

HEALTH, SAFETY & ENVIRONMENT POLICY

Health, Safety, Environment and Business Resilience Department

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
--------------------------	-------------	-------------------------	-------------



1. Purpose

The Riverside Group Limited (TRGL) is committed to ensuring the health, safety and wellbeing of colleagues, customers, contractors, members of the public and the protection of the environment.

This Policy sets out the governance, oversight and assurance requirements that underpin our strategic management of health, safety and environmental risk across TRGL. Our work will never be so urgent or important that we cannot undertake it safely or without regard for the environment and each other.

TRGL is one of the largest housing associations in the UK and therefore operates in many different geographical areas and offers multiple types of services which impact the lives of many people, as well as the natural environment. Wherever we operate, and whatever we do, we must ensure that we maintain both our safe and healthy workplaces and our safety-first culture and minimise the impact we have on the natural environment.

TRGL is committed to:

- Building a safety-first culture that actively encourages positive health, safety and environmental practices through engaging with our colleagues, customers and others to whom we have a duty of care.
- Minimising any negative environmental impact of our current and future business practices.
- Wherever possible, seeking opportunities to use safer fuel sources and energy efficient technologies and equipment, to reduce our carbon footprint across our homes and fleet.
- Complying, so far as is reasonably practicable, with all applicable health, safety and environmental legislation, and meeting or exceeding regulatory requirements, particularly those set out by the Regulator of Social Housing (RSH), The Care Quality Commission (CQC) and the Office for Standards in Education, Children's Services and Skills (Ofsted).
- Encouraging a proactive reporting of health, safety and environmental issues, by applying just and learning-focused investigation procedures.
- Considering and promoting the wellbeing of our colleagues and providing occupational health programmes where required.
- Meeting our customers' needs by ensuring, so far as reasonably possible, that our homes and services do not expose them to harm and comply with the expectations of the Safety and Quality Standard.
- Ensuring robust health, safety and environmental risk mitigation strategies are in place to reduce negative impacts on colleagues, customers, and the natural environment.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



- Aligning to our ISO-aligned Health, Safety and Environmental Management System (ISO 45001 and ISO 14001), ensuring consistent governance, oversight and continual improvement across all TRGL operations.

2. Scope

This policy sets out the Health, Safety and Environment (HSE) governance arrangements, roles and responsibilities for TRGL, including the Group Board, all subsidiaries and business streams. Colleagues at all levels must comply with the requirements of this policy. A separate 'Oversight, Governance and Assurance' procedure contains a detailed description of TRGL's HSE governance and assurance framework.

3. Legislation

This Policy is informed by TRGL's core duties as set out in the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, together with all relevant regulatory standards, including the Regulator of Social Housing's Safety and Quality Standard.

All other applicable legislation, technical regulations and risk-specific statutory duties are captured in the Group HSE Risk Matrix, which is maintained and reviewed regularly. To manage the risks associated to legislation, TRGL has a suite of separate Policies, Procedures and Risk Assessments to ensure compliance.

Assurance against the Regulator of Social Housing's Regulatory Standards is delivered through Corporate Compliance and Assurance arrangements. The Group HSE function provides specialist assurance on health, safety and environmental controls that contribute to compliance with relevant standards.

This Policy is also informed by wider landlord and service-specific statutory duties, including the Supported Housing (Regulatory Oversight) Act 2023, where applicable to TRGL's supported housing and care and support services.

4. Policy Commitment

TRGL will:

- Maintain robust oversight of HSE risk through defined governance structures.
- Maintain governance and assurance systems that demonstrate compliance with the Safety and Quality Standard and ensure the continued safety, decency and compliance of our homes.
- Maintain governance and assurance systems that ensure the health, safety and environmental compliance of our workplaces.
- Embed a safety-first culture (see para 5.2) supported by active leadership and trusted reporting.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



- Comply with all relevant legal and regulatory obligations, as far is reasonably practicable, seeking to exceed minimum requirements where possible.
- Minimise our environmental impact and contribute to the commitments set out in the Group Climate Strategy.
- Ensure that contractors have the competence, tools and information needed to work safely.
- Promote a 'just and learning' culture (see the HSE Procedure para 3.3) where incidents are investigated fairly and lessons are shared openly.
- Continually improve our HSE performance through monitoring, risk-based planning and learning activities.

