

HALLOWELL ELECTRICAL ENGINEERS LTD

ENVIRONMENTAL MANAGEMENT POLICY AND PROCEDURES MANUAL

Working Safely With



Issue Date	25/11/2023
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HALLOWELL ELECTRICAL ENGINEERS LTD

Environmental Management Policy and Procedures

AMENDMENT RECORD

Date:	Issue:	Amended By:	Comment:
05/11/2022	1	RG BR	First Issue
25/11/2023	2	RG BR	Policy Review

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HALLOWELL ELECTRICAL ENGINEERS LTD

Environmental Management Policy and Procedures

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HALLOWELL ELECTRICAL ENGINEERS LTD

SECTION 1 GENERAL STATEMENT OF ENVIRONMENTAL MANAGEMENT POLICY

Our Policy is to ensure continual improvement of our environmental management procedures. We recognise that our activities have an impact on the environment. In all our activities, working practices and business relationships we are committed to protecting, conserving and enhancing all aspects of the environment over which we have control or can influence.

To deliver our Environmental Management Policy, we will:

- Ensure that all our activities comply fully with environmental legislation and best practice;
- Set practical objectives for continuous improvement;
- Reduce resource use and re-use or re-cycle materials wherever possible;
- Use information and communication technology (ICT) to avoid excessive volumes of paper waste;
- Encourage the use of environmentally friendly materials when advising clients;
- Maintain information about the environmental impact of the goods and services we supply and make this available to enable our customers to make informed choices;
- Understand the sensitivities of our customers, including the pressures of growing and changing statutory and public concern about environmental issues, and assist them in complying with environmental best practice;
- Identify opportunities to reduce any environmental impact of our activities at an early stage and adopt these changes where appropriate;
- Communicate our environmental performance both within the Company and outside;
- Raise staff awareness of environmental issues and promote individual good practice;
- Require our suppliers to provide goods and services with the minimum adverse environmental impact, and give preference to environmentally aware suppliers whenever possible;
- Ensure that our purchases of goods and materials comply fully with UK government and EU legislation and recognised environmental best practice;
- Take all reasonable steps to prevent pollution of both our local and wider environments;
- Employ sound waste management practices, including compliance with the requirements of the Site Waste Management Plans Regulations;
- Continue to review our environmental performance, and strive to respond to issues as they arise;
- Support our local authority's green travel objectives.

Name	Claudius Hallowell
Signature	 C Hallowell (Nov 27, 2023 14:45 GMT)
Position	Director
Date	25/11/2023

SECTION 2 ORGANISATION AND RESPONSIBILITIES

Our Managing Director will:

- Retain overall responsibility for environmental management within the Company.
- Ensure that sufficient resources are allocated for the successful implementation of this policy.
- Positively promote good environmental management in all activities undertaken by the business.
- Supervise the implementation of the environmental management policy and monitor its adequacy.
- Ensure that all members of staff are made aware of the contents of this policy and their responsibilities in relation to environmental management.

Our Directors with delegated responsibility for environmental management will ensure that:

- Ensure that adequate resources are available for meeting statutory requirements relating to environmental issues;
- Monitor the effective operation of the Company's Environmental Management Policy and procedures.
- Ensure that where it is intended to undertake a new type of business, or to acquire a new company or business, an assessment is made of any environmental impact or requirements and that arrangements are made to implement any necessary actions as part of the overall business plan;
- Ensure that where it is intended to supply a new type of product, or undertake new activities, an assessment is made of any environmental impact or requirements relating to the new product or activity and, in particular, any requirement relating to meeting EC environmental directives and these requirements are implemented prior to the product being supplied to clients;
- Ensure that there are adequate arrangements in place to ensure that employees receive relevant training in environmental matters.
- Ensure that the environmental standards of work undertaken by site based staff is monitored in conjunction with the Management Team and any deficiencies are reported and corrected;

Our Managers and Supervisors will:

- Report any deficiencies which cannot be corrected to the Director;
- Ensure that arrangements are in place to explain the Environmental Management Policy to new or temporary employees on the first day of their employment;
- Ensure that the respective environmental obligations of our clients and our Company, relating to products, systems or equipment supplied by the Company, are clearly communicated and agreed with the client in writing, before supply or installation takes place;
- Ensure that site staff allocated to the contract or project are competent and adequately trained for the type of work to be undertaken;
- Ensure that there are adequate reporting arrangements in place to enable operatives to report unforeseen environmental conditions or situations encountered whilst working on client's premises or sites;
- Review, in conjunction with the directors, reports relating to environmental issues and ensure that appropriate action is taken;

All employees and labour only sub-contractors (LOSCs) will:

- Act with due regard to the environmental issues both themselves and by others, whilst they are at work, or on Company premises;
- Report to their supervisor or manager any serious environmental issues that come to their notice and which they cannot immediately rectify.
- Co-operate with the Company in preventing environmental incidents which may pose health risks to themselves, other employees and members of the public, visitors or the environment.
- Wear PPE whenever instructed to do so or in circumstances that require its use.
- Report any work conditions that they consider being environmentally unsafe at once to the Office Manager or Director responsible for H&S
- Any employee who fails to comply with the Environmental Management Policy, will be subject to disciplinary action.

Our Environmental Management Advisor (BEACONRISK) will:

The Company Environmental Management Advisor will advise on and generally co-ordinate all aspects of the Company's environmental effort. He will advise on the introduction and maintenance of systems of work to minimise the environmental impact of our activities. Specifically he will:

- Carry out inspections, at a frequency agreed with the Company, of construction sites and places of work of all employees of the Company with the person immediately responsible for that section and advise on all aspects of environmental management;
- Submit reports of his findings to the Partners for appropriate action;
- Ensure that all relevant environmental legislation is being complied with and that statutory registers are being maintained;
- Advise on environmental management training matters and assist in identifying environmental training need;
- Investigate all environmental incidents, and recommend action to prevent a recurrence;
- Act as liaison officer between Company management and official bodies such as the Local Authority and Environmental Agency.

Although the Company Environmental Management Advisor's duties are in the main of an advisory and administrative nature, he has executive authority to order the cessation of any method of working with an adverse environmental impact of which he becomes aware and to require the provision of all information necessary to carry out his duties effectively.

SECTION 3 GENERAL ARRANGEMENTS

Environmental Management Programmes and Procedures

- The Office Manager will carry out environmental impact assessments of all work activities, locations and situations to identify significant risks within the Company's operations.
- Assessments will take into account risks to the environment which may be affected by our activities.
- A central record of assessments will be maintained.
- Where significant risks are identified suitable control measures will be implemented to eliminate or reduce those risks.
- Employees will be supervised to ensure that they follow the safe methods of work identified in risk assessments.
- Where an employee or sub-contractor considers that there are uncontrolled risks within the Company they should report the matter to the Director responsible for Environmental Management.

Environmental Emergency Preparedness and Response

To check our working conditions, and ensure that our good environmental working practices are being followed we will:

- Carry out regular site inspections and report on the findings;
- Arrange for BEACONRISK to carry out regular site inspections and report on the findings;
- Review environmental impact assessments at least annually;
- Investigate environmental management issues or incidents reported by anyone;
- Keep up to date with relevant information on environmental management within our industry;
- Review the Environmental Management Policy annually and update it as necessary taking into account changes in legislation etc;
- Investigate all incidents;
- Employees and sub-contractors must ensure that all environmental incidents that occur at work are reported to the Director as soon as possible.
- Where a serious environmental incident occurs BEACONRISK will be contacted for advice.
- Where a serious environmental incident occurs an investigation will be undertaken as soon as possible by the Director with a view to determining the cause(s) of the incident and to identify any remedial actions to prevent a recurrence. BEACONRISK will provide assistance when necessary.

