



Environmental Manual



Epping Scaffolding Services Ltd

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Amendment History

Revision	Date	Author	Section / Page	Description
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Foreword

This Manual is applicable to Epping Scaffolding Services Ltd (the Company) and describes the Environmental Management System installed within the company for the compliance with the requirements of ISO 14001:2015 and is to be used in conjunction with the following standards where appropriate:

Quality standard BS EN ISO 9001:2015,
Health & Safety standard OHAS 18001: 2015

The Manual describes the Company's 3-layer system of quality documentation; Environmental Manual, Procedures and Forms.

The administration of, and the amendment to this Environmental Management System is the responsibility of the H&S Director.

The Company maintain the standards of the Environmental Management described in this manual, its associated Processes and Procedures as defined in the Manual and are mandatory to all Epping Scaffolding Services Ltd personnel.

This document is for the use within Epping Scaffolding Services Ltd only. It must not be copied in part or in whole, or passed to other companies or persons without the permission of a Director of Epping Scaffolding Services Ltd .

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Introduction

This Environmental Management Manual (EMM) contains the necessary information required by Epping Scaffolding Services Ltd (the Company) to effectively develop, manage and continually improve the management of the environmental aspects and impacts associated with the company during its normal business activities. The management system consists of policies and procedures, contained within this Environmental Management Manual, in conjunction with associated documents and records and is designed to implement the requirements of BS EN ISO 14001:2015.

The Company recognizes the importance of effectively managing its environmental aspects and impacts and that good environmental management has to be clear and demonstrable. This is because:

- Legislation demands it.
- Stakeholders expect it.
- Environmental and energy targets are achieved and maintained by it.
- The reputation of the business depends on it.
- Local ecosystems and global cycles are preserved by it.

The Company recognise that the benefits of good environmental management are:

- Long-term protection of the environment
- Reduced impact on the environment from the business activities
- Reduced number of negative environmental incidents and pollution events
- Protection of the Company reputation
- Compliance with legal duties
- Greater operating efficiency resulting in reduced costs

If we fail to manage the environmental aspects correctly, the results could be:

- Direct or indirect pollution of the environment
- Causing harm to receptors (e.g. humans, plants and animal species)
- Reputational damage to the Company and their shareholders.
- Loss operational capacity through interruptions/bad publicity or due to through defending criminal actions.
- Productive time spent investigating environmental accidents instead of working to the objectives and targets
- Disruption of the Company activities
- Increased insurance premiums

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- Criminal prosecution by enforcing authority
- Fines, imprisonment or other penalties imposed by a court of law

The adequacy and relevance of all documents in the Environmental Management System are subject to periodic review in light of changes in legislation, best practice, technology and work methods.

1. Scope

The purpose of the Environmental Management System (EMS) is:

The BS EN ISO 14001 family of standards provide a framework for consolidating and communicating how environmental management activities are managed within an organisation. They give confidence to clients and stakeholders that the services being provided meet their needs and expectations and the environmental aspects and impacts associated with and as a result of the business activities are being managed effectively to minimise the potential for negative environmental impacts to the local ecosystem, without imposing unnecessary risk on the operatives or third parties.

Within the Environmental Management Manual (EMM) the various interfaces, roles, responsibilities and communication processes utilised on a project with regard to Environmental Management are identified.

The scope of the EMM is:

The EMM describes the implementation, development and management of the processes and controls, with respect to the environmental aspects within the control of the Company, during the execution of their normal business activities.

This Environmental Management Manual forms part of the Integrated Management System¹, linked with the Company's Quality (BS EN ISO 9001: 2015) and Health and Safety (BS OHSAS 18001: 2007) Management Systems. This Environmental Management System is designed to control and monitor the implementation, effectiveness, development and improvement of the Company's business processes. The processes are used to plan, deliver, monitor, review and change the delivery of services where necessary to improve efficiency, accountability, consistency and quality of service delivered, whilst reducing operational risk.

The principal elements of this manual can be condensed into the following management requirements:

- **Purpose** – outlines the context of the organisation, needs and expectations of the Company as well as the various stakeholders relative to this purpose.
- **Alignment** – defines the principles, commitment and values related to the environmental management processes to control the potential environmental impacts which could arise as a result of activities within the control of the Company. The scope and organisational

¹ Activities undertaken within areas and by organisations outside of the control of the Company are beyond the scope of this management system.

