



Health and Safety Policy

February 2026

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1. Health and Safety Policy Statement

It is the policy of Oxford City Housing Limited (OCHL, the company) to ensure, so far as is reasonably practicable, the health, safety and welfare of all staff, contractors and visitors impacted by our services and activities using the 'PDCA' framework (Plan-Do-Check-Act) to drive continuous H&S improvement.

As a wholly owned subsidiary of Oxford City Council (OCC), the company is subject to and complies with the Health and Safety policies of the Council, a link to which is to be found at the end of this policy.

We aim to accomplish this by:

- Providing strong leadership and management in the development and implementation of robust health and safety policies and practices.
- Promoting the principles of sensible and proportionate risk management.
- Ensuring that any place of work in which contributing staff work is in a condition that is safe and without risks to health. Facilitating a working environment for our employees that is without risks to health and adequate in regards with the arrangements and facilities for their welfare at work.
- Where relevant, providing and maintaining plant, tools and systems of work that are safe.
- Ensuring staff are trained in the safe handling, storage and transport of articles and substances, and that safe working practices are observed at all times.
- Providing relevant and up to date information, instruction, guidance, and training to ensure the health, safety, and welfare at work of our contributing staff.
- Bringing to the attention of all colleagues that they as individuals have a legal personal responsibility to take care of the health and safety of themselves and others, such as members of the public, or colleagues who may be affected by their work.
- Compliance with the Health and Safety at Work etc. Act 1974, Construction (Design and Management) Regulations 2015 (CDM), and all other relevant UK legislation.
- Equipping leaders and managers with the knowledge, capability and skills to be able to effectively identify and manage their health and safety responsibilities.
- Provision of competent advice including technical advice on Health and Safety matters to all staff.

OCHL will strive to achieve these aims by integrating safety management into all levels of service planning and delivery. To help achieve its aims, we will provide oversight and governance through The Board, Audit, risk and governance sub-committee. OCHL recognises that high standards in health and safety are of equal importance and complementary to delivering value for money performance.

A copy of this policy will be available to all staff on SharePoint and the Ox Place Website, the policy applies to all OCHL employees, OCC employees working on behalf of OCHL, contractors, agency staff and visitors.

A handwritten signature in blue ink, appearing to read 'A. Howson'.

Signed

OX Place Managing Director

Dated : 5th March 2026

This policy will be reviewed annually or when there has been any significant change in staffing or work environment. The next scheduled review date is **February 2027**.

2. Roles and Responsibilities

Managing Director (OCHL)

The Managing Director has overall responsibility on behalf of the Board for ensuring the implementation and application of this Policy, and the health, safety and welfare of all staff working on behalf of OCHL, contractors and visitors impacted by our services and activities.

The MD is responsible for ensuring that the Board are kept informed of the state of compliance within the organisation and the effectiveness of resource provision to achieve those requirements.

The MD is responsible for ensuring that all relevant staff are made aware of their health and safety obligations and that they carry them out in a safe and proper manner as detailed in the Policy or other related documents.

The MD has the responsibility to:

- Ensure compliance with CDM 2015,
- Allocate adequate resources for health and safety management.
- Review incident reports on a regular basis and ensure that any required corrective actions are implemented.
- Report all Health & Safety monitoring to the Board on a regular basis
- Take an active leadership role in safety management, ensuring there is appropriate performance management and monitoring;
- Ensure sufficient resources are in place to manage health and safety risks;
- Maintain appropriate health and safety risks in the strategic Risk Register;
- Support and monitor the safety performance through the management structure appraisal process and ongoing 1:1'
- Ensure that OCHL have access to competent people via OCC or directly to provide health and safety assistance and advice;

- Personally respond to any legal notice received by the HSE or other enforcing body (although the MD may assign this requirement to the most appropriate colleague to work with the relevant officer throughout any investigation and/or correspondence).

Board and sub committees of OCHL

The Board forms the corporate body for the company and has collective and individual responsibility for planning, resourcing, and overseeing the company's activities. Collectively, the Board, with the Executive Management Team, forms the decision-making body of the company in the provision of its services and in the conduct of its undertaking.

Board members will therefore:

- Endorse the Health and Safety Policy, which commits the organisation to the principles of good health and safety management;
- Ensure that suitable resources and strategic direction are available to discharge the Company's health and safety responsibilities;
- Consider health, safety, and welfare issues as part of their decision-making process. And promote a positive health and safety culture;
- Monitor, via reports, the overall performance of the company's health and safety.;
- Appoint a board health and safety champion;
- Follow all Health and Safety Guidance provided to ensure their own safety when carrying out all duties relating to company activities and to promote a positive health and safety culture by leading by example.
- Undertake the same health and safety training as undertaken by the staff.

