



Occupational Health, Safety and Wellbeing Policy for Heathrow Airport Holdings Limited

Date policy last reviewed and updated:	February 2025
Last approved by Executive Committee on:	11 February 2025
Last approved by The Sustainability and Operational Risk Committee	18 February 2025
Last approved by the Board of Heathrow Airport Holdings Limited:	20 February 2025
Executive Director accountable for this Policy:	Chief People Officer
Function Policy Lead:	Amanda Owen, Health, Safety and Wellbeing Director
Authors:	Sara Jewell, Fire, Health and Safety Systems and Standards Manager
Version number:	5

1. Purpose

This Policy outlines Heathrow's commitment to ensuring the Occupational Health, Safety and Wellbeing of all colleagues (as defined below) and others who may be affected by Heathrow's activities.

It aims to ensure we fulfil our legal obligations, comply with relevant regulatory and ISO requirements, as well as delivering our vision of being an 'extraordinary airport, fit for the future', built on a strong foundation of Safety, Security and Compliance, living by our value of keeping everyone safe and well every day.

This policy also outlines our commitment to ensuring a robust safety framework is in place (Safe and Healthy Work, Teams, Decisions and Place) by highlighting the expectation that all work will be carried out in a safe manner, through enabling our colleagues (and others) to make safe informed decisions and through the provision of a safe and healthy working environment.

2. Scope

This policy applies to the management and operation of Heathrow Airport Holdings Limited and its subsidiary companies ("**Heathrow**" or the "**Heathrow Group**"). This includes all those who work for and on behalf of Heathrow including directors and colleagues on permanent, temporary, or fixed-term contracts of employment ("**Colleagues**"), and also all paid or voluntary agents, contractors, subcontractors, or contingent workers where appropriate whilst they are undertaking activities for Heathrow and at Heathrow Airport (the "**Third Parties**").

This Policy specifically relates to Occupational Health, Safety and Wellbeing and excludes Aerodrome Safety which is managed through the Aerodrome Manual. All references to 'Health, Safety and Wellbeing' should be taken to mean 'occupational' health safety and wellbeing as defined in section 12.

3. Policy Statement

Heathrow values the health, safety and wellbeing of colleagues, passengers, and anyone else affected by the airport's activities, above all else. Our focus on health, safety and wellbeing is not just the right thing to do, it is the foundation of an efficient operation, a secure airport, and a sustainable business.

The Executive Team share a commitment to provide safe and healthy working conditions for the prevention of work-related injury, ill health and the promotion of colleague wellbeing. We are all responsible for setting the highest fire, health, safety and wellbeing standards and for showing strong leadership in keeping others safe from harm.

At Heathrow, we care for each other. If we see something that could injure someone, we take action to make it safe and then report it as a close call. If we are asked to do something that could harm ourselves or others, we will stop and report it to our manager or supervisor. Action will then be taken to ensure that the activity can be either be done safely, or not at all. We aim to inspire, encourage and support colleague wellbeing, because we believe that a healthy team is the foundation of our success. By promoting a culture of care, we create an environment where everyone can thrive.

If we all notice and care- by reporting incidents, work-related ill health, and close calls, and share what we know about working safely, we will understand how we are doing today and make things better for tomorrow through continual improvement of our safety management system.

4. Arrangements to deliver this policy

Heathrow will deliver this policy by:

- a) Consulting with our colleagues, recognised trade unions, our business partners, and our supply chain so everyone understands how to keep themselves and others safe and healthy.
- b) Committing to fulfil legal and other requirements, understanding our risks and acting to prevent accidents, work-related ill health, and fire-related incidents.
- c) Prioritising and effectively eliminating hazards and reducing health, safety and wellbeing risks, through the application of the hierarchy of controls.
- d) Setting health, safety and wellbeing objectives and targets through our Governance Framework to achieve continual improvement to FHSW performance.
- e) Investing adequate resources, including time, money, and people, to ensure we meet our health, safety and wellbeing objectives.
- f) Ensuring a culture of openness where colleagues can raise concerns and know they will be listened to, and can be confident they can report concerns without repercussion.
- g) Providing Colleagues and Third Parties, as appropriate, with the right information, instructions, training, tools, and equipment to work safely always.
- h) Integrating health, safety and wellbeing considerations into every business decision and by setting and reviewing objectives.