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objectives and environmental management plans herein reflect the company needs and expectations as well as compliance with the requirements of all applicable environmental legislation. The EMS also covers the on-site work carried out by contractors, and sub-contractors on behalf of Epping Scaffolding Services Ltd Limited.

- **Continual Improvement** – establishes objectives, and targets for fulfilling the Company's purpose and its policies during its daily activities as well as identifying elements for improvement to minimise the value obtained from the assets within their control.
- **Enablers** – identifies requirements on resource management, competence or personnel and management of the processes to achieve the stated objectives, together with their methods for communication and document custodianship.

2. Normative Reference

The following documents, in whole or in part, are normatively referenced in this document and are indispensable for its application:

- **BS EN ISO 14050: 2009** *Environmental Management – Vocabulary*
- **BS EN ISO 14001:2015** *Environmental Management Systems – Requirements with guidance for use*
- **BS EN ISO 14004:2015** *Environmental management systems – General guidelines on principles, systems and support techniques*
- **BS EN ISO 9001:2015** *Quality Management*
- **BS OHSAS 18001:2015** *Occupational Health and Safety Management*

3. Terminology²

Activity

Activities (which will include products and services) are the operations of the organisation that are large enough for meaningful examination and small enough to be sufficiently understood.

Auditor

Person with the competence to conduct an audit

Continual Improvement

Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organisation's environmental policy

² Extracted and Developed from Terminology within BS EN 14001

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Corrective Action

Action to eliminate the cause of a detected nonconformity

Document

Information and its supporting medium

Environment

Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation

Environmental Aspects

An environmental aspect refers to an element of the Company's activity that can interact with and change the environment; this is the environmental equivalent of an H&S hazard (e.g., vehicle exhaust emissions, oil spillage, etc.). All environmental aspects of an organisation's activity must be considered. Some aspects are less obvious, such as aspects arising from staff travel to work, policy work and contractor's aspects when working on our behalf. These aspects are often termed indirect aspects.

NOTE A significant environmental aspect has or can have a significant **environmental impact**

Environmental impacts

This term is used throughout the document to describe, any change to the environment, whether adverse or beneficial, wholly or partly resulting from the Company's aspects. For example, an increase or reduction in emissions to air of polluting gases as a result of transport operations is an environmental impact. Other examples include pollution due to spills, climate change, ozone depletion and river pollution.

Environmental management system (EMS)

Part of an organisation's management system used to develop and implement its environmental policy and manage its environmental aspects

Environmental objective

Overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve

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Environmental performance

Measurable results of an organisation's management of its environmental aspects

Environmental policy

Overall intentions and direction of an organisation related to its environmental performance as formally expressed by top management

Environmental target

Detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives

Interested party

Person or group concerned with or affected by the environmental performance of an organisation

Internal audit

Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organisation are fulfilled

Nonconformity

Non-fulfilment of a requirement

Organisation

Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration

Preventive action

Action to eliminate the cause of a potential nonconformity

Prevention of pollution

Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts

Procedure

Specified way to carry out an activity or a process

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Record document

Stating results achieved or providing evidence of activities performed

Significant Environmental Aspects

A mandatory requirement of this document is that the Company has, and maintains, procedures to identify the significant environmental aspects of its activities that it can control, or over which it can be expected to have an influence. This document has a procedure to consider the environmental aspects, assess their significance, link significant aspects to regulatory and policy obligations, document these aspects in a significant environmental aspect register and manage them. Environmental aspects can be positive or negative in nature and have a direct or indirect impact³.

³ Direct impacts are those arising as a direct result of The Company's operations, indirect impacts are those which arise as a result of the activities of others in the Company's supply chain.

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4. Context of the Organisation

4.1. Understanding the organisation and its context

Epping Scaffolding Services Ltd was formed with the intention of providing a complete professional scaffold planning and support service to the Construction Industry, in the commercial, industrial and domestic sectors across London and the South East of England.

