

Millat Asian Housing  
Association  
'Community Based  
Community Led'

# **MILLAT ASIAN HOUSING ASSOCIATION**

## **HEALTH & SAFETY POLICY**

### **PURPOSE:**

This document sets out guidance and procedures for implementing Millat's Health & Safety Policy

**Approved by the Board in February 2025**

**To be reviewed in 2028**

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**April 2017**

## **2. Foreword**

This manual contains; procedures, guidance, policies, rules and statements covering the day to day management of health and safety at Millat.

This Health and Safety Manual should be read in conjunction with the Health and Safety Policy Statement.

## **3. Statement of Intent**

It is the intention of Millat to ensure, as far as it reasonably can, the health, safety and welfare at work of all our employees. Millat undertakes to comply, as a minimum, with the provisions of the Health and Safety at Work Act 1974 (referred to as HASAW in this policy statement), and all other Acts, Regulations, and Codes of Practice, including the 1992 Regulations which arose from European Directives and fall under the umbrella of that legislation. Disabled employees (as defined by the Disability Discrimination Act 1995) will be given additional support.

Millat seeks to comply with the Health and Safety (Consultation with employees) Regulations 1996. These are designed to ensure consultation with employees, in good time, on matters relating to their health and safety at work.

## **4. General Approach to Hazards**

Dealing with health and safety hazards is a variable and sometimes complex problem, because there will be different problems and solutions in each case. Millat will however approach each issue by a common method, and in the order set out below:

- (a) Identify the hazard and assess the degree of risk which it contains.
- (b) Where the risk is at an unacceptable level to investigate whether the hazard can be totally removed, e.g., by replacing it (for example with a safe alternative procedure, process, machine or substance).
- (c) If total elimination is not possible, investigate means of minimising the problem, e.g., by control and reduction measures which at least satisfy the standards which are laid down in health and safety legislation. Bring to the attention of the Housing Manager, in writing, the hazards or potential hazards which require decisions or expenditure outside of their authority.

- (d) If the hazard itself cannot be sufficiently reduced, investigate the provision of protective equipment, clothing or procedures for staff to be personally protected, so as to meet at least minimum legislative requirements.

Written records will be maintained by the 'Designated Person' of all assessments made and remedial actions taken under the above four steps.

In addition, in the unlikely event of any employees being identified as being at high health and safety risk for any reason, surveillance of the circumstances (and their health if appropriate) will be maintained, and records kept for health and safety purposes.

Millat employees will not be required to work in conditions which present an unacceptable level of risk or put them in imminent serious danger to their health and/or safety. Housing Manager and the Chair are empowered to authorise cessation of work, evacuation or change of workplace in the extreme event of any circumstances of this kind arising. Staffs are not to go home unless authorised to do so by Housing Manager or the Chair

## 5 Documents and notices required to be kept by law

- Health and Safety Policy Statement\*\*\*
- Fire and emergency procedures and instructions\*
- Health and safety law – what you should know poster\*
- Employers' liability insurance certificate\*
- First aiders and locations of first aid kits\*
- Fire certificate, where required\*\*
- Accident book \*\*
- Significant findings of risk assessments, including COSHH\*\*
- Records of statutory inspections for lifts and pressure plant\*\*

Key    \*        These are to be kept on display for the attention of employees  
      \*\*        These are to be kept on site and held by responsible manager  
      \*\*\*      A copy of these will be given to each employee

## 6 Safety representatives and committees

### Health and Safety Panel

This Panel will consist of the **Secretary, Housing Manager** and the **Safety 'Designated' Officer** for health and safety. The Panel will

- Identifying all areas of health and safety which have policy implications, including health and safety legislation, with regard to employees, residents, visitors, and contractors while in our offices or on our schemes.
- Evaluating implication of these issues and their prioritisation with regard to resources and implementation.
- Monitoring the Health and Safety provision to Staff.

The Health and Safety Panel meetings will be held four times a year or more frequently if required.

Millat will comply with the requirements of the Health and Safety Consultation Regulation 1996.

### **Safety 'Designated' Person/Officer**

This person will be appointed from amongst the staff (not Housing Manager). Millat will provide them where necessary with sufficient facilities and enable training to carry out this task.

The role of the Safety 'Designated' Person/Housing Officer is to;

- Communicate policy on all health and safety matters within their work areas.
- Encourage all staff to be involved in matters of health and safety.
- Attend Health and safety Panel meetings.
- Carry out periodic inspections to identify unsafe equipment, working conditions, practices and fire hazards, making reports of findings and recommendations regarding remedying of any defects.
- Assist with risk assessments.
- Assist with accident investigation.
- Consult with Housing Manager on all issues of health and safety.

## **7. Accident Reporting**

All accidents that happen in the execution of your duties during your work, no matter how small or whether or not personal injury is caused, must be reported to the Housing Manager or the Chair, indicating what happened, where and when, and (if known) how it happened. In addition, accidents occurring in common parts (e.g. Courtyards, staircases, common room, offices) involving visitors, tenants etc to our estates must also be recorded in the accident book which is kept by the Housing Manager.

Accidents must be recorded and reported for the following reasons:

- (a) It is a legal requirement - and failure to report accidents may result in prosecution of the persons concerned.
- (b) Knowledge of the circumstances of an accident may be used to prevent further accidents.
- (c) Information obtained about the accident may be required at a later date to assess in the settlement of industrial injury claim.

Accident statistics provide information regarding the safety performance of the Organisation. These statistics can be used to identify training needs.

### **Completion of accident reports**

To report an 'accident reporting form' must be completed and given to the Housing Manager or the Chair. The Housing Manager or The Chair will then record the information in the accident book.

Where accidents result in serious injuries or in absence of staff from work for more than three days, or hospital treatment Millat is obliged to report them to the Health and Safety Executive on a standard form (F2508) or online, under the provisions of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1985. In addition, any accident involving injury, whether resulting in absence from work or not, must be reported in writing by the Housing Manager to the 'Designated person' who will maintain records.

The entry and report may be made by any member of staff other than the injured person. It is important to ensure that all witnesses of the event agree with the account of how, where and when it happened and that it is entered in the Accident Book.

Near misses and hazards should also be recorded in the Accident Book. This will enable remedial actions to be recommended to avoid future accidents.

Also see section 17 below 'Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1985'.

### **Conclusions of Assessment (first aid provision)**

#### **First Aid Boxes**

A standard statutory first aid kit (1-6 persons) will be located and maintained at the office and display sign fixed to note its location. The Housing Manager is responsible for maintaining the stock of the box.

#### **First Aiders**

One or two members of staff shall be trained first aiders. The name of the first aiders will be displayed in the office

#### **Other provisions**

No other provisions are concerned necessary.

## **8. Accident Prevention**

How you can help to prevent accidents:

- (a) Always maintain good standards of housekeeping. Keep floors clean and clear of obstructions. Never let electric cables cause trip hazards. Always dispose of rubbish.
- (b) Never stack materials in an unsafe manner & be sure that they will not collapse; keep all cabinet tops clear.
- (c) Maintain clear access to doors, on stairways and fire exits. Never allow items to restrict or block access to fire escape routes. Ensure fire exit doors are completely clear from obstruction.
- (d) Maintain clear access to fire extinguishers and fire alarm call points. Do not permit displays to block access to these items.
- (e) Obey safety instructions and training at all times especially with regard to use of equipment.

Report to your Housing Manager anything which you believe to be unsafe.

## **9. Annual Safety Inspections on Estates**

Millat has an obligation to see that its premises (including external areas) are safe as defined in the following legislation: -

### **Defective Premises Act 1972**

#### **Section 4**

Places a duty on the landlord, in relation to all persons who might reasonably be expected to be affected by the defects on the state of the premises, to take such care as is reasonably safe from personal injury or from damage to their property caused by a relevant defect. This duty applies if the landlord knows or if he ought in all circumstances to have known of the relevant defects.

### **Inspection, Monitoring and Maintenance**

We fail in our legal duty if we do not:

- Take reasonable steps to detect hazards
- Protect tenants and users from those hazards
- Act to remove the hazard

Annual inspections will be undertaken by the Housing Officer or the Housing Manager. However, this annual inspection does not prevent additional inspections being undertaken or hazards being dealt with during normal day to day management of Millat's office and schemes.

### **Detecting and dealing with Hazards**

As trained members of staff you will be aware of good Health and Safety practice and what may constitute a hazard. You will already be in the practice of taking action to protect tenants and users, informing your Housing Manager, and arranging / ensuring that the estates are free from unprotected hazards.

The Annual safety inspection is a formal procedure for recording that the estates are free from unprotected hazards at the time of inspection and if not, the action taken.

### **What risks are there?**

A check list of possible risks is outlined below and will assist in the completion of the inspection forms (Types of hazards).

### **The Inspection**

The period and timing of the Annual Inspections will be agreed with the Housing Manager but must be completed and returned to the Chair by the 30th of November each year. It is important to note and protect tenants and users from detected hazards.

It is important to complete all sections of the inspections including stating when elements do not apply.

An example of the form is outlined below and is located on our computer system.

### **Training**

Any training necessary will be agreed with the Housing Manager.

### **Types of hazards**

#### **Fall of a person on same level**

- Fall on same level
- Fall on stairs, steps etc, lifting or uneven surfaces
- Tripping, equipment/object causing an obstruction

#### **Fall of a person from height**

- Unauthorised access onto scaffolding
- Inadequate guards to stairs
- Falling into excavations, gullies, inspection chambers

#### **Falling Objects/materials**

- Falling materials/plant from scaffolding/roof
- Overhead activities
- Maintenance activities
- Poorly stacked items

#### **Fixed plant/equipment**

- Laundry equipment
- Lifts, hoists



**Mobile plant/equipment or materials**

Trailing leads, hoses  
 Positions and size of equipment  
 Poorly stacked materials  
 Inadequate signs, guards  
 Unattended equipment/plant/hand tools

**Electrical**

Possible unauthorised access to fuse boxes, intake cupboards  
 Poorly maintained leads, equipment

**General**

Storage and use of cleaning materials, COSHH requirements  
 Fire Risk from the building up of rubbish / furniture  
 Health risk from the build up rubbish  
 Animals fouling grass/play area, other surfaces  
 Broken glass  
 Location and use of skips

**Annual Inspection Form**

<b>Scheme:</b> <b>Date:</b> <b>Surveyed by:</b> <b>Location:</b> e.g., Footpaths,    stairs, ramps,    corridors,    car parks				
<b>Hazard</b>	<b>Risk Assessment</b> High (H) Medium (M) Low (L)	<b>Control Measures</b>	<b>Orders Issues</b>	<b>Review date</b>

**10. Control of asbestos at work regulation and the asbestos licensing regulation****Background**

Asbestos was widely used in buildings in the past and much of it is still in place. There are three main types of asbestos; Chrysotile, Amosite and Crocidolite, they are usually called white, brown and blue asbestos respectively. However, they cannot be identified just by their colour.

Blue and Brown asbestos have not been imported into the UK for nearly 11 years and are now banned by law.

## Risks from Asbestos

Asbestos-related diseases are currently responsible for about 3000 deaths a year in Britain. There is usually a long delay between first exposure and the first symptoms of the disease. This can vary between 15 and 60 years. A quarter of the people now dying from asbestos-related diseases worked in the building trade. They were carpenters, joiners, electricians, shop fitters, plumbers etc. They may have breathed in asbestos dust during day-to-day work with asbestos materials or because work with asbestos was carried out near them.

Many buildings still contain asbestos so those that undertake maintenance work may still be at risk.

Asbestos will only pose a risk to health if asbestos fibres are released into the air, breathing in these fibres can cause fatal diseases.

Provided the asbestos material is intact and, in a position, where it cannot be easily damaged it will not pose a risk to health.

### Where can asbestos be found?

- Insulating board

Commonly used in 1960s and 1970s system buildings, asbestos content of 20-45%.

Can be found in materials such as:

Insulation boards in walls, on doors, ceiling, ducts, infill panels, ceiling tiles bath panels and partitions.

Unlikely to be found in building constructed after 1982.

- Lagging

Widely used in public building and system-built flats during the 1960s to early 1970s in areas such as:

Pipes, boilers and boiler houses.

The lagging was used to provide the thermal insulation and has an asbestos content of 55-100%.

Asbestos lagging is very rarely found in homes, especially those constructed after the mid 1970s. The use of asbestos for thermal insulation was banned in 1986.

- Sprayed coatings

Sprayed asbestos coatings were used for fire protection of steelwork and concrete and are commonly found in system-built flats built during the 1960s. The coats, which contain up to 85% asbestos, were commonly used around the core of the building in locations such as:

- Service ducts, lift shafts and steel/concrete framework.

Use stopped in 1974 and sprayed asbestos has been prohibited since 1986.

- Asbestos-cement products

Asbestos-cement is the most widely used asbestos material and the asbestos content is mainly between 10-15% but can be up to 40%. It is found in many types of building as profiled sheets for such uses as:

- roofing, wall-cladding, partition boards, linings to walls and ceilings, bath panels, soffit board, fire surrounds, fluepipes, cold water tanks, roofing tiles, drainpipes.

Its use has declined from 1976, but asbestos cement is still being used, particularly in roofing and cladding products.

- Other materials and products

Asbestos has been used in a variety of building materials such as:

- decorative coatings, textured paints and plasters, e.g., 'Artex', plaster floor tiles, cushion flooring, roofing felts, tapes, ropes, felts, blankets, oven gloves, ironing boards, seals on cookers and brake linings.

Asbestos was used in some warm air heating systems, electric storage heaters up to 1976 and in flameless catalytic gas heaters up to 1988.

