



J49 LTD

DATA PROTECTION POLICY

Prepared by:

ADMIN

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Department:

ADMIN



Introduction

At J49, we are committed to ensuring the privacy and security of personal data entrusted to us by our residents and stakeholders. This Data Protection Policy outlines our approach to data protection in compliance with the Data Protection Act (2018) and other relevant regulations.

At J49 Ltd we need to process information about employees, organisations and individuals who use our services. When we process information, we need to keep to the terms of the Data Protection Act 1998. In particular, we need to make sure that we process information in line with eight principles of data protection described in the Act (later in this policy)

The Data Protection Act sets limits on the way we collect, store and use information. The Act controls how:

- We file information
- how we access information
- how we pass information on to other organisations and individuals; and
- how and when we destroy information we are storing.

The Act says that people have a right to access any information that we hold about them. This includes company employees/volunteers and people who use our services. The Act says that we have to respond to requests for access to information within 40 calendar days. The Act says that organisations that process information need to register with the Information Commissioner's Office. There are exceptions to this rule for some not-for-profit organisations. Under these exceptions the company does not have to register with the Information Commissioner

The Company Secretary will deal with day-to-day data protection issues. The company Directors have overall responsibility for ensuring that the company works in line with the Data Protection Act

The company Directors, staff and any others who process personal information on behalf of the company must comply with the principles of the Act.

Company's responsibilities

- The company wants to protect the right of individuals to privacy. We will respect the privacy of individuals when processing personal information.
- We will take appropriate measures to make sure that the data we hold is stored securely
- The company Directors have overall responsibility for making sure that the company meets the terms of the Data Protection Act
- The company management/staff have a responsibility to make sure that staff process information in line with the terms of the Act.

Employees/volunteers responsibilities

- Employees/volunteers are responsible for the security of the information they process
- Employees/volunteers must not pass on information to anyone who is not entitled to it
- Employees/volunteers should make sure that any information they give to the company about their employment is accurate and up to date.

Right of access

The company employees/volunteers and people who use our services have the right to access personal information the company holds about them, whether in electronic or paper form

People who want to access information held about them should contact the company information and communication worker

More information about individuals' right of access is available in Appendix 2

The 8 Principles of Data Protection

The Data Protection Act states that anyone who processes personal information must comply with eight principles. These state that information must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than is necessary
- Processed in line with individuals' rights
- Secure
- Not transferred to other countries without adequate protection

Being open about how we will use information that individuals/organisations give us
The Data Protection Act says that we need to explain to people how we will use the personal information they give us. The company also desires to be clear about how we will use organisational information supplied to us.

The following statement is a general explanation of how the company will use information. This statement should be included on all forms, surveys, questionnaires and other documents where we ask for personal information.

If we are collecting information for a purpose that isn't included in this statement, we should amend the statement to make our full purpose clear.

How we use the information you give us

Information you give the company will be used by us to tell you about the company services, events and opportunities and to give you information on relevant issues. The company will communicate with you by telephone, letter, email, or in any other reasonable way. You can ask for a copy of the information we hold about you and your organisation, and if the information isn't accurate, you can ask us to correct it. If you do not want to receive letters, emails and telephone calls from us in the future, please tell us in writing.

The company may pass on details of your organisation's postal address to other voluntary and community organisations, or to local statutory organisations. We will never pass your contact details on to salespeople, or to private organisations. If you do not want us to pass on your organisation's postal address, please let us know in writing.

If you have any questions about how the company will use information about your organisation, please phone.

Dealing with disclosure

The Data Protection Act gives people rights to access personal information that organisations hold about them. This guidance explains what rights people have, and what responsibilities are.

People have the right to know if we process (collect, store and use) their personal information.

People can ask us to tell them:

- What kinds of personal information we process
- How we use personal information
- Who we pass personal information on to, and in what circumstances

People can also ask for a copy of the information records we hold about them, and for us to explain where we got our information.

If people want to get a copy of the information records we hold about them, they need to ask us in writing. We have to respond to written requests within 40 days.

An individual only has the right to see personal information we hold about them personally – no one can ask to see another person's information. If someone asks for a copy of their information record we need to check that they are the person the record is about.

In some situations, by giving out information about one person, we may also give out information that makes other people personally identifiable. For example, our training records might show the names of everyone who attended a training course on a particular date. The Data Protection Act (Section 7, sub-sections 4-7) has special rules to say what should happen in these situations and we need to work in line with these rules.