We offer our clients a complete support service from conception to installation and maintenance, ensuring every aspect of their requirements are met.

Our stakeholders are our employees, clients, others parts of Epping Scaffolding Services Ltd Ltd, subcontractors and consultants.

This, in conjunction with our ongoing project support and advice, combined with our bespoke services and attention to detail, differs us from similar companies and services, ensuring that the highest possible standards are attained on every project that we are responsible for.

4.2. Understanding the needs and expectations of stakeholders

The Company has stakeholders which have needs that the must be delivered in order for the Company, and its contracted obligations to be deemed to be operating correctly. The stakeholders' needs and expectations are summarised in the following table:

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Stakeholder	Relationship	Need	Expectation
Shareholders	Investor	Security and return on investment	Growth of return
Investors	Investor	Security and return on investment	Growth of return
Sub-contractors	Supplier	Safe sites	Repeat business
Clients	Client	Delivery of safe environment which is contractually compliant.	All applicable risk transferred to Epping Scaffolding Services Ltd
Other members of Epping Scaffolding Services Ltd of companies	Business partner	Stability of operations, Maintenance of reputation	Business growth, cross selling of services
Consultants	Supplier	Safe sites, innovation	Repeat business

4.2.1. Environmental Management Decision Making

The EMS is implemented and controlled by the Health and Safety Director who has the responsibility for interfacing with the clients and the Epping Scaffolding Services Ltd supply chain to determine any environmental impacts which may arise as a result of any proposals, acts or omissions.

Included within the scope of the EMS is oversight and control of the purchasing process in order to assess, and where possible/necessary, guide the supply chain to ensure that equipment, or services proposed, will not introduce an unmanageable environmental aspect or compromise the operation of the EMS. Principally this is achieved by ensuring that the supply chain members have performed sufficient due diligence such that the options presented for approval are appropriate.

Monitoring of the environmental management regime is performed by the Health and Safety Department, by means of internal audit. This monitoring is essential to ensure that the environmental controls are implemented and mitigation measures are not compromised.

4.3. Determining the scope of the environmental management system

Within the context of the Company this EMS is applicable only to the activities, areas and systems within the control of the Company.

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4.4. Environmental management system

The Company recognises that for it to effectively control its environmental aspects, a thorough understanding of those aspects and their context.

The Company has developed the EMS, policy and related procedures to enable it to identify and analyse its environmental aspects and their subsequent potential impacts, through a systematic approach which enables it to assess their significance in order to make informed. Where multiple negative influences and impacts are identified this grading will allow the Company to set priorities for action within its objectives and targets.

The EMS has been developed to reflect the environmental management objectives identified by the Company.

Control of the EMS, including document control and updating, is the responsibility of the H&S Director.

5. Leadership

5.1. Leadership and Commitment

The ultimate accountability for statutory and contractual compliance during the management of the applicable environmental aspects, which are the responsibility of the Company, sits with the highest level of management. However, it is the responsibility of everyone within the Company, and acting on their own behalf, to co-operate and work towards the objectives and intentions of the environmental management policy statement.

All Company employees and contractors under the control of the Company are responsible for their everyday actions and the effects they may have on the environment through their actions or omissions.

This section contains information about the organisational structure and resultant responsibilities for implementing the EMS to ensure that the Company policy is implemented and that the EMS is working effectively. The policy and procedures section of this system identify what is required and how it is to be achieved.

The organisational structure is developed in order to clearly identify reporting lines and areas of responsibility; supporting this are written responsibilities and rules for all personnel and specific responsibilities for key members of the management team.

5.1.1. Overall Objectives

The overall environmental management objectives have been established at senior level within the Company by the formulation of the Environmental Management Plan which is cascaded to all projects managed by the Company to enable the objectives to be tailored individually to reflect the site specific nuances within the contractual terms. The Company is committed to the overall environmental management objectives with the environmental management process being driven by Management.

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The EMS is one of a suite of documents which are in place to control elements of the Company's management processes, these documents are developed and controlled to ensure that all elements are integrated. Where conflicting requirements may exist the management document which relates specifically to the conflicted item shall take precedence.

5.1.2. Implementation and Interaction with subcontractors

In order to implement the EMS, the Company monitor compliance through regular site inspections and audits, and when considered necessary will utilise the services of our external advisors.

