



# Ongo's Health & Safety Policy & Framework

## March 2025

Owner: Chief Executive Officer

| <u>Version No.</u> | <u>Purpose/Changes</u>      | <u>Approval Date</u>     | <u>Approved By</u>             | <u>Suggested Review Date</u> |
|--------------------|-----------------------------|--------------------------|--------------------------------|------------------------------|
| <b><u>11.0</u></b> | <b><u>Annual review</u></b> | <b><u>25/03/2025</u></b> | <b><u>Ongo Homes Board</u></b> | <b><u>March 2026</u></b>     |
| 10.0               | Annual review               | 26/03/2024               | Ongo Homes Board               | March 2025                   |
| 9.0                | Annual review               | 28/03/2023               | Group Common Board             | March 2024                   |
| 8.0                | Annual Review               | 29/03/2022               | Group Common Board             | March 2023                   |
| 7.0                | Annual Review               | 25/03/2021               | Group Common Board             | March 2022                   |
| 6.0                | Annual review               | 26/03/2020               | Group Common Board             | March 2021                   |
| 5.0                | Compliance check            | 21/05/2019               | Heads of Service               | May 2020                     |
| 4.0                | Compliance check            | 07/06/2018               | Heads of Service               | June 2019                    |
| 3.0                | Health check                | 11/11/2015               | Heads of Service               | June 2016                    |
| 2.0                | Health check                | 26/03/2014               | Heads of Service               | March 2015                   |
| 1.0                | New policy                  | 21/06/06                 | Unknown                        | June 2008                    |





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## **1. Our policy is....**

- 1.1. To comply with all relevant health and safety legislation, standards and requirements to enable us to provide a safe and healthy working environment for our colleagues and all others who may be affected by our activities.
- 1.2. Our policy outlines our commitment to continual improvement and the implementation of our Health and Safety Management System.

## **2. It applies to...**

- 2.1 This policy applies to all areas of the Ongo group, including our Commercial companies; Ongo Roofing (trading as Ashbridge Roofing Solutions), Ongo Heating & Plumbing (trading as Hales and Coultas) and Trent Valley Electrical Services Ltd.

## **3. Because we...**

- 3.1 Recognise and accept our responsibility as an employer to comply with all relevant health and safety legislation and guidance. This enables us to provide a safe and healthy working environment, to prevent injury and ill health to our colleagues, and to ensure others are not harmed by our activities.
- 3.2 As a social landlord Ongo Homes recognises our responsibilities, to ensure our homes meet specific legal requirements to keep our tenants safe.

## **4. General Statement of Intent**

- 4.1 Our Boards, Leadership Team and all colleagues recognise their duty under the Health & Safety at Work Act 1974 to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees, contractors, customers, volunteers and others who could be affected by the operations of the organisation.
  - We will take all reasonable steps to meet our moral and legal responsibilities, ensure legal compliance and meet best practice, in all activities that we undertake.
  - We will identify significant risks in our operations ensuring we plan, resource and budget for their elimination, reduction or control.
  - We will maintain safe and healthy working conditions, provide and maintain premises, equipment and machinery, and ensure the safe storage, use and disposal of substances.
  - We will develop and follow an appropriate management system, programmes, plans and rules to ensure the health, safety and welfare of colleagues and others whilst carrying out duties on behalf of the organisation.
  - We will only select contractors who are professionally competent and who are compliant with relevant health and safety legislation and we shall ensure that their activities are periodically monitored.
  - We will ensure that all our colleagues and those working under our control will have sufficient information, instruction and training as is necessary to ensure they are competent and able to carry out their duties.
  - We will encourage the reporting of accidents, incidents and near misses, and through investigation ensure we learn from events to reduce the likelihood of reoccurrence.

- Health and Safety will be considered in all significant changes to the organisation or internal processes.
- We will look for opportunities to continually improve our management of health and safety through Audit and continuous review.
- We will follow our 15 core principles of Health and Safety, as referenced within our Health and Safety Policy

4.2 Our policy and its implementation will be regularly monitored, reviewed and updated at least annually to reflect any changes in legislation, or in light of any changes in our activities or procedures, and any updates will be brought to the attention of our colleagues.