People can also ask in writing to be removed from our records, or to say how and when we can use the information we hold about them. For example, someone might choose not to receive emails from us, but might still want to receive the company newsletter. We need to deal with requests like this within 21 days.

In general, all requests relating to the use, storing or deleting of records should be made in writing to the Company Secretary.

Passing on information

The company statement how we will use the information you give us explains that the company will, in some circumstances, pass on contact information for organisations and individuals:

Information you give the company will be used by us to tell you about the company services, events and opportunities and to give you information on relevant issues. The company will communicate with you by telephone, letter, email, or in any other reasonable way. You can ask for a copy of the information we hold about you and your organisation, and if the information isn't accurate, you can ask us to correct it. If you do not want to receive letters, emails and telephone calls from us in the future, please tell us in writing.

Your organisation's name and the contact details you give us will be added to a directory of voluntary and community groups in Westminster. This directory is accessible to the public, and to other voluntary organisations. If you do not want your organisation to be included in the directory, please tell us in writing.

The company may pass on details of your organisation's postal address to other voluntary and community organisations, or to local statutory organisations. We will never pass your contact details on to salespeople, or to private organisations. If you do not want us to pass on your organisation's postal address, please let us know in writing.

General guidelines:

- The company may pass contact information on to agents employed by the company to carry out a particular task (for example, asking volunteers to contact people on our database by telephone)
- Information listed on the online directory is already considered to be in the public domain. Contact details listed on the online directory may be passed on individually, but not collectively
- The company may pass contact information for organisations, individually or collectively, to members of the public, to public sector organisations, and to voluntary sector organisations
- The company may not pass on contact information for organisations, individually or collectively, to private sector organisations wishing to sell services or goods
- The company may not pass on information about an individuals' use of the company services, without permission from that individual.

General principles for Data

1. Definitions:

- Personal Data: Any information relating to an identified or identifiable individual.
- Data Controller: J49, as the organisation determining the purposes and means of processing personal data.
- Data Processor: Any entity processing personal data on behalf of J49.

2. Data Protection Principles:

- Lawfulness, fairness, and transparency.
- Purpose limitation.
- Data minimisation.
- Accuracy.
- Storage limitation.
- Integrity and confidentiality.
- Accountability.

3. Responsibilities:

- Data Protection Officer (DPO): Housing Community Manager is appointed as the DPO and is responsible for overseeing compliance with data protection laws and this policy.
- Individual Responsibility: All employees and contractors are responsible for ensuring that personal data is handled securely and in accordance with this policy.

5. Data Subject Access Rights and Requests:

- Individuals have the right to request access to their personal data held by J49. Such requests should be made in writing to the DPO and will be responded to within the statutory timeframe.

6. Third Party Requests for Information:

- Personal data will only be disclosed to third parties in accordance with applicable laws and with the consent of the data subject, unless otherwise required by law.

7. Data Sharing Protocols:

- Any sharing of personal data with external parties will be governed by a Data Sharing Agreement, detailing the reasons for sharing, nature of information, and how it is to be shared.

8. Breaches of Policy:

- Any breaches of this policy or data breaches must be reported immediately to the Board for investigation and remedial action.

9. Storage and Security:

- Personal data will be stored securely, with access restricted to authorised personnel only. Measures will be in place to prevent unauthorised access, disclosure, alteration, or destruction of data.

10. Data Protection Impact Assessment (DPIA):

- J49 will conduct DPIAs for new processes or systems involving the processing of personal data to assess and mitigate risks to individuals' privacy rights.

11. Retention of Data:

- Personal data will only be retained for as long as necessary for the purposes for which it was collected, in accordance with J49's retention policy and legal requirements.

12. Audits:

- Regular audits of data processing activities will be conducted to ensure compliance with this policy and relevant data protection laws.

13. Privacy Statement:

- A Privacy Statement will be provided to individuals outlining the types of information collected, the purposes for which it is used, their privacy rights, and any sharing of information with third parties.

14. Conclusion:

This Data Protection Policy reflects J49's commitment to protecting personal data and ensuring compliance with data protection laws. All employees and contractors are expected to familiarise themselves with this policy and adhere to its principles and procedures.

