



# Health and Safety Policy

**December 2025**

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## Appendices

Appendix 1 - SNG Health and Safety Management System

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## 1. Introduction

1.1 SW9 Community Housing (SW9 CH) recognises and accepts its duty of care under the Health and Safety at Work Act 1974 (HASAWA). SW9 CH is committed to ensuring, as far as reasonably practicable, the health, safety, and wellbeing of all colleagues, as well as the safety of customers, contractors, visitors, members of the public, and other stakeholders affected by its activities.

1.2 This policy applies to all SW9 CH workplaces, including the following:

- The SW9 CH Offices.
- SW9 CH managed supported schemes.
- All residential premises managed by SW9 CH.
- Any other locations where SW9 CH employees, contractors, residents or members of the public may be affected by SW9 CH activities or operations.

Appendix 1 sets out SNG's Health and Safety Management System. SW9 CH aspires to meet the requirements set out in this document.

## 2. Purpose and objectives

2.1 The policy defines the requirements to comply with our legal responsibilities as an employer under the Health and Safety at Work etc. Act 1974, and the Management of Health and Safety at Work Regulations 1999.

2.2 The objectives of the policy are to:

- Prevent, minimise and reduce environmental impacts.
- Set out how SW9 CH delivers appropriate measures to manage the organisation's environmental impacts and conserve resources.
- Define the organisational arrangements for the effective planning, organisation, control, monitoring, and review of preventative and protective measures.
- Outline SW9 CH's commitments to managing the health, safety and welfare (physical and mental wellbeing) of colleagues, contractors and others who may be affected by SW9 CH's activities. The commitments are set out in section 3.
- Establish clear lines of responsibilities and accountabilities (section 8) at all levels of the organisation for all aspects of health and safety.

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### 3. Statement of Intent

SW9 CH places its legal, moral and financial responsibilities towards health and safety at the very centre of its business objectives and is committed to continual improvement. Our goal is to establish a positive safety culture and minimise the impact of the company's operations on the environment, whilst ensuring everyone is safe and well. The Executive Director (ED) has direct accountability for HSE performance. The ED will work with, and delegate to, colleagues and other stakeholders to ensure this policy is delivered.

#### Our Commitments

##### We look out for each other

- We will provide, monitor and maintain safe and healthy working conditions to ensure the safety and wellbeing of our employees, residents and visitors.
- We will identify, risk and manage our HSE risk and impact.
- We will provide safe systems of work and equipment including any personal protective equipment (PPE), transport and handling arrangements as identified through risk assessments, to protect our employees and others whilst undertaking work activities.

##### We do what we say


- We will comply with all legislation required and work to industry best practice standards.
- We will seek to prevent death, injury and ill-health to employees and those affected by our work activities.

##### We learn and improve

- We will consult, listen and communicate with our employees on HSE matters, including changes in legislation or our policies, procedures and programs.
- We will provide adequate resources, information, training and supervision to our employees to build competence and capability.
- We will learn from our mistakes and focus on continual improvement.

##### We do not walk by

- We will empower every employee with the authority to stop work which they believe presents a danger to themselves and others.
- We will establish a culture of open reporting hazards, near misses and incidents.
- We will investigate incidents, determining and implementing corrective actions to prevent recurrence.



**Delroy Rankin**  
Executive Director

## 4. Policy statement

- 4.1 The policy defines how SW9 CH will remove, reduce and minimise the risks from work related activities and how it supports SW9 CH's commitment to the safety of all colleagues, contractors, customers, and anyone affected by SW9 CH's operations.
- 4.2 Occupational health and safety are a principal risk for SW9 CH. In line with SW9 CH's risk aversion for health and safety, we regard compliance with Health and Safety at Work etc. Act 1974, and associated regulations, as the minimum acceptable standard for all activities affecting the health and safety of colleagues, customers contractors, and others who may be affected.
- 4.3 As far as possible, we aim to comply with our parent organisation's certification for ISO 45001 occupational health and safety management systems standards.
- 4.4 We are committed to maintaining the highest standards of health, safety, and psychological safety through a culture of fairness and transparency, ensuring accountability and clear lines of responsibility.
- 4.5 As far as reasonably practicable, we aim to comply with our parent company's aims to reduce our carbon footprint and protect the environment, including the prevention of pollution and the efficient use of organisational resources.

## 5. Compliance

- 5.1 Compliance with this policy will be monitored as follows:
- Targets and key performance indicators (KPIs) will be set by the Finance, Risk and Audit Committee (FRAC).
  - The Business Support Team produces health and safety reports quarterly for the Board via FRAC. These provide a summary of the organisation's health and safety, and other relevant data.
  - Findings and recommendations from annual assurance reviews.
  - Review of accidents, incidents and significant near misses.