Executive Management Team

Members of the Executive Management Team (EMT) have a responsibility to:

- ensure that the Health and Safety Policy and the Health and Safety Standards are understood and implemented;
- understand health and safety legislation and its application to the Company's services and activities;
- ensure that adequate resources are included in budgets, business plans and staffing levels to provide safe places of work and safe systems of work and to implement the Health and Safety Policy and the Health and Safety Standards;
- ensure that effective means of communication are established, and that health and safety is included in all relevant meetings;
- review performance data from each team area;
- consult on new initiatives, communicate lessons learned and maintain best practice;

The EMT will specifically review Health, Safety and Compliance as a standing agenda item with their own teams

Employees (and council employees working for the company)

All employees have a responsibility to act in a manner to protect and promote their own health and safety and that of colleagues, members of the public, contractors and others and must:

- take reasonable care, for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work;
- attend all mandatory training, read documentation provided and put into practice all instructions to ensure effective safety;
- initiate risk assessments when required to cover activities carried out in the workplace;
- follow prescribed safe systems of work and control measures identified in risk assessments;
- report all accidents/incidents, near misses and hazards immediately to their line manager;
- use vehicles, equipment, materials or substances in accordance with information, instruction and training provided and report any defects;
- Identify any requirement in line with H&S training and wear any personal protective equipment (PPE) that is required or has been provided and not to misuse or interfere with it;

- Set a good personal example in respect of health and safety.
- make suggestions where appropriate to improve health and safety;
- ensure that when driving while at work that they are fit and able to do so, they have completed the drivers' risk assessment. Employees must, have business insurance and drive in a safe and proper manner in accordance with the latest legislation and comply with the company's Travel and Driving Policy
- Please note that these responsibilities relate to all employees and contractors. If an employee has additional post holder responsibilities for health and safety, for example, they are a manager, then they must comply with those responsibilities in addition to these;
- raise any health and safety concerns through their line managers in the first instance, if they cannot be resolved or actioned by themselves;
- Ensure if working from home, that their home working environment is safe. If they have any concerns about home working, they should be raised with their line manager.

Staff with Construction Design and Management (CDM) Responsibilities

CDM stands for Construction Design and Management Regulations and affects everyone involved with commissioning, designing, or executing a construction project. As an agency of the Council, OCHL is required to appoint a Principal Designer and a Principal Contractor when carrying out work. Staff working on behalf of OCHL are responsible for ensuring that proper arrangements for managing the project safely are put in place and reviewed throughout the life of the project.

Staff with CDM responsibilities must:

- Undertake CDM training and ensure they understand their responsibilities and that of the duty holder role they are undertaking;

- Ensure their work activities comply with CDM regulations;
- Follow the detailed guidance provided in the OCC/OCHL CDM Health and Safety standard and corresponding intranet page.

3. General Arrangements

These general arrangements align with OCC's H&S policy

Standards

- OCHL will comply with OCC standards. These have been developed as a series of Standards (previously Codes of Practice), which are regularly reviewed, that detail safe working practices and procedures. These can be found on the [Council's intranet](#).
- All colleagues should be aware of and uphold the standards, and the responsibility for putting these into practice resides with their immediate managers.

Risk Assessment Standard

- The MD, EMT and Managers will ensure that suitable and sufficient risk assessments are carried out in consultation with relevant staff. EMT will ensure that all risk assessments are conducted using the risk management system. Risk assessments are to be reviewed annually or sooner if there is a significant change or as need dictates.
- For higher risk work, an activity-specific risk assessment must be carried out. Specific risk assessments can be for a particular task, job role, or person.
- When a member of staff has declared a disability or a pre-existing medical condition that may be adversely affected by the work activity or is a new or expectant mother or is a young person (under 18 years of age) then a specific risk assessment will be carried out.

Safe Systems of Work (SSOW)

- Whenever a Risk Assessment has been carried out and a significant risk has been identified, then a SSOW needs to be completed. This sets out a safe system in which the activity should be carried out. Relevant staff should be provided with copies of or have access to the SSOW relevant to their work area or activities as well as being given advice, guidance and direction to enable them to follow the SSOW.
- Where there are SSOWs, these will need to be reviewed during the risk assessment process. These may also be known as risk assessment method statements (RAMS), especially within the construction environment.

