

# HEALTH & SAFETY POLICY

OCTOBER 2021

C&R

CAPITAL &  
REGIONAL

# CONTENTS

## Part 1:

### Capital and Regional plc

#### Health and Safety Policy Statement & Responsibilities

	<b>Page</b>
1.1 Policy Statement	4
1.2 Introduction and H&S Structure Charts	5-6
1.3 Chief Executive	7
1.4 Board Directors	7
1.5 Company Secretary	7
1.6 All Employees	7
1.7 Review and Publicity of the Policy Statement	7

## Part 2:

### Capital & Regional Property Management Ltd Managed aspects of the business

#### 2.1 Capital & Regional Property Management – support functions for client operating businesses

	<b>Page</b>
2.1.1 Chief Executive	8
2.1.2 Human Resources Support	8
2.1.3 Director of Guest and Customer Experience	9
2.1.4 National Guest Experience Manager	9
2.1.5 Commercial Team	10
2.1.6 Project Management/Development	10
2.1.7 All Central Teams	10
2.1.8 C&R Communication channels	11

#### 2.2 Arrangements for Head Office

	<b>Page</b>
2.2.1 Support Office Manager	12
2.2.2 All employees	13
2.2.3 Safety Representatives	13
2.2.4 External Specialist Support in Health and Safety	13
2.2.5 First Aid	13
2.2.6 Arrangements	14-16

#### 2.3 Statement & Arrangements for Management of H&S in Shopping Centres

	<b>Page</b>
2.3.1 Policy Statement	18
2.3.2 Review of the Policy Statement	19
2.3.3 Publicity of the Policy Statement	20
2.3.4 Where to go for H&S advice	20
2.3.5 Communication	20
2.3.6 Regional H,S&W Committee	20
2.3.7 Shopping Centre H,S&W Committee and Objectives	21
2.3.8 Chief Executive C&R - Shopping Centres	22
2.3.9 Director of Guest and Customer Experience	22
2.3.10 Guest and Customer Experience Team – Operations	23
2.3.11 General Manager	24
2.3.12 Operations Manager	25
2.3.13 Marketing Manager	26
2.3.14 All supervisory Staff	27
Including, maintenance, security and cleaning teams	
2.3.15 All Employees	28

2.3.16	Inspections by Local Authorities	29
2.3.17	Company inspections/visits	29
2.3.18	Arrangements	30-33

<b>2020 Appendix :- COVID Policies and Procedures</b>	<b>33-43</b>
<b>COVID -19 Lockdown and reopening strategy</b>	<b>33</b>
<b>COVID-19 Capacity Management</b>	<b>38</b>
<b>COVID-19 Secure Risk Assessments</b>	<b>40</b>
<b>COVID-19 COSHH statement</b>	<b>41</b>

**Part 3:**  
**Wholly Owned operating business – SnoZone**  
**Policy available on request.**

## **PART 1**

### **1.1 Capital & Regional plc - Policy Statement**

Capital & Regional plc recognises, and fully accepts, its statutory and moral responsibilities to provide the highest standard of health and safety protection for its staff and for other people on or about the premises or sites for which it has managerial responsibility. This policy relates to the Capital & Regional undertakings for which it has managerial responsibility, and for the wholly owned properties currently managed by third parties on our behalf.

Capital & Regional plc is dedicated to ensuring:

- the health, safety and welfare of all our staff and others who work under our control;
- the safety of the general public who use or have access to premises or sites under our control;

In order to meet these aims we shall:

- keep up to date with best practice in relation to health and safety and comply with all relevant legislation and associated guidance;
- ensure, so far as is reasonably practicable, those who undertake work on our behalf apply the highest standards of health and safety for their employees and the community in general;
- co-operate actively with local authorities, statutory bodies and public services in the interests of public safety and the safeguarding of the environment;
- maintain to a high standard the working practices in respect of all the premises and sites over which we have responsibility;
- give a high priority to health and safety in all our operations and actively promote a positive health and safety culture;

- ensure that sufficient resources are available for health and safety in terms of finance, human resource and time;
- consult with, and involve, our staff in matters affecting their health and safety;
- provide the necessary equipment and training for the tasks to be performed;
- recognise our Directors and Managers who, according to their seniority, also have fundamental responsibilities to see that the Company Policy is effectively carried out; and
- monitor health and safety of all our divisions through regular meetings between the Capital & Regional plc Board and the various management Executives.

We require the full and active participation of all our employees in order that the principles outlined in this policy statement may be achieved. We aim to achieve best practice in terms of health and safety in all that we do.

**The Board of Directors of Capital & Regional plc fully support this Policy and a serious view will be taken to breaches of its content.**

**Signed**

**Date 01/10/21**

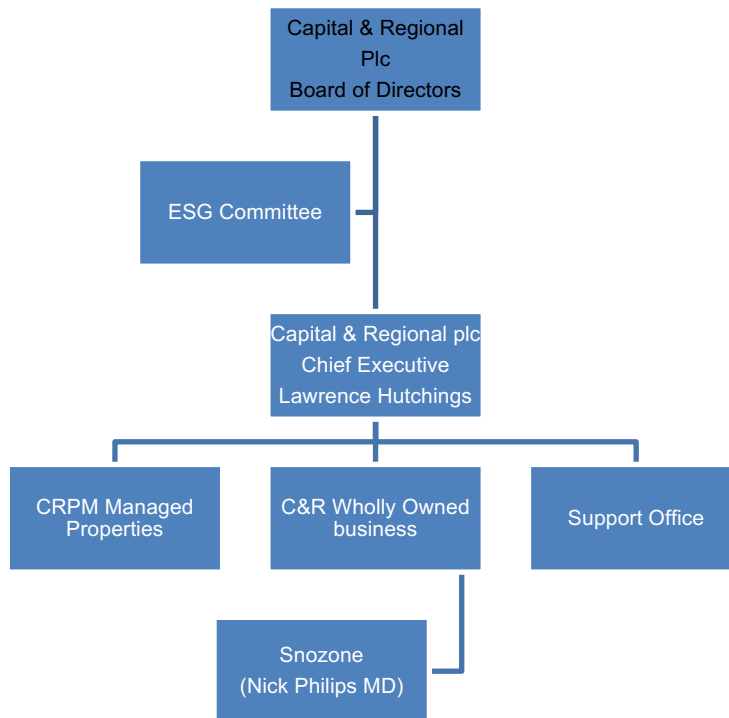
Lawrence Hutchings, Chief Executive, Capital & Regional PLC

## 1.2 INTRODUCTION TO CAPITAL AND REGIONAL PLC

In accordance with its duty under section 2 (3) of the Health and Safety at Work etc act 1974 and in fulfilling its obligations to both employees and the public who may be affected by its activities, the Board of Directors of Capital & Regional plc has produced the following statement of policy in respect of health and safety. This policy document and related systems relate to Capital & Regional plc, Capital & Regional Property Management and its operating client businesses.

Capital & Regional plc recognises, and fully accepts, its statutory and moral responsibilities to provide the highest standard of health and safety protection for its staff and for other people on or about the premises or sites for which it has managerial responsibility. It also regards health and safety as an integral part of the proper management of all the undertakings over which it has control.

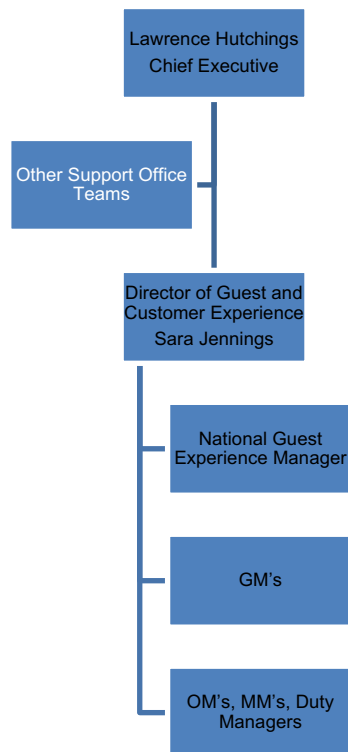
### C&R PLC H&S STRUCTURE CHARTS



### ESG COMMITTEE

This Committee meets on a quarterly basis and is chaired by a non executive Director. It provides the forum for reporting on activities in areas of health and safety and fire safety as well as other key areas of the businesses for which it has managerial responsibility. It also includes a review of key activities pertinent to those businesses in which it has a commercial interest/association, in order to add social, governance and environmental value to produce a positive sustainable impact for both society and the business itself. All areas of the business are represented on this committee, including the Chief Executive, and it provides the conduit on reporting of safety issues through to the Board.

## CAPITAL & REGIONAL PROPERTY MANAGEMENT – SHOPPING CENTRES



## ORGANISATIONAL STRUCTURE & MANAGEMENT RESPONSIBILITIES – CARRYING OUT THE POLICY

This section outlines the organisational structure that Capital & Regional plc and its subsidiary companies have in place to achieve the Statement in Part 1 of this Policy

### MANAGEMENT RESPONSIBILITIES

#### 1.3 THE CHIEF EXECUTIVE (LAWRENCE HUTCHINGS)

The Chief Executive of Capital & Regional plc has overall responsibility for Health and Safety within the organisation. The Chief Executive is responsible for ensuring that the Health and Safety Policy is applied throughout the organisation and for ensuring that all relevant matters brought to his attention are considered with appropriate action taken. In fulfilling this role, the Chief Executive will be advised and supported by the Board Directors.

#### 1.4 GENERAL RESPONSIBILITIES OF ALL BOARD DIRECTORS

All Board Directors are expected to actively support the Chief Executive in the development and proper implementation of Capital & Regional plc Policies. All Board Directors are expected to demonstrate their commitment to health and safety by setting a good example themselves and by ensuring that health and safety ranks equal with other aspects of management activities within their own sphere of control.

The Group Finance Director, will also have direct line management responsibilities for staff and working practices at the Support Office.

