



Health & Safety Policy

**Clear governance.
Strong practice.
Safe services.**



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1. Purpose and Scope

D2 PropCo Ltd provides accommodation and property services to people and families experiencing homelessness, including vulnerable adults, care experienced young people and unaccompanied asylum seeking children (UASC). Our work takes place in residents' homes, community settings and office environments, and includes the delivery of house management, repairs, maintenance and statutory compliance tasks.

These activities create a diverse health and safety landscape. This policy sets out D2's strategic approach to managing those risks in a way that protects residents, staff, contractors and visitors. It ensures that health and safety is embedded in decision making, proportionate to the level of risk, and aligned with our commitment to delivering safe, high quality services.

This policy applies to all employees, directors, volunteers, contractors and partners acting on behalf of D2.

2. Legal and Regulatory Framework

D2 operates within a complex and evolving legal environment. Our health and safety responsibilities arise from statutory duties, contractual obligations and our ethical commitment to protecting vulnerable people. This policy ensures that D2 meets its obligations under relevant legislation, including:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Housing related statutory compliance (gas, electrical, fire, legionella, asbestos)
- Fire Safety Act 2021 and Fire Safety (England) Regulations 2022
- Control of Substances Hazardous to Health (COSHH)
- Manual Handling Operations Regulations 1992
- Workplace (Health, Safety and Welfare) Regulations 1992
- Construction (Design and Management) Regulations 2015 (where applicable)

D2 is committed to aligning its systems and practices with recognised industry standards and will pursue external accreditation (such as SafeContractor or equivalent) to demonstrate compliance, competence and continuous improvement. This evidences our commitment to health & safety and offers confidence to our current and future partners.

We also recognise the value of specialist expertise. D2 receives professional health & safety support, training and advice from Peninsula, ensuring our systems reflect current legislation, best practice and sector leading standards.

As legislation and guidance evolve, D2 will adapt its systems, training and assurance processes to ensure ongoing safety and legal compliance.



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This policy supports compliance with:

- Health and Safety at Work Act 1974
- Housing related statutory and contractual duties
- Data protection legislation
- Equality Act 2010
- Human Rights Act 1998
- Safeguarding legislation for adults and children
- Employment law and workforce standards
- Contractual obligations with local authorities and partners

3. Health & Safety Principles

Health and safety at D2 is shaped by the realities of our work: supporting people who may be vulnerable, traumatised or living in unstable circumstances; delivering repairs and maintenance in residents' homes; and operating within communities where risks can be unpredictable. Staff and contractors may at times work alone, respond to urgent issues and enter environments where behavioural, environmental or community based risks may be present.

These principles set the tone for how D2 approaches health and safety; not as a narrow compliance exercise, but as a core part of delivering safe, respectful and person centred services. They reflect our commitment to informed decision making, open communication, and a culture where learning from incidents and near misses is valued and expected. They also reflect our commitment to accessing specialist advice and external accreditation to ensure our systems remain robust and aligned with industry standards.

Our approach is guided by the following principles:

- **Safety first** - safeguarding and health & safety risks are never compromised.
- **Proportionality** - risks are assessed and managed in a balanced, evidence based way.
- **Resident centred practice** - decisions consider trauma, vulnerability and lived experience.
- **Informed decision making** - staff and contractors must have access to relevant risk information before entering a property or engaging with a resident.
- **Learning from incidents and near misses** - near misses are treated as essential intelligence that helps prevent harm.
- **Safe homes** - accommodation is maintained to statutory and contractual standards.
- **Safe workplaces** - offices, vehicles and community settings are safe and well managed.
- **Competent workforce** - staff and contractors are trained, supported and supervised.



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- **Clear communication** – risks, decisions and expectations are recorded and shared.
- **Strong contractor management** – partners work to D2’s standards and report concerns.
- **Continuous improvement** – systems evolve as the organisation grows.

4. Key Areas of Health & Safety Responsibility

D2’s health and safety responsibilities span multiple environments, each with its own risk profile. Our accommodation supports people who may be experiencing crisis, trauma or instability. Our repairs and maintenance teams work in residents’ homes and community settings, often alone. Our offices support the coordination of services and must provide a safe and healthy working environment.