Signed by:

S. C. Hepworth

S. Hepworth, Chief Executive Officer

Date: 25/03/2025

## **5. Roles and Responsibilities**

Health and Safety is the responsibility of everyone at Ongo. Our Boards and Executive Leadership Team will lead by example. The H&S reporting structure is as follows:

### **Ongo Boards**

Our Boards are accountable for the Health and Safety of Ongo, they must gain assurance that Health and Safety is effectively managed and complies with all relevant legislation.

In particular, they must:

- Ensure that health and safety is considered when making strategic business decisions
- Review and approve the Health and Safety Policy annually, ensuring there is sufficient level of resources to facilitate the full implementation of the policy
- Review and challenge Health and Safety at each Board meeting

### **Chief Executive and Executive Leadership Team**

Our Chief Executive is ultimately responsible for ensuring that we meet our statutory duties in respect of health, safety and welfare at work. Through the Leadership Team, the Chief Executive will:

- Ensure health and safety is prioritised when setting strategic direction and is integral in all business decisions;
- Lead on promoting a positive Health and Safety culture;
- Ensure there are appropriate and effective channels for two-way communication for Health and Safety matters;
- Lead on the continuous improvement of health and safety performance and ensure it is regularly reviewed;
- Ensure compliance with the Health and Safety Policy and that it is regularly monitored and reviewed;
- Ensure compliance with legislation, regulations, approved codes of practice and guidance relevant to health and safety;
- Ensure that specific responsibility is given to the:
  - Director of Corporate and Compliance, to oversee and ensure that resources are in place to manage the Health and Safety Policy;
  - The Director of Properties, to oversee and ensure that resources are in place to manage compliance with our landlord responsibilities.

### **Heads of Service**

In addition to the responsibilities below, Heads of Service will also:

- Provide health and safety leadership for their service areas and ensure that all concerns are addressed;
- Prioritise health and safety, ensuring that service areas have adequate resources to carry out their responsibilities;
- Monitor compliance with the Health and Safety Policy within their service areas;
- Ensure that all health and safety improvement actions are completed within timescales (these include Internal Audit, incident and engagement actions).

### **Managers and Team Leaders**

In addition to the employee responsibilities below, managers will also:

- Ensure that risk assessments are in place for work activities, that they are reviewed and communicated with relevant staff;
- Ensure that colleagues have appropriate resources and equipment to carry out their activities;
- Ensure the condition of work places and equipment is monitored, and inspected to ensure they meet requirements;
- Carry out incident investigations and implement any required actions, sharing learning with their teams;
- Ensure that colleagues undertake required health and safety training and identify additional training requirements as required;
- Consult with colleagues and discuss health and safety in team meetings and in 1:1s;
- Ensure compliance with the Health and Safety Policy and legislative requirements through inspections, review and supervision.

### **Employee (including volunteers)**

All employees have a responsibility to co-operate in the implementation of this policy. In particular, they must:

- Take reasonable care of their own health and safety and the health and safety of anyone who may be affected by their acts and omissions;
- Attend and co-operate fully with all training provided;
- Ensure they are aware of and understand all relevant risk assessments for the work they carry out;
- Carry out pre checks and inspections before using equipment, processes and work places;
- Inform their manager of any unsafe condition or perceived shortcoming in health and safety measures;
- Co-operate fully with managers in all matters relating to health and safety, following any instructions or safe working procedures;
- Use all vehicles, equipment, and materials in a safe manner to avoid personal injury and injuries to others and prevent damage to equipment, etc.;
- Report all accidents, incidents or near misses immediately;
- Not intentionally damage or interfere with anything relating to health, safety and welfare;
- Make full and proper use of any Personal Protective Equipment (PPE) provided;
- Work in accordance with this policy and all other health and safety policies, procedures, health and safety instructions and relevant legislation.