## **1.5 RESPONSIBILITIES OF COMPANY SECRETARY OR NOMINATED INDIVIDUAL**

- a) To ensure that legal and administrative communications relating to the Policy Statement and the Health and Safety At Work Etc Act 1974, are dealt with in both a proper and effective manner.
- b) To effectively communicate any legal issues pending or ongoing which may affect the operation of the, Capital & Regional plc, Capital & Regional Property Management sites and head office.
- c) To advise on any relevant legal issues.
- d) To ensure Directors of the business are aware of their legal and moral obligations in relation to Health and Safety within the operating businesses.

## **1.6 ALL EMPLOYEES**

All employees carry a legal obligation to take reasonable care for their own health and safety and for that of others who may be affected by their acts or omissions. This duty of care extends to everyone who could be at risk from his or her actions.

For further details of roles and responsibilities of Capital and Regional plc please refer to the following sections

## **1.7 REVIEW & PUBLICITY OF THE POLICY**

This policy will be reviewed and re-issued as required. Specialist Health and Safety advice is available from the National Guest Experience Manager, who may be contacted on 0207-932-8079.

A copy of the Policy Statement is issued to all Sites, and displayed where appropriate. It may be revised at any time in the future, any amendment being brought to the attention of site teams. Health and Safety information is also contained on the C&R Safe website, [www.capreg.com/safe](http://www.capreg.com/safe).

Individual responsibilities may also be included in job descriptions or contracts of employment with new information on health, safety or welfare being relayed to staff and contractors via the most appropriate means.

# **PART 2**

## **2.1 CAPITAL & REGIONAL PROPERTY MANAGEMENT LTD**

# **INTRODUCTION**

The Capital & Regional Property Management (CRPM) team provide the operational support to the operating businesses and ensure that health and safety is delivered at all sites within the direct managerial control of Capital & Regional plc. The following pages of this policy explain the current roles and responsibilities of the support functions.

### **2.1.1 CAPITAL & REGIONAL – CHIEF EXECUTIVE**

The Chief Executive is appointed to oversee the proper management of Capital & Regional Property Management (CRPM) functions and divisions. They are the person who is initially and ultimately responsible for the effective management of Health and Safety, and the implementation of effective Health and Safety Policy within Capital & Regional and the operating businesses. They must:

- a) By leadership and personal example, foster positive attitudes towards health and safety throughout their operating businesses, and ensure that health and safety is given the same priority and importance as any other corporate or business line objectives.

- b) Consider the health and safety implications to employees and non-employees of decisions made at either a strategic or operational level and act accordingly.
- c) Ensure that their management team know, understand and are held accountable for their individual responsibilities under the Capital & Regional plc Health and Safety Policy, through performance management processes.
- d) Ensure that their management team are provided with the appropriate resources in order to fulfil their health and safety responsibilities including the provision of information, instruction and training.
- e) Advise the relevant committee or sub committee responsible for resources, of any action required in order to comply with statutory requirements or any other difficulties that may arise.
- f) Establish appropriate mechanisms to allow the dissemination of information, and the communication and consultation on matters which affect the health and safety of employees (e.g. findings of risk assessments) within their operating businesses.
- g) Make the necessary arrangements to ensure that health and safety risk assessments are carried out for all work activities and processes within their operating businesses, and ensure that measures identified are implemented, their effectiveness monitored and reviewed at a timely interval.
- h) Make the necessary arrangements to ensure that Staff Safety Representatives appointed can effectively carry out their duties.
- i) To ensure H&S issues are discussed at the Responsible Business Meeting on a quarterly basis with an appropriate annual review for Board information.

### **2.1.2 HUMAN RESOURCES SUPPORT**

- a) To make provisions for suitable and sufficient training systems, to cater for new and existing staff members, covering basic introduction to health and safety through to specific qualifications or refresher courses for all levels of staff, as considered necessary.
- b) To liaise with other Directors, The Property Managers, and others in order that all forms of safety training operating within the Company are centrally recorded.
- c) To set performance standards specific to each job role, which should be reflected in the performance appraisal system.
- d) To be responsible for the implementation of policies within the company in relation to well being and healthy lifestyles e.g. stress, drugs and alcohol policy, sickness absence etc.

### **2.1.3 DIRECTOR OF GUEST AND CUSTOMER EXPERIENCE (GCE)**

The GCE Director, has responsibilities for co-ordination and delivery of excellent Health and Safety standards throughout the operating businesses through the direct line management of the GCE Operations team. (The role also requires more specific duties relating to Shopping Centres which are detailed within the shopping centres section of this policy). Duties here are listed below:

- To ensure that the Health and Safety policy and associated procedures are communicated within operating businesses and that they are actioned as appropriate.
- To ensure that any health and safety issue raised by the operating businesses are effectively communicated to the appropriate team member and others as appropriate.
- To ensure that Health and Safety ranks equal with other business priorities and forms part of the performance appraisal system for the operating businesses.
- To ensure that on site teams receive and act upon any new legislation with the assistance of the National Guest Experience Manager and the National Technical Facilities Manager
- To assist the NGEM and the NTFM in ensuring that the company and operating businesses meet their legal responsibilities in terms of compliance
- To encourage all operating business Managers to actively promote a positive health and safety culture throughout all their sites.
- To monitor all Health and Safety audit results to ensure action is taken where necessary.
- To support the H&S business updates through the Responsible Business Meeting and any other operating business safety forums where appropriate.



#### **2.1.4 NATIONAL GUEST EXPERIENCE MANAGER**

- To review and update the Health and Safety Policy when necessary, and advise the Director responsible for health and safety of change.
- Investigate and report upon all major incidents/accidents.
- Ensure improvements notices or letters from Enforcement Officers and reports are actioned.
- Monitor Health and Safety Risk Assessments, audits or reports and Health, Safety & Wellbeing Committee Minutes.
- Assist Managers/Supervisors in formulating safe systems of work as may be dictated by local circumstances.
- Monitor accident statistics and highlight areas of concern, including RIDDOR incidents.
- Update Managers on Health and Safety Legislation, Codes of Practice etc, by way of Guidance Notes and training sessions.
- Ensure an appropriate file of information connected with all matters pertaining to health and safety is maintained for each site.
- Advise of safety measures in relation to new works/modifications where appropriate.
- Liaise with others to organise suitable safety/training education programmes to stimulate safety consciousness at all levels, specifically in relation to Management/Supervisors who will implement the updating of new practices and procedures.
- To advise the Directors responsible for Health & Safety in writing of recommendations which are not being immediately actioned or which will need approval with regard to expenses.
- To liaise with contractors and other service providers to ensure the highest possible standards of health and safety across all sites for which Capital & Regional plc have an interest.
- Ensure that external contractors/suppliers with whom they have involvement, comply with the Capital & Regional Health and Safety Policy including permit to work requirements.
- Ensure that these contractors/suppliers have appropriate Risk Assessments and approved method statements available, together with sufficient insurance cover as agreed by the Company Insurers.
- Ensure that providers of services meet their legal obligations in terms of training and safe working practises.
- To ensure that contractors/suppliers have systems in place which confirms that any equipment on site or brought onto site for use by them complies with the relevant statutory requirements.
- To ensure that Health and Safety is prominently featured in any performance management system, and that appropriate action is taken where standards fall below expectations.
  
- Ensure that contractors employed by them, comply with the terms of the Health and Safety Policy, have the relevant Risk Assessment and approved method statements available, and have sufficient insurance cover as agreed by the Company Insurers.

#### **2.1.5 RESPONSIBILITIES OF COMMERCIAL TEAM**

- To implement and comply with all company health and safety policy and procedures.
- To ensure that this policy and health and safety in general is considered in the course of all decisions and is implemented in all actions so as not to put any employee, member of the public or visitor at risk.
- To liaise with the NGEM in projects which impact on these areas of the business.
- To ensure that organisations, other third party companies and contractors that they employ or secure deals with comply with their statutory obligations (including risk assessments), and have adequate insurance cover as may be dictated by the company's insurers.

#### **2.1.6 RESPONSIBILITIES OF THE PROJECT TEAM**

- Liaise with the other relevant teams within Capital & Regional, particularly the NGEM so as to consider health and safety implications of new projects in the centres or modifications to buildings or plant.
- Include in specifications, safety standards appropriate to design, construction, operation and maintenance of plant, equipment, structure and service, if not already covered by details shown or indicated on manufacturers, suppliers or contractors conditions of purchase or supplying services.

- Arrange where practicable, tests and examinations before items are brought into use, and periodically during use as dictated by the relevant legislation.
- Work closely with the NGEM on any asbestos issues which may arise, and to notify them of any asbestos removed from premises.
- Define safety controls for site work where necessary on the basis of Company Safety Rules.
- Where work is initiated by them to ensure the Contractors permit to work system is instigated and where necessary CDM Regulations are adhered to.
- Ensure that outside contractors employed by them, comply with the Capital & Regional Health and Safety Policy whenever necessary, have the relevant Risk Assessments and approved method statements available, and have sufficient insurance cover as agreed by the Company Insurers.

### **2.1.7 RESPONSIBILITIES OF ALL SUPPORT OFFICE TEAMS**

In addition to the responsibilities of ALL employees outlined in Part 2 of this policy, all Support Office teams will assist as necessary the business operations as required, taking into account all relevant legislation, with the support and guidance of the NGEM as necessary.

### **2.1.8 CAPITAL & REGIONAL PROPERTY MANAGEMENT – COMPANY COMMUNICATION**

Capital & Regional is committed to ensuring the highest standards of Health & Safety across all of its operations. As such, it is dedicated to ensuring that relevant issues are raised and discussed at the highest level so that the Board of Directors of Capital & Regional plc can be advised accordingly, and appropriate decisions made.

Therefore, the NGEM is responsible for preparing and presenting a Compliance Update at each ESG Meeting which is held on a quarterly basis. This is chaired by a Board Member and Non Executive Director and attended by the Chief Executive and the Director of Guest and Customer Experience.

