

**GEZE UK Ltd**

# **Environmental Policy & Arrangements**

**1<sup>st</sup> July 2010**

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## **Section 1 - The Policy**

The Directors and management of GEZE UK Ltd recognise that the business activities of the company can have an impact on the local, regional and global environment.

It is our aim to reduce these environmental impacts and to operate in an environmentally responsible manner.

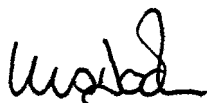
This policy therefore describes how we intend to achieve this aim.

In carrying out this environmental policy, we will strive to achieve, and will also encourage others to achieve, the following objectives:

1. To operate an environmental management system (EMS) throughout the company.
2. To take an integrated view of the environment and to adopt a long-term perspective, both concerning the well-being of the environment itself and the effects of human actions upon it.
3. To meet, and where appropriate exceed, all relevant environmental legislative and regulatory requirements together with requirements imposed by customers and other relevant parties.
4. To review and monitor all our business activities and operations in order to identify, understand and evaluate their direct and indirect environmental aspects and effects, and prioritise actions to address these issues.
5. To support continuous environmental improvement by establishing demanding, achievable and measurable environmental performance targets that will be reviewed and reported on an annual basis.
6. To reduce energy and resource consumption by utilising effective and efficient working methods, processes and practices consistent with best practice.
7. To implement a systematic waste minimisation programme in order to achieve objectives and targets for reducing waste, avoiding the use of terminal waste treatment and dealing with it, as far as possible, at source.
8. To minimise the environmental effects of the handling, transportation and subsequent treatment of any residual waste generated by the company.
9. To avoid the use of toxic materials in business operations, services and products.

10. To prevent, minimise or render harmless releases of pollutants arising from business operations and services.
11. To prevent community impacts associated with noise or vibration from our business activities.
12. To encourage modes of transport, which minimise environmental impact, ensure that our employees are aware of efficient driving and examine the operation of our vehicles.
13. To maintain effective communication systems on environmental matters to ensure that our employees are aware of relevant environmental issues, and of their own roles and responsibilities in delivering the overall programme and providing training for those with particular responsibilities.
14. To integrate environmental management into training programmes and job descriptions for all employees.
15. To keep abreast of relevant technical and legislative developments in order to continue operating in accordance with current best practice.
16. To promote the company's objectives and to respond positively to enquiries and suggestions from both inside and outside the company.
17. To select and work with corporate partners, suppliers and contractors to improve their environmental performance towards achieving compliance with this policy.
18. To ensure that key suppliers and contractors are aware of our policy and as far as practicable to ensure that goods and services procured support the environmental policy and that wherever possible, they operate to similar standards.
19. To regularly monitor, audit and review our environmental programme to ensure continuous improvement, and identify examples of best practice that may be shared throughout the company.
20. To carry out regular reviews of management practices to verify their validity and effectiveness in achieving the company's environmental objectives.
21. To collate and publish relevant information about our environmental performance on an annual basis.

**Signed:**



**Date:**

1<sup>st</sup> July 2010

Mr. M. J. Bodley

## **Scope**

This policy document applies to the following sites, premises, business and activities together with all environmental aspects that are under the control of the company:

GEZE UK Manufacturing  
GEZE UK Distribution  
GEZE UK Contracting & Service

## **Resources**

The company will endeavour to provide all necessary resources and training to achieve the aims and objectives contained within this policy.

## **Targets**

The company has agreed upon and has set the following targets for implementing the policy and reducing environmental impacts related to our business activities:

Reduce Carbon Footprint  
Minimise generation of Waste  
Maximise Recycling

Performance against these targets will be regularly monitored and the targets will be subject to regular review

Reports on target performance levels and achievements will be regularly reported and published.

## **Responsibilities**

The company has assigned overall responsibility for the implementation of this policy to Mr. M. Bodley - Company Secretary

However it is stressed that all managers and employees have responsibility in their areas to ensure that the aims and objectives of the policy are met.

### **Monitoring, Auditing & Review**

The policy and supporting management systems will be subject to regular review, updated when necessary and at least every 12 months from the date of release of the policy. Any revisions will be brought to the attention of all employees and others who may be affected.

The Environmental Management Committee will generally advise on implementation of the policy and monitor progress.

The Environmental Management Committee will also co-ordinate and promote an improvement programme to implement the policy, prepare regular reports on progress to senior management and publicise developments.

The Senior Management Team will annually review the effectiveness of the environmental management system and identify any required changes.

### **Communication**

This policy will be communicated to all our employees and other interested parties together with any revisions or changes.

It will also be made available on request and published on the company web site and intranet system.

The company will also include a section on environmental issues within its annual reports.

## **SECTION 2 – Company Organisation**

All persons within the Company must be aware of the lines of communication and levels of responsibility that exist to ensure that environmental matters are dealt with effectively and efficiently.

The management responsibilities outlined relate specifically to environmental issues and not necessarily to other management functions.

## **Responsibilities of the Managing Director**

In order to ensure that environmental issues are effectively managed within the company the Managing Director shall:

- (1) Be responsible for ensuring the establishment of an effective Environmental Policy within the company and for publicly supporting all persons carrying out the policy and its objectives.
- (2) Ensure the periodic review and appraisal of the effectiveness of the policy and the company's environmental performance, and ensure that any required changes are made.
- (3) Ensure that a strategy plan is prepared for the continual management of environmental matters as part of the business objectives of the company, including a system for the regular monitoring, review and development of the plan.
- (4) Ensure the appointment of suitable and adequate `competent persons`, and make available the necessary finance, materials and other assistance to enable the effective carrying out of the associated functions and requirements.
- (5) With the assistance of the competent person/s, measure, appraise and where necessary, correct the company's environmental performance and seek to achieve continual improvement in environmental performance.
- (6) Ensure that the Environmental Policy for the company and the programme of implementation is understood at all levels through the commitment of adequate training resources to that programme.
- (7) Ensure that responsibility for environmental management is properly assigned and accepted at all levels and that these areas of responsibility are periodically reviewed.
- (8) Ensure that suitable and adequate assessments of environmental impacts and legislative compliance are carried out in accordance with the requirements of the management system.
- (9) Ensure that systems are in place to provide adequate levels of environmental control and organisation on all sites.
- (10) Personally undertake environmental training and attend environmental performance review meetings or arrange for a senior manager to act on his/her behalf.

## **Responsibilities of Directors**

In order to ensure that environmental issues are effectively managed within the company the Directors and Partners shall:

- (1) Ensure the establishment of an effective Environmental Policy within the company and publicly support all persons carrying out the policy and its objectives.
- (2) Ensure the periodic review and appraisal of the effectiveness of the policy and the company's environmental performance, and ensure that any necessary changes are made.
- (3) Ensure that a strategy plan is prepared for the continual management of environmental as part of the business objectives of the company, including a system for the regular monitoring, review and development of the plan.
- (4) Ensure the appointment of suitable and adequate `competent persons`, and make available the necessary finance, materials and other assistance to enable the effective carrying out of the associated functions and requirements.
- (5) With the assistance of the competent person/s, measure, appraise and where necessary, correct the company's environmental performance and seek to achieve continual improvement in environmental performance.
- (6) Ensure that the Environmental Policy for the company and the programme of implementation is understood at all levels through the commitment of adequate training resources to that programme.
- (7) Ensure that responsibility for environmental management is properly assigned and accepted at all levels and that these areas of responsibility are periodically reviewed.
- (8) Ensure that suitable and adequate assessments of environmental impacts and legislative compliance are carried out in accordance with the requirements of the management system.
- (9) Ensure that systems are in place to provide adequate levels of environmental control and organisation on all sites.
- (10) Attend environmental performance review meetings or arrange for a senior manager to act on his/her behalf.
- (11) Personally undertake environmental training and, where necessary, periodically review and update his/her level of awareness of environmental issues.

