



STRATEGY DOCUMENT

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1. Introduction

Message from the Group Chief Executive, Jacqui De Rose

At Progress Housing Group we really care about health and safety, doing all that is reasonably practicable to ensure that statutory requirements and property compliance obligations are fully met. We aim to make sure our colleagues, tenants and customers are safe, and our partners and other stakeholders trust us.

Nationally, this is a time of great challenge for housing associations, with increased expectations regarding health and safety placed on social housing landlords and a sharpened focus on effective and transparent health and safety management, driven by the lessons learned from the Grenfell Tower Inquiry and the Hackitt Review.

We are looking to build on our strong foundations, embedding the benefits of a positive safety culture, which has our tenants and customers and colleagues at its heart. Effective health and safety management underpins everything we do and is a fundamental part of us achieving the objectives of our [Strategic Plan and Business Priorities](#).

These objectives can only be achieved effectively in an environment that's both healthy and safe, where a positive safety culture is encouraged, legislative and regulatory compliance is achieved, and our customers and other stakeholders are actively engaged.

Health and Safety Policy Statement of Intent

Progress Housing Group fully acknowledges that successful health and safety management contributes to the overall performance of the Group and that it makes good business sense. The Group is committed to complying with all relevant health and safety legislation applicable to its undertaking, including as an employer, a provider of services and a social landlord, and to the continuous improvement of health and safety performance.

The Group is committed to promoting a positive health and safety culture and to the health and safety of its colleagues and others affected by its undertaking, including tenants, customers, communities, contractors and partners and will do all that is reasonably practicable to reduce risk, prevent harm and ensure that safe working practices are adopted. This commitment is implicit within our vision and values and shown through associated risk assessments, related policies, procedures, guidance and other operational control measures.

The Group will ensure that all necessary resources are made available to implement this strategy effectively and achieve these commitments through its [Health and](#)

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[Safety Policy](#) and improvement plans, and will act swiftly to resolve any concerns or issues that may be raised in relation to any other health and safety matter.

2. Aims of the strategy

The Group is at all times committed to the highest levels of controls to ensure the health and safety of its customers, colleagues and the public. We are committed to continuous improvement of our health and safety management, providing a safe and healthy environment for our colleagues, tenants and customers, and recognising the impact our work may have on others.

The Group has a diverse risk profile which includes six business streams; this strategy provides the roadmap to ensure our approach to health and safety management reflects this broad risk profile and the diversity of our people. It outlines how we will build on our existing robust systems to deliver sector leading performance over the next three years and beyond.

Effectively managing health and safety brings real benefits, including:

- fewer injured colleagues, tenants, customers and partners
- improved colleagues wellbeing, with lower levels of lost working time, improving our efficiency
- an enhanced reputation and viability as an employer and partner
- delivering better value for money by reducing costs from legal claims and/or enforcement action, and securing lower insurance premiums.

With our specialist in-house Health and Safety and Property Compliance teams, we are well placed to support our people, by providing competent advice, developing our systems and monitoring compliance.

3. Where are we now?

The Group has a [Risk Strategy](#) and [Risk Policy](#) which define the Group's risk appetite and risk management framework and strategic and operational risk registers are in place; all of which include health and safety risk.

The health and safety of colleagues, tenants and customers a key priority for the Group. It is acknowledged that failures in property compliance or general health and safety breaches could put people at harm. The Group has invested in both of these areas by employing specialist skills and procuring specialist IT systems to help manage important data.

The Health and Safety Steering Group oversees health and safety performance and reviews internal or external impacts and drivers which may affect the management of health and safety within the Group; this includes any (proposed) changes to health and safety related legislation, guidance or best practice. A regular report is prepared to provide an update, as applicable, of any (potential) impact on the Group's:

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- Health and safety universe, including property compliance
- Health and safety related risk maps
- Health and safety and property compliance improvement plans
- Health and safety related resources and budgetary requirements.