## 6. Responsibilities, Accountabilities and Governance Structure

- 6.1 The SW9 CH Board, FRAC, and Executive Director are accountable for ensuring health and safety arrangements are in place and operating effectively.
- 6.2 FRAC forms part of SW9 CH's formal governance structure; ultimately reporting to the SW9 CH Board.
- 6.3 The implementation of this policy is the collective responsibility of all SW9 CH colleagues, achieved through associated procedures and Safety Management System.

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- 6.4 The policy will be communicated to all colleagues through a wide variety of communication channels.
- 6.5 We are committed to continuously enhancing our health and safety standards through benchmarking our performance against leading organisations in the social housing sector. Regular comparisons help us adopt best practices; ensure we meet industry standards and foster a culture of continual improvement.
- 6.6 To achieve our vision of 'Everyone Safe and Well', fostering a strong safety culture is critical for successful H&S management. This requires commitment, proactive actions, and a positive attitude from every level of the organisation. Detailed responsibilities and accountabilities for individuals, roles and groups are outlined in the sections below:

## Board

Responsibilities	Accountabilities
Delegate overall H&S responsibility to the ED.	Monitor delegated responsibilities through FRAC.
Review and assure H&S assessment reports as provided by the Business Support Team.	Review delegated responsibilities at regular intervals for compliance and improvements.

## Executive Director

Responsibilities	Accountabilities
Lead by personal example to establish a pro-active safety culture and promote health and safety awareness throughout the organisation.	Ensure the organisation's H&S Policy aligns with corporate objectives and has been communicated throughout the organisation.
Review H&S performance and progress and inform the Board of any major H&S incidents or potential regulatory notices.	Ensure that colleagues have sufficient time and resources available to implement the H&S Policy and Safety Management System.
Ensure that H&S implications are considered and addressed in decisions made by the Board and SLT.	Ensure that H&S risks are identified, and controls implemented to manage the risk within the organisation's health & safety risk appetite (to be established through the Board's risk appetite).

## Senior Leadership Team

Responsibilities	Accountabilities
Discharge H&E functions delegated by the ED and provide direction as required.	Monitor H&S performance within their business areas.
Allocate sufficient resources for H&S responsibilities within their teams by setting appropriate budgets and staffing levels.	Ensure their business area is properly resourced for H&S management.
Lead by personal example to establish a pro-active safety culture and promote health and safety awareness throughout their business area.	Demonstrate visible leadership in H&S management and strategic decisions.

## Nominated Board Member for Health and Safety

Responsibilities	Accountabilities
Attend monthly health and safety briefings with the Head of Corporate Services. H&S holding review meetings.	To provide information data and briefings as necessary to keep the Board informed.
Make strategic decisions and interventions on H&S risk management.	Ensure risk management interventions are effective and appropriately delivered.
Develop strategies for promoting a health and safety culture (e.g., integrating management of health and safety into general organisational practices).	Provide sufficient resources to fulfil the health and safety responsibilities of each service area.
Arrange the provision of competent health and safety advice and assistance appropriate to the size and complexity of SW9 CH.	Arrange for a suitable and sufficient risk assessment for employees and others affected by SW9 CH work; ensure documentation and action plan.
Arrange representation of SW9 CH and its employees at relevant health and safety panels.	Ensure systems of work are developed which are safe and include descriptions of tasks and safe working procedures.
Accept reports from officers on health and safety matters relating to SW9 CH operations.	Undertake responsibility for reporting accidents and violent incidents.

## Finance Risk and Audit Committee

Responsibilities	Accountabilities
Make strategic decisions and interventions on H&S risk management.	Ensure risk management interventions are effective and appropriately delivered.

## Head of Property Services / Head of Customer Services

Responsibilities	Accountabilities
Develop strategies for promoting a health and safety culture (e.g., integrating management of health and safety into general organisational practices).	Provide sufficient resources to fulfil the health and safety responsibilities of each service area.
Arrange the provision of competent health and safety advice and assistance appropriate to the size and complexity of SW9 CH.	Arrange for a suitable and sufficient risk assessment for employees and others affected by SW9 CH work; ensure documentation and action plan.
Arrange representation of SW9 CH and its employees at relevant health and safety panels.	Ensure systems of work are developed which are safe and include descriptions of tasks and safe working procedures.
Accept reports from officers on health and safety matters relating to SW9 CH operations.	Undertake responsibility for reporting accidents and violent incidents.