Understanding these areas and the interactions between them, is essential to managing risk effectively. This section outlines the core areas where D2 must maintain strong, consistent and proportionate controls, ensuring that staff, residents, contractors and visitors are protected from harm.

4.1 Resident and Accommodation Safety

D2 provides homes to people who may face multiple disadvantages. Risks may arise from property condition, resident behaviour, community dynamics or the way these factors combine in real time and real world scenarios. We ensure that accommodation is safe, compliant and well maintained, and that staff and contractors understand the risks associated with entering residents’ homes. Relevant risk information must be shared before visits take place. When risk information is available, staff must review this information in advance of visits.

4.2 Repairs and Maintenance

Repairs and maintenance staff frequently work alone in residents’ homes and community settings. We ensure that lone working arrangements are robust, that staff understand the risks associated with the people we house, and that contractors are briefed on local community risks. Safe systems of work, PPE, dynamic risk assessment and clear communication are essential to protecting staff and residents. Staff and contractors must be informed of any known risks before attending a property and must apply this knowledge in anticipation of, and during visits.

4.3 Office and Workplace Safety

Our office environments support the coordination of services and the management of operational activity. We ensure that offices are safe, accessible and compliant, with appropriate arrangements for fire safety, first aid, DSE, manual handling and welfare facilities. Staff wellbeing and workload are monitored to ensure a healthy working environment.



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4.4 Workforce Safety

Many staff work independently, travel between properties and engage with residents who may be distressed, unwell or experiencing crisis. We ensure that lone working procedures, dynamic risk assessment, escalation routes and wellbeing support are in place. Staff must not enter a property without access to relevant risk information. We monitor incidents, near misses, behavioural risks and community based risks to ensure staff can work safely and confidently.

4.5 Visitors, Residents and the Public

We ensure that visitors, residents and members of the public are protected from harm when interacting with our services. This includes safe access to buildings, clear communication of hazards, and appropriate emergency arrangements.

5. Roles and Responsibilities

Effective health and safety relies on clear accountability at every level of the organisation. D2's governance model recognises that while the Board holds ultimate responsibility, safe practice is delivered through the actions of managers, staff and contractors every day.

This section sets out who is responsible for what; from strategic oversight to frontline decision making. It ensures that everyone understands their role in identifying, reporting and managing risk; sharing relevant risk information; and contributing to a culture where safety, transparency and learning are embedded in day to day practice.

Board of Directors

- Holds overall responsibility for health and safety.
- Sets strategic direction and receives assurance on compliance.
- Ensures health and safety is resourced and embedded.
- Supports the pursuit of external accreditation and independent assurance.

Managing Director

- Provides strategic leadership for health and safety.
- Ensures systems, processes and controls are in place.
- Ensures compliance with statutory and contractual requirements.
- Oversees engagement with specialist advisors.

Senior Management Team

- Implements this policy across services and properties.
- Ensures risk assessments, audits and compliance checks are completed.
- Escalates significant risks to the Board.
- Ensures staff and contractors receive relevant risk information.



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Managers

- Maintain safe environments within their areas of responsibility.
- Ensure staff understand and follow health and safety procedures.
- Respond promptly to hazards, incidents and near misses.
- Ensure staff have access to relevant risk information before visits.

All Staff

- Follow safe working practices and report hazards immediately.
- Use equipment, PPE and tools safely and appropriately.
- Participate in training and supervision.
- Conduct dynamic risk assessments and escalate concerns.

Contractors and Partners

- Must comply with D2's health and safety expectations.
- Must report hazards, incidents or near misses immediately.
- Must work safely in residents' homes and community settings.
- Must be informed of relevant risks before attending properties.

6. Health & Safety Arrangements

D2's arrangements translate our principles into practical systems that support safe, lawful and consistent operations. They reflect the varied environments in which D2 services operate and ensures that our approach to health and safety is proportionate to the risks in all setting.