## Current Legislation/Statutory Instruments and Order

- Anti-pollution Works Regulations 1999 SI No 1006
- Asbestos (Licensing) (Amendment) Regulations 1998 SI No 3233
- Asbestos (Licensing) Regulations 1983 SI No 1649 & 1986 SI No 392
- Asbestos Products (Safety) Regulations 1985 SI No 2042
- Asbestos (Prohibitions) (Amendment) Regulations 1999 SI No 2373
- Asbestos (Prohibitions) (Amendment) (No. 2) Regulations 1999 SI No 2977

- Asbestos (Prohibitions) Regulations 1992 SI No 3067 & 1999 SI No 2977
- Construction (Design and Management) Regulations 1994 SI No 3140 & 1999 SI No 3242
- Control of Asbestos at Work Regulations 2002 SI No 2675
- Control of Asbestos in the Air Regulations 1990 SI No 556
- Control of Pollution (Supply and Use of Injurious Substances) Regulations 1986 SI No 902
- Control of Substances Hazardous to Health Regulations 2002 SI No 2677
- Environmental Protection (Controls on Injurious Substances) (No. 2) Regulations 1992 SI No 1583
- Environmental Protection (Controls on Injurious Substances) Regulations 1992 SI No 31
- Environmental Protection (Controls on Injurious Substances) (No. 2) Regulations 1993 SI No 1643
- Environmental Protection (Controls on Injurious Substances) Regulations 1993 SI No 1
- Health and Safety at Work, etc Act 1974 (Application to Environmentally Hazardous Substances) (Amendment) Regulations 1999 SI No 40
- Health and safety at Work, etc Act 1974 (Application to Environmentally Hazardous Substances) Regulations 1996 SI No 2075 & 1999 SI No 40
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 SI No 3163
- Special Waste (Amendment) Regulations 1996 SI No 2019
- Special Waste (Amendment) Regulations 1997 SI No 251
- Special Waste Regulations 1996 SI No 972 & 1997 SI No 251
- Trade Effluents (Prescribed Processes and Substances) Regulations 1992 SI No 339
- Waste Management Licensing (Amendment, etc) Regulations 1995 SI No 288

- Waste Management Licensing (Amendment No. 2) Regulations 1995 SI No 1950
- Waste Management Licensing (Amendment) Regulations 1996 SI No 1279
- Waste Management (Amendment) Regulations 1997 SI No 2203
- Waste Management Licensing (Amendment) Regulations 1998 SI No 606
- Waste Management Licensing Regulations 1994 SI No 1056 & 1998 SI No 606
- Waste Management (Miscellaneous Provisions) Regulations 1997 SI No 351
- Waste Management Regulations 1996 SI No 634

### Meeting the requirements

As Millat manages properties that are mainly new builds and new rehabs apart from the 'void' units it is very unlikely that any of Millat schemes will have any Asbestos related structures.

However, we must find out from the Main landlords particularly of any older units to confirm that there are no asbestos related structures in their property. In cases where there are Asbestos, we must obtain confirmation from the landlords and their details kept in a register as follows

- Analysis and air sampling records
- Removal records

Staff and contractors must be made aware of such information held by Millat.

The Chair must ensure that at least an annual review of the Asbestos Register is undertaken.

The information contained within the Register must be available to tenants on request.

### Training

All staff shall undertake regular training in the risks related to asbestos, 'The Control of Asbestos at Work Regulations' and the Approved Codes of Practice (ACOPs). Copies of these are maintained at the office. Existing and all new members of staff are to be provided with the pocket size guide 'Asbestos Alert.' Other information booklets produced

by 'Department of Environment Transport Regions' and Health and Safety Executive is available from the office.

Where possible information booklets will be made available to tenants.

- Assessment prior to working

Prior to the commencement of building works, maintenance and cleaning processes, an assessment of the building fabric must be undertaken. This is unless an assessment has already been undertaken and records are available.

If there has not been any assessment at all, insulation or insulation board fitted prior to 1986 should be treated as asbestos and assessment undertaken.

It is important to note that from the 1<sup>st</sup> of August 1999, work involving asbestos insulating board can only be carried out by an asbestos removal contractor, who will be required to notify the HSE giving the statutory 14 days notice.

Removal of even a single access panel, tile or painting of unencapsulated asbestos, along with stripping, decorating of artex/textured coatings will have to be notified to the HSE. Requests for the assessment of building fabrics are to be referred to the Housing Manager.

No work involving the creation of dust, removal of panels, painting of un-encapsulated panels, stripping/decorating of artex / textured coatings is to be undertaken by any member of Millat staff.

Work on asbestos materials will only be undertaken by licensed Asbestos Contractors.

The task of asbestos assessment is to be issued to Millat's approved Licensed Asbestos Removal/Testing Contractor. It may be necessary to close off the area until the assessment, repair, encapsulation or removal is complete. Tenants, staff and contractors are to be advised as to the possible risks. Millat's Register and Maintenance Manuals are to be kept up to date.

## **11. Display Screen Equipment - DSE**

### **Purpose of these guidelines**

The purpose of these guidelines is to give detailed guidance on:

- The action necessary to meet the requirements of the Health and Safety (Display Screen Equipment) Regulations 1992, known as the DSE Regulations.

### **Scope**

These guidelines apply to:

- All Housing Manager, staff and safety representatives

- All DSE and associated equipment operated by Millat and to which the DSE regulations apply
- The immediate work environment around DSE
- Millat office premises

## **Responsibilities**

Housing Manager and the Housing Officer are responsible for ensuring that:

- Suitable and sufficient risk assessments have been carried out for workstations used by users or operators and that the assessments are reviewed when necessary
- Workstations meet the requirements contained in the Schedule to the DSE Regulations
- Eye and eyesight tests have been arranged for users.
- Adequate training has been provided for users
- Suitable health and safety information has been provided for users and operators
- Adequate standards are achieved in the case of DSE to which the DSE Regulations do not apply

All employees who use DSE are responsible for:

- Ensuring that the workstations used by them has been subject to a risk assessment
- Organizing the workstation and work routine in accordance with the instructions received from IDS

## **Hazards**

The operation of DSE has been associated with a range of ill health symptoms related to the visual system and working posture. The hazards associated with the use of DSE are normally caused by poor work routine (prolonged use of the keyboard & visual display unit), and poor workstation design.

## **Control Measures**

In the case of DSE, risk control will consist of a combination of measures designed to eliminate or reduce hazards associated with the workstation and the work routine. Other essential risk control measures are adequate training and information for users and operators.

Housing Manager are responsible for implementing measures recommended in workstation risk assessments. The risks should be remedied as quickly as possible, and records of action made.

## **Training**

All users will be provided with health and safety training in addition to the training received in order to do the work itself. As the aim of the health and safety training should be to minimise the risks associated with the use of DSE it should include the following:

- Recognition of hazards and risks.
- Causes of risks
- Methods to be adopted by users to control risks, for example, correct set up of the workstation and the need to take breaks
- Methods of reporting problems with the workstation or ill health symptoms
- Information on the DSE Regulations, for example, eye and eyesight test and breaks from DSE work
- The necessity for users to contribute to workstation assessments.

### **Information requirements**

Operators and users will be provided with information as follows: -

- Risks from DSE and workstations
- Risk assessment procedures and risk reduction measures
- Breaks and activity changes
- Eye & eyesight
- Tests
- Modification of the workstation

### **Eye & eyesight tests**

- Users will be provided upon request with an appropriate eye and eyesight test. Once requested by a user, the test should be provided as soon as practicable after the request
- In the case of an employee who is to become a user and who has requested a test, the test must be carried out before the employee becomes a user.
- After the initial test users should be provided with subsequent tests at regular intervals, the frequency of which should be determined by the optometrist conducting the test.
- Millat will meet the cost of the eye and eyesight test
- Where glasses are required to correct vision defects at the viewing distance used specifically for DSE work Millat's contribution to the cost of glasses will be equal to the cost of a basic pair of glasses.

### **Monitoring and review**

Housing Manager should ensure, through both active monitoring and review of incidents of ill health which may occur, that there is continued compliance with these guidelines

## **12. Electricity at work**



The Electricity at Work Regulations 1989 apply to our workplace. We will fulfil our obligations under the Regulations.

All electrical systems on our premises will be checked to make sure that danger to anyone on site is prevented.

Housing Manager must make sure that any new equipment they purchase is CE marked and complies with the Electrical Equipment (Safety) Regulations 1994, where appropriate.

Wherever necessary, specialist electrical assistance will be obtained from outside the company

We will make sure that any electrical contractors employed to carry out electrical work on wiring or equipment are competent, belong to an appropriate body and comply with all relevant safety standards.

We will provide training for all staff in basic electrical safety and company procedures, to ensure that they:

- know how to use equipment safely
- know what they are not permitted to do
- understand what action they should take in an emergency involving electricity
- know who is authorised to carry out electrical work
- know who to report any electrical problems to.

All portable appliances are to be given a visual check by the user before their use. A thorough electrical test by a competent person will be undertaken at least once every one to five years, depending on the appliance and the results of previous assessments.

The fixed wiring installation supplying electrical sockets, lighting or other wired-in equipment will be inspected by a competent specialist electrical contractor every 5 years.

## **13. Fire and other emergencies**

### **Fire legislation**

The Fire Precautions Act 1971 requires all premises where 20 or more people are working at any time to have a fire certificate, issued by the local fire authority. This does not apply to Millat Office as there is less than 20 staff.

The Fire Precautions (Workplace) Regulations 1997 (amended in 1999) set out the fire safety arrangements that must be provided by the employer or person in control of the premises, e.g., landlord. The Regulations apply to most workplaces - one exception is construction sites.

That regulation puts a requirement on all employers to carry out a specific fire safety risk assessment.

Other legislation relevant to fire safety includes:

- Fire Precautions (Factories, Offices, Shops and Railway Premises) Order 1989
- Dangerous Substances and Explosive Atmospheres Regulations 2002
- Management of Health and Safety at Work Regulations 1999
- Health and Safety (Safety Signs and Signals) Regulations 1996.
- Regulatory Reform (Fire Safety) Order 2005 or "the Fire Safety Order" which applies across England and Wales and came into force on 1 October 2006.
- The Smoke-free (Premises and Enforcement) Regulations 2006

## **No Smoking Signs**

Housing Manager will be responsible for putting up relevant No Smoking signs on all premises managed by Millat and in the Millat's office. It is required by Law that from 1<sup>st</sup> July 2007 all enclosed communal areas in England must be smoke free.

## **Fire Safety Risk Assessment**

The Fire Safety Order places the emphasis on risk reduction and fire prevention. Under the Order, people responsible for commercial buildings i.e., the employer, owner, or any other person who has control of any part of the premises, are required to carry out a mandatory detailed fire risk assessment identifying the risks and hazards in the premises.

The risk assessment must be a written document if you have more than five employees. The responsible person for the premises is also required to:

- Consider who may be especially at risk.
- Eliminate or reduce the risk from fire as far as is reasonably practical and provide general fire precautions to deal with any risk.
- Take additional measures to ensure fire safety where flammable or explosive materials are used or stored.
- Create a plan to deal with any emergency and where necessary document any findings.
- Maintain general fire precautions and facilities provided for use by fire-fighters.
- Keep any findings of the risk assessment under review.

## **Fire hazards**

For a fire to ignite, there must be a source of ignition, fuel and oxygen. Sources of ignition which may be found in the workplace include:

- matches, lighters and lit cigarettes, etc
- electric and gas heaters
- overheating electrical equipment
- sparks from electrical sources, e.g., light switches
- sparks from maintenance operations
- deliberate acts of arson
- some chemicals.

Sources of fuel which may be found in the workplace include:

- storage of materials, e.g., paper and cardboard
- furniture and furnishings
- accumulation of waste materials
- flammable substances, e.g., stored solvents, gas cylinders, fuel for equipment.

## **Fire prevention**

The best way to reduce the risk of damage caused by fire is to prevent a fire starting in the first place. This involves controlling the potential sources of ignition and sources of fuel. Some methods of fire prevention are as follows.

The risk of fire caused by smoking materials may be reduced by having a no smoking policy. (Millat has a no smoking policy see section 25).

The risk of fire caused by electrical equipment may be reduced by:

- regular maintenance of wiring and equipment
- the use of fuses, circuit breakers and residual current devices
- switching off all equipment and systems when they are not in use
- training staff on how to avoid overloading systems and how to position hot equipment away from sources of ignition.

The risk of arson may be reduced by:

- increasing security on the premises, e.g., boundary fences to keep unauthorised people off the premises
- employing security guards
- using closed circuit TV
- increasing the level of lighting on the site
- implementing procedures for staff on how to deal with strangers they encounter on site.

Where there is a potential source of fuel for fires, systems and procedures should be in place to reduce the risks, for example:

- safe storage of flammable substances, following the requirements set out in the Highly Flammable Liquids and Liquefied Petroleum Gases Regulations 1972
- frequent removal of waste materials to a safe storage area, e.g., emptying wastepaper bins into skips in the car park every day
- keeping stores of paper, etc away from potential sources of ignition, e.g., electrical equipment, heaters, etc
- purchasing fire retardant furniture and fittings, e.g., chairs and carpets.

## **Responsibilities**

Housing Officer and Manager will be responsible for ensuring fire exits are clear at all times, that fire extinguishers are in good working order and appropriate for the particular workplace circumstances and that fire risk assessments are undertaken.

All employees are to familiarise themselves with the evacuation procedure for leaving their workplaces and reporting at designated assembly points in the event of the fire alarm being sounded.

Fire drills will be held at regular intervals to reinforce this procedure.

Smoke and fire alarms will be tested at regular intervals.

All staff must evacuate their work and take the roll call at the assembly point, reporting missing persons to the fire authority.