## **Responsibilities of Managers and Supervisors**

The Managers and Supervisors within the company shall:

- (1) Familiarise themselves with the Environmental Policy of the company and their responsibilities under the relevant environmental legislation.
- (2) In conjunction with the Environmental Manager/s, identify all risks to the environment within their department or section and take suitable and adequate measures to eliminate, reduce or control those risks.
- (3) Ensure that employees and other persons within their department or section are provided with suitable and adequate information, instruction and training for the tasks they are required to perform.
- (4) Ensure that all employees in their department or section are fully aware of the procedures in the case of fire or other emergency or incident.
- (5) Ensure that practices and procedures in their department or section are maintained and continually developed to minimise environmental impacts.
- (6) Ensure that adequate supervision is provided or available at all times.
- (7) Carry out the investigation of all incidents promptly, to discover the causes and take immediate action to eliminate a recurrence.
- (8) Ensure that any operations, plant or equipment likely to cause environmental effects are operated correctly, properly adjusted and maintained and that any control devices/equipment are always used.
- (9) Ensure that all defects in their department or section are promptly recorded and rectified. Where the defect involves the environmental performance of machinery or equipment, ensure that it is immobilised until repaired.
- (10) Ensure that any relevant targets set by the company are made known to employees and that achievements of targets are identified.

## **Responsibilities of Employees**

In order to ensure that environmental management within the company is effectively implemented and carried out all employees shall:

- (1) Familiarise themselves with and conform to the Environmental Policy for the company.
- (2) Conform to all relevant company rules and regulations made in the interest of environmental management.
- (3) Not misuse any equipment issued in the interest of environmental protection, health, safety or welfare.
- (4) Ensure that incidents are reported promptly and fully to the appropriate person, manager or supervisor.
- (5) Comply with any instructions issued by their manager or supervisor.
- (6) Comply with any instruction issued by a Principle Contractor or his representative at construction sites.
- (7) Undertake training provided regarding environmental issues, the environmental management systems and their roles and responsibilities.

## **Responsibilities of Contractors**

In order to ensure that environmental management within the company is effectively implemented and carried out all contractors and their employees shall:

- (1) Comply with the Environmental Policy for the company and any relevant rules and procedures.
- (2) Comply with all relevant legal requirements, codes of practice and guidance relating to their operations and work activities.
- (3) Ensure that their own company's environmental policy and relevant working procedures are made available before any work commences and during the period of the work.
- (4) Ensure that any plant or equipment brought onto the company's premises is in a operated correctly, in a satisfactory condition and is properly maintained in accordance with the manufacturers instructions and any relevant regulations or codes of practice.
- (5) Ensure that they do not alter or misuse anything provided for their use or interfere with any plant or equipment on the site, unless authorised by the company.
- (6) Provide information and assessments of noise levels and other environmental risks arising from plant, equipment or operations brought onto the company's premises or site.
- (7) Report to the company reception or site office upon arrival and leaving.
- (8) Report immediately any incidents causing or potentially causing any environmental damage or potentially having an environmental impact

## **SECTION 3 – General Arrangements**

### **Introduction**

This section defines the standards, rules and procedures of the environment management system and areas of risk that apply to the company's work activities, products and services.

It is the responsibility of all employees to observe these rules and procedures and to conduct themselves properly and to carry out their work in a safe and reasonable manner.

Failure to comply with the following arrangements could render employees liable to disciplinary procedure or criminal prosecution.

The company recognises that it is not possible to prepare in written form every rule that applies to the work activities and to employees as circumstances may vary depending upon the nature of work.

The detailed arrangements for controlling environmental incidents, specific procedures and information may also be set down in an environmental manual.

Each department may also be required to develop procedures in relation to the specific work activities and tasks that are carried out.

All tasks will require the persons in control to apply `planning` and `monitoring` to the activities.

- **Planning**

Prior to commencement of work, the person in control of any task, must determine which of these arrangements apply, and ensure that the appropriate materials, equipment and procedures are available to enable them to be implemented.

- **Monitoring**

It is essential that the persons in control of any task ensure that the standards are maintained throughout the life of that task, therefore requiring standards to be monitored on a continual day to day basis.

It should also be noted that any statutory references and guidance information referred to in the arrangements is not to be considered as an exhaustive list but merely a guide. Additional requirements may apply depending on local circumstances and conditions.

## **Environmental Risk Management**

The company recognises that it has a responsibility to prevent, minimise or control the environmental consequences of its business and acknowledges that this includes ensuring that all significant effects or impacts arising from work activities, products and services are adequately managed.

In particular the following rules and procedures will be applied in relation to this area or relevant work activities:

- The company will institute a programme of environmental impact identification and an assessment of the environmental significance of all its activities in order to eliminate, reduce or control, so far as is reasonably practicable, any environmental harm or danger.
- All assessments will be fully documented and recorded.
- All assessments will be reviewed annually.
- All assessments will be monitored on a regular basis at a frequency determined by, and stated within, the assessment.
- All relevant employees or other persons will be informed of the findings of assessments that relate to their work activities or otherwise affect them.

### **Definitions**

Environmental Aspect - "Element of an organisation's activities, products or services that can interact with the environment".

Environmental Impact - "Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services".

Significant Environmental Aspect - "An environmental aspect which can have a significant environmental impact".

### **Hierarchy of control measures**

The following principles will be applied to adopting control measures:

- Avoiding the impact altogether.
- Evaluating the aspects/impacts which cannot be avoided.
- Combating impacts at source.
- Reducing the potential for harm by replacing the harmful with harmless or less harmful.
- Modifying process to reduce potential far impact.
- Providing controls to eliminate, minimise or reduce potential for impact.
- Adapting to technical progress.

- Developing a coherent overall prevention/reduction policy.
- Giving appropriate instructions to employees.

## **Review and Revision**

All assessments must be kept up-to-date and be reviewed and modified, where necessary. If changes take place which mean that the current risk assessment is no longer valid or that it can be improved, the assessment must be reviewed. In all cases, risk assessments will be reviewed on a regular annual basis.

## **Record keeping**

All significant findings of assessments and subsequent monitoring must be recorded. The records must include:

- The environmental aspects identified.
- The environmental impacts associated with each aspect.
- The levels of risk associated with the hazards.
- The existing or required control measures.
- The potential receivers that may be affected by the impacts and any receivers at special risk.
- Decisions taken as a result of the assessment.

## **Information and training**

All employees will be provided with relevant information regarding the significant environmental aspects identified by the assessment, including information on the required control measures. Any additional training necessary in the operation of the process, use of control equipment, which may be introduced as a result of the assessment, must also be provided.

Employees involved in conducting assessments will be given appropriate training and any additional information applicable to the particular working environment or activities that they may be assessing.

Appropriate information will also be provided to others regarding the results of assessments and subsequent control methods that may affect them.

## **Energy Use and Carbon Generation**

The company recognises that it has a responsibility to control the effects arising from its use of energy and particularly energy generated from fossil fuels.

We fully appreciate the related potential impacts on the local, regional and global environment and aim to reduce the environmental impacts of our business and to operate in an environmentally responsible manner.

We will therefore endeavour to control any adverse effects on the environment associated with the use by the company of energy and particularly energy generated from fossil fuels and to comply with all relevant legal and other requirements.