Emergency Procedures (Including Fire Safety)

- Emergency Procedures and Response Plans will be available to staff, contractors and visitors for OCC-managed properties, which includes staff working on behalf of OCHL. Additional plans will be created and communicated when it has been determined that additional hazards exist (other than the fire), such as bomb threat, flooding etc. The Plans will be an integral part of the Business Continuity Arrangements. The OCC Building Manager will be responsible for ensuring these

plans are in place.

- The OCC Property Safety and Compliance Manager should ensure that a Fire Risk Assessment has been undertaken in respect of all the premises the Council is responsible for.
- The validity of each Fire Risk Assessment shall be reviewed annually or in light of any changes in legislation, employee numbers, or requirements that may affect the suitability of the assessment. It is the Council's policy that smoking is prohibited in all places of work, including vehicles.

[Accident/Incident and Near Miss Reporting, Investigation and Monitoring](#)

- All accidents/incidents and near misses shall be recorded and submitted via the [Health and Safety System Awaken](#). Managers will investigate all accidents/incidents and near misses to establish whether additional procedures are needed to prevent the likelihood of recurrence. Risk assessments, SSOW, training, instruction, or levels of supervision may need to be reviewed following the investigation. More information is available on the [Accident, Incident and Near Miss Standard](#).
- Periodically, managers must review the accidents and incidents that have occurred in their service areas to try and identify any trends. Where a trend has been identified, remedial action shall be investigated. Accident/Incident statistics are reviewed by EMT
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) specifies some work-related injuries which have to be reported to the HSE. EMT will submit RIDDOR reports, when required, on behalf of the company.

[Mental Health and Stress](#)

- Mental health and managing stress at work are key elements of health and safety provisions. The OCC [Health and Wellbeing Policy](#), applies to all staff, including those working for OCHL, and provides a practical framework for the management of mental health and stress at work. Support and guidance are available from the People Team, including the Occupational Health and the Employee Assistance Programme (EAP) via an SLA.
- Supervisors are encouraged to include stress in their team assessments and ensure working methods that avoid excessive exposure to stress. EMT shall be assisted to recognise signs of stress and monitor related staff absence and behaviour. Individuals are encouraged to report symptoms of stress to their line manager. Any employee identified with work-related stress will be fully supported by the Company.

[First Aid](#)

- The Council ensures that nominated first aiders are suitably trained and that a fully maintained first aid box of suitable size and quality is available to staff whilst at work. Notices will be displayed to identify the first aid contact and equipment location. More information can be found on the [intranet](#).

[Induction, Training and Competence](#)

- The Council provides [health and safety training](#) to enable staff to discharge their responsibilities, and this is administered and monitored by managers and the OCC Health and Safety Team. All staff are required to have satisfactorily completed the

appropriate training in line with their job requirements within an agreed time period. Training is available via Awaken Learning, and specific needs are met by specialist providers.

- All new starters with the Council are required to complete the induction checklist, which includes a section on health and safety. Additionally, as part of their local induction into specific areas of work, staff must be shown by their manager the relevant standards, risk assessments and safe systems of work for their job. They must also be instructed in fire safety, first aid, and accident reporting procedures. For staff in operational roles, localized inductions covering the Council's safety practices and procedures should be carried out before any work activity is undertaken.
- Managers, including OCHL EMT, are required to undertake H&S training for Managers on Awaken. Training compliance is reported and monitored by the OCC People H&S Board and must be reported to OCHL Board.
- Those with specific Health and Safety responsibilities should undertake training in line with industry best practice and following on from an assessment of need.

Provision, Inspection and Maintenance of Work Areas and Equipment

- Workplaces and equipment will be suitable for the purpose and, as far as is reasonably practicable, free from risks of injury. Only those with relevant training and competency shall be permitted to operate the work equipment. The Board of OCHL must adopt review mechanisms to assure itself that this is in place for colleagues working on behalf of the company.
- Where the safety of workplaces and equipment is dependent on proactive inspection and maintenance, a programme will be established for a competent person to carry out the necessary work. All appropriate records and relevant test certificates will be maintained and monitored during workplace inspections. All equipment noted to be defective will be removed from use until repaired, replaced or destroyed as applicable.