### **Fire extinguishers**

Fire extinguishers are an essential means of controlling a fire and reducing the damage caused. They are sited on brackets at suitable locations and contain an appropriate medium for the likely type of fire (e.g., water for paper fires, powder or carbon dioxide for electrical fires), ensure that you know where they are located and what they can be used for.

Portable fire extinguishers and fire blankets are inspected at least once a year by an external specialist.

There are four main types of portable fire extinguisher that may be found on the premises, i.e., water, foam, carbon dioxide and powder extinguishers. Different types of extinguishers are suitable for different types of fire.

Staff will be trained in when to use portable fire extinguishers and Fire blankets and the consequences of misuse of any fire fighting appliance.

Ensure that fire extinguishers are always easily available. They must never be hidden from view.

Health and Safety Representatives will undertake periodic checks.

### **Fire exits, manual call points and instructions**

Fire exits must be kept clear and free from obstruction at all times. Notices regarding, 'Fire Exits', or 'procedures in case of fire' are not removed or obscured. Manual Fire Alarm call points should never be obscured.

Make yourself familiar with the nearest Fire Exit to your workplace and how to release them.

Keep all internal fire doors closed when not in use. The staff are to check at regular intervals that the doors close into the frames and that closing devices operate in a satisfactory manner.

Internal fire doors are designed to restrict the spread of fire and to contain it until help arrives, these must not be propped open for any reason.

External areas to fire escapes are to be kept clear at all times, and not obstructed.

## **Discovery of a fire**

### **If you discover or suspect a fire:**

Raise the alarm immediately.

The Fire Brigade should be called immediately.

Ring the Fire Brigade on '999'.

Give operator your telephone number and ask for FIRE

When the Fire Brigade replies give details distinctly

**"Fire at \_\_\_\_\_"**

**Do not replace the receiver until the address has been confirmed by the fire brigade.**

Tackle the fire using available extinguishers ONLY if it is safe to do so and you have been trained in the use of the appropriate fire fighting equipment. If you are unsure, or if the fire spreads, do not endanger yourself.

## **Leaving the building**

Leave the building immediately by the front door. Taking with you any visitors you may see and assisting other people to evacuate when appropriate. Go directly to the assembly point. Do not re-enter the building until you have been instructed by the fire brigade.

Do not stop to collect your personal belongs.

Close doors behind you as you go.

Assist other people such as disabled or elderly to evacuate as you go, but do not delay yourself or go back.

At the Assembly Point the most senior member of staff present will check that everyone is present and can be accounted for. Missing persons should be reported to the fire brigade.

Do not re-enter the building until you have been advised that it is safe to do so by the 'Designated' person' or the senior person who will have received an instruction from the Fire Brigade.

Fire Drills will be carried out at regular intervals (but at least once a year) to ensure that all staff are familiar with the procedure.

Be sure that you know how to raise the alarm

Ensure that fire assembly points are clear and easily accessible.

### **Fire Exits**

Millat office has three fire exits by the front door, Rear Doors.

Fire exits must never be locked, bolted or barred during the time when people are working on the premises. Keep doors and access ways clear of all obstructions.

Be sure that fire exit doors are not obstructed on the outside.

Keep cardboard, waste bins and vehicles clear of the fire escape doors.

### **General**

Be aware of the risk of fire at all times. Do not touch faulty electrical equipment, overload sockets or misuse heaters.

Do not smoke in Millat offices or schemes.

Ensure that waste containers regularly cleared / emptied.

Do not stack goods where they could come into contact with light fittings or other electrical equipment.

Report all incidents or circumstances which could result in fire.

### **Fire instructions**

Read the notices carefully and be sure that you know what to do in the event of a fire.

Fire drill details will be logged by the 'Designated person', or the Housing Manager

## **14. Gas safety (installation and use) regulation 1998**

Millat as landlords is required to following, 'The Gas Safety (Installation and Use) Regulation 1998' to undertake an annual inspection of gas installation and appliances to which a duty extends and to ensure that those under Millat's control are maintained in a safe condition so as to prevent risk or injury to any person.

In order to discharge our duty, the following procedures are to be adhered to.

### **Comprehensive List**

A comprehensive list is to be maintained by the Housing Manager of all gas installations and gas appliances belonging to Millat. The safety risk relating to the installations and appliances will be stated.

Members of staff ordering additional installations and/or appliances or changes to the existing provisions are to ensure that the Housing Manager is informed of these, so that the register can be updated.

### **Contract for Safety Inspection and Servicing**

A contract for the Annual Safety Inspection of gas installations and gas appliances and the servicing of gas appliances is to be entered into in accordance with standing orders.

The Housing Manager will be responsible for arranging these through our gas service contractors.

### **First Appointment**

In consultation with the contractors Millat staff will make an appointment with the tenant via telephone followed by letter detailing to tenants' appointment dates and time (am or pm) 2 weeks ahead of appointment.

The contract will attend on the date and time of appointment to undertake safety testing and servicing of appliance as appropriate in accordance with the schedule and contract.

If access is not gained, to leave a pre-numbered non-access card requesting the tenant makes a new appointment.

Contractor to notify Millat in case of a tenant failing to give access.

No charge will be made for non-access at this stage.

### **Second Appointment**

Proposed dates for a second appointment will be given by the contractor for both broken appointments and following the leaving of non-access cards giving at least one month's notice. The client must confirm those appointments at least one week ahead of the appointment if the contractor is to attend.

Attending on the date and time of appointment following confirmation of the appointment.

To provide invoices in accordance with the conditions of the contract.

To provide the tenant with a copy of the annual safety check within 28 days of that check.

### **Contractual Arrangements - Client**

### **First Appointment**

The Housing Officer / Housing Manager are to try and contact all tenants prior to the first appointment to confirm that they will be available or to arrange a new appointment. Confirmation of appointments is to be recorded in the tenant's maintenance file

**NB:** The contractor requires at least one weeks' notice of any changes to the programme.

### **Second Appointments**

On receipt of update of non-access or broken appointments and the contractors list of proposed second appointments arrangements are to be made to contact each tenant and obtain confirmation of the appointment date and time (am/pm). At least 2 weeks' notice of the second proposed appointment date will be given by the contractor.

Following the issue of a non-access card a recorded delivery letter must be sent to the tenant requesting access. The letter is to include the date and time that access is required and stating that the tenant has 14 days to respond.

If a response is not given within the specified period a further recorded delivery letter must be sent including all above details stating that the tenant has 7 days to respond and if they fail to respond that Millat will apply to the courts for an injunction for access.

Clear monitoring of letter and response periods must be established to ensure that Millat has taken all reasonable steps to gain access for the required annual safety inspection of gas installations and appliances.

Confirmation of the appointment dates and time (am/pm) must be given to the contractor at least one week prior to the appointment if the contractor is to attend. However, if the contractor agrees, in certain circumstances, less notice is acceptable.

Every opportunity should be taken to discuss and gain access for the annual safety test of gas installations and servicing of Millat's gas appliances when contact is made with a tenant where previous access was a problem.

Authorising invoices in accordance with the condition of the contract and current guidance and practice notes.

### **Booking or amending appointments**

Tenants will be asked to contact the office if they wish to amend their current appointment or make a new appointment following either a receipt of a non-access card or broken appointment.

### **Records**



A comprehensive list of gas installation and gas appliances belonging to Millat will be maintained by the Housing Manager as set out above.

A test and service record/file are to be maintained by the Housing Manager for each property location which includes either gas installation and/or gas appliance connected.

The following information must be maintained:

- A copy of the landlords record sheet is attached
- Boiler Make/model
- Heating (Yes/No)
- Flue Type
- Risk Level of Appliance (L/M/H)
- Serial No
- Installed by
- Date installed (Maintenance Manager/yyyy)
- Date of Last Service (dd/Maintenance Manager/yyyy)
- Repair details

Copies of the following items are to be maintained on the service record/file for a period of 1 year and Microfiche for an additional 5 years.

- Letter to tenant detailing appointment for test and service.
- Tenants reminder notice of appointment.
- Slip from non-access cards.
- Correspondence between tenant and Millat /Contractor in respect of requests and arrangements for access for tests and servicing.
- Service report including repairs and works orders and condition of gas installations and appliances belonging to Millat
- Details of tenant's gas appliances connected to the gas installation.
- Gas Test Certificate, the service inspection sheet is to be signed by the tenant or a member of staff in respect of offices, stores etc belonging to the Association.

## **High Risk Installations and Appliances**

- To our knowledge there are no such appliances in any of Millat properties.
- Gas installations and appliances that have not regularly been inspected and serviced are of a higher risk.

## **Legal Action**

For reasons of Health and Safety it is clear that legal action must be taken in order to gain access in order that the Annual Safety inspection of gas installations and appliances are undertaken.

It is important in all cases of legal action that record systems and monitoring arrangements are of a high standard.

All letters and personal contacts with the tenant should be recorded with any response from the tenant.

Following discussion with the Landlord (if appropriate) on a tenant's failure to respond to the first recorded delivery letter for access the Housing Manager will commence court action.

## **New Tenants**

All new tenants are to be provided with a copy of the current safety check record on commencement of their tenancies.

Copies are to be obtained from the Landlord or from the Housing Officer or by member of staff responsible for the incoming tenant. This would normally be the Housing Officer.

## **15. Lone working**

### **Scope**

These guidelines apply to:

- All permanent Millat employees, temporary staff and voluntary workers
- All premises for which Millat has a responsibility
- Any other premises where Millat personnel visit or work on a full or part-time basis
- Any other locations at which Millat personnel are present during work time or traveling to whilst on Millat business

The following gives guidance on:

- Working safely and maintaining personal safety without close or direct supervision by a Housing Manager
- Lone travelling to, and visiting non-Millat premises
- Dealing with potential or actual violent incidents at work

A risks assessment will be undertaken prior to any member of staff undertaking lone working.

NB Please also refer to the section 'Violence at work'

## **Responsibilities**

Housing Manager are responsible for:

- Ensuring that risk assessments have been carried out for all persons under their control who are required, or might be required, to work alone to identify and implement specific risk controls which may be needed.
- Ensuring that lone workers have no medical conditions which might make them unsuitable for working alone
- Ensuring that risk assessments have been carried out to identify all situations where a risk of violence to all persons under their control exists
- Ensuring that all persons under their control are aware of, understand and comply with these guidelines
- Putting in place appropriate monitoring procedures to ensure lone workers and staff that may be exposed to violent incidents remain safe. This should include procedures for taking action if staff fail to make scheduled contact.
- Risk assessments are to be reviewed at least annually.
- All employees are required to:
  - Ensure that a risk assessment has been undertaken prior to undertaking lone working.
  - Comply with the relevant parts of these guidelines
  - Report to their manager or supervisor any circumstances which they consider may require additional controls to be introduced to reduce the risk
  - Report to their manager any incidents which occur, whether or not any personal injury has occurred

## **Hazards**

The main categories of hazards associated with lone working are listed below and the relevant risk control measures are described in a later section:

- Assault by a client

- Assault by a member of the public
- General and specific workplace hazards
- Emergencies, for example, fire, equipment failure, illness and accident
- Travelling between locations

**N.B.** Assault may be construed as an act, which has or is intended to have a damaging effect on an individual, irrespective of whether physical injury occurs. It includes verbal abuse, threats and physical assault.

## **Control measures**

The control measures required to eliminate or minimise the risks arising from the hazards identified earlier are described here. However, specific risk assessments will have to be undertaken if additional hazards are identified which may present a risk to any person working alone, or in an environment where it is believed that a significant risk of violence may exist.

The assessments should take into account factors such as the age, sex and physical and mental capabilities of the individual staff member, as well as the location at which they will be working or to which they will be travelling. They should also take into account the individual characteristics and case histories of clients with whom staff are in contact, and their current state and nature, such as:

- Physical and mental health
- Evidence of alcohol, drugs or other substance misuse
- In all cases where a staff member believes that they or a colleague are under threat of physical injury, consideration must be given to contacting the police as an emergency, or at a later date if it is felt that an ongoing threat exists. Medical assistance must always be sought if an assault takes place which causes physical injury to any person

## **Assault by a client**

- High-risk tasks, involving contact with clients who are known to be verbally or physically aggressive, should be assessed for appropriate staffing levels (example, two staff per visit or interview). Client files may be appropriately marked or tagged where specific controls are required to be implemented by staff when dealing with these clients
- Client interviewing should, where practicable, be carried out by experienced who have been formally trained in handling third party aggression. Risk assessment should identify those clients who should only be interviewed under controlled conditions on Millat premises

- Client interviewing at Millat premises should be carried out in a properly designed area which allows the interviewer to retreat to safety in case of assault, and 'alarm button' or personal alarm should be available. Ideally, interview areas should have two exit doors fitted with viewing panels

### **Assault by a member of the public**

- Staff should, wherever practicable, remain in a position of safety (for example, in a locked office or in a protected reception area) until they are assured that any visitor to Millat premises does not present a personal safety risk
- Staff should be aware of devices designed to raise the alarm in case of emergency and know the correct procedures for operating these
- An emergency contact telephone number list should be readily available, in addition to displayed instructions on how to contact the emergency services
- Access to adequate first aid facilities, in particular a properly stocked first aid kit, must be provided
- Where physical attack, threats or verbal abuse have taken place Millat will provide appropriate support for the member of staff, including counselling if required. Millat will consider taking legal action itself depending on the situation or, may pay the costs of the victim who chooses to prosecute the assailant(s).

