

## Environmental manual

### **Contents**

1	I	ntrodu	ction to Environmental Management System	1
2	A	Amend	lment Record	1
3	(	Compa	any Background	2
4	N	Manag	ement System Requirements	2
	4.1	Gene	eral Requirements	2
	4.2	Envii	ronmental Policy	2
	4.3	Plani	ning	2
	4.3	3.1	Environmental Aspects	2
	4.3	3.2	Legal & Other Requirements	2
	4.3	3.3	Objectives, Targets and Program(s)	2
	4.4	Imple	ementation & Operation	3
	4.4	4.1	Resources, Roles, Responsibility & Authority	3
		4.2	Competence, Training & Awareness	
		4.3	Communication	
		4.4	Documentation	
		4.5	Control of Documents	
		4.6	Operational Control	
	4.4	4.7	Emergency Preparedness & Response	6
	4.5	Chec	cking	6
	4.5	5.1	Monitoring & Measurement	6
	4.5	5.2	Evaluation of Compliance	6
	4.5	5.3	Non-Conformity, Corrective & Preventive Action	
	4.5	5.4	Control of Records	
	4.5	5.5	Internal Audit	8
	4.6	Mana	agement Review	8

### 1 Introduction to Environmental Management System

This Policy Manual has been designed to satisfy Clause 4 of the ISO 14001:2004 Specifications with regard to Environmental Management Systems.

It provides the overview of the Management Systems relevant to Deans Blinds and Awnings UK Ltd's activities along with the responsibilities incumbent upon members of staff for ensuring continuing system compliance.

Specific management and operational procedures that address issues of compliance with current Environmental Legislation and industry best practice are contained within the <a href="Procedures">Procedures</a> and <a href="Environmental Working Practices">Environmental Working Practices</a> that operate in support of this Policy Manual.

Environmental Manual Issue Level: 1 Issue Date: June 2018

Crownford db

All references reflect the clause of the ISO 14001:2004 Specification applicable to it.

^	A		4	<b>D</b> -		
7	Ame	nar	nent	· Ke	מסמי	М

Please refer to the <u>Amendment Register</u> for details of all documentation changes.

Environmental Manual Issue Level: 1 Issue Date: June 2018 Crownford Page 2 of 8
© Crownford 2013
ALL PRINTED COPIES ARE UNCONTROLLED

### 3 Company Background

Deans Blinds and Awnings Limited, manufacture and supply Blinds and awnings. Established in 1894, we operate from our 12,000 square foot factory, in Wandsworth London, employing over 20 People

### 4 Management System Requirements

### 4.1 General Requirements

Deans Blinds and Awnings UK Ltd has established, documented, implemented and maintain an Environmental Management System in accordance with the requirements of the ISO 14001:2004 standard.

The scope of our Management System covers "The manufacture, supply and installation of external and internal Blinds and Awnings"

# 4.2 Environmental Policy

Top Management have defined and documented Deans Blinds and Awnings UK Ltd's policy in relation to Environmental management and communicated this throughout the organisation. See:-

• Environmental Policy Statement (EP).

### 4.3 Planning

### 4.3.1 Environmental Aspects

The <u>Impact Identification</u>, <u>Assessment & Control Procedure (EP01)</u> has been established for the:-

- · identification of environmental aspects;
- · assessment of the environmental impact posed; and
- determination of the required controls to remove / reduce these impacts.

### 4.3.2 Legal & Other Requirements

Many of the organisation's operations are subject to legislative demands for which guidance is available that assists in complying with such legislation. There are also standards which are not legislative requirements to which Deans Blinds and Awnings UK Ltd subscribe, for example, the ISO 14001:2004 standard.

We have produced a <u>Legal & Compliance Register</u> which contains hyperlinks to the relevant legislation and associated guidance notes. In order to ensure that that the information contained within remains current, we operate the <u>Maintenance of Legal & Compliance Register Procedure (EP02)</u>.

