



# GROUP HEALTH, SAFETY & WELLBEING POLICY

POLICY IMPLEMENTATION CHECKLIST	
Policy Guardian:	Chief Executive
Author:	Executive Director of
	People & Governance
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Diversity compliant:	Yes
Equality Impact Assessment required:	Yes
Data Protection compliant:	Yes
Health & Safety compliant:	Yes
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Training Completed:	Yes
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Posted on website:	N/A
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### Health, Safety and Wellbeing Policy: Statement of Intent

At the Caledonia Housing Group, we believe in putting people first, with safety of our employees, customers and contractors coming before anything else we do.

Our Health, Safety and Wellbeing Policy sets out health and safety responsibilities and arrangements to ensure the health, safety, and welfare of all tenants, staff, contractors, and visitors,

# Together we will:

- Achieve, and where appropriate, exceed any legal and regulatory requirements that apply,
- Actively develop, promote and embed a strong and positive health, safety and wellbeing culture driven by the Caledonia Management Board and Executive Management Team,
- Undertake regular training to support strong and effective health and safety practices,
- Establish the policy and procedure framework to promote and protect health, safety and wellbeing,
- Provide necessary resources to effectively implement our policies and procedures,
- Develop and implement plans to make sure we achieve agreed objectives and manage identified risks,
- Enable and encourage the input of staff and others to ensure decisions are informed by work conditions, and staff are supported to comment on health and safety matters,
- Support, train and develop staff, and allocate health, safety and wellbeing responsibilities to people who have the necessary skills and knowledge,
- Investigate, report and address incidents and share learning on how we can prevent reoccurrence and improve health and safety practices,
- Identify, assess and eliminate the health, safety and wellbeing risks that arise from our activities and services,
- Create a healthy, productive and inclusive workforce through effective management of staff wellbeing and occupational health,
- Monitor, review and report performance against defined objectives and targets.

We will undertake to continuously review and develop our health and safety management systems and processes with the overarching aim of conducting our activities in a manner which supports and protects the health, safety and wellbeing of our employees, customers, partners and anyone who may be affected by our activities.

We expect everyone at Caledonia Housing Group to share this commitment and to work together to achieve it.

Chair: Chief Executive Officer:

Date: 26 August 2025 Date: 1 August 2025

### 1 Introduction

- 1.1 The purpose of the Caledonia Housing Group Health, Safety and Wellbeing Policy is to clarify the key operating principles that cover all our activities and our commitment to develop a safe, healthy and supportive working environment.
- 1.2 The Group's Health, Safety and Wellbeing Manual has been prepared to support our Health, Safety and Wellbeing Policy as required by the Health and Safety at Work Act 1974. It defines the way we manage the health and safety hazards and risks associated with our business, premises and activities.

# 2 Principles, Aims and Objectives

- 2.1 Our statement of intent sets out our commitment to putting people first, with safety of our employees, customers and contractors coming before anything else we do.
- 2.2 This document is based on the principles contained within the HSE publication "Successful Health and Safety Management" HS(G) 65, and specifically, the Plan, Do, Check, Act management cycle. Further details of the cycle and how it relates to Health, Safety and Wellbeing arrangements at Caledonia can be found in the Caledonia Housing Group Health, Safety and Wellbeing Manual.
- 2.3 Caledonia's Health, Safety and Wellbeing policy framework has been developed in line with key areas of focused set out in the "Putting Safety First: Governance body member assurance" briefing document, established by the Scottish Federation of Housing Associations (SFHA), with support from the Chartered Institute of Housing (CIH) and Association of Local Authority Chief Housing Officers (ALCHO).

#### 3 Legal and Regulatory Requirements

- 3.1 Caledonia health and safety management, policies, systems and processes has been developed in accordance with the requirements of the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.
- 3.2 Legal and regulatory requirements are summarised in the <u>Caledonia Group Health & Safety Legislation Register</u>, available on the staff intranet. The register is used to track and organise information about relevant laws and regulations, reviewed annually by the H&S Officer (People) to ensure optimal levels of compliance with our legal obligations.
- 3.3 The approach to tenant and building safety has been informed and developed to align with the reporting requirements of the Scottish Housing Regulator.
- 3.4 The Scottish Housing Regulator has a significant role engaging with landlords as part of their regulatory framework to ensure landlords are meeting tenant and resident safety requirements. This includes statutory notifiable event guidance, when the Scottish Housing Regulator should be informed of any material, significant or exceptional event. This would include any incident involving the Health and Safety Executive or when there has been a serious incident or threat to tenant safety.
- 3.5 A failure to comply with health and safety legislation, policy and procedures involves serious risks. It could lead to injury, legal action, financial and reputational costs, and regulatory intervention. Accordingly, health and safety features in the Group Risk

Map as a significant risk and is reviewed at each quarterly Audit and Risk Management Committee meeting.

