



HEALTH, SAFETY AND EMERGENCY CONTROL POLICY 2018-2021

1.0 Introduction

This is Nottingham City Homes' Group Health, Safety and Emergency Control Policy [HSEC Policy]. The purpose of this policy is to identify how health and safety, fire safety and emergency control affect the work that we do, make clear who is responsible for what, and describe how we intend to manage and improve our activities in these areas. Health and safety, fire safety and emergency control are also addressed in separate management systems and reference should be made to these documents where necessary.

This is a Nottingham City Homes Group policy and its contents apply to any subsidiary company within the Nottingham City Homes Group, incorporating but not exclusive to Nottingham City Homes Registered Provider Limited and Nottingham City Homes Enterprises Limited (NCH Enterprises). Any reference in this policy to 'the Group', 'the Company', 'Organisation', 'We', 'Our' and 'Us' refers to the Nottingham City Homes Group, unless otherwise stated.

The [law](#) requires that an organisation of our size has a written health and safety policy, and dictates to some extent the format and content of the policy. As fire safety and business continuity are crosscutting issues they have also been incorporated. This policy has been prepared to comply with the law and will also help NCH managers to identify and manage risks within their own service areas.

We are certified to BS OHSAS 18001, which requires the implementation and maintenance of a health and safety management system that results in continual health and safety performance improvements. The standard is based on a plan-do-check-act model, which is similar to that in PAS7 (fire risk management systems - specification) and ISO 22301 (business continuity management systems - requirements).

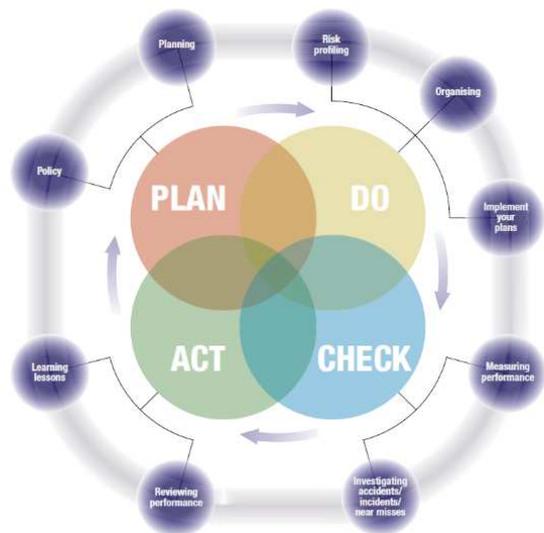


Figure 1: Plan-Do-Check-Act model

The individual management arrangements are described separately in the following documents:

- HS01 Health and Safety Management System
- FS01 Fire Risk Management System
- EC01 Emergency Control Management System

This policy is developed alongside our Corporate Plan, and remains in force for the same period as that plan (2018-21). It contains our health and safety, fire safety and emergency control objectives for that period, although any of these objectives are subject to change following Board decisions depending on our circumstances, including changes in policy, legislation or financial arrangements.

Regulation of health and safety at work - The main features of our approach

In conjunction with NCH management, the NCH Risk Management Team will use a range and mixture of techniques at various stages to promote and embed management systems and procedures referenced in this policy to improve the management of risks. The main ones are:

- influencing and engaging with stakeholders
- influencing larger and higher risk sections
- risk assessment
- creating knowledge and awareness of health and safety, fire safety and business continuity risks and encouraging behaviour change
- promoting a proportionate and sensible approach to health and safety, fire safety and business continuity
- inspection and audit
- investigation
- support
- engaging with the workforce
- working with regulators, enforcing authorities and other agencies.

The illustration in figure 1 below explains when these techniques will typically be employed.

Before and at the point risk is created	At and during exposure to risk	Consequence of exposure to risk has occurred
Influencing and engaging with stakeholders		
Influencing larger and higher risk sections		
Risk assessment		
Creating awareness of health and safety risks and encouraging behaviour change		
Promoting a proportionate and sensible approach to health and safety		
	Inspections and audits	Investigation
Support		
Engaging with the workforce		
Working with regulators, enforcing authorities and other agencies		

Figure 2: Risk Management Team's approach to regulation and support.

2.0 Equality and Diversity Statement

In line with the Equality Act 2010 Nottingham City Homes will make sure the application of this policy does not discriminate against anyone because of any protected characteristics. The protected characteristics in the Equality Act 2010 are:

- Race
- Age
- Sex
- Disability
- Sexual Orientation
- Religion and Belief
- Gender Re-assignment
- Marriage and Civil Partnerships
- Pregnancy and maternity

An equality impact assessment has been carried out on this policy and is available on request. There have been no adverse impacts highlighted as a result of this policy but managers must make sure equality impact is considered in its day-to-day application.

3.0 Policy Statement

This **Health, Safety and Emergency Control Policy** applies to Nottingham City Homes Ltd (NCH) and its subsidiaries. We operate from our head office at Loxley House, Nottingham, as well as other premises across Nottingham. NCH is a BS OHSAS 18001 certified company.

Our core business is to manage and maintain tenanted and leasehold homes under an agreement with Nottingham City Council, but we also carry out other work both as a contractor and on our own behalf, including the maintenance of existing buildings and the construction and management of new homes.

Many people are affected by the way that we carry out our business, including around 1,000 employees; 26,500 tenancies including leaseholders and their families, friends and visitors; our sub-contractors and people who visit our premises, as well as other members of the public who may come into contact with us from time to time.