### **Emergencies**

- Staff must be trained in fire prevention procedures and be aware of what action to take in the event of fire
- First aid facilities should be readily available, and in some cases, risk assessment may indicate that lone workers need training in first aid
- Emergency procedures should be prominently displayed at all Millat's premises to address all likely scenarios (including equipment and services failure)

### **Travel between locations**

- Staff should ensure all colleagues are aware of journey schedules, including location contact telephone numbers, address and persons visited, and estimated return times. A central diary will be in use in the office in which details of visits and return are to be recorded.
- Staff who regularly travel in the course of their work should carry with **them a personal alarm** and mobile telephone, a travel first aid kit in their vehicle, and ensure basic and routine vehicle maintenance is carried out to minimise the chance of breakdown

- Vehicle doors should be kept locked when travelling, and windows closed if driving through built-up areas
- All routes should be planned prior to departure to reduce the chance of becoming lost, or having to ask for directions
- Staff should park their vehicles as close to their workplace as possible, and in a well-lit location after dark. It is recommended, however, that staff make client visits or arrange appointments away from their usual workplace during daylight hours whenever possible
- Staff should carry the minimum amount of cash necessary when travelling and ensure that any valuables and jewelry are discretely carried or worn
- Housing Manager should make all persons under their control who travel alone, or are likely to travel alone, by any means of transport, aware of the personal safety issues which may have to be addressed in the particular circumstances

## Training

All persons, who are required to work alone, or with minimal supervision, must be competent to carry out their work safely and without risk to them self. Training is particularly important where there is limited supervision to control, guide and help in situations of uncertainty

Training may be critical to avoid panic reactions in unusual situations, and staff need to be sufficiently experienced and to understand the risks and precautions fully. Housing Manager should set the limits to what can and cannot be done while working alone and should ensure that staff are competent to deal with circumstances which are new, unusual or beyond the scope of training provided, for example when to stop work and seek advice, and how to handle aggression wherever it may arise.

Any member of staff who may be exposed to a risk of violence at work must receive appropriate training, which should cover as a minimum:

- Information on the causes of violent and aggressive behaviour
- Techniques for dealing with fear and anxiety (both staff and client)
- Recognition of risk scenarios
- Verbal and non-verbal communication skills
- Avoidance of 'trigger' behaviour which might encourage aggression or violence
- Defusing and calming strategies
- Breakaway techniques (removing oneself from the situation)
- Availability of support and counselling

- Remedial action following assault
- Information and instruction on specific control measures available (e.g., alarms)

This training will be given to staff members as part of their induction, and at appropriate intervals subsequently to ensure continued competence.

Staff must be made aware by their Housing Manager of the availability of support services should an assault occur, which should include preliminary counselling, ongoing victim support and an explanation of the criminal and civil legal remedies open to them.

### **Monitoring and review**

Housing Manager should ensure, through both active monitoring and a review of any incidents which occur, that there is continued compliance by all persons with this guideline.

Procedures should be put in place by Housing Manager to monitor lone workers and those exposed to risk of violence. These include the following:

- Housing Manager or supervisors periodically visiting and observing persons working alone, or in situations where a risk of assault could arise
- Telephone or radio contact at set intervals between the lone worker and another staff member
- The provision of devices designed to raise the alarm in the event of an emergency, and which are operated manually (for example, panic buttons and personal alarms) or automatically (for example, fire detection systems)
- Checks that a lone worker has returned to their base or home on completion of a task
- Staff are required to report to their manager all incidents which involve actual assault (whether physical injury occurs or not), verbal abuse or threats. A written record of the incident will then be made by the manager, forwarding a copy to the Chair

## **16. Management, monitoring and maintenance of playgrounds and play equipment**

As of May 2015, Millat does not manage nor have any responsibility for management of any playgrounds or play equipments. In future if this changes then appropriate safety and maintenance procedure will be adapted.

## **17. Manual handling**

As far as it is reasonable, Millat has an obligation to ensure that employees are protected from injury, which may be caused through manual handling. Regulation 4 of the Manual Handling Operations Regulation 1992 advises employers shall 'take appropriate steps to reduce the risk of injury, to those employees carrying out manual handling, to the lowest level practical.

When an employee informs her employer that she is pregnant, the risk to the health and safety of the worker and her unborn child must be assessed in accordance with the Management of Health and Safety at Work Regulation 1999 MHSW.

The Disability Discrimination Act 1995 (DDA) places a duty on employers to make reasonable adjustments to the workplace or employment arrangements so that a disabled person is not at any substantial disadvantage compared to a non-disabled person.

## **Risk Assessments**

As part of the Risk Assessment regularly undertaken, Millat will take regard of the relevant sections of the MHSW regulations 1999 and the above.

The assessment will take account of the:

- Task
- Load
- Working environment
- Individual capability

Millat will avoid hazardous manual handling operation so far as is reasonably practicable

Millat will reduce the risk of injury so far as is reasonably practicable and where practical avoid manual handling.

Housing Manager are to ensure that risk assessments have been undertaken prior to the task being undertaken.

## **Review of Assessments**

The assessments are to be reviewed at least once every five years and when any changes to the task is proposed.

## **Responsibilities**

Housing Manager are responsible for:

- Ensuring that a risk assessment has been undertaken for every manual handling task and the person due to undertake that task
- Ensuring that all persons under their control are aware of, understand and comply with these guidelines



- Ensuring that risk assessments are reviewed at least every five years and when any changes are proposed to the task or person undertaking the task
- Ensuring that a risk assessment has been undertaken prior to the introduction of a new task.

All employees are required to:

- Ensure that a risk assessment has been undertaken prior to undertaking a manual handling task
- Comply with the relevant parts of these guidelines and the controls that have been put in place to protect them and others
- Report to their manager any circumstances which they consider may require additional controls to be introduced to reduce the risk or the need of manual handling.
- Report to their manager any incidents which occur, whether or not any personal injury has occurred

## **18. Monitoring of safety**

The safety of the organisation will be constantly monitored by several means, including:

- Regular inspections of all workplaces by the appropriately trained Housing Manager.
- Investigation of all known accidents
- Monitoring entries in accident books and any other health and safety recording systems
- Monitoring of overall statistics on accidents and health problems which appear to arise at work.

It is important to maintain health and safety records, monitoring, action and reviews, this will help to demonstrate that Housing Manager are exercising due diligence.

The Housing Manager is responsible for seeing that all reasonable steps are taken to remedy health and safety problems and defects discovered by this monitoring.

The Management Committee will review the Health & Safety policy and the organisation's arrangements for carrying out that policy to ensure compliance.

## **19. Personal protective equipment – PPE**

Personnel protective equipment should always be regarded as a last resort for the protection against risks to safety and health. Engineering controls and safe systems of work should always be considered first.

Millat aims to comply with the requirements of the 'Personal Protective Equipment at Work Regulation 1992.

Risk assessments will highlight what Personnel protective equipment is required to protect employees from any remaining risk to their safety and health. This equipment could include:

Coveralls, overalls, cold and wet weather protection, head, hand and eye protection. Any PPE purchased should meet European standards and should carry the CE marking as required by the directive.

### **Responsibilities**

Housing Manager is responsible for:

- Ensuring that risk assessments have been undertaken
- Ensuring that appropriate personal protective equipment (PPE) is made available and is in a good condition
- Ensuring that persons under their control are trained in the correct use of the personnel protective equipment provided and use it as set out in the risk assessment
- Ensuring that all persons under their control are aware of, understand and comply with these guidelines

All employees are required to:

- Comply with the relevant parts of these guidelines and the controls that have been put in place to protect them and others, this includes the use of the appropriate personnel protective equipment
- Report to their manager any circumstances which they consider may require additional controls

### **Training**

Millat will provide appropriate training in the use of personnel protective equipment

## **20. Pressure equipment regulation**

As of May 2015, Millat has no maintenance responsibility of any pressure plant and equipment. In future if this changes then appropriate safety and maintenance procedure will be adapted.

## **21. Protection from abuse of vulnerable adults**

Millat, as an organisation provides homes to people, some of whom are vulnerable, has a duty to protect its vulnerable tenants. All allegations of abuse of a vulnerable adult will be treated seriously

The procedures for alerting, reporting, investigating allegations of abuse should be discharged fully and promptly, in accordance with the policy and procedures which are contained in this document.

All action taken under Millat policy and procedures must be carried out sensitively, taking account of the individual needs of vulnerable adult's, including race, culture and ethnicity, age, gender, religion, disability or sexuality.

An individual's communication needs should be considered at all times.

Practice will be based on the following values:

- Privacy
- Dignity
- Choice
- Independence
- Rights
- Fulfilment

Vulnerable adults should be allowed and helped to make their own decisions based on an awareness of the choices available. It is recognised that there will be situations where a vulnerable adult chooses to remain in a situation perceived by professionals to be risky or dangerous.

The principle of self-determination is important but may need to be reconsidered if a vulnerable adult is unable to make an informed choice, where there is a risk to life or limb or where a statutory responsibility exists.

Millat is working to develop a culture in which day to day practice promotes the protection of vulnerable adults. This may be achieved by

- Acknowledging that abuse 'could happen'
- Effective service user and carer involvement
- Accessible 'complaints' procedures
- Openness between and among staff and tenants

- A willingness to reflect upon and constructively criticise practice
- A clearly defined sense of purpose which is supported by agreed and acceptable quality standards.

Leaflets and handbooks will be available to vulnerable tenants on the policy and procedures for protecting them from abuse.

## **Policy and procedures**

### **Definitions:**

The term 'vulnerable adult' refers to any person aged 18 years and over who:

'.. is or may be in need of community care services by reasons of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or serious exploitation.'

'Who decides' Lord Chancellor's Dept 1997

The term adult abuse if can be defined as

'Physical, sexual, financial, emotional, discriminatory or psychological violation or neglect of a person unable to protect him/herself to prevent abuse from happening. Or to remove him/herself from abuse or potential abuse by others.'

### **The charity, Action on Elder Abuse, defines elder abuse as**

"A single or repeated act or lack of appropriate action occurring within any relationship where there is an expectation of trust, which causes harm to the older person"

Action on Elder Abuse, 1998

### **How this policy applies to Millat and Millat's staff**

This policy applies to any vulnerable adults living in accommodation managed by Millat.

Although Millat manages provides self-contained accommodation to all its tenants, and does not provide nursing care or personal care, it does have a duty of care to all tenants, and where these tenants are vulnerable, staff should be alert for signs of abuse and take appropriate action in line with Millat policy and procedures.

All Millat management staff have a responsibility of being familiar with Millat's policy and procedure for dealing with allegations of adult abuse.

Millat staff must also comply at all times with Millat's Code of Conduct in their dealing with tenants, and breaches of this could in some instances constitute adult abuse as well as a disciplinary offence.

## Millat **Recruitment procedures**

Will include checks on applicants for staff working directly with vulnerable tenants to ensure they have no past history which would make them more likely to be perpetrators of adult abuse. Millat will comply with legal requirements for police checks to be carried out.

### **Types of abuse:**

Action on Elder Abuse recognises five main types of abuse:

- **Physical**

The non-accidental infliction of physical force that results in bodily injury. It includes hitting, slapping, burning, pushing, restraining, or giving too much medication or the wrong medication.

...a person is slapped, or locked in their room, or physically restrained to control their behaviour

- **Psychological**

The use of threats, humiliation or other forms of mental cruelty that results in mental distress. It includes the denial of basic human and civil rights, as well as shouting, swearing, frightening, blaming, ignoring, or humiliating a person.

...a person is made fun of, or called names, or ignored

- **Financial**

The unauthorised or improper use of a person's property, money, pension book or other valuables.

...a person is forced to give staff or others money or gifts

- **Sexual**

Forcing a person to take part, directly or indirectly in any sexual activity without their consent – this can occur in any relationship;

.... Non-contact: – indecent exposure, photography, pornography.

Contact: – physical contact or attempted physical contact of a sexual nature.

- **Neglect**

The repeated deprivation of assistance that the person needs for activities of daily living. It includes the failure to intervene in behaviour, which is dangerous to the older person, as well as deprivation of food, heat, clothing, or comfort, stimulation, or social contact or essential medication and attention.

... a person is denied help with eating, or is left in unhygienic conditions

Other types of abuse which are recognised are:

- **Discriminatory abuse**

The exploitation of a person's vulnerability, resulting in exclusion from opportunities. It includes discrimination on the basis of race, gender, age, sexuality, disability or religion.

.. unequal treatment, verbal abuse of a racial nature, slurs, harassment etc.

- **Institutional abuse**

Mistreatment by a regime or by the individuals within the institution. It can occur when the routines or the systems within an institution take precedence over an individual's preferred lifestyle. Every institution needs some systems in order to protect the rights of those who live and work there, but this can be abusive when the systems become too dogmatic, rigid or inflexible

. putting all residents in their night clothes by 7pm

### **Possible perpetrators of adult abuse**

The perpetrator of adult abuse can be one of the following [this list is not exhaustive]:

- A member of staff, can be front line and/or management staff
- A member of a recognised professional group
- A volunteer or member of a community group
- Another service user
- A spouse, relative or member of the person's social network
- A carer
- A neighbour, member of the public or stranger
- A person who deliberately targets vulnerable people in order to exploit them

### **Possible signs of abuse**

A range of indicators, if present, may suggest the possibility of some form of abuse or neglect. **None of them mean that abuse has taken place but should encourage further investigation.**

#### **Physical signs**

- Multiple bruising – including bruising in well protected area, e.g., the inside of thighs or upper arms
- Finger marks
- Burns, especially in unusual places
- An injury similar in shape to an object
- Unexplained fractures
- Under or overuse of medication
- A person who tries to hide part of their body on examination

#### **Psychological signs**

- Uncharacteristic change in mood or behaviour

- Acting withdrawn, frightened, anxious or agitated
- The person makes great efforts to please
- A person is reluctant to be cared for by a particular member of staff
- A person appears frightened or apprehensive before, after or during a visit from a relative or visitor

### **Financial signs**

- Unexplained withdrawals from a person's bank account
- The disappearance of bank statements, jewellery, money or personal possessions.
- Sudden transfer of assets to a relative
- Reluctance on the part of relatives to pay for replacement clothes or other necessities
- Inappropriate requests to a worker to witness changes to a resident's will

### **Sexual signs**

- Pain, itching or injury in the anal, genital or abdominal area
- Venereal disease or recurrent bouts of cystitis
- An uncharacteristic change in a person's behaviour or attitude to sex

### **Neglect**

- Weight loss
- Pressure sores, skin ulcers or uncharacteristic problems with continence
- Insufficient food or drink, or a diet which does not meet with a person's religious, cultural, or medical needs
- Unkempt appearance, unshaven, inadequate or dirty clothing or poor hygiene
- A person who is left in a wet or soiled bed.

