



# Environmental Management System

## EMS Manual and Procedures

### EMS Manual Revisions

Revision Date	Description	Sections Affected	Revised by (Initials)	Approved by (Initials)
May 2011	Review	General update to whole document	TM, AC	AC
June 2011	Update EMS	Blue Collar Contract Controls, Frenchfield Football Stadium added	TM	AC
January 2012	Update EMS	Blue Collar Contract Controls	TM, AC	AC
January 2013	Update EMS	All in relation to	AW, AC	AC
March 2014	Update EMS	All sections	JL	JL

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# 1. The Environment and Eden District Council

## 1.1 Main Business Activities and the Environment

Environmental issues are central to the activities of Eden District Council. As a second tier Local Authority the Council's functions includes the provision of:

- Leisure services - including Penrith Leisure Centre, Appleby Pool and Gym and Frenchfield sports fields
- Refuse and recycling collections
- Street cleaning
- Footway lighting
- Parks and grounds maintenance
- Cemeteries
- Public toilets
- Development control and Building Regulations
- Environmental Health - food safety and hygiene, environmental protection, housing
- Council tax collection
- Payment of Benefits
- Licensing
- Parking - both on and off-street
- Town Centre management and economic development

The areas over which Council management and staff have control and which have a significant environmental impact include:

<b>Activity</b>	<b>Location</b>
Utilities - Gas	Gas fired boilers at each site
Utilities - Electricity	Predominantly lighting and IT equipment at each location
Utilities - Water	Toilet facilities and refreshments at each site
Utilities - Oil/ Diesel	Diesel back-up generators at Mansion House and Town Hall. Oil Fired heating at Frenchfield
Paper and stationery	Used at each site by staff
Staff travel	To reduce mileage required for work purposes
Photocopiers and toner	Used at each site by staff
IT and printers	Used at each site by staff
Cleaning chemicals	Used at each site by external contractor
Waste	Waste created by staff at each site
Procurement	The Council has a procurement policy which allows for environmental/ sustainability issues to be considered.
Redundant electrical goods	Mostly redundant IT equipment at each site

Batteries	Mostly for cordless equipment and cameras - Town Hall
Mobile phones	Extensively used at each site

Service contracts, which commenced between 1 April 2012 to 28 July 2012 for upto 15 years include:

- Refuse collection
- Street cleaning
- Building cleaning
- Dog Services
- Pest Control
- Footway Lighting
- Grounds maintenance
- Recycling (Bring sites and street collections)
- Building maintenance
- Leisure centre management

The new contracts for all the above services incorporate environmental targets and there is a requirement to assist the Council to reduce carbon emissions. The Conditions of Contract clause 7.5 applies:

*Environmental Performance*

*7.5.1 The Contractor shall ensure that the Services are performed in a manner which is at all times consistent with Law, Guidance and Good Industry Practice in relation to environmental matters, particularly with regard to:*

- a) achieving continuous improvement in environmental performance;*
- b) achieving a two percent (2%) year on year reduction in carbon dioxide (CO2) emissions in accordance with the Authority's Carbon Management Plan (from all aspects of the operation of the Service including all Plant, local and head office CO2 emissions). The baseline year will be the twelve (12) month period preceding 1st April 2012.*

- c) *enhancing the appearance of the street scene;*
- d) *reducing traffic congestion;*
- e) *minimising noise pollution;*
- f) *minimising air pollution, in particular through the use of driving techniques that reduce fuel use, and by using low emissions technology and fuels in all vehicles deployed to deliver the Services;*
- g) *avoiding contamination of land and water;*
- h) *protecting street trees; and*
- i) *complying with the provisions of the Authority's policies on "green" procurement.*

*7.5.2 The Contractor must demonstrate an up-to-date working knowledge of best environmental management practice and shall advise the Authority in relation to the improvement of environmental management in relation to any part of the Services that the Authority reasonably requests.*

*7.5.3 The Contractor shall update annually the Environmental Sustainability Policy set out in the Method Statements which must be submitted to the Authority for approval on or before each anniversary of the Commencement Date. No updates to the Environmental Sustainability Policy shall be deemed to form part of the Method Statements until the Authority has confirmed its written approval.*

## **1.2 Environmental Management System (EMS)**

As an environmentally aware organisation, managing environmental issues in a systematic way is important to us. Through the continual development of our EMS we endeavour to make our products and services more sustainable. Maintaining our EMS to the CBEN Gold Award Standard will help us minimise the negative impacts and maximise our positive impact on the environment.

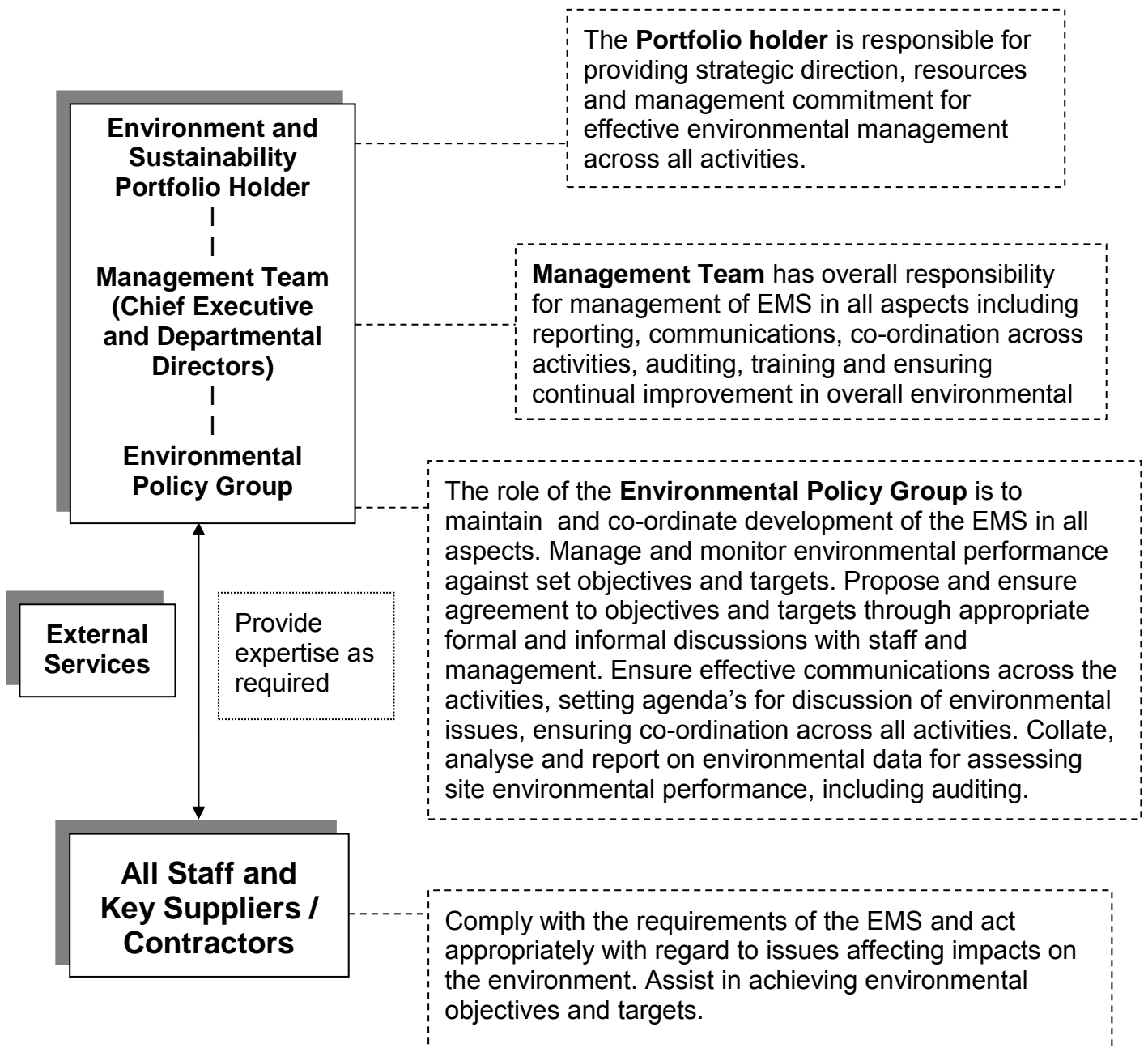
The scope of our EMS includes all the Council's administrative buildings namely, **Town Hall, Town Hall Annex, Mansion House and Penrith Museum/TIC** from which the activities in 1.1 above are managed and we have identified the aspects and impacts we have control over.

## **1.3 Structure, Roles and Responsibility**

As a small Council there is a relatively simple EMS management structure. The Council Leader is supported by an Executive of six portfolio holders. Responsibility for environmental matters falls to the Environment and Sustainability Portfolio Holder. The Executive in turn is supported by Management Team (Chief Executive and Departmental Heads). The Environmental Policy Group meets six monthly and comprises officers from across the Authority and reports directly to Management Team (MT). MT meets weekly and its deliberations are minuted. The diagram below should be viewed within this backdrop, with MT taking overall responsibility for ensuring the roles and responsibilities are fulfilled.

## Structure


## Roles and responsibilities



## 1.4 Environmental Policy Statement

### Executive Summary

#### Our Commitment



Eden District Council recognises that it has a wide-ranging impact on the environment through its use of energy, water, transport and waste generation. In addition to this, the Council is responsible for the provision of a number of environmental services, and is involved in raising awareness, and setting an example to partners and the wider community. It is therefore important that the Council takes responsibility for its environmental impact.

#### Legislation

We will meet and where possible exceed current and future environmental legislation and regulatory requirements.

We will look towards best practice to see where we can reduce our environmental impacts of our activities and policies.

We will ensure employees are aware of environmental legislation and operational procedures.

#### Climate Change

We will reduce green house gas emissions, notably carbon dioxide and methane.

We will ensure, where possible, buildings and services are able to adapt to climate change.

We will monitor, manage and minimise the Council's use of energy.

#### Natural Resources and Waste

We will monitor, manage and reduce the Council's use of water.

We will minimise the amount of waste produced by the Council and encourage greater reuse, recycling and composting.

We will use the least environmentally damaging goods and services where possible.

We will minimise harm from land which is contaminated or polluted

#### Landscape, Wildlife and Heritage

We will manage buildings under the Council's control to conserve, enhance and restore local heritage.

#### Education, Implementation and Monitoring

We will consider environmental factors in Council decisions and activities.

