

Railway Housing Association Health and Safety Policy



Policy Name	Health and Safety Policy (This Policy is a legal requirement and contains 3 parts): Part 1 – Statement of Intent Part 2 - Responsibilities for Health and Safety Part 3 – Arrangements for Health and Safety
Version	1.0
Approval Status	Approved
Approved by	Railway Housing Association Board
Date of Approval	12 November 2025
Review Period	At least annually - required by law
Next Review Date	November 2026 (or earlier where required)
Duty Holder	Matthew Sugden – Chief Executive Officer
Regulatory Framework	Regulator of Social Housing (RSH) Consumer Standards Health and Safety Executive (HSE)
Legislative Framework	<ul style="list-style-type: none"> • Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Social Housing (Regulation) Act 2023 • Equality Act • Other legislation is contained within the arrangements section of this policy and within other supporting documents listed below
Links to other documents	Gas Safety Policy and Procedure Fire Safety Policy and Procedure Electrical Safety Policy and Procedure Water Safety Policy and Procedure Lift Safety Policy and Procedure Asbestos Management Policy and Procedure Damp and Mould Policy and Procedure Lettable standard Lone working Procurement Repairs and maintenance Safeguarding vulnerable adults Smoke free Stress management Violence against staff
Lead team:	Executive Team
Authorisation Meeting – Date/Time	Approved by Board, 12 November 2025
Policy Location	This document will be stored in Sharepoint

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1. Part 1 – Statement of Intent

1.0 Introduction

1.1 Railway Housing Association (Railway) has a legal requirement under the Health and Safety at Work etc. Act 1974 to have in place a suitable and sufficient health and safety policy which needs to be written down if it contains 5 or more colleagues.

1.2 To comply with this Legislation, this policy is required to have:

- **Part 1 – Statement of Intent**
- **Part 2 - Responsibilities for Health and Safety**

1.3 Railway has a statutory duty as an employer, a landlord and registered provider of social housing to ensure the health and safety of its colleagues, residents, and other stakeholders in respect of managing the health safety and wellbeing within its properties and workplaces. This policy should be read in conjunction with the other Railway policies and procedures referenced on the front page of this document.

2.0 Policy Scope

2.1 This policy applies to all Railway staff, the Board of non-executive Directors, any visitors to Railway properties (including offices), residents, contractors and members of the public who could be affected by Railway work activities.

2.2 A copy of this policy will be made available to all existing colleagues and given to all new colleagues as part of their induction training.

2.3 This policy does not form part of an colleague's contract of employment and may be amended at any time.

3.0 Health and Safety Policy Statement of Intent

3.1 In accordance with the Health and Safety at Work etc. Act 1974 and all other applicable health and safety legislation, this policy outlines Railway's commitment in managing the health, safety and welfare of our colleagues, residents, and others who may be affected by our work activities as far as is reasonably practicable.

3.2 Railway recognises and accepts our responsibilities as an employer, landlord and registered provider of social housing, to effectively manage health and safety and protect residents and any other persons who may be affected by our work activities, from any foreseeable hazard or danger; and to ensure as far as is reasonably practicable the health, safety and welfare of all colleagues, residents, contractors and any other visitors or members of the public.

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- 3.3 The application of this policy will ensure compliance with all relevant Health and Safety Legislation, regulations and guidance relating to health and safety management, which is regulated nationally by the Health and Safety Executive (HSE). The is Britain's national regulator for workplace health and safety, with the primary role of preventing work-related death, injury, and ill health. They achieve this through a variety of means, including providing advice, guidance, and enforcement action, as well as engaging with workplaces to raise awareness.
- 3.3 The application of this policy will also ensure compliance with the consumer standards, which is the regulatory framework for social housing in England introduced by the Regulator of Social Housing (RSH) in April 2024 which requires all housing providers to meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.
- 3.4 The application of this policy will also ensure compliance with the Social Housing (Regulation) Act 2023 (126A) which requires a registered provider of social housing to designate an individual to carry out the health and safety lead functions for the business as specified in section 126B.
- 3.5 Railway is committed to ensuring that it complies with all relevant health and safety legislation. Where it is reasonably practicable to do so, the Association will strive to go beyond the requirements of legislation. Railway is committed to ongoing monitoring and review of this policy and its arrangements, so that continual improvement in the management of health and safety can be achieved.
- 3.6 Our overall aims and objectives are to:
- Meet all statutory requirements to protect the health and safety of our residents, colleagues and anyone else affected by our activities
 - Provide adequate control of the health and safety risks arising from our work activities
 - Allocate adequate finances and resources to fulfil our health and safety responsibilities
 - Consult with our residents and colleagues on matters affecting their health and safety
 - Maintain properties to a standard that is fit for purpose and safe for residents to live in or for members of staff to work in
 - Operate a no smoking policy in all offices and in the communal areas of dwellings, in accordance with the Health Act 2006 and the Smoke Free (Premises and Enforcement) Regulations
 - Carry out stock condition surveys on a 5 year rolling programme
 - Provide suitable and sufficient information, instruction and supervision for colleagues
 - Ensure all colleagues are competent to do their tasks, and to give them adequate training
 - Provide adequate safety equipment and PPE as required
 - Carry out annual risk assessments for staff who are required to work unaccompanied (lone workers)
 - Use learning from accidents and near misses in order to prevent future re-

