



HEALTH & SAFETY POLICY

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1. Policy Statement

- 1.1** Health, safety and wellbeing are at the heart of everything we do at Eastlight.
- 1.2** Eastlight takes a proactive approach to developing and maintaining a positive culture. We accept our responsibility in keeping our people, customers, homes and communities safe by creating an environment that, so far as is reasonably practicable, minimises health and safety risks.
- 1.3** We commit to:
- Compliance with applicable laws and regulations related to landlord and employer health and safety
 - Ensuring our appointed contractors regularly and routinely evidence their competence with health and safety requirements
 - Hubs, equipment and plant operating in a way that minimises health and safety risks, including appropriate arrangements for the use, handling, storage and transport of articles and substances
 - Safe systems of work that support a positive health and safety culture and minimise risks and issues to our people, customers, contractors, sub-contractors and members of the public
 - Ensuring that assessments of the risk to people arising from our activities are undertaken and that the appropriate control measures are implemented to manage those risks
 - Leaders and managers being competent and equipped to ensure our people work in a safe way, and that they are given appropriate and up-to-date information, training and supervision as is necessary to perform safe work and deliver safe services
 - Regular consultation with our people on health, safety and wellbeing matters, encouraging engagement by all employees
 - Regular review of our operations to make improvements beyond those legally required and at a reasonable cost
 - An Executive Management Team that have oversight on business activity
 - Proactively understanding and complying with changes to regulation
 - Assessing our approach to cultural improvement to benefit our people and customers
 - Robust, regular performance monitoring of landlord and employer compliance
 - Ensuring the safety and management of health risks in connection with the use, handling, storage and transport of all articles, substances and equipment.

1.4 Our people (those employed by Eastlight) must commit to:

- Ensuring full commitment and co-operation to enable Eastlight to comply with its statutory duties
- Taking reasonable care for their own safety and the safety of those affected by their acts or omissions
- Taking responsibility for their work and how it is carried out, including compliance with risk assessments and safe systems of work
- Resolving identified risks and issues or reporting the same where they do not have the accountability to resolve them
- Reporting all accidents, incidents, near misses and dangerous occurrences.

1.5 Those working with us (contractors, volunteers etc.) must commit to:

- Taking reasonable care of their own and other people's health, safety and wellbeing
- Taking responsibility for their work and how it is carried out, including compliance with risk assessments and safe systems of work
- Reporting all accidents, incidents, near misses and dangerous occurrences
- Where applicable, delivering and proactively demonstrating our corporate commitments that were made as part of a procurement process and/or as set out in our contractual arrangements.

1.6 This Policy is part of our proactive culture and management of health and safety. It is therefore reviewed frequently as part of that activity to ensure that it remains fit for purpose.

Chief Executive	Chair of Board
<i>Emma Palmer</i>	<i>Hattie Llewelyn-Davies</i>
Date: 26.11.2025	Date: 26.11.2025

2. Scope

- 2.1** This Policy applies to all our people (everyone that works for Eastlight), customers, Non-Executive Directors, contractors and volunteers.
- 2.2** All business activities and aspects of service delivery are covered by this Policy.
- 2.3** This Policy supports our compliance with all health and safety legal and regulatory requirements.
- 2.4** Related policies (e.g. Safeguarding) will work with this Policy to foster the right culture and provide comprehensive support across Eastlight.
- 2.5** For our people, guidance concerning health and safety can be found on the Eastlight intranet 'Safety Matters' page, with guidance updated as required.
- 2.6** This Policy will be reviewed annually or sooner if there are changes to legislation, the premises, business activity, following an incident that is reportable under the Reporting of Incidents, Diseases & Dangerous Occurrences Regulations (RIDDOR), enforcement action or at the request of the Enforcing Authority.
- 2.7** A review will also be triggered if there are major changes to the organisation structure, or new processes or technology that changes business risk.

