awareness of health and safety risks and how to reduce them.

3.5 Assistant Director of People and OD

The Assistant Director of People and OD will:

Hold overall responsibility for training across the organisation.

Ensure robust training frameworks are in place to maintain competency across all roles in the organisation.

Collaborate with the Health and Safety team to ensure training content remains current and aligned with legislation, best practise, and organisational risk.

Promote a culture of continuous learning encouraging staff engagement in health and safety training and professional development.

Monitor training compliance levels and ensure timely escalation where gaps or overdue training are identified.

3.6 Senior Managers

The Senior Manager Group (SMG) will be responsible for the organisation and planning regarding health and safety in areas of their control. This includes the management of consultants, contractors, tenants, temporary and agency staff, and all persons effected by TRH's work activities. Specifically, they will:

- Organise and plan the health and safety arrangements for the business.
- Establish management arrangements, risk control systems, and safe systems of work with operating practices, and to review them on a regular basis, or when changes occur
- Ensure, through corporate and operational planning, that health and safety objectives are an integral part of TRH business plans.
- Keep up to date with changes in relevant health and safety law, standards and good practice.
- Ensure the active participation, involvement, compliance and consultation with all employees in the management and planning of health and safety.
- Ensure that all colleagues receive health and safety training and induction, commensurate with their work activities, and that this training is refreshed at appropriate intervals.
- Participate in the investigation of accidents as required, and to ensure that remedial action is carried out, lessons are learnt and proactive improvements are put in place.

- Ensure all health and safety risks identified and high risks are included in the relevant risk registers.
- Ensure managers comply with their responsibilities detailed in this policy and carry out their duties accordingly.
- Ensure that competent specialist advice is taken as necessary.
- Ensure that health and safety issues are included within the agendas of appropriate meetings to ensure discussion and resolution.

3.7 Health & Safety Forum

The Health and Safety Forum acts as the representative body for consultation, review and monitoring of matters of health, safety, and compliance. The forum receives, reviews, and scrutinises reports and information and makes recommendations, where necessary for improvements. Membership comprises of CEO, members of Senior Leadership Team, Senior Managers Group frontline managers and operational colleagues. The forum will:

- Ensure health and safety policy and safe systems of work are fit for purpose and consistently implemented throughout the business.
- Monitor the implementation of the health and safety policy and safe systems of work.
- Check progress and monitor the risk assessment program, health and safety initiatives, audits and inspections and actions arising from these.
- Take steps to understand the requirements of colleagues and as a result define the requirements for, and monitor the delivery of, health and safety training.
- Review health and safety aspects of new initiatives and approve changes to health and safety procedures and guidance.
- Consider the effects of new health and safety legislation, enforcing authority reports and information releases.
- Review accidents, incidents, dangerous occurrences and near misses and make recommendations to ensure the health and safety of colleagues is maintained and provide wider assurance to the Executive, Assistant Directors and Board that these reviews have taken place robustly and corrective actions implemented as appropriate.
- Have oversight, help remove any barriers and report back to Senior Leadership Team
- Ensure that our tenants' voices on matters of health and safety are heard.
- Review and seek assurance on TRH's occupational health and safety performance and performance in relation to TRH's landlord health, safety and compliance responsibilities.
- Put in place a Terms of Reference for the Forum and regularly review the Forums scope and responsibility.

3.8 Front Line Managers & Team Leaders

TRH's frontline managers, team leaders, and other colleagues formally recognised as deputising in their absence, have responsibility for implementing adequate health and safety arrangements for colleagues and tenants on a day-to-day basis. They are responsible for ensuring the health, safety and wellbeing of colleagues and all those effected by TRH's work activities. They are also responsible for ensuring compliance with Health and Safety regulations with regard to building being managed by them.