We will continually develop environmental objectives and targets and introduce best practice to reduce environmental impacts.

We will educate and train employees and members to conduct their activities in an environmentally responsible manner.



## 2. Significant Aspects and Impacts; Environmental Risks

### 2.1 Identification and Significance Rating

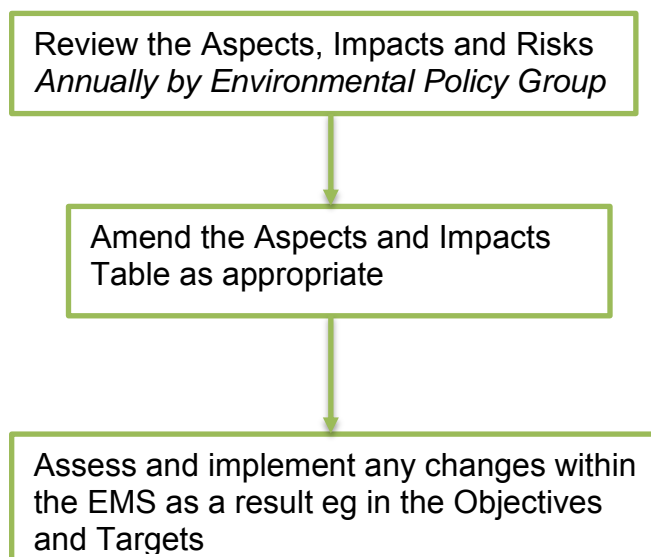
We recognise that it is important to identify and assess our environmental aspects, impacts and risks. Having identified these, we have entered the significant aspects on a table with our objectives and targets. The table also takes into consideration our environmental risks. Any identified significant risks have been assessed in accordance with the process shown in section 2.3.

In considering the significance of our environmental aspects and impacts we have taken into consideration the following:

- Regulatory and Legal control
- Effectiveness of Management Control
- Possible Severity
- Probability of Occurrence
- Duration of Impacts
- Ease of Remediation
- Probability of External Concern
- Probability of Adverse Effect on Image

In setting our targets we have considered whether we have a direct control over the impact or if we only have influence over it. We will review our aspects and impacts on an annual basis, making a formal note of the date and the outcomes as part of our annual Management Review of the EMS.

### 2.2 Flow Chart - Assessment Procedure



## 2.3 Assessment of Identified Significant Environmental Risks

### Environmental Risk Assessment of Potential Emergencies and Incidents

Organisation and Site: Eden District Council, **Town Hall**

Site Assessment Date: March 2014 (Previous Feb 2009, May 2011, Nov 2012)

Methodology

<b>Occurrence</b>	Unlikely	1	2	3
	Likely	2	4	6
	Very Likely	3	6	9
		Minor	Moderate	Major
	<b>Severity</b>			

Scores of 1 and 2 are acceptable risk;

Scores of 3 and 4 need further investigation with a view to further mitigation and/or controls;

Scores of 6 and 9 are unacceptable risk and need further mitigation and/or controls putting in place

Scoring Table using the above methodology

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
Utilities - Gas	Gas leakage into atmosphere. Excessive use of natural resources	CP12 annual inspection and servicing of all gas equipment. Gas usage monitored on quarterly basis to identify trends. Upgrade of exhaust extract via balanced flue mechanism. Exhaust failsafe	1	1	1
	Inadequate combustion or wastage resulting in CO or CO2 emissions into atmosphere	As above	1	1	1
Utilities - Electricity	Energy wastage resulting in excess CO2 emissions into atmosphere.	Electricity usage monitored on quarterly basis to identify trends. One Site project - ongoing.	1	1	1

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
	Excessive use of natural resources	Rationalised and balanced three Phase supply dedicated to Sever room function			
Utilities - Water	Excessive use of natural resources	Push taps in toilets. General awareness amongst staff to conserve water . Hippos in toilet cisterns. Faults reported to Property & Contracts section Property & Contracts section. Water usage monitored on quarterly basis to identify trends. Identified and rectified water loss and inaccurate metering process. Removal of unnecessary water storage tank from attic space	1	1	1
Utilities - Diesel	Diesel spillage resulting in ground or ground water contamination	Self bunded tank complies with OFTEC standards however pipework and joints not protected	1	3	3
Paper and stationary	Excessive use of natural resources	Stationary - none Toilet paper - all recycled	2	2	4
Staff travel	CO, CO2 , NOx and particulate emissions and Ozone production	Staff aware of the need to plan journeys to minimise mileage.  Reduction in the number of staff receiving essential user.  Awareness campaign - Green week.	3	3	9

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
Photocopiers and toner	CO2 emissions resulting from excessive power usage.	Most efficient copiers used (laser printers) so minimising toner use. Reduction in number of colour copiers. Copiers turn off when not in use.	1	1	1
IT and printers	CO2 emissions resulting from excessive power usage.	Green IT policy to minimise energy usage and rationalise printers. Rationalisation of colour printers	1	1	1
Cleaning chemicals	Minor spillage or release into atmosphere or water course (through sewer)	Cleaning contractor operates policy to use green products. Adherence to COSHH Regs	1	2	2
Waste	Use of landfill	Paper recycling in each office and plastic, glass and can recycling in kitchens Additional recycling facilities on site	1	1	1
Procurement	Excessive use of natural resources	Council policy to use email as the preferred method of communication. Preference for electronic tendering. The Council's Procurement Guide allows for consideration of environmental issues	1	2	2
Invoicing and staff payments	Excessive use of natural resources	Wages slips sent out electronically, invoices paid by BACs.			
Redundant electrical goods	Use of Landfill	Items either recycled or disposed of in accordance with WEEE Regs	1	1	1
Batteries	Filling of landfill site with inappropriate	No facility for the disposal of batteries.	1	3	3

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
	material	Recycling Services now offered on site. Funding dependant			
Mobile phones	Filling of landfill site with inappropriate material	Items either recycled or disposed of in accordance with WEEE Regs	1	2	2
Redundant office furniture	Filling of landfill site with inappropriate material	Items recycled or reused	1	1	1

Methodology

<b>Occurrence</b>	Unlikely	1	2	3
	Likely	2	4	6
	Very Likely	3	6	9
		Minor	Moderate	Major
	<b>Severity</b>			

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Scoring Table using the above methodology

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
Utilities - Gas	Gas leakage into atmosphere. Excessive use of natural resources	CP12 annual inspection and servicing of all gas equipment. Gas usage monitored on quarterly basis to identify trends	1	1	1
	Inadequate combustion or wastage resulting in CO or CO2 emissions into atmosphere	As above	1	1	1
Utilities - Electricity	Energy wastage resulting in excess CO2 emissions into atmosphere. Excessive use of natural resources	Electricity usage monitored on quarterly basis to identify trends. One Site project accommodation review re: reducing energy use - ongoing Internal communication of consumption data.	1	1	1
Utilities - Water	Excessive use of natural resources	Push taps in toilets. General awareness amongst staff to conserve water . Hippos in toilet	1	1	1

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
		cisterns. Faults reported to Property & Contracts section. Water usage monitored on quarterly basis to identify trends Identification of high utility usage via monitoring process has lead to remedial works to water service and metering inaccuracies remedied			
Paper and stationery	Excessive use of natural resources	Stationary - none Toilet paper - all recycled	3	2	6
Staff travel	CO, CO2, NOx and particulate emissions and Ozone production	Staff aware of the need to plan journeys to minimise mileage. Reduction in the number of staff receiving essential user.  Awareness campaign - Green week	3	3	9
Photocopiers and toner	CO2 emissions resulting from excessive power usage	Most efficient copiers used (laser printers) so minimising toner use. No colour copiers Copies set to default on double sided.	1	1	1
IT and printers	CO2 emissions resulting from excessive power usage	Green IT policy to minimise energy usage and rationalise printers. Printer shut down when not in use.	1	1	1
Cleaning chemicals	Minor spillage or release into atmosphere or water course (through sewer)	Cleaning contractor operates policy to use green products. Adherence to COSHH Regs	1	2	2
Waste	Use of landfill	Paper recycling in each office and plastic, glass and can recycling in kitchens  Additional facilities now on site	1	1	1

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
Procurement	Excessive use of natural resources	Council policy to use email as the preferred method of communication. Preference for electronic tendering. The Council's Procurement Guide allows for consideration of environmental issues	1	2	2
Redundant electrical goods	Filling of landfill site with inappropriate material	Items either recycled or disposed of in accordance with WEEE Regs	1	1	1
Batteries	Filling of landfill site with inappropriate material	No facility for the disposal of batteries. RE-cycling facility now available subject to funding	1	3	3
Mobile phones	Filling of landfill site with inappropriate material	Items either recycled or disposed of in accordance with WEEE Regs	1	2	2
Redundant furniture	Filling of landfill site with inappropriate material	Items recycled or reused	1	1	1



Methodology

<b>Occurrence</b>	Unlikely	1	2	3
	Likely	2	4	6
	Very Likely	3	6	9
		Minor	Moderate	Major
<b>Severity</b>				

Scores of 1 and 2 are acceptable risk;

Scores of 3 and 4 need further investigation with a view to further mitigation and/or controls;

Scores of 6 and 9 are unacceptable risk and need further mitigation and/or controls putting in place

Scoring Table using the above methodology

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
Utilities - Gas	Gas leakage into atmosphere. Excessive use of natural resources	CP12 annual inspection and servicing of all gas equipment. Gas usage monitored on quarterly basis to identify trends.	1	1	1
	Inadequate combustion or wastage resulting in CO or CO2 emissions into atmosphere	As above	1	1	1
Utilities - Electricity	Energy wastage resulting in excess CO2 emissions into atmosphere. Excessive use of natural resources	Electricity usage monitored on quarterly basis to identify trends. One Site project accommodation review re: reducing energy use - ongoing	1	1	1
Utilities - Water	Excessive use of natural resources Possible contamination of Thacka Beck water course from	Push taps in toilets. General awareness amongst staff to conserve water. Hippos in toilet cisterns. Faults reported to Property & Contracts	1	1	1