Members of the Senior Management Team :

1. Discussing Health & Safety direction, ensuring that pragmatic decisions are reached on issues raised and feeding back to the board and colleagues following meetings
2. Attending meetings and acting as ambassadors for their area of influence, representing all areas of the organisation
3. Preparing for meetings as relevant, progressing actions, and reading information prepared in advance
4. Ensuring issues raised by others are brought to the health & safety panel and ideas are actively encouraged to improve safety management performance and to encourage positive consultation
5. Ensuring colleagues for whom they are responsible, or others who could be affected by matters discussed, are provided with feedback from the meetings and understand exactly how to implement the safety and environmental management system or instructions received
6. Where individuals have raised concerns or wish to have their views heard that this can be openly discussed at these meetings without fear of reprisal
7. Ensuring actions are tracked, meetings are minuted, and the effectiveness of this policy and the company safety management system is monitored
8. Being champions of health & safety performance – leading by good example
9. Actioning issues assigned to them in a timely manner, reporting back to the health & safety panel if issues cannot be resolved
10. Communicating matters raised at the health & safety panel with colleagues and the board.

Chief Executive

The Chief Executive has ultimate responsibility for the operational management of Health & Safety across the association implementing arrangements as directed by the board. They are responsible for ensuring strategy and policy decisions are fully implemented and the senior leadership team are allocated sufficient resources to follow through on expected actions with the right structure in place and clear priorities to enable this to happen.

They will ensure the senior leadership team has the right abilities, knowledge, experience, and forward-thinking aptitude to plan, organise and implement expected standards.

The Chief Executive will escalate matters they cannot resolve, or which require decision to the board. They will also have the same responsibilities as all managers and employees to lead by good example.

Responsible Person

The Senior Project manager is responsible for implementing Health & Safety standards via the relevant internal teams and as part of the senior leadership team. As the responsible person he will chair the Health & Safety panel.

He has responsibilities for ensuring those areas which impact on Health & Safety standards from the management of the portfolio of property and all maintenance/repair responsibilities are fully implemented. The responsible person will also ensure documentation and organisational standards remain high.

Specifically, they are responsible for:

1. Overseeing terms of reference for the Health & Safety panel; ensuring matters raised by the board have been fully discussed
2. Escalating matters which cannot be resolved to the chief executive
3. Providing the board with relevant information from the Health & Safety panel and reporting to them on accident and incident statistics
4. Interpreting lease, management agreements and contractor agreements so responsibilities for Health & Safety are clear and unambiguous
5. Ensuring that J49 has the capability and resources to manage its assets to expected legal standards
6. Ensuring there is adequate resources available to manage property to expected legal standards especially where this requires planned expenditure
7. Ensuring there are high standards in respect of documentation management so information and checks can be undertaken, and arrangements audited
8. Ensuring employees attend training relevant to their roles, as specified within the J49 employment
9. Ensuring employee health and safety has been fully considered, that relevant risk assessments have been undertaken, inductions completed, and resulting controls implemented
10. Undertaking relevant risk assessments on the property portfolio. In relation to general hazards, asbestos, water safety, and emergency/fire arrangements. Meeting standards and frequency of checks based on policy arrangements

11. Ensuring fire and emergency arrangements are known and understood by residents
12. Leading by example, attending relevant training, and wearing PPE where this has been deemed necessary
13. Supporting individuals who do not meet the standards expected via coaching, training, and consultative management, but using disciplinary procedures if required following repeated refusals to comply
14. Only engaging competent contractors in line with the J49 contractor management arrangements
15. Meeting with term contractors on a regular basis to ensure they are working safely, that all expected work standards are being met, and that they are reporting on their arrangements and standards
16. Ensuring that contractors are inducted
17. Ensuring project work is managed to comply with standards contained within the Construction (Design & Management) Regulations
18. Coordinating maintenance & repair activities, ensuring all relevant hazard information has been exchanged for work to be undertaken safely
19. Coordinating the investigation of relevant accidents and incidents where necessary, ensuring these are reported under RIDDOR
20. Liaison with regulators
21. Ensuring competent person support is in place for relevant aspects where in-house expertise is not available, or where additional checks are required to ensure arrangements meet expected standards
22. Monitoring lone workers and recording lone worker checks
23. Ensuring lone working arrangements are being effectively implemented. That relevant contact details are verified before staff meet people and that electronic diaries are being managed
24. Not placing J49 in a position where they could be held legally responsible due to decisions they make, or do not make, especially in relation to financial decisions or priorities.

Housing Community Manager

Housing Compliance Officer is responsible for regular property and housing checks. They will also implement arrangements at each location.

