



# Safety, Health and Environmental Policy

April 2021

**Realm**



# CONTENTS

1. Introduction
2. Policy Statement
3. Organisational Chart
4. Organisational Responsibilities
5. Planning
6. Implementation & Operational Control
7. Checking

# 1. Introduction

Realm's Safety, Health and Environmental Management System (SHE) describes our strategy for managing our health and safety risks together with our environmental aspects and lays down the foundation for continuous improvement. This SHE system sets out our vision, objectives and priorities for effectively managing our health, safety and environmental obligations. Following these policies ensures that Realm fulfils its responsibility to our clients, stakeholders, occupiers, local community and future generations through the protection of assets, staff, tenants, clients, the public and the environment and also ensures our statutory compliance.

Our SHE Management System comprises five documents:

1. Realm Health, Safety and Environmental Policy

*Provides a framework for effectively managing our health and safety risks together with our environmental aspects and impacts.*

2. Policy and Practice Guidance Manual

*Provides policy, procedures and guidance instructions for the effective management of our significant risks and aspects.*

3. Legal Register

*Identifies all current applicable legislation*

4. Risk and Environmental Assessments

*Provides a site specific platform for the evaluation of risk, evaluation of legal compliance and for the measuring and monitoring of SHE performance at each of our managed properties.*

5. SHE Forms and Checklist

# 2. SHE Policy Statement

## Vision

Realm is an independent company specialising in the development and asset management of retail property. The directors of Realm acknowledge and accept their statutory responsibilities for securing the health, safety and welfare of our employees, of visitors to our premises, and of all others affected by our activities. We also recognise that our activities and services have environment risks and opportunities. Our policy is to minimise these risks and maximise opportunities. We are committed to the responsible management of all our risks and opportunities and to the concept of continuous improvement through the setting and achieving of objectives.

## Objectives

- Promote SHE initiatives, legislation and best practice.
- Comply with legislation and all other requirements including client obligations pertinent to the organisation's health, safety and environmental risks and opportunities.
- Minimise the number of accidents, incidents, occupational ill-health and near misses with an aim of an accident/incident free environment.
- Ensure that SHE performance considerations are integrated into all of our business activities.
- Ensure that sustainability and life cycle considerations are integrated into all projects.
- Identify through risk assessment all of our business activities that pose a significant risk to the environment, health, safety and welfare.
- Provide work equipment which is maintained in a safe condition and is suitable for the task.
- Establish safe working procedures.
- Ensure all employees receive encouragement, information, training and support to enable them to carry out their work with regard for their own and others' safety and the environment.
- Reduce energy consumption and promote the use of green energy.
- Minimise wastage and promote the use of sustainable materials.
- Prevent pollution and contamination
- Improve and increase recycling; Realm's target is 'zero to landfill'.
- Engage with responsible suppliers and contractors who share our vision
- Install and use sustainable energy wherever feasible.