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
	basement drainage	section. Water usage monitored on quarterly basis to identify trends See below			
Utilities - Diesel	Diesel spillage resulting in ground or ground water contamination	Generator is segregated and bunded to prevent leakage. All drainage to Thacka beck has lock-down covers to prevent contamination ingress, however pipework and joints not protected Underground diesel tanks have been replaced with new bunded storage facility located within the basement	1	3	3
Paper and stationery	Excessive use of natural resources	Stationary - none Toilet paper - all recycled	3	2	6
Staff travel	CO, CO2 , NOx and particulate emissions and Ozone production	Staff aware of the need to plan journeys to minimise mileage. Reduction in the number of staff receiving essential user.  Awareness campaign - Green week	3	3	9
Photocopiers and toner	CO2 emissions resulting from excessive power usage	Most efficient copiers used (laser printers) so minimising toner use. Reduction in the number of colour copiers	1	1	1
IT and printers	CO2 emissions resulting from excessive power usage	Green IT policy to minimise energy usage and rationalise printers	1	1	1
Cleaning chemicals	Minor spillage or release into atmosphere or water course (through sewer)	Cleaning contractor operates policy to limit harmful chemicals. Adherence to COSHH Regs	1	2	2
Waste	Use of landfill	Paper recycling in each office and plastic, glass and can recycling in	1	1	1

<b>Incident/ Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
		kitchens. Additional facilities now on site			
Procurement	Excessive use of natural resources	Council policy to use email as the preferred method of communication. Preference for electronic tendering. The Council's Procurement Guide allows for consideration of environmental issues	1	2	2
Redundant electrical goods	Filling of landfill site with inappropriate material	Items either recycled or disposed of in accordance with WEEE Regs	1	1	1
Batteries	Filling of landfill site with inappropriate material	No facility for the disposal of batteries Re-cycling now available dependant upon funding	1	3	3
Mobile phones	Filling of landfill site with inappropriate material	Items either recycled or disposed of in accordance with WEEE Regs	1	2	2
Redundant Furniture	Filling of landfill site with inappropriate material	Items recycled or reused	1	1	1

Methodology

<b>Occurrence</b>	Unlikely	1	2	3
	Likely	2	4	6
	Very Likely	3	6	9
		Minor	Moderate	Major
	<b>Severity</b>			

Scores of 1 and 2 are acceptable risk;

Scores of 3 and 4 need further investigation with a view to further mitigation and/or controls;

Scores of 6 and 9 are unacceptable risk and need further mitigation and/or controls putting in place

Scoring Table using the above methodology

<b>Incident/Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
Utilities - Electricity	Energy wastage resulting in excess CO2 emissions into atmosphere. Excessive use of natural resources	Electricity usage monitored on quarterly basis to identify trends. Museum refurbishment for included energy saving measures (LED lighting)	1	1	1
Utilities - Water	Excessive use of natural resources	General awareness amongst staff to conserve water . Hippos in toilet cisterns. Faults reported to Property & Contracts section. Water usage monitored on quarterly basis to identify trends	1	1	1
Paper and stationery	Excessive use of natural resources	Stationary - none Toilet paper - all recycled	3	2	6
Staff travel	CO, CO2 , NOx	Staff aware of the	3	3	9

<b>Incident/Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
	and particulate emissions and Ozone production	need to plan journeys to minimise mileage. Reduction in the number of staff receiving essential user.  Awareness campaign. Green Week.			
Photocopiers and toner	CO2 emissions resulting from excessive power usage	Most efficient copiers used (laser printers) so minimising toner use. Reduction in the number of colour copiers	1	1	1
IT and printers	CO2 emissions resulting from excessive power usage	Green IT policy to minimise energy usage and rationalise printers	1	1	1
Cleaning chemicals	Minor spillage or release into atmosphere or water course (through sewer)	Cleaning contractor operates policy to limit harmful chemicals. Adherence to COSHH Regs	1	2	2
Waste	Use of landfill	None	3	3	9
Procurement	Excessive use of natural resources	Council policy to use email as the preferred method of communication. Preference for electronic tendering. The Council's Procurement Guide allows for consideration of environmental issues	1	2	2
Redundant electrical goods	Filling of landfill site with inappropriate material	Items either recycled or disposed of in accordance with	1	1	1

<b>Incident/Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
		WEEE Regs			
Batteries	Filling of landfill site with inappropriate material	No facility for the disposal of batteries	1	3	3
Mobile phones	Filling of landfill site with inappropriate material	Items either recycled or disposed of in accordance with WEEE Regs	1	2	2
Redundant Furniture	Filling of landfill site with inappropriate material	Items recycled or reused	1	1	1

Organisation and Site: Eden District Council, **Frenchfield Football Stadium**

Site Assessment Date: March 2014 (previously May 2011, Nov 2012)

Methodology

<b>Occurrence</b>	Unlikely	1	2	3
	Likely	2	4	6
	Very Likely	3	6	9
		Minor	Moderate	Major
	<b>Severity</b>			

Scores of 1 and 2 are acceptable risk;

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Scoring Table using the above methodology

<b>Incident/Emergency situation identified</b>	<b>Possible Environmental Impact</b>	<b>Controls in place</b>	<b>Occurrence</b>	<b>Severity</b>	<b>Score</b>
Utilities - Gas (Calor)	Escape to atmosphere through impact damage/rupture/vandalism of tank or service pipework	Monitor	1	1	1
Utilities - Diesel	Contamination of land and/or watercourse by diesel escape	Upgrade of existing single bunded tank to double bunded.	2	2	4
Utilities - Water	Excessive use of natural resource	Monitor activity of pitch sprinkler system	1	2	2
Flooding	Contamination of land/watercourse and impact on biodiversity. Through failure of Sustainable Urban Drainage System (SUDS)	Cleaning regime of hard surfaces	1	1	1

### 3. Objectives and Targets; Monitoring and Measurement

#### 3.1 Setting and Managing Objectives and Targets

In order to make continual improvements to our environmental performance, we recognise the need to set ourselves achievable objectives and targets, implementing them through environmental improvement programmes. Our definition of objectives and targets are:

*Objective* - Overall goals for environmental performance arising from environmental policy

*Targets* - Specific, quantifiable aims to be achieved within a time-frame.

Our objectives and targets set will be consistent with our environmental policy statement as documented in section 1.4 of this manual. They are set out in this section of the manual, which will be reviewed annually as part of our EMS Management Review. The performance against them will be documented in the Review notes.

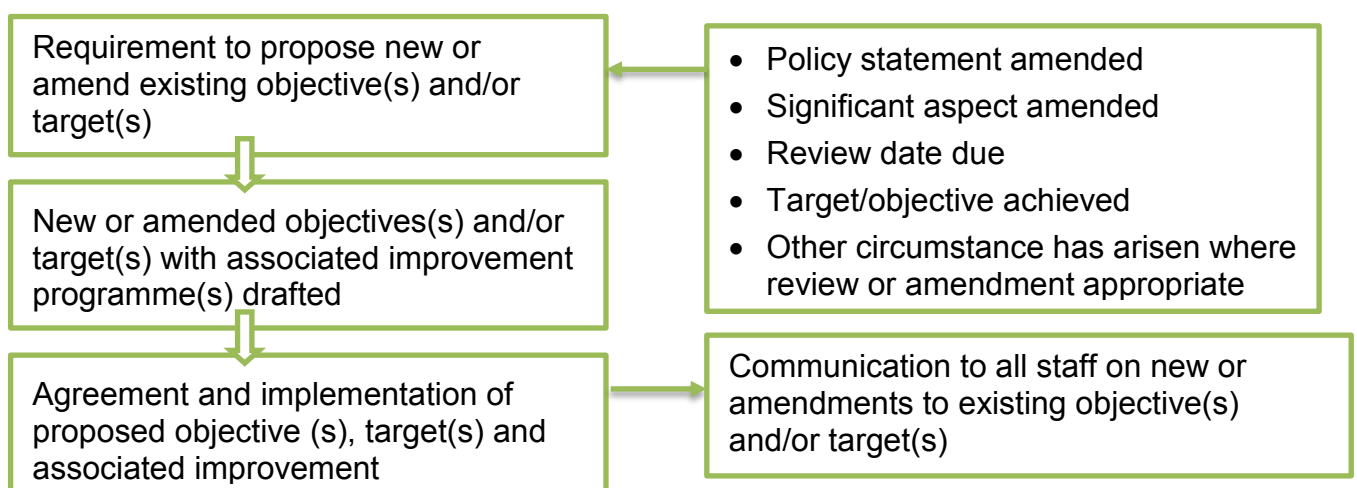
Any actions needed to ensure targets are being properly managed, monitored and measured will be identified through the year and appropriate action taken by the Property and Contracts Manager in co-ordination with relevant staff.

When setting objectives and targets the following will be considered:

- a) Legal and other requirements
- b) Technological options
- c) Financial, operational and business needs
- d) Commitments made in the environmental policy statement

The Council chose to participate in the Local Authority Carbon Management Programme Phase 7 during 2010. Baseline data has been gathered for 2008/09 and the Council has set a CO2 reduction target of 25% over 5 years (up to 2014/15), which accords with the Cumbria Strategic Partnership's Climate Change Commitment (also 25%).

#### 3.2 Flow Chart - Annual Review Procedure





## Eden District Council - Environmental Objectives And Associated Targets - 2014

	Objectives	Significant Aspects References	Targets	Monitoring Measurements	Actions Taken
1	Reduce Council's CO2 emissions year on year over next 5 years (from its own estate) (i.e. maximise energy, fuel and water use efficiency)	Gas and oil for space and water heating Electricity - lighting and power Fuel - Vehicles Water - sanitation	3% year on year reduction in Building's CO2 emissions (Reduction in CO2 from Council operations) Publication of 5 year Carbon Management Plan (in accordance with Local Authority Carbon Management Programme Phase 7)	Annually (spreadsheet)  Compliance with Key Actions of the Corporate Plan and subject to the scrutiny of Corporate Plan monitoring process	Thin Client Computers installed Corney Square windows replaced with secondary glazing 'Therma-fleece' installed into Council buildings Close off disused Air ducting to Council Chambers and Committee rooms Optimise Balance of Three Phase supply for Town Hall Server room Secondary Glazing to Corney Square and Town Hall Optimise heating controls Rationalise all Admin lighting Optimise external lighting by use of time clocks Manage exterior foliage to maximise natural lighting Limit availability of portable heaters Remove/manage use of electrical appliances - general

IMPORTANT NOTE - This is a controlled document and is only valid for 1 month from the date of printing 08/08/2014

