

# ENVIRONMENTAL POLICY

Document Review					
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# Environmental Policy Statement

**'Every day we strive to be the leading and preferred multi-disciplined construction company in the North of England'** – taken from Howard Civil Engineering 20/20 Vision launch 2018.

Howard Civil Engineering Ltd is a medium sized family owned company that delivers complex highway improvements, infrastructure, reinforced concrete frames and other heavy civil engineering structures. Other sectors of the business focus on groundworks and roads and sewers contracts for developers and house builders, both direct and as a sub-contractor. However, the ethos and values driven throughout the company remains the same.

We deliver on our promises and commitment to all stakeholders; as an absolute minimum.

Howard Civil Engineering operates a ISO:14001 2015 Environmental Management System specific to our four main sectors, RC Structures, Highway improvements and Infrastructure, Groundworks and Roads and Sewer work.

## Materials, Plant and Equipment

- We will select materials, plant and equipment that have due regard to minimising energy use in respect of relevant usage, energy, efficient plant and fuel sources.
- We will promote the use of the least environmentally damaging material having regard to the production aspects, life expectancy and re-cycling potential.
- We will promote such materials and processes that comply with the environmental standards set by the relevant statutory bodies.
- We will promote the non-use of any plant or equipment that contains or gives rise to ozone damaging chemicals.
- We will appoint only Contractors and Suppliers whose Policy on Environmental Matters is equal to our own and who promote high standards in this area.
- We will promote the non-use of materials made from processes involving the use of CFC's.

## Recycling & Waste Management

- We will encourage the reduction of waste and encourage the re-cycling of materials on our Sites.
- We will ensure that all waste generated is handled and disposed of by registered and responsible Contractors using only suitable Registered Sites.
- We will separate waste produced into appropriate skips for disposal at appropriate certified waste handing centres.
- We will ensure that all our Contractors share our Policy on the Handling of Waste and Recyclable Materials in order to reduce waste and to ensure the safe and responsible disposal of residual wastes, in particular such wastes classified as hazardous.
- We use energy and raw materials efficiently in our own operations and in our advice to clients, aiming to minimise consumption of resources and production of waste, which will be recovered, recycled and re-used where feasible.

## Energy Management

- We will require our Employees to minimise the impact of their activities on the Environment and in particular by their control over noise, vibration, dust and the disposal of waste products.
- We will not employ Contractors or Suppliers who do not adhere to good environmental procedures and controls.
- We assess, monitor and review the environmental performance of sub-contractors against our vigorous internal standards closely controlling and supervising them to ensure minimum environmental risk.
- We seek to involve, understand and promptly respond to the environmental concerns of communities local to our projects and sites, planning to avoid or minimise potential nuisance issues.
- We ensure compliance with our policy through a process of audit and review.
- Improve the environmental efficiency of our transport and travel.

## Energy Efficiency and Waste Minimisation

- We monitor and seek to reduce energy usage in our office operations.
- We specify and purchase office equipment and consumables with minimum environmental impact in production and operation and maximum recyclability.
- We monitor and control the environmental impact of our vehicle fleet through appropriate vehicle specification.
- We advise clients on effective energy management and waste minimisation strategies.

## Community Involvement

- We engage communities at an early stage to ensure their concerns are addressed.
- We ensure communities potentially affected by our projects are fully informed as to the potential impacts prior to work commencing and for the duration of the project.
- We will respond rapidly to any environmental concerns raised by local residents.

## Compliance, Audit and Review

- Actively prevent pollution to land, air and water
- Identify and manage environmental risks and hazards
- We monitor and maintain records of our environmental performance.
- We check compliance through a programme of internal audits.
- We review performance to identify and address weakness so as continual improvement in environmental performance can be achieved.
- Provide suitable training to enable employees to deal with their specific areas of environmental control

Signed:



Position: Managing Director

Date: 4<sup>th</sup> January 2022

## ORGANISATION

This part of the document describes the organisation for effectively managing the Environmental Policy.