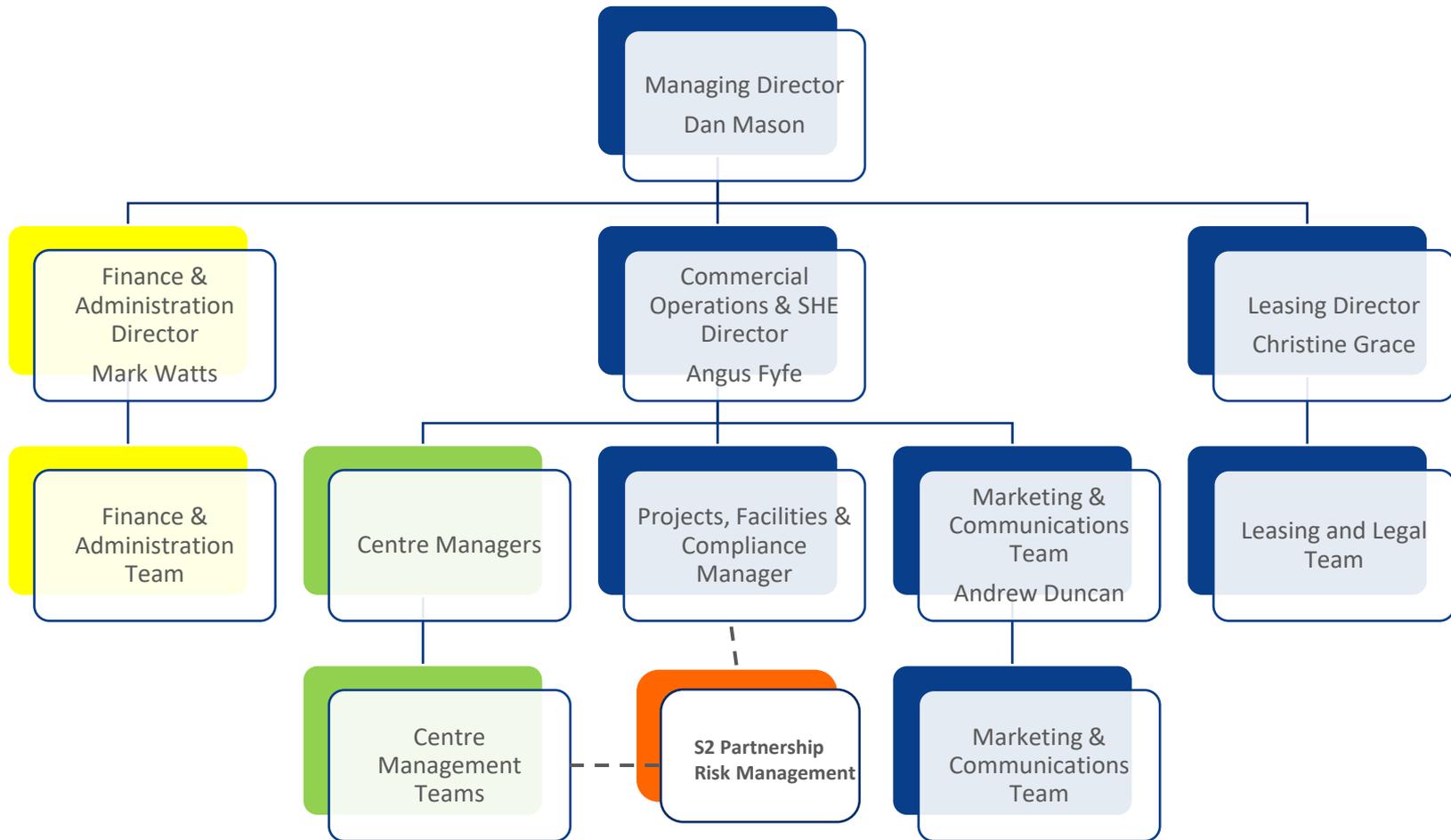
Signed



Date: April 2021



# 3. Organisational Chart



# 4. Organisational Responsibilities

## Directors

- To promote a culture in which Safety, Health and Environmental (SHE) management is recognised, valued and demonstrates commitment to continual improvement
- To make provision for adequate resources to ensure SHE compliance throughout each level of the business
- To respond appropriately to SHE performance data provided to the board
- To ensure compliance with any specific SHE obligations arise from client and lease obligations

# 4. Organisational Responsibilities

## Commercial Operations & SHE Director

- Responsibility for SHE compliance across the business
- To make provision for adequate resources to establish, implement and review the Realm SHE management system at all levels of the organisation
- To oversee the SHE activities delegated to the Projects, Facilities & Compliance Manager
- To monitor the activities of the Centre Management Teams
- To provide SHE performance data to the board of directors

