

SAXON WEALD
OCCUPATIONAL HEALTH AND SAFETY POLICY



First Approved: May 2002

Author: Ajadi Ahmed

Last Revision: January 2026

Next Review: January 2027

1.0 Scope

- 1.1 Saxon Weald recognises and accepts its duty of care under the Health and Safety at Work etc. Act 1974 and associated regulations. We are committed to ensuring, so far as is reasonably practicable, the health, safety, psychological health and safety, and wellbeing of all colleagues and the protection of contractors, customers, visitors, and members of the public who may be affected by our work activities. This includes protecting psychological health and safety by identifying, assessing and controlling work-related psychosocial hazards that may cause harm.
- 1.2 This policy applies to all locations and activities under our control, including:
 - Offices, Hubs and mobile operations;
 - Homes, estates and community environments where colleagues or contractors work;
 - All vehicles operated for work purposes; and
 - Any site where we or contractors undertake work on our behalf.
- 1.3 The arrangements within this policy define how we keep people safe and well. They apply to all colleagues and contractors.
- 1.4 This policy covers occupational health and safety (people safety). Property and building safety are managed separately under the Executive Director – Asset & Development (and associated governance forums, e.g., Asset Management & Development Committee), with agreed interface for shared matters (asbestos, electrical, gas safety, fire, lifts and water hygiene safety). See Appendix A.
- 1.5 We will continually develop and operate our Safety Management System (SMS) as far as is reasonably possible in line with recognised standards and guidance: HSG65 (Managing for Health and Safety) and ISO 45001 (Occupational Health and Safety Management System), following Plan–Do–Check–Act (PDCA) principles.

2.0 Purpose and objectives

- 2.1 This policy defines how we plan, organise, control, monitor, and review occupational health and safety arrangements.
- 2.2 Objectives are to:
 - Comply with legal requirements and sector expectations (including Regulator of Social Housing standards).
 - Prevent injury, ill-health and psychosocial harm (including work-related stress and other impacts on mental wellbeing).

- Assess and manage psychosocial hazards (e.g. workload, role clarity, relationships, change management, support) in line with ISO 45003 and HSE Management Standards for work-related stress. (see sections 5 and 7 for governance framework and responsibilities).
- Embed psychological safety so colleagues feel able to speak up and stop work without fear.
- Consult colleagues through employee forum, the 'Pulse'.
- Set and monitor defined OHS objectives and KPIs.
- Define clear lines of responsibility and accountability across all organisation levels.
- Ensure competent leadership, training and supervision across all roles.
- Promote a just, open and learning culture that supports continual improvement.


3.0 Policy statement of intent

3.1 At Saxon Weald, we place our legal, moral and financial responsibilities for occupational health and safety (OHS) at the heart of everything we do. We are committed to fostering a culture where every colleague feels psychologically safe to raise concerns and suggest improvements to safety.

3.2 The Chief Executive (CE) holds overall accountability for OHS performance, supported by the Executive Team (ET). All directors, managers, supervisors and colleagues share personal responsibility for maintaining safe and healthy conditions and acting promptly on any concern.

3.3 We commit to:

- Provide, monitor and maintain safe, healthy and psychologically safe working conditions for colleagues and others affected by our activities.
- Identify, assess and manage risk, monitoring progress against measurable objectives and targets.
- Promote psychological health and safety by identifying and controlling psychosocial hazards and enabling colleagues to stop work where unacceptable risk is reasonably believed to exist.
- Comply with legislation and apply recognised best practice standards; compliance is the minimum.
- Prevent injury, ill-health and psychosocial harm through effective risk control and learning from experience.
- Consult, listen and communicate openly with colleagues or through employee forum, the 'Pulse' on OHS matters.
- Provide adequate resources, training and supervision to build competence and confidence.
- Encourage open reporting of incidents, investigate proportionately and implement corrective and preventive actions with verification of effectiveness.
- Monitor performance and continually improve our OHS systems through audit, assurance and governance review.
- Provide confidential and anonymous reporting routes for OHS concerns, in line with the whistleblowing policy and procedure.
- Review OHS performance regularly to ensure safety risk control effectiveness.