It is therefore our policy to make sure that we identify and manage risks to the health, safety or welfare of our employees, visitors, contractors and residents, as well as those that may give rise to an emergency situation or cause disruption to the delivery of our services. To do this, we will:

- Assess and prioritise risks so that resources are appropriately allocated.
- Regularly review our operations to make sure that we comply with relevant legislation, and keep up to date with best practice.
- Regularly audit our higher risk premises and work activities.
- Carry out any necessary tests and inspections of equipment or installations that are designed to protect life, or which are likely to become dangerous if not properly maintained.
- Consult our employees about health and safety, fire safety and emergency control arrangements.
- Train our employees and appoint competent contractors, so that work is carried out safely, to a safe standard.
- Make sure that our employees and contractors have properly planned their work, and know what to do in the event of an emergency.
- Provide clear information to our tenants and residents about health, safety and emergency control matters that affect them.
- Be prepared for emergencies, and implement arrangements that will allow continuous delivery of core services during and immediately after an emergency.

We will regularly review how well we manage health, safety and emergency control issues, with the aim of continually improving our arrangements and performance.

We expect all our employees and contractors to work safely in accordance with the law and the instructions that they have been given, and to be considerate of the needs of people who may be affected by our work. We also expect them to promptly report any incident where somebody has been, or could have been injured, and anything that they see that they consider likely to cause harm to any person.

Likewise, we expect that tenants and residents act responsibly by abiding by their tenancy agreements and any health, safety or emergency control arrangements that apply to the places where they live.

4.0 Organisation

This part of the policy explains how responsibilities for health and safety, fire safety and business continuity are distributed throughout our organisation.

In general terms, health, safety and emergency control are Board responsibilities. It is not, however, practicable for Board members to act in an operational management capacity as they are not executive directors or employees of Nottingham City Homes. Their role is therefore one of scrutiny; the day-to-day management of health and safety is delegated to the Chief Executive, who delegates responsibilities and tasks through the organisation via his management team. This is entirely acceptable and normal practice - it is in this way that health, safety and emergency control becomes the individual responsibility of each and every employee, and certain people (post holders) are given very specific duties to carry out.

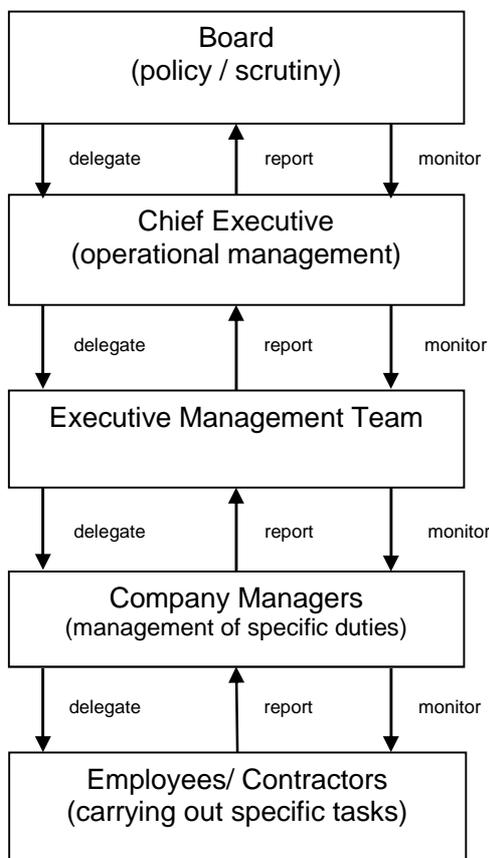


Figure 3: delegation of responsibilities

Although responsibilities and tasks can be delegated, accountability is retained. Therefore, persons delegating responsibilities or tasks to others must take reasonable steps to satisfy themselves that risks are being managed properly. This can be done by receiving reports, observing work in progress, checking records, carrying out inspections, or simply asking from time to time. Similarly, employees to whom specific responsibilities are delegated must report any difficulties or defects upwards.

Notwithstanding the above, every board member and employee has general health and safety, fire safety and emergency control duties that must be observed while at work or acting on the our behalf, and these are described in the following pages. Some post holders also have more specific responsibilities, which are defined in their individual job descriptions or within the more detailed procedures that are linked to this policy.

Finally, some employees may be assigned or volunteer for special positions such as health and safety representatives, risk assessors, fire wardens or first aiders. The additional responsibilities assigned to these employees are described in the relevant procedures.

4.1 Board

Although subsidiary boards are responsible for the allocation of health, safety and emergency control resources within their organisations, NCH Board sets our policy and receives management and performance reports for the entire group. The Group Audit Committee assists the Board to fulfil its statutory obligations by scrutinising corporate risks, including those relating to health and safety, fire safety and emergency control.

The Board will therefore:

1. ensure health, safety and welfare, fire and emergency control is taken into consideration when introducing new strategies and policies;
2. ensure that adequate resources are made available to meet relevant legal obligations;
3. ensure that the Health, Safety and Emergency Control Policy is monitored and reviewed as appropriate in order to secure continuing compliance with current legislation and any changes in the law;
4. consider periodic risk management reports, and take any necessary action arising from them.

4.2 Executive Management Team

(Chief Executive / Directors / Company Secretary)

The Executive management team has delegated authority from the Board to manage this policy on a day to day basis.