# 4. Organisational Responsibilities

## Projects, Facilities & Compliance Manager

- Overall responsibility for projects carried out under the Construction Design and Management Regulations (CDM) and other applicable SHE legislation
- To oversee the appointment and competence of contractors appointed by the Realm development team who carry out capital & refurbishment projects
- To liaise with external enforcement agencies and public bodies as required
- To communicate the SHE Policy statement, objectives and targets to all stakeholders and occupiers via our SHE Focus Group, Realm HUB, e-mails and via RiskWise
- To ensure that legal and client obligations are taken into account in establishing, implementing and maintaining the SHE management system
- To monitor events, inspections and, risk and opportunity improvement actions arising from the annual risk assessments and statutory inspections are effectively tracked through RiskWise in a timely manner
- To carry out 6 monthly compliance audits at each Centre
- To complete an annual review of the Corporate SHE Policy and Practice Manual
- To maintain the effectiveness and adherence of the SHE management system in accordance with the requirements of ISO14001 and ISO45001
- To monitor corrective actions arising from audits and assessments to identify commonality / trends and establish additional controls or actions where deemed necessary
- To monitor SHE training for directors and employees
- To report regularly to the Board on SHE performance

# 4. Organisational Responsibilities

## Managers (including Centre Managers)

- To understand the Safety, Health & Environmental (SHE) policy and appreciate their responsibilities
- To promote a positive culture within their teams in which SHE management is recognised, valued and demonstrates commitment to continual improvement
- Any health & safety objectives highlighted through risk assessment are met and standards are monitored within their area of responsibility
- Employees in their area of responsibility are provided with a working environment that is, as far as possible, safe and without risk to health, with adequate facilities and arrangements for welfare at work
- Training, supervision, instruction and information is provided to employees in health & safety procedures and policies, as necessary
- Immediate and appropriate steps are taken to investigate and deal with any risks to health & safety arising from work activities in their area of responsibility
- Any health & safety issues are brought to the immediate attention of senior management, as necessary.
- All accidents and near misses are properly recorded and reported and an investigation is carried out to identify the causes
- Safe access to and from the workplace is maintained at all times
- All employees receive adequate and appropriate environmental, health & safety training in their tasks

# 4. Organisational Responsibilities

## Employees

- To understand the SHE policy and appreciate their responsibilities
- To follow the requirements of the SHE Policy & Practice manual as applicable to their role
- To co-operate with other Realm employees on all aspects of SHE management
- Not to put themselves or other people at risk through their actions or failure to act
- Not to misuse or interfere with anything that has been provided for SHE purposes
- Undertake any SHE training required for their role and as instructed by the line manager
- Advise their line manager about any change to their state of health, either temporary or permanent, which might affect their working ability or their suitability to carry out any particular tasks
- Report any accidents, incidents, dangerous occurrences or near miss events at the earliest opportunity and participate in any subsequent investigations

# 4. Organisational Responsibilities

## SHE Focus Group

- To attend the SHE Focus group quarterly meetings
- To identify and assist with the prioritisation of SHE issues
- To promote SHE initiatives and best practice across Realm
- To review the implications of any changes in Health and Safety Legislation
- To review SHE performance within the Centres and Offices including a review of accidents, incidents and near misses
- To agree and support the implementation of changes in working practices, as required
- To establish strong across-centre relationships and foster a collaborative approach
- To comply with the terms of reference of the SHE Focus Group

# 5. SHE Planning

Purpose	To maintain a culture which promotes the highest standards of SHE management. To ensure that all SHE risks, opportunities and impacts are identified and that objectives and targets are set to effectively manage and mitigate the significant risks and impacts.
Scope	All Realm Managed Properties
Accountability	Board of Directors
Responsibility	All staff

5.1 SHE PLANNING PROCEDURES				
REF.	PROCEDURE	RESPONSIBILITY	REVIEW	EVIDENCE
5.1.1	Promote a culture in which SHE management is recognised, valued and demonstrates commitment to continual improvement.	Directors, Managers and all site staff	Annual	<ul style="list-style-type: none"> <li>- SHE Policy</li> <li>- RiskWise</li> <li>- SHE Audits</li> <li>- Site Risk Assessments</li> </ul>
5.1.2	Realm will communicate its Policy Statement, objectives and targets to all stakeholders and occupiers via our website, intranet, e-mail and via RiskWise.	Projects, Facilities & Compliance Manager	Annual	<ul style="list-style-type: none"> <li>- SHE Policy Statement</li> </ul>