Signed: 
 Chief Executive
 Date: 24 March 2026

4.0 Definitions

Term	Definition
Safety Management System (SMS)	A structured framework used to identify, control and monitor OHS risks and drive continual improvement, aligned to HSG65 and ISO 45001.
Occupational Health and Safety (OHS) management	The prevention of work-related injury, ill-health, or harm (physical and psychosocial) through the anticipation, recognition, evaluation and control of hazards.
POWRA Point-of-Work Risk Assessment	A short, on-site risk review completed immediately before starting a task to confirm that planned controls remain suitable for actual site conditions.
Risk Assessment (RA)	A systematic process for identifying hazards, evaluating risk likelihood and severity, and determining suitable preventive or protective control measures. All risk assessments must be suitable, sufficient and kept under review.
Psychological Health & Safety	Protection of mental health and wellbeing through the identification and management of psychosocial hazards, aligned with ISO 45003 and the HSE Management Standards for work-related stress.
Psychological Safety	A workplace climate where people feel able to speak up, report concerns, raise mistakes, or stop work if conditions are unsafe without fear of unfair treatment.
Just Culture	A fair and consistent approach that distinguishes between human error, at-risk behaviour and reckless behaviour, enabling learning while applying proportionate accountability.
Assurance	Verified confidence that OHS controls are effective, based on monitoring, audit, review and data quality.
Stop-Work Authority	The right and responsibility of any colleague or contractor to stop work they reasonably believe to be unsafe, without fear of unfair treatment.
Key Performance Indicators (KPIs)	Measures used to track OHS performance, including leading indicators (e.g. training completion, near-miss reporting, POWRA compliance) and lagging indicators (e.g. lost-time injury rate, RIDDOR frequency).
Continual Improvement	Ongoing enhancement of OHS performance through learning from data, audits, incident investigation and feedback.
PDCA (Plan-Do-Check-Act)	A continuous improvement cycle used to plan, implement, monitor and improve the effectiveness of the OHS management system.
AIF (Accident Injury Frequency)	Number of RIDDOR-reportable injuries per one million hours worked.
ACR (Action Closure Rate)	Percentage of corrective and preventive actions completed by the agreed deadline.
LTI (Lost Time Injury)	Any injury resulting in one or more full days of absence beyond the day of the incident.
LTIF (Lost Time Injury Frequency)	Number of lost-time injuries per one million hours worked.
TAIF (Total Accident Injury Frequency)	All recorded injuries (minor, lost-time and RIDDOR-reportable) per one million hours worked.
TCR (Training Completion Rate)	Percentage of mandatory health and safety training completed against each role's required training profile.
NMF (Near Miss Frequency)	Near-miss or hazard reports per one million hours worked.

Term	Definition
TVCF (Total Vehicle Collision Frequency)	Vehicle collisions per one million miles driven for work purposes.
Fleet Vehicle Check Rate (FVCR)	Percentage of planned fleet vehicle safety checks completed.
FER (Field Engagement Rate)	Percentage of planned supervisory field safety engagements (e.g. site visits, task observations) completed.
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 – the legal framework for notifiable incidents.
Corrective Action	Action taken to eliminate the root cause of an identified non-conformity or incident.
Preventive Action	Action taken to eliminate potential causes of non-conformity or harm before an incident occurs.
Incident	Any unplanned event that resulted in, or could reasonably have resulted in, injury, ill-health or damage.
Near Miss	An unplanned event that did not cause harm but had the potential to do so.
CDM	Construction (Design and Management) Regulations 2015.

5.0 Policy framework (PDCA)

5.1 This policy framework sets out how occupational health and safety is governed, led and controlled across Saxon Weald. Operating through the Plan-Do-Check-Act (PDCA) model, it ensures OHS risks are identified, managed and continually improved, so far as is reasonably practicable.

