

# Shaftesbury PLC

## Corporate Responsibility

### Action Plan

**2009-10**



**RPS**

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## 1.0 Overall Policy Goals

*Note: The timeframe of 2009–2010 for implementation of the objectives and targets is consistent with the financial year, which is 1<sup>st</sup> October 2009 to 30<sup>th</sup> September 2010.*

### Policy Goal A: Disseminate the Corporate Responsibility Policy and Promote Staff and Principal Supplier Awareness

Number	Objectives	Targets 2009-10	Personnel Responsible
<b>A1</b>	<b>Disseminate the Policy to all the Company’s staff, managing agents, contractors, and tenants and ensure that it is available to the public</b>	• Ensure Policy and Tenants’ Leaflet continues to be issued to all new commercial tenants as part of tenant’s pack.	Managing agents
		• Ensure Contractors’ Leaflet is issued as part of all refurbishment contracts	Shaftesbury/Project Managers
<b>A2</b>	<b>Provide appropriate training and awareness to staff and principal suppliers</b>	• Undertake update awareness training of all personnel and key suppliers by November 2010.	RPS/Shaftesbury
		• Continue to issue the following checklists to the Principal Suppliers: <ul style="list-style-type: none"> <li>- Contractors Checklist</li> <li>- Specification Checklist</li> <li>- Legal Compliance Checklist</li> </ul>	RPS/Shaftesbury

**Policy Goal B: Review the Policy on an annual basis and report on the Company's performance**

Number	Objective	Targets 2009-10	Personnel Responsible
<b>B1</b>	<b>The Policy will be reviewed on an annual basis and objectives and targets will be set.</b>	<ul style="list-style-type: none"> <li>• Set objectives and targets for 2009-10</li> <li>• Review Policy May 2010 for approval at the Board meeting in July 2010</li> </ul>	RPS/Shaftesbury
<b>B2</b>	<b>The Company will monitor and report publicly on its performance</b>	<ul style="list-style-type: none"> <li>• Report performance against Action Plan on Company website, as appropriate</li> <li>• Include summary of performance in Annual Report 2009-10</li> <li>• Undertake annual audit in August – September 2010 to monitor performance against the Policy and Action Plan</li> </ul>	RPS/Shaftesbury

## 2.0 Environmental Responsibility

### Policy Goal C: Comply with Legal Requirements

Number	Objectives	Targets 2009-10	Personnel Responsible
<b>C1</b>	<b>Comply with all legal and regulatory requirements</b>	<ul style="list-style-type: none"> <li>Review legislation checklists to ensure are current.</li> <li>Monitor environmental compliance on refurbishment and construction projects for 2009-10 using checklist</li> <li>Achieve zero non-compliance for 2009-10</li> </ul>	RPS to liaise with: <ul style="list-style-type: none"> <li>Shaftesbury</li> <li>Project Managers</li> <li>Managing agents</li> </ul> All above

### Policy Goal D: Prior to purchase, environmental audits are conducted where appropriate

Number	Objectives	Targets 2009-10	Personnel Responsible
<b>D1</b>	<b>Undertake environmental/building health surveys of properties prior to purchase if appropriate</b>	<ul style="list-style-type: none"> <li>Ensure environmental/building health surveys are utilised to screen properties prior to purchase of all properties including risks from climate change, flooding, rising water tables and localised flooding.</li> <li>Audit findings of surveys.</li> </ul>	Shaftesbury/ Project Managers  RPS at annual audit
<b>D2</b>	<b>Continue to maximise use of 'brownfield' land in central London</b>	<ul style="list-style-type: none"> <li>Continue to achieve 100% use and regeneration of 'brownfield' land during expansion and refurbishment of portfolio.</li> </ul>	Shaftesbury

**Policy Goal E: Minimise environmental impacts and operate in an environmentally sustainable manner during management of properties**

Number	Objectives	Targets 2009-10	Personnel Responsible
<b>E1</b>	<b>Monitor and where possible reduce energy consumption and investigate opportunities for the use of renewable energy</b>	<ul style="list-style-type: none"> <li>Continue to monitor energy consumption in Shaftesbury Head Office and common parts of portfolio.</li> </ul>	<ul style="list-style-type: none"> <li>Managing agents to collect data</li> <li>RPS to collate for reporting baseline</li> </ul>
		<ul style="list-style-type: none"> <li>Maintain a watching brief to see if green tariff electricity is a financially viable option for use in Common Parts.</li> </ul>	Managing agents/Shaftesbury
		<ul style="list-style-type: none"> <li>Continue to monitor use of long life light bulbs within common parts of managed portfolio – aim for 100% utilisation.</li> </ul>	Managing agents
<b>E2</b>	<b>Monitor and, where possible, minimise water consumption</b>	<ul style="list-style-type: none"> <li>Investigate opportunities for including water meters in properties in Berwick St portfolio, where appropriate.</li> </ul>	MJ Mapp
		<ul style="list-style-type: none"> <li>Monitor water use in Carnaby/Seven dials common parts – aim for 75% reporting of readings.</li> </ul>	<ul style="list-style-type: none"> <li>EA Shaw to collect data</li> <li>RPS to collate for reporting baseline</li> </ul>
		<ul style="list-style-type: none"> <li>Monitor water use for South Service yard in Chinatown.</li> </ul>	NB Real Estate

