

GEN029

# Health & Safety Policy

December 2025

Respect | Fairness | Caring | Honesty | Accountability



<b>Health and Safety Policy</b>	<b>GEN029</b>
<b>Policy reviewed by:</b>	Caroline Bartlett, Estates Manager
<b>Date reviewed:</b>	October 2025
<b>Board approval:</b>	December 2025
<b>Next Review due:</b>	October 2026

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**This policy should be read in conjunction with our:**

- Risk Management Policy
- [Maintenance Policy](#)
- Needs and Support Planning Policy
- [Equality, Diversity & Inclusion Policy](#)
- [Safeguarding Policy](#)
- Damp and Mould Policy.

<b>Health &amp; Safety Policy</b>	<b>GEN030</b>
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## GENERAL STATEMENT OF POLICY

The purpose of this policy is to provide a safe and healthy working environment for all employees, residents, contractors and visitors to our sites. The association accepts its responsibility for the health and safety of persons who may be affected by its activities, including residents, visitors, and contractors. The association does everything it can to comply with the requirements of the Health and Safety at Work Act 1974 and other relevant regulations. This health and safety policy is kept up to date as the Association changes and is reviewed and changed as necessary annually. A signed copy is displayed on notice boards at each scheme.

This policy is supported by our Risk Management Policy and our Risk Register.

**Signed**  (CEO)

**Date** 21-1-2026

**Signed**  (Chair)

**Date** 12/01/2026

## 1. Responsibilities

The overall responsibility for Health and Safety rests with the Association's Board.

The Chief Executive is responsible for the policy being effectively implemented.

The Estates Manager is responsible for the day-to-day operation of the policy, reporting to the Chief Executive on a regular basis and, if necessary, to the Board.

All employees of the Association shall:

- Take care of their own health and safety, and the safety of others who may be affected by their acts or omissions.
- Work in accordance with any health and safety information, instruction and training given.
- Ensure any defects which could constitute a hazard are reported on our housing management system.
- Use protective clothing and equipment that has been provided in the interests of health and safety in accordance with any instructions and/or training given.
- Accidents and near misses are reported to the CEO, or, for property-related matters, this can also be to the Estates Manager.
- Co-operate fully in the investigation of accidents and dangerous incidents.

## 2. The General Policy

In general, the Association will ensure that:

- It provides and maintains a safe and healthy environment for the employees, residents, and contractors who may work on our premises.
- It incorporates health and safety considerations into all aspects of running the Association and ensures that health and safety is covered in team, committee and board meetings.
- Employees are provided with sufficient information, instruction and training to carry out their jobs safely and without risks to health.
- Employees are provided with safe equipment, suitable personal protective equipment and time to undertake training.
- All compliance checks are undertaken and recorded, and where possible, automated reminders are triggered from our housing management system.
- Employees' health and safety responsibilities are understood through regular training.
- Good health and safety standards are maintained using Health & Safety Executive (HSE) guidance.
- All health and safety incidents are investigated to minimise the risk of similar incidents happening again in the future.

- Disciplinary procedures will be implemented whenever any employee fails to comply with their stated responsibilities.
- Effective means of communication are in place to ensure that everyone understands the policy.
- The timescales for completing health and safety actions are set in accordance with the [Maintenance Policy](#), which reviews the level of risk and allocates a timescale based on the urgency of the issue.

### 3. First Aid & Accident Accounting

All accidents involving employees or members of the public, whether or not resulting in injury, damage or disease, must be reported to the CEO and recorded in the accident log by a member of staff. All reported accidents will be investigated and appropriate action taken to prevent a recurrence.

#### **First Aid Provision**

A first aid box is kept at each scheme, and the contents are checked regularly by the Estates Manager and Scheme Managers to ensure the contents are complete and within expiry.

It is the policy of the Association for all employees to undertake basic first aid training; retraining is done every three years.