3. Statutory & Regulatory Reference

- 3.1** In addition to our regulatory responsibilities regarding Landlord Compliance/ Customer Health & Safety, as defined by the Regulator of Social Housing, Eastlight also has clear legal and statutory obligations via a wide range of primary legislation. These include, but are not limited to:
 - Landlord & Tenant Act 1985
 - Health & Safety at Work Act 1974
 - Management of Health & Safety at Work Regulations 1999
 - Housing Act 2004
 - Housing Health & Safety Rating System 2006
 - Building Regulations 2010
 - The Building (Amendment) (England) Regulations 2024
 - Homes (Fitness for Human Habitation) Act 2018
 - Building Safety Act 2022
 - Safety & Quality Standard – Consumer Standards 2024

- Transparency, Influence & Accountability Standard – Consumer Standards
- The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (Awaab’s Law).

3.2 In addition to these overarching legislative, regulatory and statutory obligations, Eastlight is subject to a wide range of secondary legislation, based upon specific hazards/risks which require identification, management and mitigation in the context of the provision of landlord services. These include, but are not limited to, the so-called ‘Big Seven’ hazard/risk areas of:

- Gas Safety
- Electrical Safety
- Fire Safety
- Asbestos Management
- Water Safety
- Lift Safety
- Damp & Mould.

4. Think Customer

4.1 At Eastlight, we exist to provide the best possible homes and services for our residents.

4.2 Our ‘Think Customer’ approach aims to guide and support colleagues whenever they make decisions that affect our residents, directly or indirectly.

4.3 ‘Think Customer’ ensures our people fully consider how residents will experience and be impacted by the service we provide. Before acting, our people must think about:

- The short and long-term effects of their actions
- The residents’ individual needs and preferences
- Whether their communication is clear, respectful and appropriate
- If they can draw on any past insights or experiences to help them when making tough decisions
- Whether they, themselves, would be happy with the service being provided.

4.4 The ‘Think Customer’ model is designed to complement and work alongside all Eastlight policies and procedures, including this Health & Safety Policy.

5. Eastlight Health & Safety Principles

- 5.1 We have a series of principles that create our health, safety and wellbeing culture at Eastlight, underpinning our approach to decision-making.
- 5.2 **Our Principles**
 - 5.2.1 Our approach to health, safety and wellbeing is the way we do things around here and is always a fundamental consideration.
 - 5.2.2 We integrate safety into our business decision-making and how we deliver services.
 - 5.2.3 We will proactively promote health and wellbeing in our organisation.
 - 5.2.4 We will provide visible leadership, set the standard and be clear on our expectations for health, safety and wellbeing.
 - 5.2.5 Everyone will understand and commit to taking personal accountability for health, safety and wellbeing, and they will be empowered to take responsibility for their own and others' health, safety and wellbeing.
 - 5.2.6 We encourage customers to raise any concerns regarding health and safety directly with Eastlight. For our employees, concerns should be raised directly to their line manager.

6. Equality Impact Assessment

- 6.1 An Equality Impact Assessment (EIA) for this Policy was conducted. As a result, actions have been put in place to mitigate any negative impacts.

APPENDIX 1 – Health & Safety Oversight Structure

ROLE	OVERSIGHT
Board	Has overall responsibility for health and safety at Eastlight.
Executive Management Team	Will lead a positive health and safety culture throughout Eastlight, providing oversight on behalf of the business and assurance for the Board. The scope includes all landlord and employer health, safety and wellbeing activity, and safeguarding.
Health & Safety Operational Forum	Encourages staff engagement and feedback. It oversees operational performance within the business and provides assurance to the Executive Management Team.
Directors & Heads of Service Group	Responsible for operational activity and performance across the business, including that which relates to health, safety and wellbeing activity, compliance and productivity.
H&S Team, Landlord Compliance & Assurance Team	Responsible for day-to-day corporate H&S and landlord compliance activity and performance respectively, providing assurance to the H&S Operational Forum and Executive Management Team.
Independent Health & Safety Advisors	Eastlight appoints the services of an external Health & Safety Advisor to assist as follows: • Advice on activity, compliance and statutory duties, including changes to regulation, statute and horizon scanning • Support with training, investigations, enforcement action and identification of improvements or corrective actions, as appropriate • Carry out audits as requested/agreed with the business • Provide guidance in relation to our policies, procedures and risk assessment framework.

