

Health and Safety Policy Statement

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This is a Mandatory Policy			

1. Supporting Documents

This policy must be read in conjunction with all mandatory health and safety policies, and others relevant to employee role.

2. Introduction

2.1 This policy statement will advise all within the organisation of the organisational arrangements for the management of health and safety. This will include health and safety management structures and responsibilities. It should be used alongside the individual topic health and safety policies.

2.2 The Group's Directors with the active support of the Group Leadership Team will ensure that a robust health and safety culture is embedded throughout the Group. The key focus is on continuous monitoring to ensure compliance with required standards. Both the Group's Directors and Group Leadership Team recognise the need to provide strong leadership and will ensure that decisions are made on the basis that Health and Safety is a fundamental part of the business.

- Improvements will be achieved by reviewing current practices and addressing any issues that arise with a focus on ensuring lessons are learned from these and applied to future practice.
- Performance will be monitored against statutory requirements.
- Implementation of the Policy will be delivered with emphasis on active employee involvement and through procuring appropriate expertise both internally (provided by suitably qualified and experienced health and safety staff) and externally (through appropriately monitored arrangements with external contractors).
- The Group will provide adequate resources to ensure that its obligations in respect of health and safety are met.
- The Group will take all reasonable steps to provide:
 - Safe places of work with appropriate welfare arrangements.
 - Suitable equipment appropriately maintained.
 - Appropriate arrangements for the use, handling, storage and transport of articles and substances
 - Suitable and sufficient information, instruction, training and supervision appropriate to the tasks being undertaken.
 - The Group recognises that good health and safety practice goes hand in hand with good support and education delivery.

3. Aim/Scope

Keys Group is committed to ensuring the health, safety and welfare of the people it supports, its staff and visitors and will, so far as reasonably practicable, establish procedures and systems necessary to implement this commitment and comply with its statutory obligations under Section 2 of the Health and Safety at Work etc. Act 1974.

4. Abbreviations and Definitions

4.1 Reference to the Group is a reference to Keys Group Limited and where applicable also means or includes any subsidiary or subsidiaries of Keys Group Limited.

5. Policy Content

Summary of Organisation and General Arrangements

5.1 Consultation with Employees

The Company has a specific policy document dealing with consultation and communication across the whole organisation, this includes:

- Discussion of health and safety issues within team meetings and Managers meetings.
- Governance Committee meetings
- Communication of health and safety news, updates, policies and risk assessments.

5.2 Risk Assessments

The Company will provide a system of appropriate written risk assessments relating to the risks to the health and safety of its employees whilst they are at work, people we support, and others who may be affected by the Company's work activities. A selection of generic risk assessment documents will be available and will be edited by the service in order to make them service specific. Specialist risk assessments for individual sites such as Fire, Water Quality and Asbestos are completed by approved consultants.

5.3 Sharing of Information

Monitoring and auditing of the systems in place to manage health and safety risks will occur on a quarterly basis in a report to the Governance Committee. This will ensure that the Committee are made aware of the strengths and weaknesses of risk management systems throughout the Company and target any remedial action as appropriate.

5.4 Specific Policies

The Group has a raft of specific health and safety policy documents providing guidance in dealing with the risks to its day to day business. These documents are made accessible to employees via the document management system and Workvivo

Policies will be reviewed in consultation with specialist departments / employees as relevant.

5.5 Training

To ensure that the policies are embedded within the business with staff having appropriate levels of awareness, there is a system of formal and informal training.

5.6 Funding

The Group will ensure that sufficient resources and efforts are dedicated to health and safety matters inclusive of the provision of monitoring health and safety compliance within the group. In particular it will ensure that any urgent requirements (based on a process of risk evaluation) for expenditure are met without delay.

5.7 Expertise

- Internal: The Health and Safety (& Risk Management) Team are appointed as the suitably qualified and experienced competent persons to co-ordinate the Group's health and safety provision.
- External: Competent specialists in specific areas of risk management will be appointed in order to provide professional guidance and monitoring in their specific areas.

5.8 Monitoring

A robust system exists to ensure the individuals with direct operational responsibility are delivering health and safety compliance. This includes the vital system of health and safety audits by the Health and Safety team; monitoring of local health and safety checks by service managers; reporting of incidents and events and the monitoring and analysis of information arising out of them.

6. Responsibilities

6.1 The Board and Group Leadership Team

These bodies will ensure that business decisions take into account any health and safety implications and that issues are discussed as part of the monthly Group Leadership Team meeting and Board meetings respectively. Health and safety forms part of the Quality standing item on agendas for both.