To enable these arrangements, Heathrow will:

- Implement an effective safety management system (SMS) supported by a framework of Health, Safety and Wellbeing Standards defining Heathrow's expectations to effectively manage and control risks across Heathrow (see Appendix 1); and
- Monitor and review FHSW performance, conduct regular assurance of the arrangements in place to manage fire, health, safety and wellbeing risks, and promote a culture of continual improvement.

5. Colleagues and Third Parties Accountabilities and Responsibilities

To implement the Health and Safety Policy, and associated FHSW Standards, Heathrow will establish clear lines of accountability and responsibility at both functional and organisational levels. Ultimately, effective FHSW management at Heathrow Airport can only be achieved through co-operative effort at all levels and across all Colleagues and Third Parties.

Colleagues

All Colleagues and Third Parties have a part to play in ensuring that Heathrow is a healthy and safe place to work. Colleagues and Third Parties have a responsibility for their own health, safety and wellbeing and that of others whose health, safety or wellbeing could be affected by their actions. Colleagues (and Third Parties, where appropriate) will discharge their responsibilities by:

- Promoting and complying with the Health and Safety Policy, and leading by personal example
- Being responsible for their own personal safety, health and wellbeing, and for the safety, health and wellbeing of those they work with or might impact through their work activities
- Identifying and reporting hazards
- Attending appropriate FHSW training required for their roles, including compulsory training, as necessary
- Always following instructions, safe systems of work and procedures
- Keeping their workplace tidy and safe, and not misusing anything provided in the interests of FHSW
- Never putting themselves or others at risk

- Challenging any unsafe acts and conditions, and any practices which could give rise to unsafe or unhealthy situations
- Co-operating with management on FHSW matters, including the investigation of any incident
- Using local arrangements within their function to report all incidents that have caused or could have caused harm (a close call) to the health, safety or wellbeing of themselves or others
- Sharing good practice and safety information, and to support continual improvement.

All Colleagues are encouraged to take an active part in constantly improving FHSW standards, whether through formal or informal consultation arrangements.

Managers

All Managers are additionally responsible for the health, safety and wellbeing at work of those under their control and others who might be affected. Managers will enable their teams, and those working within their control, to go home safe and well by:

- Identifying, understanding, and controlling the FHSW risks in their area of responsibility
- Making Colleagues / new starters aware of the FHSW arrangements, processes and procedures which apply to their function
- Involving Colleagues and recognised Trade Union Safety Representatives in risk assessments and ensuring risk assessments are provided to all Colleagues and are easily accessible
- Ensuring policies and other supporting FHSW standards, instructions, procedures, or controls, are understood and followed by those under their control
- Ensuring Colleagues under their control have received the information and training to carry out their tasks safely
- Providing adequate supervision to colleagues and assuring themselves that FHSW risks within their area of responsibility are being controlled in accordance with the required policies and standards
- Ensuring all incidents that have, or could have, caused harm are reported and investigated so that root causes are identified, and lessons are shared to prevent the incident happening again.

Executive Directors and business function areas

Executive Directors are accountable to the Board of Heathrow through the Executive Committee (“**EC**”) and the EC’s Airport Safety Committee (the “**ASC**”) (see below) for the health, safety and wellbeing performance within their respective functions. They may delegate their responsibility to their direct reports, Business Unit Directors.

The Chief People Officer is the Accountable Executive Director for the H&S Policy and chairs the ASC.