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- occurrence and embed a culture of continual learning and improvement.
- Prevent accidents and cases of work related ill health
- Maintain safe and healthy working conditions that promote wellbeing.

Matthew Sugden (Signature).....Date.....

Chief Executive Officer – Railway Housing Association



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Registered with the Regulator of Social Housing. No. A1855
Member of the Housing Ombudsman service.

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2. Part 2 Responsibilities for Health and Safety

1.0 Individual Roles and Responsibilities

1.1 The **Chief Executive Officer** is the Statutory duty holder and has overall responsibility for ensuring Railway complies with health and safety legislation requirements. The Chief Executive Officer is ultimately accountable for ensuring the Company complies with its legal obligations. Specifically, the Chief Executive is responsible for:

- Understanding the core statutory and regulatory and contractual obligations that govern the Company's business activities.
- Providing strong, visible and objective leadership on matters affecting or relating to colleague and customer health and safety.
- Setting the Company's health and safety direction using a risk-based approach with support from the Leadership Team.
- Ensuring health and safety is fully integrated into business planning and strategic decision making opportunities.
- Ensuring the allocation of sufficient competent health and safety resources.
- Supporting advice and/or recommendations from the Health and Safety Lead.
- Ensuring that a fit for purpose health and safety management system is in place.
- Liaising with Executive Directors to review and scrutinise compliance within respective Directorates.
- Ensuring Directors take ownership and are accountable for health and safety matters within their Directorates.
- Notifying the Chair of the Board of any significant matters which are likely to lead to reputational damage and/or criminal proceedings against the Company.
- Appropriately establishing downward responsibility through the Company's management structures.
- Providing regular health and safety progress updates to the Board.

1.2 The **Executive Directors (COO and CFO)** support the Chief Executive Officer by ensuring there are adequate resources within the business to enable Railway to discharge its duties in relation to health and safety management and provide suitable assurance and evidence that risks are appropriately managed. Executive Directors are accountable for ensuring the safe and effective delivery of business activities in their respective Directorates. Specifically, Executive Directors are responsible for:

- Understanding the statutory and regulatory and contractual obligations that govern their Directorates business activities.
- Providing strong leadership and instilling a positive health and safety culture.
- Ensuring health and safety arrangements are implemented, maintained and monitored across departments under their control.

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- Ensuring budgetary decisions do not adversely affect or influence the Company's core health, safety and property compliance obligations.
 - Ensuring they are astutely aware of the main risks that are generated in their respective Directorates and the main controls that are in place to effectively manage and mitigate such risks (and further ensuring these are recorded on the Company's risk management framework).
 - Supporting advice and/or recommendations from the Health and Safety Lead.
 - Formally assessing and controlling the health and safety impact of significant business change (i.e. business growth and expansion, introduction of new services, significant structural changes, service transfer etc).
 - Providing the Chief Executive Officer with regular assurance that health and safety matters are being discussed, monitored and maintained within their respective departments.
 - Liaising with Operational Managers, scrutinising compliance within respective departments.
 - Ensuring all necessary risk assessments for significant hazards which arise for areas under their control are in place and that they are suitable and sufficient.
- 1.3 **Operational Managers** are responsible for ensuring they plan, manage and execute the delivery of their service(s) in a safe and effective manner. Specifically, the Operational Managers are responsible for:
- Understanding the core statutory, regulatory and contractual obligations that govern the business activities with respective departments.
 - Providing strong leadership, advocating positive behaviours and instilling a transparent safety culture.
 - Ensuring sufficient time and resources is allocated to enable the effective planning and monitoring of health and safety arrangements.
 - Ensuring that the necessary budgets required to ensure people and/or property safety is identified and allocated.
 - Identifying and seeking support for all necessary health and safety training, which when coupled with operational experience ensures colleagues are competent.
 - Establishing and effectively communicating responsibilities for undertaking and reviewing departmental risk assessments.
 - Ensuring significant health and safety risk assessments and associated controls are effective, being adhered to and regularly reviewed.
 - Ensuring any significant risks or other safety issues that cannot be sufficiently mitigated is immediately notified to the Health and Safety Lead and responsible Executive Director.
 - Formally assessing the health and safety impact of any material change before the change is implemented.
 - Ensuring colleagues are consulted prior to any material change in working practices or working routines which may affect their health, safety or wellbeing.
 - Supporting advice and/or recommendations from the Health and Safety Lead.
- 1.4 **All Line Managers** are responsible for:

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- Ensuring this Health and Safety Policy and any associated health and safety procedures are communicated, understood and followed by new and existing direct reports (including interim and agency colleagues).
- Ensuring new starters are adequately inducted immediately upon commencing their role.
- Assessing all new colleagues (including secondments and internal transfers) prior to recruitment to ensure they possess the requisite skills (and where required, qualifications), and ensuring continual competency evaluation throughout their role.
- Ensuring all necessary risk assessments to manage hazards which arise for areas under their control are undertaken, recorded, communicated and regularly reviewed.
- Recording, investigating and reporting all accidents, incidents and near misses to the Health and Safety Lead and implementing new/revised controls where necessary to prevent re-occurrences.
- Ensuring that colleagues under their management co-operate with the health and safety requirements at all times.
- Immediately notifying the Health and Safety Lead of any engagement or correspondence from the Health and Safety Executive (HSE), Fire and Rescue Service or Local Authority enforcement.
- Incorporating health and safety into annual performance reviews, team meetings and 1:1's.
- Monitoring compliance for their respective areas through self-auditing processes and addressing any shortfalls.
- Ensuring any engaged contractors are listed on the contractor register and checking their safe systems of work is in place before commencing any work.
- Ensuring any health and safety issues and concerns raised by direct reports are addressed or where appropriate escalated within a reasonable timescale.
- Ensuring colleagues under their control are aware of any emergency procedures and arrangements in readiness for emergencies.
- Actively identifying, promoting, managing and ensuring colleagues attend/complete core H&S training in conjunction with providing them with other information, instructions and supervision as necessary.
- Ensuring safety procedures and risk assessments are reviewed with the introduction of new work processes or work equipment.
- Empowering and encouraging colleagues to think and work in a manner that constantly considers their health and safety and that of others.

1.4 **All Railway Colleagues** (irrespective of their role) are responsible for the following:

- Ensuring they are familiar with and continually adhere to this Health and Safety Policy and any issued risk assessments.
- Ensuring they co-operate with their line managers on any matters relating to health, safety and welfare.
- Ensuring they attend core H&S training and/or complete online H&S e-learning modules as required.
- Using, inspecting and taking care of any personal protective equipment issued to protect them against injury and/or ill health.

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- Ensuring tools, equipment and hazardous substances under their control are used and stored in a safe manner and commensurate to any information, instruction, guidance or training provided.
- Ensuring they take reasonable care of their own health and safety, that of their colleagues or others who may be affected by their work activities.
- Ensuring all accidents, incidents and near misses sustained are immediately reported with clear details proportionate to the severity of the event.
- Ensuring all hazards including dangerous situations are reported to their line manager (or where necessary to the Repairs Team) for remedial action.
- Ensuring any general health and safety issues or concerns are reported to their line manager or where appropriate, the Health and Safety Lead.
- Ensuring that they do not interfere with anything put in place to ensure their health and safety and that of others.
- Ensuring they report any relevant new or existing medical conditions which may affect their health/safety or that of others to their line manager and the HR Team.

2.0 Governance and Oversight Responsibilities

2.1 Railway will have suitable and sufficient levels of oversight, governance, and assurance in place to ensure that we fulfil all legal obligations relating to health and safety management and to assure ourselves that we comply with our Health and Safety Policy. The current levels of Governance and Oversight we have in place are:

2.2 **The Board of Non-Executive Directors** are responsible for:

- Ensuring it is assured that the Company is complying with its core health and safety obligations. Specifically, the Board is responsible for:
- Being familiar with the core statutory, regulatory and contractual obligations that govern Railway's business activities.
- Demonstrating strong strategic leadership and instilling a positive health and safety culture.
- Ensuring health, safety and compliance performance reports and associated key performance indicators are monitored, sufficiently scrutinised and reviewed for continual improvement.
- Ensuring it gains relevant assurance that Executive Directors are appropriately discharging their health and safety obligations proportionate to matters emerging from performance reports.
- Ensuring annual budgetary decisions or any proposals to drive efficiency savings do not adversely affect core health, safety and property compliance obligations.
- Ensuring all significant business decisions affecting the health and safety of colleagues and customers reflect the commitments prescribed in this Health and Safety Policy.
- Ensuring that Committee Members appointed onto the Audit Committee possess sufficient skills, knowledge and experience to enable them to confidently and competently scrutinise health and safety performance.
- Considering the health and safety impact of any material organisational change and ensuring that the relevant assessments are completed.