### **Objectives**

The company will strive to achieve, and will also encourage others to achieve, the following objectives:

- To reduce energy and resource consumption by utilising effective and efficient working methods, processes and practices consistent with best practice.
- To meet, and where appropriate exceed, all relevant environmental legislative and regulatory requirements and the requirements imposed by customers and other relative parties.
- To encourage modes of transport, which minimise environmental impact, ensure that our staff are aware of efficient driving and examine the operation of our vehicles.

### **General requirements**

The company will:

- Apply the hierarchy of eliminate, minimise, use renewable energy, use lowest carbon emitting source.
- Implement measures to reduce the its carbon footprint.
- Measure, monitor and report energy usage.
- Use carbon accounting as a basis for energy efficiency evaluation.

- Consult with and engage employees and actively encourage a culture of energy saving.
- Review processes, building energy efficiency, lighting, heating, air conditioning, refrigeration systems, transport systems and take cost effective measures to eliminate or reduce/minimise energy usage.
- Operate and maintain all processes, buildings, plant and vehicles, lighting, heating and cooling equipment/systems and any associated control technology to ensure performance meets or exceeds energy efficiency requirements.
- Ensure proper maintenance of processes, plant, equipment and any associated control technology.
- Review process, systems and control provisions in the light of technological developments.
- Consider energy efficiency and carbon saving in decisions about future developments, services or products.
- Obtain energy from renewable sources where practicable.

### **Legal compliance**

The company will endeavour to comply with and where appropriate exceed all relevant legal and other requirements.

The company will routinely review developments in legal provisions to ensure continued compliance.

### **Carbon reduction commitment energy efficiency scheme**

The company recognises its obligations under the Carbon Reduction Commitment Energy Efficiency Scheme Order 2010 and will :

- Make an information disclosure in the specified form to the appropriate enforcing authority.

GEZE UK does not use more than 6,000MWh of electricity through half hourly meters at any site and are therefore not subject to other measures within this Order.

## **Waste Management**

The company recognises that it has a responsibility to control the effects arising from its use of resources within its activities, products and services.

We also appreciate the impact that any waste generated or handled by the company has on the local, regional and global environment.

In order to reduce the environmental impacts of our business and to operate in an environmentally responsible manner we will endeavour to control any adverse effects on the environment associated with its use of resources and any waste generated or handled and to comply with all relevant legal and other requirements.

### **Objectives**

The company will strive to achieve, and will also encourage others to achieve, the following objectives:

- To reduce energy and resource consumption by utilising effective and efficient working methods, processes and practices consistent with best practice.
- To implement a systematic waste minimisation programme to achieve objectives and targets to reduce waste, avoiding the use of terminal waste treatment and dealing with it as far as possible at source.
- To minimise the environmental effects of the handling, transportation and subsequent treatment of any residual waste generated by the company.
- To meet, and where appropriate exceed, all relevant environmental legislative and regulatory requirements and the requirements imposed by customers and other relative parties.

### **General requirements**

The company will implement measures to minimise the natural resources used by the Company and the amount of waste materials arising from its business activities. In particular the company will:

- Regularly and routinely review processes to adopt most efficient use of raw materials including new technologies.
- Use quality management systems to maintain process performance at design levels.

- Source materials from renewable/sustainable sources where possible.
- Recycle/reuse raw materials, product, components etc where practical.
- Implement and operate a transport plan to minimise delivery journeys by road and to use transport as efficiently as possible.
- Train and encourage drivers to use more efficient driving techniques.
- Consider fuel efficiency in decisions to purchase new vehicles and plant.
- Use fuel from renewable sources e.g. bio diesel where possible.
- Design packaging to minimise material usage, to use materials with the lowest environmental impact and to use recycled material or materials from renewable sources where practicable.
- Design packing to be recycled when further reuse is no longer possible.
- Reuse packaging where possible and recycle it when it cannot be further reused.
- Consult with suppliers to review packaging design and content to reduce the environmental consequences of package materials and components.
- Minimise usage of other natural resources including water.
- Have regard to the 'Waste Hierarchy' when considering the effects of the waste it generates and the controls to be applied, namely to prevent, reduce, re-use, recycle, recover and dispose.

The company will ensure that its waste is properly handled to prevent its escape or impact on the environment. In particular the company will:

- Where appropriate keep different categories of waste separate/segregated and suitably labelled/identified.
- Ensure waste is stored under cover where appropriate and is kept secure in suitable covered containers.
- Make sure that waste storage areas are suitably constructed to prevent contamination of land or pollution of water.

- Transport waste using containers/vehicles that prevent spillage or escape of the waste.

### **Legal compliance**

The company will endeavour to comply with and where appropriate exceed all relevant legal and other requirements.

We will routinely review developments in legal provisions to ensure continued compliance.

We will ensure that we obtain all of the relevant registrations, licences, permits or authorisation for its waste storage, handling, transportation and processing.

We will conduct its activities to comply with the conditions applied by any registrations, licences, permits or authorisations.

### **Duty of care**

The company will implement measures comply with the requirements of the duty of care, in particular to:

- Prevent the escape of waste from its business activities.
- Ensure that waste is only transferred to an authorised contractor and provide a written description of the waste, maintaining records for the minimum prescribed period of two years.
- Ensure that all appointed waste contractors are authorised in respect of the different categories of waste.
- Ensure that the site receiving the company's waste is authorised to accept it.

### **Pre-treatment of waste for landfill**

The company will ensure that any non hazardous waste destined for disposal at landfill will be subjected to pre-treatment to:

- Reduce its volume;
- Reduce its hazardous nature;
- Facilitate its handling;
- Enhance recovery.

## **Transportation of waste**

The company will register with the appropriate enforcement agency for the carriage of waste produced by other parties or construction waste and implement systems to ensure that:

- The certificate of registration is returned to the enforcing authority if it is amended or revoked.
- An authority for transporting controlled waste is produced within 7 days when requested to do so by an enforcing authority.

## **Environmental permitting and waste management licensing**

To ensure compliance with the legislation relating to the permitting of installations and waste operations under the integrated pollution prevention control regime the company will:

- Ensure the appropriate permit or licence is obtained prior to the operation of any installations subject to the legislation.
- Apply best available techniques (BAT) to the operation of permitted installations.
- Ensure compliance with all permit/licence conditions.
- Register any exempt waste operation with the exemption registration authority.
- Notify the exemption registration authority of any notifiable waste operations.
- Issue annual renewal notices to the exemption registration authority for the continuation of a notifiable exempted waste operation.
- Carry out notifiable waste operations out to comply with the applicable conditions.

## **WASTE PACKAGING**

In order to meet its objectives regarding waste packaging and to meet the requirements of the Essential Requirements Regulations 2003 the company will:

- Minimise packaging weight and volume, subject to safety, hygiene and consumer acceptance.
- Make sure packaging can be recovered i.e. recycled, have energy recovered from it, or be composted or reused.
- Retain evidence of compliance for at least four years from the date the packaging was first placed on the market.

To meet the requirements of the Producer Responsibility Regulations the Company will:

- Register with the environmental regulator, either directly or through a producer compliance scheme.
- Have in place measures to meet the recovery and recycling obligations as specified in Schedule 2 of the Regulations.
- Pay for the recovery and recycling of certain amounts of packaging waste.
- Maintain records of the information specified in the regulations including the quantities of packaging waste for recovery and reprocessing.
- Retain the records for at least 4 years after the record is made.
- Provide evidence to the environmental regulator, using electronic packaging recovery notes (EPRNs) and packaging export recovery notes (EPERNs).
- Provide a certificate of compliance in respect of the recovery and recycling obligations by 31 January in the year following the relevant year.

