

Health and Safety Management Control Framework

April 2023

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Staff Affected	All Employees
Business Owner(s)	Head of Safety and Facilities
Approved By	Safe and Strong Group
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Always refer to documents stored on the Intranet when applying policy and procedure.

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1. Introduction

- Safety is our number one priority in our Corporate Plan. As part of Safety at Heart, being serious about safety forms a major part of 'Tenants at Heart'.
- We will, as far as is reasonably practicable, ensure the health, safety and welfare of our customers, colleagues, and others who are affected by our work. This means understanding and analysing hazards and putting in place controls to reduce them to an acceptable level.
- This will be achieved by an ongoing management framework detailed in this document which is based on HSG65 – Managing for Health and Safety. This model has been created by the Health and Safety Executive (HSE) and achieves a balance between systems and behavioural aspects of management and follows the Plan, Do, Check, Act approach.
- This framework applies to all colleagues, and anyone affected by our work including customers, visitors, contractors and members of the public.

2. Core Elements

- We know that there are core elements to ensuring good health and safety management and a positive safety culture which are backed up by a range of internal policies, procedures, guidance and framework documents such as: Health and Safety Policy, Risk Management Policy, COSHH Procedure, Staff and Contractor Competency Framework, Risk Alert Procedure, First Aid Guidance, Display Screen Equipment Guidance, Working at Height Procedure and Code of Professional Conduct.

Legal Duties

Many of our legal duties are made under the Health and Safety at Work etc. Act 1974 which covers very broad duties. The Management of Health and Safety at Work Regulations 1999 requires us to put in place arrangements to control risks.

These legal duties are achieved as follows:

Requirement	Detail of how legal requirement is met
Documented H&S Policy	Reviewed annually and published on the intranet
Assessments of risk	Managers are trained and supported in taking ownership over the day-to-day H&S risks posed in their work activities, this includes the provision of risk assessments. Higher risk areas are assessed by the H&S team.
Access to competent advice	The H&S team provide competent advice. The Head of Safety and H&S Manager hold suitable Membership of the Institute of Occupational Health and Safety, and other members hold varying levels of membership.
Information for colleagues	Employees are provided with information about the risks from work in various ways, through training, induction, updates and guidance.
Training and supervision	Training is provided both internally and externally and is arranged by our dedicated Talent team. Training compliance is measured and reported through our governance framework.
Consultation	Colleagues are informed & consulted on safety matters through safety committees, regular meetings, staff representatives (Colleague Champions) and ongoing communications that involve front line staff.

Many other regulations under the Act have an impact on our work, changes and updates are monitored in co-operation with our Corporate Affairs team.

3. Systems of Management

- The 'Plan, Do, Check, Act' model is a continual tool for safety management which integrates with other systems in place. In order for it to work, it must be maintained and will constantly evolve to take into account new processes and changes to those already developed.



Plan

- Policy
- Planning

Policy

We have a health and safety policy as required by law. This is published on the intranet, and the statement of intent is displayed in each workplace.

Various other procedures exist to clearly describe aims and objectives, ensure that all colleagues are aware of what is expected from them and how we meet our obligations under the law, such as 121's, annual performance reviews and the code of professional conduct. These are monitored & reviewed by the Corporate Resources Directorate.

Planning

Adequate control of risk relies on coordinated action through the organisation and effective systems being implemented. Through proper planning we aim to go beyond legal compliance to 'Tenants at Heart', with regard to health and safety, this means creating a safe work environment with a positive and continually improving safety culture.

We have a dedicated health and safety team. One of its core functions is to design, develop and implement suitable and proportionate evidence-based risk management arrangements, which are determined from high-risk work activity and trends from incident reporting data.

As part of our planning arrangements, we will measure the safety culture using established safety climate tools to benchmark where we are, and better plan where we need to be.

Risk Profiling

Our risk management arrangements seek to be proportionate to the level of risk presented. The safety landscape of the business is continually profiled to ensure that risks are identified and resources are allocated appropriately.

Most risks in our business are of low-risk nature, by profiling we are able to ensure that the higher risk areas of our business – such as our in-house maintenance team and Building Safety Requirements – are well managed and prioritised.

The health and safety team work with the subject matter experts in the business and draw on their knowledge and competence to ensure that risk profiling is suitable and sufficient, as defined in official guidance and best practice. Where necessary contractors are used for higher risk assessments and profiling, such as asbestos management and legionella.