### **Health and Safety Team**

The Head of Risk & Compliance and the Health and Safety Team are responsible for providing Ongo with competent advice and support in compliance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999. Where necessary they will access external support and advice. In particular, the Health and Safety Team will:

- Provide consultation, advice and guidance on safety matters to staff at all levels within the organisation;

- Maintain the Health and Safety Management System and ensure it is up to date and fit for purpose;
- Assist the organisation in developing and reviewing health and safety standards and procedures;
- Maintain up to date, relevant and specialist knowledge of current and forthcoming statutory requirements, official authoritative guidance and safety technology;
- Disseminate information on safety, including changes in legislation, official guidance, and current best practice;
- Provide guidance and assistance in the preparation of risk assessments;
- Identify and, where appropriate, deliver Health and Safety training;
- Liaise with the Procurement Team to offer advice to staff when purchasing products and services in order to ensure that the most suitable transport, plant and equipment is chosen in relation to safety;
- Support the Health and Safety Forum and Employee Safety Representatives;
- Conduct safety assessments of any external contractors who wish to tender for work and advise managers of the findings;
- Take immediate action to prohibit operations or require improvements in them when this is deemed necessary and appropriate to the circumstances;
- Be the main contact for enforcing authorities and responsible for RIDDOR reporting and investigation.

### **Health and Safety Champions & members of the Health and Safety Forums**

The role of Health and Safety Champions and the Health and Safety Forum Members is a voluntary role usually performed by Operational Team members and Area Managers upon request of the Health and Safety Team. The purpose of these roles are:

- To provide a local point of contact for the Health and Safety team when implementing Health and Safety arrangements, initiatives and control measures
- To assist the Health and Safety team with the local rollout of various Health and Safety arrangements, initiatives and control measures
- Where appropriate maintain records of tools, equipment and personnel in relation to Health and Safety arrangements and training
- To monitor and maintain local arrangements and report any issues to the Health and Safety team
- When required attend Health and Safety Champion meetings hosted by the Health and Safety team
- To Champion Health and Safety best practise within their respective teams
- In particular, members of the H&S Forums are expected to raise issues from their service areas and participate in two way consultation regarding H&S.

When required specific roles and responsibilities are given to employee and tenant safety representatives, first aiders and fire marshals. These duties can be found in the specific procedures.

We will ensure that roles and responsibilities are communicated to all staff, specifically with:

**New Roles**

- At induction
- Taking on a new role including job transfers
- Reviews or changes to job functions, job descriptions, and job reviews