In order to ensure that the requirements of the EMS are reflected onto subcontractors there are formal liaison meetings and ad-hoc meetings to discuss the scope of any preventative or corrective actions to ensure that the solution offered by the subcontractor is appropriate and has involved a direct or procured decision process in order to determine the correct course of action; these liaisons are essential to ensure that the needs of the Company as a whole are considered, together with the contractual processes and obligations.

Additionally, this process acts to ensure that the environmental management decisions or policies which may be in place are not compromised by the work.

Through this process the Company can assure itself that the objectives of the EMS are communicated to its subcontractors and implemented, as far as practicable, in accordance with the objectives of the EMS to ensure that the desired outcomes are achieved.

Within the Company there are frequent meetings chaired by H&S Director where the management team can discuss operational issues, including the delivery of services by subcontractors.

In addition, the Company maintains an Environmental Aspects register which identifies all the aspects with the potential to produce environmental impacts.

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5.2 Environmental Management Policy Statement

Epping Scaffolding Services Ltd is committed to providing quality services and products for all of its projects regardless of the nature or size and to meeting the needs of all its clients by continually enhancing, reviewing & continually improving our quality systems with the intention of providing our clients with the quality of service they expect from a professional organisation.

With this in mind, it is our policy to work towards the realisation of the following objectives:

- To ensure compliance with relevant statutory requirements.
- To provide a professional service in accordance with the requirements of BS EN ISO 14001:2015 and other related company procedures.
- Total client satisfaction, measured using predetermined Key Performance Indicators.
- To be recognised by our clients as a professional organisation providing a quality, responsible service, therefore increasing the potential for further market penetration.
- The communication and implementation of the environmental policy, system and procedures at all levels of the organisation. Develop and maintain a culture that is self-critical, honest and transparent.
- Maintain an adequately resourced Environmental Assurance system that enables us to evaluate our strengths and weaknesses accurately and to respond to them accordingly.
- Review our Environmental Management system through an effective internal audit, and management review process.
- To plan and implement effective procedures to prevent pollution incidents associated with our activities

The Environmental Policy, including this statement will be reviewed on (a minimum) of an annual basis.

It is the intention of the Board of Directors that the policies and procedures outlined and detailed within this policy are implemented on each and every project; adequate resources will therefore be made available to ensure this is achieved.

The Company believes strongly that responsibility for environmental assurance lies closest to the point of actual delivery. Therefore all personnel are responsible for ensuring compliance with the requirements of the Environmental Management System which will be formally monitored using the internal audit system as required by BS EN ISO 14001:2015.

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5.2. Organisational Roles, Responsibilities and authorities

Environmental Management responsibilities have been allocated to individual members of staff (see designated key responsibilities below) to ensure that the environmental aspects relevant to the operation of the Company are managed effectively. In addition to the responsibilities of the named individuals there are responsibilities imposed on all Company staff; including members of the supply chain.

Individuals engaged in roles with prescribed key responsibilities are required to maintain specific competencies.

In order to demonstrate the collective and individual fulfilment of the Company's duties, evaluation of compliance activities are performed which are referred to in the designated responsibilities and detailed in the evaluation of compliance section.

5.2.1. Designated Key Responsibilities:

The responsibilities, authority and the interrelation of all personnel who manage, perform and verify work affecting environmental management are defined and communicated in order to facilitate effective environmental management (See organisational chart).

All people have been given authorities and responsibilities to enable them to assist in the achievement of the environmental objectives. This assignment of authority and responsibility helps to establish involvement and commitment of people throughout the organisation.

5.2.2. Designated Key Competencies:

It is the responsibility of the management team to establish, implement and maintain the competency assessment procedure.

It is the responsibility of the MD, with the assistance of the management team to ensure that staff are provided with and attend training that is identified and provided for them.

The HR Department is responsible for managing the induction and appraisals process and processing environmental training requests with managers.

5.2.3. Employee Responsibilities

All employees are responsible for acting in a professional manner whilst at work. By understanding the responsibilities and following the EMS policy and rules, employees will be helping to comply with the Company's legal duties and contribute towards the provision of safe and compliant places of work for the end users as well as reducing the environmental impacts of the Company's activities, products and services.

