

ELHA STRATEGY

Date Issued	May 2025
Date Last Reviewed	n/a
Department	Corporate
Title	Health & Safety Strategy 2025/28
Objective	To set out our strategic direction in relation to Health & Safety.
Responsible	Chief Executive
Next Review Date	May 2028

1.0 Background

The objective of our Health & Safety (H&S) Strategy is to establish a structured and proactive approach to safeguarding the H&S, and well-being of employees, contractors, tenants, visitors and other stakeholders within the organisation. This involves maintaining a safe working environment, minimising risks, ensuring compliance with relevant laws and regulations, and fostering a culture of safety.

- 1.1 This document sets out East Lothian Housing Association's (ELHA) direction for H&S. Whilst ensuring compliance with H&S is a group activity, R3 Repairs Limited (R3) follows its own approaches to H&S and will not be subject to this strategy (although R3 office-based staff are covered by this strategy where they occupy an ELHA premise).
- 1.2 Our key achievements in the H&S management systems to date have included;
 - Chief Executive, Directors and Managers actively involved in the quarterly H&S Committee where scrutiny and challenge of H&S performance and activity is encouraged
 - Adoption and Implementation of EVH H&S Control Manual, including the regular review of Health and Safety policies
 - Procurement and development of EVH Landlord Facilities Health, Safety & Welfare Management System
 - Review of reporting and classification systems for accidents, incident and near misses

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- Continually reviewing H&S Key Performance Indicators, adverse incident information and cyclical compliance data; with the aim of informing and improving the management of risks
- Involvement of employees in a regular consultation forum on H&S

2.0 Aims and Purpose of the Strategy

Our aims and purposes of this strategy are:

2.1 Protecting Health and Well-being

- Safeguarding employees, contractors, tenants, visitors and stakeholders from risks and hazards in the workplace and tenant's homes
- Minimising incidents, injuries and illness

2.2 Compliance with Legal Requirements

- Ensuring adherence to H&S laws and regulations
- Avoiding legal penalties and maintaining ethical standards

2.3 Promoting a Safe Work Environment

- Fostering a culture where safety is prioritised
- Encouraging proactive identification and mitigation of hazards

2.4 Reducing Costs

- Minimising costs associated with workplace accidents, including medical expenses, legal fees and lost productivity
- Enhancing efficiency by reducing disruption

2.5 Boosting Employee Moral and Productivity

- Building employee confidence in their safety
- Creating a positive work environment that enhances engagement and productivity

2.6 Supporting Organisational Goals

- Aligning H&S practices with broader business objectives
- Demonstrating corporate responsibility to stakeholders and the community

2.7 Encouraging Continuous Improvement

- Using data and feedback to regularly assess and enhance safety practises
- Integrating new technologies and methodologies to address emerging risks

The overriding purpose of this Strategy is the continued development and improvement of the existing H&S management systems in a collaborative way that supports our corporate responsibilities.

3.0 Scope and Objectives

The scope of this Strategy applies to:

- All Board members
- All employees of ELHA
- All customers, contractors, volunteers and other stakeholders visiting or carrying out work on behalf of ELHA

The H&S Strategy sets out four key objectives:

1. Taking H&S management to the next level
2. Aligning H&S with ELHA's strategic ambitions
3. Data and performance driven H&S management decisions
4. Making H&S everyone's business

Each of these objectives are of equal importance and work to achieve these will be progressed simultaneously.

H&S objectives are essential for several reasons, as they provide a clear roadmap for maintaining and improving safety, this requires promotion through:

- Leadership Commitment – Led by the Chief Executive and Senior Management Team, to actively demonstrate their commitment to safety by participating in safety initiatives, encouraging open communication and modelling safe behaviours
- Manager / Employee empowerment – to ensure employees are involved in safety discussions through the H&S Committee and regular feedback sessions
- Supported with in-house H&S knowledge and experience (including the Director of R3 & Asset Management, Corporate Services Manager, Asset Manager and Safety & Compliance Officer)

3.1 Objective 1 – Take H&S Management to the Next Level

We have devised and developed H&S management systems with the overall aim of embedding H&S into all aspects of the organisation.