Executive Management Team will therefore:

1. appoint one of their team to be the person responsible for health, safety and emergency control (currently the Company Secretary);
2. ensure that the management systems described in this policy are effectively communicated and applied in all areas under their control;
3. make appropriate allocation of resources for the implementation of the Health, Safety and Emergency Control Policy and associated management systems and procedures;
4. take an active and visible role in the management of health and safety, fire safety and emergency control within their divisions;
5. ensure adequate management representation at Health and Safety Committee, Fire Safety Group, Corporate Risk Management Group and Contractor Partner meetings;
6. ensure that managers who report to them are aware of their roles and responsibilities in relation to this policy.

4.3 Senior Management Team

(Assistant Directors, Heads of Service, City Managers etc.)

Senior Managers are typically responsible for managing budgets, applying policies and procedures, purchasing equipment, authorising training, and monitoring performance in their service areas. Although many of these tasks will be delegated in larger teams, it is essential that senior managers take particular care to ensure that they are carried out consistently and diligently.

Senior managers will therefore, within their service areas:

1. take an active and visible role in the management of health and safety, fire safety and emergency control;
2. actively promote and ensure that employees follow our Health, Safety and Emergency Control Policy and associated management systems and procedures, and monitor their effectiveness;
3. advise their director of any additional financial or other resource needed to meet health, safety and emergency control requirements;
4. ensure that managers in their division are aware of their roles and responsibilities for the effective management of health, safety and emergency control risks;
5. liaise with the Risk Management team on relevant health, safety and emergency control risks within their area of responsibility;
6. ensure that all assets and equipment within their areas of responsibility are maintained in good condition and inspected and tested according to legislative and local requirements;
7. assess the effect of the corporate health & safety, fire safety and business continuity hazards on their service areas, and make appropriate arrangements for the control of associated risks;
8. ensure that appropriate risk assessments are completed and reviewed for work carried out within their service areas that is likely to cause harm, that suitable measures to eliminate or reduce risk to as low a level as is reasonably practicable are identified and implemented, and that employees and others who may be affected are informed of the findings of the risk assessment.

4.4 Persons in control of facilities or premises

For the purposes of this policy “facilities” and “premises” are defined as any building or series of buildings within a specific area owned, occupied or used by the Group’s employees as a work place or common areas of domestic premises made available for the use of more than one household. Persons in control of facilities or premises are responsible for the health and safety of all employees, contractors, customers and members of the public who may visit, use or work in them. Note that nothing in this section except for paragraphs 11 & 12 applies to managers using LIFT, JSC or other shared premises.

In general, company workplaces are the responsibility of the Fleet and Facilities Manager, the Temporary Accommodation Manager or the management organisation for shared premises. Responsibility for common areas are distributed as follows, unless otherwise stated:

Maintenance and refurbishment: Asset Management.

Repairs: Repairs & Maintenance.

General cleanliness: Estates & Caretakers*

Tenancy issues: Tenancy & Estate Management.

* Where a caretaker service exists.

Persons in control of facilities or premises will therefore, in relation to the facilities or premises under their control, ensure that:

1. fire prevention and precaution arrangements are maintained, the fire log book is kept up to date, and emergency procedures are clearly available to anyone who may need to make use of them;
2. asbestos within the premises is managed and the asbestos log book is kept up to date and is communicated to those who may carry out work on the premises;
3. the water system within the premises is managed and the water hygiene log book is kept up to date;
4. health and safety site inspections are arranged, undertaken, recorded and actioned at a frequency relevant to the site risk;
5. incidents caused by the malfunction or poor condition of facilities or premises are investigated and remedial action is implemented;
6. the premises and its fixtures and fittings are kept serviceable through regular maintenance and servicing;
7. the premises are provided with adequate security;
8. consultation and communication is made with premises occupants as necessary;
9. where there is shared occupancy, they liaise with other premises managers with regards to the health and safety of the workplace;
10. contractors are inducted in the minimum site health and safety requirements and their safe work practices are adequate;
11. visitors are made aware of relevant health and safety and fire safety requirements and, where they are not familiar with the site, are escorted while on site;
12. a high standard of housekeeping is maintained at all times.

4.5 Contract Managers

For the purposes of this policy, a 'contract manager' is any NCH employee who has, to any extent, control of contractor activity on any NCH managed site.

Contractors will usually work to their own policies, procedures and safe systems of work. This is entirely acceptable, provided that contract managers understand how contractors intend to safeguard the health and safety of NCH employees, other contractors, residents and members of the public, and that they ensure that acceptable standards are maintained on site.

Contract Managers will therefore, in relation to work under their control, ensure that:

1. contractors have been properly appointed according to our current procurement rules, and have appropriate levels of public liability and professional indemnity insurance;
2. contractor supervisors have attended a NCH induction programme before starting work on site;
3. contractors have submitted a method statement detailing how they intend to carry out their work, and a risk assessment detailing how they are going to manage site risks, which are relevant to the work that they will carry out;
4. contractors work to their method statement and risk assessment, unless a variation has previously been agreed with the contract manager;
5. where relevant, contracts are managed in accordance with NCH's current Construction, Design and Management procedure;
6. they inform the Risk Management Team in good time about any planned new project, or significant alterations to the design criteria, timescales or methods of construction employed in any existing project under their control.

4.6 Line Managers

(Area Housing Managers, Caretaker Managers, Repairs Service Managers, Team Leaders, Seniors etc.)

Line Managers are responsible for strict observance of this policy and the associated management systems and procedures in the areas under their supervision. They must also ensure that employees under their supervision are competent and receive the support they need to perform their duties properly and safely.