Control of Contractors

- The company instructs contractors to carry out work on its behalf. A contractor is anyone who carries out work on behalf of OCC and its subsidiaries. All staff who instruct contractors should follow and apply the OCC Health and Safety Standard for Contractors

Personal Safety and Lone Working

- Personal Safety and Lone Worker Safety is important to the Company, so all staff are required to undertake a Personal Safety and Lone Working eLearning Course available on Awaken.
- The company and OCC aim to have a workplace free from harassment and abuse, which includes (but is not limited to) homophobia, biphobia, transphobia, racism, sexism, ageism or harassment or abuse on basis of disability, marriage or civil partnership, pregnancy or maternity, religion or belief. We aim to manage unacceptable behaviour in a manner that protects our staff, volunteers, and members

of the public. If there are any instances, the employee should report them to their manager to seek additional support.

- Lone working should be avoided when possible, however for staff that do work alone a risk assessment should be undertaken and suitable control measures need to be in place. Some required control measures are outlined on the caution list.
- Using a Lone Working Device or App is encouraged to ensure a lone worker can escalate a problem quickly to get support and help.
- More information can be found on our [Personal Safety and Lone working Standard](#).

Display Screen Equipment (DSE)

- All staff who use Display Screen Equipment are required to undertake DSE Training and conduct a DSE assessment annually. When required, additional equipment may be brought by the manager to ensure a good DSE set up. Free eye tests are available for DSE users. More information can be found on the [DSE standard](#).
- A separate DSE assessment should be conducted for the homework station and the office workstation where relevant. Employees should read the OCC Flexible Working Policy regarding Home working and raise any concerns about working from home initially to their line manager.

Health Surveillance

- Health surveillance is required for certain roles in the Company who are exposed to specific risks these include but are not limited to:
 - night working;
 - exposure to construction dusts;
 - exposure to lead;
 - noise;
 - vibration;
 - dangerous chemicals or biological agents;
 - asbestos;
 - silica dust.

More information is available on the [Health Surveillance Standard](#) available on the OCC intranet from December 2024.

- Managers should refer employees requiring Health Surveillance to Occupational Health which is covered under an SLA.

Control of Substances Hazardous to Health (COSHH)

- All substances that are categorised as hazards to health should have a COSHH assessment in place. Those ordering materials are responsible for obtaining a material safety data sheet and for passing it to the relevant person to write the COSHH assessment. The findings of the assessment, control measures and necessary precautions (and any emergency procedures) must be communicated to all those using the substance. Managers need to ensure appropriate training is provided for staff.

- Substances hazardous to health must not be mixed and stored safely in a locked cabinet or cupboard.
- More information is available on the [COSHH Standard](#).

Manual Handling

- Manual handling should be avoided where possible through the use of mechanical lifting aids or alternative assistance. If manual handling needs to be conducted, a risk assessment should be carried out with consideration given to the task, the individual, the environment and the load and staff should be suitably trained. More information is available on the [Manual Handling Standard](#).

Noise

- The company will work with the council to assess and identify measures to eliminate or reduce risks from exposure to noise.
- Where required hearing protection is provided and used, any other controls are properly used and information, training and health surveillance is provided.
- More information is on the [Noise Standard](#).

- **Sharps**
- Managers should assess and identify measures to eliminate or reduce risks from exposure to sharps where the risk is foreseeable.
- Training should be undertaken for those who are exposed to sharps within work.
- More information is on the [Sharps Standard](#).

Working at Height

- Working at a height should be avoided when possible. When this is not possible, it needs to be suitably planned. Having a suitable and sufficient risk assessment and safe system of work and supervision is in place. Staff that work from height must undertake training.
- Ladders and equipment used whilst working at height will be inspected in line with statutory guidance.
- More information can be found in the [working at height standard](#).

Landlord Duties

- OCC as a Corporate Landlord is responsible for ensuring all premises are safe for its tenants and staff. This includes (but is not exclusive to) managing Asbestos, Fire Safety, Legionella, Electrical systems, Gas Systems, and lifting equipment.

Driving

- Company staff may drive their own, company or council owned Bicycles, Scooters,

Cars and Vans when working for the Company. Drivers of vehicles are responsible for ensuring that they are maintained in a road worthy and safe condition and that any defects are reported and rectified in a timely manner. Drivers must have relevant business insurance for their car.

- The use of phones while driving is prohibited. Drivers are strongly recommended that operating satellite navigation devices is best undertaken when stationary.
- More information can be found in the [Driving Standard](#).