### **Possible factors that may contribute to adult abuse**

#### **Poor quality of long-term relationships:**

- Role reversal
- Social isolation
- Stress
- Alcohol or drug problems
- Mental health problems
- A carer's inability to provide the level of care needed

#### **Institutional**

- Poor staffing levels
- Lack of supervision
- A lack of communication between shifts, between carers and Housing Manager and between care staff and residents
- Staff are inadequately trained for the tasks they need to perform
- Staff are unaware of the organisation's policies and procedures on dealing with adult abuse
- Staff feel unsupported in bringing concerns to management

<b>Role of Millat staff</b>
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Millat staff does not provide personal care, but it can be seen from the above that, adult abuse could take place in a number of situations.

Millat may have some vulnerable tenants in their general needs flats that they manage, and this policy and procedure should be applied to them. If they become aware or suspect abuse of vulnerable tenants, they should immediately speak to the Housing Manager.

### **Intervention in possible adult abuse**

When considering the appropriateness of intervention, the following factors need to be considered:

- The vulnerability of the individual
- The nature and extent of the abuse
- The length of time it has been occurring
- The impact on the individual and
- The risk of repeated or increasingly serious acts involving this or other vulnerable adults.

What this means in practice is working through a process of assessment to evaluate:

- Is the person suffering harm or exploitation?
- Does the person suffering or causing harm/exploitation meeting the NHS & Community Care Act [1990 eligibility criteria?
- Is intervention in the best interest of the vulnerable person and/or in the public interest?
- Does the assessment account for the depth and conviction of feelings of the person alleging the abuse?

### **Capacity and self determination**

The ability of the alleged victim to understand and make decisions also needs to be taken into account:

- **Risk:**  
Does the individual appreciate and understand the nature and consequences of any risk they may be subject to and if so, do they willingly accept such a risk?
- **Self determination:**  
Is the individual able to make their own decisions and choices and do they wish to do so?
- **Consent:**  
Did the person subject to abuse consent, and did he or she do so willingly?
- **Capacity:**  
Does the person subject to abuse have the capacity to understand what they are consenting to, or alternatively, do they have the capacity to refuse?



## Working with adult abuse - what to do if you suspect abuse

Below is a **summary** of what you should do:

- Always talk to the person in a safe and private place
- Take the complaint seriously - do not dismiss it.
- Listen sensitively, but do not ask leading questions
- Remember the importance of confidentiality and the boundaries of confidentiality. If your tenant starts to disclose about abuse you must remind them about the boundaries of confidentiality i.e., that you, as a professional, have a duty of care and will have to inform your manager.
- Don't keep the concerns to yourself. It is important that you report any suspicions to your Housing Manager as soon as possible.
- If your Housing Manager is not available or you suspect they are the abuser, speak to another senior manager.
- Do not discuss the subject with or challenge the alleged abuser
- Write it down - It is important that you record any unusual behaviour, bruising etc and also keep a written record of the name and time that you reported the suspicions to your Housing Manager [*pro forma Appendix 6*]
- Where the abuse is very serious and involve a criminal offence and/or injury, you should call the relevant emergency services immediately [e.g., police, ambulance], informing your Housing Manager as soon as possible.
- Do not touch or clean up any possible forensic evidence
- Know what Millat's policy is in regard to abuse and also know the policy of your local authority [*See Appendix 4 for details of who to contact in the local authorities area where IDS works*]
- For advice and support on elderly person abuse, you may wish to contact
  - Action on Elder Abuse  
Astral House  
1268 London Rd  
London NW16 4ER  
National Careline Mon-Friday 10am to 4.30pm 0800 069 9784

Further details on some of the points above are dealt with in the **Appendices**

### Allegations against Millat staff

If the complaint involves a colleague or a manager, you may wish to get independent advice in relation to 'whistle blowing' protection.

Contact

Public Concern at Work  
Suite 306  
16 Baldwin Gardens  
London EC1N 7RJ  
Tel 020 7404 6609

Action needs to be taken under the appropriate personnel procedures. It is important that the action taken

- Protects the rights and wishes of the vulnerable adult
- Protects the rights of the member of staff concerned
- Enables Housing Manager to take appropriate action either on behalf or the vulnerable adult or against the staff member where appropriate.
- Attention should be given to the use of whistle blowing procedures.

If there is a possibility of a criminal offence and the tenant is asking to involve the police, a criminal investigation should take precedence.

Where the tenant is unwilling to make a formal complaint to the Police, IDS senior Housing Manager need to carefully consider whether they have a duty to report the matter to the Police directly, this decision should be based on the risk to the service user, the risk to others and the seriousness of the allegation. If the tenants (service user) lack the capacity to consent, IDS Housing Manager need to make a decision in the best interest of the tenant.

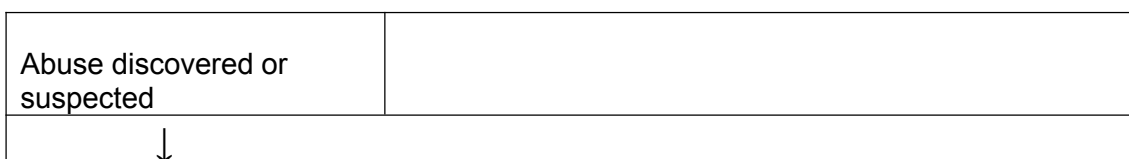
### **The Public Interest Disclosure Act 1998**

This Act protects employees against dismissal and other adverse action if they make complaints or public disclosures about malpractice. Such matters include allegations that the employer is putting the environment at risk, breaking the law or putting customers or employees at risk. Workers do not have protection if they 'go public' without first raising the matter internally with the employer, unless the worker can show that they believe raising the matter this way would be ineffective, would lead to a cover up or would result in retribution.

#### **Actions by Millat staff to protect themselves against allegations of adult abuse**

- Where there have been difficulties in the past concerning allegations of abuse, Millat staff should not visit the tenant alone.
- Millat should not handle money from tenants [e.g., taking rent] without the exchange of written receipts signed by both parties.
- Where a tenant alleges belongings or money have gone missing, any search of the tenant's flat should always be done with more than one person present
- Millat staff should not get involved in sexual relationships with vulnerable tenants under any circumstances. This is a breach of professional boundaries.
- Millat staff are not permitted to be beneficiaries of an Millat tenant's will
- Millat staff are not permitted to act as executors of a tenant's will

### **Flowchart for potential alerts of adult abuse**



Is vulnerable adult in immediate danger?	→ <b>Yes</b> → → → →	
And/or has a crime been committed?	↓	
And/or is there a need to protect forensic evidence?		
<b>no</b> ↓	Contact Emergency service e.g., police, ambulance, GP	
Consult with Manager whether adult protection referral appropriate	↓ ← ← ← ← ← ←	
↓		
Adult Protection issue confirmed?	→ <b>NO</b> →	No further action under these guidelines. Consider other options; consider whether another adult or child is at risk. Record accurately the details of the incident and the outcome of the discussion with manager
<b>yes</b> ↓		
Is there substantial evidence of a serious crime being committed?	→ <b>NO</b> → → → →	
<b>Yes</b> ↓	↓	
Contact Police →	Record all information and pass to Police or Social Services	←Contact Social Services
↓	↓	
Police to initiate adult protection guidelines		Social Services to initiate adult protection guidelines

## Investigating individual cases of abuse

Any investigation may involve one or all of the following:

- An adult abuse enquiry
- A police investigation into a possible offence
- A disciplinary procedure where allegations may amount to misconduct or gross misconduct on the part of staff

The local authority Social Services department has the lead responsibility for investigating and managing the abuse investigation.

Where there is a possibility of a crime having been committed, the suspected crime should always be reported to the Police. The police will be lead agency in these cases.

The lead agency [either Social Services or the Police] is responsible for

- Determining the most appropriate way to investigate the allegations or concerns
- Carrying out the investigation
- Liaising with other agencies and coordinating the contribution of professionals
- Convening, chairing and recording any strategy meetings or case conferences.

**Role of Millat's Housing Manager:**

- To receive the initial report of abuse
- To ensure the person reporting abuse follows procedures and is given advice and support
- To ensure the interests of the Millat tenant who is the victim of abuse is paramount throughout
- To report allegations of abuse to appropriate authority [see above]
- To cooperate in the investigation that follows
- To take whatever action is recommended as a result of the multi agency investigation
- To take any necessary action to safeguard other tenants/service users
- To review Millat policies and procedures to minimise risk of similar abuse reoccurring.

## Appendix I

### Confidentiality - key principles

- Information given to an individual member of staff belongs to the organisation and not the individual employee. Therefore, decisions to share the information about a tenant with other agencies or third party, without the consent of the tenant should be made by Millat and not by the individual acting on their own.
- Individual members of Millat staff are bound by Millats' Confidentiality Policy
- Decisions to share information concerning a tenant with other agencies can normally only be made with the expressed consent of the tenant
- Although the views and wishes of the user will normally be respected when sharing the information they give Millat staff, IDS cannot guarantee a fully confidential service. There will always be an exceptional circumstance when a duty to protect the wider public interest outweighs the responsibility to any one individual.
- Information given to Millat should only be used for the purposes for which it was intended
- Users and carers should be advised why and with whom information will be shared
- Information about a tenant should only be shared within Millat and with other agencies on a need to know basis to support the effective delivery of services to that person
- Staff have a clear duty to report any concerns they may have relating to the abuse or suspected abuse of a child or vulnerable adult to their Housing Manager at the earliest opportunity.
- If information is received about possible abuse from a member of the public or other third party, it is important to clarify whether that informant is prepared to be identified. It may be necessary to discuss with the informant how effective the information will be if he/she is not prepared to be identified or to come forward as a witness. Where legal proceedings are involved, it may not be possible to guarantee anonymity.

### Guidance to those who alert others of adult abuse

#### Responding

The way you respond to the vulnerable adult is important

- Remain calm and try not to show any shock or disbelief
- Listen very carefully to what you are being told
- Demonstrate a sympathetic approach by acknowledging regret and concern that this has happened
- Reassure the person by telling them that
  - they have done the right thing by sharing the information with you
  - you are treating the information seriously
  - the abuse is not their fault
- Be aware of the possibility of forensic evidence if the disclosure refers to a recent incident
- Explain that you are required to share the information with your Housing Manager, but not with other staff or service users.
- Reassure the person that any further investigation will be conducted sensitively and with their full involvement, wherever possible
- Reassure the person that IDS will take steps to support and, where appropriate, protect them in the future
- Report the information to your line manager at the earliest opportunity
- Make a written record of what the person has told you.
- Do not stop someone who is freely recalling significant events; allow them to share whatever is important to them.
- Do not ask questions or press the person for more details [this may be done during any subsequent investigation, so it is important to avoid any unnecessary stress and repetition for the person concerned.
- Do not promise to keep secrets
- Do not make promises you are unable to keep

- Do not contact the alleged 'abuser' or alleged 'victim' [depending on who is sharing the information.
- Do not be judgmental [e.g. why didn't you try and stop them?]
- Do not break the confidentiality agreed between the person disclosing the information, you and your Housing Manager.

## Reporting

You have duty to report if you see, hear about or suspect abuse:

- Take urgent action as appropriate to protect the vulnerable adult from any immediate danger
- Pass on the information to the relevant manager
- Avoid asking investigative questions or making comments about what has happened
- Act in accordance with the vulnerable adult's wishes where possible
- Support and reassure the vulnerable adult throughout.

## Recording

Accurate and detailed recording is essential:

- Complete the appropriate alert form [**see appendix 6**]
- highlight if the person alleged responsible is themselves a vulnerable adult
- forward the form to the appropriate Social Services team
- record in your scheme/estate that an adult protection alert has been raised
- consider the issues around confidentiality
- consider whether potentially violent situations could arise for staff involved at a later date
- make a note of the date, time and setting in which the allegation was made or the event was witnessed
- make a note of anyone else who was there at the time
- record what was said using the person's own words
- separate factual information from any opinions expressed
- date and sign your report
- Write the report in black or blue ink
- Remember your report may be required as part of any legal action or disciplinary procedures
- Keep a copy for future reference.

## Appendix 3

### The Law and adult abuse

There is no one single piece of legislation for protecting adults as there is for child abuse, since the law assumes that adults are responsible for their own actions.

The existing criminal legislation may be appropriate for adult abuse cases, but many people may be unwilling to undertake legal proceedings. Vulnerable people at risk may remain in dangerous situations because they refuse all help, or the staff have no power to act.

Protection is available through civil and criminal courts both to prevent a person being abused and to take action against the perpetrator. The legislation is a patchwork however, making it difficult to understand, and/or enforce. Comparatively little use has been made of the law, and many people are unwilling to undertake legal proceedings.

