

Shaftesbury PLC  
Corporate Responsibility  
Action Plan 2012-13



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Note: The timeframe of 2011–2012 for implementation of the objectives and targets is consistent with the financial year, which is 1<sup>st</sup> October 2012 to 30th September 2013.

## 1.0 Stakeholders and Our Local Community

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

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
A1	<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>	<ul style="list-style-type: none"> <li>Ensure Policy continues to be issued to all new commercial tenants as part of tenants pack.</li> </ul>	Number of new tenants receiving Policy	Managing agents
		<ul style="list-style-type: none"> <li>Ensure Contractors’ Leaflet is issued as part of all refurbishment contracts</li> </ul>	% of contractors receiving contractors leaflet	Shaftesbury/Project Managers
A2	<b>Provide appropriate awareness raising and engagement with tenants within the portfolio</b>	<ul style="list-style-type: none"> <li>Replace Tenants’ leaflet with a more detailed Sustainability Guide for commercial tenants as part of Insurance Pack</li> <li>Ensure Sustainability Leaflet for residential tenants is included in all new letting packs</li> </ul>	<ul style="list-style-type: none"> <li>Number of commercial tenants receive Sustainability Guide</li> <li>Number of residential tenants that receive leaflet</li> </ul>	Shaftesbury/ Managing agents

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
		<ul style="list-style-type: none"> <li>• Provide subsidised two year membership of Sustainable Restaurant Association (SRA) for every new restaurant tenant</li> <li>• Undertake test case review of success of use of SRA Restaurant Fit Out by tenant at Newman Street Tavern</li> </ul>	<ul style="list-style-type: none"> <li>• Number of new restaurant tenants registered with SRA</li> <li>• Feedback on use of SRA Fit Out Guide</li> </ul>	Shaftesbury
<b>A3</b>	<b>Provide appropriate training and awareness to staff and principal suppliers</b>	<ul style="list-style-type: none"> <li>• Undertake update awareness training for all personnel and key suppliers by November 2013.</li> <li>• 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> </li> </ul>	<p>Awareness training attended by staff and suppliers</p> <p>Number of projects over £75,000 threshold where Checklists have been completed</p>	RPS/Shaftesbury

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

<b>Number</b>	<b>Objective</b>	<b>Targets 2012-13</b>	<b>Key Performance Indicator</b>	<b>Personnel Responsible</b>
<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 2012-13</li> </ul>	Action Plan reviewed	RPS/Shaftebury
		<ul style="list-style-type: none"> <li>Review Policy in May 2013 for approval at the Board meeting in July 2013</li> </ul>	Policy reviewed and approved	
<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,</li> </ul>	Report publically available	RPS/Shaftebury
		<ul style="list-style-type: none"> <li>Include summary of performance in Annual Report 2012-13</li> </ul>	Input into annual report	
		<ul style="list-style-type: none"> <li>Undertake annual audit in August – September 2013 to monitor performance against the Policy and Action Plan</li> </ul>	Audit completed	

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

<b>Number</b>	<b>Objectives</b>	<b>Targets 2012-13</b>	<b>Key Performance Indicator</b>	<b>Personnel Responsible</b>
<b>C1</b>	<b>Join the London Benchmarking Group and 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 2012-13.</li> </ul>	<ul style="list-style-type: none"> <li>List of key charities</li> </ul>	Shaftesbury
		<ul style="list-style-type: none"> <li>Select relevant benchmarking measurements</li> </ul>	<ul style="list-style-type: none"> <li>As per LBG</li> </ul>	Shaftesbury
<b>C2</b>	<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 2012-2013.</li> </ul>	<ul style="list-style-type: none"> <li>Staff hours</li> </ul>	Shaftesbury
		<ul style="list-style-type: none"> <li>Continue to provide office space for small charities within portfolio.</li> </ul>	<ul style="list-style-type: none"> <li>Office space provided</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>List of individuals supported</li> </ul>	
		<ul style="list-style-type: none"> <li>Continue to work with statutory bodies through financial support to improve the local environment and public realm 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>Value of support</li> </ul>	