A copy of the minutes from this meeting are circulated as appropriate.  
The quarterly compliance update includes the following:

- To report on safety and risk management, including audit results across the C&R businesses.
- Review activities of the various site Health, Safety & Wellbeing Committees and report anything of national significance.
- Review Legislation changes, and discuss methods of implementation.
- Report on accidents and trends, including near misses and work related ill health to ensure that company objectives are being met.
- To review risk and fire insurance surveys.
- To review and discuss enforcement activity and relevant case law.
- To review the training arrangements for health and safety.
- To annually review the aims and objectives of the Company Policy to ensure they have been met.
- To set yearly aims and objectives.

## **PART 2.2 CAPITAL & REGIONAL – HEALTH AND SAFETY ARRANGEMENTS IN SUPPORT OFFICE**

Please also refer to the Capital & Regional plc policy statement in Part 1 of this document.  
This policy will be reviewed annually and re-issued as required. Specialist Health and Safety advice is available from the NGEM who may be contacted on 0207 932 8079.

### **2.2.1 SUPPORT OFFICE SAFETY**

The Chief Executive Officer is ultimately concerned with policies and procedures for health and safety at work within the Capital and Regional Head Office. He is supported by the GCE team who are responsible for co-ordinating health and safety arrangements in respect of the Support Office. The team shall

- Ensure that the office facilities are equipped and laid out in a manner that provides for the safety of staff and other users.
- Co-ordinate fire and other emergency procedures for the offices.
- Keep fire risk assessments under review to ensure that they are kept up to date.
- Ensure that trained Fire Marshals are appointed as necessary.
- Ensure that trained first aiders and other first aid requirements are provided.
- Ensure that any statutory inspections of plant and equipment as required by health and safety law is carried out at the correct frequencies e.g. fire alarm systems, air condition units
- Arrange for defects or complaints in relation to health and safety within the office to be dealt with promptly.
- Arrange for periodic checks, inspections or audits of health and safety of the premises for which they have responsibility.
- Report to the appropriate Directors any issues that are considered to need an update of existing policies or to be dealt with through existing arrangements for formal consultation with staff.
- Periodically check conditions in the offices to identify health and safety defects and arrange for such defects to be remedied.
- Report accidents as necessary under the RIDDOR Regulations and investigate accidents and incidents where the cause is building related.
- Ensure that local health and safety arrangements for disabled employees or visitors address any special needs.
- Ensure that Health and Safety information notices are kept up to date and are displayed in the appropriate manner.
- Ensure any health and safety issues from the office are discussed with NGEM if necessary.
- To provide support and advice to management and employees on health and safety, in particular assisting managers in their duties to carry out risk assessments and manage health and safety within their area of responsibility.

### **2.2.2 ALL EMPLOYEES**

All employees carry a legal obligation to take reasonable care for their own health and safety and for that of others who may be affected by their acts or omissions. This duty of care extends to everyone who could be at risk from his or her actions. Specific responsibilities include:

- Complying with safe working methods, instructions and training given.
- Reporting any hazards found in the building to the Office Manager or Guest and Customer Experience Team.
- Reporting any accidents or other potentially serious incidents in which they are involved or that they become aware of.
- Complying with guidelines on the proper use of equipment and personal protective equipment.
- Complying with local health and safety procedures while on premises or sites under the control of someone else.
- Remaining alert to health, safety and security risks while at work and acting accordingly.
- Drawing attention to the need for additional health and safety procedures (or for the improvement of existing ones.)
- Not interfere with or misuse any article provided in the interest of health and safety.

### **2.2.3 SAFETY REPRESENTATIVES**

Safety representatives may be appointed by members of staff to represent them in discussions with the Board on matters concerned with health and safety. They have a valuable contribution to make to on-going improvements in health and safety and their active participation will be encouraged. However, they act as representatives of the staff and do not have executive responsibilities.

### **2.2.4 EXTERNAL SPECIALIST SUPPORT IN HEALTH AND SAFETY**

Capital & Regional plc may, from time to time, appoint competent external specialist support to assist with the adequate discharge of its responsibilities for health and safety.

### **2.2.5 RESPONSIBILITIES OF FIRST AIDERS**

Sufficient First Aiders/Appointed Persons are on duty at all times, and will report all accidents. First aid is the first assistance or treatment given to a casualty, for any injury or sudden illness. A First Aider is a person who has been fully trained and holds a current First Aid Certificate. If sudden or acute illness or serious accidents occur, Reception should be contacted in the first instance. Every accident no matter how minor must be recorded in the accident book which is kept at reception.

- a) First Aiders shall be expected to assess if illness or injury requires treatment and/or additional help e.g. ambulance.
- b) Ensure in all cases of first aid being given by the designated First Aider, a report is completed whether the incident is illness or injury, and that the incident is investigated, and the necessary action taken to prevent a recurrence.
- c) Hold responsibility for first aid boxes and ensure that supplies are well stocked and boxes are kept clean.
- d) Ensure that line managers are informed of any major incidents, so that appropriate action may be taken.
- e) Ensure that the company guidance on accidents and reporting and investigation is adhered to at all times.

### **2.2.6 ARRANGEMENTS FOR CARRYING OUT THE POLICY – SUPPORT OFFICE**

#### **INTRODUCTION**

This part of the Safety Policy is included to highlight the main arrangements made by Capital & Regional for Health and Safety within the Support Office.

#### **IF YOU DISCOVER A FIRE...**

If you discover a fire OPERATE THE NEAREST BREAK GLASS ALARM IMMEDIATELY. It is possible to do so WITHOUT PUTTING YOURSELF AT RISK, and only if trained to do so, tackle the fire with the fire extinguishers provided. Leave immediately via the nearest fire exit, and assist in evacuation of others if required to do so.

## **ON HEARING THE ALARM**

### **DO**

- take the nearest staircase and
- leave the building via the fire exit or main entrance;
- ensure that your visitors are leaving the building with you;
- go straight to the assembly point
- assemble with other staff from your floor;
- report to your fire marshal and;
- wait for further instructions.

### **DON'T**

- Panic!
- use the lift;
- be a hero by using the fire extinguisher you just noticed and don't know how to use ..... yet;
- stop to collect personal belongings;
- leave your visitors alone;
- quickly use the toilet;
- assemble with colleagues for a quick chat
- wander off to run some errands;
- have lunch in a café nearby;
- tell someone to tell the fire marshal that you won't be there
- return to the office before your fire marshal has given the all clear;

### **And do remember**

- Vulnerable people next to you may need extra help (e.g. anyone using crutches, wheelchair users, partially sighted or deaf people, pregnant women)
- If you have a meeting that is attended by a wheelchair user, they must be accompanied to the designated safe area of the evacuation landing and the fire brigade informed immediately.
- Never ever put your life at risk!

### **Fire Marshalls**

There are trained fire marshals in the building whose job it is to “sweep” the floor to ensure that no one is left behind (or hiding). If you have any questions at all please speak to your fire marshal – please see reception for the up to date list of fire wardens.

In the rare event of no fire marshal being present on your floor the fire brigade will be informed of the floor that has not been swept and will act accordingly. The absence of a fire marshal should have no bearing on your behaviour – i.e. to leave the building immediately and proceed to the assembly point.

## **SMOKING**

In the interest of Health and Safety, the building is a no smoking premises, and smoking is therefore not permitted anywhere within the building. Those who permit smoking in any area will be regarded as having condoned the offence.

## **WELFARE OF EMPLOYEES**

The Directors and Management of Capital & Regional are concerned for the welfare of the employees and a periodic review of arrangements will take place. This is carried out in conjunction with the HR team.

## **INSPECTIONS**

Inspections of the building and office areas are made by those with responsibility for Health, Safety and Welfare. Report findings and conclusions are carefully monitored to ensure compliance with relevant legal provisions and the company safety policy.

## **MONITORING**

Monitoring of systems and areas of concern enable Capital & Regional to review its Policy, thereby ensuring that changes in staff, location, materials or equipment do not introduce unforeseen hazards, also enabling performance to be measured for particular areas of control. More detailed monitoring and auditing systems are currently being developed.

## **SAFETY SUGGESTIONS**

The company welcomes constructive safety suggestions which seek to improve Health, Safety and Welfare matters and will have regard to any suggestions received. Suggestions may be made through the HR manager and or safety representatives. In addition, employees should be encouraged to report maintenance/H&S issues requiring attention to the Office Manager or the NGEM having first informed their immediate supervisor.

## **CHEMICALS & SUBSTANCES**

The Company carries out assessments of substances used in accordance with the Control of Substances Hazardous to Health Regulations 2002. Therefore no member of staff must bring in to work any chemicals subject to these regulations.

## **MAINTENANCE**

Advice on maintenance or repair/replacement of equipment supplied at work is available from the NGEM or HR manager.

Any item which is defective should not be used and should be notified to the HR Manager in the first instance. Any equipment causing injury should be examined by a competent person following any accident and a report written on its condition.

## **HEALTH & SAFETY LEGISLATION**

The Health and Safety at Work Etc. Act 1974, is the main piece of legislation, and applies to all work places, whatever their size or business and to everyone at work. The act requires employers, to ensure so far as is "reasonably practicable" the health, safety and welfare of their employees and anyone else who may be affected by their work (e.g. contractors and public). Many regulations governing general safety, equipment etc are made under this Act, and guidance on specific issues can be obtained from the H&S representatives.

## **RISK ASSESSMENTS AND VDU'S**

Risk Assessments are a vital part of Health and Safety Systems. Capital & Regional assesses risks to the health and safety of its employees, visitors, customers and contactors - this means thinking systematically about all areas of the business and our activities, who might be harmed and what can be done to eliminate or reduce risk. Details of risk assessments are available on the C&R Safe website. All employees are encouraged to discuss risk and control methods with their Line Manager and the HR Manager as appropriate.