- The Group Leadership Team will consider, and narrow as appropriate, the scope of issues to be brought to the Board. It will always report to the Board any potentially serious health and safety-related incident and/or any matter which it considers likely to become the subject of a potential prosecution.
- The members of the Group Leadership Team and Board as directors and members of the Board have collective and individual responsibility for health and safety implications and issues in respect of the Group's business

6.2 Group Governance Committee

This group meets quarterly, and part of its remit is to:

- Advise the Group Leadership Team of recommendations for actions as is thought necessary to ensure that reasonable steps are being taken to promote the health and safety of service users, employees and others using / entering the Company's premises.
- Consider matters referred to them via the consultation process.
- Assist in the development of health and safety policies and safe systems of work.
- Consider reports from the Inspectors of enforcing authorities.
- Monitor compliance reports from external contractors for planned maintenance under the Health and Safety at Work Act and monitor the completion of actions arising from these reports to ensure closure.
- The Group are responsible for compiling, agreeing, and monitoring the company risk register.
- The Chief Executive Officer (or other nominated Director in his absence) sits on this Group.

6.3 Associate Director of Risk Management

Will monitor and keep under periodic review all health and safety policies and practices and provide strategic direction and practical guidance to the Group.

6.4 Group Health and Safety Manager

Will support the Associate Director of risk in the monitoring and review of the above and provide support to the group where required.

6.5 Managing Directors / Chief Operating Officers

Responsibility for health and safety in each operational business area is delegated to each Managing Director to:

- Ensure the implementation and monitoring of the Group's health and safety risk management systems in line with their Director responsibilities as outlined by the HSE (2013) document "Leading Health and Safety at Work" <http://www.hse.gov.uk/pubns/indg417.pdf>
- Develop and maintain mechanisms for ensuring they are kept informed of any significant health and safety failures and of the outcome of investigations into their causes and ensuring these are escalated as necessary via the Governance Committee or if urgent, immediately to the Chief Executive Officer or other members of the Board.

6.6 Other Functional Directors / Heads

All functional Directors / Heads will ensure that any decisions are made with appropriate consideration of the impact of health and safety issues.

6.7 Regional Managers, Operations Managers

Responsibilities follow those of their Managing Directors, but applied in relation to the individual services for which they have responsibility. This includes routinely visiting the services under their control to monitor compliance with health and safety policies. They must ensure that any relevant matters are reported without delay to their Managing Director

6.8 Service Managers

The provision of a healthy and safe working environment within each Service is the responsibility of the Service Manager. This includes responsibility for activities organised by the Service outside of its own accommodation, such as when taking part in Service User activities, trips or holidays.

The Manager must ensure that any relevant matters are reported without delay to their Regional Manager, or if they cannot do so, to their Managing Director.

Service Managers / Line Managers are responsible for ensuring all staff are familiar with policies and procedures relevant to their work area.

6.9 All Employees

All employees of the Group are responsible for ensuring they conduct themselves in accordance with the Group's health and safety policies. They must co-operate with their line managers / heads of departments so that their health and safety responsibilities can be discharged.

All employees have a duty to take care of their own health and safety and that of others who may be affected by their actions at work.

All employees will notify their line manager / head of department of any health and safety issue or potential issue of which they become aware, so as to enable the company to fulfil its obligations.

All employees will partake of all training required and provided by the Group and relevant to their role.

6.10 Health and Safety Responsibilities Chart

See Appendix 1 of this policy

7. Education and Training

7.1 All new employees will receive an orientation to the process for health and safety management within Keys Group which includes this policy and other health and safety policies relevant to their role as part of their induction.

7.2 Each employee will receive training commensurate with their role and will receive refresher training at intervals deemed as good practice, along with updates regarding any changes to legislation where appropriate.

8. Equality Impact Statement

All relevant persons are required to comply with this policy and must demonstrate sensitivity and competence in relation to diversity in race, faith, age, gender, disability and sexual orientation. If you, or any other groups, believe you are disadvantaged by this policy please contact your line manager. Keys Group will then actively respond to the enquiry.

This Statement is signed by the Chief Executive Officer following its approval by the Group Leadership Team and Board and is brought to the attention of all employees. It will be reviewed and may be modified at any time, with any modifications being brought to the prompt attention of all employees.

This policy is owned by: David Manson (Chief Executive Officer)

Date: 10th November 2025

Signed:

A handwritten signature in black ink, appearing to read "D. Manson", followed by a horizontal line.

Appendix One – Group Health & Safety Responsibility Flowchart