## Eden District Council - Environmental Objectives And Associated Targets - 2014

	Objectives	Significant Aspects References	Targets	Monitoring Measurements	Actions Taken
					<p>Encourage culture change - Green week.</p> <p>Isolate heated towel rail.</p> <p>Put in place time clocks for all suitable electrical appliances.</p> <p>Install timed lighting system to Mansion House Basement.</p> <p>Remove redundant point of use heater from print room services.</p>
2	From 2012 reduce CO2 and NOx emissions from vehicles carrying out operations on behalf of the Council	Fuel - Vehicles	<p>&gt;25% reduction (on 2008/09 figures) in vehicle emissions (all vehicles operating on behalf of the Council) (Reduction in CO2 from Council operations) and (Air quality - % reduction in NOx and primary PM10 emissions through local authority's estate and operations).</p> <p>To be achieved as a result of new contracts for all services from</p>	Vehicle emission criteria included in new service contracts	<p>Blue Collar &amp; Leisure Tenders completed. All new vehicles meet Euro 5 standards.</p> <p>Successful operators have carried out Route Planning assessments and reviews in order to minimise emissions and maximise efficiency.</p>

IMPORTANT NOTE - This is a controlled document and is only valid for 1 month from the date of printing 08/08/2014

## Eden District Council - Environmental Objectives And Associated Targets - 2014

	Objectives	Significant Aspects References	Targets	Monitoring Measurements	Actions Taken
			April 2012. Acceptable vehicle emission levels were written into these contracts. To introduce company travel plan to encourage other forms of transport by March 2015.		
3	By 2015 reduce total CO2 resulting from Council operations by 25%	Gas, water and oil for space and water heating. Fuel - Vehicles Water - sanitation Waste	25% reduction in total CO2 emissions for both buildings and vehicles by 31 March 2015.	Recording of carbon footprint	Thin Client Computers installed. Corney Square & Town Hall windows replaced with secondary glazing. Therma fleece installed into Council buildings Ecosol. Lighting rationalisation/ upgrade investigation and efficiency study undertaken. 'Power Perfector' Electrical Optimisation project underway. Hourly consumption data supplied
4	Operate within all applicable statutory environmentally-related obligations	Waste management Disposal of redundant electronic equipment Surface water	1. Maintain legal compliance  2. Work to official	1. Zero non-compliances with legal requirements 2. Level of compliance with	Contractors and operators supervised for assurance of compliance.  All compliances either met or

IMPORTANT NOTE - This is a controlled document and is only valid for 1 month from the date of printing 08/08/2014

## Eden District Council - Environmental Objectives And Associated Targets - 2014

	<b>Objectives</b>	<b>Significant Aspects References</b>	<b>Targets</b>	<b>Monitoring Measurements</b>	<b>Actions Taken</b>
	requirements	discharges Use of substances hazardous to health	guidance 3. Identify any significant environmental risks and control them in accordance with recognised best practice	official guidance 3. Documented significant environmental risks	superseded.
5	Implement environmental awareness training for all Council staff	Gas and oil for space and water heating. Electricity - lighting and power Fuel - Vehicles	3% year on year reduction in Building's CO2 emissions (Reduction in CO2 from Council operations). Energy consumption data to be provided on a monthly basis and communicated through the staff intranet. Environmental awareness to be included in new staff inductions and all current staff inducted by April 2015..	Office 'champions' in place	Publish Utility monitoring information (graphs) on Corporate bulletin board.

## **4. Environmental Management Programmes**

### **4.1 Managing our Environmental Management Programmes**

We recognise the need to have a documented procedure for establishing, maintaining and amending our environmental programmes. However, we feel that environmental programmes themselves may not need to be documented and we will use our discretion on whether these are needed. Our definition of an environmental programme is: a series of time-tabled tasks designed to achieve our objectives and targets for established significant environmental aspects.

Environmental Programmes will state the following:

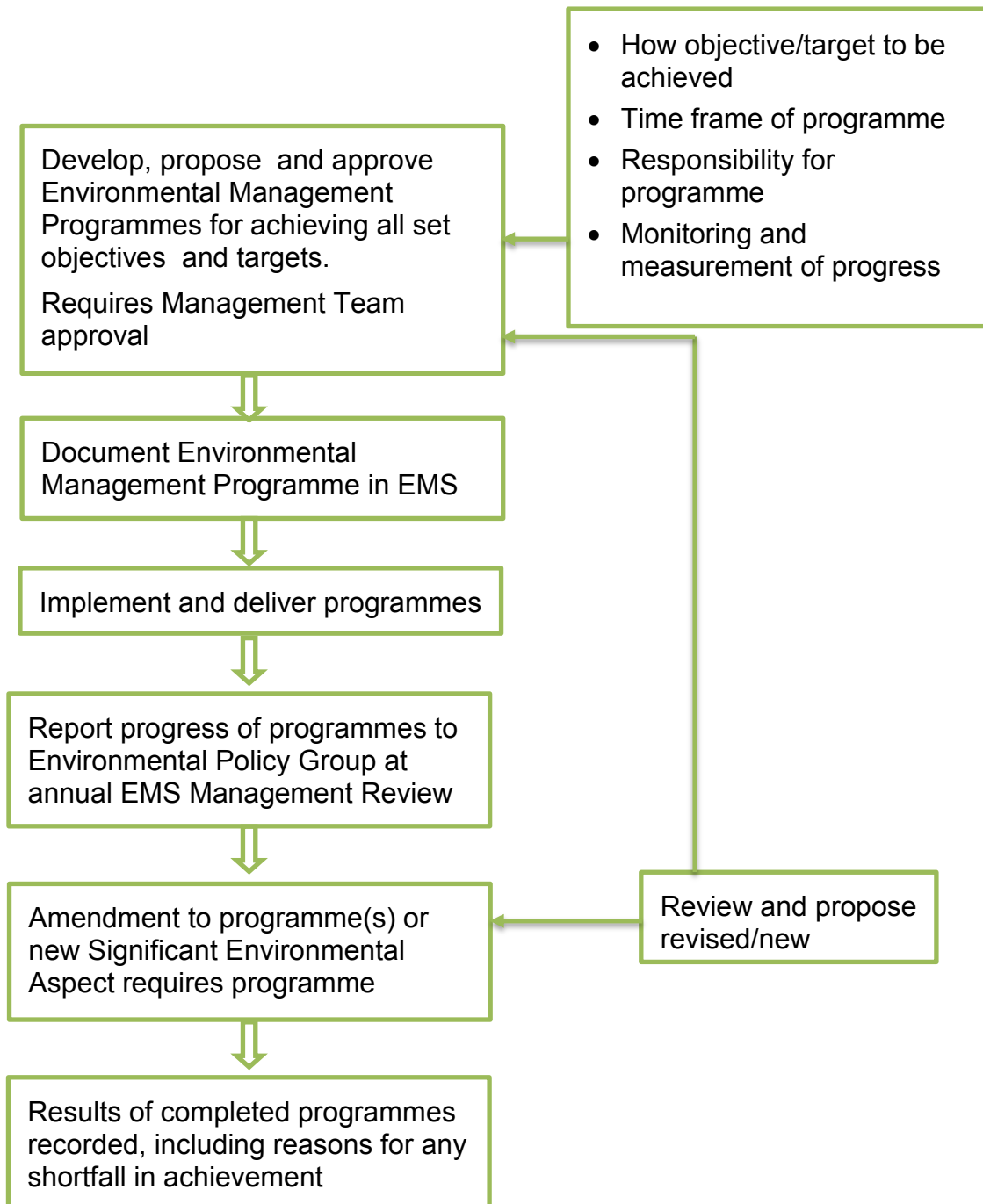
- i) The means by which the programme will achieve the set objectives and targets.
- ii) The time-frame of the programme.
- iii) The person(s) responsible for delivering the programme.
- iv) The means and frequency of monitoring the programme and the units of measurement.
- iv) Once completed, the result of the programme ie if the objectives and targets were achieved and if not, the reasons why.

At the same time as objectives and targets are established for significant environmental aspects, programmes to achieve them will be drawn up if deemed helpful. It will be the responsibility of the Property and Contracts Manager to implement and deliver such programmes in consultation with relevant staff. Management Team will be made aware of and approve all proposals for any particular Environmental Management Programme.

Progress of the programmes will be reported by the Property and Contracts Manager to Environmental Policy Group at the annual EMS Management Review where any further amendments will be suggested and approved. The Property and Contracts Manager will be responsible for ensuring implementation of any recommended changes. Any newly identified significant environmental aspect(s) will have objectives, targets and an environmental programme established for them as soon as it is practicable to do so.

Should anyone with responsibility for Environmental Management Programmes propose that an amendment to a programme be made, a review of the existing programme will be undertaken. Should any amendments be approved a revised document will be prepared and authorised. The amended programme will be appropriately communicated and implemented.

## 4.2 Flow Chart - Programme Amendment



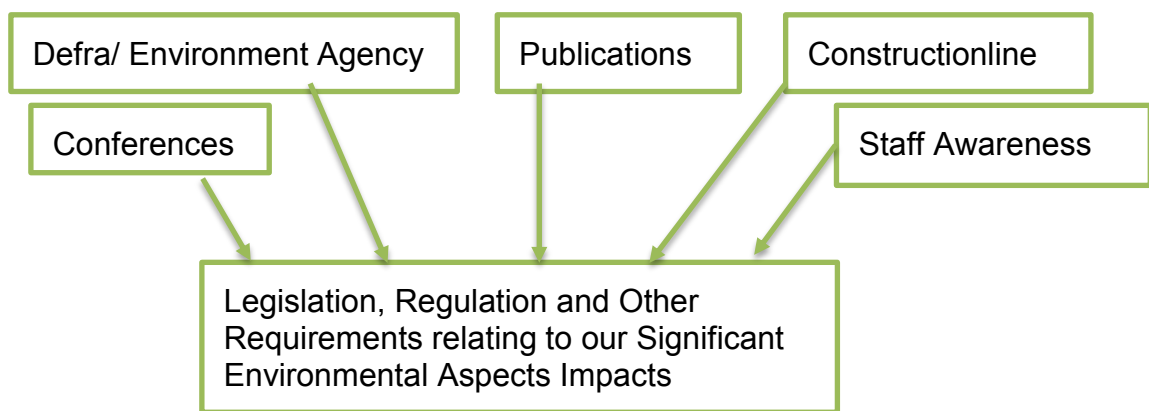
In April 2010 the Council published a five year carbon management plan that considers energy, water and waste reduction. This currently is the only Environmental Management Programme.