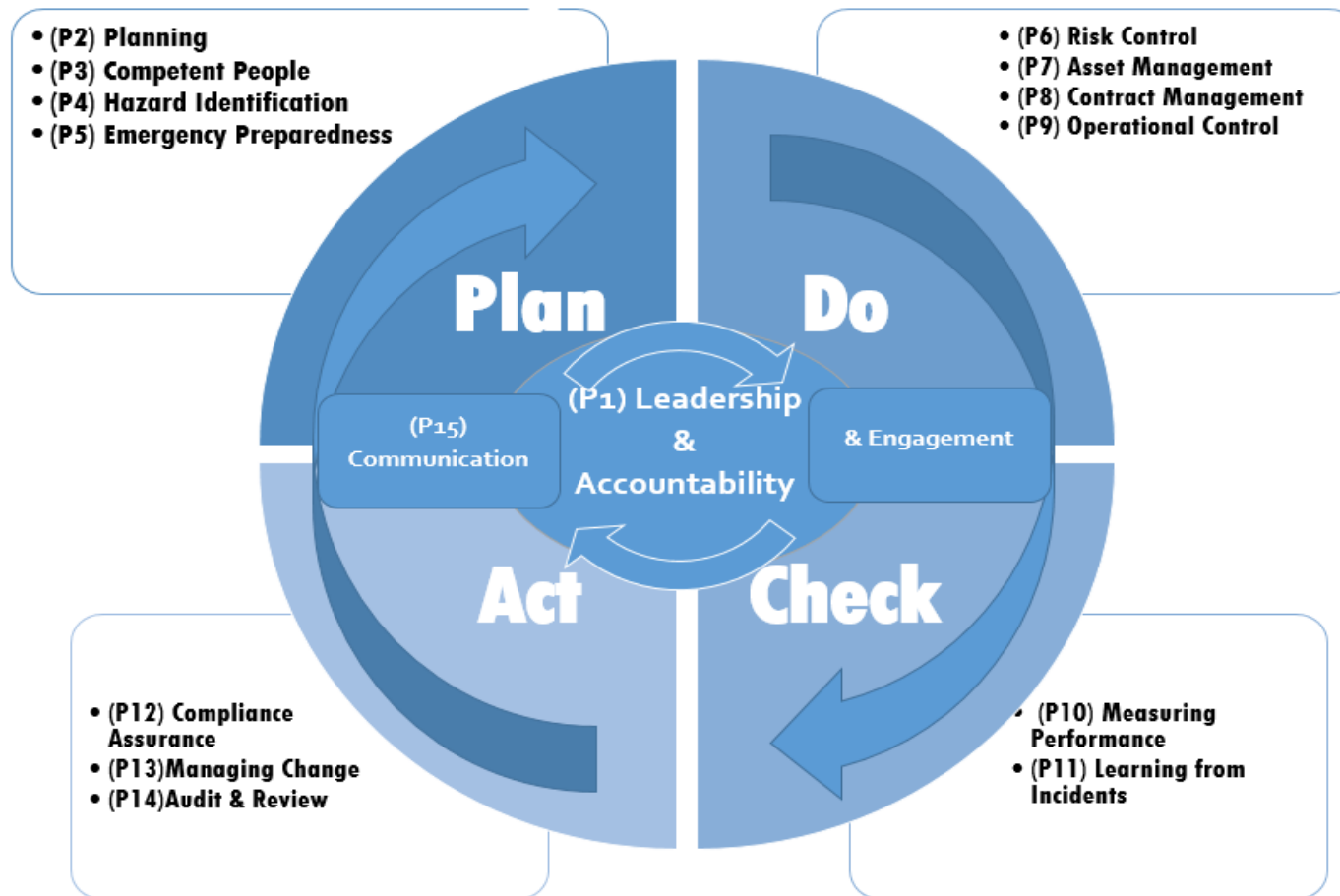
**Existing Roles**

- On review of the Health and Safety Policy
- Personal Development Reviews
- Management meetings
- Following risk assessments and incident investigations

Any shortfall in an individual's ability to deliver their role and responsibilities is appropriately addressed with the staff member or raised to their line manager.

## 6. Our 15 Core Principles

Our Health and Safety Policy is underpinned by 15 core principles that set out our arrangements for managing Health and Safety. Each Core Principle aligns to the Plan, Do, Check, Act approach (HSG65) and is supported by sub policies and procedures that give practical guidance and instruction in achieving the Core Principle objectives. Additional supporting documentation is held within the Health and Safety Management System.