Environmental Responsibilities and Training

- All new employees will receive environmental induction training. A record of this training will be maintained.
- The training need of existing employees will be reviewed annually and any necessary training arranged through a suitable training organisation.
- Only suitably qualified and competent sub-contractors will be appointed by the Company.
- All sub-contractors will be required to produce evidence of their environmental management competence, and training provisions before being approved to work for the Company. The decision to employ a sub-contractor will be taken by the Director
- Sub-contractors will be required to work in accordance with the company's environmental management rules.
- Sub-contractors found to be breaching these rules will be asked to leave site immediately.

Communication on Environmental Issues

- The Company will consult with employees about environmental matters, changes to working methods and changes to substances or equipment.
- Consultation will be informal but the items discussed, the date of the discussion and any comment will be recorded
- Additionally the Director operates an “open door” policy and employees are encouraged to discuss environmental concerns at any reasonable time.

Waste Management

- The Company will consider its production of waste and develop a waste management plan. The plan will be written to follow the Company’s Policy to reduce, re-use and recycle where possible.
- Where the plan identifies disposal of waste and where appropriate we will provide suitable containers close to where the waste is produced. Waste will be taken away by a licensed carrier.
- Alternatively, we will carry our own waste from site to a transfer station to be disposed of in accordance with local waste authority rules. We will maintain a Waste Carrier’s Licence for the Company.
- Records of waste collection will be kept and monitored to ensure its proper disposal.
- When working under the control of others we will adopt any Site Waste Management Plan provided by them.

Environmental Complaints Procedure

Oral Complaints

- All oral complaints, no matter how seemingly unimportant, should be taken seriously. There is nothing to be gained by staff adopting a defensive or aggressive attitude
- Employees who receive an oral complaint should seek to solve the problem immediately (where possible) with the customer / client
- If staff cannot solve the problem immediately they should offer to get the Director responsible for Environmental Management involved or the Office Manager in his absence
- All contact with the complainant should be polite, courteous and empathetic
- At all times staff should remain calm and respectful
- Staff should not accept blame or make excuses on behalf of the Company
- If the complaint is being made on behalf of an employee or a customer, it must first be verified that the person has permission to speak on their behalf
- After discussing the problem, the employee or Director dealing with the complaint should suggest a course of action to remedy the situation. If this course of action is acceptable then the member of staff should clarify the agreement with the complainant and agree a way in which the results of the complaint will be communicated (ie through another meeting or by letter)
- If the suggested plan of action is not acceptable to the complainant then the member of staff or Director should ask the complainant to put their complaint in writing to the establishment and give them a copy of the complaints procedure
- In both cases details of the complaints should be recorded & the Director informed

Written Complaints

- When a complaint is received in writing it should be passed on to the Director responsible for Health & Safety who will send an acknowledgment letter within two working days
- If necessary, further details will be obtained from the complainant, preferably in writing
- A copy of the Complaints Handling Procedure will be forwarded to the complainant
- If the complaint raises potentially serious environmental matters, advice should be sought from a legal advisor or the Company's Health & Safety Advisor
- Immediately on receipt of the complaint the Company will launch an investigation and within 28 days should be in a position to provide a full explanation to the complainant, either in writing or by arranging a meeting with the individual or customer concerned
- If the issues are too complex to complete the investigation within 28 days, the complainant will be informed of any delays in writing
- At the meeting a detailed explanation of the results of the investigation will be given as well as an apology (if deemed appropriate)
- Such a meeting gives the Company an opportunity to show the complainant that the matter has been taken seriously and has been thoroughly investigated
- After the meeting, or if the complainant does not want a meeting, a written account of the investigation should be sent to the complainant within 28 days
- The outcomes of the investigation and the meeting should be recorded on appropriate documentation and any shortcomings in the establishment's procedures should be identified and acted upon

Environmental Policy

Final Audit Report

2023-11-27

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