## 5. Environmental Legislation

### 5.1 Identification and Compliance with Legislation, Regulatory Requirements and Other Requirements

We recognise our duty to comply with statutory requirements that relate to our activities, products and services. We further recognise that this goes beyond environmental legislation to all that relates to our significant environmental aspects and impacts.

The Council is required to comply with various legislation in the performance of its duties. The sources of information we use to ensure we are aware of current and incoming legislation, regulation and other requirements are as follows:



The Council's business operates across a wide variety of professions, as such Council officers are members of a number of professional bodies. Changes and amendments to legislation and codes of practice are passed on to officers by attendance at seminars and training courses by each professional organisation or by regular email alerts from those professional bodies. The costs incurred in such training is supported by the Council where appropriate and identified as Continued Personal Development (CPD) through the appraisal process. It is required that each officer be responsible for disseminating such changes to appropriate colleagues and/or officers. In this way the Council is able to meet statutory compliances.

In addition the Council subscribes to a number of services (eg Constructionline) which contribute to the agenda by screening suitable contractors who help the Council in the provision of its services.

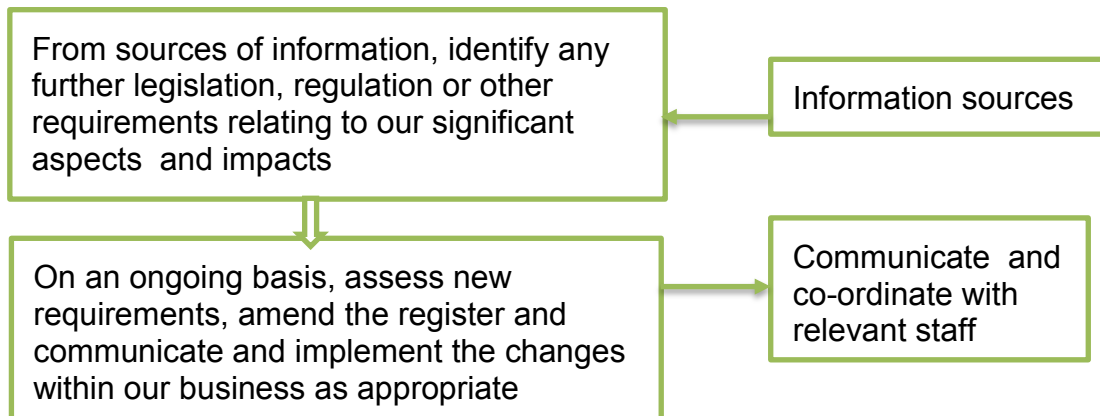
As part of our commitment to compliance with legislation applicable to our significant environmental aspects and impacts, we will review legislative issues formally on an annual basis during the CBEN annual assessment. The main legislation relating to the Council's Activities include:

<b>Legislation</b>	<b>Activity</b>	<b>Existing controls</b>
Environmental Protection (Duty of Care Regulations (SI1991/2839) as amended (SI2003/63))	Controlled Waste storage	Incorporated within existing service contract documents.
Environmental Protection (Duty of Care Regulations (SI1991/2839) as amended (SI2003/63))	Disposal of waste paper	Material collected in designated containers in offices, and then taken by cleaners to storage point where collected by recycling contractor
Environmental Protection (Duty of Care Regulations (SI1991/2839) as amended (SI2003/63))	Disposal of waste cardboard	Material collected in designated containers in offices, and then taken by cleaners to storage point where collected by recycling contractor
Environmental Protection (Duty of Care Regulations (SI1991/2839) as amended (SI2003/63))	Disposal of waste plastic	Material collected in designated containers in kitchens, and then taken by cleaners to storage point where collected by recycling contractor
Environmental Protection (Duty of Care Regulations (SI1991/2839) as amended (SI2003/63))	Disposal of waste cans and tins	Material collected in designated containers in offices, and then taken by cleaners to storage point where collected by recycling contractor
Environmental Protection (Duty of Care Regulations (SI1991/2839) as amended (SI2003/63))	Disposal of waste glass	Material collected in designated containers in offices, and then taken by cleaners to storage point where collected by recycling contractor
Environmental Protection (Duty of Care Regulations (SI1991/2839) as amended (SI2003/63))	Disposal of used printer and toner cartridges	Material collected in designated containers in offices and collected by recycling contractor
Environmental Protection (Duty of Care Regulations (SI1991/2839) as amended (SI2003/63), Waste Electrical and Electronic Equipment Regulations 2006)	Disposal of waste electrical and electronic equipment including IT and communication equipment	All IT hardware is recycled and given to charity. Mobile phones are recycled by the Council's recycling contractor
Environmental Protection	Disposal of	Furniture is reused within Council



Legislation	Activity	Existing controls
(Duty of Care Regulations (SI1991/2839) as amended (SI2003/63)	redundant furniture	offices whenever possible. Redundant furniture is recycled
Control of Pollution (Oil Storage (England)) Regulations 2001	Storage of heating oil in quantities above 200litres. By 1 September 2005, all relevant tanks close to watercourses had to comply with approved secondary containment systems	Storage complies with regulations
Hazardous Waste Regulations 2005	Need to be registered with the Environment Agency and there is a duty on the Council to ensure that any hazardous waste is disposed of correctly	The Council does not produce 500kg/ yr of hazardous waste and thus the Regs do not apply
Control of Pesticides Regulations 1986 (as amended 1997), Plant Protection Regulations 1995, Biocidal Products Regulations 2001	Storage and use of pesticides	Incorporated within existing service contract documents

## 5.2 Flow Chart Procedure



## 6. Competence, Training and Awareness

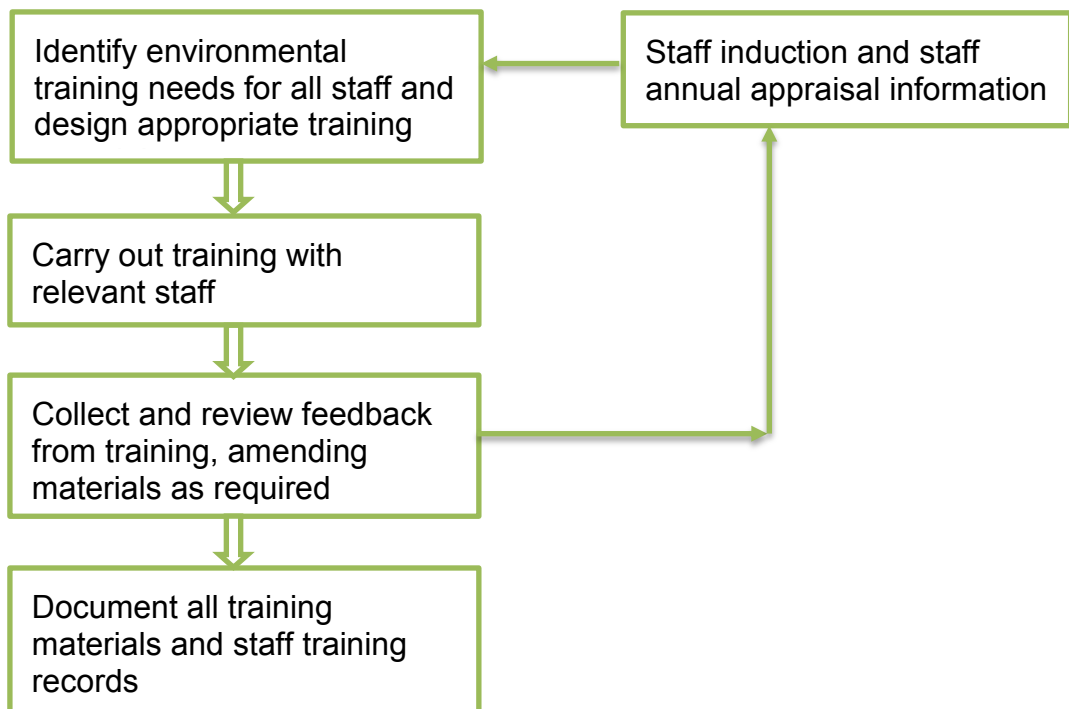
### 6.1 Identifying Training Needs

The Council recognises that it is important to train all staff in general environmental awareness, in particular that relating to our operations. This information may be provided in various forms such as presentations, departmental briefings, wall mounted notices and the Council's staff intranet. At present, awareness does not form part of the initial staff induction process (see section 4).

The Human Resources section will identify environmental training needs for Council staff and design, write and approve the appropriate training materials – this is to be in place by December 2014. Where appropriate training needs will also be identified as part of the annual staff appraisal process and some staff will receive additional environmental training if their work directly relates to identified significant environmental aspects/impacts or has the potential to create a significant impact on the environment. Records of all staff environmental training undertaken will be held by Human Resources.

Feedback from any training undertaken will be collected and the training materials will be evaluated for their effectiveness. It will be the responsibility of the Human Resources Manager to review such feedback and amend training materials as necessary, keeping them up-to-date with changing legislation, requirements etc.

### 6.2 Flow Chart - Training Procedure



## 7. Environmental Emergencies and Incidents

### 7.1 Identifying, Managing and Documenting Environmental Emergencies and Incidents

We recognise our duty to develop a procedure which lays out the way in which potential environmental emergencies and incidents are identified and managed and how emergency response procedures will be documented, reviewed, amended and tested.

We define an environmental emergency as follows: *A significant unauthorised/uncontrolled release of a substance or substances in any form (eg a gas, a liquid, a solid, a nuisance such as noise, vibration, odour or any combination of these) into the environmental media (air, land, water) requiring **immediate and urgent** action to prevent or minimise environmental impact(s) which would be likely to result in any one or a combination of the following:*

- (a) *The calling of any emergency service*
- (b) *The notification of the Environment Agency or Local Authority Environmental Health Officer and which is likely to result in any form of action by them*
- (c) *Legal proceedings against the organisation under environmental legislation*
- (d) *Justifiable complaints from local residents and/or environmental groups*
- (e) *Significant long/medium-term environmental damage/harm eg to humans, flora, fauna, water/land contamination, property*

We define an environmental incident as follows: *Unauthorised/uncontrolled release of a substance or substances in any form (eg a gas, a liquid, a solid, a nuisance such as noise, vibration, odour or any combination of these) into the environmental media (air, land, water) requiring action to prevent or minimise environmental impact(s) which would be likely to result in any one or a combination of the following:*

- (a) *The calling of any emergency service*
- (b) *The notification of the Environment Agency or Local Authority Environmental Health Officer*
- (c) *A breach of environmental legislation*
- (d) *Complaints from local residents and/or environmental groups*
- (e) *Identifiable environmental damage/harm eg to humans, flora, fauna, water/land contamination, property*

Significant environmental incidents and emergencies that are considered to be a possibility include:

- a) Oil fire or spillage at Frenchfield sports pavilion
- b) Gas emission or fire at Town Hall, Mansion House and Corney Square
- c) Legionella outbreak at any Council building

d) Contamination of water source from Council owned contaminated land

The Council's contracts with external providers cover Emergencies and Incidents.