Legislation and preventative statutes which may be relevant in case of abuse include:

#### Criminal legislation:

- Offences against the Person Act [1861] [*Actual Bodily Harm, Wounding with intent to do harm*]
- Police and Criminal Evidence Act [1984] [*gives police the power to search and enter, and to arrest without warrant to prevent them causing injury to others*]
- Criminal Justice Act 1998
- Sexual Offences Act 1956 and 1985 [*indecent assault, rape, incest. Makes it an offence for men to 'procure a defective woman'*]
- The Race Relations Act 1976 where *the abuse is of a racist nature*



#### Civil law - injunctions and exclusion orders i.e.

- The Family Law Act 1998 for *those suffering domestic violence*
- Protection from Harassment Act 1997 - *creates an offence of harassment and is intended to provide for conduct falling short of physical assault.*

#### Particular needs of certain groups of older people

- The Mental Health Act 1983 - *provides power for care where the vulnerable person is mentally ill and believed to be suffering from mistreatment. Also allows for Guardianship Orders.*

#### Laws empowering agencies or professionals to act - a range of acts including

- The National Assistance Act 1948 - *provides care and support for vulnerable adults. Section 47 of the Act allows for the removal of a person from their premises if considered to be mentally or physically incapacitated and in need of protection.*
- The NHS and Community Care Act 1990 - *places a duty of local authorities to assess those in need of social services and to co-ordinate the service provision, including the need for protection in the case of vulnerability*
- No Secrets - the Protection of Vulnerable Adults - *government guidance [Dept of Health 2000] which formalises the responsibility of local authorities to take a lead role in abuse protection*
- The Carers [recognition and services] Act 1995 - *places a duty on local authorities to provide an independent assessment of carers needs*
- Care Standards Act 2000 - *establishes a single national care standards commission responsible for the regulation of residential nursing homes and independent hospitals*

#### Financial protection

- Arrangements can be made for the Court of Protection to manage the financial affairs of someone who is mentally incapable
- A power of attorney, enduring power of attorney and the appointee system of the Department of Social Security may be helpful in some instances of financial abuse.

#### Compensation Law - enables a private action to be taken against an individual in the civil courts for compensation

#### Anti-discrimination legislation - the law relating to disability rights, race relations and gender issues that ensure that people receive services on an equal footing.

- Disability Discrimination Act 1995 - *makes it unlawful for providers of services to discriminate against a disabled person*
- Race Relations Act 1976

#### For employees

- The Public Interest Disclosure Act 1998 - *protects employees disclosing a public concern providing they are acting reasonably.*

## Appendix 4

### Contacts for help in dealing with elder abuse and vulnerable adult abuse

#### **MERTON**

Action on Elder Abuse,  
PO Box 60001,  
Streatham,  
Postcode  
SW16 9BY

Telephone  
080 8808 8141 (Helpline)  
020 8835 9280

E-mail  
[enquiries@elderabuse.org.uk](mailto:enquiries@elderabuse.org.uk)

Website  
[Action on Elder Abuse Website](#)

#### **Domestic Violence**

(Always ring police control rooms with 1<sup>st</sup> referral)

MERTON

Safer Merton  
Merton Council  
Civic Centre  
London Road  
Morden  
SM4 5DX  
Telephone: 020 8545 4146  
Email: [safer.merton@merton.gov.uk](mailto:safer.merton@merton.gov.uk)

### **MIND (National Association for Mental Health)**

If you have a general query about the organisation, our contact details are:

#### **Mind**

15-19 Broadway, Stratford, London E15 4BQ  
T: 020 8519 2122, F: 020 8522 1725  
e: [supporterservices@mind.org.uk](mailto:supporterservices@mind.org.uk)

### **AGE CONCERN**

MERTON  
Elmwood Centre  
277 London Road  
Mitcham, CR4 3NT.

020 8648 5792

#### **Email**

[info@ageukmerton.org.uk](mailto:info@ageukmerton.org.uk)

### **Public Concern at Work**

Suite 306  
16 Baldwin Gardens  
London EC1N 7RJ  
Tel 020 7404 6609

**Victim Support** - national Tel line 0845 3030900

**Useful reports**

- No Secrets - the Protection of Vulnerable Adults - *government guidance [Dept of Health 2000] which formalises the responsibility of local authorities to take a lead role in abuse protection*
- East Sussex County Council 'Multi Agency Policy and Procedures for the Protection of Vulnerable Adults'

**Form for reporting adult abuse**

Name of victim .....

Address .....

.....

Date of birth .....

Telephone number:

Name and telephone of GP:

**Details of alerter**

Name

Position

Employer/agency

Date complaint received:

Does the alerter wish to remain anonymous?

YES/NO

Has it been explained that anonymity may limit the investigation?

YES/NO

Brief details of reported abuse:

Details of who the complaint was reported to by the alerter [*in most cases this should be their Housing Manager*]:

Name:

Position

Date

**For Housing Manager:**

Was complaint reported to Social Services? YES/ NO

If yes: Name, address & tel. no of social services officer to whom report passed:

Date:

Were the police informed?

YES/ NO

Was the GP informed?

YES/ NO

Were other medical services involved/ informed?

YES/ NO

## **22. Reporting injuries, disease and dangerous occurrence – RIDDOR**

### **Requirement under the regulation**

With the introduction of the reporting of injuries, disease and dangerous occurrences. Regulation 1995 (RIDDOR 95). Millat is required to record and report certain injuries, diseases and dangerous occurrences as set out in the Health and Safety Executive.

### **Recording and reporting injuries**

It is important that details of any injuries are maintained within an accident book at your place of work for a minimum period of 3 years and should include the following information, as set out in the Schedule of the Regulations.

- In the event of an accident suffered by a person at work.

Date and time of the accident  
Full name of person injured  
Occupation  
Nature of injury

- In the event of an accident suffered by a person not at work, the following particulars of that person are to be recorded.

Full name of person injured  
Status (e.g., visitor or bystander)  
Place where the accident happened  
A brief description of the circumstances in which the accident happened.  
The date on which the injury was first reported to the relevant enforcing authority  
The method by which the injury was reported

If you are taking a telephone message from a member of staff reporting their absence from work it is important to ask whether it is due to an industrial injury (including acts of physical violence). If it is the information above must be obtained and the head of the Department informed.

In the case of the absence of the Department Head the information is to be given to another Department head or the Chief Executive.

The Industrial Injury Section on the existing sickness notification memorandum is to be completed and Department Heads are required to recommend to the finance department whether or not payment of salary is to continue during the period of sickness.

## **Reporting injuries to the Health and Safety Executive**

Deaths, a major injury or those resulting in an absence from work for more than 3 days are to be reported to the enforcing authority.

NB. The enforcing authority for Millat is the Local Authority.

### **Reporting a Death or major injury**

If there is an accident connected with work those results in either

- A death or a major injury to an employee (this includes physical violence) or a member of the public is killed or taken to hospital.
- The enforcing authority must be notified immediately by the quickest practical means (normally by telephone).  
A completed accident report form (F2508) must be forwarded within ten days.

## **Responsibilities**

### **Housing Manager**

It is the responsibility of the HM to ensure that accidents are reported, and forms are forwarded. If within one year of an accident an employee dies as a result of a reportable injury the enforcing authority is to be informed in writing.

### **All other Staff**

It is the responsibility of all staff members to report to their Housing Manager, deaths or accidents that are to be reported to the Health and Safety Executive  
The following are classed as a major injury and are therefore reportable.

- Fracture other than to fingers, thumbs or toes.
- Amputation
- Dislocation of the shoulder, hip, knee or spine.
- Loss of sight (temporary or permanent)
- Chemical or hot metal burn to the eye or any penetrable injury to the eye.
- Injury resulting from an electric shock or electrical burn leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours.
- Any other injury leading to hypothermia, heat-induced illness or unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours.
- Unconsciousness caused by asphyxia or exposure to harmful substances or biological agent.
- Acute illness requiring medical treatment or loss of consciousness arising from absorption of any substances by inhalation, ingestion or

- through the skin.
- Acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.

### **Over three-day injury**

Accidents (including act of physical violence), which results in absence from work for more than 3 days including non-working days but excluding the day in which the accident occurred must be reported to the enforcing authority (on form 2508) within 10 days of the accident.

### **Reporting cases of disease**

If a doctor notifies Millat that an employee suffers from a reportable work-related disease as set out in part II of schedule 3 of the Regulations (see summary below) this must be forward to the enforcing authority.

### **Summary of reporting disease**

- Certain poisonings
- Some skin diseases such as occupational dermatitises, skin cancer, chorme-ulcers, oil folliculitis/acne.
- Lung diseases including occupational asthma, farmers lung, pneumoconiosis, asbestosis, mesothelioma
- Infectors such as: leptospirosis, tuberculosis, anthrax, legionellosis and tetanus
- Other conditions such as: occupational cancer, certain musculoskeletal disorders, decompression illness and hand-arus vibration syndrome

Department heads are required to complete (form 2508A) and forward to the enforcing authority on receiving notification from a doctor of a work-related disease.

### **Reporting dangerous**

The Housing Manager is to be informed of all dangerous occurrences. If something happens which does not result in a reportable injury, but which clearly could have done, then it may be dangerous occurrence which must be reported immediately to the enforcing authority (normally by telephone).

The completed report form (F2508) must be forwarded within 10 days to the enforcing authority by the head of the department.

It is the responsibility of all staff members to report dangerous



occurrences that could have resulted in a reportable injury these are to be reported to the heads of departments.

**Reportable dangerous occurrences are:**

- Collapse, overturning or failure of load-bearing parts of lifts and lifting equipment.
- Explosion, collapse or bursting of any closed vessel or associated pipe work.
- Failure of any freight container in any of its load-bearing parts.
- Plant or equipment coming into contact with overhead power lines.
- Electrical short circuit or overload causing fire or explosion.
- Any unintentional explosion, misfire, failure in demolition to cause the intended collapse, projection of material beyond a site boundary, injury caused by an explosion.
- Accidental release of a biological agent likely to cause severe human illness.
- Failure of industrial radiography or irradiation equipment to de-energise or return to its safe position after the intended exposure period.
- Malfunction of breathing apparatus while in use or during testing immediately before use.
- Failure or endangering of diving equipment, the trapping of a diver, an explosion near a diver, or an uncontrolled ascent.
- Collapse or partial collapse of a scaffold over five metres high or erected near water where there could be a risk of drowning after a fall.
- Unintended collision of a train with any vehicle.

**Maintaining records**

**Injuries**

All injuries are to be reported and a record made in the office accident book. These records are to be maintained for at least 3 years.

**Reportable Injuries, Deaths**

Housing Manager are to be informed of all reportable injuries and the accident form completed. The manager/ Housing Manager are to complete report form (F2508) and forward to the enforcing authority. A copy of the completed form is to be maintained on file by the Competent Person.

**Disease**

Notification of work-related diseases are to be maintained on file by the Competent Person. Housing Manager are to complete report form (F2508A) and forward to the enforcing authority. A copy of the completed form is to be maintained on file by the Competent Person.

**Dangerous Occurrences**

All dangerous occurrences are to be reported to the Housing Manager

The enforcing authority is to be informed and forwarded a report form (F2508) by the Manager. A copy of the completed form is to be maintained on file by the Competent Person.

### **Forms**

Copies of the following forms are attached for information:  
Millat sickness notification memorandum  
Report form (F2508) and (F2508A) which is on the reverse

### **Housing Manager are as follows**

**Anand Sivanandam                  Housing Officer**

**M.Islam                                  Housing Manager**

### **Enforcing Authority**

#### **Environmental Health Departments**

London Borough of Merton  
Civic Centre  
London Road  
Morden  
SM4 5DX

London Borough of Sutton  
Civic Offices  
St. Nicholas Way  
Sutton  
SM1 1EA

Royal Borough of Kingston Upon Thames  
Guildhall  
High Street  
Kingston upon Thames  
KT1 1EU

## **23. Responsibilities**

### **Management Responsibilities**

To ensure the prevention of ill health and the avoidance of accidents, and the promotion of safe and healthy workplaces, the following responsibilities have been established.

## Board of Management and the Housing Manager

Overall responsibility for health and safety within Millat, and for the policy Statement and the Manual (including regular reviews of it), rests with the Board of Management and the Housing Manager. Implementation of the policy is the responsibility of the Manager within each workplace. In addition, the 'Competent person' has the particular duty of overseeing health and safety issues and is the designated person responsible for health and safety. The existence of this health and safety role does not remove individual Housing Manager' responsibility for health and safety within their particular workplaces.

### **All Housing Manager will be responsible for**

Providing and maintaining a safe place of work, equipment and safe working practices through regular inspection of the workplace.

Undertaking an audit of the workplace and job undertaken by a disabled member of staff (as defined by the Disability Discrimination Act 1995) to ensure that there is no risk to his/her health and safety nor any risk to the health and safety of other staff; providing appropriate equipment to ensure the disabled member of staff's health and safety and to make reasonable alterations to that person's working environment or location in order to overcome the practical effects of the disability.

Promoting discussion with employees with a view to updating and reviewing systems and methods of work to improve safety standards.

Complying with all statutory provisions and Millat rules concerning safety and fire in the workplace.

Providing adequate information, instruction and training to employees and ensuring that safety standards are maintained.

Ensuring that protective clothing and equipment is available for use, adequate for the working conditions, and that it is being used correctly and when necessary.

Investigating and reporting on the circumstances of each and every accident or incident, whether or not the occurrence has involved injury to persons. Information so obtained must be used in the prevention of further incidents and thus assist in prevention of accidents at the workplace.

Monitoring the Policy's implementation and setting targets or objectives where appropriate.

Reporting to the Housing Manager on areas of weakness in the policy and/or its implementation.

Ensuring that relevant resources are made available to enable the policy to be implemented.

Ensuring that the operations under their control are, as far as is reasonably practicable, conducted without detriment to the health and safety of employees or others who may be affected by their activities.