APPENDIX 2 – Roles & Responsibilities

ROLE	ACCOUNTABILITY	RESPONSIBILITIES
Board	Ultimate Duty Holder	• Ensure that the Health & Safety Policy reflects Board priorities and approve the Health & Safety Policy • Ensure health and safety responsibilities are clearly defined within governance and delegation frameworks. • Monitor and review performance and compliance with statutory requirements for landlord, employer and safeguarding duties • Ensure the Board receives adequate assurance • Oversee Eastlight's approach to health and safety, failures, corrective action and improvement plans • Make decisions in regard to health and safety implications, acting as the final decision maker for significant health and safety issues that pose material risk to reputation, compliance or safety • Oversees health and safety as part of the organisation's risk and assurance framework. • Ensures effective systems of internal control and mitigation for health and safety risks. • Promotes a positive health, safety, safeguarding, and wellbeing culture across the organisation.
Chief Executive	Duty Holder	• Visible leadership and custodian of the culture • Responsible for the Health & Safety Policy and ensuring appropriate supporting frameworks to the Board to satisfy its health and safety duties (Executive Management Team and Operational Forum) • Appropriate delegation of the Health & Safety Policy • Responsibility to ensure adequate oversight is provided in the business and at Board.
Executive Directors	Duty Holder & Responsible Persons	• Ensure they and their teams are suitably trained, competent and fully understand their health and safety obligations • Visible cultural leadership and effective management to ensure adequate and effective

		resources to discharge our responsibilities in respect of both landlord and employer health and safety obligations • Directorate responsibility for safe systems of work and health and safety performance.
Directors & Heads of Service	Responsible Persons	• Visible leadership, operational management and decision-making, ensuring the discharge of health and safety obligations • Give adequate time and focus to health and safety in the management of the team and work, and ensure appropriate attention in managing the service • Review health and safety procedures and activity embedded in other policies and procedures to ensure they adequately support the business • Undertake hazard identification and risk assessments, and maintain suitable and sufficient control measures and safe working practices • Ensure legal requirements are fully complied with • Develop and monitor performance reporting to enable monitoring of health and safety data and related compliance matters to enable assurance, and exception reporting to Operational Forum, Executive and Board Members • Ensure contractors and agency workers are made aware of health and safety procedures, are notified of known hazards, and carry out their work without risk to others.
Head of Landlord Compliance & Assurance	Competent Person	• Provide guidance to the business on all aspects of landlord safety and health matters • Ensure adequate skills and expertise to provide appropriate reporting, performance information and maintenance of a centralised database and records • Ensure legal requirements are fully complied with • Develop and monitor performance reporting to enable the monitoring of health and safety data and related compliance matters to enable assurance, and exception reporting to Operational Forum, Executive, and Board Members.

Head of Housing Operations and Head of Neighbourhoods	Competent person	• Provide guidance on all aspects of safeguarding • Ensure adequate skills and expertise to provide appropriate reporting, performance information and maintenance of a centralised database and records • Ensure legal requirements are fully complied with • Develop and monitor performance reporting of safeguarding data and related compliance matters to enable assurance, and exception reporting to Operational Forum, Executive and Board Members • Provide guidance to the business on all aspects of occupational safety and health matters • Raise health and safety awareness and provide appropriate training.
People Director	Competent Person	• Ensure adequate skills and expertise to provide appropriate reporting, performance information maintenance of a centralised database and records • To create and roll out suitable training.
Health & Safety Manager	Responsible & Competent Person	• Carry out inspections of operational sites, Eastlight homes and hubs/offices, in respect of health and safety compliance, as and when requested • Prepare and submit reports of inspections and identify areas of improvement/non-compliance where current legislation or company policy is not being achieved • Provide health and safety awareness training for staff in key areas when requested • Immediately advise of any operation that they believe will result in a risk to serious personal injury or contraventions of statutory provisions • Advise of changes to health and safety legislation or approved Code of Practice to ensure compliance • Carry out investigations in relation to accidents, incidents, near misses, dangerous occurrences and RIDDOR-reportable incidents • Other duties as agreed under terms of contract, implied or stated.