Producers must also comply with the conditions of the registration which include requirements to:

- Comply with the producer obligations.
- Inform the appropriate Agency, within 28 days of the occurrence, of any change in the circumstances of the producer or any material change in the information provided regarding the operations and classes of packaging etc.

- Provide records and returns to the appropriate Agency as required by regulation 20.
- Notify the appropriate Agency if the Company wishes to cancel it's registration or become a member of a registered scheme or cease to be a producer in respect of a year.
- Comply with the operational plan submitted as part of the application or, if a revised plan has been submitted, with the most recent version.
- On or before 31st January in a relevant year, provide to the appropriate Agency a revised version of the operational plan.

### **Packaging information to customers**

The Company will provide information to customers about:

- Reusing, recovering and recycling packaging.
- The collection facilities available to them.
- The meaning of related markings on packaging that he places on the market and that relates to his recovery and recycling obligations.
- The chapter dealing with the management of packaging and packaging waste in the national waste strategy

## **FIRE SAFETY / EMERGENCIES**

The company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes ensuring that procedures are developed and followed in respect of fire and other emergencies.

The company will endeavour to control the associated risks and to comply with the legal requirements relating to fire safety and other emergencies, as contained within the Regulatory Reform (Fire Safety Order) 2005 and the Management of Health and Safety at Work Regulations 1999, and with the specific guidance notes issued by the Health and Safety Executive and Fire Authority.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- The company will take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of all employees and other persons that may be affected by its activities.
- Risk assessments will be completed for all premises occupied by the Company for the purpose of identifying the general fire precautions required to be implemented.
- The significant findings of the assessments and details of any groups of persons identified as being especially at risk will be recorded and brought to the attention of relevant employees and other affected persons.
- All relevant risk assessments will be subject to periodic monitoring at a frequency prescribed by the assessment.
- All relevant risk assessments will be subject to periodic review at a frequency prescribed by the assessment or when they are no longer valid or significant changes have occurred.
- Where dangerous substances may be present in or on premises, the risk assessment will take account of any relevant special hazards with a view to eliminating or reducing the risks so far as is reasonably practicable.
- All premises will be equipped with appropriate fire-fighting equipment and with fire detectors and alarms where considered to be necessary, as determined by the risk assessment.
- All non-automatic fire-fighting equipment will be easily accessible, simple to use, and their location will be indicated by signs.

- Suitable and sufficient emergency routes and exits will be designated for all company premises and selected in order for employees and any other persons to evacuate as quickly as possible.
- All emergency routes and exits will lead to a place of safety and will be indicated by signs.
- All emergency exits and the routes to emergency exits from premises must be kept clear at all times.
- All emergency exit doors will open in the direction of escape and allow easy and immediate opening.
- All emergency exit doors must remain unlocked and unfastened at all required times.
- All emergency exits and routes requiring illumination will be provided with suitable emergency lighting.
- All fire alarms will be maintained in efficient working order, good repair, serviced at required intervals and tested at regular intervals, as determined by the risk assessment. A suitable record of such tests will be kept and maintained.
- Fire drills / emergency evacuations will take place at required intervals. A suitable record of such drills shall be kept and maintained.
- All employees will be provided with suitable and sufficient instruction and training on the appropriate precautions and actions required to be taken by them in case of fire or other emergencies. This training will be provided at induction and repeated periodically and/or when required.
- All visitors to company premises, including contractors, will be provided with suitable information and will be required to record their details in a register, including times of arrival and leaving.
- The company will appoint one or more suitable `Competent Persons` for every premises, who will be responsible for ensuring that all preventative and protective measures for fire and other emergencies are in place. All such appointees will be provided with adequate information, training and other resources in order to carry out his/her role and duties effectively.
- The company will appoint a sufficient number of fire marshals at every premises in order to implement and manage the emergency evacuation procedures. Duties of fire marshals will be as detailed below.

- The company will prepare and publish a Fire / Emergency Plan for all company premises as detailed below.

### **Fire / Emergency Plan**

- Any person discovering a fire shall raise the alarm and then notify the fire marshal or appropriate manager / supervisor.
- The fire marshal or manager / supervisor shall ensure that the relevant emergency services are phoned giving the following information:
  - Name of person making call
  - Site address
  - Telephone number
  - Nature of incident (if known)
- The fire marshal shall remove the visitors book / staff register and vacate the premises by the nearest available exit.
- All personnel should vacate the premises calmly and quickly by the nearest available emergency exit and assemble at their nominated point.
- Once at the assembly point employees must report to the fire marshal who will conduct a roll call to establish complete evacuation or any missing persons.

### **Duties of Fire Marshals**

Appointed fire marshals will ensure that:

- All fire exits and fire escapes are kept clear at all times.
- Fire doors are unlocked during working hours or other periods of occupancy.
- Fire-fighting equipment is sited correctly.
- Fire-fighting equipment has been checked and serviced in accordance with requirements.
- Fire-fighting equipment used or found to be defective is reported immediately.
- An up-to-date list of personnel is maintained.

- All personnel are made aware of the fire / emergency plan and the action required in the event of a fire or other emergency.
- Fire drills are carried out at suitable intervals after obtaining authorisation from management.
- Fire and emergency records are maintained.

## **CONSTRUCTION SITE WASTE**

The company when carrying out construction projects will ensure as far as reasonably practicable that it complies with the requirements of the Site Waste Management Plans Regulations 2008, and in particular will:

### **As Client for a project:**

- Appoint a contractor as the principal contractor if there is one or more contractors for any project
- Prepare a site waste management plan as specified by the Regulations before construction work begins.
- Give reasonable directions to any contractor so far as is necessary to enable the principal contractor to comply with these Regulations.
- Review, revise and refine the site waste management plan as necessary.
- Take reasonable steps to ensure that sufficient site security measures are in place.
- Monitor to ensure that any waste arising on site is managed within the terms of the site waste management plan and in checking the effectiveness of such measures.

### **As Principal Contractor:**

- Update the site waste management plan in accordance with this regulation.
- Ensure that the site waste management plan is kept at the site office, if there is one;
- Ensure that every contractor knows where the plan is kept and that the plan is made available to any contractor carrying out work described in the plan.
- Keep the site waste management plan for two years after the completion of the project at the Principal Contractor's principal place of business or at the site of the project.
- So far as is reasonably practicable, ensure co-ordination of the work and co-operation among contractors at work during the construction phase.

- So far as is reasonably practicable, ensure that every worker carrying out the construction work is provided with:
  - (a) Suitable site induction; and
  - (b) Any further information and training needed for the particular work to be carried out within the terms of the site waste management plan.
- That waste produced during construction is re-used, recycled or recovered.
- Make and maintain arrangements that will enable the principal contractor and the workers engaged in the construction work to co-operate effectively in promoting and developing measures to ensure that any waste arising on site is managed within the terms of the site waste management plan and in checking the effectiveness of such measures.
- Monitor performance of the project against the requirements of the plan.
- Review, revise and refine the site waste management plan as necessary and as required by the Regulations.
- Take reasonable steps to ensure that sufficient site security measures are in place.

## **CHEMICALS & SUBSTANCES**

The company recognises that it has a responsibility to control the effects arising from the storage, transport and use of chemical and substances on the local, regional and global environment.

We aim to reduce the environmental impacts of our business and to operate in an environmentally responsible manner.

We will therefore endeavour to control any adverse effects on the environment associated with this issue and to comply with all relevant legal and other requirements.