Specifically, housing compliance officer is responsible for:

1. Implementing standards on a property-by-property basis under the direction of the responsible person
 2. Ensuring residents are aware of known site hazards, by providing relevant Health & Safety information and information on what to do in an emergency
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3. Ensuring action plans by property are kept up to date, that the correct responsibilities to implement control measures are assigned, and that progress is communicated and managed
 4. Providing adequate information on the location of asbestos, ensuring an up-to-date hard copy of the asbestos register is available on site, where relevant and electronic information is available to forward to anyone who may come into contact with asbestos accidentally. Maintaining the asbestos management plan for their sites in line with policy arrangements
 5. Maintaining documentation in line with policy especially in relation to recording relevant checks in logbooks on site and electronic filing
 6. Reporting any accidents or incidents in line with this policy especially where it becomes evident there has been an incident involving residents
 7. Ensuring that where work is undertaken which is designated as high risk relevant permission from J49 is issued and all parts of it completed ensuring that site specific risk and method statements have been provided before work is permitted
 8. Attending training when this has been deemed appropriate
 9. Escalating matters to the responsible person if it cannot be resolved or if a hazard is identified that they cannot deal with in isolation
 10. Providing hazard information to visiting contractors and undertaking inductions as instructed. Ensuring that visiting contractors are provided with emergency evacuation information
 11. Ensuring that plant and equipment is maintained and that statutory thorough examinations have been undertaken where necessary
 12. Monitoring standards in line with policy. Ensuring requirements to complete company checklists and property checks are met.
 13. Maintaining “In Case of Emergency” contact numbers for all staff

Residents

Residents are responsible for aspects of their homes as determined by the terms and conditions of their lease. They are responsible for cooperating with reasonable requests from J49 to enable the safe and sustainable maintenance of their property.

Subject to specific license agreements, they are responsible for:

1. Complying with any emergency arrangements or procedures in place. Co-operating with practice fire drills and work to undertake personal emergency evacuation plans for individuals with disabilities
2. Maintaining appliances which are their responsibility
3. Respecting landlord areas that have been deemed to be restricted access, keeping emergency routes clear, and not using plant areas or escape corridors as storage locations
4. Providing access so J49 designated contractors can undertake maintenance/repair
5. Reporting hazards in common parts they maybe aware of.

All Managers & Supervisors

Managers and those with responsibilities to organise the activity of others, are responsible for implementing this policy within their areas of responsibility.

Managers and supervisors must not put J49 or any controlling Directors or colleagues into a position where it/they are at risk of criminal or civil litigation due to their actions or inactions particularly in relation to:

- Consent – being aware of a safety issue and actively agreeing to it, going along with the non-compliance
- Connivance – being aware of what is going on and turning a blind eye, pretending the situation does not exist
- Neglect – actively breaching a legal requirement or obligation – gross negligence

If managers and supervisors are unable to fulfil their personal obligations this must be effectively communicated, and the issue escalated via the management structure until it can be resolved. It is a criminal offence under the Health & Safety at Work Act to put another person(s) or a corporate body into a position where it is not complying with statutory requirements.

Managers and supervisors are responsible for meeting relevant standards contained within the

Anyone working for or on behalf of J49

Employees, contractors, business partners and self-employed workers have varying levels of safety responsibility. The amount of responsibility will depend on their position, the work that they do and the number of people reporting to them.

Those in control of significant projects, who manage other people or who have responsibility for managing change will have the greatest responsibilities. They must ensure that the decisions they make (or the decisions they do not make) are in compliance with the J49 safety policy and arrangements made under it.

Everyone should be aware that failures to comply with statutory or policy health, safety and welfare requirements, or acts of negligence (including misuse of safety related equipment) are liable to be dealt with under the Disciplinary Procedure.

If individuals are unable to fulfil their own obligations this must be reported in writing via the line management structure and the problem escalated until it can be resolved. Issues can also be confidentially reported to the Competent Person. It is a criminal offence under the Health & Safety at Work Act to put another person(s) or the company into a position where it is not complying with statutory requirements that can lead to prosecution.

Any individual actively ignoring safety instructions will be personally responsible for their actions and can be personally prosecuted. As health and safety law is criminal law this could result in a criminal record. Individuals do occasionally get prosecuted.