5.2 **Plan** – We will plan our OHS arrangements by:

- Identifying and assessing hazards across all operations, including physical and psychosocial hazards.
- Maintaining suitable and sufficient OHS risk assessments.
- Defining measurable OHS objectives and KPIs aligned to organisational priorities.
- Assigning clear responsibilities and accountabilities at every level of the organisation.
- Consulting colleagues through established employee engagement arrangements, including the employee forum ('The Pulse').
- Integrating psychological health and safety considerations into risk assessment and work design.
- Ensuring adequate financial, people and technical resources are available for effective OHS management.
- Identifying strategic and operational OHS risks within the Corporate Risk Register and defining appropriate controls.
- Planning for safety during emergencies, significant change and high-risk activities.

5.3 **Do** – We will implement OHS arrangements by:

- Developing, implementing and maintaining an effective Safety Management System (SMS) integrated into day-to-day operations.
- Conducting and reviewing risk assessments for significant hazards.
- Applying the hierarchy of risk control (eliminate, substitute, engineer, administrate, PPE) wherever reasonably practicable.

- Implementing proportionate Point-of-Work Risk Assessments (POWRA) for relevant operational activities.
- Ensuring colleagues have appropriate competence through information, instruction, training and supervision.
- Managing contractor OHS risks and coordinating with property safety technical leads where interfaces exist (see Appendix A).
- Embedding controls to manage psychosocial risks, including workload, role clarity and access to support.
- Reinforcing stop-work authority so unsafe work can be stopped.
- Making health and safety a standing consideration within team meetings and performance discussions.

5.4 **Check** – We will monitor and review performance by:

- Carrying out routine inspections and compliance checks by line managers, supervisors and the H&S assurance function.
- Reporting incidents and near misses, undertaking proportionate investigations and analysing trends.
- Conducting internal audits and assurance reviews of the OHS management system.
- Analysing leading and lagging performance indicators (e.g. near-miss frequency, training completion, LTIF, action closure rate), supported by defined KPI measures, and data validation checks.
- Reviewing psychosocial indicators (e.g. absence trends, survey feedback, wellbeing data) in coordination with the People Team.
- Reviewing OHS performance through the Executive Team (monthly) and Board, Audit & Risk Committee and Occupational H&S Committee (quarterly).
- Verifying completion and effectiveness of corrective and preventive actions.
- Confirming that training plans and risk assessments remain current and effective.

5.5 **Act** – We will improve performance by:

- Implementing learning from monitoring, audits and incident investigations.
- Analysing root causes, including organisational and cultural factors.
- Reviewing and updating risk assessments, procedures and controls following incidents or significant change.
- Tracking corrective and preventive actions to confirm timely completion and effectiveness.
- Benchmarking OHS performance against sector peers where appropriate.
- Prioritising and resourcing improvement actions through the formal OHS assurance and reporting cycle.

6.0 **Compliance (Assurance, KPIs and Audit)**

6.1 **Purpose**

- 6.1.1 To provide transparent, proportionate assurance to the Board, Audit & Risk Committee (ARC), Executive Team (ET) and Occupational Health & Safety Committee on the effectiveness of occupational health and safety controls and performance.

6.2 Governance, Assurance & Reporting

Forum	Frequency	Purpose
Board	Quarterly	Confirm adequacy of OHS risk controls and overall performance.
Audit & Risk Committee	Quarterly	Scrutinise OHS assurance, and risk control effectiveness.
Executive Team	Monthly	Review OHS performance, including leading and lagging indicators, and progress against improvement actions.
Occupational Health and Safety Committee	Quarterly	Review operational OHS data, incidents, and culture indicators (e.g. reporting behaviour, engagement, action follow-through and learning effectiveness); escalate material issues to ET and ARC.

6.3 Performance measurement

6.3.1 OHS performance is monitored through a balanced set of leading and lagging indicators to provide insight into outcomes, control effectiveness and learning. Headline indicators include:

- AIF (Accident Injury Frequency) RIDDOR
- LTIF (Lost Time Injury Frequency)
- TAIF (Total Accident Injury Frequency)
- TVCF (Total Vehicle Collision Frequency)
- NMF (Near-Miss Frequency Rate)
- TCR (Training Completion Rate)
- ACR (Action Closure Rate)
- FVCR (Fleet Vehicle Check Rate)
- FER (Field Engagement Rate)