| No. | Core Principle                                                                                                                                                                                            | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P1  | <p><b>Leadership and Accountability:</b></p> <p>We believe that effective leadership drives the culture, sets the direction and ensures an embedded commitment to Health and Safety</p>                   | <ul style="list-style-type: none"> <li>• Leaders and managers lead by example, demonstrate openness, transparency and honesty</li> <li>• Directors and Leaders receive suitable and appropriate training in Health and Safety Leadership</li> <li>• Directors will chair relevant risk based Health and Safety Forums</li> <li>• Ensure that an effective health and safety management system is developed, documented, implemented, monitored and reviewed</li> <li>• Provide a supportive organisational structure, sufficient resources and specialist expertise to ensure effective operations and legal compliance</li> <li>• Ensure health and safety objectives and goals are set, measured and findings communicated</li> <li>• Engage in positive proactive two-way conversation on matters of health and safety with colleagues, contractors, and any other persons affected by our activities</li> <li>• Encourage accountability and learning to ensure continuous improvement</li> </ul> |
| P2  | <p><b>Planning:</b></p> <p>Effective planning ensures we are successful in meeting our objectives, fulfil our legal obligations and ensure that we look after everyone's health, safety and wellbeing</p> | <ul style="list-style-type: none"> <li>• Health and Safety is considered as part of any planning process</li> <li>• The Ongo Health and Safety Management system aligns with the objectives of the Ongo Strategies</li> <li>• Realistic Health and Safety objectives are identified, set, monitored and reviewed based on the results of measuring performance.</li> <li>• Sufficient resource, and responsibility is assigned to the implementation and sustainability of the Health and Safety Management System</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| P3  | <p><b>Competent People:</b></p>                                                                                                                                                                           | <ul style="list-style-type: none"> <li>• Systems are in place to identify Health and Safety training requirements within each role and job profile</li> <li>• The training needs of all colleagues are regularly discussed and reviewed by their line manager</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| No. | Core Principle                                                                                                                                                                                                                                                                                    | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | <p>It is essential that our colleagues and contractors have the right skills, knowledge, experience and training to carry out work activities safely. Effective training will develop positive behaviours to ensure our tasks, operations and procedures are delivered without harm or injury</p> | <ul style="list-style-type: none"> <li>• We provide suitable and relevant training and access to qualifications to ensure the safe delivery of organisational activities</li> <li>• All training will be documented and evidenced to monitor successful completion and refresher training needs</li> <li>• New or transferring colleagues and contractors will receive a suitable induction. The induction will contain relevant Health and Safety information and training on Emergency Procedures</li> <li>• Training requirements will be regularly reviewed to ensure their relevance and effectiveness</li> <li>• Any third parties carrying out work on our behalf, will be sufficiently competent to carry out the activity</li> <li>• Health and Safety professionals are in place to support the organisation in achieving and maintaining its Health and Safety goals and objectives</li> </ul> |
| P4  | <p><b>Hazard Identification:</b></p> <p>Hazard identification is the starting point for effective risk management, it's the ability to recognise situations and conditions that have the potential to cause harm to individuals, asset and property loss or damage to the environment.</p>        | <ul style="list-style-type: none"> <li>• Hazard awareness is embedded within mandatory Health and Safety training for all Ongo colleagues, including point of work hazard identification.</li> <li>• Enhanced Health and Safety training will be given to those whose role potentially exposes them to significant Hazards.</li> <li>• Regular Engagement visits by the Ongo Health and Safety team will highlight the importance of Hazard Identification</li> <li>• A reporting procedure is provided to highlight Hazards that are not sufficiently controlled by existing procedures</li> <li>• All significant hazards will be shared with those at risk, and included on appropriate risk assessments</li> </ul>                                                                                                                                                                                    |

| No. | Core Principle                                                                                                                                                                                                     | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P5  | <p><b>Emergency Preparedness:</b></p> <p>Although we prioritise prevention, we must be prepared in case things go wrong. We must be prepared to respond, manage and recover as efficiently as possible.</p>        | <ul style="list-style-type: none"> <li>• Our Business Continuity Plan and Procedures link directly with Health and Safety Requirements. The Head of Risk &amp; Compliance (or delegated H&amp;S Manager) will be included in all meetings</li> <li>• Relevant stakeholders are identified and are involved in the creation of emergency plans</li> <li>• Appropriate training is in place for specific roles and responsibilities to enable Ongo to respond to an emergency situation</li> <li>• Adequate communication plans are in place to liaise with external parties and the media. Colleagues with communication responsibilities have appropriate training</li> <li>• Emergency plans are in place, assessed and reviewed for continued effectiveness. Where improvement opportunities have been identified, this will be communicated to all relevant stakeholders</li> <li>• First Aid requirements are assessed and reviewed to ensure they meet the requirements of the business. Named people are appointed and appropriately trained to carry out First Aid</li> <li>• Competent First Aiders and Fire Wardens are in place, and understand their specific responsibilities</li> </ul> |
| P6  | <p><b>Risk Control:</b></p> <p>Effective risk control is achieved by fully understanding the level of risk and ensuring the most appropriate control measures are selected and communicated to reduce the risk</p> | <ul style="list-style-type: none"> <li>• Risk assessments are carried out for all significant risks and reviewed following a change, incident or specified frequency</li> <li>• Hazards are identified to determine the likelihood and consequence of the risk. To develop an understanding of the nature of the risk and its potential to cause harm or injury</li> <li>• Risks are evaluated by determining the risk rating, the combination of likelihood and consequence to make a decision on acceptable risk</li> <li>• A defined, documented, approved risk process will be in place. Risk assessments will be undertaken by competent people, with the involvement of the workforce and its representatives. For high hazard activities or risk assessments that need to be in place to meet legal requirements, a specialist will be appointed</li> </ul>                                                                                                                                                                                                                                                                                                                                   |