These arrangements include how we assess risk, manage lone working, share essential risk information, respond to incidents and near misses, maintain statutory compliance, and ensure contractors work safely. They provide the framework through which D2 protects people, maintains safe homes and workplaces, and ensures that learning and improvement are continuous.

D2 also receives specialist support, training and advice from Peninsula, ensuring our arrangements reflect current legislation, best practice and industry standards. Peninsula also undertakes routine health and safety audits on behalf of D2, including shadowing staff, observing work practices and conducting spot checks on properties and work locations. These audits provide independent assurance and help identify opportunities for improvement.

D2 uses the BrightSafe health & safety platform to support safe working practices across the organisation. BrightSafe provides staff with instant access to safe systems of work, risk assessments and essential health & safety documents on their mobile devices. The system enables real time reporting of hazards, incidents and near misses, including photo uploads, and supports ongoing learning through CPD accredited e learning modules. BrightSafe



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helps ensure that frontline staff have the information they need, when they need it, to work safely and confidently in residents' homes and community settings.

D2 has established a Health & Safety Panel to support the ongoing development of safe practice across the organisation. The Panel brings together staff from different roles to review near misses, contribute to risk assessments, promote positive practice and act as champions for health and safety within their teams. The Panel plays an important role in embedding a learning culture and ensuring that frontline experience informs policy, procedures and improvement activity. Our arrangements include:

- Risk assessments for all relevant activities
- Safe systems of work for repairs and maintenance
- Lone working procedures
- Risk information sharing processes
- Incident, accident and near miss reporting
- Fire safety management
- Statutory compliance programme (gas, electrical, fire, legionella, asbestos)
- Contractor management and competence checks
- Training and supervision
- Workplace inspections and audits
- Monitoring of resident feedback and complaints

D2 maintains clear processes for sharing relevant risk information with staff, contractors and partners. This includes:

- Behavioural risks associated with residents
- Environmental or community based risks
- Previous incidents, accidents or near misses
- Safeguarding concerns
- Property related hazards
- Information from partner agencies

Risk information must be shared in a timely, proportionate and lawful way. Staff must not enter a property without access to relevant risk information.



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7. Monitoring, Assurance and Continuous Improvement

Monitoring and assurance help us understand how well our health and safety systems are working in practice. Some risks can change quickly, for example resident behaviour, community dynamics or property condition. Other risk may emerge over time through patterns in incidents, near misses or compliance activity. Our approach ensures we can identify both immediate issues and longer term trends, and act on them in a timely and proportionate way.

This section sets out how we track performance, analyse incidents and near misses, review compliance, and ensure that lessons are learned and acted upon. It ensures that the Board receives meaningful assurance, that risks are identified early, and that D2 continually strengthens its approach as the organisation grows and evolves.

D2 also benefits from independent health and safety services provided by Peninsula, which include:

- Annual health and safety review visit
- Reviewing documentation, risk assessments and safe systems of work
- Specialist advice and support services as and when required

This type of specialist expert advice and assistance provides an external perspective on our systems, highlight areas of good practice, and identify opportunities for improvement. They form a key part of our assurance framework and support our commitment to achieving and maintaining recognised health and safety accreditations such as SafeContractor.

The Health & Safety Panel contributes to D2's assurance framework by reviewing trends in incidents and near misses, identifying emerging risks and supporting the development of risk assessments and safe systems of work. Insights from the Panel help ensure that learning is shared across the organisation and that improvements are grounded in real operational experience. D2 monitors:

- Compliance checks and statutory certification
- Incident, accident and near miss analysis
- Lone working data and escalation patterns
- Behavioural and community based risk trends
- Property inspections and audits
- Contractor safety performance
- Workforce training records
- Progress toward external accreditation and independent assurance
- Findings and recommendations from Peninsula audits

Findings are reviewed by the Senior Management Team and reported to the Board to ensure transparency, accountability and continuous improvement.



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8. Review

This policy will be reviewed annually, or sooner if legislation, regulation or organisational needs change.

9. Policy Approval and Version Control

Policy Owner:	Managing Director
Approval:	Board
Date:	09/04/2026
Tier:	1 – Core Governance Policy
Review Cycle:	Annual

Lets Talk

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