All employees are therefore responsible, to the best of their ability, for ensuring that the requirements of this document are implemented.

The key duty holders assigned specific duties within this document are as follows:

- Director
- Health, Safety, Quality and Environmental Manager
- Commercial Manager/Estimator
- Contract and Site Managers
- Supervisor
- Employees/Operatives
- Sub-Contractors

An Organisation Chart is also included to demonstrate the structure of reporting.

## MANAGING DIRECTOR'S DUTIES

The Managing Director is ultimately responsible for the Implementation of The Environmental Policy. He has overall responsibility for maintaining an organisation that ensures that all requirements of the policy and associated Statutory obligations are met by all employees and visitors/contractors to all sites or other premises under the control of the Company.

Special responsibilities include:

1. Ensure there is an effective Environmental Policy.
2. Periodically appraise the effectiveness of the policy and ensure any necessary changes are made.
3. To approve, personally sign and date, to take ownership of the company Environmental Policy and ensure that there are procedures in place for the statement to be adhered to.
4. Setting the targets and objectives that Howard Civil Engineering Ltd will work towards.
5. Ensuring that the conditions and requirements of the Environmental Policy are understood and implemented in the respective area or section of control
6. Ensuring that all necessary liability is covered by insurance and advising the extents to which risks are acceptable;
7. Ensuring that adequate financial resources are made available to relevant departments to ensure sufficient resources to achieve the objectives as set out in the Environmental Plan
8. Set an example, including considering the Environmental impacts of the offices, adhering to the hierarchy of control measures.
9. Review the HSQE Manager's Reports

## HEALTH, SAFETY, ENVIRONMENTAL AND QUALITY (HSQE) MANAGER'S DUTIES

1. Keep up to date with Environmental legislation, standards and good practice.
2. Ensuring that the conditions and requirements of the Environmental Policy are understood and implemented in the respective area or section of control
3. Set an example, including considering the Environmental impacts of the offices, adhering to the hierarchy of control measures.
4. Assess training needs for the division and arrange for all employees under his control to have suitable safety training on an ongoing basis
5. Resourcing and investigating all Environmental related accidents, including any complaints directed at Howard Civil Engineering
6. Monitoring and updating any information received from internal and external sources
7. Co-ordinating all activities/training/policy related to spillages, dusts, noise and related environmental procedures
8. Ensure that site activities under the company's control are subject to formal risk assessments/method statements etc.
9. Implement arrangements with sub-contractors and other contractors on site to review any confusion about areas of responsibility.
10. Promote the continuous improvement of environmental performance.
11. To notify the Managing Director of all accidents as they occur
12. To ensure that all defects as noted by the Director are rectified immediately.
13. Co-operate with the Director and act on his recommendations.
14. Give advice to management as requested on:
  - Legal requirements affecting the environment.
  - Prevention of incident on site.
  - Provision, selection and use of protective clothing and equipment.
  - New working methods, equipment or materials which could reduce risks.
  - Proposed changes in legislation.
  - Potential hazards on new sites before work starts, environmental factors affecting the selection of plant and equipment, contractors and so on, where requested.
  - Specialist services required in relation to substances hazardous to health, noise, asbestos removal etc., where requested.
15. Carry out inspections of workplaces on an as requested basis to determine whether work is being carried out in accordance with company policy, procedures and the relevant statutory provisions. Provide an inspection report to the Site Supervisor and send a copy of the report to the Director and Contracts Manager for action as required.

16. Assist management in notifying the Environmental Agency of environmental incidents in accordance with company policy.
17. Check that necessary emergency environmental incident equipment is available at all workplaces.
18. Check that necessary statutory literature is on display at workplaces.
19. Endeavour to establish at all levels within the company an understanding that compliance with the regulations and prevention of environmental incident is a profitable and essential integral part of business.
20. Carry out annual environmental audit and provide written report.
21. Set a personal example.