All employees have the following responsibilities.

- To be familiar with the contents of the Company's EMS policy.
- To take reasonable care and diligence during their day-to-day working activities.
- To follow environmental rules, procedures and instructions at all times.

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- Not to interfere with or misuse, intentionally or recklessly, any control system implemented.
- To co-operate so that as individuals and as an organisation the Company can fulfil the legal duties and requirements of the EMS, e.g. comply with the statutory regulations and contractual obligations.
- To set a good personal example in relation to the management of the work places controlled by the Company.
- Report any emergency incidents (e.g. spills) immediately.

The below Company structure shows the individual responsibilities of the management team.

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5.2.4. Legal and non-statutory requirements

The Company recognises that at all times employees and contractors operating on its behalf must remain compliant with all applicable legal and other requirements.

The Company shall utilise government and industry sources of regulation, information and best practice to maintain an up to date record of legal requirements and ensure it is aware of current consultations on proposed changes. Where this is not available through in-house resources, this additional support shall be procured from consultants within the approved the Company supply chain.

The applicability and impact of all changes to legislative and other requirements on activities and associated aspects and systems shall be assessed during management team and with the supply chain through compliance and contractual meetings.

Changes to stakeholder requirements shall be communicated through the program of routine meetings.

6. Planning

6.1. Actions to address risks and opportunities for the environmental management system

The Company recognises there are risks which can impact on the delivery of its services, including those covered by the EMS. Identified risks and implemented control measures are captured and tracked on the corporate risk register.

6.2. Environmental management objectives and planning

Objectives and targets play a key role in directing and assessing the EMS and to help the Company maintain a high standard of environmental performance.

It is the Company policy to:

- Set and prioritise management objectives and targets in line with its environmental management policy and other considerations such as
 - Statutory, Contractual requirements and applicable best practice
 - Significant environmental aspects, including those existing aspects who's significance increases as a result of a change in equipment, process or procedure
 - Commitment to continual improvement
 - Interested parties
 - Technological advancement

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- Operational and business requirements and
 - Financial
- Set realistic objectives and targets which are measurable where practicable and set against a time-scale.
- Designate responsibility to enable objectives and targets to be achieved. Personnel with specific EMS responsibilities will have these objectives and targets cascaded to their roles through the Annual Performance Review process.
- Document its environmental aspects, EMS objectives and targets and review them regularly.

7. Support

7.1. Resource

The Company management team is structured to ensure that its contracts are managed effectively, with appropriately competent personnel to perform the required roles.

Where situations exist which are beyond either the technical capabilities or beyond the risk appetite of the Company then the Company is able to procure or retain the services of external consultants or subject matter experts.

7.2. Competence

The Company is committed to competency, training and awareness to support the EMS and ensure its effectiveness.

The Company policy is to:

- provide awareness and train employees to a competent level to satisfy their roles and responsibilities as required in the environmental management system
- identify the awareness and training needs of employees and establish a plan of implementation
- evaluate if awareness and training has been effective to identify any further training needs and drive forward continual improvement
- record evidence of training, awareness and competency.

7.3. Awareness

Awareness of the EMS is achieved by periodic briefing and update sessions to staff and an overview is included in the induction of any new staff. Review of the benefits realised through the EMS, including improved environmental performance are communicated in outline through team meetings and in detail through regular management review meetings.

Where environmental management objectives and targets are allocated to individuals, performance against these is reviewed annually through the annual performance review process.

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The EMS is communicated to the subcontractors to ensure that they are aware of the aims, objectives and targets contained within it as well as the implications imposed on them to ensure that their performance is in line with the EMS and that the Company is appraised of any significant aspects or issues arising, or any impacts being realised; this is to ensure that the Company have sufficient input into the preventative/corrective process to ensure that the objectives of the EMS are not compromised.

7.4. Communication

The Company recognises effective communication is very important to the success of its EMS and the effective control of its aspects. The Company has developed this policy and procedure to enable it to manage communications effectively with interested parties and deal with requests for information, complaints and concerns. The procedure will also enable the Company to effectively communicate key information throughout the organisation in a structured approach to help implement, maintain and improve its EMS.