Executive Directors will enable their Managers and Colleagues to discharge their accountabilities by:

- Leading by example, demonstrating Heathrow’s safety behaviours, and ensuring that colleague health, safety and wellbeing is never compromised in pursuit of performance or delivery of operational key performance indicators.
- Ensuring compliance with this policy, and associated standards, in their respective functions.
- Establishing governance mechanisms that provide effective oversight of FHSW performance, and that provide accurate indicators to the Board and other interested stakeholders.
- Ensuring FHSW is always considered at the planning stage when making any changes that may affect the health, safety, or wellbeing of colleagues.
- Ensuring effective consultation occurs between colleagues, recognised Trade Union Safety Representatives and their management teams on FHSW issues.
- Ensuring all cases of personal injury or work-related ill health are reported using the recognised company-approved processes and procedures.
- Ensuring all incidents that could adversely affect the health, safety or wellbeing of colleagues, or others in their areas of responsibility, are reported and thoroughly investigated.

6. Organisational Accountabilities and Responsibilities

Business Functions

Each function is responsible for detailed planning and implementation of FHSW arrangements within their business areas as well as establishing processes and procedures for dealing with the FHSW risks encountered within their sphere of activities, aligned to the FHSW Standards and Guidance. Each function is additionally responsible for regularly reviewing and keeping such processes and procedures up to date. Each function has a governance structure in place, enabling the review of performance against the fire, health, safety and wellbeing objectives, risks, and concerns. Any issues are escalated to the Airport Safety Committee as required. Where Trade Unions are recognised, governance forums are in place to allow for engagement and consultation in matters of fire, health, safety and wellbeing. (See appendix 2)

The Airport Safety Committee

The Airport Safety Committee (ASC) is a sub-committee of the EC and will advise and assist the Executive in reviewing Heathrow's responsibilities, strategies, policies, conduct, performance, and risk management approach in respect of health safety and wellbeing. The ASC is responsible for providing direction and oversight of FHSW risks, control adequacy, culture and performance, and the delivery of FHSW priorities, plans and targets. The ASC holds Executive Directors to account for health, safety and wellbeing performance, and enables risks, issues, decisions, and requests for investment to be escalated to the EC. The specific activities undertaken by the ASC are set out in the ASC's Terms of Reference.

The Executive Committee

The Board has delegated authority to the CEO and through the CEO to the Executive Committee (EC) to conduct the safe day-to-day running of Heathrow Airport. The EC is informed by discussion, decisions, reporting and escalation from the ASC and discharges its accountabilities by:

- Reviewing the health and safety policy and significant proposals before they are presented to the Board.
- Making decisions that ensure the safe operation of Heathrow Airport, and the health, safety and wellbeing of Colleagues, passengers and any other persons who may be affected by their decisions including oversight of health, safety and wellbeing performance.
- Ensuring suitable and sufficient health, safety and wellbeing resources are available for providing advice and direction to the Heathrow Group.

The Sustainability and Operational Risk Committee

The Board established the SORC to assist in reviewing policies, conduct, performance and risk management against sustainability goals and operational objectives. The SORC is accountable to the Board for:

- Reviewing and challenging the health, safety and wellbeing performance of Heathrow in relation to operational risks and delivery of objectives.
- Monitoring and challenging management over the effectiveness of relevant internal control systems through review of relevant audit or assurance reports
- Reviewing and assessing management's response to significant operational incidents.
- Monitoring and challenging the appropriateness of sustainability and operational risk assurance strategies and plans, the execution and results of such plans and relevant communications.

The SORC provides formal reports to the Board and makes recommendations where action or improvement is required.