### **Objectives**

The company will strive to achieve, and will also encourage others to achieve, the following objectives:

- To meet, and where appropriate exceed, all relevant environmental legislative and regulatory requirements and the requirements imposed by customers and other relative parties.
- To avoid the use of toxic materials in business operations, services and products it provides
- To prevent, minimise or render harmless releases of pollutants, in business operations and services

### **General requirements**

The company will:

- Maintain an up-to-date register of all chemicals and other hazardous substances used, stored, sold or transported by the Company together with the latest relevant manufacturer's safety data sheets.
- Routinely review processes and activities to identify opportunities to eliminate the use of hazardous materials or to use alternative less hazardous materials or to use smaller quantities.
- Routinely review processes, activities and energy requirements to identify opportunities to eliminate the storage of oils and fuels or to use smaller quantities.

- Ensure that the quantities of substances, oil and fuels stored are kept to the minimum necessary for operational efficiency.
- Provide suitably located, designed and constructed, storage tanks and facilities, which are appropriate for use.
- Ensure that all storage tanks and ancillary equipment are suitably bunded or provided with drip trays and are protected against leaks, spills or collisions.
- Ensure that the storage tanks and facilities are properly maintained.
- Design and operate the site drainage to prevent spillages entering the sewerage system, surface or subsoil waters.
- Secure the storage areas against unauthorised access.
- Properly identify all storage facilities.
- Prepare procedure documents for deliveries and emptying of storage tanks and other critical operations.
- Ensure that all appropriate personnel including contractors understand their responsibilities within the procedures.
- Ensure that all deliveries of hazardous materials, oil and fuels are supervised
- Emergency response plan for spillage, fire waters and other emergency situations.
- Prepare a documented spillage response plan including a site drainage plan is kept under review.
- Ensure that a current version of the document is available at appropriate locations.
- Train key personnel in the emergency response procedures, use of spillage containment and clean up materials and equipment and routinely test response plans.
- Provide spillage containment and clean up materials and equipment.

## **Legal compliance**

The company will endeavour to comply with and where appropriate exceed all relevant legal and other requirements.

In particular we will routinely review developments in legal provisions to ensure continued compliance having particular regard to:

## **Hazardous substances legislation**

### **Control of substances hazardous to health**

The company will endeavour to comply with the relevant legal requirements, as contained within the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and the Chemicals (Hazard Information and Packaging for Supply) Regulations 2002 (CHIP), and with the associated specific Approved Codes of Practice (HSG 193) and guidance notes issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- An up-to-date register of all chemicals and other hazardous substances used, stored, sold or transported by the company will be maintained together with the latest relevant manufacturer's safety data sheets.
- All new products will initially undergo a process of approval, using the relevant technical information and data sheets, before inclusion in the approved product range.
- COSHH assessments will be completed and recorded for all chemicals and other hazardous substances used, stored, sold or transported by the company.
- All processes and activities will be designed and operated to minimise the emission, release and spread of substances hazardous to health.
- When developing control measures account will be taken of all relevant routes of exposure (eg inhalation, skin absorption or ingestion).
- Exposure will be controlled by measures that are proportionate to the particular risks involved.
- The most effective and reliable control options will be chosen which minimise the escape and spread of substances hazardous to health.

- Where adequate control of exposure cannot be achieved by other means, suitable personal protective equipment will be provided, in combination with other control measures.
- All elements of control measures will be monitored and reviewed regularly for their continuing effectiveness.
- All employees will be provided with suitable and adequate information, instruction and training on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks, including the use of required personal protective equipment.
- When developing and introducing control measures care will be taken to ensure that it does not increase the overall risk to health and safety.

### **Regulation, Evaluation and Authorisation and Restriction of Chemicals (REACH)**

The company will endeavour to comply with the relevant legal requirements, as contained in REACH (Regulation, Evaluation and Authorisation of Chemicals).

In particular will ensure that:

Manufacturers, importers (Registrants)

- Pre-register within the specified time limits all chemicals of which more than 1 tonne per year are manufactured or imported.
- Provide the specified information dossier to the European Chemicals Agency for substance manufactured or imported at a rate of more than 1 tonne per year.
- Not manufacture or place on the market of substances on their own, in preparations or in articles without registration.
- Supply appropriate instructions to the recipient of the article.
- Identify and apply the appropriate measures adequately to control the risks identified in the chemical safety assessment and where suitable to recommend them in a safety data sheet that is supplied.
- Keep a chemical safety report available and up to date.

Supply chain factors:

- Ensure that specified information is passed to customers and that systems exist to pass information back to the suppliers at the customers request.

Downstream users

- Use substances in accordance with the information provided by the suppliers, in the form of 'safety data sheets'.

## **ASBESTOS**

The company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes managing asbestos that may be present in premises.

Common sources of asbestos in buildings include:

- Sprayed asbestos and asbestos loose packing - generally used as fire breaks in ceiling voids.
- Molded or preformed lagging on pipes and boilers.
- Sprayed asbestos used as fire protection in ducts, firebreaks, panels, partitions, soffit boards, ceiling panels and around structural steel work.
- Insulating boards used for fire protection, thermal insulation, partitioning and ducts.
- Millboard, paper and paper products used for insulation of electrical equipment.
- Asbestos pipe lagging.
- Asbestos insulation board
- Perforated ceiling tiles
- Asbestos cement products including corrugated roofing, gutters and rainwater pipes.

The company will endeavour to control the associated risks and to comply with the relevant legal requirements, as contained within the Control of Asbestos at Work Regulations 2006 and with the Approved Codes of Practice(L127 and L143) issued by the Health and Safety Executive.

In particular the following rules and procedures will be applied in relation to this area and associated work activities:

- A survey of all company buildings will be carried out to find out if there is asbestos in the premises, its amount and what condition it is in.
- All materials will be presumed to contain asbestos, unless there is strong evidence that they do not.

- A record of the location and condition of the asbestos containing materials (ACMs) or presumed ACMs in all company premises.
- An assessment of the risk from the materials will be carried out.
- A plan will be prepared that sets out in detail how ACMs are going to be managed and the risk from this material.
- Steps will be taken to put the plan into action and to review and monitor it.

Information on the location and condition of the material will be provided to anyone who is liable to work on or disturb it.

- All surveys and any required sampling will be carried out by a suitably trained person.
- All required asbestos removal work will only be carried out by a licensed contractor.

## **ENVIRONMENTAL NOISE & VIBRATION**

The company recognises that it has a responsibility to control the effects that noise and vibration generated by its business activities can have on the local, regional and global environment.

We aim to reduce the environmental impacts of our business and to operate in an environmentally responsible manner.

We will therefore endeavour to control any adverse effects on the environment associated with noise and vibration and to comply with all relevant legal and other requirements.

### **Objectives**

The company will strive to achieve, and will also encourage others to achieve, the following objectives:

To meet, and where appropriate exceed, all relevant environmental legislative and regulatory requirements and the requirements imposed by customers and other relative parties.

- To prevent community impacts associated with noise or vibration from business activities.

### **General requirements**

The company will:

- Evaluate the potential for impacts associated with noise and vibration from its activities and consider potential noise impacts in relation to proposed changes to premises, plant, equipment and operational practices.
- Use a hierarchical approach to the control of noise and vibration based on avoiding the noise creating activity, selecting quieter activities, reducing the noise generation, controlling the transmission, increasing separation between noise sources and receivers.
- Ensure that all processes, plant, equipment and any associated control technology are operated correctly to prevent abnormal noise/vibration levels.
- Implement, maintain and operate measures necessary to control noise and vibration emissions.
- Ensure proper maintenance of processes, plant, equipment and any associated control technology.