All individuals have the following responsibilities:

1. To take reasonable care of the health, safety and welfare of themselves and others who may be affected by their acts or omissions, including safeguarding the well-being of all visitors and residents to premises where they are working and to members of the public
2. To make themselves familiar with this policy documentation and relevant arrangements/risk assessments made under them
3. Co-operating fully with superiors and with individuals who have delegated responsibilities to manage Health & Safety arrangements, as required, to secure compliance and ensure that risk assessments can be fully implemented locally
4. Conducting organisation with clients, residents, visitors, contractors, and those that may be affected by decisions made by them in line with J49 Health & Safety values
5. To report any incidents which occur out of or in connection with the organisation that they control, in line with policy on reporting incidents internally (see arrangements)
6. To escalate matters which cannot be resolved in isolation via the line management structure
7. To attend safety training when training needs identify that this is required
8. Participating in, and contributing to, written risk or impact assessments carried out for areas of work that they control or have expertise in
9. To effectively supervise those under their control and ensure that their work has been fully risk assessed
10. To co-operate and follow controls where risk assessments identify that action is required. In relation to the care of and use of personal protective clothing
11. To manage contractors or agency staff directly engaged by them or under their direct control in line with the risk assessment on contractor management
12. Ensuring that where they are required to keep safety records, that this documentation is kept up to date and is available for inspection as and when required

12. Ensuring that where they are required to keep safety records, that this documentation is kept up to date and is available for inspection as and when required

13. To adhere to the lone working systems in operation for their work activity whether this be signing in/out, contacting the office on a regular basis or via other management controls that have been agreed as policy

14. Cooperating with the completion of regular checks if requested to do so

15. Observing any site-specific procedures that may be in place on client sites including those relating to:

- Emergency and fire procedures
- Standards in respect of tidiness and good housekeeping
- Lone working arrangements
- Signing in/out
- Being aware of and complying with controls in respect of on-site hazards including asbestos surveys and site-specific hazard information
- Providing work sheets at the end of their work (if required to do so)
- Recording visits or monitoring within logbooks
- Adhering to high-risk permit arrangements when relevant.

General guidelines for all individuals:

- DO make yourself familiar with emergency and fire procedures whilst at work
- DO take note and follow any specific instructions given to you by others or provided via signage
- DO comply with any local site rules when you are on someone else's premises
- DO make yourself familiar with hazards in your working environment wherever this may be
- DO request information on hazards where you are working at other people's premises, particularly in relation to asbestos and electricity
- DO ensure that your work has been risk assessed and follow relevant controls
- DO use any PPE provided to you (e.g., hard hats, hi-viz. clothing, safety boots etc.)
- DO report unsafe working practices that you have become aware of
- DO report potential slip, trip, and fall hazards e.g., damage to floor surfaces
- DO request assistance if you are unsure of your responsibilities or safety precautions that apply within your work
- DO complete risk assessments if you are asked to do so
- DO comply with monitoring requirements if you work alone.
- DO NOT use electrical or work equipment if it appears to be faulty
- DO NOT overload electrical appliances
- DO NOT repair or use equipment you have not been trained to use or repair
- DO NOT lift or move loads that are clearly too heavy for one person to lift
- DO NOT put yourself at risk by accessing areas that are clearly unsafe
- DO NOT put others at risk by taking them into environments that are clearly unsafe
- DO NOT access high levels or other hazardous environments without carrying out a risk assessment

- DO NOT access fragile surfaces or roofs without appropriate precautions being in place
- DO NOT tamper with fire equipment or other equipment provided to safeguard health and safety
- DO NOT ignore control measures that have been put in place as a result of a risk assessment to protect you.

Office Work & All Employees

Accidents and Incidents

Any accidents, incidents or near misses, however minor, must be internally reported and recorded in the office accident book. The Property Services Manager will ensure all incidents and accidents are recorded here.

Under the Reporting of Diseases and Dangerous Occurrences Regulations (RIDDOR) certain, more serious, accidents must be reported. The responsible person will RIDDOR report and investigate any incidents involving self-employed people, employees, or members of the public as relevant which occur out of or in connection with J49 controlled work.

Contractors remain responsible for RIDDOR reporting incidents under these regulations where their employees suffer injury or ill health at work. All such notifications must also be copied to J49.

If a serious incident occurs this should be reported as soon as possible so a decision can be made regarding RIDDOR reporting.

Where anyone identifies something that they feel could be a hazard to others, particularly in relation to slips, trips and falls, or unsafe working practices by others, this should be reported to the responsible person.

For further information including more detailed guidance on RIDDOR [click here](#).

Alcohol and Drugs

Everyone is responsible for ensuring they do not work under the influence of alcohol or non-prescribed drugs. Individuals who must take prescribed drugs which could affect their ability to work safely

must have their work individually risk assessed. They should inform their line manager and if necessary, their work will be subject to a personal risk assessment. Employees must cooperate with any relevant controls which may be implemented to ensure that they are not a danger to themselves or to others.

Asbestos

Asbestos is only harmful if it is damaged or broken into. Employees should avoid breaking into surfaces or walls as a matter of course. Notices are to be placed onto noticeboards or fixed using non-evasive methods.