The Board

The Board is ultimately accountable for ensuring that its operating companies have systems of internal control that provide assurance of effective and efficient operations and legal compliance, including health, safety and wellbeing. The Board discharges its accountabilities by:

- Demonstrating strong and active leadership from the top, ensuring there is visible, active commitment from the Board and appropriate board-level review of health, safety and wellbeing performance.
- Approving the health and safety policy and ensuring the associated requirements are implemented across the company.
- Considering reports from the SORC and approving recommendations for decisions or actions to improve performance or ensure compliance.
- Ensuring health, safety and wellbeing is fully integrated into the corporate governance structure as a key element of the SORC, which will be chaired by one of the Non-Executive Directors.
- Ensuring the company has sufficient resources to meet its health, safety and wellbeing objectives.
- Reviewing the effectiveness of risk management and internal controls.

7. Reporting health and safety concerns

Colleagues should consult their line manager in the first instance on the FHSW arrangements, standards, risk assessments, processes and procedures which apply to their function.

Colleagues should report close calls, faults, accidents, injuries and ill-health at work in line with Heathrow's reporting procedures.

Heathrow is committed to ensuring that no one suffers any detrimental treatment or repercussions from reporting their concerns around any health, safety or wellbeing breaches. Colleagues who have concerns about any actual or suspected breach of fire, health, safety or wellbeing requirements should raise them either with their Line Manager or a member of the Legal or the FHSW team.

Colleagues can also follow the reporting routes set out in the Whistle-blowing Policy. Concerns will be taken seriously and will be investigated in a confidential manner in accordance with the Internal Investigations Protocol.

8. Consequences of non-compliance with this policy

Non-compliance with this policy is likely to result in the health, safety or wellbeing of colleagues, passengers, Third Parties, and others being adversely affected by our activities or actions. Such occurrences could cause immediate harm or long-term ill health to the identified groups and could result in criminal or civil proceedings, financial loss or damage to Heathrow's reputation.

Additionally, breaches of this policy, or associated standards, procedures or instructions may result in formal investigation, in line with the Disciplinary Policy for Heathrow Airport Ltd.

9. Communication of this policy

This policy must be communicated to:

- All Board and Executive Directors
- All Colleagues, and colleagues directly contracted to HAL
- Recognised Trade Union Chairs and Safety Representatives
- All Third Parties associated with Heathrow (including paid or voluntary agents, consultants, contractors, suppliers, and their employees)

This policy will be made available via the following means:

- The Health, Safety and Wellbeing Policy Statement will be displayed in prominent locations in all HAL Buildings and Terminals and be accessible to everyone externally on HAL's website
- The Health, Safety and Wellbeing Policy and Policy Statement will be accessible in the company policy database, and safety management system.
- The Health, Safety and Wellbeing Policy will be available to third parties through 'Employers Requirements' stored in documentum.

10. Related documents

This Policy must be read in conjunction with the following:

- Fire, Health, Safety and Wellbeing Standards and Guidance
- Managing Fire Safety at Heathrow
- Heathrow's FHS governance arrangements (see Appendix 2)
- Functional FHSW arrangements, guidance, risk assessments, processes, and procedures
- Heathrow's Disciplinary Policy
- Heathrow's Whistleblowing Policy

11. Management review of this policy

This policy will be reviewed yearly by the Health, Safety and Wellbeing Director, the Executive Committee, SORC and the Board.

The Health, Safety and Wellbeing Policy Statement will be reviewed yearly by the Health, Safety and Wellbeing Director and signed by the Chief Executive Officer (CEO).