# 4.3.3 Objectives, Targets and Programme(s)

Deans Blinds and Awnings UK Ltd have established the <u>Setting & Review of Objectives & Targets Procedure (EP03)</u> which outlines how our Environmental objectives are set and reviewed. Our objectives are documented using the format set with the <u>Continual Improvement Objectives Form (EF05)</u>.

### 4.4 Implementation & Operation

### 4.4.1 Resources, Roles, Responsibility & Authority

Notwithstanding the fact that all members of staff have a responsibility for protection of the environment, specific responsibilities have been assigned to certain key individuals within Deans Blinds and Awnings UK Ltd for ensuring that the Management System operates effectively.

Deans Blinds and Awnings UK Ltd's <u>Organisational Chart</u> outlines the structure for environmental communication and the maintenance and development of the Management System. Specific responsibilities and authorities are contained within various procedures but main system responsibilities have been assigned as below:-

### Managing Director - Michael Seary

- Has overall responsibility for ensuring that the Environmental Plan is formulated, reviewed annually, and provided with sufficient resources in terms of financial, human, time and materials to ensure that it can succeed.
- Attends Management Review Meetings and approves Deans Blinds and Awnings UK Ltd's Environmental Objectives.
- Approves our Environmental Policy and appoints a Management Representative to implement the Management System in line with the Policy.

### **Environmental Manager**

Deans Blinds and Awnings UK Ltd have appointed an individual, Gareth Bowen, with specific responsibility for the day to day management of Environmental matters. As part of their role as Environmental Manager they are responsible for:-

- Ensuring that training is sourced or provided internally to satisfy those training needs identified by Departmental Managers.
- Ensuring the success of the Environmental Objectives through their regular review, reporting any variations from the original target dates to the Managing Director.
- Ensuring that re-active objectives are identified, documented and monitored through the use of Remedial Action Plan Forms (EF02).
- Ensuring that the impact assessment process is completed and reviewed as scheduled or upon any change to normal activities.
- Ensuring that any non-routine work is effectively controlled through the inspection of method statements and risk assessments where appropriate, or by other measures that are from time to time implemented.
- Ensuring the <u>Control of Documents Procedure (EP06)</u> and <u>Control of Records Procedure</u> (EP17) used within Deans Blinds and Awnings UK Ltd are followed at all times.

#### Crownford

Deans Blinds and Awnings UK Ltd have appointed a Consultancy, Crownford, to assist in the development of our Environmental Management System. Elements of the Environmental Management System are outsourced where deemed necessary or beneficial to the company. As part of our agreement with Crownford they are responsible for:-

Environmental Manual Issue Level: 1 Issue Date: June 2018

- The regular audit and review of the Management System and the identification of any non-conformances to the Environmental Manager.
- Ensuring that the elements of the impact assessment processes for which they hold direct responsibility are completed in a timely fashion and any issues arising entered onto Remedial Action Plan Forms (EF02).
- Developing and Maintaining the <u>Legal & Compliance Register</u> and advising management on any changes that affect the information contained therein.
- · Advising on all other relevant aspects of Environmental management.

### **Managers**

All Managers must:-

- Ensure that all staff under their control are fully aware of and understand their requirements and responsibilities under Deans Blinds and Awnings UK Ltd's Environmental Policy.
- Ensure that all employees under their control are trained and competent to carry out their work in a safe and correct manner and are fully aware of known risks to the environment.
- Identifying any training needs within their department to the Environmental Manager.
- Ensure that all precautions deemed necessary are in place at all times. E.g. spill kits etc.
- Ensure that any instructions given to employees take full account of the employees' individual capabilities and their Health & Safety.
- Ensure that all employees under their control are aware of the procedures to be followed in the event of fire / emergency, accident or spillage.
- Ensure that adequate supervision is provided / maintained at all times, particularly where young or inexperienced workers are being employed.
- Ensure that individuals clean as they go and good housekeeping is maintained at all times.
- Appraise, assess, discuss and action Environmental matters with relevant personnel.
- Ensure that any potential environmentally damaging situations are immediately rectified or, if this is beyond their scope of responsibility, that the matter is reported immediately to the Environmental Manager.
- Ensure that employees for whom they are responsible immediately report any accident, incident or near-miss occurring whilst at work.
- Ensure that their areas of responsibility are frequently examined to identify any environmental issues and implement remedial action as necessary.
- Undertake regular inspections / checks and ensure that all necessary preventive and / or corrective measures are implemented and maintained.
- Ensure effective liaison with all departments on the operation and development of the Environmental Management System within Deans Blinds and Awnings UK Ltd.