- Review process and control provisions in the light of technological developments.
- Schedule noise generating activities within the normal working day.
- Ensure that intruder alarms have an automatic shut-down after no longer than 20 minutes, are routinely maintained and that callout arrangements are in place.
- Educate all staff in the need to control site noise and the use of noise control measures.
- Where necessary routinely consult with local communities regarding local impacts.
- Implement procedures for the recording, investigation and response to complaints.

### **Construction work**

If and when the company carries out any construction operations we will ensure that:

- Operations are designed, construction methods and the plant and equipment are chosen to minimise noise impacts.
- Any site boundaries that may be sensitive to noise or vibration will be identified and operations and control measures designed to provide protection.
- Fixed plant creating high levels of noise are positioned as far away as possible from housing.
- Noise barriers and enclosures are used where necessary to minimise noise levels.
- Noisy construction operations are restricted to daytime hours.
- All fitted noise control equipment including mufflers and noise control enclosures are provided and properly used.
- All plant and machinery, silencers and noise control equipment are routinely maintained.

- Vehicle engines are turned off when not in use to reduce noise and emissions.
- The use of generators will be avoided by the use of mains electricity where possible.
- Where necessary liaison with occupants of sensitive premises is initiated and maintained throughout the project.
- A neighbourhood comment and complaint procedure will be developed for recording and dealing with complaints from local residents.
- Project contact details will be displayed in prominent locations to provide local residents with a point of contact.

### **Legal compliance**

The company will endeavour to comply with and where appropriate exceed all relevant legal and other requirements.

We will routinely review developments in legal provisions to ensure continued compliance.

We will have regard in particular to:

### **Environmental permits**

The company will comply with any conditions relating to noise or vibration attached to any permit issued under the environmental permitting legislation.

### **Planning consent**

The company will comply with any noise limits specified in planning conditions.

### **Noise Nuisance – Environmental Protection Act 1990**

The company recognises that it's activities have the potential to cause noise nuisance at premises in the vicinity of it's operations and will implement measures to minimise the impacts if noise including:

- Reviewing the operations for the potential for nuisance.
- Where possible locating noisy activities away from receivers.

- Arranging or restricting activities such as night time working, vehicle movements and tannoys to avoid intrusion at sensitive premises.
- Providing noise control measures for noisy plant or machinery.

Ensuring the proper use of noise controls including shutting doors and windows to noisy areas.

- Maintaining any noise control devices or measures.
- Maintaining a system for the recording and response to noise complaints.

### **Intruder alarms**

If the company's premises lie within a designated area we will:

- Register any intruder alarm with the local council.
- Arrange a maintenance contract and a callout agreement.
- Ensure that the alarm has an automatic shut-down after no longer than 20 minutes.
- Provide the details of a person who holds the keys to the premises.
- Train the key holder in the use of the alarm system.

### **Motor vehicle construction and use**

The company will ensure that all vehicles are operated and maintained to ensure compliance with the Motor Vehicles (Construction and Use Regulations) 1986.

In particular the company will ensure that:

- Vehicles are fitted with an efficient exhaust silencer.
- Drivers do not sound the vehicle horn in a restricted road between 11.30 pm and 7.00 am and not when the vehicle is stationary unless there is a danger to another moving vehicle.
- Drivers do not make excessive noise or run the engine unnecessarily when stationary.

## Construction noise

The company recognises that in carrying out any construction operations it must comply with the requirements of the Control of Pollution Act and the approved codes of practice.

The company therefore will:

- Use best practical means to control the noise from the operations having regard to the code of practice.
- Comply with the requirements of any notice imposing requirements served by the local authority.
- Apply for consent from the local authority for the carrying out of any proposed large construction projects.
- Comply with the conditions or limits imposed by a consent issued by the local authority.
- Take all reasonable steps to bring the consent to the attention of the person carrying out the works.

## **ENVIRONMENTAL SYSTEMS & PROCEDURES**

The company recognises that it has a responsibility to provide a working environment that is safe and poses no risk of harm to the environment and acknowledges that this includes ensuring that safe systems and procedures are developed, understood and followed.

The company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and other applicable legislation, and with the specific Approve Code of Practice (L21) and guidance notes issued by the Health and Safety Executive.

In particular the considerations that will be applied in relation to the preparation and development of safe systems and procedures will include:

- The work or tasks being carried out
- The associated potential hazards
- Any existing instructions or procedures
- Who is doing the work
- The skills and abilities of the people
- The level of control and supervision required
- The tools or equipment that are required
- The personal protective equipment required
- The associated training requirements
- Any isolation or locking off requirements
- Any permit to work requirements
- Other activities being carried out concurrently
- Communication requirements
- Emergency planning issues
- Handover procedures upon completion
- Monitoring requirements
- Review and updating requirements

The following rules and procedures will be followed in relation to this area:

- All systems and procedures will be developed by the relevant manager / supervisor in conjunction with the Environmental Manager and/or Safety Co-ordinator.
- All systems and procedures will be documented in an approved format.
- All systems and procedures will be brought to the attention of all employees and other persons that they affect.

- Regular monitoring of compliance with, and the effectiveness of, all systems and procedures will be carried out.
- All systems and procedures will be reviewed and amended, where necessary, on an annual basis or when significant changes in the activities or other matters to which they relate occur.
- All systems and procedures will be reviewed and amended, where necessary, following an accident or incident arising from the related activities, or when the results of monitoring reveals problems of compliance or effectiveness.

## **INCIDENT REPORTING & INVESTIGATION**

The company recognises that it has a responsibility to control the impacts that it has on the local, regional and global environment and aims to reduce the environmental impacts of our business and to operate in an environmentally responsible manner.

We will therefore operate systems to ensure that any potentially polluting incidents or near misses are routinely reported and investigated in order to identify causes and implement measures to reduce the potential for recurrence and to comply with all relevant legal and other requirements.

### **Definitions**

“Incident” means an incident that may result in pollution.

"Pollution" means emissions as a result of human activity which may:

- Be harmful to human health or the quality of the environment,
- Cause offence to a human sense,
- Result in damage to material property, or
- Impair or interfere with amenities and other legitimate uses of the environment.

### **Objectives**

The company will strive to achieve, and will also encourage others to achieve, the following objectives:

- To prevent, minimise or render harmless releases of pollutants, in business operations and services.
- To meet, and where appropriate exceed, all relevant environmental legislative and regulatory requirements and the requirements imposed by customers and other relative parties.

### **Aims**

The aims of the company in relation to this area are to:

- Identify events or failures that could damage the environment, for example incidental release of process chemicals.
- Carry out risk assessments to assess how likely the events or failures are to happen and the potential environmental consequences.

- Take steps to minimise both the potential causes and consequences of incidents.
- Where necessary develop an incident prevention policy setting out the risk assessment, organisational, operational, planning, monitoring and auditing measures necessary to control the identified events or failures.
- Where necessary develop an emergency response or incident management plan detailing the organisational and physical provisions and steps to be taken in the event of an incident

### **Recording and reporting**

- All employees are required to report all incidents with actual or potential environmental impacts to their manager / supervisor as soon as possible.
- For these purposes an incident is defined as any unplanned event that may result in pollution, including near misses.
- All incidents involving environmental damage must be recorded in the incident register or equivalent form of recording. This record can be made by the person present during the incident or identifying the impacts or other suitable person e.g. manager / supervisor, or other appointed person.
- All incidents must be recorded by the appropriate manager / supervisor on the company Incident Report Form.
- The completed incident report form must be forwarded to the Environmental Manager for further analysis or investigation.
- All incidents must be investigated by the appropriate manager / supervisor and recorded on the company Incident Investigation Form.
- If the incident or incident is reportable to an enforcing agency the required notification procedures as detailed below must be followed by the nominated person/s within the company.
- The Environmental Manager will be responsible for analysis and possible further investigation of all incidents and for the production of incident statistics and reports.
- Where an investigation reveals matters that are required to be implemented in order to prevent a recurrence, the required action must be taken immediately by the appropriate manager / supervisor.