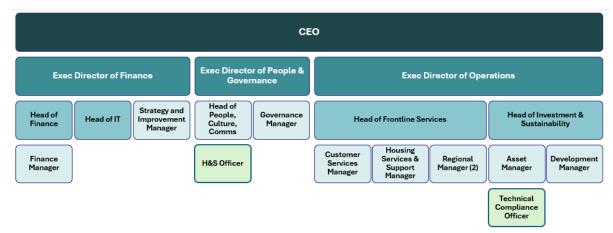
### 4 Health, Safety and Wellbeing: Responsibilities

### 4.1 Summary of Roles and Responsibilities

Key roles and responsibilities are categorised as follows:

- Caledonia Board
- Chief Executive Officer
- Executive Management Team
- Head of Assets & Sustainability
- Head of People, Culture and Communications
- H&S Officer (People)
- Technical Compliance Officer (Assets)
- People Managers
- Our People

# 4.2 <u>Organisational Chart</u>



#### 4.3 Caledonia Board

4.3.1 The Caledonia Board, although not actively involved in the day-to-day management of the business, is collectively responsible for providing the leadership and direction on health, safety and wellbeing across the Caledonia Housing Group to ensure compliance with statutory requirements and appropriate arrangements are in place to keep staff and tenants safe.

A key requirement of the Board is to ensure the policy supports the continued commitment to a strong, positive and proactive safety culture that promotes safety and wellbeing, reducing risk and incidents.

This will be supported through providing strong and visible leadership, ensuring effective management structures are in place, and integrating the principles and priorities set out within the policy into business decision-making. The Board will be supported through members receiving relevant training and being regularly kept informed of performance and risk management issues.

4.3.2 The Caledonia Board are responsible for reviewing and approving the Health, Safety and Wellbeing Policy on an annual basis, while delegating authority to the Chief Executive to ensure the effective implementation of the policy.

#### 4.4 Chief Executive Officer

- 4.4.1 The Chief Executive has a key role for ensuring the systems and controls we have in place are effective and has overall responsibility for compliance and for overseeing the implementation of this policy.
- 4.4.2 The Chief Executive through the line management structures will ensure that there are systems in place to regularly monitor responsibilities and arrangements.

#### 4.4.3 The Chief Executive will ensure that:

- Our Health, Safety and Wellbeing Policy is implemented, monitored, developed, communicated effectively, reviewed and amended as required,
- A health and safety plan of continuous improvement is created and senior management monitor progress against agreed targets,
- Suitable and sufficient funds, people, materials and equipment are provided to meet all health and safety requirements,
- Senior management designated with health and safety responsibilities are provided with support to enable health and safety objectives to be met,
- A strong and positive health and safety culture is promoted and that senior management develop a pro-active safety culture which will permeate into all activities undertaken and reach all of the workforce,
- A system of communication and consultation with employees is established,
- Effective training programmes have been put in to place,
- Structured reporting on the safety performance of the organisation is presented to the Board,
- Notifying the Scottish Housing Regulator through the notifiable event system of any tenant and resident safety matters which have been reported to or are being investigated by the Health and Safety Executive or reports from regulatory or statutory authorities or insurance providers relating to safety concerns.

### 4.5 <u>Executive Management Team</u>

- 4.5.1 The Executive Management team are primarily responsible for health and safety performance within their areas of responsibility. They are responsible for ensuring that all legal requirements are met and that Caledonia's arrangements for health and safety are implemented within their departments.
- 4.5.2 The Executive Management Team must ensure that appropriate arrangements exist to facilitate effective health and safety management.