The asbestos register shows there is no asbestos located in the Chapel Street office. The property was fully refurbished in 2010 and there is a survey available to confirm the absence of asbestos containing materials.

Checking and Reviewing Safety Arrangements

J49 is committed to ensuring agreed arrangements are checked on a regular basis. Checks will be undertaken by the Housing community manager, in conjunction with the responsible person, every quarter to ensure employee and office Health & Safety arrangements are being managed.

As this policy is developed, additional checking arrangements will be created to verify arrangements are in place and to provide the board with accurate information on current Health & Safety status.

The safety policy will be reviewed and updated annually, and/or when significant changes occur within the business, whichever is sooner.

Consultation and Escalation

J49 recognises the importance of worker and stakeholder contributions. J49 Housing Association is a small business with teams who have been working together for some time. The association will encourage an open consultative working environment where matters can be openly discussed.

J49 will more formally fulfil requirements to consult with staff via the Health & Safety panel. This is the forum whereby strategic decisions are made on the direction of safety management within the organisation before being ratified by the board.

Any changes to arrangements or the safety management system will be agreed here. Minutes will be published and made available to all employees.

Contractor or Consultant Capability

All contractors (including external consultants) will be expected to demonstrate they have the skills, experience, knowledge, and organisational capability to undertake tasks expected of them prior to engagement and to maintain this standard against criteria within this documentation on an on-going basis. Anyone responsible for engaging the services of external contractors, consultants or self-employed people are responsible for making sure they meet the standards specified within the responsibilities section of this document.

Arrangements for contractors working on property are contained within Part II of these arrangements.

Display Screen Equipment (DSE)

Employees who regularly use computer equipment (for at least 2 hours a day) will be asked to complete a DSE self-assessment annually by the Property Services Manager. DSE users who meet the criteria will be offered eye tests at the company's expense. Where assessments identify that adjustments are required to individuals' work stations, these will be made.

Where staff are working from home an assessment of the home work station will be undertaken to ensure standards are high and to minimise risk of injury.

Electricity

Only suitably qualified contractors registered with the National Inspection Council for Electrical Installation Contracting (NICEIC) will be permitted to work with electricity.

The office will have the same checks as the portfolio of managed properties which means a fixed wiring check will be undertaken of the whole building every 5 years.

Employees are not permitted to change light bulbs, replace fuses, or undertake any other electrical work.

Electrical equipment and appliances will be visually checked for obvious faults such as loose wires or damaged plugs as part of the Property Services Manager quarterly checks.

No one should use equipment which has an obvious electrical fault. If an issue is identified the appliance should be disabled and labelled to avoid it being used accidentally by someone else.

If multi-sockets must be used these will be connected to anti-surge devices.

Emergency Arrangements and Fire

Risks associated with fire will be included within the general office risk assessment, and a fire risk assessment completed.

In the event of a fire, the emergency evacuation arrangements for the office will be observed. Employees will be expected to co-operate with any requests to undertake training or briefings in respect of these arrangements.

Fire exits and escape routes must be always kept clear and the relevant response to the fire alarm made. On hearing a fire alarm evacuation is expected without delay via the nearest escape route following directional signage.

Fire doors exist to partition off parts of the building and prevent a fire from spreading. Fire doors between the office and staircases must be kept always closed.

Individuals should not delay their escape or attempt to use firefighting equipment to fight a fire. Fire extinguishers are provided to assist escape where a route is blocked in a life-threatening situation. Equipment must not be interfered with or misused.

Full cooperation with practice drills is expected. Visitors must be made aware of the fire arrangements for the building by their host. The route out of the building is unambiguous. The assembly point is in the public car park which means turning left out of the building when the fire alarm sounds.

If a J49 visitor or employee has a disability which is likely to affect their ability to evacuate safely a Personal Emergency Evacuation Plan (PEEP) will be agreed.

In the unlikely event of anyone being involved in a terrorist event, guidance and instruction from 1st responders or those in control of the site, property or area must be followed. In particular:

- Run – to a place of safety
- Hide – if running is not possible. Turn your phone to silent and turn off vibrate
- Tell – the police where you are when it is safe to do so by dialing 999.

Individuals should take responsibility for ensuing emergency contact information has been passed to the Property Services Manager and that these details are kept up to date.

Mobile phones enable communication in the event of an emergency. They are an important communication device and should be always charged and on the person.

Enforcement Officers

Any visits by enforcement officers (e.g., Environmental Health Officer, Fire Officer, Police Officer, Health and Safety Executive) must be reported to the responsible person.