In order to achieve this objective, we will:

Foster a Proactive Safety culture

- **Leadership Commitment:** The Chief Executive and Directors must actively demonstrate their commitment to safety by participating in safety initiatives, encouraging open communication, and modelling safe behaviours
- **Employee Empowerment:** We involve employees in safety decision-making through committees, suggestion programs, and regular feedback sessions
- **Psychological Safety:** We promote mental well-being by addressing workplace stressors, offering mental health support and resources, and foster a supportive working environment

Enhance Communication and Engagement

- **Digital Platforms:** Implementing mobile apps or similar systems for easy access to safety resources, reporting tools, and updates
- **Regular Campaigns:** Conducting themed safety awareness campaigns focusing on different aspects of H&S

Some identified quick successes are listed below:

- Maintaining all existing H&S management systems until these are further developed and improved
- Defining the levels of competence (a competency matrix) for all job roles so employees will be better equipped to identify and manage risks particularly those relating to legal compliance
- Audit existing H&S training records held on People HR to determine existing gaps in competence
- Implementation of the Peoplesafe application to support lone working and personal safety
- Raising levels of technical competence of all employees through future recruitment and/or training of existing employees
- Increasing H&S related training opportunities for employees using nationally accredited training courses and through local education providers and networks

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- Updating all H&S related policies and procedures so these are user friendly and include clear standards against which successful implementation is measured
- Developing a range of practical, suitable and sufficient risk assessments and method statements (RAMS) relevant to each area of our operation
- Establishing a programme to monitor the extent of implementation of all H&S policies, procedures and RAMS, reporting findings to the H&S Committee
- Continuing to monitor (and as necessary, implement) changes arising from legislation, guidance and best practice originating at a national level and within the housing sector
- Using a combination of information, instruction and training alongside consequential action for non-compliance to further drive H&S culture within the organisation

3.2 Objective 2 – Align H&S with ELHA's Strategic Ambitions

The stand-alone approach to H&S via the previous H&S Committee has been the driving force for H&S management activity, and much has been achieved through this approach. It is now time to align the management of Health, Safety, Fire and Environmental risks to the overall strategic ambitions of the organisation.

Aligning H&S with our strategic ambitions requires integrating safety objectives into the core business strategy and ensuring they complement the vision and goals of the Association.

Organisational Goals

- **Vision Alignment:** Analyse how H&S contributes to the Association's broader goals (e.g., sustainability, innovation)
- **Strategic Objectives:** Identify specific strategic ambitions (e.g. reputation management) where H&S can provide support

Position Health & Safety as a Value Improvement

- **Cost Efficiency:** Demonstrate how effective H&S management reduces costs related to incidents, downtime, and insurance
- **Reputation Enhancement:** Position the Association as a benchmark in safety to build tenant trust and create links between safe environments and employee engagement

To achieve this objective, we will:

- Make sure that H&S is one of the first items on team meeting agendas
- Actively and regularly involve in-house H&S expertise at all stages of planning and development of new homes and services

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- Aim to avoid or minimise H&S risks in the design of all new developments and services (for example, fire evacuation strategies, ensure clear signage, proper lighting etc.)
- Identify and manage any H&S, fire and environmental risks in relation to each service area or initiative
- Assess the value for money of H&S activity, initiatives and developments, considering both the capital and ongoing costs
- Deliver integrated management of H&S, fire and environmental risks seamlessly through the development, asset management and repairs life cycle of our homes
- Take account of contractor's H&S performance as part of the procurement process and value for money assessment
- Report relevant H&S performance data and information into the relevant decision-making forums, principally H&S Committee and the ELHA Board

3.3. Objective 3 – Data and Performance Driven H&S Management Decisions

To effectively implement Data and Performance Driven H&S Management Decisions this requires using quantitative and qualitative data to guide, monitor and shape H&S strategies. This approach ensures decisions are based on evidence rather than intuition, leading to better safety outcomes.