#### 4.5.3 The duties of EMT include:

- Promoting health and safety as an integral part of normal management practices; including compliance with this policy and ensuring real commitment to all strategies for health and safety across Kingdom;
- Ensuring that appropriate resources are made available for health and safety management;
- Establishing the necessary structures to facilitate effective health and safety management and deliver on-going compliance with statutory health and safety requirements; exceeding those standards where possible;
- Developing a health and safety culture through consultation and participation with our people and developing awareness of their personal responsibilities;

- Ensuring that effective communication systems exist for health and safety and that these have considered the needs of those with a disability that might affect literacy and understanding;
- Ensuring effective implementation of Caledonia's health and safety arrangements and supporting all initiatives for health and safety within their directorates;
- Monitoring the performance of their teams to ensure they meet Caledonia's agreed standards for health and safety;
- Ensuring that provision is made for appropriate supervision and training to ensure employees meet relevant health and safety standards;
- Ensuring that all employees in their departments understand their specific responsibilities and duties with respect to health and safety and comply with them;
- Ensuring that processes, procedures and safe systems of work are developed and implemented in line with this policy;
- Supporting a culture of continuous improvement in health and safety and actively monitoring and reviewing health and safety performance within their departments and across the wider organisation;
- Ensuring that all employees within their area of control are competent and have sufficient resources to remain compliant with health and safety requirements at all times
- 4.5.4 The Executive Director of People & Governance will have specific responsibility for *employee health, safety and wellbeing*, while the Executive Director of Operations will have specific responsibility for *tenant and building safety*.
- 4.6 Employee health, safety and wellbeing key roles & responsibilities
- 4.6.1 The Executive Director of People & Governance is responsible for:
  - Strategically reviewing and implementing the Group's Health, Safety and Wellbeing Policy, and chairing the Health, Safety and Wellbeing Committee,
  - Reporting to the Chief Executive any serious breaches of the duties of the employer under legislation relating to the health and safety of employees, tenants and others,
  - Ensuring that health, safety and wellbeing is considered an integral part of the Group risk map,
  - Presenting the annual health, safety and wellbeing report to the Board or its delegated committee,
  - Keeping the Board informed of key legislative developments and issues and their potential impact on the business,
- 4.6.2 The Head of People, Culture and Communications is responsible for:
  - Appointing and supervising the activities of an appropriately qualified and experienced competent person, in accordance with the requirement for a Competent Person under Regulation 7 of The Management of Health and Safety at Work Regulations 1999,
  - Preparing the annual health, safety and wellbeing report to the Board or its delegated committee,
  - Ensuring Health, Safety and Wellbeing objectives are incorporated into the Group's People Strategy the Group's Learning and Development Curriculum, supported by an Annual Health,

- Providing regular updates to the Health, Safety and Wellbeing Committee regarding key factors affecting employee wellbeing, including employee mental health,
- Working collaboratively with Health, Safety and Wellbeing Committee to ensure culture of continuous learning and improvement with regards to employee health, safety and wellbeing,
- 4.6.3 The Health and Safety Officer (People), supported by Head of People, Culture and Communications is responsible for:
  - Developing the Group Health, Safety and Wellbeing Policy and Group Health, Safety and Wellbeing Manual and monitoring the implementation of relevant health, safety and wellbeing plans,
  - Ensuring fire precautions and procedures in the event of a fire or fire drill are clear, current, and relevant, and accessible to all staff,
  - Providing advice, support and information to managers and staff to enable them to meet their responsibilities, including developing and implementing risk assessments and safe systems of work,
  - Coordinating Health, Safety and Wellbeing Committee Meetings and working collaboratively with Health and Safety Representatives to raise awareness of key health and safety issues and proactively respond to trends in health and safety performance,
  - Deliver annual health, safety and wellbeing audit programme for Retirement and Very Sheltered,
  - Ensure an integrated and personalised approach to employee health and wellbeing, including mental health at work,
  - Monitors and updates KPIs for Employee Safety with reference to the Board reporting framework
  - Oversees design and delivery of Health and Safety learning curriculum, induction for new employees

### 4.7 <u>Building Safety – key roles & responsibilities</u>

- 4.7.1 The Executive Director of Operations is responsible for:
  - Reporting to the Chief Executive any serious breaches of the duties of the employer under legislation relating to tenant and building safety,
  - Keeping the Board informed of key legislative developments and issues and their potential impact on the business in the context of tenant and building safety
  - Assign responsibility to staff for managing assets and facilities health and safety issues, for example, contractor management, asbestos, legionella and fire safety.