VDU assessments will be periodically carried out, however if any member of staff is experiencing any problems related to VDU use, they should contact the NGEM in the first instance.

## **PART 2.3**

# **CAPITAL & REGIONAL HEALTH AND SAFETY ARRANGEMENTS FOR OPERATING BUSINESSES**

## **SHOPPING CENTRES 2020**



## CRPM LTD

### 2.3.1 STATEMENT OF COMPANY HEALTH & SAFETY POLICY – SHOPPING CENTRES

This policy statement and related systems relates to the operation of Shopping Centres, managed or owned, either wholly or partly by Capital & Regional Property Management, and includes the Mall Portfolio, Marlowes Centre Hemel Hempstead, Exchange Ilford, and Kingfisher Centre Redditch.

#### **Aims**

It is the aim of Capital & Regional to seek and provide as far as is reasonably practicable, a safe and healthy working environment for all persons either working in or visiting the shopping centres, and to enlist the support of employees and our service partners at all levels, in creating an awareness of adequate Health and Safety Standards.

In doing so, Capital & Regional will have regard to the relevant Statutory Provisions of the Health and Safety at Work Etc. Act 1974, and will pay particular attention to the provision and maintenance of:

- i) Plant, equipment and systems of work that are safe.
- ii) Safety arrangements for the use, handling, storage and transport of articles and substances.
- iii) Sufficient information, training, instruction and supervision to enable all employees and others upon company premises to avoid hazards and contribute positively to their own health and safety.
- iv) A safe place of work and safe access and egress resorting thereto.
- v) A healthy working environment.
- vi) Adequate welfare facilities.

The Company aims to provide a positive Health and Safety culture, which is actively supported by Senior Management.

#### **Objectives**

1. To ensure that adequate arrangements are in place for the effective development and review of CRPM Health and Safety Policy within the shopping centre premises.
2. To ensure effective and adequate planning takes place to address health and safety issues within the businesses.
3. To ensure that sufficient resources are available for health and safety in terms of finance, human resource and time.
4. To ensure that management regards Health and Safety highly amongst business functions.
5. To ensure that appropriate systems are developed and maintained for the effective communication of health and safety issues right throughout the Business.
6. To provide the necessary information, instruction and training to employees and others to ensure their competence with regards to health and safety.
7. To recognise its Directors and Managers according to their seniority also have fundamental responsibilities to see that the Company Policy is effectively carried out.
8. To take every reasonable precaution to prevent accidents, near misses and work related ill health anywhere within the organisation, investigating as necessary and acting upon the information gained in order to prevent the risk of re-occurrence.
9. To take all such steps as it deems necessary to provide competent technical advice on health and safety matters, where this is necessary to assist management in performing its operations in accordance with the relevant statutory provisions of the Health and Safety at Work Etc. Act 1974.

**The Directors of Capital & Regional plc and Capital & Regional Property Management Ltd fully support this policy and a serious view will be taken to breaches of its content**

**Lawrence Hutchings – Chief Executive**

**Date: 01/10/2021**



### **2.3.2 REVIEW OF THE POLICY STATEMENT**

The approach to achieving high standards of health and safety within Capital & Regional needs to be systematic and thorough. The company will therefore review the effectiveness of this policy and associated procedures annually. The review will look at in particular whether:

- a) The Policy Statement is achieving desired results
- b) Specific responsibilities assigned to individuals are being completed
- c) Consultative arrangements within the Company are effective
- d) Policy Guidance in support of the Policy are being implemented
- e) Accident and hazard reporting procedures are effective
- f) General fire and emergency arrangements are effective
- g) Health and Safety training arrangements are effective

### **2.3.3 PUBLICITY OF THE POLICY STATEMENT**

A copy of the Policy Statement is issued to all Centres, and displayed where appropriate. It may be revised at any time in the future, any amendment being brought to the attention of centre teams. Health and Safety information is also contained on the C&R Safe website.

Individual responsibilities may also be included in job descriptions or contracts of employment with new information on health, safety or welfare being relayed to staff and contractors via the most appropriate means.

### **2.3.4 WHERE TO GO FOR HEALTH AND SAFETY ADVICE**

Should there be a query relating to health and safety you should firstly approach your supervisor/manager, or a member of the site Health, Safety & Wellbeing Committee - if you are still not able to resolve the issue, remember that the National Guest Experience Manager (NGEM) can advise on Health and Safety matters. Advice is available to management, trade union representatives and employees. The NGEM may also undertake inspections of the centres, assist with health and safety training and monitor and review the safety policy. The National Compliance Manager may be contacted on 0207-932-8079.

These duties do not detract from the prime responsibility of managers and supervisors for ensuring safe working conditions, and employees' responsibility to co-operate in ensuring that these safe working conditions are maintained.

### **2.3.5 CAPITAL & REGIONAL ESG COMMITTEE**

This committee meets quarterly and is attended by the Chief Executive and other Senior directors and managers to discuss issues of national significance across the business. The NGEM and also report on relevant issues across the businesses. Other members of the support office teams are invited to attend as appropriate.

Please refer to Section 2.1.9 for further information.

### **2.3.6 REGIONAL HEALTH, SAFETY & WELLBEING COMMITTEE (SHOPPING CENTRES)**

Due to the current limited number of centres, this committee is not necessary due to Issues being identified and addressed by the NGEM, and GCE team on their visits and fed back to the ESG Meeting as appropriate. This will be reviewed every 6 months. Reviewed October 2021.

- *To communicate risk levels at the Shopping Centres and discuss/set objectives for those deemed not to be achieving required standards.*
- *To review Health, Safety & Wellbeing Committee issues which have a national implication, and incorporate their comments into policy decision making.*
- *To review accident trends and suggest improvements.*
- *To review the impact of any new legislation.*
- *Formulate and promote good practices.*
- *To organise the Health and Safety Week and promotional campaigns.*
- *To assist the Company in achieving its aims and objectives.*
- *To communicate minutes of the meeting and other relevant issues to all the shopping centres.*
- *To review the results of the annual audits and associated action plans*

### **2.3.7 SHOPPING CENTRE HEALTH, SAFETY & WELLBEING COMMITTEE**

Each centre has an operational Health, Safety & Wellbeing Committee comprising of representatives from all areas of the Centre, and is chaired by the General Manager.

The committee's functions may be summarised as follows:

- To discuss any health and safety issues.
- To ensure that Health and Safety Policy and Procedures are being adhered to in regards to the various day to day operations.
- To provide guidance on specific Health and Safety matters when necessary.
- To carry out or recommend investigation or assessment to work systems when necessary.
- To consider enquiries and suggestions in relation to health and safety, and forward these to the NGEM to assist in Policy decision making.
- Review accidents/other reports in respect of general Health, Safety and Welfare matters.
- To keep minutes of meetings, circulating them to Committee members and others as requested, including the Facilities Management team.
- To report matters of National significance to the NGEM.
- To review risk assessments and to ensure they are being actioned.
- To keep updated on new legislation via the information sent out from the NGEM
- To review and ensure action has been taken on the Joint Unit Inspections.

To ensure communication of the policy to all the Shopping Centre teams

### **OBJECTIVES OF EACH SHOPPING CENTRE HEALTH, SAFETY & WELLBEING COMMITTEE**

A major objective of the Committee is to provide an effective forum to discuss all matters relating to Health, Safety and Welfare. Also to suggest actions to resolve issues identified, whilst working to improve Health, Safety and Welfare performance.

The Committees must meet at bi-monthly intervals, the agenda including the presentation and discussion of accident reports and the announcement of new legislation, information on health and safety, and matters of general interest, and adequate provision for the discussion of members' points.

Minutes of the meeting are distributed as appropriate and must be displayed on staff notice boards.

Staff should also be encouraged to suggest improvements for health and safety on local and national issues.

## COMPOSITION OF THE HEALTH, SAFETY & WELLBEING COMMITTEE

The Shopping Centre Health, Safety & Wellbeing Committee should be composed of the following personnel or their representatives (as shown below).

General Manager (Chair)  
Operations Manager  
Member of staff from: Cleaning  
Security  
Maintenance (where appropriate)  
First Aider  
Service road area (where appropriate)  
Marketing  
AMP

Where possible a deputy should be appointed for each of the above to ensure the full membership at each meeting, and retailers should also be invited to attend.

## SPECIFIC HEALTH AND SAFETY RESPONSIBILITIES AT DIRECTOR LEVEL

Health and Safety control often suffers from a lack of definition; it is the intention of the following paragraphs to assist in identifying key individuals within the company who have specific roles to play.

The following organisational details have been drawn up and agreed by the Board of Directors, and all staff should make themselves aware of their responsibilities along with the responsibility of others, **EVERYONE** has responsibilities contained in the following paragraphs.

Safety responsibilities must be taken seriously; the Board will support all staff members who have specific roles to play, and disciplinary action will be taken against any member of staff who deliberately neglects their responsibilities.