## COMMERICAL MANAGER'S/ESTIMATOR'S DUTIES

1. Be familiar with and demonstrate a commitment to the implementation of this policy.
2. Ensure all relevant information is sent to the tendering subcontractor(s) on known/suspected environmental hazards in order that the subcontractor(s) can make appropriate provision for safe working conditions.
3. In conjunction with the Director and Contracts Manager ensure that the competence and resources of potential subcontractors are adequate.
4. Seek advice from the Health Safety and Environmental Manager whenever required.

## CONTRACT and SITE MANAGER'S DUTIES

Directly responsible to the Managing Director for the environmental arrangements on all areas of business under their control, and include

- 1 Implementation of the company's Environmental policy
- 2 Recognise the importance of effective management of the Policy
- 3 Ensure that any work carried out under their control is affected in accordance with all contract and regulatory requirements, including method statements and risk assessments.
- 4 Seek the advice of the HSQE Manager, when in doubt, on matters relating to Environmental matters
- 5 Liaise with the HSQE Manager at the planning stage of contracts.
- 6 Complete the Site Waste Management Plan
- 7 Ensure COSHH assessments are completed on all COSHH related substances to be used on site
- 8 Plan and maintain an orderly site
- 9 Supervise arrangements with subcontractors and possible other contractors on site to avoid confusion over areas of responsibility
- 10 Constantly look out for hazards from equipment and materials
- 11 Ensure checks on Plant and machinery either hired or owned by the company and used within contracts are carried out to ensure that they are safe and in good working order, and maintained accordingly

- 12 Investigate Environmental issues and environmental complaints immediately and report on them to the HSQE Manager as appropriate
- 13 Ensure all site personnel are fully competent and trained in the tasks to be undertaken
- 14 Will be responsible to ensure that the Environmental plan, policy, and procedures are implemented on that site.
  
- 15 Will ensure that the human and physical resources are in place for those who will be carrying out the works
- 16 Will meet regularly and feedback any success and failures of any part of the Environmental policy or Environmental Management system.
- 17 Will facilitate communication to the site workforce through induction, safe starts and regular toolbox talks.
- 18 Will identify the hazards associated with the works and put in place control procedures and will report the findings back to the HSQE Manager.
- 19 Set a personal example

## **SUPERVISOR'S DUTIES**

Are directly responsible to the relevant line managers for Environmental arrangements under their control

- 1 Be conversant with the requirements of the Site Environmental Management Plan
- 2 Carry out regular inspections of plant, equipment, tools and PPE as appropriate.
- 3 Bring to the attention of all operatives any information or new legislation which requires to be effectively implemented (toolbox talks)
- 4 Ensure that all personnel are trained in the relevant emergency procedures
- 5 Ensure that wherever an activity is deemed hazardous, and therefore subject to permit-to-work, that all appropriate records are held, and staff receive suitable instruction.
- 6 Discuss any training needs identified with the HSQE Manager.
- 7 Set a personal example

## **EMPLOYEES/OPERATIVES DUTIES**

- 1 Read and understand the Company Environmental Policy and comply with its requirements, arrangements and safety rules
- 2 Carry out the work in accordance with all relevant risk assessments
- 3 Comply with all written or verbal instructions given
- 4 Not take unnecessary risks, which could cause Environmental harm

- 5 Observe all laid down safe systems of work; permit to work; and other safety procedures concerning work activities, plant, materials and substances
- 6 Dress sensibly and safely for the work environment or occupation involved in.
- 7 Report any environmental hazard within the work area or defect in any office equipment, machinery, plant to the appropriate Supervisor or Line Manager
- 8 Always act in an orderly manner in the workplace and refrain from any form of horseplay
- 9 Will not act in a manner that could detrimentally impact on the neighbouring community
- 10 Will adhere to the site rules on personal conduct.