Do

- Risk profile
- Organisation
- Implementation

Organisation

Co-operation and employee involvement

We recognise that all colleagues need a clear line of communication to report concerns about health, safety and welfare. This is fundamental to a positive safety culture. This is achieved through:

- Colleague Champions
- Active presence of H&S Officers in the workplace
- Toolbox talks and safety briefs
- 1-2-1's and management supervision
- Ask the Exec and engagement events

Contract Managers work within our contract management and procurement framework to ensure that co-operation with contractors is maintained. This is generally supported through regular contract management meetings.

Responsibilities

This section provides a summary of the H&S duties and responsibilities of key roles.

Executive Director of Corporate Resources: Responsible for senior level oversight, setting the direction of and implementation of the health and safety function. This role also ensures the Board, Executive Team and Audit and Risk Committee are kept up to date of high-level developments.

Head of Safety and Facilities: Is responsible for development and maintenance of health and safety policies and procedures and monitors the implementation of the health and safety framework. This role also represents the health and safety at director level and has overall management control over the H&S Team. Together with the H&S Manager provides 'competent advice' as required by the Management of H&S at Work Regulations.

Health and Safety Manager: Is responsible for the day-to-day management of the H&S team, audit function and the production of health and safety policies and procedures. Assists the Head of Safety and Facilities with the provision of competent advice.

Health and Safety Officers: Assist with the review of policies and procedures, undertake audits, advise colleagues and investigate accidents and near misses. They also assist the business in risk management measures.

Colleague Champions: Act as a link between frontline colleagues and the executive team to feedback, raise concerns and challenge where necessary.

Managers: Are responsible for the day to day risk management in their areas, as well as the monitoring of controls. Managers also report all accidents and near misses to the H&S Team.

Colleagues : Have a legal duty to take reasonable care of themselves and others, co-operate with their employer and contribute to a positive safety culture.

Competence

We know that competency is key to maintaining a safe working environment. Competency is achieved by ensuring the correct level of experience, skills, knowledge and behaviours commensurate to our work activity are in place and maintained. Competency is considered throughout the employee journey from recruitment and induction – continuing through on-going development.

The Talent Team, Health and Safety Team and line managers work collaboratively to ensure colleagues are competent.

Experience can be proven through previous employment, and/or developed during employment. Experience is also developed and recorded through 1-2-1's and the MPD process.

Skills and knowledge are actively developed through training, both on the job, in-house or using external suppliers. When external providers are used, arrangements are made to ensure that the trainer has sufficient awareness of our business and practices. We accept that people learn in different ways, therefore training is delivered in a variety of methods from on-line e-learning to in-person classroom training and other mediums, which are arranged via annual training budget setting and the 'My Learning' in-house portal.

Behaviours which contribute to competence are driven through our wider corporate plan and are promoted throughout the recruitment process, 1-2-1 process and MPD's.

The Talent function ensures that competence is defined for key roles, and where refresher training is needed this is arranged via a competency matrix.

Contractor competency is managed through a contractor health and safety competency framework. Each contract has a contract manager who ensures, through appropriate management intervention, compliance of relevant duties concerning health and safety.

Communication

Health and Safety is communicated through various means, dependent on the urgency and severity of the message. These can range from emails, physical media such as posters and leaflets, personal delivery via toolbox talks, 1-2-1's and team meetings, staff away days, induction packages, training and intranet articles. Where necessary these are made mandatory read articles.

Implementation

Following the identification of relevant risks, control measures are then implemented. These are primarily controlled through safe working practices detailed in risk assessments and work procedures.

In the first instance local managers are responsible for the implementation and monitoring of these processes. Fundamental to these processes is ensuring that the paperwork and effort involved in implementation is proportionate to the risks posed.

For all our relevant risks we apply the standard principles of hierarchy of control:

- Elimination – physically remove the hazard
- Substitution – replace the hazard
- Engineering controls – isolate people from the hazard
- Administration controls – change the way people work
- PPE – protect the worker with equipment

Risk Assessment training and guidance is provided to all managers via direct engagement with the health and safety team and a series of risk assessment templates containing a list of potential controls relevant to our general work activity. Examples of these templates can be found at: [Risk Assessments - The Intranet \(midlandheart.org.uk\)](https://midlandheart.org.uk).