## Head of Corporate Services

Responsibilities	Accountabilities
Discharge the functions delegated by the Executive Director.	Motivate managers to discharge their health and safety responsibilities and maintain a record of the arrangements.
Ensure new installations, workstations, equipment, and substances are assessed for health and safety compliance before use.	Support the appropriate Head of Service in arranging safe systems of work including task descriptions, safe working and maintenance procedures.
Raise any potentially serious unresolved/on-going health and safety issues with the Executive Director or delegated representative.	Update the health and safety management system, including safe working procedures, risk assessment and control systems, and monitoring.
Provide information to facilitate participation in, and scrutiny of, SW9 CH's Health and Safety policy.	Produce quarterly reports on health and safety compliance for relevant boards and panels.
Carry out monitoring and auditing to ensure inspections, risk assessments, etc. are consistent across SW9 CH.	Advise on the implementation of new health and safety legislation to enhance working practices.

## Director of Finance and Resource

Responsibilities	Accountabilities
Discharge the functions delegated by the Executive Director.	Motivate managers to discharge their health and safety responsibilities and maintain a record of the arrangements.
Provide sufficient resources to fulfil the health and safety responsibilities of each service area.	Support the appropriate Head of Service/Head of Customer Services in arranging safe systems of work including task descriptions, safe working procedures, maintenance, hazards and emergency information.

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Budget for the provision of competent health and safety advice and assistance appropriate to the size and complexity of SW9 CH.	Raise any potentially serious unresolved/on-going health & safety issues with the Executive Director or their delegated representative.
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## Office Manager

Responsibilities	Accountabilities
Ensure all office related statutory health and safety checks and remedial works are completed.	Maintain compliance with legal safety standards and retain appropriate certification and records.
Maintain safe and functional office systems and environments.	Ensuring offices/buildings are safe, fully maintained, and compliant with H&S regulations.
Support staff safety, training, and incident response.	Promote a positive safety culture and ensure readiness for emergencies.
Manage access, equipment, and environmental compliance.	Safeguard building security and ensure environmental and operational standards are met.

## Health and Safety Officer

Key Responsibilities	Key Accountabilities
Devise and implement the organisation's Health & Safety (H&S) management system.	Ensuring the H&S system is compliant, proactive, and effective in reducing risks across the organisation.
Provide H&S data, reports, and guidance to relevant audiences.	Ensure information is accurate, relevant, and supports informed, compliant decision-making.
Deliver the annual H&S plan and support operational managers.	Demonstrate reduction in H&S risks and embed a strong safety culture across teams.
Identify training needs and deliver H&S training.	Ensuring employees are competent, confident, and compliant with H&S requirements.
Conduct audits, risk assessments, and incident investigations.	Maintain compliance, reduce recurrence, and support continuous improvement.
Manage statutory reporting, documentation, and regulatory engagement.	Ensure legal compliance, accurate records, and readiness for inspections or claims.

## HR Manager

Responsibilities	Accountabilities
Ensuring display screen equipment (DSE) risk assessments are undertaken for all staff on an annual basis.	Ensuring staff have access to comfortable and healthy workspaces.
Referring staff to occupational health providers where required.	Ensuring staff can access occupational health assessments and advice where needed.

## Operational Managers

Responsibilities	Accountabilities
Ensure SW9 CH's health and safety policy is implemented within their service area, including clearly defined arrangements and responsibilities.	Ensure adequate and effective arrangements are in place for consulting employees on health and safety matters, including in one-to-one meetings.
Promote a positive health and safety culture within their service areas.	Monitor health and safety performance by arranging inspections, workstation and risk assessments, review and forwarding reports to Senior Leadership Team (SLT).
Ensure incidents causing injury, violent incidents, and near misses are reported and initial investigations conducted with outcomes recorded.	Receive or produce exceptional reports on urgent health and safety issues.
Allocate sufficient resources to fulfil their service area's health and safety responsibilities.	Be responsible for employees and activities under their control, ensuring compliance with SW9 CH health and safety policy, including suitable risk assessments and risk control measures.
Take action to resolve situations adversely affecting health and safety, rectifying problems within their resources or escalating as needed.	Ensure all employees under their control receive adequate information, instruction, training and supervision, focusing on new/inexperienced staff and trainees.
Ensure staff are familiar with fire, evacuation, and first aid procedures.	Maintain records of employee training and provide details to the human resources team.
Ensure all work equipment is suitable, properly maintained, tested, and assessed.	Develop safe systems of work and support their implementation and management.
Monitor the usage of lone working devices by team members.	Ensure contractors are assessed for health and safety competence during procurement and made aware of their responsibilities once employed.