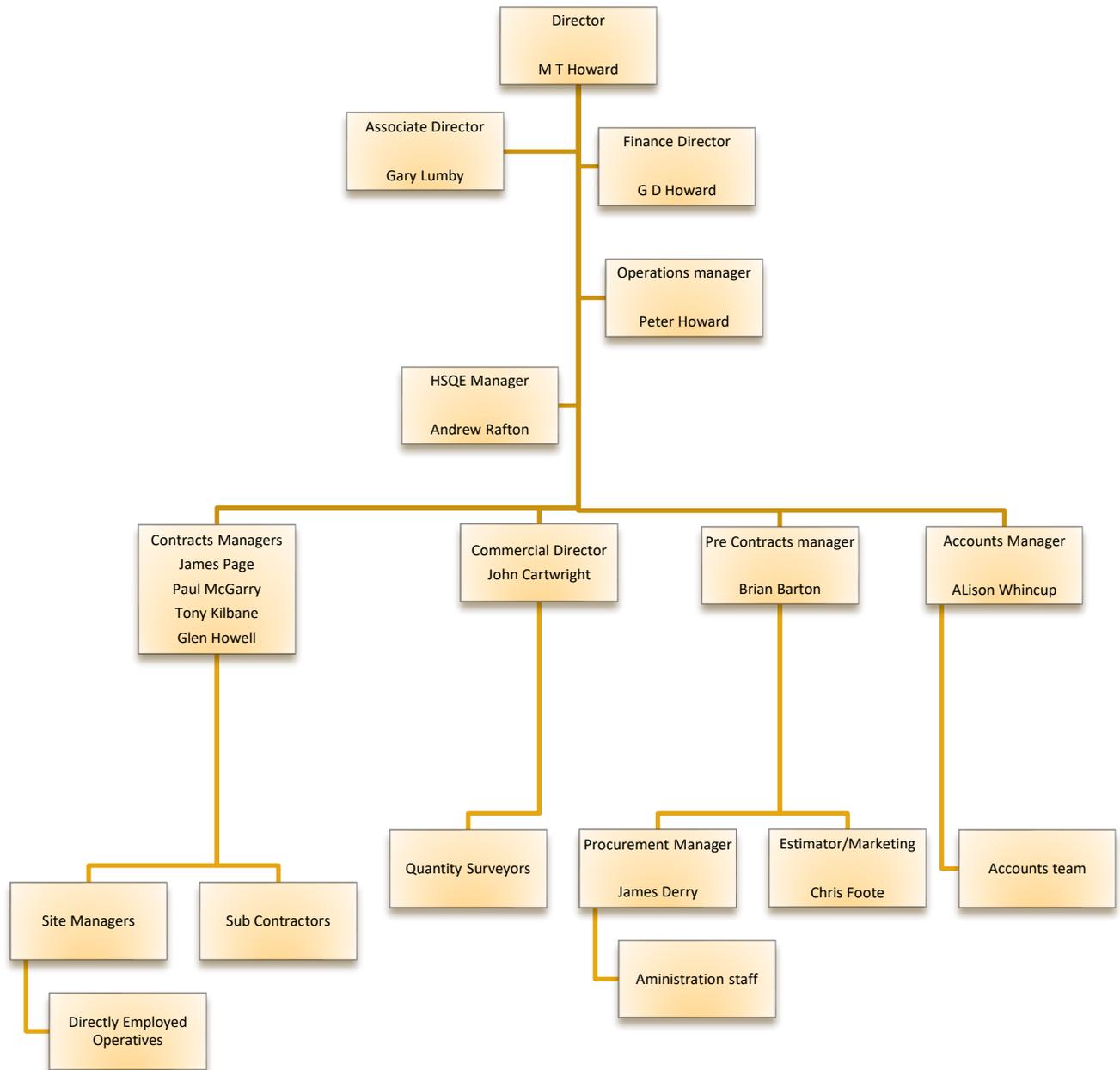
## **SUB-CONTRACTORS' DUTIES**

- 1 All sub-contractors will be expected to comply with company Environmental Policy
- 2 All work must be carried out in accordance with the relevant statutory provisions and taking into account the site-specific Environmental hazards on the site.
- 3 Assessment of risk associated with any substance, process or work activity on site which will be hazardous to the environment and must be provided to the Contract Manager before work commences. Any material or substance brought on site which has health, fire or explosion risks must be used and stored in accordance with regulations and current recommendations and that information must be provided to any other person who may be affected on site.
- 4 All plant or equipment brought on to site by sub-contractors must be safe and in good working condition, fitted with any necessary guards and safety devices and with any necessary certificates available for checking. Information and assessment on noise levels of plant, equipment or operations to be carried out by the sub-contractor must be provided to our Site manager before work commences.
- 5 Any incident likely to cause harm to the environment caused by sub-contractor's employees must be reported immediately to the Site Supervisor.
- 6 Sub-contractor's employees must comply with any environmental instructions given by the Director, Contracts Manager or Site Supervisor.
- 7 Howard Civil Engineering has appointed a HSQE Manager to inspect sites and report on health and safety and environmental matters. Sub-contractors informed of any hazards or defects noted during these inspections will be expected to take immediate action.
- 8 Suitable welfare facilities and first aid equipment in accordance with the regulations must be provided by sub-contractors for their employees unless arrangements have

been made for the sub-contractor's employees to have the use of this company's facilities.

- 9 Sub-contractors are particularly asked to note that workplaces must be kept tidy and all debris, waste materials etc., cleared as work proceeds.
- 10 Where required a detailed risk assessments/method statement will be required from sub-contractors carrying out high risk activities. The document must be agreed with our Site manager before work begins and copies made available on site so that compliance with the agreed method of work can be maintained.
- 11 Sub-contractors operating any item of plant must be in possession of a valid certificate of competent and provide a copy to the Site Supervisor prior to commencing work.
- 12 All personnel will be required to attend a site induction prior to commencing work.

## Organisational chart



## Arrangements

Howard Civil Engineering Limited understand that our contracting services offer unique opportunities for the improvement of damaged environments.

### Materials, Plant and Equipment

- We will select materials, plant and equipment that have due regard to minimising energy use in respect of relevant usage, energy, efficient plant and fuel sources.