#### **Reporting of accidents, incidents and diseases to the Health and Safety Executive (HSE)**

Certain work-related injuries, diseases and dangerous occurrences are legally reportable to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). Advice on the regulations, and the various ways in which accidents can be reported can be found on the HSE website at: <http://www.hse.gov.uk/riddor/index.htm>

In summary, these regulations require the following:

#### **Death or Specified Injury**

The Incident Contact Centre (ICC) must be notified by telephone (0345 300 9923) and an online notification sent within ten days of the accident. Reporting should be done by the CEO or another responsible person within the Association. Definitions of specified injuries are given on the HSE website, but would include injuries such as:

- Fractures other than to fingers, thumbs or toes
- Amputation (including fingers and toes)
- Permanent loss or reduction of sight (temporary loss not included)

- Serious burns (including scalding) which cover more than 10% of the body or cause significant damage to the eyes, respiratory system or other vital organs
- Any crush injury to the head or torso, causing damage to the brain or internal organs
- Any degree of scalping requiring hospital treatment
- Loss of consciousness caused by head injury or asphyxia
- Any other injury arising from working in an enclosed space.

### **Over-seven-day incapacitation of a worker**

An over-seven-day injury is any injury (not classified as a specified injury) that results in the injured person being unable to work or carry out their normal duties for more than seven consecutive days. The seven days exclude the day of the accident but include non-work days such as weekends.

A completed accident report form must be completed online as soon as practicable, and in any event within 15 days of the accident  
(<http://www.hse.gov.uk/riddor/report.htm>)

### **Disease**

It is very unlikely that work done by housing association employees would lead to a notifiable disease. However, if a doctor notifies you that an employee suffers from a work-related disease, then a completed disease report form must be completed online without delay.

### **Dangerous Occurrences**

Some serious non-injury incidents should be notified without delay to the ICC, and an online notification should be sent within ten days of the incident. A few dangerous occurrences which could be relevant are listed below:

- Collapse, overturning or failure of load-bearing parts of lifts and lifting equipment.
- An electrical short circuit or overload causing fire or an explosion.
- Fire causing stoppage of plant involved for over 24 hours, or significant risk of death.

### **Record Keeping**

All copies of RIDDOR reports and investigation paperwork should be retained for at least five years.

### **ICC contact details**

Incident Contact Centre

Tel: 0345 300 9923 (Mon to Fri, 8.30am to 5.00pm – reporting fatal/specified incidents only)

<https://www.hse.gov.uk/riddor/report.htm#online>

#### 4. Fire Safety

The fire procedures of the Association are designed to minimise the risk in the event of fire to our staff, residents, and visitors and have been drawn up in response to the fire risk assessment using a qualified fire safety consultant.

Given the updates to the Regulatory Reform (Fire Safety) Order 2005 in light of the Grenfell Tower disaster, residents are provided with relevant and comprehensible information about the relevant fire safety matters of the building.

Smoke alarms are in place throughout the Association's properties and are tested by the Association's maintenance team every three months. Regular testing is carried out in between these visits by the Estates Manager/Maintenance Manager and Scheme Managers.

Emergency lighting is provided in public areas, stairwells, and corridors and maintained by the same company. All emergency lights (unless of a self-testing type) have a monthly functional check to test whether the lighting is working. A full discharge test is carried out annually, where the test should establish whether the lights last as long as their rated duration (normally three hours). If they fail to last for their rated duration, they should have new batteries or be replaced.

A full copy of the Association's fire procedures and arrangements is available in the office.

#### 5. Purchase and maintenance of equipment

All equipment should be suitable for its purpose and for the conditions in which it may be used.

Training is provided where necessary to operate equipment safely. No person should carry out any work activity where they do not have the knowledge or experience to do it safely, under the direct supervision of a competent person.

All equipment is maintained in accordance with the manufacturer's instructions and repaired as necessary. Any equipment which has statutory examination intervals (e.g. lifting equipment and certain pressure vessels) is independently examined by a competent person at the appropriate intervals.

#### 6. Electrical Equipment

All portable electrical appliances owned by the Association are PAT tested at the appropriate interval by a qualified electrician or suitably trained person, and records of such examination kept.

All flats have an Electrical Installation Condition Report (EICR) carried out by a NICEIC<sup>1</sup> approved contractor, either upon change of occupancy or at the expiry of

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<sup>1</sup> National Inspection Council for Electrical Installation Contracting

the existing report (reports last five years), whichever comes first. These tests are recorded, and any remedial work is carried out.

## 7. Protective Equipment

The Association provides Personal Protective Equipment (PPE) for use at work wherever there are risks that cannot be adequately controlled in other ways. The association assesses what type of equipment is suitable to offer protection against the hazards of the job and ensures compatibility where more than one item of equipment is needed. PPE is appropriately stored such as to prevent damage (e.g. scratches on safety goggles etc.). It is the employee's responsibility to keep any issued equipment clean and in good repair and to ask for replacement when necessary.