Ensuring that their area of responsibility is subject to risk assessment, regular inspections and audits

Ensuring that all accidents, incidents and near misses, within their area of responsibility, are reported, reviewing all such reports and ensuring that full investigation is carried out and appropriate remedial action taken, where necessary.

### **Employees are Responsible for**

All employees have the duty under HASAW to take care of their own health and safety, and that of other employees and visitors to Millat's premises, and to co-operate with the safety provisions which are laid down by the organisation. Failure to do so may be an offence under the Act and may also lead to internal disciplinary action, which may include dismissal. Co-operation includes abiding by safety rules and procedures, reporting accidents, near misses and hazardous situations, using appropriate safety devices on machinery and equipment, and wearing any protective clothing or equipment which may be necessary for some tasks.

All employees are encouraged to discuss freely any practicable suggestions they may have for the improvement of safety in their places of work and to notify such views and ideas to the Housing Manager or the 'Competent person'. Any member of staff who has a grievance concerning a health and safety issue should raise it with their Housing Manager, who will determine the appropriate action within ten days (and more urgently where necessary). If the member of staff remains aggrieved by the Housing Manager's response (s) he should invoke Millat's Grievance procedure.

All employees will be responsible for:

Working always with safety in mind and abiding by the safety rules and procedures to include those detailed in the relevant procedure manual.

Reporting to the Housing Manager all accidents or incidents, whether or not they have led to persons being injured or damage to property, and to co-operate in the investigation of all such occurrences.

Maintaining a high regard for your own actions at work in order to prevent accidents or injuries to others as a result of any action or inactivity on your part.

Refraining from doing anything which constitutes a danger to themselves or others.

Being responsible for good housekeeping in areas in which they are working.

## **24. Risk assessments**

### **Background**

The Management of Health and Safety at Work Regulations 1992 places a duty on employers to carry out assessments of risks and introduce all necessary controls.

**The assessments of risks should:**

Identify the significant risks in the workplace  
Look at the potential to cause harm  
To ensure specific acts or regulations are complied with  
Remove or control the risks, assess the control measured and risk  
Review and ensure that all aspects of the workplace are reassessed.

**Assessment**

The Health and Safety Executive Guide '5 Steps to Risk Assessment' will be used by the Association as a model during the assessment of risks and ensuring adequate controls are in place or established. (See appendix A)

**Assessment Involves**

Looking for the hazards

Some areas may already be assessed e.g., COSHH, Fire Precautions (Workplace) Regulations 1997, Manual handling.

Potential to cause harm

Looking at the potential to cause harm and those that might be harmed. Some may be more vulnerable than others e.g., people sharing workplace, members of public, inexperienced staff, lone workers and those with disabilities

Evaluation of Risks

Evaluation of the risks arising from the hazards and deciding whether existing precautions are adequate or if more should be done.

Consideration must be given to removing the hazard if possible.

The Society has highlighted the following operations that may be hazardous but the assessment should not be limited to them only.

- Cleaning and moving of Paladin bins and storage areas.
- Cleaning and working of stairways
- Cleaning and repairs to windows
- Gardening
- Clearing of void flats
- Decorating using staging and ladders
- Service and repairs to drains, sewers and guttering
- Use of electrical equipment

Recording the assessment

It is necessary to record the assessment noting hazards that have significant risks to cause harm. Who might be harmed along with control measures, additional controls required and when the next assessment will be undertaken, should also be noted.

## **Reviewing Assessments**

Millat will undertake regular reviews of the risk assessment at least once every five years.

Risk Assessments for lone workers are to be undertaken each year

Risk Assessment are to be undertaken before the introduction of new equipment, changes in working practises including manual handling and substances which may be hazardous.

## **Responsibilities**

Housing Manager are responsible for:

- Ensuring that a risk assessment has been undertaken
- Ensuring that all persons under their control are aware of, understand and comply with these guidelines
- Ensuring that risk assessments are review at least every five years and every year in respect of lone workers
- Ensuring that a risk assessment has been undertaken prior to the introduction of new equipment; changes in working practises including manual handling and substances which may be hazardous.

All employees are required to:

- Ensure that a risk assessment has been undertaken prior to undertaking the task
- Comply with the relevant parts of these guidelines and the controls that have been part in place to protect them and others
- Report to their manager any circumstances which they consider may require additional controls to be introduced to reduce the risk or the need of manual handling.
- Report to their manager any incidents which occur, whether or not any personal injury has occurred

## **Recording Assessments and Reviews**

Copies of assessments, controls and additional controls are to be maintained on the maintenance manual for each office or scheme.

The Manager is to ensure that records of either new or review of existing risks are copied to the Chair.

## **Controls**

Staff should be regularly reminded by their Housing Manager that the control measures have been introduced to reduce or remove the risks of harm to them and/or others.

Housing Manager is to ensure through regular monitoring that controls are being adhered to.

A record of monitoring is to be maintained by Housing Manager.

## **25. Smoking at work**

Millat has a policy of "no smoking" in all parts of its offices and in all its various internal common parts on each scheme. From 1<sup>st</sup> July 2007 it is illegal to smoke in any indoor public areas including offices and schemes

Smoking constitutes a fire risk and is a health hazard, both for active smokers and because of passive effects. Failure to observe the no-smoking restriction will be treated as a disciplinary offence.

## **26. Stress-related illness**

Under the Health and safety at work Act 1974 Millat has a general duty to ensure, as far as is reasonably practicable, the health of its employees at work. This includes taking steps to make sure that employees do not suffer stress-related illness as a result of their work.

Similarly, Millat must take account of the risk of stress-related ill health to meet its legal obligations under the Management of health and safety at work regulation 1999.

Millat is fully committed to deal with occupational stress issues, to undertake assessments, to apply the principles of prevention, to undertake training as a means of preventing ill health of its employees as a result of work-related stress.

### **Risk assessment**

Undertaking a risk assessment for work-related stress is more complicated than for a physical hazard but involves the same basic principles and process.

Millat will undertake risk assessments

The process of assessment will.

- Identify the hazards
- Decide who might be harmed and how

- Evaluate the risk by
  - Identifying what action is already being taken
  - Deciding whether it is enough
  - Deciding what more needs to be done
- Record the significant findings of the assessment
- Review the assessment at appropriate intervals

Millat will consider factors like the following when identify the hazard while undertaking a risk assessment;

- The culture of Millat and how it approaches work-related stress
- Demands placed on employees, such as work loads, physical hazards
- The level of control the employee has over the way they work
- Relationships within the organisation, like bullying and harassment
  - How organisational change is managed and communicated in the organisation
  - Issues of support and training
  - Factors unique to the individual

Millat will consider factors like the following when deciding what action will be taken to reduce or prevent stress-related illness;

- The acceptance that stress is a potential risk
- Reviewing current controls for the management of the risk
- The introduction of good management practices
- The management of change
- The recognition of the individual
- Training including interpersonal skills, time management etc.
- The individual's ability and the matching of a job
- The level of control by the individual over their job
- The review of work loads and target setting
- Providing variety of tasks, enriching the job
- Giving warning of urgent or important jobs
- Aid in prioritising tasks and cutting out unnecessary work
- Review scope for flexible work schedules (e.g., flexible working, hours, home working)
- Introduction of clear objectives, good communication and close management involvement, particularly during periods of change
- Providing opportunities for staff to contribute ideas, especially in planning and organising jobs

Millat will record the significant findings of the assessment and share them with the employee. Millat will implement the proposed / agreed strategy, monitor and evaluate as part of its stress management programme. The evaluation or review of the assessment may highlight the need for further action.

## **Responsibilities**



Housing Manager are responsible for:

- Ensuring that a risk assessment has been undertaken
- Ensuring that all persons under their control are supported
- Ensuring that risk assessments are reviewed as appropriate
- Developing the environment so that persons under their control can talk at early stages if they feel they cannot cope
- Ensuring sufficient resources to do the work are available. If insufficient, help them prioritise or renegotiate 'deadlines'
- Ensuring that workloads are covered during absences
- Ensuring that training is provided

All employees are required to:

- Discuss their concerns with their manager or another manager at an early stage
- Work with their manager and / or others on the agreed strategy

### **Recording Assessments and Reviews**

Copies of assessments, strategy / controls and additional controls are to be maintained, these will be protected under the data protection act

### **Useful contacts / sources of information**

Tackling work-related stress

HSE Information Services  
Caerphilly Business Park  
Caerphilly  
CF83 3GG

Advice on counselling and stress management is available from

British Association for Counselling and Psychotherapy  
[www.counselling.co.uk](http://www.counselling.co.uk)

International Stress Management Association, Division of Psychology, South Bank University, 103 Borough Road, London SE1 0AA

Information on the work-life balance contact

Work-life Balance Team, Department of Education and Employment, Level 1, Park Gate,  
21 Tothill Street, London SW1H 9LL

[www.DFEE.gov.uk/work-lifebalance](http://www.DFEE.gov.uk/work-lifebalance)

## **27. The control of Hazardous substances – COSHH**

The Implementation COSHH 1988 (Control of substances hazardous to health)

### **Background**

Complying with COSHH involves:

- Assessing the risks to health arising from working.
- Deciding what precautions are needed.
- Preventing or controlling the risks.
- Ensuring that controls are used and maintained properly
- Monitoring exposure of workers to hazardous substances, carrying out appropriate health surveillance where necessary.
- Informing, instructing and training.

Employees must not undertake any work, which would expose them or others to hazardous substances unless an assessment of both the risks and the necessary precautions has been undertaken.

The risk must be judged correctly in order that the appropriate precautions are taken.

### **Assessment and reviewing the assessment**

This is an essential requirement and needs to be tackled step by step;

Identifying the hazards

Weighing up the risks arising from them

Deciding what further action you need to take if the risks are significant

Employees or the employer must not introduce any new substances without prior assessment of the risks and precaution necessary.

Employees are to be provided with clear instructions in the use and precautions necessary when using substances that may be hazardous to health.

Unless the assessment is so simple that it can easily be recalled and the conclusions explained at any time, it should put it in writing. Include sufficient information to show how decisions about risks and precautions were arrived at. It should be made clear to employees and others what parts they have to play in the precautions.

Assessments should be reviewed regularly, at not less than five yearly intervals. Where there has been a significant change in the work the assessment should be reviewed

The Housing Manager is to ensure that a comprehensive list of substances, risks and precautions are maintained.

The Housing Manager is to ensure that within their department that the procedures are followed.

## **Hazards**

What is a substance hazardous to health?

For the purposes of COSHH, substances hazardous to health include:

- Substances or preparations listed as very toxic, harmful, irritant or corrosive
- Substances with occupational exposure limits
- Harmful micro-organisms (this hazard is unlikely at Millat)
- Dusts of any kind in substantial concentrations
- Any other substances creating comparable hazards to people's health such as pesticides and other chemicals used on farms. (This hazard is unlikely at Millat)

What hazardous substances are present?

The assessment must check for hazardous substances, which are:

- Brought into the workplace to be used, worked on, or stored
- Given off as fumes or vapours, or likely to leak or be spilled, during any process or work activity
- Produced at the end of any work or process, as finished products, waste or residues.

How can hazardous substances be identified?

- For substances brought in the workplace; check the safety information your supplier is required by law to include on labels and data sheets. But assessment for COSHH requires more than just reproducing this information – you must draw conclusions from it that are relevant to the way you see it in your workplace.
- Use your existing knowledge – of the work you do, of current best practice, and of any work-related health problems in your workplace.

- Ask your trade union and other employers in the same business for their experience and advice.
- Check whether the substance is mentioned in the COSHH Regulations or schedules or in other HSE guidance such as EH40.
- Check in Part A1 of HSE publications 'Information approved for the classification, packaging and labelling of dangerous substances.'
- Check any other available trade literature or documentation.

## **The risks**

Are there any significant risks from hazardous substances?

Could any hazardous substances in your workplace present a real risk to people's health – now, in the future, or in a foreseeable emergency? Look at:

- Where and how they are used, handled, generated, released etc. (Identify, places e.g., Storage areas)
- Whether their form changes (e.g., Solids reduced to dusts by machining, vapour given off)
- Whether such exposure would involve substances being breathed in, swallowed (e.g., following contamination of fingers etc) or absorbed through the skin.
- What measures are currently taken to prevent or control exposure and to check on the effectiveness and use of those measures?
- Whether it is reasonably foreseeable that accidental leakage, spillage or release could occur – e.g., through breakdown of the plant or controls, or through operator error.
- Do not forget activities such as cleaning and maintenance – many accidents occur in non-production work.

Reach conclusions about the real risks to people's health from the information you can gather and your knowledge of the potential of the substance for causing harm. Even if you conclude there are no significant risks, you are to record this information to back up your decision.

## **What further action must be taken?**

If you have concluded that there is no likelihood of risk of health, the assessment is complete, and no further action is needed (until you renew the assessment). If you conclude that there are risks to health, you must decide what else you need to do to comply with the Regulations.

## **Prevention**

If it is reasonably practicable, you should prevent exposure by:

- Changing the process or activity so that the hazardous substance is not required or generated, or
- Replacing it with a safer alternative, or
- Using it in a safer form, for example pellets instead of powder.

Department managers should ensure that where possible substances and processes that can be replaced with others that present no or reduced risks, the substance or process should be replaced.

## **Control**

If prevention is not reasonably practical, you must adequately control exposure by a combination of the following:

- Total enclosure of the process
- Partial enclosure and extraction equipment
- General Ventilation
- Using systems of works and handling procedures, which minimise the chances of spills, leaks and other escape of hazardous materials.

If, and only if, you cannot adequately control exposure by any combination of the measures above, you should also provide protective clothing.

Control is usually considered adequate, if most people would suffer no adverse health effects of exposure to the substance on the same day or at a later date. But for certain substances where the risk to health is through inhalation, occupational exposure limited has been set. There are two kinds, maximum exposure limits (MELs) and occupational exposure standards (OESs). See HSE guidance booklet.