- We will promote the use of the least environmentally damaging material having regard to the production aspects, life expectancy and re-cycling potential.
- We will promote such materials and processes that comply with the environmental standards set by the relevant statutory bodies.
- We will promote the non-use of any plant or equipment that contains or gives rise to ozone damaging chemicals.
- We will appoint only Contractors and Suppliers whose Policy on Environmental Matters is similar to our own and who promote high standards in this area.
- We will promote the non-use of materials made from processes involving the use of CFC's.

### Recycling & Waste Management

- We will encourage the reduction of waste and encourage the re-cycling of materials in the development of our Sites.
- We will ensure that all waste generated is handled and disposed of by registered and responsible Contractors using only suitable Registered Sites.
- We will on appropriate Sites and in conjunction with our Clients promote the use of hazardous waste skips.
- We will ensure that all our Contractors share our Policy on the Handling of Waste and Recyclable Materials in order to reduce waste and to ensure the safe and responsible disposal of residual wastes, in particular such wastes classified as hazardous.
- We use energy and raw materials efficiently in our own operations and in our advice to clients, aiming to minimise consumption of resources and production of waste, which will be recovered, recycled and re-used where feasible.

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- We ensure compliance with our policy through a process of audit and review.

## Energy Efficiency and Waste Minimisation

- We monitor and seek to reduce energy usage in our office operations.
- We specify and purchase office equipment and consumables with minimum environmental impact in production and operation and maximum recyclability.
- We monitor and control the environmental impact of our vehicle fleet through appropriate vehicle specification.
- We advise clients on effective energy management and waste minimisation strategies.

## Community Involvement

- We engage communities at an early stage to ensure their concerns are addressed.
- We ensure communities potentially affected by our projects are fully informed as to the potential impacts prior to work commencing and for the duration of the project.
- We will respond rapidly to any environmental concerns raised by local residents.
- Where appropriate our community liaison programme will be rolled out to keep all local residents and businesses informed of the works and how the works may affect them.

## Compliance, Audit and Review

- We monitor and maintain records of our environmental performance.
- We check compliance through a programme of internal audits.
- We review performance to identify and address weakness so as continual improvement in environmental performance can be achieved.