## Employees

Responsibilities	Accountabilities
Take reasonable care for their own health and safety and that of others affected by their actions or omissions.	Report accidents, incidents, and near misses with injury or damage potential immediately to their line manager.
Report any abusive/threatening behaviour or physical violence immediately and complete the accident/incident report form.	Report hazardous situations or defects in workplaces, plant, or equipment immediately to their line manager.
Attend necessary health & safety training.	Use equipment, safety systems, and safe systems of work safely and only if authorised and trained.
Report loss or damage to personal protective equipment.	Exercise reasonable standards of housekeeping and hygiene.
Co-operate with managers and colleagues regarding SW9 CH's Health and Safety policy and procedures.	Ensure compliance by following all health and safety procedures, reporting hazards promptly,

	and participating in required training and safety activities.
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## 7. Equality and diversity

7.1 We will apply this policy consistently and fairly and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010. For example, reasonable adjustments will be considered for colleagues with a disability with regard to their working environment.

## 8. Related documents

- Fire Safety Policy
- Gas Safety Policy
- Control of Asbestos Policy
- Electrical Safety Policy
- Water Hygiene Policy
- Board Assurance Framework

## 9. Legislation and regulation

9.1 The legislation listed in this policy is not intended to cover all legislation applicable to this policy. To comply with clause 1.1 of the Regulator of Social Housing's Governance and Financial Viability Standard, which requires adherence to all relevant law, SW9 CH will take reasonable measures to ensure compliance with all applicable legislation by reviewing policies and procedures and amending them as appropriate. Any queries relating to the applicable legislation should be directed to the policy owner.

- Health & Safety at Work etc. Act 1974
- Management of Health & Safety Regulations 1999
- Regulatory Reform (Fire Safety) Order 2005.
- The Construction (Design and Management) Regulations 2015
- Fire Safety Act 2021
- Building Safety Act 2022
- The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (Awaab's Law)

## 10. Review

10.1 This policy will be reviewed annually, or sooner if significant changes occur in the relevant legal or operational landscape.

10.2 Input of the review will include changes in applicable regulations, outcome of H&S performance, annual H&S plan, sector best practice guidance, audit results, consultation outcome and performance data.

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<b>Policy author:</b>	<b>Policy and Performance Manager</b>
<b>Policy owner:</b>	<b>Head of Corporate Services</b>
<b>Adopted from Network Homes: y/n</b>	<b>Yes</b>
<b>Review schedule (1, 2 or 3 years):</b>	<b>1 year</b>

**Change Record**

<b>Date</b>	<b>Reviewed by</b>	<b>Version</b>	<b>Summary of changes</b>
November, 2025	Policy and Performance Manager & Head of Corporate Services	V5.0	Annual review, updated to align with newly merged SNG.

## Appendix 1 – SNG’s Safety Management System

### The 12 Elements of the SMS

The requirements for each element are defined by a headline statement and a series of underpinning sub-element standards outlining what good looks like for SNG. Where relevant, the sub-element standards are supported by policies, processes, procedures and programmes that enable us to deliver the requirements. Good practice indicators illustrate what the standards look and feel like in practice.

#### Element 1 – Leadership

**Leaders at every level are visible and inspiring role models. They show a deep commitment to the health, safety, and well-being of their colleagues.**

1.1 Leaders take personal accountability for safety, visibly showing awareness, understanding, and ownership of the incidents, risks, controls, and improvement actions in their business area.
1.2 Leaders actively promote the Everyone Safe & Well vision, demonstrating credibility as safety leaders through consistent words and actions, genuine care for colleagues and creating a psychologically safe environment for learning.
1.3 Leaders show their commitment to safety by making sufficient resources available to consistently operate their business area safely and in compliance with regulatory requirements.
1.4 Leaders implement the Safety Management System requirements by verifying that their teams understand and apply the relevant policies, processes and procedures.