# 5. SHE Planning

## 5.1 SHE PLANNING PROCEDURES

REF.	PROCEDURE	RESPONSIBILITY	REVIEW	EVIDENCE
5.1.3	Realm will maintain an up-to-date legal register applicable to our significant risks and impacts.	S <sub>2</sub> Partnership	Annual	- Legal Register
5.1.4	Realm will determine what site specific SHE obligations arise from client and lease obligations.	Director	Annual	- Client Contracts - Leases - Client KPI requirements
5.1.5	Legal and client obligations are taken into account in establishing, implementing and maintaining our SHE management system and are reflected in our objectives, targets and risk control programme.	Projects, Facilities & Compliance Manager, S <sub>2</sub> Partnership, Centre Managers	Annual	- SHE Policy - Health, Safety and Environmental Guidance Manual - Site Assessments - RiskWise
5.1.6	Risk improvement actions resulting from the annual risk assessment will form the basis of our risk control programme and will be tracked and monitored through RiskWise.	Projects, Facilities & Compliance Manager, S <sub>2</sub> Partnership, Centre Managers	Annual	- SHE Policy - Health, Safety and Environmental Guidance Manual - Site Assessments - RiskWise

# 6. Implementation & Operational Control

Purpose To ensure the effective implementation and operation of our SHE management system.

Scope All Realm Managed Properties

Accountability Centre Managers, Projects, Facilities & Compliance Manager

Responsibility All staff

6.1 IMPLEMENTATION & OPERATIONAL PROCEDURES				
REF.	PROCEDURE	RESPONSIBILITY	REVIEW	EVIDENCE
6.1.1	Realm will make provision for adequate resources to establish, implement and review our SHE management system at all levels of the organisation.	Directors and Managers	Annual	
6.1.2	Realm will appoint a representative to ensure that the SHE management system is established, implemented, maintained and regularly reported to the Board.	Projects, Facilities & Compliance Manager	Annual	- Board Minutes
6.1.3	Realm will ensure that staff are competent to perform their duties and that they are aware of the importance of following our SHE Policy and recommendations within risk assessments	Centre Managers	Annual	- Staff Training Records - Contractor Training Records

# 6. Implementation & Operational Control

## 6.1 IMPLEMENTATION & OPERATIONAL PROCEDURES

REF.	PROCEDURE	RESPONSIBILITY	REVIEW	EVIDENCE
6.1.4	SHE awareness training will be provided to Realm employees.	Directors and Managers	Annual	- Staff Training Records.
6.1.5	Realm will ensure that a full suite of Site Specific Risk Assessments are undertaken by a competent contractor. These assessments identify the significant risks, opportunities and impacts and the necessary controls required to mitigate or minimise them.	Centre Managers	Annual	- General Risk Assessment - Fire Risk Assessment - Water Hygiene Risk Assessment - Asbestos Management Surveys - Environmental Assessments
6.1.6	Operations associated with significant risks and impacts will be controlled by following centre procedures, regular briefings and training programmes.	Centre Manager, Centre Staff	6 monthly	- Risk Assessments - Site Briefing Notes - Site Training Records - Site Procedures
6.1.7	All sites will prepare and test emergency response plans to demonstrate effective management during an emergency incident such as: <ul style="list-style-type: none"> <li>• Fire</li> <li>• Flooding</li> <li>• Serious Injury</li> <li>• Spillage/leak</li> </ul>	Centre Manager, Centre Staff	6 monthly	- Emergency Plans - Emergency Preparedness Tests