### 2.3.8 CHIEF EXECUTIVE C&R

As described previously, the Chief Executive has overall responsibility for the Health, Safety and Welfare of staff, members of the public, and those legally on company premises to ensure compliance with the Company Health and Safety Policy, and the relevant statutory provisions of the Health & Safety at Work Etc. Act 1974. In addition the Chief Executive also has responsibility for the following:-

- By leadership and personal example, foster positive attitudes towards health and safety and demonstrate commitment not only in words but visible action within C&R and the operating sites.
- Act upon any matters which require a change in the corporate policies in relation to health and safety.
- To attend the C&R ESG committee
- Report on a regular basis on any aspects of health and safety performance that the Executive/Board Directors need to be informed of in their role as employer.
- Ensure that the necessary resources for health and safety within C&R shopping centres, are planned into forward budgetary programmes.
- Ensure an effective Health and Safety policy is developed, communicated and adhered to in the shopping centres.
- Consider the health and safety implications to employees and non-employees of decisions made at an operational level and act accordingly.
- Ensure that all personnel under their control, including temporary workers, contractors, agency workers and consultants know and understand their responsibilities under Capital and Regional's Health and Safety Policy.
-

## **RESPONSIBILITIES OF THE GCE TEAM**

### **2.3.9 DIRECTOR OF GUEST AND CUSTOMER EXPERIENCE**

- To assist the Chief Executive in ensuring that the Health and Safety policy and associated procedures are communicated to all the C&R shopping centres and that they are actioned as appropriate.
- Together with the NGEM ensure that any health and safety issue raised by shopping centres are effectively communicated to others as appropriate.
- To ensure that Health and Safety ranks equal with other business priorities and forms part of the performance appraisal system for General Managers and Operations Managers.
- To ensure that teams on site receive and act upon any new legislation with the assistance of the Guest and Customer Experience (GCE) Team.
- To support the GCE team in ensuring that the company meets its legal responsibilities in terms of compliance.
- To work closely with the GCE Team to actively promote a positive health and safety culture throughout all their centres during their visits.
- To monitor the C&R Safe audit results to ensure action is taken where necessary.
- Ensure that all personnel under their control, including temporary workers, contractors, agency workers and consultants know and understand their responsibilities under Capital and Regional's Health and Safety Policy.
- Ensure that all personnel under their control are adequately trained and competent to perform the task required and are made fully aware of all known hazards associated with their work.
- Ensure that new starters e.g. new employees, temporary workers, agency workers, and consultants are inducted for health and safety as soon as possible upon commencement of their employment.
- With the assistance of qualified Health and Safety professionals, complete risk assessments for all work activities and processes falling within their span of control which pose significant risks to employees and non-employees.
- Ensure that any safety measures introduced as a result of the risk assessments are monitored to ensure they are effective and that reviews are undertaken as and when necessary.
- Ensure that all accidents, incidents and near miss events falling within their area of responsibility are reported and appropriately investigated in accordance with the accident reporting procedures detailed in this policy.
- Where managers have responsibility for built estate, plant and equipment, ensure that all statutory regulations and codes of practice are adhered to and that such plant and equipment is effectively maintained to a safe standard, including statutory inspections where required (e.g. passenger lifts).
- Ensure that any health and safety matter brought to their attention by an employee, staff safety representative or other person, receives prompt and appropriate attention.
- Ensure that any health and safety matter which cannot effectively be resolved at a local level is discussed at the appropriate level
- To ensure that any health and safety issue raised by a site is effectively communicated to others as appropriate.
- To ensure that Health and Safety ranks equal with other business priorities and forms part of the performance appraisal system.
- To ensure that the Shopping Centres receive and act upon any new legislation with the assistance of the GCE team.
- To assist the GCE team in ensuring that the company meets its legal responsibilities in terms of compliance.
- To co-operate with others to ensure the appropriate resources are available to enable the Company to manage its health and safety performance.

### **2.3.10 GUEST AND CUSTOMER EXPERIENCE TEAM – OPERATIONAL ROLE**

- To ensure that the Health and Safety policy and associated procedures are being adhered to and implemented in their respective Centres.

- To report any serious health and safety breach or incident to the Director of Guest and Customer Experience and others as appropriate.
- Include Health and Safety compliance issues as part of the performance appraisal system of the centre management teams.
- To have due regard to the C&R Safe audit carried out at each Centre and direct the Centre accordingly.
- To promote a positive health and safety culture throughout their respective centres by taking an active interest in compliance issues, and ensuring the Shopping Centre Health and Safety Committee meets at appropriate intervals, with the minutes being circulated and acted upon as appropriate.
- To support the Directors in their role to ensure they are kept informed of health and safety issues and performance across the business.

### **2.3.11 RESPONSIBILITIES OF THE SHOPPING CENTRES GENERAL MANAGERS**

- To implement the Company Policy and Procedures including C&R Safe Guidance relating to their centre and to ensure all employees have been informed of and understand the organisation and arrangements for implementing this Policy.
- Ensure that this Policy is considered in the course of all decisions and implemented in all actions relating to the centre operations.
- Ensure that staff working on any potential hazardous tasks:
  - Are appropriately trained
  - Operate machinery/equipment which is properly maintained, in a safe environment and complies with the relevant statutory provisions of Health and Safety Etc. Act 1974.
  - Operate a safe system of work.
  - Are provided with protective clothing as necessary, and that it is properly used once supplied.
- Work closely with their teams, and report items of defective structure, fixtures, fittings etc, for repair or investigation to the NGEM.
- Investigate reports of unsatisfactory systems of work taking action as necessary.
- Visibly demonstrate interest and compliance with safety rules to staff, provide channels of communications, and where necessary consult with employees on all Health, Safety and Welfare matters.
- Ensure that established arrangements for training e.g. training needs assessments are maintained and regularly reviewed, advising HR and Director of Guest and Customer Experience of any specific training needs.
- Regularly review health and safety performance by checking Risk Assessments and ensure that agreed remedial measures are taken as required, and that staff are fully informed of the contents.
- Ensure via good communication and weekly meetings that you are kept aware of any relevant H&S issues within your centre.
- Forward copies of all letters/reports received from all Enforcement Authorities to the Company Secretary and NGEM
- Ensure the Health, Safety & Wellbeing Committee meets bi-monthly, by attending and chairing and ensuring the minutes are actioned and communicated to all staff.
- Be kept fully informed of any accidents on site, and investigate any major incidents.
- To ensure that Joint Unit Inspections are being carried out and that the FRA are being recorded on the C&R Safe/Pyramid system.
- To ensure that any action points identified in the C&R Safe Audit are completed as appropriate.

### **2.3.12 RESPONSIBILITIES OF THE SHOPPING CENTRE OPERATIONS MANAGER**

Each Centre has a designated Operations Manager with specific health and safety duties. Their responsibilities include:

- To regularly inspect the Centre to ensure legislation is being complied with, and report to the General Manager on all matters relating to health and safety. Defects must be recorded in the defects log and on the daily checklists.
- To carry out Joint Unit Inspections at every unit within their Centre and to follow through any items requiring attention by the most appropriate means and following the guidelines of our insurers. FRA information must also be recorded on Pyramid.
- To assist in formulating training needs assessments and subsequently training sessions and safe systems of work as may be dictated by local circumstances.
- To ensure there is a system of recording complaints of all defects concerning the building, its environment and contents, including fixtures, fittings and machinery and that these are actioned.
- To review accident reports and take action to prevent recurrence.
- To attend the scene of all major accidents, fires or dangerous occurrences and to ensure the correct action is taken in accordance with statutory regulations i.e. RIDDOR and Company Policy and to report such incidents to the NGEM.
- To immediately inform the NGEM whenever machinery is involved in accidents.
- To ensure that the Centre risk assessments are completed on C&R Safe database, and that site specific assessments are also undertaken and recorded.
- To attend training days where necessary, and action matters as directed by the NGEM in relation to safe systems.
- To attend the bi-monthly Health, Safety & Wellbeing Committee Meetings and to ensure that the minutes are actioned and communicated to all staff.
- To ensure that all health and safety files are kept organised and up to date, including Guidance Notes issued by the NGEM.
- To ensure that relevant legislation is complied with, including Risk Assessments.
- To ensure that all plant and equipment is regularly maintained in accordance with statutory requirements and insurance recommendations.
- To monitor the use of contractors and ensure that work permits are issued in accordance with the C&R Safe guidance.

To ensure that any action points identified in the C&R Safe Audit are completed as appropriate.

### **2.3.13 RESPONSIBILITIES OF MARKETING MANAGERS IN SHOPPING CENTRES**

- To assist in the implementation of, and compliance with, all company health and safety policy and procedures.
- To ensure that health and safety issues are considered and implemented in all local and shared activities at their Centre, so as not to put any employee, member of the public or visitor at risk.
- To communicate with, and to work closely with, the Centre Operations Manager to ensure that all H&S risks associated with marketing activities are considered and assessed to minimise risk.
- To attend and contribute to the bi-monthly Health, Safety & Wellbeing Committees.
- To attend H&S training days as appropriate.
- To ensure that organisations, other third party companies and contractors employed directly by the Centre comply with their statutory obligations (including risk assessments), and have adequate insurance cover as may be dictated by company insurers.
- To ensure, together with the Operations Manager that adequate arrangements are in place for the erection and dismantling of marketing promotions, so as not put themselves, the contractors or any members of the public at risk.

### **2.3.14 RESPONSIBILITIES OF ALL ON SITE SUPERVISORY STAFF INCLUDING SECURITY, MAINTENANCE AND CLEANING TEAMS**

- Implement the Company Policy & procedures relating to their area function & responsibility.
- Ensure that all for whom you are responsible are aware of Capital & Regionals Health and Safety Policy and their duties to health and safety and that they follow approved operating instructions where applicable. This must include details of the Risk Assessment and controls in their area(s).
- Ensure that full and proper training is given to new employees and others transferred to new jobs, and that they are properly supervised during this training.
- Assist in resolving any health and safety matter referred to them. Communicate problems for which a satisfactory solution cannot be achieved through the appropriate safety channels laid down.
- To ensure that Housekeeping standards are maintained, and that safety checks are carried in accordance with the Risk Assessment.
- Fire precautions and safety equipment - ensure safety requirements are met and in line with the Safety Policy, maintaining strict compliance with company work practices.
- Apply the company disciplinary procedure should any employee/contractor intentionally or wilfully disregard their statutory duty or Company Health and Safety Rules.
- Ensure that all accidents, dangerous occurrences, or health problems are reported to the relevant support team.
- To report all health and safety issues together with maintenance problems to the relevant support team.
- Continually review and update information and own knowledge concerning Health and Safety at Work by way of the Company Policy.
- Ensure that all staff in your supervision are informed of the hazards, risks and controls associated with their areas identified in the Risk Assessment, and receive formal health and safety training as per the Company training plan.