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

<b>Number</b>	<b>Objectives</b>	<b>Targets 2012-13</b>	<b>Key Performance Indicator</b>	<b>Personnel Responsible</b>
<b>D1</b>	<b>Be honest, open, helpful and polite</b>	<ul style="list-style-type: none"> <li>Remain in FTSE4Good Index for 2012-13.</li> </ul>	Listing in FTSE4Good Index	Shaftesbury/RPS
		<ul style="list-style-type: none"> <li>Remain in Dow Jones Sustainability Index for 2012-13.</li> </ul>	Listing in DJSI Index	
		<ul style="list-style-type: none"> <li>Participate in GRESB survey</li> </ul>	Listing in GRESB	
		<ul style="list-style-type: none"> <li>Engage with key investors and other benchmarking agencies.</li> </ul>	Minutes of meetings/calls with investors	
<b>D2</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 regular liaison between tenants, managing agents &amp; Shaftesbury.</li> </ul>	Records of meetings	Shaftesbury surveyors/Managing agents
<b>D3</b>	<b>Comply with all relevant laws and regulations and other key policy goals with regard to customer relations.</b>	<ul style="list-style-type: none"> <li>Achieve 100% compliance.</li> </ul>	% Compliance	Shaftesbury
<b>D4</b>	<b>Ensure suppliers are paid within 30 days</b>	<ul style="list-style-type: none"> <li>Monitor payment times</li> </ul>	% of suppliers paid within timeframe	Shaftesbury



## 2.0 Environment

### Policy Goal E: Comply with Legal Requirements

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
E1	Comply with all legal and regulatory requirements	<ul style="list-style-type: none"> <li>Review legislation checklists to ensure are current.</li> </ul>	Legal checklist reviewed	RPS to liaise with: <ul style="list-style-type: none"> <li>Shaftesbury</li> <li>Project Managers</li> <li>Managing agents</li> </ul>
		<ul style="list-style-type: none"> <li>Monitor environmental compliance on refurbishment and construction projects for 2012-13 using checklist</li> </ul>	Number of projects above £75,000 monitored	
		<ul style="list-style-type: none"> <li>Achieve zero environmental non-compliance for 2012-13</li> </ul>	Number of non-compliances	All above

**Policy Goal F: Before purchase, environmental audits are conducted where appropriate**

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>F1</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 used to screen properties before purchase of all properties, including risks from climate change, rising water tables and localised flooding.</li> </ul>	Survey reports for all purchases	Shaftesbury/ Project Managers
<b>F2</b>	<b>Continue to invest only in 'brownfield' sites</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>	% of development on brownfield land	Shaftesbury

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

Number	Policy Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>G1</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> <li>• Maintain BREEAM criteria for reuse of structure and façade in 100% of refurbishment:               <ul style="list-style-type: none"> <li>○ 50% of façade reused;</li> <li>○ 80% by volume of existing primary structure reused</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• % of total façade reused</li> <li>• % by volume of existing primary structure reused</li> </ul>	Shaftesbury
		<ul style="list-style-type: none"> <li>• Continue to assess whether renewable energy technologies can be economically incorporated into future projects, including heat recovery technology.</li> </ul>	% of renewables included within refurbishment	Shaftesbury/Project Managers
		<ul style="list-style-type: none"> <li>• Aim for BREEAM Very Good for any new commercial developments.</li> </ul>	BREEAM Very Good	Shaftesbury/SPPM
		<ul style="list-style-type: none"> <li>• Pilot use of BREEAM Domestic Refurbishment on selected schemes.</li> </ul>	BREEAM Predictive assessment score	Shaftesbury/Project Managers
		<ul style="list-style-type: none"> <li>• Aim for an EPC Grade B EPC rating on new build</li> </ul>	EPC rating	Shaftesbury/SPPM
		<ul style="list-style-type: none"> <li>• Ensure in all structural refurbishments over £75,000 (excluding retail shell) that the existing EPC rating is improved by:               <ul style="list-style-type: none"> <li>○ One grade for listed buildings</li> <li>○ One grade where EPC rating is grade D</li> <li>○ Two grades for non listed building of EPC grade E or below</li> </ul> </li> </ul>	Increase in EPC rating for structural refurbishments	Shaftesbury/Project Managers