They will:

- Implement operational plans, management arrangements and safety controls.
- Managers are responsible for actively promoting and embedding a positive health and safety culture within their teams, ensuring safe working practices are consistently understood, applied, and reinforced.
- Deploy resources and information to ensure all activities are carried out safely.
- Provide timely feedback to line management on performance, including successes and failure, and any deficiencies in plans, arrangements, systems or precautions relating to safety.
- Ensure that safety relevant defects are reported appropriately and rectified in a timely manner.
- Ensure that health and safety risks are managed on-site in conjunction with surveyors and contract managers until the defect is rectified.
- Communicate with colleagues and ensure the participation of colleagues, contractors and tenants (as appropriate) in health and safety activities.
- Implement the health and safety policy and associated procedures within premises under their control.
- Ensure the delivery of appropriate health and safety training in induction to their colleagues and communicate safety messages to relevant parties in an effective and timely manner.
- Ensure the details of all work-related accidents, near misses, dangerous occurrences and occupational diseases are reported to the health & safety team in the prescribed manner as soon as practical after the event.
- Ensure that all risks are identified that all risk assessments are undertaken, reviewed and that relevant people are aware of the control measures in place.
- Make sure that all risk and needs assessments are undertaken for tenants, giving due consideration to risks identified through the workplace risk assessment process (fire, fall from height, hot water etc.)

Implement control measures and produce any necessary safe systems of work, along with adequate supervision and instructions, to ensure tasks are conducted safely.

- Notify line management about any hazards, accidents or known medical conditions of their colleagues.

- Stop any dangerous activity observed and take action to establish a safe system of work.
- Ensure that when identified through risk assessment, personal protective equipment is provided to colleagues and that a system for managing the equipment is adopted.
- Promote health and safety awareness amongst colleagues (and tenants as appropriate)
- Make sure regular inspections are undertaken so that premises, PPE and work equipment provided are in use are safe and in good order.
- Develop and maintain emergency response and business recovery plans.
- Maintain and implement procedures for colleagues working away from the office, including lone working, work on construction sites and in empty properties, driving whilst at work, working from home and working in other locations.
- Frontline Managers and Team Leaders should liaise with the Health & Safety Team and seek advice on health and safety issues as required.

3.9 Employees

Front line colleagues are integral to TRH's safety culture. TRH will ensure that colleagues have the necessary equipment, information, instruction and training to ensure the health safety and wellbeing of themselves and others around them. All Colleagues will:

- Cooperate with managers, complete required training and follow TRH health and safety policies and procedures.
- Take reasonable care of their own health and safety, and that of others who may be affected by their acts or omissions.
- Notify line management of any hazards identified or malfunctioning work equipment.
- Report any accidents and incidents.
- Report any medical condition that could affect others at work, or their ability to conduct their own work safely.
- Understand and follow specific policies, procedures and safety systems of work designed for the task being performed.
- Wear appropriate safety equipment and use safety devices.
- Not interfere with, or misuse anything provided in the interests of health and safety.
- Raise any matters of concern about health and safety to their immediate manager.

3.10 Technical Specialists

It is recognised that some job roles require technical specialists. Areas of work include but are not limited to the management of CDM, fire safety, asbestos, gas, electricity, water management, lifting equipment and the management of damp and mould in homes. Each technical specialist has responsibility for health and safety in relation to the design and management of projects and work streams under their control including implementing adequate day to day health and safety arrangements during the course of the work.

They are responsible for the design of safe working systems and the health and safety of residents, contractors, tradespersons and others who come into contact with ongoing projects. They are also responsible for ensuring compliance with all relevant health and safety regulations, supporting guidance and compliance with this policy and associated procedures.

All technical staff will be suitably qualified, competent and have an awareness of health and safety and regulations relevant to their areas of responsibility.