| No. | Core Principle                                                                                                                                                                                                                              | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>Monitoring and reviewing the risk will be done at the appropriate levels by competent staff</li> <li>Clearly defined communication lines exist to ensure all relevant people who may be affected by the risk receive appropriate training and instruction resulting from the risk assessment</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P7  | <p><b>Asset Management:</b></p> <p>We will have a systematic approach to the management and maintenance of properties and equipment</p> <p>As a landlord we understand our legal responsibilities to ensure our tenants' homes are safe</p> | <ul style="list-style-type: none"> <li>Fully understand our legal requirements as a landlord and have plans in place to manage compliance obligations</li> <li>Systems are in place to monitor and manage compliance and that any corrective actions are dealt with within agreed timescales</li> <li>Data quality and integrity on our assets are maintained and reconciled to ensure we have a full understanding of risk and future investment needs</li> <li>Our Inspection &amp; Testing Policy is in place and monitored. Ownership, roles and responsibility of assets is clear and understood by competent individuals</li> <li>The maintenance and repair of our assets are led by legal compliance, industry best practise and manufacturer and supplier recommendations</li> <li>The existence of an Asset Register for specified equipment</li> <li>Systems exist to ensure the effective planning, scheduling and execution of asset maintenance work</li> <li>Where appropriate Safe Systems of Work exist to ensure safe working conditions are established and maintained for all personnel working on our Assets. The Safe Systems of Work shall be implemented and monitored by trained and competent personnel</li> <li>The competencies of the people working on our assets are identified, documented and monitored</li> </ul> |