Number	Policy Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
G2	<b>Efficient use of energy and water</b>	<ul style="list-style-type: none"> <li>Project managers to use revised Specification and Contractor's checklists for all projects over £75,000.</li> </ul>	Number of schemes over £75,000 completing checklists	RPS/Project Managers
G3	<b>Timber will be sourced, where possible, from well managed sources certified by third party certification bodies</b>	<ul style="list-style-type: none"> <li>Continue to maximise proportion of timber that is reused within projects and monitor for reporting purposes.</li> </ul>	% of timber reused within refurbishment	<ul style="list-style-type: none"> <li>Project managers</li> <li>RPS to audit</li> </ul>
		<ul style="list-style-type: none"> <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> </ul>	Chain of custody information on invoices	<ul style="list-style-type: none"> <li>Project Managers to ensure contractors retain invoices</li> <li>RPS to collate</li> </ul>
		<ul style="list-style-type: none"> <li>Ensure that 100% of hardwood timber is sourced from a certified sustainable source.</li> </ul>	% of hardwood timber from a certified sustainable source	<ul style="list-style-type: none"> <li>Shaftesbury /Project Managers</li> <li>RPS to audit</li> </ul>
		<ul style="list-style-type: none"> <li>Ensure that preferred suppliers demonstrate sourcing of a minimum of 55% of other types of timber from a certified sustainable source.</li> </ul>	% of other timber sourced from a certified sustainable source	<ul style="list-style-type: none"> <li>Shaftesbury /Project Managers</li> <li>RPS to audit</li> </ul>
		<ul style="list-style-type: none"> <li>Aim for suppliers to source a minimum of 20% timber from an FSC certified source.</li> </ul>	% of FSC timber sourced	<ul style="list-style-type: none"> <li>Project managers</li> <li>RPS to audit</li> </ul>

Number	Policy Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>G4</b>	<b>Management and disposal of construction waste</b>	<ul style="list-style-type: none"> <li>Continue to monitor construction waste generated data for all projects above £75,000.</li> </ul>	Number of schemes above £75,000 collating data	<ul style="list-style-type: none"> <li>Project managers</li> <li>RPS to audit</li> </ul>
		<ul style="list-style-type: none"> <li>Project managers to ensure waste transfer notes retained as part of contract documentation.</li> </ul>	Waste transfer notes retained	
		<ul style="list-style-type: none"> <li>Ensure that all contracts above the legal threshold of £300,000 complete an appropriate Site Waste Management Plan (SWMP).</li> </ul>	Number of schemes with SWMP	
		<ul style="list-style-type: none"> <li>Aim to reuse or recycle 80% of non-hazardous demolition and construction waste by weight for projects covered by a SWMP.</li> </ul>	% of reused or recycled waste for projects with SWMP	<ul style="list-style-type: none"> <li>Project managers</li> </ul>
		<ul style="list-style-type: none"> <li>RPS to repeat duty of care of 10% of waste contractors used for refurbishment contracts. Audits to be undertaken by March 2013.</li> </ul>	Audit completed	RPS/Project Managers

Number	Policy Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>G5</b>	<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>• Require all principal contractors that work on Shaftesbury schemes to register as a company to CCS.</li> <li>• Ensure all eligible schemes are signed up for 2012-13</li> <li>• Achieve a minimum score of 26/40 (above satisfactory performance) on 100% of schemes audited.</li> </ul>	<ul style="list-style-type: none"> <li>% of Principal Contractors registered with CCS</li> <li>Number of schemes</li> <li>% of schemes above 26/40</li> </ul>	<ul style="list-style-type: none"> <li>• Shaftesbury/ Project Managers/RPS</li> <li>• RPS to audit</li> </ul>
<b>G6</b>	<b>Improve biodiversity appropriate to the Group's urban location</b>	<ul style="list-style-type: none"> <li>• Improve biodiversity within existing portfolio through use of bird nesting boxes at appropriate locations.</li> <li>• Improve biodiversity within existing portfolio through inclusion of green roofs and walls where feasible.</li> <li>• Research opportunities of supporting bees in the capital with appropriate planting in window boxes etc</li> </ul>	<ul style="list-style-type: none"> <li>• Number of schemes with bird boxes</li> <li>• Number of schemes with green walls/roofs</li> <li>• Number of window boxes within portfolio</li> </ul>	<ul style="list-style-type: none"> <li>• Shaftesbury/RPS to identify locations</li> <li>• Managing agents/Project managers to implement</li> </ul>