Specifically, these responsibilities are to:

- Ensure that all risks in regard to projects or work streams are identified.
- Implement control measures and produce any necessary safe systems of work along with adequate supervision and instructions to ensure projects/work streams are conducted safely.
- Notify line management about any accidents, hazards or health and safety concerns in relation to projects/work streams.
- Report all accidents and incidents to the health and safety team.
- Stop any dangerous activity observed and take action to establish a safe system of work.
- Work toward rectifying any hazards identified during the course of the work or post completion.
- Ensure health and safety performance by contractors is one of the measured performances KPI's.
- Ensure adequate arrangements are established to review contractor performance.
- Co-ordinate work as required with any appointed external technical specialist.
- Each external specialist will be assessed for competence in safety via the contract management process.

3.11 Tenant Engagement

Our tenant engagement work is fundamental in ensuring that our tenants' voices are heard. Tenants from a wide range of backgrounds, will be routinely involved through our engagement arrangements to provide input and scrutiny on health & safety matters, including for example, policy development. Tenant input into driving forward our Health & Safety agenda will be achieved on both an informal and formal basis, ensuring a broad range of views and opinions are heard and acted on.

4. Arrangements

4.1 H&S Management system

Management of health and safety is based on HSE guidance document HSG 65 and follows the recognised principles: Plan – Do – Check – Act.

4.2 Plan

- Policies and procedures are established by the business and are approved via the Senior Leadership Group and Health and Safety Team to ensure compliance with the law, and best practice.
- Structures and arrangements are in place to ensure that communication throughout the business is appropriate and that safety is at the forefront of what we do.
- Performance standards are set by the Senior Leadership Group and communicated via the Health & Safety Forum and Senior Manager Group

4.3 Do

- Risk is identified in the business and controls are put in place to limit those risks to a suitable level. Colleagues 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, financial and non-financial to ensure the plan is enacted appropriately.

4.4 Check

- A variety of lag and leading indicators are used to check the effectiveness of our safety management.
- Self-audit and internal audit are both used to verify our practices and suggest areas for improvement. TRH are committed to investigating accidents, near misses and cases of occupational disease in order to improve the health, safety and wellbeing of our colleagues.

4.5 Act

- TRH will learn from mistakes and take action to prevent reoccurrence of any accidents.
- Performance will be reviewed regularly, in light of change in law or circumstances.

The results of performance measures will be acted upon in a proportionate risk-based manner.

5. Policies

- ### **5.1**
- TRH produces detailed health and safety policies and procedures on key risk areas. These are typically identified as corporate health and safety (employer / employee) policies and procedures, and landlord compliance policies and procedures. These documents are reviewed and owned by the most relevant subject matter expert.

People managers are responsible for familiarising themselves and their teams with these policies and procedures, and for their successful implementation. All policies and procedures will be subject to periodic review and amended as necessary. These reviews will be led by the Health & Safety team with consultation and collaboration from across the business.