# 4.7.2 The Head of Assets & Sustainability is responsible for:

- Overseeing property and facilities management and ensuring strong and effective tenant and building safety systems,
- Ensure contractor management process and controls are in place and routinely followed with regards to all construction, investment and repair contracts,
- Ensuring risk assessments (including Fire Safety Risk Assessments) are carried out and, remain current, and are reviewed and shared with all appropriate staff,
- · Presenting building safety reports to the Board,

- Ensuring Health and Safety objectives are incorporated into the Asset Management Strategy and workforce planning arrangements,
- Ensuring regular updates are provided to the Health, Safety and Wellbeing Committee regarding key factors affecting building and tenant safety
- 4.7.3 The Technical Compliance Officer (Buildings), supported by the Asset Manager is responsible for:
  - Delivery of Health, safety and fire prevention programme in relation to Group property assets in place; ensuring that remedial actions are taken as required and appropriate records maintained,
  - Manages servicing and maintenance regimes for fire protection systems and other components and equipment relating to fire safety,
  - Preparation of appropriate policies and procedures, including risk assessments, and other health and safety initiatives as they relate to Group property assets,
  - Working with the Health & Safety Officer where required to ensure potential risks are identified and control measures implemented and monitored,
  - Attendance at the Group Health, Safety and Wellbeing Committee to provide competent advice to Committee members
  - Support investigations and reports into incidents or claims in relation to Group property assets
- 4.11 Members of the Leadership Team and all other people managers who are in a supervisory position
- 4.9.1 Managers are responsible for ensuring that the Group Health, Safety and Wellbeing Policy and Arrangements are implemented within their area(s) and team(s). They must monitor the workplace to ensure that safe conditions are maintained. Where risks are identified, Managers / Line Managers must ensure that these are eliminated or minimised as far as is reasonably practicable; in line with this policy and the wider requirements of the Group Risk Management Policy.

#### This includes:

- Identifying concerns within their area of control and working collaboratively with the Health & Safety Officer and/or Technical Compliance Officer, or their own manager, to implement policies and procedures to comply with the aims of this policy,
- Ensuring all colleagues adopt safe working practices and ascertain the need for further training or additional risk control,
- Supporting active participation in the health, safety and wellbeing consultative committee,
- Ensuring that staff are informed of health, safety and wellbeing arrangements, and monitoring the effectiveness of arrangements within their area of control,
- Encouraging employees to suggest ways and means of eliminating hazards and of improving the health and safety culture, ethos and procedures through consultation and communication,
- Reporting all near missed, accidents and dangerous occurrences and ensuring appropriate investigation in line with Group Incident Reporting procedure,
- Setting a positive personal example in health, safety and wellbeing

# 4.10 <u>Scheme Managers</u>

4.10.1 The scheme managers have an important role ensuring a safe and healthy working environment for staff and tenants. Scheme managers support the practical implementation of the Fire Risk Management Plan and procedures, as set out in the Fire Register.

### 4.10.2 Key responsibilities include:

- Carry out and record management fire safety checks as part of weekly and monthly audits including weekly fire alarm testing,
- Report any fire safety related concerns to their line manager,
- Report and record all fire safety accidents, near misses and false alarms via the Caledonia Health and Safety portal
- Work collaboratively with line manager, Health and Safety Offer and/or Technical Compliance Officer to ensure thorough incident investigation and practical solutions for retirement living
- Ensure all tenants are provided with relevant fire safety information (fire procedures, leaflets, newsletters, fire safety guidance, updating notice boards etc), while issuing and informing tenants on details of evacuation and stay put procedures,
- Ensure the provision of all relevant signage,
- · Report promptly any repair and follow through on its completion,
- Actively promote fire safety as part of daily duties

#### 4.11 Our People

- 4.11.1 All Caledonia Group employees have a duty to take all reasonable care to protect their own health and safety as well as that of others. Our people will comply with the procedures and arrangements set out in the <a href="Group Health & Safety Manual">Group Health & Safety Manual</a>, and with any relevant information, instruction and training provided. This will include any risk control measures and equipment provided to ensure safe working will be adhered to.
- 4.11.2 Our people will report to their manager and through the incident reporting system any accidents, incidents or near misses, as well as informing their manager what further training or risk control measures would be beneficial.
- 4.11.3 Any unresolved concerns will be highlighted as soon as practical to the Health and Safety Officer.