### **2.3.15 RESPONSIBILITY OF ALL EMPLOYEES**

All of us employed by Capital & Regional Property Management can help in protecting and improving the Health and Safety of ourselves, colleagues, customers and others on company premises. This is more than good sense, it is a **SPECIFIC LEGAL DUTY PLACED ON EMPLOYEES.**

#### **THE HEALTH AND SAFETY AT WORK ETC. ACT 1974**

##### **SECTION 7 – states;**

It shall be the duty of EVERY employee while at work:

- To take reasonable care for the health and safety of themselves and of other persons who may be affected by his acts or omission at work, and
- To co-operate with your employer over health and safety matters.

##### **SECTION 8 – states;**

No person shall intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare in pursuance of any of the relevant statutory provisions. Failure to observe the Law outlined above can result in both serious injury AND the risk of heavy fines or imprisonment, for the employee concerned.

In the interest of themselves and others, all members of staff are also required to observe safe working methods and safety regulations.

##### **In particular:**

- All people on site and in the Support Officer should be aware that consumption of alcohol, and use of illegal drugs making an employee unfit, or incapable of carrying out his/her duties will itself be the subject of disciplinary procedure.

- Should a member of the team be taking medicines prescribed or other off the shelf medication that may cause an adverse physical effect in the course of performance of their duties, then this shall be brought to the attention of the employee's immediate supervisor.
- Read and comply with the Company Safety Rules and Policy Requirements including the Risk Assessments for your area.
- If required by law, or when the company considers it necessary, wear or use whatever personal protective equipment is provided.
- Report to the supervisor and seek first aid from an appointed First Aider for any injuries however minor these may be.
- Regularly check, and report unsafe conditions, equipment, practices, potential hazards or dangerous occurrences to the immediate site supervisor.
- Follow only safe systems for carrying out tasks, if you are in any doubt ALWAYS ASK FIRST.

### **2.3.16 INSPECTION/VISITS BY LOCAL AUTHORITY INSPECTORS**

Environmental Health Officers from the Local Authorities covering Capital and Regional locations are charged with the enforcement of the Health and Safety at Work Etc. Act 1974. This means that at any time an appropriately authorised officer may upon production of his/her identity and authorisation, inspect any work area to establish whether legal requirements are being met.

Visits by Environmental Health Officers should be notified as soon as possible to the NGEM or the Support Office.

It is useful to understand the powers of Health and Safety Enforcement Officers when they visit. They have the right of entry at any reasonable time and may;

- carry out examinations, including taking measurements, photographs and samples
- take possession of an article and arrange for it to be dismantled and tested
- require you to answer questions and provide information
- inspect and copy documents
- talk to and interview employees if necessary in private
- may serve legal improvement or prohibition notices
- may prosecute the company or individuals for serious breaches

### **2.3.17 COMPANY INSPECTIONS/VISITS**

Inspections by the support teams may be carried out.

An Audit will also be carried out annually by an external consultant.

Follow up inspections may be carried out following the rectification of a hazard.



### **2.3.18 INTRODUCTION TO HEALTH AND SAFETY ARRANGEMENTS WITHIN THE SHOPPING CENTRES**

This is part of the Safety Policy is included to highlight the main arrangements made by the company for Health and Safety within the centres themselves.

#### **GENERAL ARRANGEMENTS**

##### **FIRE**

##### **IF YOU DISCOVER A FIRE**

If a fire is discovered THE ALARM SHOULD BE RAISED IMMEDIATELY. It is possible to do so WITHOUT PUTTING YOURSELF AT RISK, and only if trained to do so, tackle the fire with the fire extinguishers or fire hose reels provided throughout. Leave immediately via the nearest fire exit, and assist in evacuation of others if required to do so.

##### **ON HEARING THE ALARM AND/OR PUBLIC ADDRESS ANNOUNCEMENT**

- Leave the area immediately by the nearest available fire exit and report to your assembly area.
- The Fire Wardens will take charge of the evacuation and ensure that no one is left in the area.
  - USE THE NEAREST AVAILABLE FIRE EXIT
  - DO NOT USE LIFTS
  - DO NOT STOP TO COLLECT PERSONAL BELONGINGS
  - DO NOT ATTEMPT TO RE-ENTER BUILDINGS

##### **REMEMBER:**

- IF YOU DISCOVER A FIRE RAISE THE ALARM IMMEDIATELY
- IF YOU SMELL BURNING CONTACT SECURITY IMMEDIATELY
- KEEP FIRE POINTS AND EXITS CLEAR AT ALL TIMES
- KEEP FIRE DOORS CLOSED AT ALL TIMES
- KNOW THE LOCATION OF THE FIRE EXTINGUISHERS
- KNOW THE EXITS FROM YOUR PLACE OF WORK
- KEEP CALL POINTS CLEAR
- IF YOU OBSERVE SOMEONE MALICIOUSLY ACTIVATING A CALL POINT REPORT THE FACT TO SECURITY
- KNOW YPOUR EVACUATION PROCEDURE

#### **HEALTH, SAFETY & WELLBEING COMMITTEE – CENTRE LEVEL**

The established Centre Health, Safety & Wellbeing Committee meet on a bi-monthly basis with minutes of the full proceedings being circulated and available to be viewed by all staff on notice boards All staff must be aware of who the Committee members are, and can report any matters of concern, or any safety suggestions to their Committee member.

#### **TRAINING**

Staff joining the Company receive induction training which includes Health and Safety. Further safety training and advice is given via H&S toolkit 1 and 2, and on the e-learning portal on C&R Safe. Further training available can be discussed by contacting the NGEM.

All employees discuss their Training Needs at their annual appraisal, and are encouraged to discuss other training needs which may arise with their Manager.

Employees involved in supplying safety advice to others are provided with training commensurate to their needs and responsibilities whenever necessary.

## **ACCIDENTS**

All accidents however slight that occur to customers, employees or others during working hours must be reported immediately.

## **DANGEROUS OCCURRENCES**

A dangerous occurrence (as defined by the RIDDOR Regulations) whether or not resulting in injury must be reported without delay directly to the relevant support team member.

## **ACCIDENT ANALYSIS**

Accident statistics are discussed at Responsible Business Committee for consideration, any accident or dangerous occurrence notified to the Local Authority may also be advised at this forum. Details of the accident investigations are discussed, and any necessary follow up action must be taken.

## **SAFE SYSTEMS OF WORK**

The Company being aware that some work practices may hold the risk of personal injury, will prepare instructions to staff, train and otherwise manage systems of work which allow for special risks, in order that a safe system of work is achieved.

## **CONTRACTOR WORKS**

Where contractors are employed to carry out works they will be notified of their responsibilities, especially in respect of the Company Health and Safety Policy. New works will only commence once consideration has been given to health and safety. Contractors must not be allowed to work unless they have signed a Contractors Work Permit, and a safe method statement has been agreed. All contractors working on company property will need to first complete a prequalification's questionnaire and submit insurance documentation as well as H&S information.

## **PERSONAL PROTECTION**

The Company provides many forms of protective clothing of different types, sizes etc. Any protective clothing provided in order to comply with legislation (in particular the Personal Protective Equipment Regulations 1992) or otherwise is required to be worn by staff with Supervisors checking use, suitability and repair. Examples of Personal Protective equipment include gloves, goggles and boots.

## **FIRST AID**

Sufficient First Aiders are on duty at all times, and will report all accidents. First aid is the first assistance or treatment given to a casualty, for any injury or sudden illness. A First Aider is a person who has been fully trained and holds a current First Aid Certificate. If sudden or acute illness or serious accidents occur, Security should be contacted in the first instance

## **SICKNESS ABSENCE**

Employees must report to their manager sickness absence if they:

- a) have been off work for 3 days with a work related injury/sickness;
- b) are a Food Handler; or
- c) have been in hospital.

For headaches, colds, upset stomach and other minor ailments you should provide your own medication.

## **SMOKING**

In accordance with the law, and in the interest of Health and Safety, C&R premises are no smoking premises. Those who permit smoking in any area, other than a designated area, will be regarded as having condoned the offence.

## **WELFARE OF EMPLOYEES**

The Directors and Management of the Company are concerned for the welfare of the employees and a periodic review of arrangements will take place. This is carried out in conjunction with the HR Department.

## **INSPECTIONS**

Inspections of the shopping centres are made by those with responsibility for Health, Safety and Welfare and include Facilities Management team, and various other C&R employees with control responsibilities. Report findings and conclusions are carefully monitored to ensure compliance with relevant legal provisions and the company safety policy.

## **MONITORING**

Monitoring of systems and areas of concern enable the Company to review its Policy, thereby ensuring that changes in staff, location, materials or equipment do not introduce unforeseen hazards, also enabling performance to be measured for particular areas of control. More detailed audits will be carried out by an external consultant on annual basis.

## **SAFETY SUGGESTIONS**

The company welcomes constructive safety suggestions which seek to improve Health, Safety and Welfare matters and will have regard to any suggestions received. In addition, employees / contractors should be encouraged to enter maintenance/H&S issues requiring attention into a site Defects Log, having first informed their immediate supervisor.

## **CHEMICALS & SUBSTANCES**

The Company carries out assessments of substances used in accordance with the Control of Substances Hazardous to Health Regulations 2002, the information being recorded by the main contractor at each site

Assessments consider storage, handling, aspects of use, exposure, workers health, and emergency actions. Remedial actions being taken where identified. Supervisors will brief staff on any hazard or substance precaution, with written records being located in an accessible location within each Department.

## **MAINTENANCE**

Advice on maintenance, repairs or related inspection of plant or equipment supplied at work is available from the NGEM or maintenance service providers. This especially applies to more potentially hazardous equipment, machines, electrical equipment, portable apparatus, etc.

Any item which is defective should not be used and should be notified to the Site Manager in the first instance and the NGEM where necessary. Any machine causing injury should be examined by a competent person following any accident and a report written on its condition.