PPE

- PPE should be provided to staff when set as a requirement by a risk assessment.
- Where it is deemed that PPE is necessary, it shall be considered for ergonomic design and shall be assessed for the relevant BS or EN standard applicable to the task. Staff should be trained in the use, storage, handling, and maintenance of PPE.
- More information can be found in the [PPE Standard](#)

4. Health and Safety Performance

- Proactive and reactive performance indicators will be used to monitor safety performance of the Company and the contractors employed. Monthly site meetings and/or updates will always have Health and Safety as a standing agenda item and a clear Incident Log or Register will be maintained to capture the H&S information provided at the site meetings. Non-site based events will be added to the overall register as and when required. There will be a written update against all H&S KPI's provided each month to EMT which will be collated and summarized into a report to the Board via ARG. All H&S learning points identified as a result of any issues recorded will be circulated to all staff.
- Upon handover of a property, a "hot handover" checklist will be provided detailing all health and safety requirements along with the requisite documentation. The company will ensure that all assessments listed in the checklist are completed prior to handover. Completed checklists are shared with OCC, including links to the shared drive where all certificates and documentation (e.g., health and safety files, gas safety certificates, electrical certifications, fire safety tests, EPCs) are stored.
- KPI's for reporting will be:
 1. **Total Recordable Incident Rate (TRIR):** This KPI measures the total number of work-related injuries, illnesses, and fatalities per hours worked. It provides an overall picture of safety performance and helps identify trends and areas for improvement.
 2. **Days Away, Restricted, or Transferred (DART) Rate:** This KPI tracks the number of days employees are away from work, have restricted duties, or are transferred due to workplace incidents. It helps assess the impact of injuries on workforce productivity.
 3. **Near Miss Reporting Rate:** This measures the number of reported near-miss incidents, reflecting proactive hazard identification and the effectiveness and

adherence of safety training.

4. **Safety Training Participation Rate:** This KPI measures the percentage of employees who have completed mandatory safety training within a specific period. It indicates the organization's commitment to safety and preparedness.
 5. **Safety Audit Compliance:** This tracks the percentage of compliance with safety standards during internal safety audits or inspections. It helps ensure that safety protocols are being followed.
 6. **Employee Safety Observations:** This measures the frequency of safety observations made by employees and the subsequent interventions implemented. It encourages a culture of safety and accountability among workers.
- Managers will ensure that where their direct reports have specific health and safety duties, these form part of the normal 1:1 performance management process and provide an opportunity to raise health and safety concerns.

Health and Safety Audits

- A health and safety internal audit regime will be established. Suitably qualified agents will carry out an audit at least every 2 years. Where the audit identifies that a team or service area has actions to complete, progress with those actions will be monitored through the normal 1:1 performance management process with the relevant manager.
- Health and Safety audits will be delivered as part of the internal audit programme.

Health and Safety Inspections

- EMT will ensure that Health and Safety reporting is completed. Frequency will be dependent on the regularity of site meetings and the activity in progress. Where a risk identified through reporting is deemed to be high, or the number of incidents is excessive, additional action and/or monitoring and controls will be implemented so that the issues can be identified and resolved.
- It should be noted that Union Safety Representatives have the right to carry out their own separate safety inspections, which when conducted should be reported to the Board.

5. Record Keeping

Adequate, accurate and consistent health and safety records shall be maintained. Managers are responsible for ensuring that there are suitable and sufficient records for their team. Other records should be electronically recorded including:

- All risk assessments should be stored on Awaken. When a risk assessment relates to an individual, it should be kept securely in line with GDPR;.
- All SSOW should be stored by the relevant manager;
- Statutory and manufacturers recommended inspection records should be kept by the responsible person. OCC Property Services will hold building safety records;
- Records will be maintained identifying the Health and Safety training received with dates and refresher frequencies. Managers should hold records that the

staff members have seen and understand the relevant risk assessments, standards, and SSOW. Training courses booked via the Health and Safety Team or completed on the learning platform will be recorded centrally;

- Copies of all audits and inspections will be centrally retained
- Accident and incidents forms must be or submitted via the OCC Health and Safety system or sent by hard copy to OCHL for retention
- Copies of any correspondence with the HSE or other enforcement authority relevant to the service area and should be reported to the OCC Corporate H&S Team immediately.

6. Further information

Link to OCC Health and Safety policy.

[Oxford-City-Council-Health-and-Safety-Policy.aspx](https://www.oxford.gov.uk/oxford-city-council-health-and-safety-policy.aspx)