Number	Policy Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>G7</b>	<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> </ul>	Number of schemes completing checklists	Project managers
		<ul style="list-style-type: none"> <li>Continue to issue Induction Leaflet to all contractors working on portfolio.</li> </ul>	% of contractors receiving contractors leaflet	Project managers
		<ul style="list-style-type: none"> <li>Ensure that a minimum of 80% water based paints are used to minimise pollution.</li> </ul>	% of water based paints specified	Project managers
		<ul style="list-style-type: none"> <li>Contractors to register with Community Repaint Scheme for disposal of unused paint.</li> </ul>	% of waste paint disposed to Community Repaint	Project managers
		<ul style="list-style-type: none"> <li>Continue to ensure that there are minimal emissions to air and water given small scale and location of schemes in central London</li> </ul>		Project managers
		<ul style="list-style-type: none"> <li>Where meters available monitor energy and water use on site throughout the life of the project.</li> </ul>	Water and energy data	Project managers

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

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
H1	<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 including 50% of St Martins Courtyard.</li> </ul>	<ul style="list-style-type: none"> <li>Total energy consumption tonnes CO<sub>2</sub></li> </ul>	<ul style="list-style-type: none"> <li>Managing agents to collect data</li> </ul>
		<ul style="list-style-type: none"> <li>Aim for 5% reduction in energy consumption across the portfolio from base year of 2012 including 50% of St Martins Courtyard.</li> </ul>	<ul style="list-style-type: none"> <li>% reduction across portfolio</li> </ul>	<ul style="list-style-type: none"> <li>RPS to collate for reporting baseline</li> </ul>
		<ul style="list-style-type: none"> <li>Aim for solely owned common parts normalised data to not exceed 100kgCO<sub>2e</sub>/m<sup>2</sup></li> </ul>	<ul style="list-style-type: none"> <li>Carbon per m<sup>2</sup> not to exceed target</li> </ul>	
		<ul style="list-style-type: none"> <li>When renewing energy contracts throughout the portfolio purchase 'green tariff' electricity when costs are within 5% of brown energy.</li> </ul>	<ul style="list-style-type: none"> <li>% new contracts placed on green energy tariffs</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:                             <ul style="list-style-type: none"> <li>Aim for 100% use in Carnaby, Seven Dials and Longmartin</li> <li>Replace halogen spot lights with long life bulbs in Chinatown. Aim for 90%.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>% of long life bulbs within portfolio</li> </ul>	Managing agents



Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
H2	<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 Soho portfolio.</li> </ul>	Number of water meters installed	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> <li>Aim to reduce water consumption by 5% from base year of 2012.</li> <li>Aim for usage at maximum of 0.5m<sup>3</sup>/m<sup>2</sup></li> </ul>	<ul style="list-style-type: none"> <li>% of meter readings</li> <li>% reduction</li> <li>Water use does not exceed 0.5m<sup>3</sup>/m<sup>2</sup></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 – maintain constant usage</li> </ul>	Water use does not exceed 2011-12 usage	MJ Mapp