#### Good Practice Indicators:

- Leaders ensure safety is an agenda item at every team meeting
- Leaders discuss safety risks and performance at team meetings, including KPIs, near misses and incidents.
- Leaders discuss applicable risk assessments with individual team members, checking that team members understand hazards and controls
- Leaders follow up personally with any team member who has been involved in an incident
- Leaders visibly role-model the Everyone Safe & Well principles, setting an exemplary standard when it comes to their personal safety behaviours.
- Leaders discuss the Everyone Safe and Well principles at team meetings, encouraging and inspiring the team to apply them consistently.
- Leaders discuss HSE expectations at team meetings and with team members individually, ensuring everyone is clear on the standards expected

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- Leaders respond to news of safety failures with care and curiosity, and discuss the importance of near miss and incident reporting at team meetings.
- Leaders review operational resources at least annually and escalate any resourcing concerns to the relevant Executive Director
- Leaders ensure team members participate in safety activities, including process & procedure development, risk assessment, incident investigation and action closure.
- Leaders discuss role accountabilities and objectives that relate to safety with individual team members, checking clarity of understanding.
- Leaders review Mandatory safety Training reports and follow up with team members who have not completed training.
- Leaders have read and understand fully the SMS requirements, safety policies, processes and procedures relevant to their team's activities.
- Leaders discuss relevant SMS requirements, safety policies, processes and procedures in team meetings.
- Leaders undertake field inspections to verify that controls are understood, in place and operating effectively.

## Element 2 – Risk Assessment and Management

**Health, Safety and Environmental risks and control measures relevant to the organisation's operations are identified, assessed, managed, regularly reviewed, and documented.**

2.1 Develop, review, and update, at a regular frequency, an operational risk register that identifies HSE risks, controls, and actions necessary to manage operational risks consistent with the organisation's averse health and safety risk appetite.

2.2 Identify those risk assessments required by the organisation to be documented, then develop, review and update them periodically.

2.3 Identify and prioritise HSE risk control measures according to the hierarchy of controls, reducing risks as low as reasonably practicable.

2.4 Communicate HSE risks and risk control measures to all relevant stakeholders.

2.5 Monitor that documented risk control measures are understood, in place and operating effectively.

### Good Practice Indicators:

- Departmental Leaders own the operational risk register for their department, reviewing and updating HSE risks, controls and actions at least annually.

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- Managers identify and understand the HSE risks relevant to the operations for which they are accountable. They design controls in collaboration with the HSE Team and implement controls to reduce the risk to a level consistent with an averse risk appetite.
- Managers own, review and update the risk assessments for which they are accountable, collaborating with the HSE team as required.
- Risk Assessments have been identified and developed for relevant Roles, Core HSE Hazards and Operational Tasks.
- Managers identify and understand the HSE risks relevant to the operations for which they are accountable and implement controls to reduce the risk to a level as low as reasonably practicable.
- Colleagues consistently verify that all relevant risk controls are in place prior to work starting.
- Managers undertake checks and inspections to verify that risk controls have been implemented.
- Managers coach team members where controls have not been implemented, and where necessary use the disciplinary process to manage team members who wilfully violate controls.

### Element 3 – People, competence & behaviour

**Health, Safety and Environmental accountabilities are defined for applicable roles, and selection is based on competency. Colleagues are continually developed and work is designed to improve human performance.**

3.1 Define HSE accountabilities and competency requirements for all applicable roles, and select role holders based on specified HSE competencies and job requirements.
3.2 Periodically assess the HSE competencies of applicable role-holders, ensuring colleagues complete relevant HSE training and development programmes.
3.3 Define and annually review HSE training requirements for all applicable roles. Periodically evaluate HSE training programmes for effectiveness, implementing improvements as required.
3.4 Consider human performance in the design of work processes and control measures to reduce the likelihood and impact of human error. Establish mechanisms to motivate the application and monitoring of safe working practices.

### Good Practice Indicators:

- All job descriptions identify relevant HSE accountabilities and competencies.
- Managers include HSE competency requirements in the recruitment process, especially interviews, and only recruit candidates who meet HSE competency requirements.
- Managers deliver an HSE onboarding to new joiners
- Managers regularly discuss HSE competencies and behaviours with team members, identifying opportunities for development and improvement

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- Managers and colleagues attend mandatory HSE training.
- Managers monitor the mandatory HSE training completed by colleagues, and immediately follow up on any cases of non-attendance
- Colleagues proactively self-assess their own HSE competencies and behaviours in line with the HSE competency frameworks, identifying development opportunities with their line manager.
- HSE Team ensures that an up to date HSE Training Matrix is easily accessible to all managers and colleagues
- HSE Training course owners seek feedback from attendees to evaluate course effectiveness.
- Managers review the course quality and effectiveness with team members and provide feedback to training course owners.
- Managers understand human factors and the principles of human and organisational performance and use these when designing work and programmes to motivate safe behaviours.
- Managers seek to learn from normal work, through safety conversations and other field observation activities, and improve task design based on such observations.