## 8. Control of Substances Hazardous to Health (COSHH)

The Association uses very few hazardous substances, only bleach for cleaning and weedkiller for grounds maintenance. Cleaning materials are kept in locked cupboards and the Association's cleaners are responsible for their safekeeping. When using strong cleaning chemicals such as bleach, impervious gloves and eye protection should be worn.

Maintenance materials are kept in locked stores and the association's maintenance store, and are the responsibility of the Maintenance Manager and Estates Manager.

COSHH data sheets are kept in the office for any hazardous materials used. The policy is that no new hazardous products should be used without first obtaining the applicable COSHH safety data sheet, and determining whether it will be safe in the way it is intended to be used.

## 9. Asbestos Policy

TDHA is committed to protecting the health and safety of its employees, tenants, contractors, and visitors by managing asbestos-containing materials (ACMs) in its properties responsibly. The Association recognises its duty under the Control of Asbestos Regulations 2012 to prevent exposure to asbestos fibres and to manage asbestos risks effectively. The roles and responsibilities of TDHA in relation to asbestos management are as follows:

- Maintain an up-to-date Asbestos Register and Asbestos Management Plan.
- Review the Asbestos Policy (part of this H&S Policy) and Management Plan.
- Ensure sufficient resources are allocated for compliance and safety.
- Arrange asbestos surveys and re-inspections as required.
- Ensure that asbestos information is shared with employees, contractors, and relevant third parties.
- Ensure remedial actions are completed when asbestos is identified as damaged or disturbed.

- Ensure that employees follow asbestos procedure, report any suspected damage or disturbance of materials, and do not undertake any work that may disturb asbestos without proper authorisation and training.
- Contractors must review the Asbestos Register before starting any work, must hold the appropriate asbestos awareness training or licences for higher-risk work, and must immediately stop work and report any suspected asbestos disturbance.
- All staff involved in the management of asbestos or likely to encounter asbestos receive asbestos awareness training.
- Tenants will be informed if asbestos is present in their property and advised not to disturb materials.
- Asbestos-containing materials in good condition will be left in place and monitored regularly.
- Damaged or high-risk materials will be repaired, encapsulated, or removed by licensed contractors.

## 10. Legionella Policy

### **What is Legionella?**

Legionella are bacteria found in natural water sources and man-made systems such as storage tanks, pipework, taps, and showers. They thrive between 20°C and 45°C and are killed at 60°C and above. Although often linked to large systems (e.g. hospitals or cooling towers), they can also occur in smaller domestic systems. Legionnaires' disease is a serious but non-contagious pneumonia caused by inhaling water droplets containing Legionella bacteria. It mainly affects older adults, smokers, or people with chest conditions.

### **Legal duties and guidance**

Controlling Legionella is a legal requirement under the **COSHH Regulations**.

Further information and landlord-specific guidance are available on:

- HSE: [www.hse.gov.uk/legionnaires](http://www.hse.gov.uk/legionnaires)
- HSE publication – [The control of Legionella bacteria in water systems](http://www.hse.gov.uk/pubns/legionella.pdf)
- HSG274 Part 2: [Hot and cold water systems](http://www.hse.gov.uk/pubns/hsg274part2.pdf)
- FAQs for Landlords: [HSE Legionella Guidance](http://www.hse.gov.uk/legionella/legoq.pdf)

### **Minimising and Controlling Legionella Risk**

#### **System design and maintenance**

TDHA ensures hot and cold-water systems are designed and maintained to minimise Legionella growth by:

- Improving tank insulation and cleaning/disinfection regimes
- Installing lids and insect screens
- Removing dead legs and faulty valves

Dipslide test results have consistently shown no bacterial growth, indicating a very low overall risk.

## Routine controls

- **Mains-fed systems:** Minimal risk. No testing required as water does not stagnate.
- **Tank-fed systems:** Monthly temperature checks ( $\leq 20^{\circ}\text{C}$  cold,  $> 50^{\circ}\text{C}$  hot, ideally  $55^{\circ}\text{C}$ ). Six-monthly tank inspections and annual checks to drain valves and cylinders.
- **Showers:** Cleaned and disinfected every three months in line with approved guidance.

## Access and records

Residents are contacted in advance to arrange access for testing. All inspection and temperature check records are stored digitally by RMC for five years before disposal.