With regard to contaminated land the Council has a strategic action which states: *To adhere to legislation contained within the Environmental Protection Act, a collection will be made of contaminated land data and entered onto the Historic Land Use Database.*

A dedicated resource has been made available since 2009-10 and it will be the responsibility of the Contaminated Land Officer and Environment Portfolio Holder.

The Council (along with the other Districts in Cumbria) funds an Emergency Planning Officer post employed by Cumbria County Council. As such the Council has detailed emergency planning procedures in place capable of dealing with a) to c) above. An annual testing of the robustness of these emergency planning measures is undertaken by officers from across the Council. Those staff involved with emergency planning have extensive and ongoing training. In addition the Council has a business continuity plan should a significant environmental incident or emergency occur.

The Emergency Planning Officer will review and amend the procedures following (a) a periodic procedure review (b) an incident enquiry/investigation (c) testing effectiveness of procedures and emergency preparedness and responded annually.

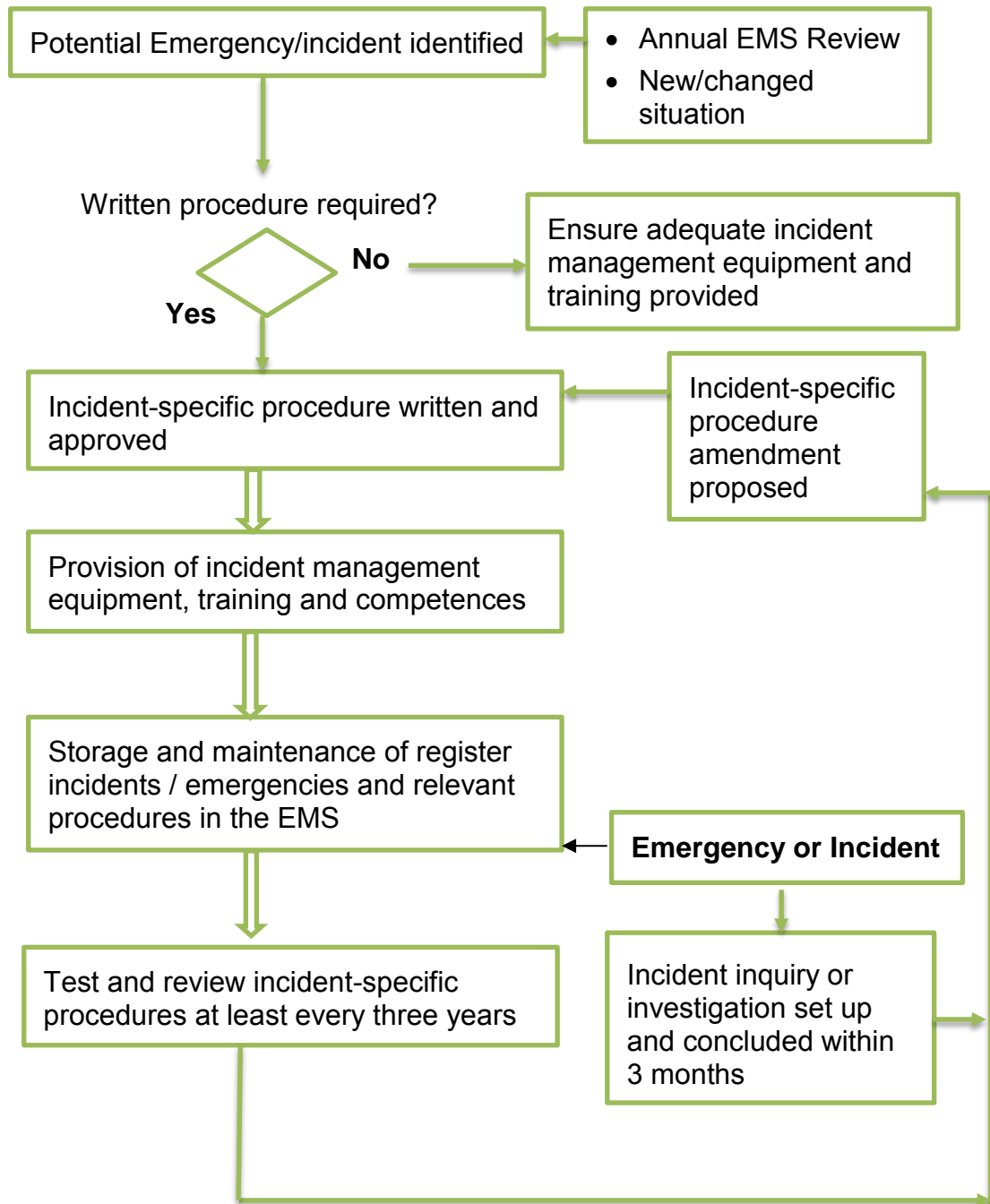
It is the responsibility of the Management Team and the Emergency Planning Officer to communicate emergency and incident preparedness and response procedures to appropriate staff to a level that they can manage any environmental emergencies and incidents within their areas of responsibility and assist in the following inquiries/investigations.

It is also the responsibility of the Property and Contracts Manager to store and maintain a register of incidents/emergencies and incident-specific procedures within the EMS, detailing the department to which the procedure and incident relates in addition to the outline information of the incidents. To date (March 2014) there have been no incidents or emergencies. The details in the record will include a description of (a) how the incident occurred, the date on which it occurred and any relevant associated background information, (b) the extent of the incident including quantities and nature of the substances involved (c) the actions taken (d) any necessary remedial steps (e) external bodies involved and/or notified together with any action they took (f) the overall outcome in terms of the environmental damage, estimates cost, complaints and effects on the organisation's reputation, (g) any environmental legislation breached, (h) how the incident may be prevented in the future (i) any follow-up action (with responsibility for them indicated), including the date these actions were completed and by whom.

After every environmental emergency/incident there will be, as soon as practical, an inquiry or investigation. Management Team will decide on the

level of inquiry or investigation required to be undertaken into each emergency/incident. The minimum will be a report providing the details given above for more minor incidents, up to a panel of enquiry and full management-led investigation for analysis of emergency situations. The target time for completion of such inquiries/investigations is within one month for the more minor incidents to within three months for emergency situations and the more major incidents.

## 7.2 Flow Chart - Emergency Planning Procedure



## **8. Internal and External Communications**

### **8.1 Internal Communication Mechanisms**

We recognise the need to ensure that an effective internal system of communication between staff is in place regarding environmental issues and the Environmental Management System (EMS). General EMS information to be communicated to all staff will include our overall energy performance, results of EMS audits, changes to policy, procedures and new environmental initiatives. This will take the form of briefing meetings, paper based material, notice boards, Green Day event and the Council's intranet. Function-specific information will be communicated to the relevant staff by similar means.

Information regarding the EMS and other environmental issues shall be communicated to staff as part of the induction training process and through continued training. This is monitored by the Property and Contracts Manager.

The Property and Contracts Manager will be responsible for responding to any environmental queries from staff. During training briefings, talks etc, the Property and Contracts Manager will be available to staff to voice their opinions on environmental matters, any queries which are unable to be adequately answered will be noted and answered when the information is available.

Once a formal enquiry has been received, the Property and Contracts Manager will decide upon the best course of action to take. This could include: a) Dealing with the enquiry directly; c) Seeking information from sources such as a consultant or an environmental organisation. The Property and Contracts Manager will ensure that the query is resolved as far as practicable. After responding to the communication in the most appropriate manner, the Property and Contracts Manager must later ensure that the communication is documented within the EMS including; a) The date of the query; b) Who the communication was between and who the enquirer was; c) What means of communication were used; d) What the Communication was about; e) What the eventual outcome of the communication was; f) Any actions resulting from the communication.

### **8.2 External Communication Mechanisms**

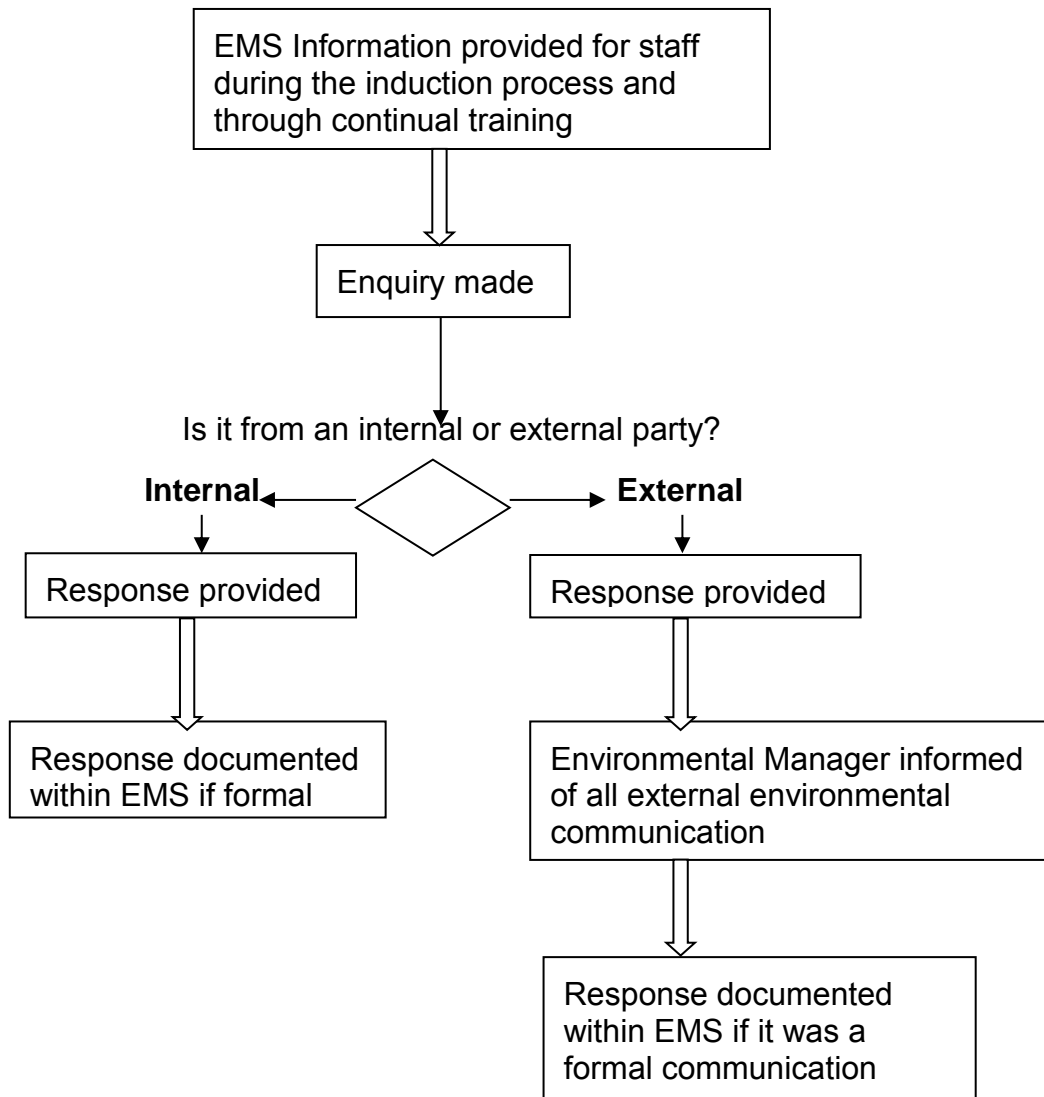
We recognise that it is important the state how environmental communications from external interested parties will be received, documented and responded to.