| No. | Core Principle                                                                                                                                                                                                                                                                                                 | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|     |                                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>• Modifications, changes or disposal to our Assets must be authorised by the asset owner and may be subject to the risk assessment process detailed in Core Principle 8 (Management of Change)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P8  | <p><b>Contract Management:</b></p> <p>Those providing a service for Ongo, must have the relevant Health and Safety competence</p> <p>An effective system must be in place to ensure Ongo health and safety principles are reflected, implemented and maintained across our contractors and sub-contractors</p> | <ul style="list-style-type: none"> <li>• Health and safety requirements are embedded in the pre-qualification, selection and tendering process</li> <li>• Contract companies are able to demonstrate an effective health and safety management system that aligns to the standards set by Ongo</li> <li>• Provision of information to all Contractors on known hazards and risks at the pre-construction (tendering) stage</li> <li>• Contract companies provide suitable and sufficient risk assessments, adequate supervision and a competent workforce</li> <li>• Where appropriate Ongo shall request the contract company to provide periodic auditing and inspection of the health and safety arrangements of their work for Ongo</li> <li>• All contract companies report all accidents and incidents to Ongo and provide copies of incident investigations and related learning</li> <li>• Ongo shall regularly monitor the health and safety arrangements of Contractors and periodically carry out inspections</li> </ul> |
| P9  | <p><b>Operational Control:</b></p> <p>Effective operational control provides the standards, procedures and information to ensure the safe</p>                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• Health and Safety Arrangements (HSA'S ) documents are produced to provide information and guidance on the safe implementation of work activities, processes and use of equipment</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| No. | Core Principle                                                                                                                                                                                                                                                                                     | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | delivery of our processes, activities and equipment                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>• HSA documents are produced with the cooperation and involvement of subject matter experts from within the organisation. Where necessary external guidance will be sought to ensure legal compliance and best practise is established</li> <li>• Safe systems of work (SSOW) are implemented to support the safe delivery of high risk tasks. High risk tasks requiring a SSOW will be identified through the risk profiling process and documented on the risk profile document</li> <li>• A network of Health and Safety Champions are implemented and supported within relevant teams to assist in embedding and monitoring Health and Safety arrangements</li> <li>• Safe Systems of Work contain suitable and sufficient Isolation and Immobilisation arrangements</li> <li>• Roles and responsibilities and competency requirements for the implementation and ownership of SSOW will be documented and communicated</li> </ul> |
| P10 | <p><b>Measuring Performance:</b></p> <p>Performance is measured to improve and maintain the effectiveness of the health and safety management system. This requires a combination of active and reactive measures. Effective measuring provides the ability to take corrective actions rapidly</p> | <ul style="list-style-type: none"> <li>• The effectiveness of the health and safety management system is measured against our Health and Safety Objectives</li> <li>• A suite of key performance indicators is in place to measure performance against key health and safety objectives, records are kept and performance is reviewed at the appropriate level</li> <li>• Performance measurement and management findings are reviewed, evaluated, and documented to accomplish future improvement of strengths and weaknesses of the health and safety management system</li> <li>• Strengths and opportunities are identified to inform future resource and training requirements</li> </ul>                                                                                                                                                                                                                                                                                |