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
H3	<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 to identify residential recycling point within Chinatown.</li> </ul>		Shaftesbury/MJ Mapp
		<ul style="list-style-type: none"> <li>Divert from landfill minimum of 90% of tenant generated waste from Carnaby and Seven Dials and Longmartin</li> </ul>	% of tenants' waste diverted from landfill	Shaftesbury/Capita/EA Shaw
		<ul style="list-style-type: none"> <li>Recycle a minimum of 30% tenants waste at Carnaby and Seven Dials</li> </ul>	% of waste recycled	EA Shaw
		<ul style="list-style-type: none"> <li>Recycle a minimum of 10% tenants waste at St Martin's Courtyard and divert minimum of 90% of remainder from landfill.</li> </ul>	% of waste recycled	Capita
		<ul style="list-style-type: none"> <li>Undertake feasibility study for compostable waste disposal facility at St Martin's Courtyard..</li> </ul>		Shaftesbury/Capita
		<ul style="list-style-type: none"> <li>Research feasibility of communal recycling point in Opera Quarter.</li> </ul>		Shaftesbury/Capita
		<ul style="list-style-type: none"> <li>Continue to monitor volume of paper sent for recycling from Head Office.</li> </ul>	Tonnes paper recycled	Shaftesbury/RPS
		<ul style="list-style-type: none"> <li>Continue to monitor volume of paper purchased for use in Head Office</li> </ul>	% recycled paper purchased	Shaftesbury/RPS

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>H4</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 2012 -13.</li> <li>Maintain documented audit trail of contractors that have received leaflet.</li> </ul>	Number of Induction Leaflets issued	<ul style="list-style-type: none"> <li>Shaftesbury</li> <li>Managing agents</li> <li>Managing agents to keep records</li> <li>RPS to audit</li> </ul>
<b>H5</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> <li>Retain copies of waste transfer notes and record volume of hazardous waste disposed to landfill</li> </ul>	Asbestos register updated	<ul style="list-style-type: none"> <li>Managing agents to maintain asbestos register</li> <li>Managing agents to collate hazardous waste data</li> <li>RPS to audit</li> </ul>

## 3.0 Employees

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

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>I1</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 staff appraisal.</li> </ul>	% of staff receiving appraisal	Shaftesbury
		<ul style="list-style-type: none"> <li>Continue to provide CR awareness training to all staff and key suppliers with annual awareness training.</li> </ul>	List of attendees	Shaftesbury/RPS
		<ul style="list-style-type: none"> <li>Monitor and report on total training spend per employee</li> </ul>		Shaftesbury

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

Number	Objectives	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>J1</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> </ul>		<ul style="list-style-type: none"> <li>• Project Managers</li> <li>• RPS to audit</li> </ul>
		<ul style="list-style-type: none"> <li>• Achieve zero reportable accident/incidents throughout 100% of the portfolio.</li> </ul>	Number of prohibition/enforcement notices received	Project managers
		<ul style="list-style-type: none"> <li>• Record absenteeism within Shaftesbury Head Office.</li> </ul>	Number of days absent/employee	Shaftesbury
		<ul style="list-style-type: none"> <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> </ul>	% of Schemes with satisfactory scores above 26/40	Project Managers
		<ul style="list-style-type: none"> <li>• Ensure 100% of eligible sites have at least one external audit by CCS (includes health &amp; safety criteria).</li> </ul>	% of eligible schemes subject to CCS audit	Project Managers

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

Number	Objective	Targets 2012-13	Key Performance Indicator	Personnel Responsible
<b>K1</b>	<b>Monitor the effectiveness of the equal opportunities policy and comply with all the key employment legislation such as: Sex Discrimination Act, Race Relations Act, Disability Discrimination Act, Human Rights Act, Employment Equality (Age) Regulations and the Protection from Harassment Act.</b>	<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>	% of women in board/senior/management positions	Shaftesbury
		<ul style="list-style-type: none"> <li>Monitor staff turnover.</li> </ul>	% of leavers as part of total staff number per year	Shaftesbury
		<ul style="list-style-type: none"> <li>Monitor average length of service</li> </ul>	Number of years of service per employee	Shaftesbury
<b>L1</b>	<b>Provide opportunities for flexible working</b>	<ul style="list-style-type: none"> <li>Record number of staff with flexible working/part time arrangements.</li> </ul>	% of staff	Shaftesbury





Shaftesbury PLC

RPS Group plc  
20 Milton Park  
Abingdon  
Oxfordshire  
OX14 4SH

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