# **Employees' Responsibilities**

In accordance with Deans Blinds and Awnings UK Ltd's Environmental Policy, all employees have an individual responsibility and duty for the following:-

- Making themselves familiar with, and conforming with, Deans Blinds and Awnings UK Ltd's Environmental Policy at all times.
- · Conforming to Procedures and Working Practices at all times.
- Making suggestions to improve Environmental Management within Deans Blinds and Awnings UK Ltd to the Environmental Manager.
- Reporting without delay any environmental incident, such as chemical spillage during the course of their work directly to their Manager.
- Ensuring that a good level of housekeeping at and around their work area is maintained at all times.
- Taking reasonable care of themselves and other persons who may be affected by their acts or omissions whilst at work.
- Disposing of wastes correctly to the receptacles provided.
- Minimising energy usage and wastage wherever possible and applying the principles of the Three R's i.e. Reduce, Recycle, Reuse.

### 4.4.2 Competence, Training & Awareness

Deans Blinds and Awnings UK Ltd have established the <u>Competence, Training & Awareness Procedure (EP04)</u> to ensure that all staff are trained and competent to undertake the tasks expected of them. Training provided includes induction, job / task specific and refresher training.

The Environmental Manager is responsible for identifying training needs and for ensuring that training is sourced or provided internally to satisfy the training needs.

We maintain Training & Competency Matrixes to allow quick and easy review of competencies using the format set out within the <u>Training & Competency Matrix Form (EF06)</u>.

#### 4.4.3 Communication

We have established the <u>Communication</u>, <u>Participation & Consultation Procedure (EP05)</u> to clarify the methods we use for both internal and external communication and the participation and involvement of staff in the development of our Environmental Management System.

Environmental complaints will be handled as per the <u>Environmental Complaints Procedure (EP08)</u>.

### 4.4.4 Documentation

Our Environmental Management System meets the requirements of ISO 14001:2004 through the documentation contained within this Policy Manual, our <u>Environmental Policy</u>, <u>Procedures</u> and <u>Environmental Working Practices</u> along with our current Objectives and records of the planning, operation and control of our processes.

### 4.4.5 Control of Documents

Environmental Management System documents are controlled as per the <u>Control of Documents Procedure (EP06)</u>.

Environmental Manual Issue Level: 1 Issue Date: June 2018

Crownford Page 6 of 8
© Crownford 2013
ALL PRINTED COPIES ARE UNCONTROLLED

### 4.4.6 Operational Control

Documentation has been produced that outlines the methods utilised to maintain control over our operations. Our <u>Environmental Working Practices</u> describe how to undertake tasks in the correct and safe manner where they carry a significant risk to the environment.

The <u>Procedures</u> listed below have also been developed to ensure control over the following areas:-

- Environmental Inspections / Checks (EP07);
- Contractor / Visitor Control (EP09);
- Contractor / Visitor Rules (EP10);
- Equipment Maintenance (EP11);
- Purchase & Trial of Substances (EP12);
- Waste Management (EP13); and
- Data Monitoring (EP14).

### 4.4.7 Emergency Preparedness & Response

The nature of the work undertaken at Deans Blinds and Awnings UK Ltd's site is such that protracted emergency plans are not necessary and the provisions of COMAH (Control of Major Accident Hazards) do not apply.

Accordingly the <u>Emergency Preparedness & Response Procedure (EP15)</u> has been developed to address the potential emergency situations that could arise from breakdowns in incident prevention or environmental controls.