### 4.12 <u>Contractors</u>

4.12.1 Managers who are responsible for initiating construction, repairs and investment work will ensure compliance with Construction (Design and Management) Regulations. They will take appropriate steps to ensure work is planned, delivered and monitored in accordance with relevant standards and statutory provisions.

# 4.13 <u>The People Team</u>

4.13.1 The People Team support the welfare and mental health of employees within Caledonia and have responsibility for policy relating to these areas.

4.15.2 HR and OD Business Partners will work closely with the Health and Safety Officer and others involved in the delivery and management of health and safety to ensure that the health and safety of employees is supported.

# 5 Health, Safety and Wellbeing Arrangements

- 5.1 Health, Safety and Wellbeing Committee
- 5.1.2 The Health, Safety and Wellbeing Committee are a consultative group which meets on a quarterly basis and is chaired by the Executive Director of People & Governance. Membership includes the Health and Safety officer, representatives from across the directorates and a member from each of the Caledonia and Cordale governing bodies. Attendees are encouraged to feedback any issues raised by colleagues.
- 5.1.3 The Committee has an important role to promote and embed a strong, positive and proactive health, safety and wellbeing culture. The Committee will focus on strengthening health, safety and wellbeing by sharing good practice and prioritising a "lessons learned" approach. Duties include: monitoring health and safety performance and reviewing policy, procedures and plans to ensure performance complies with legislation and the Group's reputation as a leading housing provider and an employer of choice.

# 5.2 Competent person

5.2.1 The Health and Safety Officer will provide advice on health and safety matters and will serve as a source of "competent advice" as required by the Management of Health and Safety at Work Regulations. The Health and Safety Officer has direct access to the Chief Executive and Executive Management Team regarding health and safety issues. The Health and Safety Officer has delegated authority to stop any work which presents an immediate risk.

# 5.3 Health, Safety and Wellbeing Plan

5.3.1 An annual plan is developed to establish the key health, safety and wellbeing priorities. This is monitored on a quarterly basis by the Health, Safety and Wellbeing committee and the Executive Management Team.

### 5.4 Whistleblowing Policy

5.4.1 The <u>Group Whistleblowing Policy</u> provides a framework to report in confidence improper conduct, and specifically highlights the failure to address and/or rectify health and safety hazards.

### 6 Monitoring and review

### 6.1 <u>Policy Review</u>

The Health, Safety and Wellbeing Policy will be revised and reviewed annually or a result of any legislation which may occur before this. The policy may also be subject to review if new guidance is issued or there is a need for revision as result of inspection, audit or an investigation of a significant incident.

### 6.2 <u>Health & Safety Performance</u>

An update on building and employee safety performance is provided to the Governing Bodies on a bi-annual basis. The 'Employee and Building Safety' report covers: measures taken to strengthen the health and safety policy framework; communications, learning and wellbeing initiatives; an analysis of recorded incidents;

and a review of key areas of focus integral to maintaining strong building and employee safety standards.

- 6.3 Equal opportunities
- 6.3.1 The Caledonia Group is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination.
- 6.3.2 The Caledonia Group abides by the UK's Equality Act 2010, including the duty not to discriminate against people from protected characteristics. These characteristics are listed as:
  - age;
  - disability;
  - gender reassignment;
  - marriage and civil partnership;
  - pregnancy and maternity;
  - race (including colour, nationality, ethnic or national origins);
  - religion or belief (this includes lack of belief);
  - sex;
  - sexual orientation.

## 6.4 <u>Compliance Statement</u>

6.4.1 It is important that all members of staff, in carrying out their duties for the Group, do so in accordance with the Group's policy framework. Our policy framework ensures we comply with laws and regulation, while giving guidance to inform operations and decision-making.

Our policies have been designed to be clear and easy to understand, and are available on our website and intranet. If any member of staff is unclear as to their responsibilities under this policy, then they should refer to their line manager and / or the policy author for further guidance.

- 6.4.2 A failure to comply with Group policies can have serious consequences for the Group. Should an employee become concerned about serious non-compliance with the policy, they should speak to their line manager or refer to the guidance set out in the Group Whistleblowing policy.
- 6.5 Related Policies and Procedures
- 6.5.1 The following policies and procedures help to shape our Health, Safety & Wellbeing culture, while ensuring the principles of this policy are consistently applied:
  - Fire Risk Management Plan
  - Health, Safety and Wellbeing Manual