

# **Group OH&S Policy**



## **EXECUTIVE SUMMARY**

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## 1 Management Control and Scope

To ensure compliance with all legal and other requirements, (including the Health and Safety at Work etc. Act 1974, our Health and Safety Statement of Intent, policy notes and our organisational responsibilities and arrangements) Land Securities' health and safety documentation will be reviewed periodically as appropriate. Additional supporting policies and procedures are readily available to all employees and can be found within the Company's Knowledge Library.

The Group Chief Executive (GCE) is nominated as the Board Director responsible for health and safety. Together with the Group Head of Health and Safety, the GCE will review this policy and associated safety management systems and make arrangements for amendments as necessary.

Policy Title	tle Group OH&S Policy					
No. of pages	12					
Policy No. 02	Date of review	Brief description of changes	Author	Reviewers	Approver	Issue date
	March 2020	Policy review following changes in management structure and	Olivia Lynch	Alex Hodson	Mark Allan	11 <sup>th</sup> March 2020
	April/M ay 2021	Policy review following changes in health and safety	Olivia Lynch	Alex Hodson	Mark Allan	May 2021
	June 2022	Minor wording changes for clarity and alignment to	Olivia Lynch	Alex Hodson	Mark Allan	July 2022
	October 2022	Chief Operating Officer signature updated to Group	Olivia Lynch	Alex Hodson	Mark Allan	October 2022
	April 2023	Updated OH&S Objectives and KPI's for the business, governance structure and hyperlinks	Olivia Lynch	Alex Hodson	Mark Allan	August 2023

#### Policy Reviews in prior 3 years

# Scope

The scope of this policy covers all Occupational Health and Safety (OH&S) management arrangements for Land Securities Group PLC (the "Company"). This policy provides a framework, which defines how the Company will manage OH&S throughout its operations. These operations include the management of all our properties throughout the UK including sales and acquisitions, development of new and existing properties, and the day-to-day operation of building environments by our staff. Also included are joint venture properties where we are responsible for their asset management and all offices occupied by Landsec itself.

This policy provides the foundation for the implementation of Land Securities ISO:45001 OH&S Management System. This policy will be made readily available to any interested party.

The Group Health and Safety team will establish, document, implement, maintain, and continually improve the OH&S management system. This will enable the Company to develop, independently verify, and maintain certification to our ISO:45001 OH&S Management System.

# 2 Group OH&S Policy Statement

At Landsec, we believe that the successful management of health and safety is critical to our employees, contractors, service partners, occupiers and visitors to our properties. It's also one of the ways we create a better working environment and is essential to our continued success and growth.

# We are committed to:

- providing safe and healthy working conditions for the prevention of work-related injuries and ill-health
- the fulfilment of our legal requirements and other requirements
- the provision of safe and healthy places of work, safe systems of work, safe plant, safe equipment, and safe machinery
- identifying and wherever possible eliminating significant hazards, and managing their associated risks
- the continual improvement of our OH&S management system
- being an example of best practice in the practical application of health and safety management

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- ensuring that health and safety is integral to the way we do business

To achieve this, we will:

- provide a framework for setting the occupational health and safety (OH&S) objectives through internal audit and management review
- consult with and encourage participation from our employees, their representatives,
- contractors, and service partners
- only assign employees and contractors work that they are competent to do
- appoint competent health and safety assistance
- provide information and the appropriate training and instruction relevant to specific job roles
- encourage good communication and co-operation
- regularly review our health and safety performance

To demonstrate this, the Board is committed to providing adequate resources to:

- enable this policy to be implemented, developed, monitored, and reviewed
- fulfil our legal requirements and other requirements
- set occupational health and safety objectives

We will endeavor to enhance our employee's wellbeing and take steps to prevent work having a negative impact on their physical and mental health. We will achieve this by providing appropriate occupational health, wellness, and wellbeing services (note: these are developed and provided by the Human Resources team).

All employees should acknowledge their duty and responsibility to take reasonable care at work to prevent injuries to themselves, fellow employees, and members of the public, and to contribute to the promotion of our positive health and safety culture.

Mark Allan

Group Chief Executive August 2023

Other related policies

The following policies have been developed and form part of this policy document.

- 1. Landsec Group Asbestos Policy
- 2. Landsec Group Fire Safety Policy
- 3 Group Health and Safety
- 3.1 Framework for setting OH&S Objectives

Annually the Group Head of Health & Safety will propose a number of OH&S objectives and associated performance measures. The Health, Safety and Security Committee, and the Executive Leadership Team are consulted and approve the proposals.