The regulation requires employees to make proper use of control measures and to report defects.

## **Maintenance, examination and testing of control measures**

COSHH places specific duties on employers to ensure that controls are kept in efficient working order and good repair. Engineering controls and respiratory equipment has to be examined and, where appropriate, tested at suitable intervals, with set periods laid

down for local exhaust ventilation equipment. You must keep suitable records of all such actions you take.

Housing Manager is to ensure that their department staff use controls and that all appropriate records are maintained.

### **Monitoring exposure**

COSHH requires that the exposure of workers to hazardous substances should be monitored in certain cases, for example.

- Where there could be serious risks to health if control measures were to fail or deteriorate.
- If you cannot be sure that exposure limits are not being exceeded
- Where you cannot be sure that particular control measures are working properly

You should keep a record of any exposure monitoring you carry out.

### **Health surveillance**

Health surveillance is required under COSHH:

- Where an employee is engaged in one of the processes listed in Schedule 5 of COSHH for example manufacture of vinyl chloride monomer (VCM), and is likely to receive significant exposure to the substance involved:
- Where employees are exposed to a substance linked to a particular disease or adverse health effect and there is a reasonable likelihood under the conditions of the work of the disease or effect occurring and it is possible to detect the disease or adverse health effect.

This might involve examination by a doctor or trained nurse, trained staff could for example, check employee's skin for dermatitis, or ask questions about breathing difficulties where work involved substances known to cause asthma. IDS will keep a simple health record of any health surveillance carried out, comprising mainly basic personnel details. In some cases this may be the only form of health surveillance that is required.

The COSHH (Amendment Regulations 1992 required health records to be kept for 40 years, instead of the previously required 30 years.

### **Inform, instruct and train**

COSHH requires an employer to inform, instruct and train employees about;

- The nature of the substances they work with and the risks created by exposure to those substances
- The precautions they should take.

Information and instruction will be given on;

- Control measures, their purpose and how to use them
- How to use personal protective equipment (PPE) and clothing provided
- Results of any exposure monitoring and health surveillance (without giving people's names)
- Emergency procedures

These are very important duties that sometimes get overlooked. There is no point assessing the risks yourself without making sure your colleagues understand them too. Control measures can only be effective if employees know how to use them properly.

Housing Manager is to review training requirements as part of the Association's one to one meetings held with every employee.

## **28. Training**

Millat will ensure, within its training programme, that all Housing Manager are aware of their health and safety responsibilities; those Housing Manager are in turn responsible for ensuring the instruction of all staff in their workplaces in safe systems of work, proper use of equipment and substances, use of any required protective measures, and on general safety in the working environment.

Induction training of new employees will also contain a briefing on health and safety provisions.

Employees are to bring to the attention of their Housing Manager areas where additional health and safety training is required. Employees are not to undertake tasks that they have not been trained to undertake safely

## **29. Using ladders**

Before using a ladder

Check that ladders or steps to be used are not damaged, buckled or warped, no rungs are cracked or missing, and any safety feet are not missing, report defects to your Housing Manager. Do not use defective ladders or steps.

Ensure that ladders or steps are suitable for your intended use, i.e., correct length/height. Do not use ladders higher than nine metres.

Ensure that ladders stand on a firm and level surface. Ladders over three metres or used as a way to and from a workplace must be secured from falling. This will normally be by fixing at the top and base. If the ladder cannot be fixed a second person must foot the ladder while it is being used. This also applies while the ladder is being used. This also applies while the ladder is being fixed.

Check that footwear is free from mud and grass, which could be transferred to the ladder rungs.

Ensure when footing a ladder, a safety helmet is worn. Pay close attention to the work in hand.

Use hoists, ropes or other forms of lifting devices for heavy items, do not carry them when using a ladder.

Ensure ladders extend at least one metre beyond the highest point of landing when gaining access to roofs or platform.

Take care when erecting ladders around or near breakable materials, i.e., plastic guttering, windows etc.

Ensure ladders are set at approximately 75 degrees from horizontal, i.e., one metre out from building for every four metres in height.

## **DONTS**

- Use Defective Ladders or Steps
- Overreach when working from a ladder
- Carry heavy materials up or down ladders
- Use boxes etc to prop up ladders to gain extra height
- Use ladders, having standoffs fitted to gain access to roofs or platforms
- Stand on platform when using steps

## **Check aluminium ladders for**

- Missing, loose or defective rungs.
- Insecure or missing tie rods
- Defective buckles or distorted stiles
- Defective ropes
- Missing fastenings, guides or latching hooks
- Makeshift repairs



- Corrosion
- Anti-slip blocks on stile ends (if fitted)

### **Check timber ladders and steps for**

- Missing, loose or defective rungs/or treads
- Rungs or treads supported solely on nails, spiked or similar.
- Insecure or missing rods to ladders (these should be fitted immediately below intermediate rungs, at points not more than nine rungs apart).
- Defective stiles or side members.
- Defective ropes
- Excessive warping
- Missing fastening, guides or latching hooks.
- Makeshift repairs

### **Revision in respect of 'The use of work equipment directive 2001/45/EC'**

It is expected that the government will approve changes to the Health and Safety regulation by mid-2004.

It is expected that the regulation and guidance will require proper justification for the use of ladders and steps, across a range of activities (use of equipment whilst on ladders / steps).

## **30. Violence at work**

### **Introduction**

Violence at work is defined as an incident in which an employee is abused, threatened or assaulted by a tenant, other resident, colleague or a member of the public in circumstances arising out of the course of his or her employment, within or out of working hours. This may include sexual or racial harassment. NOTE: racial harassment is covered in a separate policy/procedure.

Millat views violence towards its staff very seriously, and incidents of violence by staff against other staff or Millat's tenants are covered by the existing disciplinary procedure. This policy relates only to those cases where staff suffer violence from tenants or members of the public.

**N.B.** Also refer to the section on 'Lone working'.

## **Policy statement**

Millat recognises and accepts its responsibility to provide;

- accessible services for its tenants on its estates and at the office, and reasonable access to the relevant staff and,
- provide a safe system of work for all its staff.
- training for staff where required.

Millat recognises that women may be at particular risk from some tenants and members of the public and will take all practicable measures to ensure a safe and secure working environment.

Millat will ensure that reasonable safety measures will be taken both in the design and facilities of buildings and in work procedures and practices.

Millat recognises that Housing Manager and staff who are expected to handle disturbances may face additional psychological and stressful burdens. In consequence Millat will endeavour to provide appropriate guidance and training in handling aggression or violent behaviour to:

- All staff who regularly meet or interview tenants or members of the public.
- Housing Manager who are expected to provide support service to staff who deal with the public.
- Staff will be expected to attend courses as required.

Millat will create a supportive environment for staff in general and provide direct support for victims in particular wherever possible and appropriate. Millat will consider taking appropriate legal action itself depending on the situation or may pay the costs of the victim who chooses to prosecute the assailant(s).

Millat will ensure that at least two staff are working in the office at all times for the safe working of this policy.

The Housing Manager shall encourage employees to report all violent incidents. Millat expects all its staff to co-operate fully in operating the policy and the accompanying procedure, failure to do so may result in action under the disciplinary policy.

## **Implementation and Training**

The Housing Manager is responsible for the implementation and training of all aspects of this policy.

All staff will receive a copy of this policy as part of the personnel handbook.

Violence at work will be covered within all induction programmes.

Housing Manager are responsible for ensuring that their staff adhere to this policy and do not take any unnecessary risks.

## **Summary and procedures**

It is essential that you read these procedures because they spell out how to avoid threatened or actual assault and what you should do if it happens to you or another member of staff. You have a duty to yourself and others to make yourself familiar with the procedures or you may endanger the health and safety of yourself or other people.

The keys points are:

- Read these procedures thoroughly now.
- Make sure you have an identity card (where appropriate).
- Make sure you know where the alarm buttons are in the office and what should happen if used.
- Check tenant's files before visiting. Do not visit alone if you know the situation is potentially hazardous.
- If you are assaulted, obtaining medical assistance is your first priority.
- If you are assaulted, telephone the office or get someone else to telephone.
- If you receive a call from an assaulted member of staff, check location and telephone number and alert the Housing Manager of Housing Services or other senior staff member IMMEDIATELY. They will take over responsibility.
- Empty properties should be visited in pairs whenever possible and only in pairs outside daylight hours.

## **Guidelines to staff dealing with actual or threatened assault**

### **Advance security and prevention**

All staff should carry an identity card.

The office counter is designed to protect reception staff. The office should be always staffed by a minimum of two people. Estate based staff working on their own should have arrangements agreed in conjunction with their Area Housing Manager.

Office staff must complete the diary in reception when they leave the office by writing where they are going and when they expect to return. They should also advise the Estate Manager / Staff upon arrival and on leaving. Staff must also notify reception of their return. This is also important in having to deal with the possible evacuation of the

building as a result of fire and calling a roll of staff.

If staff do not plan to return to the office that day and know that they may be going into a potentially hazardous situation, i.e., meeting a threatening tenant or surveying a dangerous structure, they should arrange to phone into the office before close of business to reassure the receptionist that they are safe.

If such a call is expected but not received, the receptionist should report the matter to the Chair or the Housing Manager who will decide on further action. If deemed necessary other members of staff may be organised to look for the missing person.

- The file of any tenant where there has been an incident of actual or threatened assault, or where a referral agency has advised that there is potential violence will be clearly marked with a red sticker. A note of the incident should be stapled inside the front cover of the file with the date of the incident clearly marked
- Empty properties should be visited in pairs wherever possible and certainly in pairs outside daylight hours. Staff are responsible for taking necessary safety equipment e.g., torches and safety helmets which Millat will provide.
- Staff delivering or collecting money from the bank should do so with discretion and not advertise the fact that they are carrying money. In all cases, STAFF SHOULD HAND OVER MONEY IF THREATENED.
- Staff who is called out as key holders to office premises by the Police, outside office hours should not enter the premises alone. If necessary, staff should first go to the local police station and ask to be accompanied.
- Potentially dangerous tenants should preferably be asked to visit the office rather than visit their home.

### **Action to be taken in all cases of assault**

The health and well being of the staff member is the primary consideration, and obtaining medical assistance if necessary should be the first priority.

Telephone the office if possible and speak to the Chair or the Housing Manager or ask someone to make a call. Recipients of the call should note location and nature of the incident, whether emergency services have been alerted and exact location of telephone box or phone.

The person accepting the call then assumes responsibility for following procedures.

The responsible person should go straight to the person who has been assaulted, or if this is not possible arrange for someone else to go. If the responsible person leaves the office to go to the person assaulted, he/she must ensure another member of staff at the office has full details of the incident.

All cases must be reported to the police immediately. In certain circumstances however, for example allege rape, it should be the victim's decision whether the matter is reported to the police.

The victim should record the incident, if possible, in writing, as soon as is practicable or interviewed where a report will be made on behalf of the victim.

This report, together with one from the Housing Manager should be passed onto the Chair and, where appropriate, placed on the tenant's file.

The Housing Manager is responsible for following up as appropriate with the member of staff, tenant, member of the public etc, including contacting support groups; counselling etc paid for by Millat

It is expected that paid sick leave is taken, subject to certification by a doctor or counsellor, until the staff member is able to return to work. This should not be counted against accrual of sick leave as per sick leave policy.

Should the incident occur in the office the Housing Manager or the Housing Officer should be called immediately to investigate.

Members of staff who feel they are sexually harassed by any person with whom they deal on behalf of Millat must feel free to have no further contact with that person and must report the matter to the Housing Manager or the Chair so that alternative arrangements can be made.

## **Threats**

The threat of assault is deemed as any verbal abuse or threat of violence if staff feels threatened or at risk.

Staff who find that they cannot handle threatening, abusive or difficult telephone calls should feel free to transfer the call to a more senior member of staff, or to terminate the call, and inform a senior member of staff of the termination.

Where a threat is made in person by a tenant, squatter or any person when staff visits the property, the recommended course of action is retreat. The staff member should return to the office and report to his/her manager. Further visits should always be made in pairs.

If violence is threatened in the office the staff member should withdraw from the interview and seek assistance of a more senior member. The person who has made the threat should be asked firmly to leave the office by the senior member of staff in the presence of another staff member. If they consistently fail to do so the police may be called.

In some instances, it may be necessary to report a threatened assault to the police, but this action will normally follow discussions between the Housing Manager and the staff member(s) involved.

All incidents of threatened assault should be recorded in writing and a report passed to the Chair. If a threat comes from a tenant a copy of the report should be placed on the tenants file and the file marked accordingly.

### **Legal remedies**

If any visitor to Millat's offices threatens violence the police may be called, especially if a visitor refuses to leave the premises.

If a staff member wishes to bring a prosecution for an assault suffered during the course of his/her duties Millat may pay legal expenses, particularly if the prosecution is brought primarily to prevent further disturbances and protect other employees.

Any member of staff suffering injury as a result of assault should consider applying for compensation under the Criminal Injuries Compensation Scheme, details of which will be held by the Chair

If a staff member is prosecuted for assault Millat would have to consider whether the particular circumstances of the case justified Millata paying the legal cost of defence. It recognises that in some instances it may well be appropriate.

### **Investigation and reporting form**

#### **Perpetrators Name/s**

.....  
.....

#### **Address**

.....  
.....

### **INCIDENT REPORT**

Date of Incident	Incident	Staff member / Person involved	Action taken

## **31. Welfare**

**Millat** is interested in the general welfare of its employees and will assist with problems wherever feasible. Members of staff who feel they need welfare assistance should feel free to discuss problems in private with the Housing Manager.