### 4.5 Checking

### 4.5.1 Monitoring & Measurement

Deans Blinds and Awnings UK Ltd's Environmental Management System allows for both proactive and re-active monitoring. Pro-active monitoring is achieved by way of a number of performance review mechanisms, e.g.:-

- Impact Assessment;
- Workplace Environmental Inspections;
- Periodic Statutory Inspections (e.g. Thorough Examination of Compressors etc.); and
- · Compliance with the various action plans.

Re-active monitoring is undertaken following serious incidents or, reports of ill-health.

The Environmental Manager and the Consultant review both aspects of monitoring on a regular basis.

There is no measurement equipment used by Deans Blinds and Awnings UK Ltd that affects the performance of the Environmental Management System.

Measurement of performance therefore focuses on an on-going evaluation of achieving the action plans within the time-scales agreed and from review of the relevant inspection documentation.

### 4.5.2 Evaluation of Compliance

The <u>Maintenance of Legal & Compliance Register Procedure (EP02)</u> has been developed in order to determine how Deans Blinds and Awnings UK Ltd evaluates its compliance with applicable legal requirements. The compliance review is documented on the <u>Legal &</u>

Environmental Manual Issue Level: 1 Issue Date: June 2018

Crownford the Page 7 of 8
© Crownford 2013
ALL PRINTED COPIES ARE UNCONTROLLED

<u>Compliance Register</u> itself. Any other (non-legislative) requirements to which Deans Blinds and Awnings UK Ltd subscribe will be reviewed for compliance at the same time as the legislative review is carried out.

Environmental Manual Issue Level: 1 Issue Date: June 2018 Crownford Page 8 of 8
© Crownford 2013
ALL PRINTED COPIES ARE UNCONTROLLED

### 4.5.3 Non-Conformity, Corrective & Preventive Action

### Incident and Non-conformance Investigations

We have established the <u>Incident Reporting & Investigation Procedure (EP16)</u> which details the process followed in the event of variation from Policy and uncontrolled activities. This procedure ensures that all instances are investigated and, where appropriate, remedial action planned and implemented.

Incidents and non-conformances are divided into three main categories:-

- Major Environmental Incidents always investigated and, where appropriate, reported to the enforcing authorities;
- Minor Environmental Incidents only investigated where sufficiently serious to warrant investigation; and
- Substantial variations to working practices resulting in potentially environmentally damaging occurrences arising (always investigated).

All such investigations are undertaken by the Consultant and any remedial action arising is entered onto a <u>Remedial Action Plan Form (EF02)</u> for implementation / monitoring by the Environmental Manager.

### **Corrective and Preventive Action**

The need for corrective action is identified from inspection documentation, incident reports and internal system audits. Where remedial action is required, this action is divided into specific measurable tasks and entered onto a Remedial Action Plan Form (EF02).

Preventive actions are identified from the Impact Assessment process and are also implemented via the Remedial Action Plan process.

In both instances, on-going monitoring assesses the suitability of the remedial actions taken and the successes of remedial activities are reviewed at Management Review Meetings and Environmental Committee Meetings.

#### 4.5.4 Control of Records

Environmental Management System records are controlled as per the <u>Control of Records</u> Procedure (EP17).

#### 4.5.5 Internal Audit

All internal audits of the Environmental Management System are undertaken as per the Internal Audit Procedure (EP18).

An audit schedule is arranged each year using the template set out in the <a href="Internal Audit Schedule Form (EF14">Internal Audit Schedule Form (EF14)</a>. This schedule ensures that every aspect is audited at least once each year, though the frequency may increase where an audit result or other indicator shows that the aspect should be audited more frequently. Results of internal audits are reviewed at Management Review Meetings.

### 4.6 Management Review

Management Review Meetings of the Environmental Management System are undertaken on an annual basis. The <u>Management Review Procedure (EP19)</u> sets out the persons required to attend the meeting, agenda and process for follow-up actions.

Environmental Manual Issue Level: 1 Issue Date: June 2018