Number	Objectives	Targets 2009-10	Personnel Responsible
<b>E3</b>	<b>Monitor and reduce waste from its managed properties including the Head Office</b>	<ul style="list-style-type: none"> <li>Maintain discussions with Westminster CC for identifying residential recycling point within Chinatown.</li> </ul>	Shaftesbury/NB Real Estate
		<ul style="list-style-type: none"> <li>Encourage restaurant tenants within Chinatown, Canaby/Seven Dials to use the waste oil collection service.</li> </ul>	Shaftesbury/NB Real Estate/EA Shaw
		<ul style="list-style-type: none"> <li>Continue to monitor data for waste collection for existing facilities in Carnaby and Seven Dials.</li> </ul>	<ul style="list-style-type: none"> <li>EA Shaw to collate data</li> <li>RPS to utilise for reporting</li> </ul>
		<ul style="list-style-type: none"> <li>Continue to investigate ways of providing additional recycling facilities for tenants in Carnaby and alternative waste disposal options.</li> </ul>	Shaftesbury/EA Shaw
		<ul style="list-style-type: none"> <li>Maintain watching brief within Berwick St to see if a central recycling point could be provided by Shaftesbury for office tenants.</li> </ul>	Shaftesbury/MJMapp
		<ul style="list-style-type: none"> <li>Continue to monitor volume of paper sent for recycling from Head Office.</li> </ul>	Shaftesbury/RPS
		<ul style="list-style-type: none"> <li>Continue to monitor volume of paper purchased.</li> </ul>	Shaftesbury/RPS
<b>E4</b>	<b>Ensure that contractors (including cleaners, maintenance personnel etc. comply with the Company Policy</b>	<ul style="list-style-type: none"> <li>Continue to issue Induction Leaflet to all contractors working on portfolio throughout 2009-10.</li> </ul>	<ul style="list-style-type: none"> <li>Shaftesbury</li> <li>Managing agents</li> </ul>
		<ul style="list-style-type: none"> <li>Maintain documented audit trail of contractors that have received leaflet.</li> </ul>	<ul style="list-style-type: none"> <li>Managing agents to keep records</li> <li>RPS to audit</li> </ul>
<b>E5</b>	<b>Remove and dispose of hazardous materials e.g. asbestos in accordance with relevant legislation</b>	<ul style="list-style-type: none"> <li>Ensure up to date asbestos register is held for managed portfolio.</li> </ul>	<ul style="list-style-type: none"> <li>Managing agents to maintain asbestos register</li> </ul>
		<ul style="list-style-type: none"> <li>Retain copies of waste transfer notes and record volume of hazardous waste disposed to landfill</li> </ul>	<ul style="list-style-type: none"> <li>Managing agents to collate hazardous waste data</li> <li>RPS to audit</li> </ul>

**Policy Goal F: Shaftesbury PLC expects its contractors, as supervised by its consultants to adopt 'best environmental practice' in the refurbishment of the Company's property portfolio.**

Number	Policy Objectives	Targets 2009-10	Personnel Responsible
<b>F1</b>	<b>To operate in an environmentally sustainable manner throughout its activities</b>	<ul style="list-style-type: none"> <li>Continue to refurbish existing buildings and promote the re-use of materials to reduce the need to introduce additional 'embodied' carbon.</li> </ul>	Shaftesbury
		<ul style="list-style-type: none"> <li>Continue to assess the applicability for renewable energy technologies to be incorporated into new developments.</li> </ul>	Shaftesbury/Project Managers
		<ul style="list-style-type: none"> <li>Aim for BREEAM Very Good for the Longmartin development on its completion.</li> </ul>	Shaftesbury/SPPM
<b>F2</b>	<b>Efficient use of energy and water</b>	<ul style="list-style-type: none"> <li>Project managers to utilise revised Specification and Contractor's checklists for all projects above £75,000.</li> </ul>	RPS/Project Managers
		<ul style="list-style-type: none"> <li>Set an in-house target for the inclusion of a certain proportion of internal energy efficient lights in all refurbishment projects.</li> </ul>	RPS/Project Managers
		<ul style="list-style-type: none"> <li>Set an in-house target for the inclusion of a certain proportion of water efficiency measures over and above the requirements of Building Regulations.</li> </ul>	RPS/Project Managers