Line Managers	Responsible & Competent Person	• Ensure when engaging contractors that they are competent and follow health and safety protocols when working on site • Where responsible for compliance, to ensure inspections and assessments are carried out, findings are recorded and remedial actions are implemented • Where responsible for managing repairs and maintenance, to ensure that repairs are carried out promptly to maintain safe living conditions • Where responsible for assets, to ensure that stock condition surveys are conducted to help maintain safe homes • Ensure that staff are suitably trained in health and safety as it applies to their role • Ensure that our hubs and workspaces are free from hazards and that health and safety risks are mitigated through the creation, implementation and regular review of risk assessments and safe systems of work • Ensure all accidents, near misses and dangerous occurrences are reported, investigated and lessons learned are implemented to prevent future incidents • To implement and maintain safeguarding procedures for customers • To create and maintain channels for customers to report hazards or safety concerns • To support the physical and mental wellbeing of staff
Employees	Competent Persons	• Familiarise themselves with and observe our health, welfare and safety rules and requirements, in so far as they affect their workplace and activities • Operate equipment for which they have been given authority and training • Follow all safe working procedures as advised • Keep equipment (including protective equipment), used or responsible for, in good condition • Use the correct equipment (including protective equipment)

- Immediately report defects in equipment or poor working practices
- Be alert and suggest ways to remove or reduce hazards
- Report near misses, accidents, dangerous occurrences and potentially serious incidents
- Understand fire, emergency and evacuation procedures
- Attend health, welfare and safety training courses when requested, and use and apply the knowledge gained.

**Contractors &
Third Parties**

**Competent
Persons**

- Sub-contractors are selected using an assessment to include health and safety, and reference areas to ensure the contractor is competent and adequately resourced
- Ensure the safety of all others on site and third parties
- Method statements and risk assessments must be provided before starting work
- Report to the Site Representative on arrival to the site for induction purposes, where applicable
- Provide relevant safety equipment and PPE (Personal Protective Equipment) to carry out the task safely
- Use the correct equipment and tools for the job and keep them in good condition
- Report near misses, accidents and dangerous occurrences
- Comply with any safety directives given
- Maintain training records and a work log to verify the validity of the same
- Full insurance against risk of accidents and damage and provide evidence of the insurance.

APPENDIX 3 – Accountability

Definitions

Ultimate Duty Holder	A person(s) who are ultimately accountable, including vicariously, for the acts and omissions of all others within Eastlight regardless of proximity to such an event or other circumstance.
Duty Holder	By virtue of the position they hold, has implied or stated statutory legal responsibilities and duties empowered upon them and the legal responsibility for any failings. Anyone who has, to any extent, <u>significant</u> control of Eastlight or key systems, may be considered a duty holder.
Responsible Persons	Those who have control over one or more elements of a safe system of work and are, therefore, legally responsible for ensuring that they and persons under their control complete and maintain such systems correctly and effectively to ensure full legal compliance.
Competent Persons	Those persons who may work on, maintain or provide advice for any system are required to be competent as defined under applicable legislation.