Any employee receiving a communication from an external interested party via any medium (eg telephone, letter, email, direct verbal) may respond to the enquiry provided they are adequately informed in order to do so. If the member of staff receiving the communication is unable to provide a satisfactory response, the Property and Contracts Manager will be consulted. Once a formal enquiry has been received, the Property and Contracts Manager will follow the above procedure in responding and collate all the information necessary to provide a satisfactory response. In the event of a visit in person by an external interested party, either announced or

unannounced, the Property and Contracts Manager will ensure that the immediate enquiry is dealt with either directly or by an appropriate member of staff. Follow-up information/action may also, of course, be needed for an adequate response.

Any member of staff responding to an external communication must ensure that the Property and Contracts Manager is informed of any environmental communication. The Property and Contracts Manager must then record the information in the above documented fashion.

### 8.3 Flow Chart - Reporting Information Procedure



## **9. Document Control and Records**

### **9.1 Creation, Maintenance, Updating and Disposal of Documents**

We recognise that it is important to have a system whereby documents are controlled within the Council's file Management System. This encompasses the creation, maintenance, updating and disposal of all documents and data.

Each document will be titled, numbered and sub-sectioned. An explanation of all procedures in this format is given in the Contents of this manual. Each document will have a version number and date the version was written/amended. At the foot of each document will be the date the document was last printed and the period for which the hard copy is valid. This period is 30 days. If a document is accessed electronically and amended/alterd in any way, that current date will be displayed at the foot of each document.

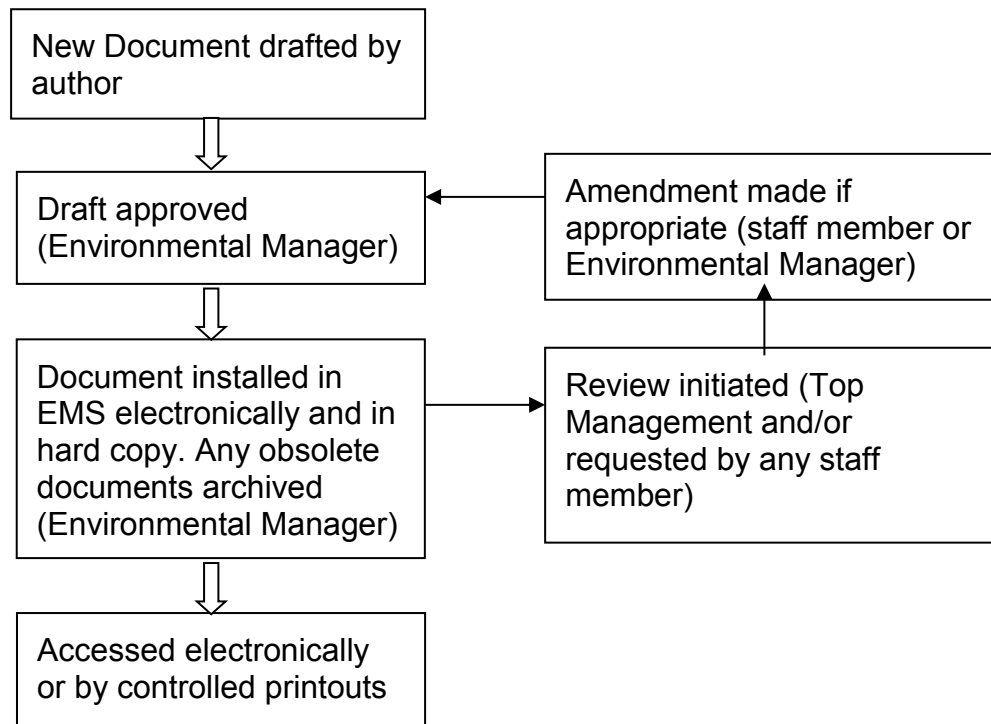
Any outdated documents will be removed from the EMS and replaced by a current version, clearly displaying the version number. Outdated documents will be stored electronically for reference and to reflect progression/improvement. If the document has been superseded, the date on which this occurred will be included.

The Property and Contracts Manager will be solely responsible for amending and/or granting permission to amend or otherwise update documents. Anyone can apply for a document to be amended by contacting the Property and Contracts Manager and stating in writing/email the reason for amendment and the suggested amendment. All such correspondence will be stored in the EMS. If an amendment is deemed appropriate, the Property and Contracts Manager will make a copy in electronic form of the document and either make the amendment to the new copy or forward it to the amendment requester to draft a proposed amendment. The proposed amendment will be passed back to the Property and Contracts Manager who will approve and input the new version of the document into the EMS. The superseded document will be archived electronically and retained for a minimum of five years. The new document will be clearly labelled as an amendment to the previous document stating the date altered and the number of the amendment. In circumstances where amendments need further discussion they will be raised at the next Environmental meeting.

The Property and Contracts Manager will also be responsible for informing relevant staff of any amendments to documentation within the manual and disposing of obsolete material. All documentation is to be stored electronically, access to which is unrestricted on a 'view only' basis. Printed copies can be made available to anyone. Any document printouts will show the document control details as headers and footers.



## 9.2 Flow Chart - Document Control Procedure



## 9.3 Storing and Tracking EMS Records

Records are defined as: *collections of information (including data), however held, relating to the EMS and/or the operation of it eg waste transfer notes.*

It is the responsibility of the Property and Contracts Manager to maintain records to the standards detailed in ISO 14001:2004 Section 4.5.4. This includes the collection, indexing, filing, storage, retrieval and retention of all records and the provision of up-to-date details stating where and in what form the documents are held and who is responsible for access to them. The Property and Contracts Manager will verify record locations annually to ensure that all EMS records are in the correct place and that they are being kept to the requirements of Section 4.5.4 of ISO 14001:2004. This may be achieved through the EMS audit programme.

The Property and Contracts Manager will authorise changes and additions to EMS records arising from new developments. Unless otherwise agreed by the Management, all EMS records will be kept for a minimum of 5 years.

## 10. Writing, Updating and Reviewing Policy, Procedures and other Key Documents

### 10.1 Identification of Responsibilities

We acknowledge the importance of documenting our process for writing, updating and reviewing all our documents including EMS documentation. It is

the responsibility of the Property and Contracts Manager to write and amend all procedures maintained in this manual and ensure that each conforms with the procedure described here. It is also the responsibility of the various Council Officers to approve all new and amended documentation before it is filed by ensuring its accuracy and in compliance with this procedure and Document Control described in Procedure 9, contained in this manual. The Property and Contracts Manager will also ensure that once authorised, new or amended procedures are electronically added to the EMS and that superseded documents are properly archived.

All documentation will be reviewed in the annual EMS Management Review in accordance with Procedure 12 contained in this manual. It is the sole responsibility of Management Team to write, review and update all Council policies relating to the EMS on an annual basis and/or if circumstances change. Anyone can apply for any other document or procedure to be amended in accordance with Procedure 9 contained in this manual.

## **10.2 Defining the Contents of a Procedure**

Procedures shall be split into sections. The number and content of each section will vary from procedure to procedure, depending on the scope of the procedure and its importance to the successful functioning of the organisation's EMS.

- The opening section will invariably describe why the procedure has been created, the extent of the procedure and what it achieves. Any definition of terms to be used in the content of the procedure shall be done here to reduce ambiguity.
- Definitions of responsibilities will form an essential part of all procedures, as will work instructions to be carried out by each.
- If any documentation results from a procedure, such as the documenting of complaints or queries, the content of such correspondence will be defined. (For example, Procedure 8).
- Procedures describing a process will include a flow chart to clearly illustrate the procedure.
- All procedures will comply with the Document Control of Procedure 9, including the archiving of superseded procedures.