Communication with all stakeholders is governed by Epping Scaffolding Services Ltd protocols and the appropriate authorisations must be sought prior to the Company engaging in any communication with external stakeholders or general requests for information or correspondence.

The Company shall make its EMS available upon request to external parties.

It is the Company policy to:

- Communicate internally to staff at all levels and functions within the organisation on the requirements of the EMS.
- Record and process external communications from interested parties in a timely manner, and take appropriate action where necessary.
- Ensure that communicated responses, are accurate and understandable to the receiver.

7.5. Information requirements

This information will be influenced by identified risks to the system as identified through:

- The Corporate Risk register
- The audit process
- External audits (i.e. specialist contractors or consultants)
- Industry alerts
- Legislative Changes
- Information/trends identified by subcontractors

The Health and Safety Director is the coordinator and custodian of environmental management specific information.

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7.6. Documented Information

7.6.1. General

Environmental records are controlled and maintained to provide evidence of conformance and effective operation of the EMS. A documented procedure (EMS.Proc.001) has been established to define the controls needed for identification, storage, protection; retrieval, retention time and disposition of records, ensuring records remain legible, readily identifiable and retrievable. All electronic data is regularly backed up to a library on a secure central network system and staff access to this is via password protected terminals.

Where customers request records for particular contracts, or as defined by statute, arrangement will be made to maintain environmental records for longer periods.

7.6.2. Creating and Updating

The Company understands the importance of good documentation of its EMS to specify the way in which services are organised and undertaken in line with the Environmental Management Policy. The Company also recognises that it is essential to record how the requirements of the EMS are undertaken in order to assess the effectiveness of the system through mechanisms such as internal audit and management review. The Company considers control of documents and records to be vital in ensuring the correct information is distributed at specific organisational levels and to people with responsibilities.

It is policy of the Company to:

- Ensure the EMS is adequately documented to ensure effective control
- Ensure that any changes to the management system are captured and documentation is revised
- Ensure its documents are approved by authorised persons before being issued
- Remove all obsolete documentation from use
- Ensure records are retained for traceability and they are legible and retrievable. The Company shall retain documents and records to demonstrate the management system is effective. Documents and records shall be retained in accordance with the Company document control policy.

7.6.3. Creating and Updating

Document issue is controlled by the H&S department. Documents are labelled with the date of production as well as their version/revision status where applicable.

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8. Operation

8.1. Operational planning and control

The Company recognises the need for effective operational controls to meet its policy commitments, achieve the objectives and targets, comply with applicable legal requirements and other requirements to which it subscribes and requires in order to manage the EMS.

It is the policy of the Company to:

- ensure operational controls are documented where required, including those significant aspects the Company has an influence over.
- regularly review operational controls to ensure they work effectively and efficiently.
- regularly review the systems and controls implemented by subcontractors to ensure their continued compliance.

8.2. Management of change

The H&S Director shall review for adequacy, and modify as necessary, the information contained within the aspects register, particularly in light of;

- New and/or significant changes to the company's activities, products or services;
- Accidents, incidents, emergencies and complaints
- Non-conformance Reports

9. Performance evaluation

9.1. Monitoring, measurement, analysis and evaluation

Monitoring, measurement and evaluation of compliance is essential to help control and progress the EMS. The EMS is centred on maintained compliance with applicable legislation, regular evaluation of compliance provides the Company with analysis of its performance against the requirements of applicable regulations and required standards. Monitoring and measuring activities are undertaken and/ or arranged by the H&S Director.

The Company policy is to:

- establish monitoring and measuring indicators in relation to the EMS and the Company evaluation of compliance
- monitor performance and act on poor performance in order to achieve continual improvement

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- ensure records are kept of monitoring and measurement, calibration and maintenance of equipment and evaluation of compliance.

9.2. Internal audit

The Company is committed to continually improving its EMS. Internal audits are important to ensure that its implemented controls conform to the EMS; additionally audits form an excellent management tool for the continual process of improvement.