5. Policy Framework

5.1 Policy and Procedure

Health, Safety and Environment (HSE) Policies, Procedures and supporting documents (including Management Plans, defined as operational documents that explain how a policy or procedure is applied in practice) will be created, implemented, and maintained through TRGL's HSE Governance Framework.

Each Accountable Risk Lead (ARL) is responsible for ensuring policies within their risk area are embedded and delivered. All HSE Policies will be approved by the Safety-First Group (SFG), TRGL's strategic safety committee.

Policies and Procedures must be proportionate to the risk identified through the HSE Risk Matrix (our standard tool for assessing likelihood, impact and tolerability of HSE risks) and must be reviewed whenever the risk profile changes or a defined period elapses (i.e. every three years or sooner)

Specific HSE risk management policies will define our legal duty and set out what we must or must not do to comply with laws, regulatory standards, and the practices that best protect the natural environment, our customers, contractors, members of the public and anyone else to whom we owe a duty of care. Policies and procedures must also set out the reporting, monitoring and assurance arrangements that demonstrate whether objectives are being achieved.

Procedures will be developed, when necessary, to ensure that the different elements of policy intent are delivered operationally. Procedures can either be 'Group Standard Operating Procedures' meaning they cover TRGL or 'Local Operating Procedures' which detail how a local area of the group operates in accordance with the Policy.

Where necessary, management plans and guidance documents will be written to support embedding the procedures in each area of TRGL.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



In line with TRGL's Equality Diversity and Inclusion policy, policies and procedures will be subject to Equality and Impact Assessment (EIA) where they meet the screening criteria in the EIA toolkit.

Systems and procedures will be made available to those working under the control of TRGL so that they are aware of their individual HSE obligations.

The HSE policy statement sets out TRGL's commitment to HSE and is signed and authorised by the Group Chief Executive and applies to all parts of TRGL. The HSE Policy statement is required by law to be displayed in all TRGL's properties (Appendix A).

This HSE Policy will undergo a formal review at least every three years, or sooner if significant changes occur in legislation, regulation, risk profile, or operations. The TRGL HSE Team will also conduct an annual review to ensure the policy remains relevant and effective, with the results reported to the Safety-First Group.

5.2 Safety-First Culture

Management at all levels are responsible for shaping and reinforcing a strong Safety-First culture. Managers must set clear expectations that safety is never to be compromised, demonstrate visible care, and integrate safety into everyday decision-making.

Across all areas of TRGL, colleagues should feel able to stop work if it is not safe, raise concerns without fear, and trust that issues will be addressed promptly and fairly. Managers will create open, supportive environments, act on feedback, and model the behaviours expected of others.

Safety is a shared responsibility: every colleague plays an active role in protecting themselves, their teams, our customers and the environment.

5.3 Incident Management

All colleagues must report incidents, hazards and near misses through SAW-IT, TRGL's single reporting system. Managers must investigate all events in line with our Just and Learning Culture.

Significant events will be reported to the relevant regulator, including statutory notifications, such as RIDDOR to the Health and Safety Executive. Events that meet the Regulator of Social Housing's criteria for notification, including defined major customer incidents, will be reported in line with the Notification of Major Customer Incidents Procedure.

The TRGL HSE Team provides post-incident assurance to confirm whether legal and regulatory duties have been met and to identify any immediate or systemic concerns requiring escalation or learning.

5.4 Hazard and HSE Risk Management

Health and safety hazards arising from our services, operations, equipment and premises, including risks to contractors, sub-contractors, volunteers and members of the public, will be identified, risk assessed and appropriately controlled. Controls will be implemented to

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



eliminate or reduce risks so far as is reasonably practicable and in line with defined risk appetites.