Line Managers will therefore, within the areas under their supervision:

1. take an active and visible role in the management of health and safety and emergency control;
2. respond positively to identified health and safety, fire safety and business continuity concerns and their resolution;
3. ensure safe working practices are developed and that established health and safety related rules and safe working practices are adhered to;

4. ensure that arrangements for the health and safety of employees are developed, made known and maintained and that arrangements are reviewed whenever there is a change of operation;
5. ensure that the activities they manage are so planned to avoid uncontrolled risks to any person;
6. accompany health and safety inspectors, environmental health officers, fire officers and other enforcement officers visiting the Group, act on their recommendations and inform the Head of Risk Management as soon as possible;
7. ensure that all employees receive area specific health and safety induction training on commencing work, on change of working practices and at any other time that would benefit the individual concerned;
8. ensure that all employees are competent and have received the relevant health and safety and fire safety training to enable them to carry out their work safely;
9. ensure that this policy is communicated to all employees with particular emphasis on roles and responsibilities, and that a copy is kept in a known and accessible location for all employees to refer to;
10. carry out periodic workplace inspections and implement improvements to address identified concerns;
11. ensure that injuries, ill-health, fires, violence to staff and dangerous occurrences are reported to the Risk Management Team in accordance with the current incident reporting procedure;
12. ensure all incidents are investigated and action is taken to prevent a reoccurrence;
13. ensure that all their team members know what to do in the event that a fire, or any other relevant alarm, sounds;
14. challenge unacceptable health and safety behaviour, and take action where employees are seen to avoid or disregard health, safety and emergency control legislation, policies, procedures or guidance.

4.7 Employees

Employees are responsible for looking after their own health and safety, and that of their colleagues or of any other person who might be affected by the way that they go about their work. All employees must therefore approach their work in a diligent, careful and considerate way, and observe any health and safety instructions given to them.

Employees shall:

1. co-operate with the organisation so that we can meet our statutory duties;
2. take reasonable care of themselves and others who may be affected by their acts or omissions;
3. carry out work in a safe manner complying with appropriate health and safety, fire safety and emergency control training, information and instructions, and following relevant policies, procedures and controls;
4. use machinery, substances, transport or other work equipment in a safe manner complying with manufacturers' requirements, appropriate training, information and instructions for use, and following relevant policies and guidance;
5. keep work areas and vehicles in good order and ensure that no dangerous machinery, articles or substances are left unattended in a state or condition where they would present risks of harm to other people;
6. dispose of waste materials in accordance with the instructions and procedures provided to them;
7. immediately report all workplace injuries, ill health, fires, violent incidents and dangerous occurrences to their line manager;
8. make themselves aware of the emergency procedures applicable to the area in which they are working;
9. wear or use any personal protective equipment provided for their safety, routinely inspect it and keep it in a condition fit for that use, and report any defects immediately to their line manager;
10. immediately report to a manager with responsibility for the area any condition or situation which in their opinion is hazardous or a serious and immediate danger to their safety or the safety of other employees or that of any tenant or resident;
11. attend health and safety training courses and occupational health surveillance appointments.

Employees must not:

1. carry out an activity that is likely to put themselves or others in danger or to undertake any hazardous task, which they are not competent to do or have not been trained for;
2. intentionally or recklessly interfere with or misuse anything provided in the interest of health and safety, fire safety or emergency control.

5.0 Specific duties

The following posts have specific duties relating to the performance, maintenance, monitoring and reporting of health and safety, fire safety and emergency control:

5.1 The Company Secretary shall:

1. carry out the role of Company Secretary and lead on issues relating to Group governance;
2. monitor the performance of the Group's Risk Management team;
3. chair the Group's Health and Safety Committee (management review meeting), Fire Safety Group and Corporate Risk Management Group;
4. report on health and safety, fire safety and emergency control matters to the Group's Executive Management Team and Board.

5.2 The Fleet and Facilities Manager shall:

1. take responsibility for those matters previously listed under the 'persons in control of premises' heading within our shared workplaces (i.e. those occupied by employees employed by more than one team);
2. ensure that our vehicle fleet is regularly inspected and maintained in a safe condition;
3. ensure that safety equipment provided for use in our vehicles is periodically inspected and maintained;
4. ensure that persons who are assigned company vehicles are competent to drive and operate the vehicles safely;
5. receive and investigate reports of damage to company vehicles, and put measures in place to rectify any defects identified by the reporting process.

5.3 Risk Management Team

The following posts, employed within the Risk Management Team, have specific health, safety and emergency control responsibilities that are reflected in their individual job descriptions and within the management systems and procedures associated with this policy:

- Head of Risk Management
- Risk Management Advisor (3 posts)
- Company Secretariat Administrator

6.0 Employees with additional responsibilities

Individual employees may be appointed or volunteer to carry out additional roles to their substantive post in order to help the company manage specific areas of its health and safety, fire safety and business continuity procedures. Duties assigned to these employees are outlined in the respective health, safety and emergency control procedures.

7.0 Disciplinary Action

All NCH employees who fail to act according to their responsibilities as described in this policy or associated procedures are subject to disciplinary action, in accordance with the current disciplinary procedure.

Notwithstanding the above, it is our policy to normally re-examine our management arrangements rather than immediately invoking disciplinary procedures unless there is clear evidence that managers or employees have acted negligently or fraudulently, or have wilfully avoided their health, safety and emergency control responsibilities.

Any disciplinary action invoked for breach of Health and Safety Policy will follow the existing NCH disciplinary process.

Explanatory Note

The primary aim of health and safety reporting, inspections and audits is to identify failures in our management systems and procedures, and to put them right before somebody is seriously harmed.