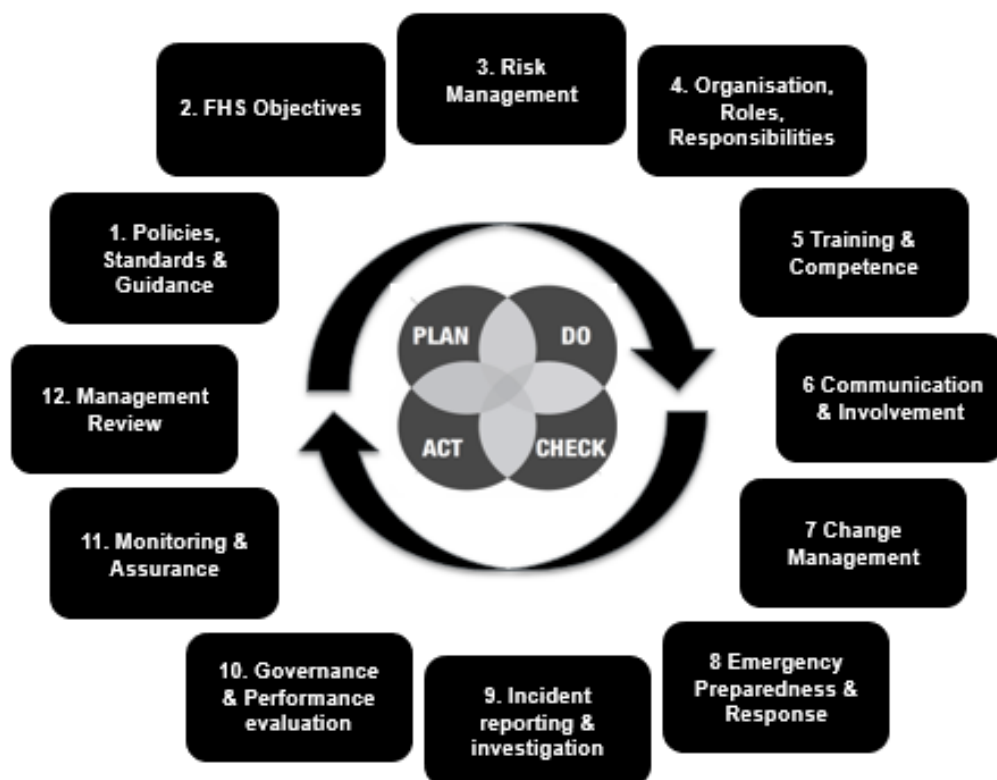
12. Definitions

Wellbeing – The combination of **individual and organisational factors** that enable colleagues to thrive at work

Occupational Health and Safety*– the practice of preventing work-related injuries and ill-health to colleagues and providing safe and healthy workplaces