7.0 Responsibilities and accountabilities

7.1 Defined responsibilities and accountabilities apply at every level of the organisation.

Level / Role	Key Responsibilities	Accountabilities
Board	<ul style="list-style-type: none"> • Delegate overall responsibility for occupational health and safety (OHS) to the Chief Executive. • Approve the OHS Policy and key performance indicators. • Review quarterly OHS performance and assurance reports. 	<ul style="list-style-type: none"> • Assurance that statutory and corporate OHS requirements are met.
Chief Executive	<ul style="list-style-type: none"> • Sponsor OHS strategy and set organisational direction with the Executive Team. • Ensure adequate financial, technical and people resources are available. • Champion a positive safety and psychological safety culture. 	<ul style="list-style-type: none"> • Overall organisational OHS performance and compliance, accountable to the Board.

Level / Role	Key Responsibilities	Accountabilities
Executive Director – Strategy & Transformation	<ul style="list-style-type: none"> • Ensure delivery of the OHS improvement programme. • Remove organisational barriers to effective OHS control. • Maintain clear interface between people safety (OHS) and property safety. • Sponsor the OHS management system in line with HSG65 and ISO 45001. 	<ul style="list-style-type: none"> • Effectiveness of OHS governance, systems, reporting and assurance.
Executive Team	<ul style="list-style-type: none"> • Monitor OHS performance monthly against KPIs and improvement plans. • Promote positive safety culture across their areas. • Ensure adequate resources within their directorates to implement OHS controls, including psychological health and safety. 	<ul style="list-style-type: none"> • Collective accountability for organisational OHS objectives; individual accountability for directorate performance.
Audit and Risk Committee	<ul style="list-style-type: none"> • Review OHS risks within the corporate risk register. • Scrutinise OHS assurance and performance reports. • Recommend policy approval to the Board. 	<ul style="list-style-type: none"> • Independent assurance to the Board on OHS control effectiveness.
Health & Safety Manager	<ul style="list-style-type: none"> • Maintain the OHS Policy and supporting procedures. • Develop, implement and review the OHS management system. • Operate incident, investigation and action management systems. • Coordinate KPIs and deliver OHS performance reporting to ET, ARC, Board and OHS Committee. • Maintain documented KPI definitions and reporting checks to support accurate OHS performance reporting. • Provide expert advice and assurance oversight. 	<ul style="list-style-type: none"> • Accuracy, completeness and integrity of OHS data, systems and reporting. • Timely escalation of significant risks and non-compliance.
People Team	<ul style="list-style-type: none"> • Support managers on wellbeing, stress risk assessment and early intervention • Coordinate occupational health referrals where required. • Provide employee data (e.g. absence, wellbeing indicators) to support OHS monitoring and assurance. 	<ul style="list-style-type: none"> • Delivery within the People Team remit. • Not accountable for OHS governance, risk ownership or system assurance.

Level / Role	Key Responsibilities	Accountabilities
Assistant Directors / Heads of Service	<ul style="list-style-type: none"> • Embed OHS risk management in operational planning and delivery. • Promote positive safety culture and psychological safety. • Monitor incident trends and implement improvements within their directorate. 	<ul style="list-style-type: none"> • Directorate-level OHS compliance, KPI performance and action closure.
Managers / Supervisors	<ul style="list-style-type: none"> • Ensure OHS requirements are implemented within their teams. • Complete and maintain risk assessments for their areas. • Investigate incidents and ensure timely reporting. • Lead safety engagement and complete corrective actions. 	<ul style="list-style-type: none"> • Day-to-day OHS compliance, supervision, records and action follow-through.
Colleagues	<ul style="list-style-type: none"> • Take reasonable care for their own and others' safety. • Report and record incidents and near misses promptly through reporting tool, EcoOnline. • Use stop-work authority where necessary and escalate to line manager for resolution. • Use the right work tools and personal protective equipment correctly. • Participate and complete identified and assigned OHS training, toolbox talks. • Raise OHS concerns through their line manager, H&S, or People team (concerns should be routed appropriately through internal coordination). 	<ul style="list-style-type: none"> • Compliance with OHS procedures and cooperation with safety arrangements.
Contractors (via Contract Managers)	<ul style="list-style-type: none"> • Comply with applicable OHS and CDM requirements. • Provide risk assessments, method statements and OHS performance data. • Report incidents immediately and cooperate in investigations. 	<ul style="list-style-type: none"> • Safe delivery of contracted works and compliance with contractual obligations.
Occupational Health and Safety Committee	<ul style="list-style-type: none"> • Review OHS performance, incidents and trends. • Enable consultation and escalation of OHS matters. 	<ul style="list-style-type: none"> • Effective consultation and escalation through governance routes.
Representative of employee forum (The Pulse)	<ul style="list-style-type: none"> • Enable consultation and engagement on organisational OHS improvement opportunities 	Consultative role only; no accountability for individual case management or OHS outcomes.