Managers and employees may, however, face disciplinary action if they have knowingly acted or failed to act in accordance with our health and safety policy or procedures. This could include failure to attend training, failing to follow health and safety instructions, or failing to care for or use equipment properly. For managers, this also could include failure to risk assess work, check health and safety arrangements in the areas under their control, or communicate health and safety instructions to employees.

8.0 Health, Safety & Emergency Control Objectives

Our Corporate Plan 2018-21 states that “whilst NCH already puts the health and safety of our employees, contractors and residents of paramount importance, we will redouble our efforts to ensure that NCH is considered an exemplar for health and safety.”

The following objectives outline our plans to improve in this area, by creating safer workplaces and homes, ensuring that managers and employees are healthier and better prepared to manage health and safety and react to emergencies, and by raising our ambitions, improving processes and making efficiencies in the way we manage health and safety, fire safety and emergency control.

Some of these objectives are already in progress, while others may be implemented later in the three year period covered by this policy. Progress against all objectives will be reported to Board in our annual health and safety report.

8.1 Incident management

a. Reduced overall accident rates

This objective is to continue to reduce the overall number of accidents caused by NCH activity on a year-by-year basis. A benchmark figure can be obtained from 2017/18 reports, from which future targets will be set.

Many organisations implement ‘zero accident’ policies, or maintain signs at site entrances showing the number of days since the last lost time injury. These policies are unrealistic, and can be both demotivating and reputationally damaging when accidents do occur. An ability to demonstrate that accidents are continually reducing as an indicator that health and safety conditions are improving is more likely to positively motivate employees.

Methods to achieve this objective include:

- delivering new training sessions to all NCH managers;
- refresher training on accident investigation to all managers;
- monitoring of accident trends at the Health & Safety Committee, Fire Safety Group and Corporate Risk Management Group, with initiatives to reverse trends where possible.

b. Reduction in slips, trips and falls

This objective is to reduce the incident rate of slips, trips and falls sustained by employees when at work or members of the public on housing land. Although this was not one of the top 5 causes of lost time injury in 2017/18, it continues to be one of the most frequent causes of workplace accident and is consistently one of the top causes of personal injury claims.

In order to achieve this objective, we shall:

- ensure that all safety footwear issued to NCH employees has a SRC slip rating (this is currently the highest value for measuring slip resistance).
- review our current adverse weather and gritting policies.
- use smart technology to improve estate and common area inspection processes.

c. Reduction in reversing incidents

Damage sustained to our vehicles and third party property is one of the highest causes of uninsured vehicle incident claims, and is on the increase. This objective is to reduce the incident rate of vehicles causing damage and sustaining damage whilst reversing.

In order to achieve this objective, we intend to:

- revise our driver handbook for NCH fleet drivers and issuing updated guidance to employees who drive their own vehicles at work;
- trial a reverse parking policy for NCH managed car parks;
- procure improved CCTV / reverse parking cameras as part of the fleet replacement in 2020.

d. Zero tolerance of violent behaviour

NCH does not accept that its employees, contractors or partners should have to put up with any form of violence, and will always take action against persons who perpetrate it. We reserve the right to withdraw our services to people who are violent towards our employees or contractors or partners, and will share information about perpetrators of violence with them in order to protect them against future harm or abuse.

In order to achieve this objective we shall:

- place clear messages about our policy in public reception areas, on our internet and in our allocation and responsible tenant documents;
- continue working with the Safer Neighbourhood Housing Manager to ensure that appropriate action is taken whenever we receive a violent incident report;
- ensure in all cases that the injured party, their manager and the Risk Management Team up to date with outcomes to encourage future reporting;
- examine how to withdraw Responsible Tenant Reward payments from residents who have a history of violent or abusive behaviour.

8.2 Management arrangements

a. Transition to ISO 45001

Launched in March 2018, ISO 45001 is the new international health and safety management standard which will replace our current OHSAS 18001 certification within the next 3 years. NCH will renew its 18001 certification in 2018, meaning that we will move to the new standard in 2021.

We will need to review our existing management system, ensuring that it meets the new standard. While much of what we already do will be sufficient, some improvement will be required.

Achievement of the new standard will provide continued endorsement of our health and safety management arrangements to Board, our partners and stakeholders, while enhancing our ability to seek new business contracts.

In order to achieve this objective, we shall carry out a gap analysis of the current health and safety management system to determine what needs to be undertaken to make the transition to ISO 45001, and develop and implement an action plan to ensure compliance.

b. Review our health and safety risk assessment process

We have used the same health and safety risk assessment process for years. Although this has worked well for us, it has not kept up to date with advances in mobile working, and differs from our current Risk Management Framework, which was developed later. Furthermore, risk assessments need to be kept under review, and the current process works but could be improved.

To achieve this objective, we will benchmark with other social housing organisations, as well as investigating improvements that can be made by taking advantage of new technology and software.

c. Adopt PAS 7 standard for our fire risk management system

This objective is to ensure that our fire risk management system is up to date and meets the requirements of PAS 7, which is the relevant national standard. This can either be achieved by self-certification or external verification. In the first instance, we will self-certify our fire risk management system, with a future option of seeking external verification.