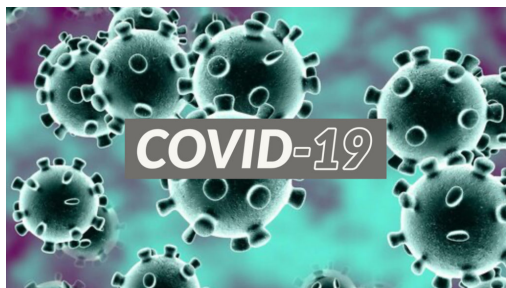
## **HEALTH & SAFETY LEGISLATION**

The Health and Safety at Work Etc. Act 1974, is the main piece of legislation, and applies to all work places, whatever their size or business and to everyone at work. The act requires employers, to ensure so far as is "reasonably practicable" the health, safety and welfare of their employees and anyone else who may be affected by their work (e.g. contractors and public). Many regulations governing general safety, equipment

etc are made under this Act, and guidance on specific issues can be obtained from the NGEM on 07766-205135.

## **RISK ASSESSMENTS**

Risk Assessments are a vital part of our Health and Safety Systems. The Company assesses risks to the health and safety of it's employees, visitors, customers and contactors - this means thinking systematically about all areas of the business and our activities.



# **COVID-19 POLICY AND PROCEDURES**

This section outlines our approach to the current and ongoing COVID-19 pandemic, including our strategy for managing our centres, our capacity management system, our COVID staff risk assessments and also our COSHH statement. This will be updated as and when required closely following current government guidance.

## **The Start of Lockdown - Introduction**

Following the introduction of the Government lockdown strategy on 23<sup>rd</sup> March 2020 in response to the COVID-19 pandemic, only key essential retailers were allowed to remain open in our centres. This resulted in the majority of our retail customers closing with immediate effect until the lockdown was reduced or lifted completely. Should any further lockdowns be required the same process will be followed (updated October 2021).

## **Initial Lockdown – immediate actions undertaken**

As part of the C&R response to the Government lockdown, the following was undertaken.

- Full review of essential PPM required was completed eg fire alarms, sprinklers
- Major Plant Items that were not required were switched off eg air conditioning.
- All fabric repairs and refresh were put on hold
- Lighting levels were reviewed in areas not in use but maintained at safe levels

- All life safety systems and statutory maintenance were still being completed
- All lifts and escalators maintenance continued as planned
- Water Systems – were being regularly flushed and maintained by Specialist Contractor, however Cooling Towers (where insitu) were switched off and will be chlorinated before being brought on line.
- Other non essential M&E services will be soft started as appropriate to prevent high power inrush.
- A deep clean of all touch points was carried out prior to re-opening and is continuing to be carried out.

## Centre Operations through COVID lockdown and easing of lockdown

### Our six readiness essentials

In this next phase of recovery, our centre are focused on six primary areas which are:-

1. **Building Safety**
2. **Staffing**
3. **Access Control - Contractors**
4. **Managing Centre Capacity and Social Distancing.**
5. **Touch Points and Cleaning**
6. **Communication for Confidence.**

### 1. BUILDING SAFETY

Each of our retailers have been approached to discuss the COVID secure requirements as outlined below:

- Discuss the business operating plan with the centre team, particularly any elements that impact shared areas outside of the store.
- Check emergency systems in liaison with the centre team - fire alarms, sprinkler valves and exit routes. A pre-opening sign-off will be required by the centre team and will follow the points detailed in the checklist below.
- Demonstrate and explain any safety measures employed where normal entry / exit doors may be closed off during trading periods.
- Agree a communication plan with the centre to pre-advise on any changes to the operating plan during trading periods which may impact on the centre's shared areas e.g. crowd control, queuing, blocking neighbouring shops entrances/thresholds.
- Keep in touch with centre management on any changes requiring the centre support.

ITEM	QUESTION	(TICK)		COMMENTS
		YES	NO	
1	Are fire doors, fire exits, fire equipment and fire notices within the demise kept unobstructed?			
2	Has the fire alarm system been tested (weekly test)			
3	Is the Sprinkler System operational and zone valves open			
4	Is the fire panel operational with no faults showing			
5	Does the fire panel interface with the centre's fire panel? Please review and agree the revised procedures on dealing with store evacuation and muster points.			
6	Have all toilet systems and water systems been adequately flushed through			
7	Is the business COVID19 secure and has adequate social distancing policy been agreed and in place for staff and shoppers, and is clearly displayed for all to understand.			
8	Has any required maintenance on electrics been carried out which may have been due during lockdown e.g. PAT testing, fire extinguishers			
9	Are waste materials from any restock - removed from the demise with no unnecessary build up of waste.			
10.	Full review/discussion on queue management both inside and outside the store completed with adequate procedures in place.			
11	Ensure good ventilation. Where supply and extract ventilation systems are installed these should be on full fresh air mode, where installed			
12	– Agree an emergency reporting procedure if a member of staff is taken ill with suspected COVID19.			

We are committed to and will:-

- Continue to employ increased frequency contact-point cleaning with suitable solutions and materials covering all the touchpoints within the centre
- Provide sanitising hygiene stations for guests at key points around the centre.
- Provide all centre employed staff with hand and face protection equipment.
- Restrict waste from mall areas through removal of waste bins.
- Require commercial landfill waste from tenants to be presented in sealed waste bags.

## 2 STAFFING

Our security, cleaning and management teams will be fully deployed in helping manage the requirements of our enclosed mall spaces to the required guidelines.

As frontline staff they will be equipped to protect themselves and our guests to manage the common area spaces safely. We aim to ensure we deliver a safe and pleasant shopping experience which is in everyone's interest.

### 3 ACCESS CONTROL – CONTRACTORS

- Contractor access to the centre will be controlled to meet our social distancing requirements.
- Contractor works in Mall areas will be restricted to out of hours to prevent conflict with controls in place for guest's access and movement.
- **CONTRACTORS WORKING ON BEHALF OF** a retailer will be expected to complete the normal 'retailer notification of works and share the relevant method statement for the work which should include a description on how the work will apply social distancing.
- The number of people that will be able to access the Security Control room area will be restricted and will require only one representative of the contractor team working on-site to attend for site induction and work permit completion.

Any work required on service areas will need to be segregated to provide a dedicated work area with controlled access.

### 4 MANAGING CENTRE CAPACITY AND SOCIAL DISTANCING

The centres will rigorously follow the guidelines provided by the authorities to: -

- Manage centre capacity at entry points if required
- Manage the number of guests in the centre to accommodate social distancing measures.
- Restrict dwell time and close contact by removing all public seating facilities.
- Monitor high demand areas in the centre and control access to prevent crowding.
- Provide regular restriction messaging through signage, pre-recorded and/or live tannoy announcements and advertising screens where available.
- Centre staff will support in encouraging guests to act responsibly.
- Mall areas will be marked up to optimise directional flow and guest capacity with floor markers including arrow, distancing reminders and 'keep left' discipline.
- Toilet facilities will have restricted access to facilitate social distancing measures.
- Escalator and stairs will adopt flow segregation and distancing markers to assist guests spacing.
- Lifts will have passenger numbers limited and prioritised to guests with mobility equipment, families with children or elderly.

Centre capacity will be monitored through footfall entrance counting and supervision of mall densities by the Duty Manager.

## **5 TOUCH POINTS AND CLEANING**

Touch points located throughout the centre and its facilities will be subject to enhanced cleaning routines. Touch points will include:-

- Manual doors in public and staff areas which, are unable to be held open
- Automatic doors will be held open to permit access where practicable to reduce contact
- Lift buttons and escalator handrails.
- Stair handrails
- All other touch points used by multiple people eg car park pay machines

Hygiene Control will include: -

- Sanitising stations for guests at key points located around the centre.
- Hand and face protection equipment for all centre employed staff.
- Removal of waste bins from mall areas.
- A requirement for commercial landfill waste from tenants to be presented in sealed waste bags.

## **6 COMMUNICATION FOR CONFIDENCE**

It is important to recognise the potential fear in returning guests and employees to the centre therefore we ensure all our communication is transparent and provides clear concise instructions to guests and our staff on a regular basis to build public confidence so they feel safe in our centre and can see the increased measures we all have adopted. The centre has developed a suite of instructional messages, which will be displayed throughout the centre with a key focus on respecting all our teams. The centre will have greeters at entrance thresholds providing guidance and support to visiting guests. We will adapt our plans based on updated/new guidance, feedback and physical observation as per required.

Our marketing team communication with our guests via social media and website channels and will assist retailers with any promotional messages required.

### **Graphics/Marketing Material and Social Media Messaging**

Many of the above operational requirements will require supporting material in terms of graphics, posters and media messaging. These are now all in place.

## **CAPACITY MANAGEMENT IN OUR CENTRES**

Following the introduction of the Government lockdown strategy on 23<sup>rd</sup> March 2020 in response to the COVID-19 pandemic, up until 15<sup>th</sup> June 2020 only access to key essential retailers was required in our centres.



As the government restrictions were eased our centres were in a position to move quickly to re-energise the centre in a safe and controlled manner adhering to government guidelines. This section explains the process of capacity management, taking into consideration the current guidance. Please note as further information is released from the government our plans may need to be adapted to accommodate further advice.

## WHAT IS CAPACITY MANAGEMENT

Current government advice is that people must maintain social distancing of at least 2m from another person, unless that person is part of your household. This therefore requires the centre to operate a process whereby our guests are able to do so in a safe manner, whilst also allowing them safe access to the shops which are open.

Therefore in order to do this, the centre will need to dynamically manage the number of guests in our centres.

## CAPACITY MANAGEMENT BY NUMBERS

The capacity number for each centre has been calculated for the public accessible mall areas only and the adoption of two factors, the space required per person and the average guest party size.

The space is determined to meet the social distancing requirements of 5.5 square metres per person/party. As a proportion of our guests are likely to visit in family groups we have included for the known average 'party size' of 1.8 persons.