#### Element 4: Communication, Information & Document Management

**Health, Safety and Environmental information, including requirements and guidance, is communicated effectively with stakeholders. Documented HSE requirements are systematically managed.**

4.1 Consult with colleagues on HSE matters, including incidents, risks, requirements and guidance.
4.2 Develop, review and maintain relevant HSE requirements and guidance through documented policies, processes, procedures and programmes.
4.3 Operate an HSE document management system for the control and approval of HSE requirements documents.
4.4 Communicate HSE information, including requirements and guidance, using channels that are relevant to internal and external stakeholders. Monitor that communication of HSE information is effective.
4.5 Identify and document all applicable regulatory HSE requirements in a legal register.

#### Good Practice Indicators:

- HSE team share proposals with employee groups when introducing new requirements or guidance.
- Relevant Managers and colleagues who carry out the tasks are consulted when developing or reviewing risk assessments.

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- Relevant Managers and colleagues are involved in the development and review of HSE new requirements or guidance
- HSE policy, requirements documents and guidance are all kept current and within review date.
- HSE documentation is accessible to all colleagues, and is in legible and easy to read formats.
- Managers review and update HSE documentation before the review date or when there is a change to working practices.
- Relevant HSE documents are version controlled and catalogued for easy access and visibility.
- Managers share findings of incident investigations with team members for wider learnings.
- Delivery & Technical Managers conduct weekly toolbox talks on HSE matters.
- Communications team reviews communication channels regularly for effectiveness.
- HSE Team maintain Legal register with appropriate applicability documented for each applicable legislation.

## Element 5 – Control of Operational Activities

**Operational work is controlled effectively to enable tasks to be completed safely.**

5.1 Identify hazards and assess risks, then develop, communicate, implement and maintain effective controls for operational tasks.
5.2 Supervise and monitor implementation of controls to ensure colleagues are aware of, understand and follow applicable operational requirements.
5.3 Monitor and identify applicable HSE regulatory requirements and implement operational procedure controls to maintain compliance.
5.4 Implement the permit to work process for designated higher-hazard non routine operational tasks to ensure that hazardous work is assessed, planned, authorized and carried out in a way that ensures the health and safety of all stakeholders affected by the work.
5.5 Define, implement and monitor controls for specified safety critical tasks including working at height; breaking ground; driving and asbestos.
5.6 Identify safety critical equipment; define and implement an inspection and maintenance programme and manage safety critical equipment in an equipment register.
5.7 Provide suitable Personal Protective Equipment (PPE) to colleagues as specified in risk assessments; deliver training and monitor PPE is being used appropriately and maintained.

**Good Practice Indicators:**

- Managers are aware of and understand the HSE operational risk register for the division in which they operate.
- Managers review and update the risk assessments for which they are accountable, reaching out to the HSE team for support where required.
- Managers ensure risk assessments and risk controls have been communicated effectively to colleagues.
- Managers regularly discuss operational risks and requirements with team members, explaining controls defined in risk assessments and procedures.
- Managers spend time in the field observing colleague's and coaching them on safety requirements.
- Managers undertake field inspections to verify that operational requirements are understood, in place and operating effectively.
- HSE team and operational managers ensure that HSE regulatory requirements applicable to SNG's operations are recorded in an HSE legal register, and verified for compliance.
- Managers have a good understanding of the HSE regulations applicable to the activities their team undertakes
- Managers have a good understanding of the SNG procedures that define how regulatory requirements are delivered.
- Managers are aware of and understand the SNG Permit to Work process, including the activities in scope and the role in the process
- Managers plan and authorise work in accordance with the Permit to Work process
- Managers have a good understanding of the Lifesaving rules, have communicated them to their teams and verified that their teams understand the rules.
- Managers have a good understanding of the relevant requirements in HSE policies, processes and procedures and have communicated them to their teams
- Managers are aware of when their teams undertake safety critical tasks and conduct field inspections to verify controls are in place and operating effectively
- Managers actively input and keep up to date the PTE register, ensuring it accurately records safety critical equipment, inspection and maintenance.
- Managers ensure relevant Personal Protective Equipment (PPE) is available to colleagues.

**Element 6: Building Safety**

**Our buildings always meet the safety requirements of current and future expected regulations. We have communicated and engaged with all our customers, responding to their concerns and demonstrating that they are living in safe homes.**

6.1 Understand, maintain, invest and manage the safety of our new and existing homes so as to meet the safety requirements of current and expected regulations.
6.2 Design and build new homes that put customer safety at the heart of delivery, and hand new build homes over so as to demonstrate the golden thread of information.