We shall take the following steps to achieve this objective:

- undertake a gap analysis identify differences between our existing fire risk management system and the requirements of PAS 7;
- incorporate the changes made since June 2017 into our current documented procedures;
- carry out a further review following the publication of recommendations arising from the ongoing Grenfell Tower independent investigation (expected in Spring / Summer 2018);
- self-certify the management system through our Fire Safety Group.

d. Improved control of internal asset checks

The objective is for Asset Management to examine the benefits of establishing a dedicated team to carry out the in house asset checks currently undertaken by various teams across NCH, including:

- Weekly fire alarm testing;
- Monthly emergency lighting checks;

- Weekly water hygiene flushing;
- Monthly water hygiene temperature checking;
- Annual PAT testing;
- Monthly and annual fire extinguisher checks;

To do this, we will explore if our existing approach to asset safety checks could take advantage of a more efficient and integrated cross company solution, utilising Smart technology, to enhance our approach to safety monitoring.

8.3 Resident safety

a. Review our process for managing water hygiene risks

All our workplaces and properties with shared water supplies are subject to an existing water hygiene assessment and treatment schedule, and we already assess levels of risk in domestic premises using our stock condition data.

This objective is to review our current processes, and to develop a strategy to ensure that on-site inspections of all high risk domestic properties are completed alongside a proportion of low risk properties within reasonable timescales.

To do this, we will:

- review how we gather data for our current assessment process;
- review how we categorise levels of risk for domestic properties, and benchmark this with other housing providers;
- develop a programme of works to ensure all high risk domestic properties have been assessed on site by 2021.

b. Annual high rise health and safety days

The objective is for NCH to hold annual high-rise health and safety days across the 13 high-rise buildings. The opportunity will be used to carry out full tests of the fire alarm, provide reassurance to residents and listen to their concerns, make spot repairs, involve stakeholders such as local councilors and the Fire & Rescue Service, and carry out checks on items such as window restrictors, fire doors and security arrangements.

Dates for initial events have been agreed so that residents of all high rise buildings will have benefitted by the end of 2018, after which the annual programme will become embedded.

c. Sprinklers in all high rise buildings

We shall install sprinklers into the communal areas and flats of the 13 high-rise blocks.

The recommendation to install sprinklers in tower blocks is strongly supported by Nottingham Fire and Rescue Service, who say “Sprinklers are the most effective

way to ensure that fires are suppressed or even extinguished before the fire service can arrive.”

This objective, alongside the installation of tannoys and upgrade of existing intercom systems and fire alarms will cost around £8,000,000, however this budget has already been approved by NCC.

d. Hard wired smoke alarms in all dwellings

The objective is for NCH to ensure hard wired smoke alarms are installed in all NCH managed dwellings. At least one smoke alarm to be installed on every storey of the property which is used as living accommodation. Most NCH dwellings are already equipped with appropriate alarms.

This programme has already commenced, and it is anticipated will have been completed early in the life of this policy.

8.4 Training

a. Accredited health and safety training for directors and senior managers

One of the key changes in ISO 45001 is that executive directors and senior managers must be able to demonstrate how they are actively involved in health and safety management. Our current arrangements go a long way towards this - especially quarterly H&S reporting, senior management involvement in the Corporate Risk Management Group and monthly incident reports for directors and senior managers. The new standard will, however also require directors and senior managers to be able to demonstrate their understanding of their individual and collective responsibilities for health and safety.

There are a number of cost effective accredited courses for directors and senior managers, many of which can be delivered on NCH premises as group training.

b. Internal health and safety training for managers

The Risk Management Team is developing a manager H&S handbook - although this has been delayed, we expect that it will be rolled out shortly. The intention is to follow this up with classroom and e-learning training for all managers with responsibility for employees or premises.

This training will be less theoretical than that provided to senior managers, and will concentrate on providing practical examples of how health and safety is managed at NCH. This will be particularly beneficial for the newly created Repairs Service Manager role, which has particular responsibility for managing health and safety in one of our higher risk service areas.

c. Improved health and safety training for employees

Health and safety training is already provided to employees, according to the requirements of their individual job roles. The roll out of mobile technology has,

however, allowed much greater use of our learning Zone to deliver much of the training that was previously delivered in a classroom or team brief.

We will work closely with our Learning and Development team to make the most of the Learning Zone to deliver good quality interactive health and safety training to employees, while also ensuring that employees also benefit from regular classroom training delivered by our Risk Management team.

To do this, we shall:

- review the basic health and safety training requirements for all job roles;
- revise and improve all our classroom training courses and prepare a schedule of classroom training to be delivered by the Risk management team, and;
- revise and improve all our online training and develop a schedule of refresher training to be delivered via the Learning Zone.

d. Basic medical emergency preparedness

The objective is to provide basic information and instruction to NCH employees who are likely to have regular contact with residents about what to do in a medical emergency via the Learning Zone.

Areas to be covered may include:

- What to do in different types of emergency situation
- How to keep yourself safe if you become involved in an emergency
- Information on support available if you are involved in an emergency
- Basic information from relevant campaigns, such as :
 - ~ British Heart foundation campaign for CPR
 - ~ FAST campaign for stroke awareness
 - ~ St Johns Ambulance campaign for choking

e. Basic fire extinguisher training for employees

Similar to the above, this training would equip employees with the skills to use fire extinguishers in emergency situations to complement their compulsory fire awareness training. As NCH already has appropriate training equipment, hands-on training could easily be delivered at little cost.

8.5 Employee Wellbeing

a. Occupational health checks

This objective is to examine ways of using existing occupational health budgets to pre-emptively reduce sickness absence, rather than waiting for employees to become ill before referring them to occupational health, for example by using 'well person' checks, occupational health nurse appointments or health check kiosks.