EG

A public accessible Mall Area totalling 5000 sq. metres divided by 5.5 square metres = 909 guests. This has been further multiplied by 1.8 people/party size to establish an estimated guest capacity of 1,636.

A calculated capacity will not prevent clustering at high demand shops or facilities but will ensure guests have the ability to socially distance themselves safely whilst in our centre.

Tenanted areas have not been included in the capacity calculations as these are not under our direct control and subject to closure at minimal notice and potentially ongoing closure for some business types. This element will be relevant when actively managing mall population density during trading periods.

The calculated capacity will be constantly monitored and can be modified as we review the physical management of the mall areas taking into consideration the progressive opening of tenanted areas.

The Capacity calculation for each centre based on the above has been calculated and communicated to each centre team and forms the basis of the system.

## **MONITORING CAPACITY – THROUGH FOOTFALL**

We have engaged with a footfall monitoring provider to assist us in managing capacity through an online reporting tool using real time data.

A Real-Time Occupancy tracking solution will enable our centres to accurately understand shopper density across the shopping centre, helping us to comply with local or government regulations to adhere to social distancing guidelines, stay within maximum limits and optimise traffic management strategies.

The footfall tracking system will enable us to understand when our shopping centre is approaching maximum occupancy with easy an easy to use dashboard and 15-minute interval data recording.

Nominated Managers will receive an automatic email notification at 75% (Amber) and 90% (Red) occupancy levels which will allow time to actively review capacity through management observation and if necessary, implement control measures to manage the access.

To meet social distancing measures the centre will use the capacity traffic light alert system to safely control the number of guests in the centre at any point in time and provide clear guidance to our guests and the local community prior to and on arrival through social media and website communication channels.

The following messages will be communicated to guests: -

**Red Status** – Shopping Centre has reached shopper capacity – please join the queue to safely enter the centre expect to queue externally to gain access

**Amber Status** – Shopping Centre is near to reaching shopper capacity – please be prepared to queue to safely enter the centre.

**Green status** – shopping centre is free flowing - no queues, a good time to shop

By operating this real time alerting Red, Amber, Green system, it allows the centre to consider adjusting occupancy thresholds to support social distancing guidelines.

The decision as to whether or not a centre has reached its capacity, will be a combination of the above, and also the visual observation of guest movement and density in all areas.

## **ACTIVE CAPACITY MONITORING THROUGH DYNAMIC VISUAL OBSERVATION**

Each centre will have a Duty Manager, whose sole purpose is to monitor visually the guest's movements and their ability to maintain social distancing. Our capacity number does not take into account the guests

who may be in the shops, and as a result of this, it allows the capacity management to be dynamic and fluid one, highly responsive to the actual situation on the ground and in any specific hot spots of the centre.

If the centre footfall capacity is nearing its limit, the Duty Manager is authorised to immediately instruct restrictions on entry to one guest out- one guest in. They will also have the ability to disperse and manage guests if they are congregating in a particular area of the centre to help ensure that social distancing is maintained.

Please note that where the centre needs to control the guests at the entrances, this may cause queuing in the outside the centre, so centres are advised to liaise with the Local Authority to arrange the necessary floor markings.

The process for capacity management is a combination of technology and observation. As more information and guidance is released by government, this process will adapt and evolve over the coming months. As more shops open, our plans will also need to be reviewed.

Our front facing teams will be assisting in managing access and egress, and will also be encouraging guests to maintain the social distancing rule.

## **CENTRE COVID-19 RISK ASSESSMENTS**

Each Centre has produced a centre specific health and safety risk assessment which is held on our on line C&R Safe web platform. Each assessment was discussed with the local authorities. This includes the measures taken to ensure social distancing and hygiene compliance. These are available on request.

In addition, each member of the team underwent a covid risk assessment to take into account any personal circumstances, and to ensure the COVID-19 procedures were fully understood.

## **SUPPORT OFFICE COVID-19 RISK ASSESSMENTS**

An additional risk assessment has been completed for the Support Office, including social distancing requirements and procedures and hygiene compliance. In addition, each employee underwent a personal risk assessment and return to the office 1:1 discussion. The Risk assessment is available upon request.

## **COVID 19**

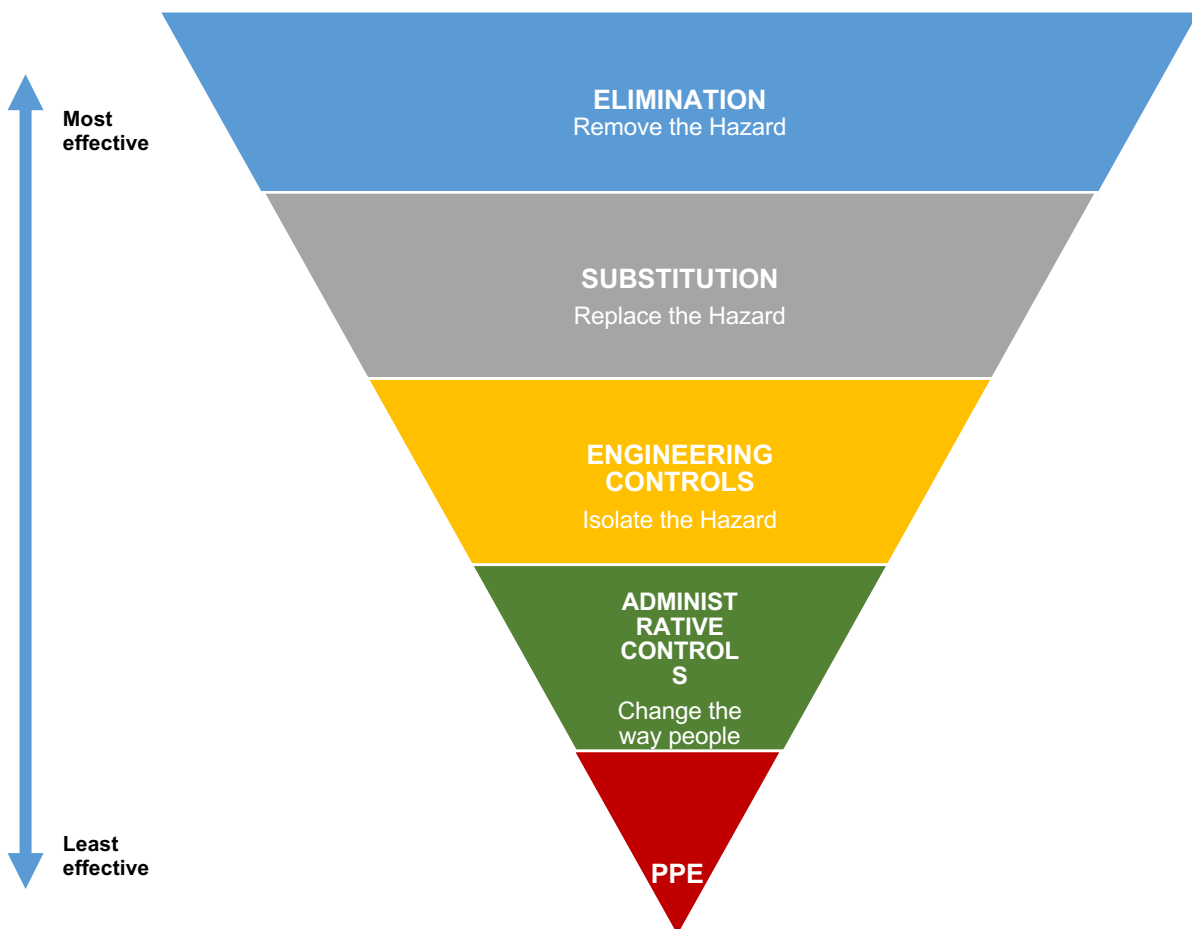
### **COSSH STATEMENT:**

## **INTRODUCTION**

Covid-19 is classed as a “biological agent” for the purpose of Regulation 2 of the *Control of Substances Hazardous to Human Health Regulations 2002* and includes any micro-organism which may cause infection. This is broad enough to include Covid-19.

As a result, our centres have undertaken a risk assessment and considered the Hierarchy of Control in compliance with these Regulations, and the main points of this are highlighted below.

## THE HIERARCHY OF CONTROL



## **Elimination – Remove the Hazard**

Covid-19 cannot be removed or eliminated at this current time. So we are working to avoid contact with the hazard, and following all government guidance in relation to self-isolation rules and avoiding unnecessary travel and working from home where possible.

## **Substitution – Replace the Hazard**

The hazard cannot be replaced, so we are substituting it by changing our work processes by introducing social distancing measures and remote working where possible. Our hygiene and sanitizing stations are in place at strategic touch point locations.

## **Engineering Controls – Isolate the Hazard**

We have isolated the hazard by introducing social distancing, one-way systems, queue management systems, and occupancy alert systems. We have also assessed each work area and introduced screens and have access to thermometers to allow temperature monitoring of our teams. We follow government guidance on self-isolation with any of our team who display symptoms.

## **Administrative Controls – Change the way people engage**

We have signs, posters, information on our websites and social media pages giving clear, information and instruction to all our guests and customers. We have also trained our teams on the COVID symptoms, operational plans including one-way systems.

## **PPE – Personal Protective Equipment**

As the final level of hierarchal control - PPE is available and accessible to all our teams members including gloves, face masks, face visors, social distancing vests, hand sanitiser and access to sanitising stations.

**We will continue to monitor our centres with regards to social distancing controls by a combination of our Occupancy Alert footfall system and visual observation.**

**We will also be strictly adhering to all Government Guidance to ensure we are COVID-19 Secure and will adapt our policies and procedures in response to any government guideline changes.**

**PART 3**

**CAPITAL & REGIONAL**  
**HEALTH AND SAFETY ARRANGEMENTS**  
**FOR WHOLLY OWNED OPERATING**  
**BUSINESSES**

**SNOZONE**



**CAPITAL &  
REGIONAL**

**AVAILABLE ON REQUEST**