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- Supporting competent advice and/or recommendations received from the Health and Safety Lead.

2.3 **The Executive Team** is responsible for:

- Ensuring the board is well informed of Health and Safety obligations of the business as an employer and registered provider of social housing.
- Keeping abreast of sector, Legislative and regulatory specific changes that may have an adverse effect on the Company's compliance levels.
- Ensuring there is a suitable and robust reporting framework in place to obtain suitable and sufficient health and safety compliance assurance is consistently received to evidence compliance with legislation, Regulatory requirements and company policy
- Provide sufficient reporting and assurance health and safety reporting to the board which details key performance, achievements, key risks and any non-conformities.
- Ensuring it seeks assurance that there is an effective health and safety management system and strong operating health and safety culture led from the top of the business.
- Ensuring it gains assurance that the wider Management Team is proficiently managing health and safety risks within their respective teams.
- Obtaining independent competent advice and/or recommendations where required.
- Commissioning periodic external reviews and audits (as appropriate) to assess the effectiveness and performance of health and safety compliance.

2.4 **The Audit Committee** will provide support to the Board in scrutinising the Company's health and safety arrangements. Specifically, they are responsible for:

- Keeping abreast of sector and regulatory specific changes that may have an adverse effect on the Company's compliance levels.
- Ensuring that they adequately scrutinise the Company's annual health and safety report which details key performance, achievements and any non-conformities.
- Ensuring it seeks assurance that there is an effective health and safety management system and operating culture.
- Ensuring it gains assurance that the Executive Team is proficiently managing health and safety risks within their respective teams.
- Supporting competent advice and/or recommendations received from the Health and Safety Lead as required.
- Commissioning periodic external audits (as appropriate) to assess the effectiveness and performance of health and safety compliance.

2.5 **The Health and Safety Compliance Clinic** are responsible for:

- Developing and maintaining the Company Health and Safety Policies and Procedures including Landlord Compliance.
- Developing and maintaining a health and safety management system which is communicated and implemented across the Company with support and assistance from Executive Team and other managers.

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- Providing relevant interpretations of health and safety legislation (current and forthcoming), communicating any impact and proposing solutions which help enable compliance.
 - Taking a lead on investigating serious accidents/incidents, establishing root cause(s) and providing advice and recommendations on lessons learnt and future preventive measures.
 - Providing periodic reports on health and safety and compliance performance to Executive Team, the Board and Audit Committee.
 - Ensuring the Chief Executive and the relevant Executive Director is made aware of any significant accident or incident which may lead to criminal/enforcement proceedings against the Company.
- 2.6 **The Health and Safety Lead** provides an advisory, support and monitoring function to assist managers in fulfilling their duties. The Health and Safety Lead will be responsible for:
- Developing and maintaining the Company Health and Safety Policy.
 - Developing and maintaining a health and safety management system which is communicated and implemented across the Company with support and assistance from Executive Team and other managers.
 - Providing relevant interpretations of health and safety legislation (current and forthcoming), communicating any impact and proposing solutions which help enable compliance.
 - Providing competent advice to colleagues on matters relating to people and property related health, safety and compliance.
 - Taking a lead on investigating serious accidents/incidents, establishing root cause(s) and providing advice and recommendations on lessons learnt and future preventive measures.
 - Providing periodic reports on health and safety performance to the Board.
 - Ensuring the Chief Executive and the relevant Executive Director is made aware of any significant accident or incident which may lead to criminal/enforcement proceedings against the Company.
 - Ensuring matters relating to serious non-compliance issues are reported back to the Chief Executive Officer.
 - Taking all necessary and immediate action in the event of a serious injury or fatality with the support from the Chief Executive Officer.
 - Ensuring serious injuries, diseases and dangerous occurrences are notified to the Health and Safety Executive in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
 - Instructing the cessation of any activity perceived as being high risk and likely to cause imminent risk of injury or ill health to colleagues and others who may be affected.
 - Undertaking planned and short notice inspections, audits and other forms of checks to assess the levels of compliance across Railway.

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- Working closely with the Property Team to ensure appropriate and relevant H&S training is being provided.
 - Commissioning periodic external audits (as appropriate) to assess the effectiveness and performance of health and safety compliance.
- 2.7 **The externally appointed third party auditor** will be instructed to complete independent assurance review and audits as required with scope and direction agreed with Railway to give independent assurance that Railway are compliant with legislation, their policies and industry standards.
- 3.0 Monitoring and Review**
- 3.1 Health and safety is a high priority for Railway, and this policy will be reviewed every year, or sooner if there are any legislation changes, changes to the management arrangements, if there is a significant failing within the management arrangements, after a significant incident or if it is believed the Policy or Arrangements are no longer suitable or robust.