# 6. Implementation & Operational Control

## 6.2 DOCUMENT AND RECORD CONTROL PROCEDURES

REF.	PROCEDURE	RESPONSIBILITY	REVIEW	EVIDENCE
6.2.1	All SHE documentation will be approved by the Projects, Facilities & Compliance Manager prior to loading onto RiskWise.	Projects, Facilities & Compliance Manager	Annual	<ul style="list-style-type: none"> <li>- SHE Policy</li> <li>- H&amp;S and Environmental Guidance Manual</li> <li>- Legal Register</li> <li>- RiskWise</li> </ul>
6.2.2	All SHE related records will be maintained, stored and readily retrievable either through the Events / Inspection Log on RiskWise or in dedicated files maintained by the Centre Manager.	Centre Manager	Annual	<ul style="list-style-type: none"> <li>- Audits</li> <li>- Inspections</li> <li>- Assessments</li> <li>- Training records</li> <li>- PPMs etc</li> </ul>
6.2.3	All SHE records loaded onto RiskWise will be retained indefinitely and all other records will be maintained for a minimum of 3 years or longer where legislation specifies.	Centre Manager	Annual	<ul style="list-style-type: none"> <li>- Audits</li> <li>- Inspections</li> <li>- Assessments</li> <li>- Training records</li> <li>- PPMs etc</li> </ul>

# 7. Checking and Review

Purpose	To ensure the effectiveness of our SHE management system to achieve our objectives.
Scope	All Realm Managed Properties
Accountability	Directors and Managers
Responsibility	All Staff

## 7.1 CHECKING and REVIEW

REF.	PROCEDURE	RESPONSIBILITY	REVIEW	EVIDENCE
7.1.1	Evaluation of legal compliance is undertaken as part of the risk and environmental assessments undertaken at each Centre by our appointed competent consultants. 6 monthly compliance audits are undertaken at each Centre by the Capital Projects & Facilities Manager.	Centre Manager Projects, Facilities & Compliance Manager	6 monthly or Annual	<ul style="list-style-type: none"> <li>- General Risk Assessment</li> <li>- Fire Risk Assessment</li> <li>- Water Hygiene Risk Assessment</li> <li>- Asbestos Management Surveys</li> <li>- Environmental Assessments</li> <li>- Compliance audits.</li> </ul>
7.1.2	An annual internal audit programme will be established to ensure the effectiveness and adherence to of the SHE management system in accordance with the requirements of ISO14001 and ISO45001. Frequency and location of audits will be based on significant risks and impacts, legal requirements, client obligations and historical evidence stored on RiskWise.	Capital Projects & Facilities Manager	Annual	<ul style="list-style-type: none"> <li>- SHE audit reports</li> </ul>