- Where an investigation reveals that immediate action is required to prevent a recurrence but circumstances dictate that it is not possible or feasible, any required interim measures must be taken.

## **Legal compliance**

The company will endeavour to comply with and where appropriate exceed all relevant legal and other requirements.

We will routinely review developments in legal provisions to ensure continued compliance and ensure that we obtain all of the relevant registrations, licences, permits or authorisation for activities and operations.

We will conduct its activities to comply with the conditions applied by any registrations, licences, permits or authorisations.

We will have regard in particular to:

### **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)**

In relation to incidents that may result in pollution the company will adopt and follow procedures to ensure that the relevant enforcing authority is notified without delay.

Alternatively the Incident Contact Centre (ICC) may be informed by means of telephone, fax, internet or e-mail.

Incident Contact Centre Details:

Telephone: 0845 300 9923

Internet: [www.riddor.gov.uk](http://www.riddor.gov.uk) or via the HSE website [www.hse.gov.uk](http://www.hse.gov.uk)

E mail: [riddor@natbrit.com](mailto:riddor@natbrit.com)

Fax: 0845 300 9924

Post: Incident Contact Centre, Caerphilly Business Park, Caerphilly, CF83 3GG

## **Environmental permitting legislation**

To ensure compliance with the legislation relating to the permitting of installations under the integrated pollution prevention control regime the company will:

- Maintain and implement an accident management plan.
- Review and record at least every 4 years or as soon as practicable after an accident, (whichever is the earlier) whether changes to the plan should be made.

- Make any appropriate changes to the plan identified by a review.
- Notify the appropriate enforcing agency without delay following the detection of:
  - Any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant pollution;
  - The breach of a limit specified in these standard rules; or
  - Any significant adverse environmental effects.
- Provide written confirmation of actual or potential pollution incidents and breaches of emission limits within 24 hours.

**Environmental Damage (Prevention and Remediation) Regulations 2009**  
**The company will comply with the Environmental Damage (Prevention and Remediation) Regulations 2009 and in particular will have regard to the following:**

- Avoiding or preventing environmental damage to:
  - Protected species or natural habitats, or a site of special scientific interest,
  - Surface water or groundwater, or
  - Land.

In the event that an activity that conducted by the company causing an imminent threat of environmental damage, or an imminent threat of damage which there are reasonable grounds to believe will become environmental damage, the Company will immediately:

- Take all practicable steps to prevent the damage; and
- Notify all relevant details to the appropriate enforcing authority.

**Control of Major Accident Hazards Regulations 1999 (COMAH)**

The company will ensure that all facilities which store dangerous substances in sufficient quantities to be include within the requirements of the Control of Major Accident Hazards Regulations 1999 are managed, operated and maintained to ensure compliance with the regulations.

In particular the company will ensure that:

- All measures necessary to prevent major accidents and limit their consequences for persons and the environment are taken.

- That a major accident prevention policy document proportionate to the major accident hazards will be prepared reviewed and revised as required by the regulations. The policy will be prepared within the timescale specified and contain the specified information.

The safety management system will address the following:

- The roles and responsibilities of personnel involved in the management of major hazards at all levels in the organisation.
- The training needs of such personnel and provision of such training.
- The involvement of employees and, where appropriate, sub-contractors.
- The initiated and implementation of procedures for systematically identifying major hazards arising from normal and abnormal operation and the assessment of their likelihood and severity.
- The adoption and implementation of procedures and instructions for safe operation, including maintenance of plant, processes, equipment and temporary stoppages.
- Procedures for planning modifications to, or the design of new installations, processes or storage facilities.
- Procedures to identify foreseeable emergencies by systematic analysis and to prepare, test and review emergency plans to respond to such emergencies.
- Adoption and implementation of procedures for the on-going assessment of compliance with the objectives set by the operator's major accident prevention policy and safety management system and the investigation and taking corrective action in the case of non-compliance.
- A system for reporting major accidents or near misses, particularly those involving failure of protective measures, and their investigation and follow-up on the basis of lessons learnt.
- Procedures for periodic systematic assessment of the major accident prevention policy and the effectiveness and suitability of the safety management system; the documented review of performance of the policy and safety management system and its updating by senior management.

- Arrangements are in place for providing early warning of the incident to the local authority responsible for setting the off-site emergency plan in motion and for the provision of more detailed information as it becomes available.

## **WASTE ELECTRICAL & ELECTRONIC EQUIPMENT (WEEE)**

The company will implement measures to ensure compliance with the legislation relating to waste electrical and electronic equipment (WEEE) and in particular will:

### **As a generator of WEEE**

- Store it separately from other waste.
- Ensure it is collected, treated, reused, recovered or disposed of separately from any other waste from your business.
- Obtain and keep proof that it was given to an authorised waste-management company.
- Make enquiries to ensure that it was dealt with in an environmentally sound way.

## **TRAINING ARRANGEMENTS**

In order to ensure that employees are aware of the company's environmental commitments and their role in achieving the environmental aims and objectives the following general provisions for training have been recognised:

### **Induction training**

Induction training for new employees will take place before or on the first day of employment.

It will include:

- Presentation of the company environmental policy.
- Accident/incident reporting procedures.
- Fire prevention and emergency evacuation procedures.
- Rules and procedures relating to environmental controls and practices.
- Specific systems and procedures.
- Identification of particular significant environmental aspects.
- Environmental legislation appropriate to the organisation and the employee's obligations.
- How to obtain advice or report any concerns regarding environmental practices.
- Identity of responsible person(s) for environmental issues.

### **New managers and supervisors**

New managers and supervisors will receive training regarding their responsibilities, including:

- The relevant procedures and policies which require implementation.
- Specialist sources of advice and information available to them.
- Procedures in place for addressing any problems which may arise.

### **Job specific Training**

Detailed and specific departmental training will be provided to all new employees to supplement their general induction training and will include:

- The relevant work activities / processes.
- The work environment.
- The work equipment.
- Any particular risk(s) associated with their department work activity and/or processes.

## **Function specific training**

It is recognised there are certain functions or responsibilities carried out by some employees that require specific training. These include:

- Drivers
- Fire wardens
- Personnel involved in emergency response plans
- Personnel with environmental monitoring responsibilities

## **Existing employees**

Further training will be provided, if necessary, to existing employees if:

- They transfer to a different department.
- They take on new responsibilities.
- They are exposed to new or increased risks.
- Significant change in the work equipment, environment or systems of work.

## **Temporary employees**

Temporary employees will be provided with general environmental instructions (eg emergency procedures, site safety rules etc.) in addition to any specific instruction relevant to the department or work activities.

## **Approved training courses and providers**

The company will develop a list of approved training courses and providers including the following courses:

- NEBOSH Certificate in Environmental Management
- NEBOSH Diploma in Environmental Management
- IOSH Managing Environmental Responsibilities
- IEMA Foundation Certificate in Environmental Management
- EMA Associate Certificate in Environmental Management
- COSHH Awareness
- Risk Assessment Awareness
- Fire Safety Awareness

## **Contractors**

Steps will be taken when selecting contractors to ensure that they have a programme of training and that all relevant employees have received suitable and adequate information, instruction and training.

## **CONSULTATION**

The company recognises that it has a responsibility to manage the potential for environmental impacts from its activities, products and services and acknowledges that this policy cannot be achieved without the co-operation and commitment of employees at all levels, requiring the development and maintenance of effective means of consultation.