Number	Policy Objectives	Targets 2009-10	Personnel Responsible
<p><b>F3</b></p>	<p><b>Timber will be sourced, where possible, from well managed sources certified by third party certification bodies</b></p>	<ul style="list-style-type: none"> <li>• Continue to maximise proportion of timber that is reused within projects and monitor for reporting purposes.</li> <li>• Contractors to retain all timber supply invoices and ensure that full chain of custody details are recorded.</li> <li>• RPS to collate information to identify proportion sourced from certified timber</li> <li>• Ensure that 100% of hardwood timber is sourced from a certified sustainable source.</li> <li>• Ensure that preferred suppliers demonstrate sourcing of a minimum of 50% of other types of timber from a certified sustainable source.</li> <li>• Aim for suppliers to source a minimum of 10% timber from an FSC certified source.</li> </ul>	<ul style="list-style-type: none"> <li>• Project managers</li> <li>• RPS to audit</li> <li>• Project Managers to ensure contractors retain invoices</li> <li>• RPS to collate</li> <li>• Shaftesbury /Project Managers</li> <li>• RPS to audit</li> <li>• Shaftesbury /Project Managers</li> <li>• RPS to audit</li> <li>• Project managers</li> <li>• RPS to audit</li> </ul>
<p><b>F4</b></p>	<p><b>Management and disposal of construction waste</b></p>	<ul style="list-style-type: none"> <li>• Continue to monitor construction waste generated data for all projects above £75,000.</li> <li>• Project managers to ensure waste transfer notes retained as part of contract documentation.</li> <li>• Ensure that all contracts above the legal threshold of £300,000 complete an appropriate Site Waste Management Plan.</li> <li>• RPS to repeat duty of care of 10% of waste contractors used for refurbishment contracts. Selected contractors to be agreed by November 2009 and audits to be undertaken by March 2010.</li> </ul>	<ul style="list-style-type: none"> <li>• Project managers</li> <li>• RPS to audit</li> <li>• RPS/Project Managers</li> </ul>

Number	Policy Objectives	Targets 2009-10	Personnel Responsible
F5	<b>For projects of capital value over £75,000, and in excess of six weeks duration, Shaftesbury will sign up to Considerate Constructors Scheme. (NB. Schemes that only involve external repair and decoration will not be included)</b>	<ul style="list-style-type: none"> <li>Ensure all eligible schemes are signed up for 2009-10</li> <li>Project managers to advise contractors of areas for improvement by December 2009.</li> <li>Project managers to mentor poor performing contractors.</li> <li>RPS to work with selected contractors to devise site specific environmental policies.</li> <li>Improve on performance in 2009-10 by achieving a minimum score of 26/40 (above satisfactory performance) on 80% of schemes audited.</li> <li>RPS to audit results &amp; identify any areas for further improvement in 2010.</li> </ul>	<ul style="list-style-type: none"> <li>Shaftesbury/ Project Managers/RPS</li> <li>RPS to audit</li> </ul>
F6	<b>Consider management and maintenance of planting and landscape, if appropriate.</b>	<ul style="list-style-type: none"> <li>Improve biodiversity within existing portfolio through use of bird nesting boxes at appropriate locations.</li> </ul>	<ul style="list-style-type: none"> <li>Shaftesbury/RPS to identify locations</li> <li>Managing agents/Project managers to implement</li> </ul>
F7	<b>During construction the Company through its Project Managers will endeavour to minimise adverse impacts on the environment</b>	<ul style="list-style-type: none"> <li>Continue to provide all contractors with a copy of the Company Policy &amp; Specification questionnaires etc. in tender documentation</li> <li>Continue to issue Induction Leaflet to all contractors working on portfolio.</li> <li>Maintain documented audit trail of contractors that have received leaflet.</li> <li>Provide good practice Guidance to tenants for use by their contractors during fit outs etc. which reflects Shaftesbury's policies. To be developed and trialled at Longmartin for 2009 -10.</li> </ul>	<ul style="list-style-type: none"> <li>Project managers</li> <li>Project managers to issue</li> <li>Project managers to keep records</li> <li>RPS to audit</li> <li>Shaftesbury/Project managers</li> </ul>