## 11. Manual Handling Policy

One of the biggest causes of workplace injury is the manual lifting and moving of loads. Manual handling activities are covered by the manual handling regulations. The key points for safe manual handling can be found here - [Manual handling at work - Musculoskeletal disorders - HSE](#), which are shown in the graphic below. Along with employees reading the policy each time it is updated, on-the-job training is provided on manual handling as part of an employee's induction.

The law sets out how employers must deal with risks from manual handling. Our employees all read this guidance annually and where possible:

- Avoid hazardous manual handling, [so far as reasonably practicable](#)
- Assess the risk of injury from any hazardous manual handling operations that cannot be avoided
- Reduce the risk of injury from hazardous manual handling to as low as reasonably practicable



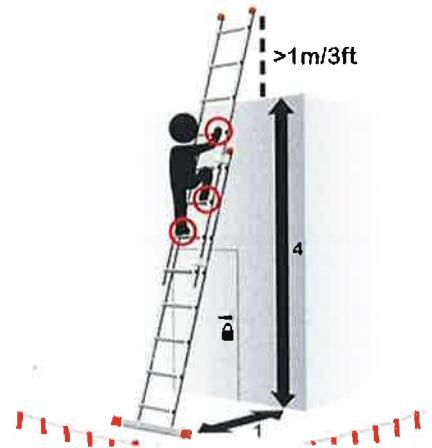
## 12. Ladder Policy

### Pre-use Checks

- All ladders and stepladders must be inspected before use.
- Do not use any equipment that is damaged or in poor condition. Report any faults to the Estates Manager immediately.

### Safe Use of Ladders

- Place ladders on a firm, level surface.
- Ensure the base is stable and cannot slip outwards (see illustration).
- Ladder must be securely tied or footed before use.
- Rest the top against a solid, stable surface.



- Always use both hands when climbing.
- The stiles should extend at least 1 m (3+ rungs) above the rung you are standing on or the access level.
- Keep your body centred and facing the ladder at all times.

### **Safe Use of Stepladders**

- Select the correct type and height for the task.
- Place on a firm, level surface; use signage/cones if positioned in a thoroughfare.
- Ensure the stepladder is fully open and locked into position before use.
- Face the stepladder front-on and avoid overstretching.
- Keep weight centred within the ladder.
- Do not climb higher than the 3rd rung from the top unless a safety hoop of sufficient height is fitted (see photo).
- Never stand on the top rail.

### **Safer Alternatives**

- In accordance with the [\*\*Work at Height Regulations 2005\*\*](#), ladders and stepladders should be used only where work at height cannot be avoided.
- Where reasonably practicable, safer alternatives should be used, including:
  1. **Podiums** (see image)
  2. **Tower scaffolds**
  3. **Mobile Elevated Work Platforms (MEWPs)**
- Alternatives are especially recommended for tasks requiring prolonged time at height or the use of both hands.



## **13. Gas Safety Policy**

Each year, around thirty people die and many more suffer ill health from carbon monoxide (CO) poisoning caused by poorly installed or maintained gas appliances and flues. CO is particularly dangerous because it is invisible, tasteless, and odourless, yet can be fatal within hours. To reduce this risk, residents are not permitted to fit gas cookers or other gas appliances in their properties. The Gas Safety (Installation and Use) Regulations 1998 (as amended) place duties on installers and landlords. Key landlord duties are summarised below:

### **Landlord duties**

Full guidance is on the HSE website: [\*\*HSE Landlord Gas Safety\*\*](#). Key points:

- Maintain installation pipework, appliances, and flues safely and service according to manufacturer instructions. If unavailable, annual servicing is recommended.
- Carry out annual safety checks on all appliances/flues. Checks may be done up to two months early and still count for regulatory purposes.
- Ensure all work is done by a Gas Safe registered engineer.

- Keep records of gas safety certification for at least two years.
- Ensure only competent Gas Safe registered installers carry out work.

**Covered equipment**

Safety checks and maintenance apply to all gas appliances or flues serving the premises, including central heating boilers.

**Access to properties**

Contracts allow access for maintenance and safety checks. Landlords must take "all reasonable steps" to gain access and keep records of any refusals.

**Verifying Gas Safe registration**

Installers should provide a Gas Safe ID card showing their photo, licence number, trading title, expiry date, and areas of competence. Verification is possible via the Gas Safe Register: [www.gassaferegister.co.uk](http://www.gassaferegister.co.uk) or 0800 408 5500.