APPENDIX 4 – General Arrangements

Health & Safety Policy

- Prepare and publish details of the arrangements for implementing the Health & Safety Policy
- Review the Policy at regular intervals not exceeding three years or following significant changes in organisational or working arrangements, following a RIDDOR reportable incident, following enforcement action, or at the request of the Enforcing Authority
- Establish an effective system to ensure employees are aware of, agree and understand their responsibilities
- Promote, monitor and review information and guidance on health and safety, incorporating new legislation, codes of practice and appropriate industry best practice
- Ensure sufficient and valid Employers Liability Insurance is provided and available.

Risk Assessment

- Ensure a suitable and sufficient assessment of all workplaces, work equipment and work activities under our control to identify significant risks to health and safety. Assessments will follow the standard five steps to risk assessment process
- Implement control measures to reduce risk to an acceptable level and ensure safe working conditions, including the provision of protective devices and PPE
- Consider any special needs of employees, including persons with disabilities, known medical conditions, temporary workers, young persons, pregnancy and new mothers, when carrying out risk assessments
- Regular review of risk assessments, following any significant accidents, incidents, near misses, dangerous occurrences or RIDDOR-reportable incidents.

Safe Systems of Work

- Provide safe working practices and procedures for premises, work equipment, machinery, materials and substances in use, including regular maintenance and servicing, and relevant records are kept
 - Provide information and procedures on specific risks relevant to the organisation such as Lone Working and Violence at Work.
-

Information, Instruction, Training & Supervision

- Establish an effective system to ensure that employees are aware of, understand and agree with their health and safety responsibilities
- Appoint competent persons to implement preventative, protective measures, and ensure that suitable training in health and safety is provided to assist them to effectively control health and safety risks
- Ensure all new employees receive health and safety induction training. Employees have a legal duty to use this training whilst undertaking their work
- Ensure employees receive any additional health and safety training that is relevant to their role and that health and safety training is regularly refreshed
- Provide access to specialist advice or training when required
- Ensure employees understand how to report health and safety concerns, including near misses, accidents, incidents and dangerous occurrences.

Communication & Consultation with Employees

- Consult with and advise employees and other persons, including contractors, temporary staff, volunteers and visitors, of health and safety risks from equipment, substances in the workplace and working practices
- Ensure the health and wellbeing of employees is given due consideration when developing working arrangements
- Ensure there is no hierarchy when reporting health and safety, and that all staff are empowered to report issues
- Ensure employees can access the compliant HSE 'What you need to know' health and safety law poster in our workplaces.

Communication with Customers

- Ensure the health and wellbeing of customers is given due consideration when organising and carrying out work
- Ensure customers understand how to report health and safety concerns, including near misses, accidents, incidents and dangerous occurrences.

Monitoring – Active

- Plan, implement and review an effective Planned & Preventative Maintenance programme for all properties managed by Eastlight
 - Carry out inspections and audits to ensure compliance with health and safety statutory duties and the Eastlight Health & Safety Policy
 - Ensure Key Performance Indicators relating to health and safety are monitored, with remedial action as appropriate.
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Accidents & Emergencies

- Ensure any injuries are treated, recorded, reported to the relevant authorities (if necessary), and that accidents are investigated to enable effective remedial action to be taken
- Implement procedures to follow in the event of emergencies and ensure that they are reviewed on a regular basis
- Appoint and train competent persons to deliver first aid assistance
- Implement preventative fire measures and provide protective Fire Safety arrangements to reduce the risk to persons in the event of a fire.