### 3.0 Social Responsibility

**Policy Goal G: Shaftesbury will conduct its business with integrity**

Number	Objectives	Targets 2009-10	Personnel Responsible
<b>G1</b>	<b>Be honest, open, helpful and polite</b>	<ul style="list-style-type: none"> <li>Remain in FTSE4Good Index for 2009-10.</li> <li>Remain in Dow Jones Sustainability Index for 2009-10.</li> <li>Engage with key investors and other benchmarking agencies as appropriate.</li> </ul>	Shaftesbury/RPS
<b>G2</b>	<b>Provide the standards of accommodation and services that have been agreed</b>	<ul style="list-style-type: none"> <li>Continue to maintain existing constant liaison between tenants, managing agents &amp; Shaftesbury.</li> </ul>	Shaftesbury surveyors/Managing agents
<b>G3</b>	<b>Obey all relevant laws and regulations and comply with other key policy goals with regard to customer relations.</b>	<ul style="list-style-type: none"> <li>Achieve 100% compliance.</li> </ul>	Shaftesbury

**Policy Goal H: Shaftesbury recognises the need for investing in its employees and provides opportunities for training and personal development**

Number	Objectives	Targets 2009-10	Personnel Responsible
<b>H1</b>	<b>Ensure all employees have a performance review annually</b>	<ul style="list-style-type: none"> <li>Shaftesbury to continue annual system of formal annual staff appraisal.</li> <li>Continue to provide CR awareness training to all staff and key suppliers with annual awareness training.</li> </ul>	Shaftesbury/RPS

**Policy Goal I: Shaftesbury is committed to providing its employees with safe and favourable working conditions that are free from unnecessary risk.**

Number	Objectives	Targets 2009-10	Personnel Responsible
<b>I1</b>	<b>Fully comply with all the requirements of the Health &amp; Safety at Work Act 1974 etc. for employees and those that may be affected by its activities</b>	<ul style="list-style-type: none"> <li>• Ensure health &amp; safety induction training is being undertaken by contractors for 100% site staff including use of contractor induction leaflets.</li> <li>• Achieve zero reportable accident/incidents throughout 100% of the portfolio.</li> <li>• Ensure findings of Considerate Constructors Scheme are implemented at 100% of projects:                             <ul style="list-style-type: none"> <li>- Demonstrate written contact to neighbours at start of contract</li> <li>- Documented policies in place re. swearing and smoking</li> <li>- First aiders appropriately identified</li> <li>- Records of medical conditions kept on site</li> <li>- Adequate welfare facilities provided</li> </ul> </li> <li>• Ensure 100% of eligible sites have at least one external audit by CCS (includes health &amp; safety criteria).</li> <li>• Provide documented audit trail.</li> </ul>	<ul style="list-style-type: none"> <li>• Project Managers</li> <li>• RPS to audit</li> </ul> Project Managers          Project Managers          RPS to audit

**Policy Goal J: Shaftesbury is committed to providing equal opportunities for all its employees and potential employees**

Number	Objective	Targets 2009-10	Personnel Responsible
J1	<p><b>Monitor the effectiveness of the equal opportunities policy and comply with all the key employment legislation such as:</b></p> <p><b>Sex Discrimination Act, Race Relations Act, Disability Discrimination Act, Human Rights Act, Employment Equality Regulations etc.</b></p>	<ul style="list-style-type: none"> <li>Monitor approach to internal staff management &amp; recruitment to ensure compliance with equal opportunities policy and other key employment legislation.</li> </ul>	Shaftesbury

## 4.0 Community Engagement

**Policy Goal K: Shaftesbury is committed to being a good corporate citizen within its local community through both charitable giving and engagement**

Number	Objectives	Targets 2009-10	Personnel Responsible
K1	<b>Continue to apply the spirit of the now disbanded Per Cent Club and will continue to align its charitable giving and community involvement to its chosen areas of investment in the heart of London’s West End.</b>	<ul style="list-style-type: none"> <li>Ongoing financial support to key charities and community support for 2009-10.</li> </ul>	Shaftesbury
		<ul style="list-style-type: none"> <li>Barnados has been identified as the preferred charity for 2009-10 and specific events will be organised throughout the year.</li> </ul>	Shaftesbury
K2	<b>Shaftesbury will continue to engage with the local community through the provision of advice and resources.</b>	<ul style="list-style-type: none"> <li>Ongoing support to nominated charities through staff involvement for 2009-10.</li> </ul>	Shaftesbury
		<ul style="list-style-type: none"> <li>Continue to provide office space for small charities within whole portfolio.</li> </ul>	
		<ul style="list-style-type: none"> <li>Continue to support and provide facilities for up and coming artists and fashion designers.</li> </ul>	
		<ul style="list-style-type: none"> <li>Continue to work with statutory bodies through financial support to improve the local environment e.g. lighting projects, pavement maintenance etc. Extend support to Chinatown and other schemes in Carnaby/Seven Dials.</li> </ul>	
		<ul style="list-style-type: none"> <li>Continue to investigate opportunities to mentor big business in the estate and improve their community engagement.</li> </ul>	