**If an appliance fails the safety check**

Defects must be fixed by a Gas Safe registered installer before use. Records of remedial work should be kept. Using an unsafe appliance is an offence.

**Gas escape procedures**

If gas is suspected or smelled:

- Open doors and windows.
- Shut off the gas at the meter. If gas continues to escape, call the National Gas Emergency Service: 0800 111 999.
- For suspected CO leakage, follow the above steps and contact a Gas Safe installer for the specific appliance.

All flats with gas appliances have audible CO alarms complying with British Standard EN 50291. Residents must know what the alarm indicates and follow instructions: switch off gas appliances, ventilate, vacate, and contact the office.

#### 14. Damp & Mould Policy

TDHA aim to proactively manage the potential risks arising from damp and mould in our properties, including communal areas, and commit to meeting the needs of our tenants and providing homes that are safe, warm, and dry.

TDHA ensures compliance with relevant legislation and good practice, including the Housing Act 2004, the Housing Health and Safety Rating System (England) Regulations 2005 (HHSRS), under which damp and mould growth is a prescribed hazard, and Awaab's Law (phase one from 27 October 2025) which requires investigation of emergency hazards within 24 hours of notification and investigation of significant damp and mould hazards within ten working days of notification.

Please refer to our Damp and Mould Policy.

## 15. Statutory Lift Testing

In addition to the manufacturer's recommended maintenance intervals, all passenger lifts should be subject to a six-monthly thorough examination by a competent person, and any defects which are identified should be rapidly rectified. In addition, lifts should be subject to thorough examinations following 'exceptional circumstances' such as damage to, or failure of, the lift, or long periods out of use etc. The thorough examination of lifts as required by the Lifting Operation and Lifting Equipment Regulations (LOLER) is often done by, or organised through, the insurance company, as is the case for TDHA.

Records of such examinations are kept for five years.

## 16. Waste Disposal

General household waste disposal and recycling is the responsibility of the Local Authority who will empty bins according to the local schedule. Should this not happen then it is the responsibility of the Estates Manager to ensure that this and any other rubbish or garden waste is disposed of in the proper manner.

## 17. Good Housekeeping

- Employees must report any trip hazards, such as damaged floor coverings or exposed cables, immediately to the Estates Manager and log as urgent.
- Work areas and passageways should be kept clear, tidy, and safe; any spills must be cleaned up immediately.
- High objects should be accessed using a stepladder, repositioned as needed to avoid overreaching.
- Workstations should be kept safe, tidy, and ergonomically arranged.
- Running on-site is prohibited.
- Drawers and storage must be closed after use.

## 18. Scheme Inspections

Quarterly health and safety inspections are undertaken at each scheme by the Estates Manager or a member of the maintenance team, using a detailed checklist. Any issues identified are recorded and addressed promptly. These inspections form a key part of monitoring compliance with the Association's health and safety policy. The Association recognises its legal duties under the Housing Health and Safety Rating System (HHSRS), which assesses 29 hazard categories that may present risks to residents' health and safety. The Association is committed to identifying and addressing Category 1 and Category 2 hazards, including:

- Damp and mould
- Excess cold or heat
- Fire safety
- Falls and trip hazards
- Electrical and gas safety
- Asbestos

- Legionella
- Lighting, noise, and security issues

All quarterly scheme inspections, maintenance works, and property upgrades are aligned with HHSRS principles. Where hazards cannot be entirely removed (for example, steep stairs in older properties), risks are mitigated through suitable control measures such as handrails, anti-slip flooring, and improved lighting.

## 19. Resident Participation

Residents are encouraged to take responsibility for their own health and safety and take reasonable care of themselves and others. Where a resident notices a health and safety problem, they should inform the office or speak directly to a member of staff.

## 20. Equality, Diversity & Inclusion

Health and safety risks can affect people differently depending on age, disability, health, or language. We know this through resident profiles, feedback, and staff records, which show that some groups, such as older residents or those with mobility impairments, may face greater risks. This understanding informs our decisions, ensuring our policies, procedures, and communications are accessible and protective for everyone.

## 21. Sources of Help and Advice

General health and safety information: <http://www.hse.gov.uk/>

Free leaflets and publications contact: HSE Books  
<https://books.hse.gov.uk/bookstore.asp>  
0333 202 5070