## 3.2 OH&S Objectives and KRIs

The OH&S Objectives and KPI's for the business are set out below:

L	Landsec - Our Health & Safety Strategy
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Health & Safety	Mission To deliver Landsec's purpose without causing harm to peo	Dur strategy

Main business H&S risks	Objective	Performance Indicator	
Fire	Obtain EWS1 certificates for all remaining in-scope high-rise and mid-rise residential buildings.	EWS1 certificates issued for Ariadne and Roundhouse (Berkeley Homes to remediate under their obligations with their Developers' Pledge).	
	Anticipate the impacts of the forthcoming fire safety act and prepare/ready the business for its implementation	The enactment of the fire safety act causes no significant business disruption / interruption. E.g. progression through gateways	
	Maintain certification to BS:9997	No major non-conformances found by external auditor during surveillance audits	
Inadequate assurance of H&S risk controls	Deliver the full programme of Targeted Safety Improvement Reviews: risk registers, permit to work, asbestos, fire safety, and façade projects.	Programme of TSIRs completed and reports issued within programmed timescales.	
	Maintain certification to ISO 45001:2018 (the standard for H&S management systems)	ISO 45001 certification is maintained following each surveillance or re-certification audit by 3 <sup>rd</sup> party auditor	
Business as usual	Maintain a competent, effective, and adaptable H&S core service	Continual improvement measured via metrics, presence of effective risk management controls, positive stakeholder feedback	
Acquisitions & integrations	Ensure that acquisitions are integrated effectively into the business, and that the lessons learned from the U+I acquisition are applied.	New acquisitions can prove legal compliance for their assets.	
Data maturity and data insight	Explore new ways of using our H&S data to provide better insight and foresight.	Inclusion of new or improved data uses within our regularly produced reports.	

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## 3.3 Risk assessment and control

Click here to go to the Risk Assessment Procedure and templates

3.4 Commitment to continual improvement

The Group Chief Executive has delegated accountability for Health & Safety on behalf of the Board and is committed to ensuring health and safety standards are maintained and continually improved. This is achieved by the setting and implementation of stretching annual OH&S objectives. The achievement of these objectives is monitored via KPIs, using a mix of leading and lagging indicators. We will also look to continuously improve our Health and Safety performance, practices and culture using lessons learned from our own incidents and others in the property management and development sectors.

3.5 Commitment to appropriate resources

The Board will ensure through the Group Chief Executive, as Board Director for Health and Safety, that sufficient and appropriate resources for the delivery of health and safety are in place within the Company.

3.6 Training

We are committed to providing all necessary information, and the appropriate training and instruction relevant to specific job roles. Click here for our <u>Training</u> <u>Policy</u>.

3.7 Monitoring and Auditing

We have established, implemented, and maintain a process for monitoring, measurement, analysis, and performance evaluation. Click <u>here</u> for details of our monitoring and auditing procedure.

# 3.8 Accident and incident management

We have developed a One Best Way guidance document for incident reporting, including near misses. This standard identifies the mandatory requirements expected of Landsec employees in relation to the reporting of health and safety incidents. Click<u>here</u> for more details.

#### 3.9 Emergency preparedness

Plans and procedures for responding to emergency situations are periodically tested and reviewed. Click<u>here</u> for more details.

# 3.10 Fire risk management

We operate a fire risk management system certified to the British Standard BS9997, demonstrating our commitment to providing a safe environment for its employees, contractors service partners, occupiers, and visitors in line with the Regulatory Reform (Fire Safety) Order 2005 and the Fire Safety (Scotland) Act 2005. Click here for Landsec Group Fire Policy.

# 3.11 The Construction (Design Management) Regulations 2015

The management of construction and related works within the Company will be discharged through the appropriate business departments, with the support and commitment from the respective Board Directors and Group Health and Safety. Click <u>here</u> for more details.

## 3.12 Client duties

The Company accepts that it is accountable for the impact it has on health and safety standards and is fully aware of its duties as a client under CDM. Click<u>here</u> for more information on client duties.

## 3.13 Tender – provision of health and safety information

The Company will provide adequate health and safety information on the scope of proposed contracts where applicable and allocate sufficient time and resources for the tender process. Click<u>here</u> for more details on contractor management.