To meet this objective, we will:

- Examine different ways of implementing pre-emptive checks, and research data about their effectiveness in other workplaces.
- Search for funding opportunities and free or low-cost programmes which can be used to benefit employees.
- Trial systems or programmes which appear promising in the workplace, with a view to implementing long-term or permanent programmes depending on the outcome of the trials.

b. Defibrillators at NCH workplaces

The objective is to provide a defibrillator and trained personnel at Harvey Road and Bestwood Office due to the increase in numbers of employees at these sites.

Defibrillators are widely available at less than £1,000 each, and are often available free of charge from organisations such as EMAS or St. John's Ambulance if sited in locations accessible to the public.

c. In house operation of lone working technology

We currently use a lone worker mobile app provided by Nottingham City Council. To date, we have been unable to extend this to protection to our Construction, Repairs & Maintenance Colleagues due to the mobile technology requirements needed to use this system.

The roll out of new mobile technology in CR&M, alongside the introduction of a new operating platform at Nottingham on Call will enable us to bring these services in-house, saving us money as well as being able to extend lone worker protection to all employees who work out on the estates.

To achieve this objective, we will:

- test NOC's new lone working platform.
- carry out a trial across various front line services.
- provide training to all service users to ensure that the system is used correctly, prioritising those employees who have been identified as being at most risk.

8.6 Emergency planning

a. Deliver a value for money out-of-hours service

NCC and NCH tenants currently benefit from a range of out of hours services to ensure their ongoing safety and welfare at all times. These services include a 24/7 repairs contact centre, Nottingham on Call, emergency make-safe repairs, and on-duty emergency responders and estates and caretaker managers.

While we recognise the value of all these services, they are currently delivered by a number of teams across our organisation, and are expensive to provide. We will therefore look at ways to rationalise these services by bringing as many of them as possible under one roof, without detriment to the range or quality of the services provided.

b. Medium term emergency housing plan

Nottingham City Homes, working in partnership with Nottingham City Council, has developed a range of plans to ensure that we are able to protect the health, safety and welfare of our residents in the event of an emergency, both in and out of hours. These plans are well established, and have worked well across a range of scenarios.

Part of our emergency plan is the provision of immediate shelter and short-term accommodation for people who are made temporarily homeless following a fire, flood or similar event. One of the difficulties facing local authorities and landlords, however, that was demonstrated after the Grenfell Tower tragedy, is the provision of suitable medium term accommodation following an event in which a large number of people are made homeless for a longer period of time.

Although this type of scenario is very rare, we will work with Nottingham City Council to develop a plan that will enable us to cope with such an event and ensure that the Nottingham residents who are made homeless following a disaster are provided with the best possible accommodation in the circumstances.

9.0 Arrangements

This part of our policy describes how we identify, assess and manage our key health and safety, fire, emergency planning & business continuity risks, and is summarised in figure 4 below:

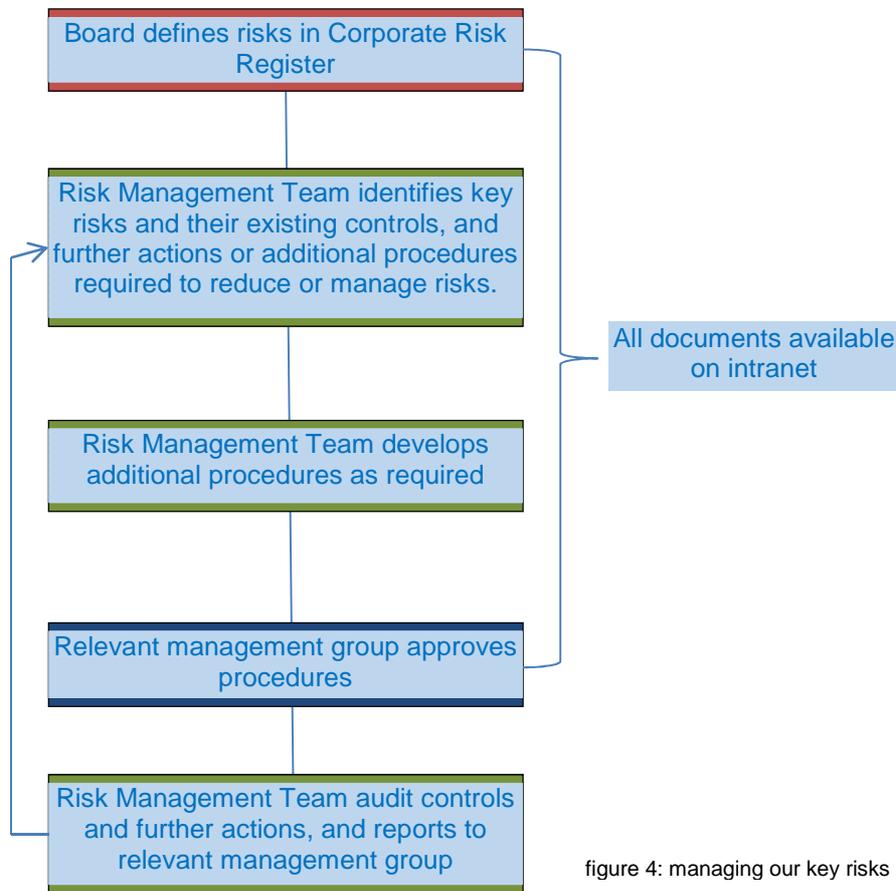


figure 4: managing our key risks

Risks relating to health & safety, fire safety, emergency planning and business continuity are described in our Corporate Risk Register (CRR). Hazards are defined for each risk, and each of these is separately described and assessed in terms of how likely it is to occur, and what the outcome would most likely be. This process identifies our key risks.