We will endeavour to promote consultation and to meet the requirements of the guidance contained within the environmental management standards.

Regular consultation and discussions with employees on environmental matters is therefore given high priority in order to gain their continued support and co-operation.

In particular the following rules and procedures will be applied in relation to this area:

- All employees at all levels within the Company are encouraged to participate in meetings regarding environmental management led by their manager / supervisor.
- Employees and/or their representatives are encouraged to raise concerns about environmental management matters with their manager / supervisor and will receive positive feedback on any issues raised. Any unresolved issues can be raised at the next safety meeting and / or with the Environmental Manager.
- Suitable and adequate training and other information or resources will be provided for all environmental management representatives in order to allow them to take a full and effective part in consultations.
- Employees and/or their representatives will be consulted on all matters that affect environmental management systems in their area, including relevant changes in procedures, equipment and working methods or the introduction of new technology. The feedback arising from such consultation will be considered before any decisions are made.
- Employees and/or their representatives will be kept informed of risks associated with work activities and the measures required to be taken to control those risks, including copies of relevant risk assessments and safe systems of work or working procedures.
- The company will form an Environmental Management Committee with the following terms of reference and constitution:

## **Environmental Management Committee**

The membership of the Environmental Management Committee will be subject to the agreement of the management and the respective employee representatives.

However, the committee shall include a senior managerial representative nominated by the Managing Director in order to ensure that there is adequate authority present to make decisions and with knowledge and expertise to provide accurate information to the committee on such matters as company policy, technical matters etc.

Meetings will be held on a quarterly basis, unless the Committee decides it would be beneficial to change this frequency to a more regular basis.

Each member of the Committee will receive a copy of the minutes and a copy will be placed on notice boards or brought to the attention of all employees using other alternative means of communication.

The terms of reference of the Committee will include:

- The review of any incident reports.
- Examination of environmental audit and inspection reports.
- Review monitoring and measurement reports.
- Review situation reports on position against targets and indicators.
- Consideration of reports by environmental management representatives.
- Consideration of reports by enforcement officers.
- Development and monitoring of safety rules and safe working procedures.
- Monitoring of the adequacy of communication systems.
- Make recommendations for actions for improvement or remedial measures.

## **RULES & DISCIPLINARY PROCEDURES**

The company recognises that it has a responsibility to manage the potential for environmental impacts from its activities, products and services and acknowledges that this policy cannot be achieved without the co-operation and commitment of employees at all levels.

It is recognised that this includes prescribing rules that must be followed by all employees and the disciplinary procedures that may be followed when employees breach these rules.

The company will endeavour to comply with all relevant employment legislation when considering or taking disciplinary action against employees.

This section should be read in conjunction with the Companies Working Procedures and the individuals Terms and Conditions of Employment.

It is every employees duty to observe the following general rules and to behave in a reasonable way towards management, other employees, suppliers, customers and visitors.

Where the working procedures and general rules are not followed, employees may be liable to disciplinary action, as outlined in the disciplinary procedures.

In particular the following rules and procedures will be applied in relation to this area:

### **General Rules**

- All employees are responsible for the security of any tools and equipment provided. Management reserves the right to charge for replacements where due care is not taken.
- Employees are expected to achieve and maintain a good standard of workmanship and cleanliness, and to show a conscientious approach to the job or to ensure that the detail of the job is to a standard that may reasonably be expected.
- Employees are expected to show the skill or aptitude required for the job, especially where such skills are claimed or implied at the time employment commenced.

- Employees are expected to act wholeheartedly in the interests of the organisation at all times. Any conduct detrimental to its interests or its relations with its customers, suppliers, the general public or damaging to its public image shall be considered to be a breach of the organisations rules.
- All authorised notices displayed are expected to be read and observed.
- Employees must not perform, arrange or carry out any work or activity which could be considered to be in competition with or which would adversely affect in any way the organisation's interests.
- To ensure maximum efficiency, employees are engaged on the basis that they must be prepared to undertake reasonable duties other than those for which they have been specifically engaged.
- Employees have an obligation to ensure that they conform to the requirements of the Equal Opportunities Policy, and must not act in a manner which could be considered to be of an unlawful discriminatory nature against fellow employees, customers or other people with whom they come into contact with, whilst working on company premises and / or behalf of company business.
- The telephone or postal service must not be used for private purposes without prior permission.
- Visitors are not allowed onto the premises at any time without prior authority.
- Confidential or secret information must not be disclosed at any time, either during or after employment.
- An orderly and courteous manner must be maintained in front of customers.
- Food must only be consumed in the canteens provided.
- It is not permitted to remove material or equipment of any kind from the organisation or any other place of work without prior written permission.
- The organisation's or customer's time, material or equipment must not be used for any unauthorised work.
- Employees must act in accordance with the organisations working procedures.

## Disciplinary Procedure

The purpose of the Disciplinary Procedure is to outline a recognised and consistent system to deal with any breach or alleged breach of the organisation's rules. It is the intention that, where disciplinary action is necessary, it is seen to be remedial rather than punitive.

Management undertakes to hold a full investigation into the circumstances behind any disciplinary offence, prior to the implementation of any disciplinary action.

It may be necessary, dependent upon the nature of the offence, to suspend employees on full pay whilst the necessary investigations are completed. Management undertakes to ensure that any such period of suspension will be as short as possible, and that employees are kept updated with the progress of the investigations.

Disciplinary warnings will only be issued following a formal disciplinary meeting with the employee, who will always be given the opportunity to have a witness present. Throughout the disciplinary procedure employees will be given every opportunity to respond to the allegations made against them before any decision in respect of disciplinary action is taken.

The level of disciplinary action invoked by the company will be dependent upon the severity of the offence, the employee's previous disciplinary record and length of service. Disciplinary action may take on the following forms:

### 1. Verbal Warning

Written confirmation of a verbal warning will be issued to the employee and a copy filed within the employees personnel file.

### 2. Written Warning

A copy of which will be issued to the employee and one filed within the employees personnel file.

### 3. Final Written Warning

A copy of which will be issued to the employee and one filed within the employees personnel file. On issue of a final written warning, an employee will also be advised that any further breaches of the rules will result in the employee being dismissed.

### 4. Dismissal

Such dismissal to be with or without notice depending upon the severity of the offence.

Employees will be entitled to appeal against any disciplinary decision which may be made against them, any such appeal being held in accordance with the appeal procedure.

At any time during an employees initial probationary period and / or within the first 12 months of employment, notice of dismissal may be given without resort to this disciplinary procedure. Probationary periods will not exceed 12 months or as specified at the discretion of the company

### **Rights of Appeal**

An appeal against a disciplinary decision must be notified to Mr. M. Bodley, either verbally, or in writing, within 5 working days of the disciplinary action occurring.

The appeal will be considered as soon as possible and an invitation will be made to discuss the matter fully. The outcome of this appeal will be binding on all involved.

The outcome of the appeal, together with copies of all correspondence, will be retained on the personnel file. NOTE -An employee is entitled to have another employee or a trade union representative present at any stage of the procedure.

## **MONITORING, AUDIT & REPORTING**

The Environmental Management Committee will advise on implementation and monitor progress against agreed objectives.

The Environmental Management Committee will co-ordinate and promote an improvement programme to implement the above policies, prepare regular reports on progress to senior management and publicise developments.

The Senior Management Team will annually review the effectiveness of the environmental management system and identify any changes needed

The company will include a section on environmental issues in its annual reports.

All authors preparing internal reports will be required to address the environmental implications of their proposals.