| No. | Core Principle                                                                                                                                                                                                            | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| P11 | <p><b>Learning from Incidents:</b></p> <p>Learning from incidents prevents future accidents. We encourage incident reporting to build hazard awareness and prevent future more serious incidents from occurring</p>       | <ul style="list-style-type: none"> <li>• Systems are in place to ensure all events / incidents are documented and a process is in place to investigate them at the appropriate level</li> <li>• Systems are in place to ensure that investigation levels are proportional to the potential consequences of the event / incident</li> <li>• Our reporting and triaging system considers the potential for civil liability and shares information with relevant stakeholders, such as our Insurers</li> <li>• Systems are in place to identify, analyse and document root causes</li> <li>• Trends are identified to develop prevention programmes that are communicated to appropriate people</li> <li>• Colleagues are trained to carry out appropriate investigations to their level and participate in event / incident investigations</li> <li>• Incidents and resulting 'Shared Lessons' are effectively communicated to the relevant teams in a timely manner</li> <li>• Our 'Shared Lessons' where appropriate are communicated to our contractors and other stakeholders to encourage best practice across all our activities</li> </ul> |
| P12 | <p><b>Compliance Assurance:</b></p> <p>We strive to achieve high standards in health and safety. To achieve the highest standard, we must comply with laws, regulations and approved codes of practice. These must be</p> | <ul style="list-style-type: none"> <li>• A legal compliance register is maintained and reviewed. The register will demonstrate which regulations are relevant to our activities so an assessment is made. This will be reported annually to Group Audit and Risk Committee as part of the management review</li> <li>• Identify, assess and interpret how regulatory changes will impact on the business. Information on updates and changes on Health and safety legislation are communicated to the appropriate people</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| No. | Core Principle                                                                                                                                                                               | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|     | identified and assurance provided so that planning can be made for continuous improvement                                                                                                    | <ul style="list-style-type: none"> <li>• Monitor legal compliance and identify and implement required changes</li> <li>• Colleagues with compliance responsibilities have received the appropriate training and roles and responsibilities are clearly defined</li> <li>• Seek third line assurance, to provide an independent and objective opinion on our compliance obligations</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P13 | <b>Managing Change:</b><br><br>Change must be effectively managed and communicated in order to identify potential risks to the organisation, in particular with regards to health and safety | <ul style="list-style-type: none"> <li>• Health and Safety is considered in all significant business decisions</li> <li>• Where identified, significant proposed changes are subject to risk assessment where significant changes could affect any part of our activities, workplace, infrastructure, people, and the organisation</li> <li>• That the risk assessment must consider the whole 'life cycle' of the proposed change and where necessary any significant findings must be recorded</li> <li>• Processes are in place to avoid the possibility of introducing intolerable or significant unmanaged risks to the organisation</li> <li>• That appropriate staff and other stakeholders are consulted prior to the implementation of the change and communicated with effectively during and after</li> <li>• Any significant changes which may affect the suitability of any existing risk assessments or controls prompt a review of that risk assessment</li> <li>• That appropriate controls are determined and introduced in a timely fashion which take account of the findings of the risk assessment</li> </ul> |
| P14 | <b>Audit and Review:</b>                                                                                                                                                                     | <ul style="list-style-type: none"> <li>• Processes are in place to assess the effectiveness and suitability of the management system and objectives</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| No. | Core Principle                                                                                                                                                                         | We shall ensure:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | <p>Audit provides a structured approach to monitoring the efficiency, effectiveness and reliability of the health and safety management system and supports continuous improvement</p> | <ul style="list-style-type: none"> <li>• A documented risk based audit programme exists to evaluate progress and drive continuous improvement</li> <li>• Audits are carried out by trained and competent persons for both internal and external audits</li> <li>• A system is in place to engage and involve colleagues in the audit process to contribute to continuous improvement of the management system and working practice</li> <li>• Agreed actions from Internal Audits are completed within timescales and the effectiveness is monitored</li> <li>• Audit outcomes and corrective action progress will be reported to the Leadership Team and the Health and Safety Forum</li> </ul>                                                                                                                                                                                                           |
| P15 | <p><b>Communication and Engagement:</b></p> <p>To achieve success in health and safety management, there needs to be effective communication throughout the organisation</p>           | <ul style="list-style-type: none"> <li>• Effective two-way communication takes place throughout the organisation. Both formal and informal arrangements are in place</li> <li>• Employee safety representatives are in place that will champion health and safety for colleagues. They will raise staff concerns and update relevant teams on H&amp;S matters</li> <li>• A programme of risk-based Health and Safety Forums are in place to support consultation with staff on Health and Safety matters</li> <li>• The Health and Safety Team will manage an Engagement Programme with teams, to provide support and advice where required. Engagement visits will be both proactive and reactive and may identify opportunities for improvement</li> <li>• Team meetings will always include Health and Safety as an agenda item and staff encouraged to raise any Health and Safety concerns</li> </ul> |

| No. | Core Principle | We shall ensure:                                                                                                                                                                                                                                                                                                                           |
|-----|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                | <ul style="list-style-type: none"> <li>• Measures are in place to utilise Health and Safety communications to highlight exceptional performance and promote positive recognition</li> <li>• Health and Safety Information will be effectively communicated to all colleagues, contractors and others affected by our activities</li> </ul> |

## **7. Making sure we do what we say...**

- 7.1. Our policy and its implementation will be regularly monitored, reviewed and updated.
- 7.2. The policy will be monitored in accordance with Core Principle 13: Measuring Performance.
- 7.3. The effectiveness of the Health and Safety Policy will be subject to Internal Audit and reported annually as part of the wider assurance report to Board. Core Principle 14: Audit and Review.

## **8. Other things to bear in mind**

- 8.1. The Health and Safety Policy is the overarching document within our Health and Safety Management System.
- 8.2. All relevant health and safety legislation will be identified and the evaluation of compliance with its requirements established by Ongo. In particular, this policy relates directly to section 2(3) of the Health and Safety at Work Act 1974 and the management of Health and Safety will comply with and follow the requirements of;
  - Health & Safety at Work etc. Act 1974, and subordinate regulations
  - Management of Health & Safety at Work Regulations 1999

## **9. We'll look at this again...**

- 9.1. At least annually to reflect any changes in legislation or in light of any changes in our activities or procedures and any updates will be brought to the attention of our colleagues.