Level / Role	Key Responsibilities	Accountabilities
	<ul style="list-style-type: none"> Represent colleague views on emerging issues for discussion and escalation where appropriate. 	

7.2 Governance structure:

- Strategic oversight: Board and Audit and Risk Committee.
- Strategic delivery: Chief Executive and Executive Team.
- Operational delivery: Assistant Directors / Heads of Service.
- Coordination and monitoring: Occupational Health and Safety Committee.
- Consultation: OHS Committee and team forums.
- Assurance flow: Monthly (ET) and quarterly (ARC, Board, OHS Committee) reporting.

8.0 Equality and diversity

8.1 This policy and its procedures will be applied consistently, fairly and without discrimination. Implementation will align with our Equality, Diversity & Inclusion Policy.

8.2 Reasonable adjustments will be made to ensure accessibility for all colleagues, including colleagues with disabilities or specific needs related to their working environment.

9.0 Related documents (including Interfaces)

9.1 This OHS Policy and procedures are available on the intranet, Launchpad. They set out safe working practices and incorporate relevant regulations and best practice.

9.2 Supporting documents include:

- Incident Reporting & Investigation Procedure
- Display Screen Equipment Procedure
- Asbestos Management Policy
- Construction, Design and Management Policy
- Driving for work guidelines
- Fire Safety Procedure
- Asbestos Management Plan
- Property Safety Policy

9.3 People-Safety and Property-Safety Interface:

- People safety (OHS) covers colleagues, contractors and work activities.
- Property safety covers building compliance system.
- Where a risk involves both (e.g. asbestos exposure, hot works, fire risk, electrical isolations, water hygiene, lifts, gas safety), responsibilities are coordinated between the H&S Manager and the relevant Technical Lead from Assets & Development).

See Appendix A for the interface schedule.

10.0 Legislation and regulation

10.1 The legislation listed below is not exhaustive. To comply with clause 1.1 of the Regulator of Social Housing's Governance and Financial Viability Standard, we will take reasonable measures to ensure compliance with all relevant law by reviewing policies, procedures and amending them as appropriate.

10.2 Key regulations include (not limited to):

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Workplace (Health, Safety and Welfare) Regulations 1992
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Manual Handling Operations Regulations 1992
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Electricity at Work Regulations 1989
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Personal Protective Equipment at Work Regulations 1992 (as amended 2022)
- Health and Safety (Display Screen Equipment) Regulations 1992
- Construction (Design and Management) Regulations 2015 (CDM)
- Regulatory Reform (Fire Safety) Order 2005
- Control of Asbestos Regulations 2012
- Corporate Manslaughter and Corporate Homicide Act 2007
- A full list of applicable OHS and housing-related legislation is maintained within the organisation's legislation and regulation register.

11.0 Review

11.1 This policy will be reviewed annually, or sooner if significant legal, organisational or operational changes occur. The review will be shared for consultation with the Board, Audit and Risk Committee, Executive Team, Occupational Health and Safety Committee and Employee safety forum.

11.2 Review inputs will include:

- Changes in applicable regulation.
- OHS performance monitoring and assurance outputs.
- Sector best-practice guidance.
- Improvement actions for internal and/or external review findings.
- Consultation feedback (colleagues, contractors).
- Lessons learned from incidents.