Risk assessments will take account of the needs of our customers and colleagues, including any individual circumstances and reasonable adjustments required to ensure they can work or be supported in a healthy and safe manner.

Risk assessments will be reviewed following serious incidents, changes to legislation and prior to operational changes.

Each ARL will maintain a Risk Map (a visual representation of the key risks and related controls, gaps and sources of assurance) aligned to TRGL's HSE Risk Matrix and these maps will be reviewed whenever legislation, organisational structure or risk profile changes. Our approach is structured around four strategic safety risk themes: Homes, People, Customers, and Care and Support.

Environmental hazards, aspects and impacts arising from our activities and services will be identified, assessed, and managed through proportionate controls. Our Aspects and Impacts Register will be kept under review to ensure it reflects changes in legislation, policy, organisational structure, or strategic direction. As a national organisation, we recognise the growing environmental challenges associated with air quality, noise, the protection of green spaces, and climate change. TRGL is committed to managing these risks in support of safer, healthier and more sustainable communities.

A legal register will be maintained to identify all applicable HSE and monitor compliance. Legislation will be reviewed at least every six months. The TRGL HSE team will provide oversight and assurance on HSE legal compliance and preparedness for forthcoming legislative change.

5.5 Planning, Objectives and Targets

The TRGL HSE Team will set the forward plan for HSE improvement, in line with the TRGL corporate strategy and regulatory expectations. Each year, an annual HSE Improvement Plan, which sets the TRGL-wide HSE objectives and measurable targets, will be produced to support continuous improvement across all areas of HSE.

A dedicated climate improvement plan will continue to support TRGL's medium- and long-term environmental commitments, including progress towards net zero 2050.

5.6 HSE Resources

An HSE management structure will be implemented to support and guide the delivery of relevant policies, systems, objectives and targets, and to both review HSE performance and respond to significant incidents.

Appropriate competent resources to manage HSE risk and deliver HSE objectives and targets will be allocated by the senior management teams in each business stream and subsidiary.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



The TRGL HSE team will provide competent advice and overall assurance to Group Board and Chief Officers that all business areas are delivering their risk management responsibilities, reporting in line with UK HSE regulations, and continually improving their overall HSE performance.

5.7 Training, Awareness, and Competence

TRGL colleagues, contractors and sub-contractors will be competent to undertake their role in a safe and secure way, without causing harm to themselves, any other persons or the environment.

The individual competency required to address identified HSE risks and hazards will be assessed, with training needs identified and delivered during the risk assessment process.

Training records will be maintained of individuals' training and competency levels.

5.8 Consultation and Communication

We will consult with colleagues, customers, third parties, subsidiaries and recognised trade unions on HSE matters, including decision-making, policy and system development, setting objectives, changes to work practices, risk management and hazard identification.

HSE Information will be communicated to effectively to colleagues and other relevant stakeholders, with arrangements in place to support two-way engagement.

Systems, such as SAW-IT, will be used to identify, record and respond to health and safety concerns raised by colleagues and third parties. Matters will be resolved where possible or escalated to senior management where required.

The Group's strategic HSE committee, the Safety-First Group, will provide a forum for effective communication across business streams, subsidiaries and risk areas. It will support clarity of roles and responsibilities and promote the sharing of best practice and lessons learned. The Safety-First Group will be chaired by a Chief Officer.

Each part of the Group will establish a local Health, Safety and Environmental committee, comprising both union (where appointed) and non-union representatives, and chaired by senior management. Issues and opportunities identified at local level will be escalated to the Safety-First Group as appropriate. The Groups Environmental risk management committee, the Climate Strategy Group, will oversee delivery of our climate strategy and monitor material environmental risks and adverse events. This Group will also be chaired by a Chief Officer.

Recognised trade unions, including Unite, and established employee voice arrangements will be consulted and engaged on health, safety and environmental matters.