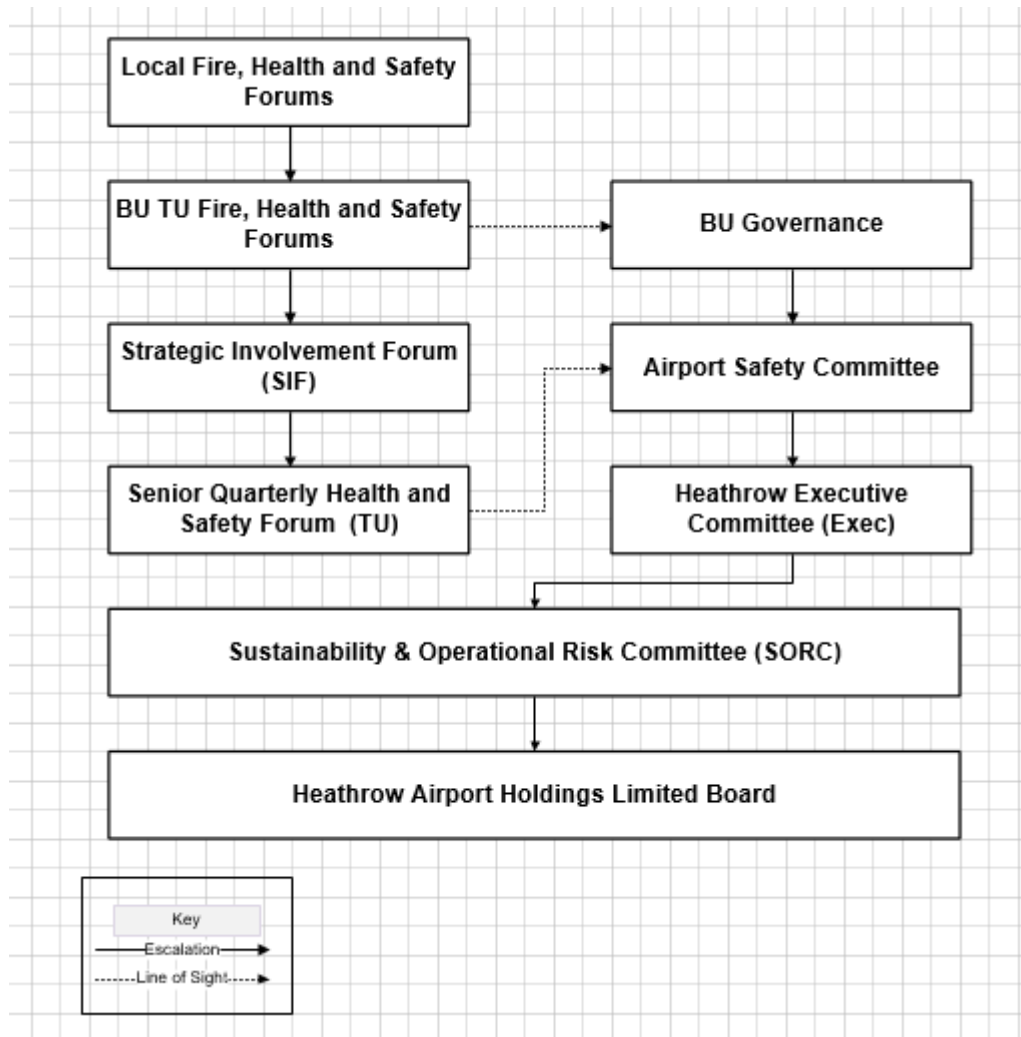
**as distinct from Aerodrome Safety*

Appendix 1

Heathrow**Safety Management System Elements***

**Aligned to ISO45001 and the Plan Do Check Act approach in INDG417 & HSG65*

Appendix 2

Heathrow**Governance – Health & Safety**

The Occupational Health, Safety and Wellbeing Policy for Heathrow Airport Holdings Limited

Version Control

Change History	
Policy Lead	Amanda Owen - Health, Safety and Wellbeing Director
Changes made by	Sara Jewell- FHS Systems and Standards Manager & Szczepan Lemanczyk- Head of Health and Safety
V4 Oct 2023 (Published Feb 2024)	- Sections are now numbered. 5. Changed to 'Accountabilities and Responsibilities' to flow with the section 6 5. Business functions – added in governance requirements 5. Addition of CPO as 'accountable exec director' - Removed 'arrangements' section as an arrangement section already in place– included the content in section 10, 'related documents. 6. SORC responsibilities aligned to the TOR 9. Addition of communication through 'Employers Requirements' stored in documentum. 11. Review cycle updated – to include yearly review of the policy statement. - Appendix 1 updated to reflect the new SMS elements outlined in the SMS Standard
Policy Lead	Amanda Owen – Health, Safety and Wellbeing Director
Changes made by	Sara Jewell – FHS Systems and Standards Manager
V5 Feb 2025	- Change of Name to Occupational Health, Safety and Wellbeing Policy on Executive Teams' endorsement. - Purpose altered to align with new Strategy wording - Addition to the Scope to distinguish between Occupational and Aerodrome Safety. - Change of terminology from 'health and safety' to 'health, safety and wellbeing' to fit the context of the content and highlight a focus on wellbeing. Effecting S1, 3, 4, 5, 6, 7, 10 - Section 3: inclusion of specific wellbeing section 'we aim to inspire... and promote wellbeing' - Previously 'FHS Safety Management system', now 'Safety management System' throughout for consistency with other documentation. - S 4.f. inclusion of 'report concerns without repercussions' also added to S7. - Addition of Section 12 – Definitions, Wellbeing and Occupational Health and Safety. Appendix 3 removed now new CPO in place.