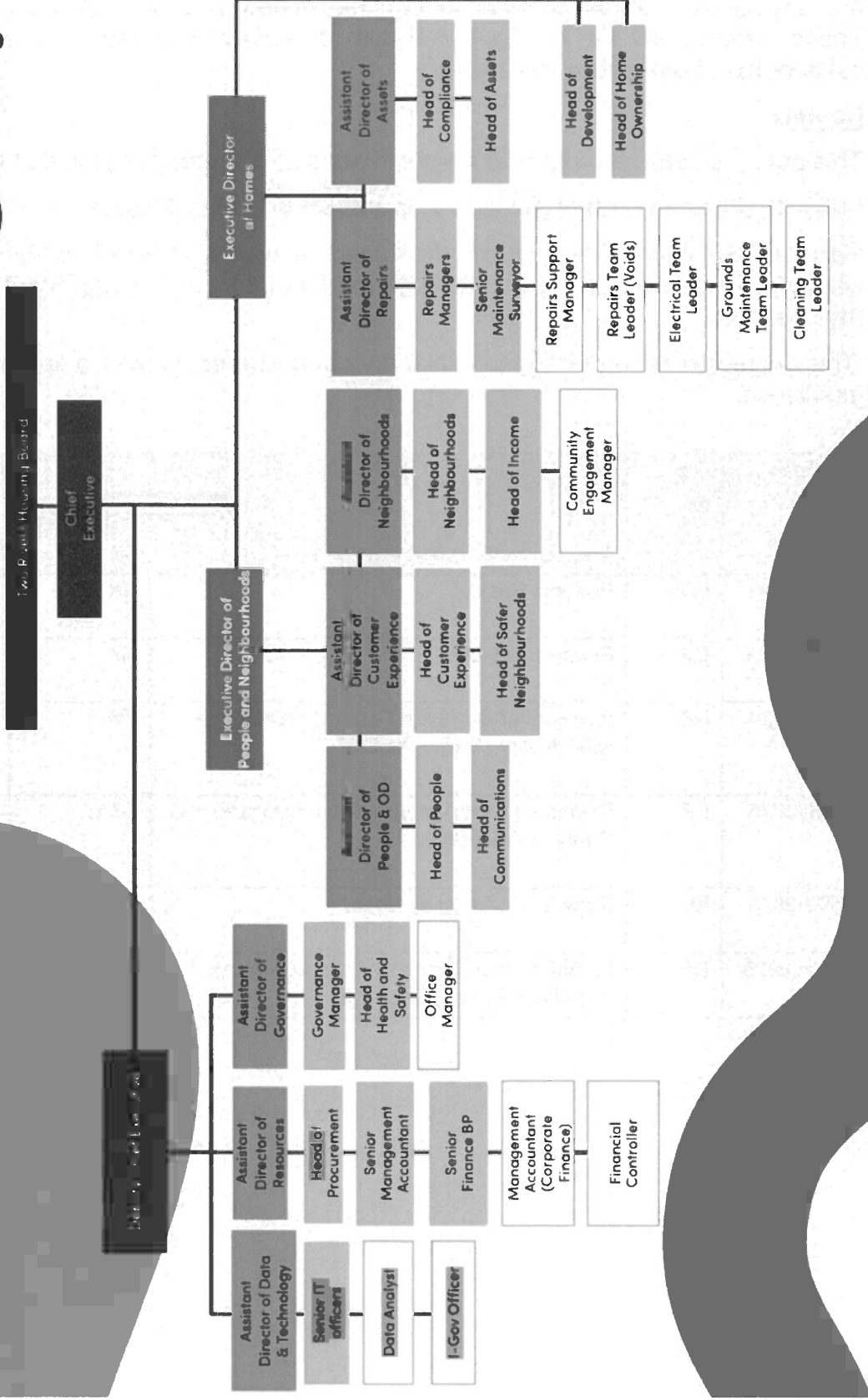
6. Review

- 6.1 This policy is subject to periodic review in accordance with the details at 6.2 & 6.3.
- 6.2 Policy Statement of Intent (Section 1) is subject to Annual Review
- 6.3 General Health and Safety Policy is subject to review at three yearly intervals or before in the event of a significant H&S incident or if there are significant changes in the business.

This document will remain valid until a reviewed revised version is approved and published.

Version	Date	Author	Change description	Approved by	Date approved
3.0	05/10/2022	GK	Periodic Review	GK	05/10/22
3.1	26/10/2023	GK	Periodic Review	GK	26/10/23
3.2	01/02/2024	HS	Removal of Garry King's name replacing it with Hayley Selway. As CEO	HS	01/02/24
3.3	04/02/2025	KB	Rewrite to represent new Exec Structure and Centigen Integration	E&AD	04/02/2025
4.0	06/03/2025	KB	Rewrite approved by Board.	Board	06/03/2025
4.1	March 2026	DR	Additional wording around responsibilities and change to org structure	Board	March 2026

Our structure



Responsible Officer: Deputy Chief Executive
 Author: H&S Manager

Last reviewed: March 2026
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