Action is taken, as necessary, which is proportionate to the risks involved and to ensure that regulatory compliance can be achieved or maintained as a minimum. Matters are escalated to the Executive or Board as required, and the Group's risk registers are updated as applicable.

The Group maintains two sources of external validation for its health and safety management and performance:

- CHAS accreditation
- RoSPA award.

Review of the internal environment

The Group utilises the 'three lines of defence' model to provide assurance on risk, including health and safety. In 2020 an internal audit of employer health and safety management was undertaken, which provided substantial assurance.

Board also takes an active role in overseeing health and safety performance and governance. It established two working parties to review health and safety and business continuity management following the Grenfell Tower tragedy in June 2017, and the Group's approach to health and safety and property compliance in July 2019. Their recommendations have been adopted to facilitate continuous improvement.

The Health and Safety Steering Group approves a regular health and safety improvement plan and during 2020/22, successful progress was made to enhance our arrangements and support the continuing development of our safety culture, including the procurement and/or development of three IT systems for training, corporate health and safety management and property compliance, as well as the enhanced provision of in-depth assessments and procedures for higher risk activities and refreshed key performance indicators.

The health and safety operational improvement plan for 2022/23 supports this new strategy, taking forward its strategic objectives and actions include developing a refined Health and Safety Policy and refreshed procedures for training, accident reporting and risk assessment, as well as embedding recent procedural changes and achieving full implementation of the IT systems, whilst supporting the introduction and successful achievement of the six new business stream plans.

Review of the external environment

The health and safety universe is a grouping of all external health and safety requirements that impact the Group, to help prioritise risk, support the development

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of improvement plans and oversee the effectiveness of arrangements. It is regularly reviewed and updated by the Health and Safety Steering Group to reflect changes and emerging risks and most recently, this has focused on identifying and responding to (proposed) legislative changes from the Fire Safety Act and Building Safety Act 2022, including reviewing the approach towards on-site premises information and premises inspection arrangements.

Each year the Group participates in two sources of external validation and in 2020 an independent review of health and safety management was also undertaken, which provided substantial assurance. Property Compliance has also been externally reviewed and following delivery of a continuous improvement roadmap, this area also achieved substantial assurance in 2021.

The Group holds 'V1' and 'G1' gradings with the Regulator of Social Housing, which includes satisfying its governance requirements for health and safety and property compliance.

4. What do we need to do to achieve our aims?

Effective health and safety management is a key component of our ability to provide and maintain great homes and excellent services. Successfully delivering this strategy will require buy in from colleagues at all levels, and their willingness to be receptive to feedback, learn from others and work collaboratively with colleagues, partners, tenants and customers.

We've identified **four strategic health and safety objectives** that underpin this strategy:

1. Embedding a positive health and safety culture

At Progress Housing Group, health and safety is led from the top with active and visible leadership. Our Health and Safety Policy, signed by our Chief Executive, identifies who has overall accountability and responsibility for health and safety. The Group is committed to ensuring health and safety and property compliance is embedded in all areas of the business. It will strive to continuously improve the attitudes, perceptions, competences and behaviours determining commitment to achieving excellent health and safety performance. We will make sure:

- managers and colleagues are supported in achieving the right levels of competency to lead effectively and carry out their work safely
- colleagues understand what's expected of them in terms of health and safety and property compliance, and are consulted on new ways of working and risk reduction measures

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- health and safety and property compliance is seen as both a collective and individual responsibility, with colleagues taking ownership for the risks created by their work
- we encourage colleagues to report issues, without blame, so we can learn lessons from incidents and near misses to improve the way we work
- we regularly measure our safety climate to understand how colleagues feel about health and safety and facilitate further improvement.

2. Delivering good health and safety performance across all our business streams

Good health and safety performance is more than complying with the law – it's demonstrating best practice in the way we treat our people and others and avoiding the potential for serious harm. It's about having a sensible and proportionate approach to health and safety risk that enables safe innovation and adopting working practices that encourage colleagues to contribute and challenge creatively.