# Complaints Procedure

All complaints received by Howard Civil Engineering Ltd are taken very seriously and addressed as described below.

## Publicised Contact Details for Complaints:

Written complaints may be sent to  
Howard Civil Engineering Ltd  
Unit 11 Acorn Business Park  
Killingbeck Avenue  
Leeds  
LS14 6UF

or by e-mail at [reception@howardcivileng.co.uk](mailto:reception@howardcivileng.co.uk).

Verbal complaints may be made by phone to 0113 249 8569 or in person to any of Howard Civil Engineering's management staff on site or at the Head Office in Leeds

## Receiving Complaints

Complaints may arrive through channels publicised for that purpose or through any other contact details or opportunities the complainant may have.

Complaints received by telephone or in person need to be recorded.

The person who receives a phone or in person complaint should:

- Write down the facts of the complaint
- Take the complainant's name, address and telephone number
- Note down the relationship of the complainant to Howard Civil Engineering Ltd for example: client, neighbours etc.
- Tell the complainant that we have a complaints procedure
- Tell the complainant what will happen next and how long it will take
- Where appropriate, ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words.

For further guidelines about handling verbal complaints, see Appendix 1 Resolving Complaints

## Stage One

In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received by that person, they may be able to resolve it swiftly and should do so if possible and appropriate.

Whether or not the complaint has been resolved, the complaint information should be passed to the HSQE Manager within 48 hours.

On receiving the complaint, this is recorded into the complaints log. If it has not already been resolved, they delegate an appropriate person to investigate it and to take appropriate action.

If the complaint relates to a specific person, they should be informed and given a fair opportunity to respond.

Complaints should be acknowledged by the person handling the complaint within a week. The acknowledgement should say who is dealing with the complaint and when the person complaining can expect a reply. A copy of this complaints procedure should be attached.

Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

### **Stage Two**

If the complainant feels that the problem has not been satisfactorily resolved at Stage One, they can request that the complaint is reviewed at Director level. At this stage, the complaint will be passed to a Director.

The request for Directors level review should be acknowledged within a week of receiving it. The acknowledgement should say who will deal with the case and when the complainant can expect a reply.

The person who receives Stage Two complaints may investigate the facts of the case themselves or delegate a suitably senior person to do so. This may involve reviewing the paperwork of the case and speaking with the person who dealt with it with the complaint at Stage One.

If the complaint relates to a specific person, they should be informed and given a further opportunity to respond.

The person who dealt with the original complaint at Stage One should be kept informed of what is happening.

Ideally complainants should receive a definitive reply within two weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

The decision taken at this stage is final, unless the Directors decides it is appropriate to seek external assistance with resolution.

### **Variation of the Complaints Procedure**

The Directors may vary the procedure for good reason. This may be necessary to avoid a conflict of interest.

### **Monitoring and Learning from Complaints**

Complaints are reviewed annually to identify any trends which may indicate a need to take further action.

## Appendix 1 - Practical Guidance for Handling Verbal Complaints

- Remain calm and respectful throughout the conversation
- Listen - allow the person to talk about the complaint in their own words.
- Sometimes a person just wants to "let off steam"
- Don't debate the facts in the first instance, especially if the person is angry
- Show an interest in what is being said
- Obtain details about the complaint before any personal details
- Ask for clarification wherever necessary
- Show that you have understood the complaint by reflecting back what you have noted down
- Acknowledge the person's feelings (even if you feel that they are being unreasonable) - you can do this without making a comment on the complaint itself or making any admission of fault on behalf of the organisation e.g. "I understand that this situation is frustrating for you"
- If you feel that an apology is deserved for something that was the responsibility of your organisation, then apologise
- Ask the person what they would like done to resolve the issue
- Be clear about what you can do, how long it will take and what it will involve.
- Don't promise things you can't deliver
- Give clear and valid reasons why requests cannot be met
- Make sure that the person understands what they have been told
- Wherever appropriate, inform the person about the available avenues of review or appeal