Version	Amendment	By	Date
1.0	3-year review	Simon Farmer	Nov 2015
2.0	3-year review	Ian Bamforth	Feb 2019
3.0	Annual review	Ian Bamforth	May 2021
4.0	Annual review – Full re-write following the MSAFE review.	Mandy Harley-English	May 2022
4.1	Minor amendments following TIAA's MSAFE follow up audit.	Mandy Harley-English	Nov 2022
5.0	Annual review	Mandy Harley-English	March 2023
6.0	Annual review	Mandy Harley-English	March 2024
7.0	Annual review	Dave Johnson	Jun 2025
8.0	Full rewrite following 2025OHS management gap review: <ul style="list-style-type: none"> • Clarified Board/ET/manager accountability. • Added psychological health & safety and statutory employee representation. • Defined people-safety vs property/building-safety interface. • Quantified performance measurement and key indicators KPIs. 	Ajadi Ahmed	Jan2026

Appendix A: OHS–Property Safety Interface Schedule (Summary)

Activity / Risk Area	Property safety policy	People Safety	Property Safety	H&S Function role (assurance & oversight)	Escalation / Reporting
Asbestos exposure during works	Asbestos Management Plan	Line managers ensure operatives follow agreed safe systems of work and task controls.	Maintain asbestos register, surveys, and removal programmes (via specialist contractors where required). Consultant will be appointed to undertake quality checks for asbestos.	Provide advice on exposure risk; sample assurance of safety controls. Review consultant's assurance framework.	OHS and Property Safety performance reported separately via agreed governance routes.
Task involving hot works	Fire Safety Management Plan	Managers ensure permits are applied, and task controls followed.	Maintain property fire safety strategy, alarm systems, and evacuation arrangements.	H&S function involvement for non-routine or higher-risk activities or where controls deviate from standard arrangements.	Fire incidents or near misses reported through relevant channels; OHS and Property performance reports.
Electrical isolations / work on electrical systems	Electrical Safety Procedures	Managers verify competence and ensure safety controls are followed.	Provide certification, isolation records, and technical verification. Consultant appointed to undertake monthly quality checks for EICR.	Sample assurance of safety controls. Review consultant's assurance framework.	OHS and property safety compliance reported separately.
Water / Legionella control	Water Safety Procedures	M&E manager ensure people safety risks are considered, verified through contract management	Operate water-safety management control, monitoring, and remedial works through specialist contractors. Consultant will be appointed to undertake quality checks	Sample assurance of safety controls. Review consultant's assurance framework.	Any exposure or system breach escalated through both governance lines.

Activity / Risk Area	Property safety policy	People Safety	Property Safety	H&S Function role (assurance & oversight)	Escalation / Reporting
			for water safety.		
Lifts safety	Lifts Safety Procedures	M&E manager ensure access control, exclusion arrangements and site coordination are in place for lift activities; verified through contract management	Manage lift inspection, servicing and statutory compliance. Consultant appointed to undertake quality checks for lifts.	No routine involvement; escalation following incidents or repeated non-compliance. Review consultant's assurance framework.	OHS incidents and property safety performance reported separately.
Gas safety	Gas Safety Procedures	Managers ensure operative competence and task-specific people-safety controls.	Manage landlord gas safety checks, servicing and certification. Consultant appointed to undertake monthly quality checks for LGSR.	Advisory role where people-safety risks escalate beyond standard controls. Support with incident investigation Review consultant's assurance framework.	OHS incidents and property safety performance reported separately.
Contractor and CDM management	Contractor Management Procedure / CDM policy	Contract managers ensure contractors follow agreed safety controls, and review contractor safety performance	Assets / Development team manage statutory CDM duties and project control through appointed consultants.	Where a CDM duty holder (e.g. principal designer, principal contractor, Clerk of Works) is appointed, H&S function provides independent assurance. Where no CDM duty holder is appointed, H&S supports managers proportionate to risk.	Material people-safety or CDM assurance issues reported via ET to Asset Management & Development Committee.

Review: Annually by H&S Manager with Head of Property Safety.

Purpose: Single reference clarifying ownership and escalation between OHS (people safety) and Property Safety (building and asset compliance).