There are many areas that support this objective:

Key Performance Indicators (KPI's) for H&S

Defining measurable KPI's to track safety performance and outcomes including:

- **Incident Rates:** Total Recordable Incident Rate (TRIR), Lost Time Injury Frequency Rate (LTIFR)
- **Near Miss Reports:** Number of near misses reported and resolved
- **Training Completion Rates:** Percentage of employees completing mandatory safety training
- **Risk Assessments:** Number of completed assessments and follow-up actions
- **Compliance Metrics:** Percentage of compliance with safety audits or inspections

Data Collection Tools and Methods

We will deploy tools and methods for comprehensive data collection such as:

- **Mobile Apps:** Enabling employees to report incidents or unsafe conditions instantly
- **Sensors and Automation:** Using sensors to monitor environmental conditions (for example, air quality and noise levels)
- **Survey Tools:** Gathering employee feedback on safety perceptions and areas for improvement

Analysing and Visualising Data

- **Dashboards:** Using dynamic dashboards to provide real-time visibility into H&S performance metrics
- **Trend Analysis:** Identifying patterns in incident data to anticipate potential risks
- **Heatmaps:** Highlighting high-risk areas or activities
- **Benchmarking:** Comparing our safety performance with industry standards and other RSLs

Data Transparency and Reporting

- **Internal Reporting:** Sharing performance data with employees to foster a safety-first culture
- **External Reporting:** Publishing safety performance metrics in sustainability or annual reports
- **Stakeholder Engagement:** Using data to demonstrate our commitment to safety to lenders, regulators and the Tenant Involvement Group

By using data and performance metrics, we can make informed, proactive decisions that enhance workplace safety, create safe property environments, aligning this with overall business targets.

We already have established areas of performance:

- There are well established systems in place for collecting and collating H&S performance information such as adverse events reporting and classification, resolving adverse event actions to prevent reoccurrence, completion of H&S training (e-learning) etc.
- The availability and transparency of cyclical compliance data is fundamental to understanding risks arising from asset management such as asbestos, fire, legionella, gas safety, electrical inspection etc.

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- The progress to collect, collate, report and analyse these types of information has been instrumental in driving openness and improving the management of a wide range of risks, however, the process of collecting this information needs to be slicker and in real time
- With the implementation of HomeMaster, there are opportunities to further improve and simplify the collection, collation and availability of all data and performance information

To further advance this objective we will:

- Utilise H&S expertise both internally and externally at key stages of the specifying and planning for a new piece of H&S reporting software
- Confirm and/or achieve the compatibility of both existing and new IT systems that hold critical H&S information (including Service Connect, People HR and HomeMaster)
- Achieve an integrated approach to H&S, fire and environmental risk information as it passes through the development, asset management and repairs life cycle of our homes
- Define and apply an ELHA wide system of document control for all H&S and other associated documentation including dates, versions and editorial permissions

3.4. Objective 4 – Make H&S Everyone's Business

Making H&S "everyone's business" involves creating a shared sense of responsibility, embedding safety into organisational culture, and empowering all employees to actively participate.

Housing is a complex service organisation with a wide range of stakeholders including tenants, customers, employees, contractors and other partner organisations. All these different stakeholders present different H&S risks and perspectives that require managing. Responsibility for H&S is critically important for several reasons, spanning ethical, legal, financial and operational services.