5.9 Performance Measurement and Monitoring

Performance against HSE objectives will be reviewed by management and any necessary remedial and improvement action will be undertaken.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



The Group HSE team will support the business by providing regular performance reporting from HSE systems, enabling informed decision-making and the continuous improvement of health, safety and environmental risk management.

5.10 HSE Compliance and Assurance Activity

The HSE Management System, TRGL's ISO-aligned framework of policies, procedures, controls, reporting standards and assurance processes, will be reviewed at least annually, or sooner where emerging risks, operational changes or business needs require, to ensure it remains effective in managing health, safety and environmental risks across TRGL.

Risk-based HSE compliance assurance audits will be undertaken in line with the Group risk register applicable legal requirements and relevant regulatory and management system standards, including ISO 45001 and ISO 14001. These audits provide independent assurance that the HSE Management System is being applied consistently, and that statutory and regulatory obligations are being met.

Audit findings and actions will be monitored through the Safety-First Group and the Group Audit and Risk Committee, supporting effective governance, continuous improvement and robust assurance of compliance.

TRGL will monitor the effectiveness of this Policy through performance reporting, management oversight and governance forums (see section 5.9). This ensures that risks, control effectiveness and areas for improvement are identified and addressed.

Assurance is provided through the HSE Compliance and Assurance Activity (section 5.10), including risk-based audits and independent reviews to confirm that legal, regulatory and internal requirements are being met.

Findings are reported through established governance routes, including the Safety-First Group and Audit and Risk Committee, to support oversight and continuous improvement.

This Policy will also be reviewed periodically to ensure it remains current and effective.

6. Further Information and Support

The TRGL intranet site, the RIC, contains information on HSE risk management and emergency response. The RIC site is also the centre of excellence for risk assessments that must be undertaken by relevant colleagues. The Policy Portal can also be found on the RIC Page, where colleagues can access this Policy and accompanying HSE policies.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



7.1 Governance, Oversight and Assurance Framework

This section sets out accountability for HSE risks at each level of the organisation. Detailed operational arrangements for delivering these responsibilities are defined in supporting procedures, frameworks and guidance.

TRGL operates a clear HSE governance, oversight and assurance framework that defines how HSE responsibilities are owned, exercised and monitored across TRGL. This policy sets the overarching expectations for governing HSE risk, performance and compliance, while the HSE Governance, Oversight and Assurance Procedure describes how these requirements are implemented in practice.

Strategic oversight is provided through established Group forums and accountable roles, ensuring that HSE risks and controls are understood, managed and escalated appropriately. The TRGL HSE function provides a source of independent assurance over performance and governance effectiveness, supporting continuous improvement and regulatory compliance across TRGL.

Accountable Risk Leads are responsible for ensuring that controls are in place and operating effectively, that appropriate assurance is obtained, and that material weaknesses or emerging risks are escalated through appropriate governance forums.

Riverside Scotland (Irvine Housing Association), as a separate legal entity, is included within this governance framework while retaining its own legal HSE obligations as an employer and landlord.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



THE RIVERSIDE GROUP HEALTH, SAFETY and ENVIRONMENT STATEMENT

At TRGL we believe in safety first, where the safety of our colleagues, customers and the natural environment come before anything else we do. Our work is never so urgent or important that we cannot take time to do it safely and with respect for the environment and each other.

Wherever we work, we are committed to the promotion of wellbeing and the prevention of injury, ill health and pollution including seeking to reduce the amount of carbon produced and the sustainable use of resources, while reducing our waste through good waste management, recycling, and the reduction of single use products.