Any contact with enforcement officers, including subsequent letters, notices or other action, must also be formally notified without delay so they can be acted upon immediately.

First Aid

There is a first aid kit located on the first floor adjacent to the Property Office. Anyone working out of the office on a regular basis will be provided with a personal first aid kit. A list of expected contents will be available inside the box, and this will be checked quarterly by the Property Services Manager as part of the office safety monitoring regime. Signage will be placed on the staff notice board which clearly identifies the names of first aiders and the location of first aid supplies.

If anyone has reason to use supplies from the first aid kit an entry should be made in the accident book and a report made via the Property Services Manager.

Anyone with specific medical conditions or allergies should ensure the Property Services Manager is aware. If necessary, a personal risk assessment will be undertaken.

Hazardous Substances – COSHH

There is no reason for employees to use chemicals as part of their normal work but there is the potential for exposure to hazardous substances on sites which have been outlined within Part II.

Substances used for cleaning will be COSHH assessed by the cleaning contractor and stored in the chemical cupboard.

Wipes or other materials obtained for use by staff to clean work areas and shared touch points will be environmentally friendly and not classified as hazardous.

Health Checks & Monitoring

New employees will be subject to a medical questionnaire. Personal risk assessments will be undertaken if this is deemed necessary. The health questionnaire will be re-issued annually by the responsible person to ensure any issues which may have arisen can be identified and personal risk assessments updated if required.

Additional health checks will be undertaken if deemed necessary via the risk assessment process.

Information obtained will be treated as confidential but will be used to make reasonable adjustments to work as required.

An annual health & staff wellness survey will be

Height

Employees should not stand on chairs or desks or undertake work from ladders, access equipment or outside of edge protection unless this work has been risk assessed. Safe working practices for employees visiting projects where construction work is being undertaken is contained within Part II of these arrangements.

Home Working

Some office work may be undertaken from home as home working has become more common.

Employees are responsible for ensuring they have sufficient space to work safely and will be asked to complete a DSE self-assessment form annually for their home work station. If adjustments are deemed to be necessary to ensure comfort whilst working from home these will be made.

If employees have to store PPE or J49 supplied equipment at home this should be in such a manner that it will not increase the risk of damage. Laptops must be securely closed at the end of every day.

Continual work from home can have an impact on wellbeing and some colleagues may not have the necessary space to work from home for continued periods. Where home working is in place to manage infection control this will be balanced by other factors and discussed as part of the health & safety panel.

Employees should not arrange client meetings at home.

Infectious Diseases

Staff suffering from sickness or diarrhoea should not work in locations where there is food handling or if they are likely to encounter vulnerable people.

A risk assessment will be undertaken as required to manage risks of any infectious disease (including, but not limited to COVID) considering government guidance or other stakeholder arrangements or requirements at the time. Controls will be agreed following risk assessments and as agreed by the health & safety panel. The risk assessment for infection control will be kept under review by the health & safety panel.

Physical controls will be implemented based on the hierarchy of risk control. First control measures will be prioritised which means:

- Working from home where it is possible to do so
- Reducing shared touch points
- Managing personal and building hygiene to high standards
- Using face coverings when relevant.

The responsible person will oversee arrangements and work alongside teams to ensure, as government advice is updated, new controls or arrangements are considered.

Information will be freely shared with all stakeholders.

In general, everyone should take personal responsibility for themselves and for others.

Create space between each other, regularly wash hands and wear a face covering when space cannot be maintained, especially indoors.

Lighting

Adequacy of office lighting will be assessed as part of display screen assessments. Anyone identifying hazards, such as lighting which is not working or flickering should report this to the Property Services Manager.

Lone Working

Staff must cooperate with the Property Services Manager in respect of the effective implementation of lone worker arrangements. Everyone is responsible for ensuring their emergency contact details are current and for keeping the office aware of their movements via outlook.

Risk Assessments will be undertaken to determined high risk activities. As a priority control lone work will be avoided in hazardous situations.

A detailed operating procedure has been developed which covers lone working, particularly in relation to work out of the office.

Manual Handling

Generally, manual handling is not expected by staff. Manual handling risk assessments will be undertaken if relevant.

New and Expectant Mothers

New and expectant mothers will have their work risk assessed and any measures required to ensure they can work safely will be implemented.

Respect and Inclusion

Anyone working for or on behalf of J49 is expected to behave in an appropriate and professional manner. Everyone should carry some form of ID with them so others can verify their identify. When people feel excluded, treated unfairly, or discriminated against it has the same effect on the brain as physical injury.