Protecting Lives and Well-being

- **Moral Responsibility:** Every individual has the right to work and live in an environment where their H&S are protected, and ensuring this reflects our commitment to valuing our people, tenants and other service users and stakeholders
- **Preventing Harm:** Effective H&S measures reduce the risk of injuries, illnesses, and fatalities, protecting employees, tenants, other service users, and the wider public
- **Mental Health:** A safe environment includes psychological safety, which reduces stress, anxiety, and workplace-related mental health issues

Legal and Regulatory Compliance

- **Avoiding Penalties:** Non-compliance with H&S laws can result in heavy fines, legal actions (for employer and employee), or Improvement / Prohibition notices
- **Reputation Management:** Legal infractions can damage our reputation, affecting relationships with tenants and stakeholders

All employees should have a vested interest in good H&S with managers taking a lead and setting an example. Staff with H&S expertise should provide leadership, direction, advice and support performance monitoring.

The actions of all employees are critical in ensuring the H&S of all stakeholders, particularly those employees working directly with tenants. We rely on a wide range of contractors to provide routine and planned inspection and maintenance. Many of these contracted services enable us to achieve legal compliance, so the careful management and monitoring of these activities is essential. The development of new homes and the improvement of existing housing stock provides an opportunity to improve future H&S standards.

For H&S management to be successful it is necessary for all stakeholders to play their part and therefore H&S is everyone's business. To achieve this objective, we will:

- Create H&S champions in each area of the organisation
- Encourage all employees to constructively challenge ways of working, to effectively manage and improve H&S and reduce associated risks
- Ensure all new customer initiatives and services are properly risk assessed prior to launch and have H&S as a key principle
- Consider customer groups, particularly vulnerable groups, in the assessment and management of risks
- Improve all aspects of H&S management for all contractors, including selection, service delivery, value for money, information sharing and management on site
- Ensure H&S is on the agenda in all interactions and communications with partnering organisations
- Set clear and measurable H&S standards for contractors and partners to meet and maintain
- Provide regular communications on H&S, fire and environmental issues to employees and tenants

4.0 Roles and Responsibilities

The Association subscribes to the EVH H&S Control Manual. This is a comprehensive document which provides guidance on all aspects of H&S matters relative to our business. Included within the Control Manual, at Section 1.4, is a H&S Organogram, which is kept up to date in this document, and kept under review by the H&S Committee. The document also sets out the following responsibilities in more detail within the noted sections:

- Section 1.5 ELHA Board
- Section 1.6 Chief Executive
- Section 1.7 Directors & Departmental Managers
- Section 1.8 Employees
- Section 1.9 H&S Committee

A copy of the H&S Control Manual is available at: [H&S Control Manual](#)

5.0 Related Legislative and Statutory Framework

Below is a list of related Acts, Regulations and Policies that should be referred to:

- Health & Safety at Work etc Act 1974
- The Management of Health and Safety Work Regulations (2006 amendment & 1999)
- The Corporate Manslaughter and Corporate Homicide Act 2007
- All Statutory Regulations, Directives and Approved Codes of Practice
- Asbestos Management Policy
- Code of Conduct for Staff
- Damp and Mould Policy
- Disciplinary Policy
- Lone Working Policy
- Privacy Policy
- Vulnerable Customer Policy

We will meet all legal obligations and comply with legislation in relation to H&S.

6.0 Risk Management

We recognise that risks exist in the delivery of this strategy. As part of our approach to risk management, our policies and procedures are developed and considered to support H&S matters and regulatory compliance.

This Strategy is a key operational control in the (new) Corporate Risk Management Arrangements, as it is fundamental to successful risk management at strategic and operational levels. Our Corporate Risk Panel meets four times a year and is chaired by the Chief Executive.

7.0 Implementation, Monitoring, Reviewing and Reporting

This strategy will be subject to our Performance Monitoring Framework for monitoring and review, and to ensure progress and flexibility to respond to new and emerging needs. The four key objectives that make up this strategy will be implemented and progressed over the next three years.

Quarterly reports on progress are provided by each directorate through the H&S Committee. An annual report of progress against the strategy will be made to the ELHA Board.

8.0 Strategy Review

This Strategy complies with all relevant law and best practice and will be reviewed if any changes necessitate an early review.

The Chief Executive will review the H&S Strategy every three years, and any changes will be submitted to the ELHA Board for approval.