## 3.14 Contractor Management

The Company aims to provide clear guidelines to contractors to enable adequate planning before contractors are invited to work on Company controlled premises. Click <u>here</u> to find out more details on contractor management.

#### 3.15 Managing agents

Managing Agents that have been contracted to manage property on behalf of Landsec will be responsible for managing health and safety within the common parts of those properties. The exact boundaries of control between Occupiers and the Managing Agent will be clearly defined within the occupiers' leases.

#### 3.16 Asbestos management

We operate a robust system with regards to the management of asbestos, which is coordinated by the Landsec Health and Safety Team. Click<u>here</u> to view Landsec Asbestos Policy and click<u>here</u> to view Landsec asbestos procedures.

# 3.17 Health and Safety Management System Review

We operate an H&SMS, certified to the international standards ISO:45001 and BS9997:2019. The company carries out internal audits and combined Management Reviews to ensure that the H&SMS and FRM continues to meet the requirements of the standards and delivers improvements in H&S performance. Click <u>here</u> for more details on internal Audit and <u>here</u> for more details on Management Review process.

#### 3.18 Occupational health and wellbeing

The Company as an Employer of Choice recognises the importance of the physical and mental health, as well as the wellbeing of its employees. The Company acknowledges that the successful management of its business relies on its ability to recognise, predict, and adapt to the changing demands on its people. Occupational

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health & wellbeing is managed by the Human Resources team. Click<u>here</u> to view our occupational health and wellbeing arrangements.

# 4 Structure, Governance, Responsibilities and Consultation / Communication

4.1 Organisational Structure

Click<u>here</u> to view our H&S Governance Structure.

**Group Chief Executive** 

Accountability for H&S

**Executive Leadership Team** H&S Accountable and Governance Responsibilities

Management Responsibility for day-day H&S

#### All Employees

Under Section 7 of the HSAWA employees have a duty to take reasonable care for the health and safety of themselves and other persons who may be affected by his acts or omissions at work; co-operate with Landsec as an employee and not interfere with or obstruct anything provided in the interests of health & safety at work Health & Safety Team Provide H&S Advice and Guidance

**Risk & Audit Team** Provide assurance on controls and governance

#### 4.2 Governance

In the interest of maintaining a high level of internal control in respect of health and safety management, the Company will ensure that the governance and organisational structure outlined in 4.1 above will be maintained (unless the Board determines otherwise).

#### 4.3 Roles and responsibilities

Both general and specific health, safety and fire risk management roles and responsibilities are documented <u>here</u>. Notwithstanding the responsibilities and roles outlined within this policy, the Company may also include specific responsibilities within Job Descriptions and health and safety policies and procedures. Where such additional responsibilities arise, the Company will communicate this to individuals, and provide suitable and sufficient information, instruction, and training.

4.4 Consultation and participation of workers

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Click<u>here</u> for details on Consultation and participation of workers.

# 5 Arrangements

# 5.1 Knowledge Library

To discharge effectively the statement of intent and the policy, the business has implemented and continues to maintain ISO 45001 Occupational health and safety management system and BS9997:2019 Fire Risk Management System certification to address the risks associated with our activities and ensure a consistent approach.

Document control is managed through the Knowledge Library and the external One Best Way (OBW) portal. Any document downloaded and/or printed from the Knowledge Library and external OBW portal is considered uncontrolled. Regular reference should be made to the Knowledge Library and external OBW portal to ensure that the latest information is being utilised. It is strongly recommended that any pages regularly visited are saved as 'favourites'.

H&S records for operational assets are held on Riskwise or at the property in question. Records of H&S data are submitted by the site management team and analysed by Landsec H&S team. Applicable records will be retained in accordance with legal requirements, as minimum.

The Landsec records maintenance processes ensure that records remain legible, identifiable, and traceable to the relevant activity.

A SharePoint site has also been specifically set up for the H&S team with restricted access to hold all H&S documentation records. The Health and Safety Team are always available to provide competent H&S guidance, assurance, and assistance as appropriate.

5.2 Health and safety document structure

The Company OH&S Policy Statement of Intent Objectives/KRI's

> Specific Policies Asbestos Fire Safety

The Company OH&S Management System held on the SharePoint knowledge library site along with Policies, Procedures and One Best Way Health & Safety Standards

These are the Management procedures necessary to achieve the objectives set out in the OH&S Policy. Health and Safety procedures will apply across the Group and where appropriate these may be incorporated into other business procedures e.g. Human Resources and Procurement.