6.3 Listen, communicate and engage with our customers and communities, enabling them to be safe and feel safe.

#### Good Practice Indicators:

- Building Safety Working Group meets monthly to challenge, discuss, prepare and implement existing and new regulatory requirements.
- Safety Assurance Reviews largely reflect 'Reasonable' levels of assurance
- Action are tracked and lessons are learned and can be demonstrated as driving continuous improvement.
- Processes are in place to ensure new homes are handed over to SNG and customers with appropriate certification and free from safety defects.
- Portal and comms channels (In Progress)
- Promotion of and role of BSM in taller buildings, monthly on site presence.
- Targeted comms campaigns to all residents
- Residents able to request copies of certificates including FRA
- 'Easy read' fire safety/building safety documents for residents
- Locations specific community events focusing on safety (i.e. Liden blocks)

#### Element 7: Incident Management

**All Health, Safety and Environmental incidents are reported and investigated to determine system causes and identify actions, which are implemented to reduce the likelihood of recurrence and improve performance.**

7.1 Report and classify HSE incidents based on their actual and potential consequences; report to relevant regulatory body as required.

7.2 Investigate HSE incidents to establish immediate and system causes. Define actions, assign owners and due dates, and monitor actions to completion.

7.3 Analyse HSE incident data for trends, learnings and applicable actions. Share analysis, learnings and implement actions to improve performance.

#### Good Practice Indicators:

- Managers and colleagues record all applicable incidents on ESafe in a timely manner and with sufficient incident detail.
- HSE classify all Incidents for actual and potential severity in line with severity matrix.
- HSE have verified that all incident data is accurately recorded.
- Managers notify leaders of incidents, verbally or by email/text, as required depending on severity .

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- HSE Team reports RIDDOR incidents to the Health and Safety Executive within the required timescales.
- HSE or line managers have investigated all incidents as required depending on severity.
- All incidents investigations have identified one or more system causes.
- Owners of Incident investigation actions complete them within the agreed timescale based on priority.
- HSE or line managers have investigated all incidents as required depending on severity.
- All incidents investigations have identified one or more system causes.
- Owners of Incident investigation actions complete them within the agreed timescale based on priority.
- HSE review incident trend data with relevant stakeholder teams, including HSLG and PSLT, on a quarterly basis.
- Managers use the reporting function in ESafe to create incident reports for their teams and discuss results and insights with team members.
- Managers agree action plan based on the data analysis that has been shared with them or self-generated.

## Element 8: Contractor Management

**Contractors are selected based on their Health, Safety and Environmental capability, and their works and services are monitored to ensure they meet the organisation's HSE requirements.**

8.1 Identify the SNG and contractor roles and responsibilities relevant to contractor selection, and the operational management of contractors HSE practice and performance.

8.2 Select contractors using a process which includes contractors' compliance with regulations and their capability to meet SNG's HSE requirements, taking into account the commercial and HSE risks of the work.

8.3 Define contractually and verify contractors understanding of SNG's HSE requirements through pre-work mobilisation.

8.4 Monitor contractor HSE practices and performance, including incident reporting, at a frequency consistent with the HSE risk of the work, to ensure contract execution is aligned with SNG's HSE requirements.

### Good Practice Indicators:

- Managers appoint contractor managers for each medium and high HSE risk contractor prior to contract selection, and explain their roles and responsibilities through selection, mobilisation, monitoring and final review.
- Divisions in the business maintain an up to date list of contractors, SNG contract managers and representatives at the contracting companies.
- Managers define the scope of work and relevant HSE requirements, collaborating with the HSE team as required.

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- Managers or procurement issue the Supplier HSE Questionnaire to the contractor for completion
- Managers evaluate the bids submitted by potential contractors, including Supplier HSE Questionnaire responses, and select the preferred contractor.
- Managers issue the selected contractor with the relevant contract documentation, including the written contract, with the relevant HSE clauses, and where required pre-construction information.
- Managers review contractor documentation, including risk assessment method statement (RAMS), and where required a construction phase plan (CPP).
- Managers deliver a suitable mobilisation meeting prior to work starting.
- Managers implements suitable HSE inspection programme to observe contracted work in the field
- Managers deliver periodic HSE performance reviews with the contractor
- Managers ensure contractors report incidents on ESafe and discuss incident investigation learnings with contractors.

## Element 9 – Health and Wellbeing

**Business operations are managed to prevent harm to health and to promote wellbeing.**

9.1 Systematically identify hazards in the work environment that could harm health, including chemical, physical, biological, ergonomic hazards and psychosocial factors.