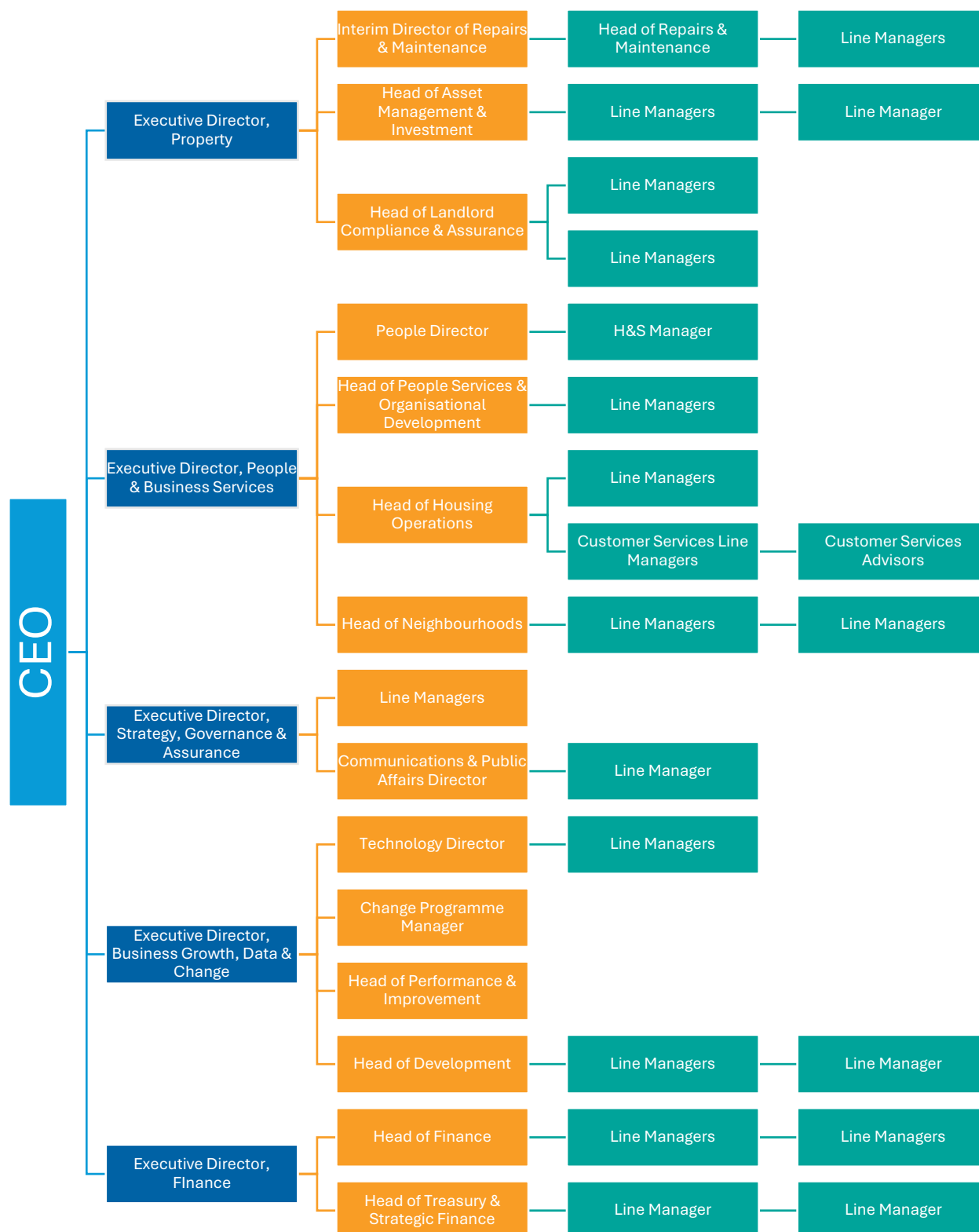
Workplace

- Provide suitable facilities for the welfare of employees
- Design new places of work to minimise any risks to health and safety
- Carry out routine workplace inspections by relevant managers in the areas for which they are responsible
- Carry out additional inspections and/or risk assessments if significant changes to work activities are made or for a person with additional requirements.

Management of Approved Contractors

- Ensure contractors and sub-contractors are aware of their responsibilities for ensuring their employees understand and comply with appropriate procedures
- Instruct contractors to provide their own health and safety policy and procedures when appropriate
- Ensure contractors are aware of specific hazards on site prior to starting work
- Ensure contractors have the skills and knowledge to deliver contracts to required standards without risks to health and safety.

APPENDIX 5 – Reporting Lines



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