When dealing with each other and others at work everyone should consider their tone and behaviour. Everyone is an important part of the team, and everyone has an important part to achieve in providing the best possible service to our clients and for the ongoing growth of the business.

Speaking unkindly of each other creates an uncomfortable environment and if left unchecked becomes bullying behaviour. Everyone is different and works differently. As a small business anyone who is feeling aggrieved with another person's work or attitude toward them should discuss this directly, but kindly with them.

The person receiving this should consider their approach and both parties work to resolve matters.

Where issues are arising due to performance (e.g., not completing work by deadlines) this should also be discussed with them first. If issues keep arising due to performance this must be escalated to the responsible person.

Where an individual is repeatedly not performing their duties, this will be covered by the disciplinary or capability procedure.

Kindness, respect and seeing an issue from another's perspective is expected. Even difficult messages can be delivered in a professional and non-personal manner. This includes behaviour when dealing with residents and contractors.

Conversely, if customers or contractors behave in an inappropriate manner this should also be escalated in the same way.

J49 are committed to providing equal opportunities in employment and avoiding unlawful discrimination.

Risk Assessments

Risk assessments are in place and continue to be developed for the range of activities and roles undertaken by employees within the organisation. The risk assessments form the basis of these arrangements and how Health & Safety risks will be managed.

Employees will receive information, instruction and training identified from the assessments and if relevant, personal protective equipment will be issued. Employees are requested to co-operate with this process and observe any controls that have been implemented to protect them whilst they are at work.

Decisions will be made based on the hierarchy of risk control.

Hierarchy of risk control will be:

- Hazard Elimination – Activities which are not necessary will be avoided. The rest will be prioritised for risk assessment.
- Substitution – Can the task or hazard be substituted for something lower risk? This is about looking for clever alternatives to the way that work is undertaken and thinking of new ways to reduce the risk at source.
- Use of Barriers – Can a guard or a physical barrier be provided? This must be considered before the measures described above.
- Procedures – Can a Safe System of work be introduced? This could include a method for working safely.
- Warning Systems – Is it possible to let people know that there is a hazard? E.g., use of signage or labelling.
- Personal Protective Clothing – Is it possible to protect the individual with special clothing? This must be considered as a last resort and not as an alternative to the arrangements above.

Slips, Trips, and Falls

Work areas must be maintained in a clean and tidy manner. Employees are responsible for observing high standards of housekeeping throughout all work areas. Trailing leads and low-level obstacles must be kept to a minimum. Equipment or personal belongings must not be stored on the floor where these can become a trip hazard for others.

The Housing Community manager will ensure housekeeping is maintained to a reasonable standard and remind others of their obligations if it appears to be deteriorating. They will undertake a check of work areas for slip, trip, or fall hazards quarterly.

Smoking

Smoking is not permitted on site. Employees should not drop litter and use designated litter bins for cigarette waste. Do not dispose of cigarettes in rubbish bins containing combustible items. This policy applies equally to the use of e-cigarettes.

Legionella Prevention

We have procedures in place to prevent the growth and spread of legionella bacteria in water systems, including regular monitoring and maintenance of water systems, temperature control measures, and appropriate training for staff involved in water management.

Continuous Improvement

We are committed to continuously reviewing and improving our health and safety practices to ensure they remain effective and compliant with current regulations. This includes conducting regular audits, seeking feedback from employees and stakeholders, and implementing necessary changes.

This section contains information on helplines and services if team members feel they need to talk through their concerns confidentially.

This is a complex area to manage, and wellbeing can be affected by a combination of factors not just those from work. It is important for team members to take responsibility for their own health & wellbeing too. If work pressure starts to feel excessive speak to colleagues but also consider practical solutions too. Simple efficiencies can often lessen workloads or avoid duplication of effort when a problem is talked through. By talking through issues or concerns as a team, solutions can usually be found.

Reasonable adjustments will always be made where possible.

Professional and clear communication is important between colleagues.

Training

The Health and Safety at Work Act 1974 requires that all employees receive adequate information, instruction and training, commensurate with their duties from their employer.

Training is crucial in ensuring that safety management procedures are implemented appropriately, and no one should undertake tasks for which they have not previously been trained or instructed upon.

Training needs will be identified based on role and risk assessment and tracked by the Chief Executive.

New staff will undergo a health and safety induction, and all employees will undertake training on fire and emergency arrangements at least annually. Information will be provided to all employees when the Health & Safety policy document has been reviewed.

Directors and senior managers will attend Health & Safety training which covers their responsibilities at least every two years. Training



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