# 7. Checking and Review

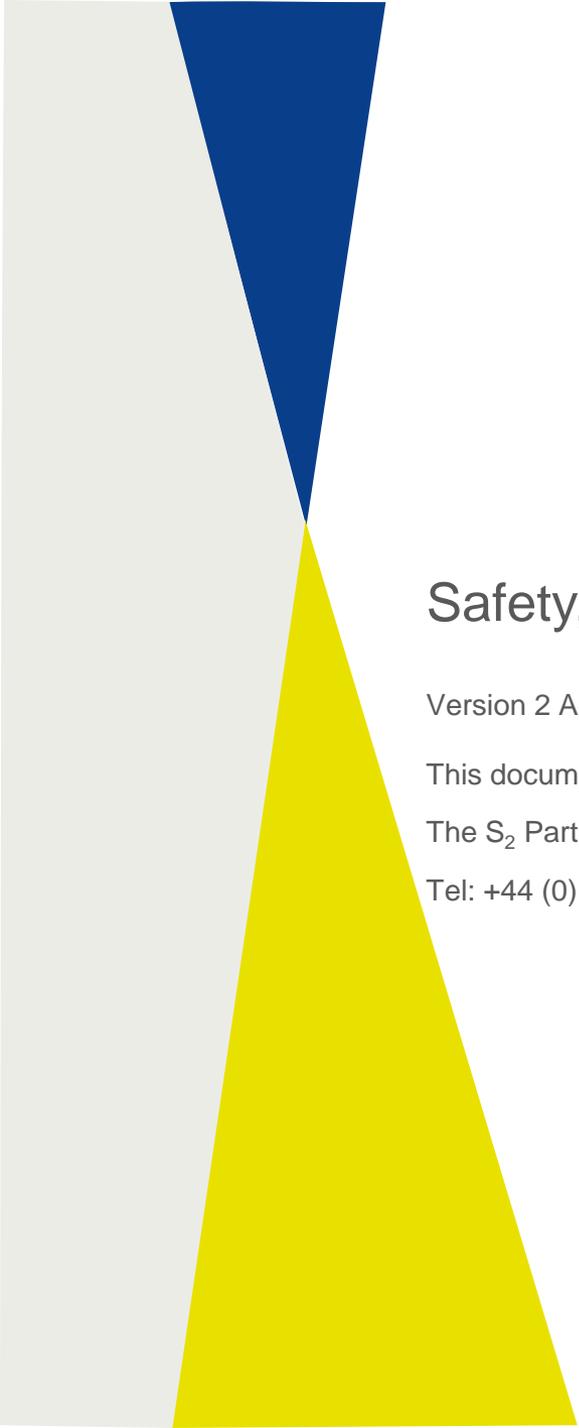
## 7.1 CHECKING and REVIEW

REF.	PROCEDURE	RESPONSIBILITY	REVIEW	EVIDENCE
7.1.3	All risk and opportunity actions and non-conformities identified from the assessments and audits will be logged on RiskWise and monitored through to completion by the appropriate Manager.	Centre Manager	Monthly	- RiskWise
7.1.4	The Capital Projects & Facilities Manager will monitor actions arising from audits and assessments to identify commonality/trends and establish additional controls or actions where deemed necessary.	Projects, Facilities & Compliance Manager	Monthly	- Board Reports
7.1.5	All accidents and incidents will be investigated by members of the management team. All accidents and incidents will be recorded and reported when required via the RiskWise system. All corrective or preventative actions resulting from the investigation will be logged and tracked to completion through RiskWise.	Centre Manager	On going	- Accident / incident records on RiskWise
7.1.6	Site benchmarking will be undertaken across all centres. Benchmarking will be derived from: <ul style="list-style-type: none"> <li>• Site Assessments</li> <li>• Incident/accident rates</li> <li>• Energy, Water and Waste data</li> <li>• Outstanding risk actions</li> </ul>	Centre Managers, Projects, Facilities & Compliance Manager	Monthly	- RiskWise Reports - Board reports - Centre Reports

# 7. Checking and Review

## 7.1 CHECKING and REVIEW

REF.	PROCEDURE	RESPONSIBILITY	REVIEW	EVIDENCE
7.1.7	<p>The SHE Representative will report regularly to the Board on the performance of the SHE system including:</p> <ul style="list-style-type: none"> <li>• audit results</li> <li>• outstanding risk, opportunity and impact actions resulting from risk assessments</li> <li>• communication with external interested parties, including complaints</li> <li>• status of objectives and targets</li> <li>• status of corrective and preventative action</li> <li>• follow-up actions from previous reviews</li> <li>• operational changes including changes to legislation</li> <li>• any recommendations for improvement</li> </ul>	Projects, Facilities & Compliance Manager	Monthly	<ul style="list-style-type: none"> <li>- Board Minutes</li> <li>- RiskWise Reports</li> </ul>
7.1.8	<p>Outcomes from Board meetings shall include any decisions and actions related to possible changes to the SHE policy statement, objectives, &amp; other elements of the SHE management system consistent with continuous improvement.</p>	Board	Monthly	<ul style="list-style-type: none"> <li>- SHE Policy</li> <li>- Legal Register</li> </ul>



# Safety, Health and Environmental Policy (SHE)

Version 2 April 2021

This document was produced in conjunction with:

The S<sub>2</sub> Partnership Ltd., 14-17 Avenue Business Park, Elsworth, Cambridge, CB23 4EY

Tel: +44 (0)1954 267788 [info@s2partnership.co.uk](mailto:info@s2partnership.co.uk)

**Realm**