Additionally, the health and safety team produce and upkeep guidance documents for some of our more common risks which provide employees with further ongoing advice. These include (but not limited to):

- Working at height [Uploader.ashx \(midlandheart.org.uk\)](#)
- Lone working [Uploader.ashx \(midlandheart.org.uk\)](#)
- COSHH [Uploader.ashx \(midlandheart.org.uk\)](#)
- Manual Handling [Uploader.ashx \(midlandheart.org.uk\)](#)

Safe working practices are used to communicate controls for lower risk activities, detailed in induction, training, supervisions, assessments and procedures whilst more risky activities such as working at height and those concerning COSHH are detailed in our **safe systems of work**.

Occupational health services are delivered through partnership with a Partner who is able to provide occupational health assessments for more complicated events. Low risk assessments such as standard DSE checks are carried out in-house and referred to our partners when significant issues are identified. Health declarations and screening are also incorporated into the onboarding systems.

Maintenance programmes are undertaken proactively and include all statutory programmes of inspection and certification. These are routinely managed by facilities in office environments and by the assets and building safety teams in building stock.

Check

- Measuring performance
- Investigation

We measure how we are performing and investigate accidents, near misses and dangerous occurrences to understand the root cause.

Monitoring

Monitoring is undertaken to ensure that our controls are working, and key areas are fed back to board level as well as to those colleagues it concerns.

Active Monitoring

Active monitoring is carried out by a variety of teams across the business and includes:

- All building safety compliance checks on life safety systems, gas, electrical systems, legionella monitoring, lift inspections and asbestos checks etc.
- Routine management checks such as reviews of kitchen records, housekeeping checks and inspections.
- Continuous audit process
- Review of H&S policies and procedures
- H&S audits of key risk areas
- Review of risk registers
- Training compliance monitoring

Reactive Monitoring

We undertake reactive monitoring following accidents and near misses. All accidents, near misses and dangerous occurrences are reviewed and investigated by a safety professional. This allows for underlying and immediate cause analysis to feed into comprehensive actions to mitigate further risk.

Cases of work-related ill-health are also monitored by our HR colleagues to identify any trends and issues arising.

Act

- Review performance
- Learn lessons

The results of meaningful checks on health and safety systems must be acted upon in a timely manner in order to capitalise on the attention given after an adverse event.

We recognise reviewing performance is critical to effective safety management.

Reviewing Performance

Performance is reviewed through relevant forums in our governance structure including: Board of Management, The Executive Board, Audit & Risk Committee, the Safety at Heart Forum and the H&S team. Reports are developed monthly or in line with any forthcoming meetings. This allows for assurance that the systems for managing safety are working, we are complying with the law and responding to any changes in the risk profile.

Learning Lessons

We recognise the importance of learning lessons from accidents and near misses as well as organisational vulnerabilities identified during monitoring, audit and review.

Following serious events, and trending events, we routinely convene cross disciplinary groups to ensure lessons are identified, acted upon and monitored.

4. Levels of assurance and governance

Levels of Assurance

The strategic planning & assurance team own the assurance framework and continuous auditing program. The H&S team deliver a program of thematic audits aligned to the assurance framework. The three main levels of assurance are detailed below.

<p>First line of defence</p> <p>Management controls 'Checks and balances'</p> <p>Midland Heart:</p> <p>Management controls Governance & Control Framework Policies & Procedures</p>	<p>Second line of defence</p> <p>Risk oversight Reviews First Line activities Technical/regulatory compliance</p> <p>Midland Heart:</p> <p>Risk Management <i>Assurance</i> Health & Safety Quality</p>	<p>Third line of defence</p> <p>Independent assurance over the adequacy and effectiveness of the First and Second line.</p> <p>Midland Heart:</p> <p>Internal audit Housing Regulator Other external bodies</p>
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Governance

Health and safety matters are controlled and led through the various strands of the governance framework. Health and safety is a standing agenda item in key meetings, specifically:

- Midland Heart Board (Monthly)
- Audit and Risk Committee (Quarterly)
- Executive Team (Monthly)
- Safety at Heart Forum (Quarterly)

The Safety at Heart Forum oversees delivery of our safety priorities as detailed within Tenants at Heart and the associated annual delivery plans. The Committee also considers our response to changes in regulation or our operating environment. These committees involve employee representatives and colleague champions and typically discuss:

- statistics on accident records, ill health, sickness absence.
- accident investigations and subsequent action.
- inspections of the workplace by enforcing authorities, management or employee health and safety representatives.
- risk assessments.
- health and safety training.
- emergency procedures; and
- changes in the workplace affecting the health, safety and welfare of employees.