We will:

- Define policy and procedures to promote and protect the health and safety of those to whom we owe a duty of care and the environment in which we work,
- Provide all the necessary resources for the implementation of our policy and procedures,
- Identify, train and use as necessary, competent resources within a defined structure, and allocate health, safety and environmental responsibilities to people who have the necessary skills,
- Promote a strong health, safety and environmental culture based on active and caring leadership, mutual trust, and courage,
- Create a healthy, productive, and inclusive workforce through effective management of staff wellbeing and occupational health,
- Meet and, where appropriate, exceed any legal and other requirements that apply,
- Identify, assess, and eliminate the health, safety and environmental hazards, impacts and risks that arise from our activities and services,
- Actively encourage the input of colleagues and others and make decisions based on a deep understanding of the work conditions and constraints relating to health, safety and environmental issues and build sustainable solutions,
- Investigate and report on incidents and share learnings on how we can prevent reoccurrence and improve,
- Set health, safety and environmental objectives and targets that reflect legal requirements and any risks we have identified, and show that we are seeking to continuously improve,
- Develop and introduce plans to make sure we achieve agreed objectives and manage identified risks,
- Consider the sustainable use of resources and materials and actively manage the impacts of our business activities on the environment with the aim of minimising, and where possible, eliminating them,
- Monitor, review, and report our performance, measured against set objectives and targets,
- Regularly review the suitability and effectiveness of our systems and identify improvements we need to make to our procedures to achieve continual improvement.
- We will put this policy into practice by creating a culture that actively encourages good health, safety, and environmental practices and by applying effective policies, procedures, systems, and processes.
- Everybody who works for us, anywhere, must act in a safe way and consider environmental issues when making decisions and taking action. This Policy covers all parts of TRGL including Irvine Housing Association trading as Riverside Scotland.



Paul Dolan – Chief Executive Officer
 Date: May 2026

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



Risk appetite and thresholds inform decisions on risk acceptance and escalation. Where health, safety or environmental risks exceed agreed thresholds, ARLs must escalate these through the HSE Governance Framework, with evidence of controls, mitigation and residual risk clearly recorded.

Risk Appetite	Risk Thresholds	Risk Indicators
- We seek to avoid legal or regulatory breaches for HSE. - We seek to minimise our HSE risks, so far as is reasonably practicable.	- Compliance with all legal and regulatory requirements for HSE - Zero colleague fatalities (work related, including driving on business) - Zero customer fatalities due to a HSE incident at the RHG property - No irreversible damage	- Number of health and safety related fatalities or catastrophic injuries - Number of breaches to health and safety legislation leading to prosecution - Reported colleague accident rate below industry standard. - RIDDOR reports below industry standard. - Percentage major health and safety incidents <5% of total incidents reported.

10. Appeals and Complaints

TRGL is committed to ensuring that concerns, complaints and appeals relating to health, safety and environmental (HSE) matters are managed in a fair, transparent and timely manner.

Customers, colleagues, contractors and other stakeholders have the right to raise concerns or challenge HSE-related decisions, actions or service provision where they believe standards have not been met or risks have not been appropriately managed.

All complaints will be managed in line with the Group's Complaints Policy and procedures. HSE-related complaints will be recorded, investigated and responded to in accordance with those arrangements, ensuring that:

- concerns are acknowledged and addressed promptly;
- investigations are proportionate to the nature and severity of the issue raised;
- findings are clearly communicated to the complainant; and
- appropriate remedial actions are identified and implemented where required.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------



Where an individual wishes to appeal a decision relating to HSE risk, control measures or service outcomes, this will be escalated and reviewed through appropriate management and governance routes to ensure independence, consistency and fairness in decision-making.

Themes and trends arising from complaints and appeals will be monitored by the HSE function and reported through governance arrangements, including the Safety-First Group, to support organisational learning and continuous improvement.

11. Equality, Diversity and Inclusion

TRGL is committed to Equality, Diversity, and Inclusion. We strive to be fair in our dealings with all people, communities, and organisations, considering the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with TRGLs Equality, Diversity and Inclusion Policy and has been subject to an Equality Impact Assessment.

GENERAL - EXTERNAL

Policy Approval Date:	14 May 2026	Date of next review:	14 May 2029
-----------------------	-------------	----------------------	-------------