## **11. Auditing; Non-Conformances, Corrective and Preventative Actions**

### **11.1 Procedure for EMS Audits**

The Council recognises that it is important to document the scope, frequency, roles and methodology of our EMS audit system. An EMS audit is defined as *a: systematic and documented verification process of objectively obtaining and evaluating audit evidence to determine whether an organisation's EMS conforms to the EMS audit criteria and communicating the results of this process to the client.*

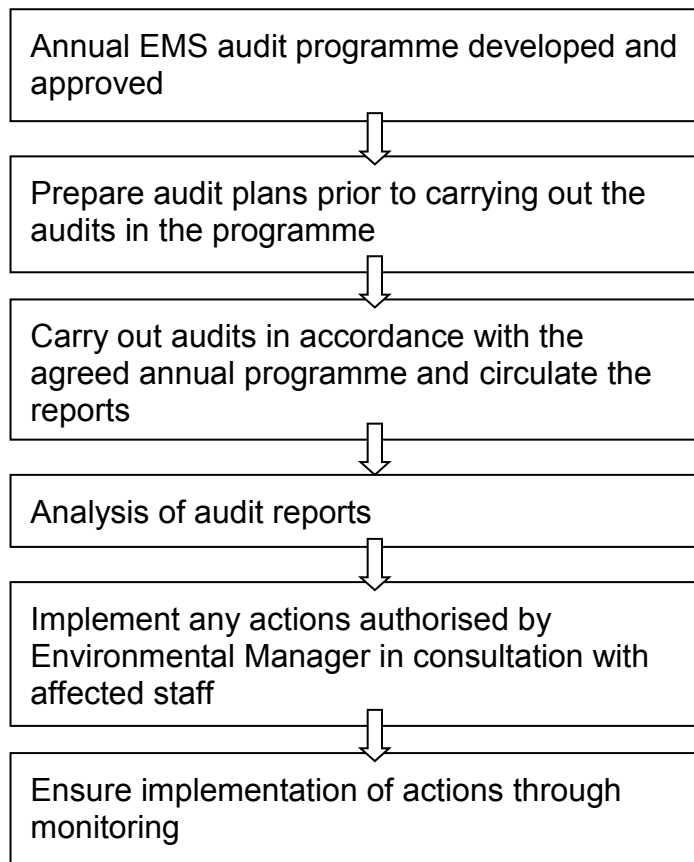
Our audits will check compliance with the CBEN Gold Award Specification, ensure planned arrangements are adhered to and supply sufficient information to management on audit results. All audits will be conducted in accordance with ISO 19011:2002, *Guidelines for quality and/or environmental management systems auditing*.

Auditing of the Council's documents, contracts and policies is carried out by the Council's Senior Auditor and on occasion by external auditors. It is the responsibility of the Senior Auditor to write and approve any EMS audit programme detailing; (i) the number of audits to take place (ii) the areas of the EMS to be audited (iii) when the audits are to be conducted (iv) who will conduct the audits. Following an audit, the Property and Contracts Manager will decide on and authorise any action deemed appropriate from an EMS audit report (and analysis) as soon as practicable following completion of it (and in any case within 3 months its completion). The Property and Contracts Manager will monitor the efficiency and effectiveness of implementation of such authorised action(s), ensuring that they are carried out within an acceptable time frame. Audits will be undertaken annually; the next audit is due in July 2013.

***Auditor:***

The auditor will ensure efficient and effective conduct and completion of the audit within the audit scope and approved plan. On the completion of an audit, the auditor will write a report which shall be distributed in accordance with Sections 6.6 - 6.6.2 of ISO 19011:2002. The Property and Contracts Manager must be included on any EMS audit distribution list.

## 11.2 Flow Chart - Audit Procedure



## 11.3 Procedure for Non-Conformances, Corrective and Preventative Actions

This procedure states how non-conformances within our EMS are identified and processed, how corrective or preventative actions are identified, implemented and monitored and how any action to mitigate environmental impacts will be decided upon and implemented.

We have identified two types of non-conformances:

**Type A** (Priority 1) - an element (or a number of elements) of the EMS do not comply with CBEN Gold Award.

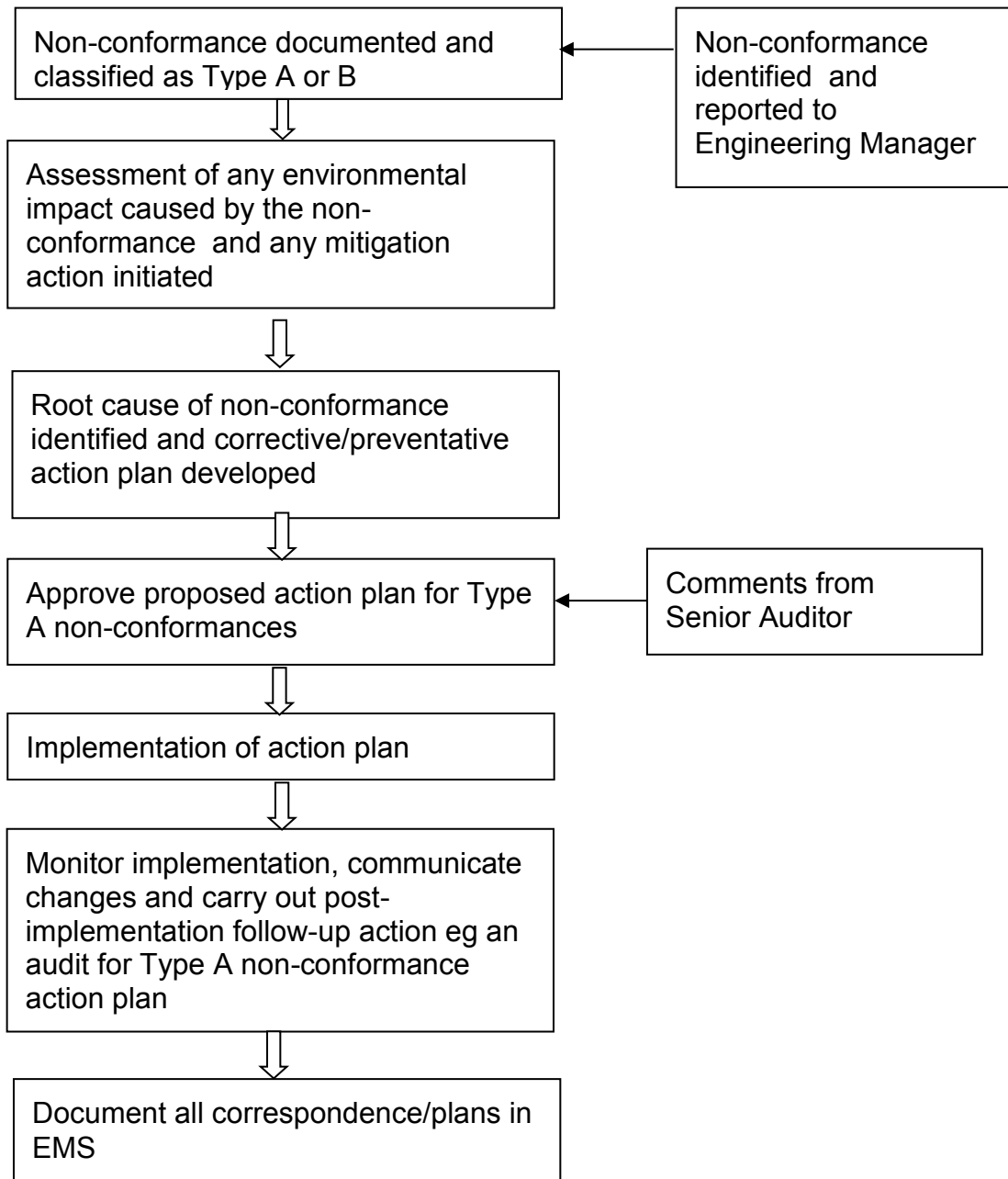
**Type B** (Priority 2 & 3)- the EMS element(s) is in theory correct but is not being implemented correctly, eg procedure compliant but is not being followed in practice. System non-conformances of Type A will normally be identified by an EMS auditor during an official audit. Non conformances of Type B may be identified by any individual involved in the day to day operation of the EMS.

It is the responsibility of the Property and Contracts Manager to receive and document reports of non-conformance or potential non-conformance which must be in writing (electronic or otherwise). On receipt of such a report, the Property and Contracts Manager will:

- a) Record the observation detailing; the date, the observer, a description of the non-conformance and any suggested solutions
- b) Assess any environmental impact that may have been caused by the non-conformance and arrange for mitigating action when needed. The emergency response procedure must be used when appropriate.
- c) Liaise with relevant staff to identify the root cause of non-conformance and to develop corrective/preventative measures through an action plan for corrective actions. The action plan should consider:
  - i) Any immediate remedial action taken.
  - ii) What the identified root cause of the non-conformance is.
  - iii) What longer term corrective/preventative measures are to be taken.
  - iv) Any changes to procedures or documentation resulting from the measures.
  - v) Defining who is responsible for implementing the action plan.
- d) Ensure that implementation of the action plan is carried out by the designated individual(s). In the case of Type A non-conformances, the Environmental Policy Group must first approve the action plan prior to implementation. The action plan must also be copied to an EMS auditor for comment.
- e) Communicate any changes in procedures to relevant staff.
- f) Decide the extent of follow up action required once the action plan has been implemented. Changes as a result of Type A non-conformances will require a specific follow up audit to check compliance. Changes as a result of Type B non-conformances can be checked through the following annual EMS audit programme.
- g) Document all correspondence/plans/amendments in the EMS.

There were 12 Type B non-conformances resulting from the 2012 audit  
Audits to be carried out every two years, next audit due 2014.

**11.4 Flow Chart - Non-Conformance, Corrective and Preventative Actions Procedure**



## **12. EMS Management Review**

### **12.1 Setting the agenda for a Management Review of the EMS**

In order to ensure management commitment and direction to improvements in our environmental performance, we recognise the need to hold an annual EMS Management Review. This will take the form of a review meeting of the Environmental Policy Group, and will assess the continuing suitability, adequacy and effectiveness of the entire EMS in achieving the aim of continual environmental improvement. The review will be reported to Management Team. The review will include:

- Assessments of internal and accreditation audit reports and the implementation of their findings
- The extent to which objectives and target have been met
- An evaluation of the suitability of the environmental policy and the effectiveness of the EMS in the following areas:
  - a) changes in applicable legal requirements and other requirements to which the organisation subscribes
  - b) changes in the products and services of our third parties
  - c) advances in science and technology with regards to our product
  - d) lessons learnt from environmental incidents
  - e) market needs
  - f) communication from external interested parties; including complaints

### **12.2 Outputs from the EMS Management Review**

- a) Those involved in the EMS Management Review will make a decision on the continued suitability, adequacy and effectiveness of the EMS in achieving the aim of continual improvement. Performance against our objectives and targets will also be documented and amended as required. Any recommendations for change will be listed in a document, which will be retained by the Property and Contracts Manager.
- b) Management Team will be responsible for implementing any changes to human or financial resources to meet the changes.
- c) The Property and Contracts Manager will be responsible for ensuring implementation of any recommended changes which will be carried out in the first six months following the review and in consultation with any affected staff.
- d) EMS Review documentation will be retained within the EMS in accordance with the CBEN Gold Award Specification standard.

### 12.3 Flow Chart - EMS Management Review Procedure