9.2 Assess exposures and risks from identified health hazards; implement and maintain control measures to manage them

9.3 Implement and maintain health surveillance programmes to monitor the health of colleagues who may be exposed to known health risks in their work environment.

9.4 Proactively support the occupational health & wellbeing of colleagues through campaigns and advice, including the provision of an Employee Assistance Programme and Occupational Health Service.

### Good Practice Indicators:

- Managers deliver HSE Onboarding to all new trade colleagues and ensure the trades have completed the HSE Checklist in Nemo following the onboarding.
- Managers discuss applicable role, core and task risk assessments with individual team members, verifying they understand hazards and controls relating to their occ. health
- Managers review their team outputs generated from the health surveillance programme to ensure their teams have appropriate controls to protect them from occ. health risks.
- Managers have read and understand fully the controls, safety policies, processes and procedures relevant to their team's activities.

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- Managers support health surveillance programmes for regular assessment to occupational health.
- Managers ensure their teams complete necessary assessment to adequately monitor changes to occ. health
- Managers review health assured programme insights and usage to take action where required to improve controls.
- Managers review uptake and themes from MHA and make improvements to controls if required.
- Managers actively promote programmes to be communicated regularly and signposted to colleagues for awareness and uptake.

## Element 11 – Crisis and Continuity Management

**Plans, procedures and resources are in place to respond effectively to emergency, crisis and continuity situations, to protect people, the environment, and to preserve the company's business operations, assets and reputation.**

11.1 Identify potential emergency, crisis and continuity scenarios and their likely impact.
11.2 Develop, implement and maintain emergency procedures, crisis and continuity plans and related documents to manage the scenarios identified.
11.3 Communicate emergency procedures to colleagues, contractors, customers and visitors as applicable.
11.4 Verify the effectiveness of emergency response, crisis and continuity plans through exercising them at defined intervals.
11.5 Review and update emergency procedures, crisis and continuity plans based on lessons learnt from investigations and exercises to reduce impacts.

### Good Practice Indicators:

- Leaders assess with their teams input likely potential scenarios for incorporation at review stage.
- Leaders run quarterly scenarios with their teams to identify likely impact of crisis events.
- Leaders create emergency procedures to respond to and mitigate risks identified.
- Leaders promote the visibility and use of procedures with their teams.
- Leaders regularly review emergency procedures for effectiveness
- Leaders communicate emergency procedures with colleagues.
- Leaders direct colleagues to emergency procedures as the first point of call when a crisis begins.
- Leaders collaborate in testing and crisis management reviews against a standardised framework to test effectiveness.
- Leaders run desktop reviews of emergency response quarterly to test effectiveness
- Leaders run simulation reviews 6 monthly to test effectiveness.

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- Leaders discuss crisis events and learnings with their teams.
- Leaders, following an emergency plan being implemented run a workshop to identify lessons learned for future incorporation into their procedures.

## Element 12 – Assurance, monitoring and performance

**Health, Safety and Environmental performance and management systems are monitored and reviewed to measure progress, assess compliance, evaluate effectiveness of risk controls and drive continuous improvement.**

12.1 Define and monitor leading and lagging HSE performance indicators to evaluate progress against agreed objectives and targets in the corporate plan.

12.2 Implement and maintain risk-based monitoring and assurance to verify that operating activities are being carried out aligned with Sovereign requirements and to identify areas of potential risk and good practice.

12.3 Conduct annual management reviews of the HSE management system, identifying learnings and actions to drive continual improvement.

12.4 Track to completion actions identified through management review and assurance.

### Good Practice Indicators:

- HSE team have defined and report leading and lagging indicators for HSE performance to relevant groups, including Board, EB, HSLG and PSLT.
- Relevant Groups, including Board, EB, HSLG and PSLT assess reported HSE performance data and agree interventions and actions.
- Managers undertake field inspections to verify that controls are understood, in place and operating effectively.
- Safety Assurance team executes a risk based plan of assurance reviews, identifying findings and actions to drive improvement.
- Safety Assurance Reviews evidence 'Reasonable or substantial' assurance levels
- Annual Safety Assurance Report detailing observed trends, themes over the past year.
- HSLG undertakes an annual review of the performance of the safety management system, identifying an action plan to drive improvement.
- Management teams undertake annual safety management system gap assessment according to the schedule decided by the HSLG.
- Managers complete actions assigned to them by the due date, and request extensions should there be compelling reasons for requiring additional time.
- Safety Assurance report action closure status to HSLG on a regular basis.