The risk assessment describes the measures in place or required to reduce our key risks to an acceptable level in accordance with our [Risk Management Framework](#). Actions identified in the risk assessment are then prioritised and an action plan is developed from them. This process is managed by the Risk Management Team, and monitored and reviewed by appropriate management groups chaired by the Company Secretary.

Additional procedures are developed where necessary to describe our approach to managing individual risks, and are available on our intranet site.

Our arrangements for developing, implementing and communicating our policy and strategy, monitoring and reporting performance, and reviewing our management arrangements are described in detail within the individual management systems listed on the following pages.

10.0 HEALTH AND SAFETY

10.1 Corporate Risks

Risk N^o 3: Health and safety

“A failure to identify and manage health and safety risks or comply with statutory requirements results in fatality, injury, ill-health or legal action.”

10.2 Review Groups

Corporate Risk Management Group
Health & Safety Committee

10.3 HS01 Health & Safety Management System

A health and safety management system is the process used to develop and implement an organisation's health and safety policy, and to manage its health and safety risks.

We have developed and implemented a health and safety management system in accordance with Occupational Health and Safety Assessment Series (OHSAS) 18001: 2007 "occupational health and safety management system – requirements".

The purpose of the management system is to achieve continual improvement by using a systematic method to plan health and safety objectives, put them into place, check that they work and make improvements where they don't: the PLAN - DO - CHECK - ACT model.

This management system also describes how we carry out health and safety inspections, consult with our workforce and audit and review our health and safety processes and performance.

10.4 Health and Safety Procedures

Our Health & Safety Management System, associated procedures and risk assessments will be accessible to all on the intranet under the document directory section for BS OHSAS 18001

Health and Safety procedures in this section are as follows:

- Health and safety management system
- Incident reporting and investigation
- Asbestos
- Working with computers
- CDM management procedure
- First aid
- Hazardous substances
- Health and safety training and information
- Lone working
- Manual handling
- Noise and vibration
- Occupational health surveillance
- Permits to work
- Personal protective equipment
- Portable electrical equipment
- Risk assessments, hazard ID and determining controls
- Vehicle and driver safety
- Work at height
- Work equipment and statutory inspection
- Gritting
- Electrical and gas safety
- Passenger lifts and hoists
- Smoke free policy
- Stress management
- Water hygiene

11.0 FIRE SAFETY

11.1 Corporate Risks

Risk N^o 4: Fire safety

“A failure to identify and manage fire risk results in multiple fatalities, injury, ill-health, loss of or damage to assets or buildings, or legal action.”

11.2 Review Groups

Fire Risk Management Group

11.3 FS01 Fire Risk Management System

We have developed a Fire Risk Management System which is similar to our health and safety management system, but which is more relevant to fire safety. We shall review and self-certify this management system against the PAS 7 standard introduced in June 2013, and which is more suitable for managing fire risks in homes than the 18001 standard.

11.4 Fire Safety Procedures

Fire Risk Management procedures in this section are as follows:

- Fire Risk Assessment
- Premises Inspections
- Emergency Planning and Incident Response
- Control of Work on Site
- Training & Information
- Communication Protocol & Guidance
- Protecting Vulnerable Persons against Fire
- Reporting and Investigation of Fire Incidents
- Equipment Tests & Inspections (Planned Maintenance)
- Responsive Repairs (Communal Areas)
- Installation and Removal of Fire Safety Equipment
- Management of Communal Areas and Mobility Scooters
- Management of Fire Damaged Properties

12.0 EMERGENCY CONTROL

12.1 Corporate Risks

Risk N^o 5: Emergency planning

“A failure to plan for emergencies and have disaster recovery plans in place results in threats to residents' welfare (including loss of accommodation or belongings) or an inability to deliver continuous services.”

12.2 Review Group

Corporate Risk Management Group

12.3 EC01 Emergency Planning & Business Continuity Management System

Our Emergency Planning Management System describes our approach to preparing for emergencies, and is based on ISO22301 “Business Continuity Management”.

In the context of our organisation, an emergency is something that may immediately threaten the health, safety or welfare of our employees or residents, or may cause a significant interruption to our ability to provide our services.

Although the impact of ICT failure on the business is assessed as part of this management system, ICT risks are identified in CRR 10 ‘Failure of Critical ICT systems and data’. The ICT recovery plan is therefore outside the scope of this document.

12.4 Significant Hazards

We recognise that it is not possible to predict each and every emergency or business interruption incident, and so we will identify the hazards that are most likely, due to the nature of our business, to lead to an emergency and / or disruption to our services. The hazards currently identified are:

Likely emergencies situations, which may result in business disruption

- Fire or explosion.
- Loss of utility service (gas, electricity, district heating, water or telephone).
- Asbestos release.
- Gas leak.
- Water leak (flooding / damage caused by burst pipes).
- Flooding caused by rain.
- Structural collapse of all or part of a building.
- Post room incidents and bomb threats.

Likely business interruptions, where no emergency response is likely:

- Severe weather (snow, ice, high wind and extreme heat).
- Industrial or civil actions (e.g. strikes, civil disturbance).
- Epidemic or pandemic disease.
- Loss of knowledge.
- Failure of key supplier / contractor.
- Enforcement action (e.g. prohibition or enforcement notice).
- ICT issues (loss of or disruption to networks, hardware or software systems).

12.5 Emergency Control Procedures

- Emergency Response Plan
- Business Impact Analysis
- Risk Mitigation Plan
- Emergency Contacts Guide