Our colleagues

Our colleagues are the key to our success. We will ensure our approach to health and safety isn't a barrier to doing a great job. To achieve this, we will:

- provide safe working environments and prioritise colleagues welfare and wellbeing when adapting, moving or creating new workspaces
- develop procedures, guidance and operational working practices that make it easy for colleagues to work safely
- enhance communication and consultation on health and safety matters with colleagues, providing targeted information through a range of media
- make sure our training goes beyond legal compliance, supporting and inspiring managers and colleagues to take ownership of risks.

Our tenants and customers

We will regularly engage with tenants and customers and ensure our ways of working protect them and their visitors from risks to their health and safety wherever possible. To achieve this, we will make sure:

- our homes meet health and safety legislation relating to property compliance, including fire safety, asbestos, gas safety, water hygiene, lifts and lifting equipment and electrical safety
- those working on our behalf in our homes are competent to do so, and monitor their work to make sure risks to tenants and their visitors are minimised

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- sensible health and safety risk management is a key component of planning events run for, or in conjunction with tenants and customers
- we enhance arrangements for tenant engagement on health and safety matters
- we encourage feedback from tenants and customers, and that we are listening to and acting on feedback from them
- health and safety information we provide for tenants and customers is clear and helpful, enabling them to minimise risks when using services and/or living in their homes.

Our partners

We will select and monitor contractors to ensure they deliver services to our own high standards. We will work with them to make sure the risks from their work are well controlled. To achieve this, we will:

- help embed the Group's standardised approach to contract management, ensuring health and safety standards for those working on our behalf are achieved and all property compliance contractors are accredited to relevant standards
- help colleagues engage and monitor contractors effectively, through our Contract Management Policy and Construction Design and Management (CDM) Procedure.

3. Delivering a robust, user friendly health and safety management system

Our Health and Safety Policy sets our systematic approach to health and safety management. It aligns with the HSE's 'Plan, Do, Check, Act' approach. It establishes health and safety as part of good management – not an 'add-on'. It recognises the need for balance between systems and management behaviour. To achieve this, we will:

- continue to develop our health and safety related IT systems to deliver our management arrangements and property compliance, simplify processes and maximise efficiency
- actively manage our risks and maintain our risk registers and comprehensive risk assessments
- refine our health and safety policy and refresh our procedures and guidance, to provide clear and practicable operational tools
- align and embed health and safety management across all six business streams
- actively engage and listen to colleagues at all opportunities, attend team meetings and support them to achieve appropriate and practical control measures

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- actively engage with our tenants and customers, and listen to them at all opportunities; reviewing our working practices accordingly.

4. Providing assurance We are legally compliant and managing our health and safety risks effectively

We will strengthen the ways we check our performance, using our resources effectively to support and assist our people to deliver great health and safety performance at all levels. To achieve this, we will:

- maintain our programmes of internal health and safety assessments and inspections and develop thematic health and safety audits across the six business streams
- maintain our sources of external validation and consolidate our best practice approach in line with the spirit of the ISO 45001 standards
- maintain our Primary Authority Agreement with the Fire and Rescue Service to ensure we continue to standardise our fire safety arrangements and can respond in a professional and timely manner to the lessons learned from the Grenfell Tower tragedy
- maintain our suite of key performance indicators (KPIs) and scorecards linked to the main areas of risk to our colleagues, customers and partners, reviewing them regularly to ensure they remain relevant
- take swift action to correct any serious issues or underperformance
- regularly report on performance at the Health and Safety Committee, Health and Safety Steering Group, Executive and Board.
- benchmark with other registered providers to compare performance, provide better insight and learning and facilitate sector leading performance.

These objectives and actions will map our approach until the end of March 2025, driven by the health and safety improvement plan 2022/23, and monitored by the Health and Safety Steering Group. Progress on its achievement will be regularly reported to Board. Collectively this will enable us to achieve a mature and robust health and safety management framework and culture across the business.