The Company recognises the impact that subcontractors can have on sustaining the success of its environmental management performance and as such will subject any subcontractors to second party auditing

It is the Company policy to:

- conduct internal audits at intervals appropriate to the nature and scale of the organisation.
- define, plan and structure its audits to allow careful and methodical investigation of the system to determine conformity of the system against planned arrangements and any applicable management system standards
- provide adequate resources for the audit programme
- ensure that the audit findings are included in the management review
- document all elements of the audit process – plan, programme, checklists, reports
- ensure our internal auditors are competent in EMS auditing
- act upon identified nonconformities found in internal audits

The intention is to integrate this policy with the Company integrated management system (IMS).

9.3. Management Review

The Managing Director, H&S Director and appropriate staff, review the management system at intervals of at least once a year to ensure its continuing suitability, and effectiveness. The review shall include assessing opportunities for improvement and the need for changes to the system and to verify that policies and objectives are being satisfied.

The meeting is arranged by the H&S Director and chaired by the Managing Director. Present shall be management, supervisory and personnel having responsibility for the environmental management system. Other personnel may attend where necessary to provide relevant input at the discretion and invitation of the H&S Director.

The H&S Director is responsible for minutes including observations, conclusions and recommendations issued as a result of such review. Minutes of the meeting are signed as approved by the Managing Director and retained as a quality record with all agreed actions monitored and results recorded.

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9.3.1. Review input

The management review shall, at the least, cover the following:

- * Matters arising from the previous review
- * Internal & external audit reports
- * Status of corrective and preventative actions (action reports)
- * Customer Feedback (Complaints /Questionnaire results)
- * Approved suppliers' performance monitoring
- * Review of the Management Systems
 - * Policy review
 - * Process performance and product conformity
 - * Review of processes
 - * Planned changes
 - * Recommendation for improvement
- * Review of Targets & Objectives
- * Review of "Legal Register"
- * Review of "Aspects and Impacts Register"
- * Review "Emergency Preparedness & Response Plan"
- * Organisation, Responsibilities, Training & Resources
- * Internal & External Communications
- * Audit schedule

9.3.2. Review output

The output from management review shall include any decisions and actions related to:

- * Improvement of the effectiveness of the EMS and its processes
- * Improvement of service related to client requirements
- * Resource needs

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10. Improvement

10.1. Nonconformity and corrective action

The Company understands the importance of continually improving its EMS and performance through the effective implementation of corrective and preventative actions. The Company defines nonconformity as the non-fulfilment of a process requirement.

The Company recognises the need to mitigate nonconformities and prevent their reoccurrence, and thereby preventing risks from being realised in the first instance.

The Company policy is to:

- * identify nonconformities in order to assess risks and identify their root cause
- * implement suitable action according to the severity of the risk and to prevent occurrence or reoccurrence
- * evaluate the effectiveness of implemented actions and regularly review actions and their progress
- * record all nonconformities and actions.

10.2. Preventative action

Within the Company it is the responsibility of the Management Team to ensure that the procedure is implemented effectively and records to support this procedure are readily available and up to date. Responsibilities for the correct and effective implementation within the Company fall to the H&S Director. The site supervisors and safety advisor, through regular reviews, evaluate the need for preventative or corrective action to be implemented to prevent nonconformities occurring or reoccurring.

It is the responsibility of those persons with identified EMS responsibility to record and implement corrective and preventative actions under their responsibility in a timely manner.

Routinely this monitoring is achieved through the auditing process, which enables potential risk activities or omissions to be identified early enabling preventative or corrective action to be implemented.

10.3. Continual Improvement

The Company recognises the importance of management review of our environmental management system as a means of ensuring continual suitability, effectiveness and improvement of the system and the environmental performance against the Environmental Policy. Management review effectively completes the Plan-Do-Check-Act cycle, reviewing progress to date of any changes which affect the Company and the EMS, but also serving a planning role for up and coming changes.

It is our policy to:

- * schedule regular environmental management reviews to take place at least annually.
- * ensure top level management conducts the management review and involves relevant personnel to provide and collate information as required

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- * ensure the suitability, adequacy and effectiveness of the management system is reviewed and implement improvement actions where issues are identified
- * record the findings of the management review.
- * Implement and monitor the progress of identified and implemented improvements.

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