Environmental Management System

Environmental Management Handbook

EMP 02

| Prepared by	Issue	Date	Page 1 of **18**
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Purpose

This document provides information regarding Warwickshire County Council's (WCC) environmental management system (EMS). It gives an overview of the EMS and demonstrates how it relates to and fulfils the requirements of ISO 14001:2015.

Introduction

Warwickshire County Council (WCC) is responsible for providing a wide range of services to over half a million residents. It works with other public, private and voluntary bodies to make Warwickshire a better place for people to live and work. Delivery of these services requires the execution of many and various activities which, if not properly controlled, have the potential to impact adversely on the environment. In order to ensure that its environmental risks are minimised and that opportunities for environmental improvements are identified WCC has implemented and maintains an environmental management system (EMS) which is independently certified to the ISO 14001 standard.

ISO 14001:2015 is an international standard that provides a framework for implementing a system to manage environmental risk and progress environmental improvements. High level elements of the standard are shown in fig 1 below.
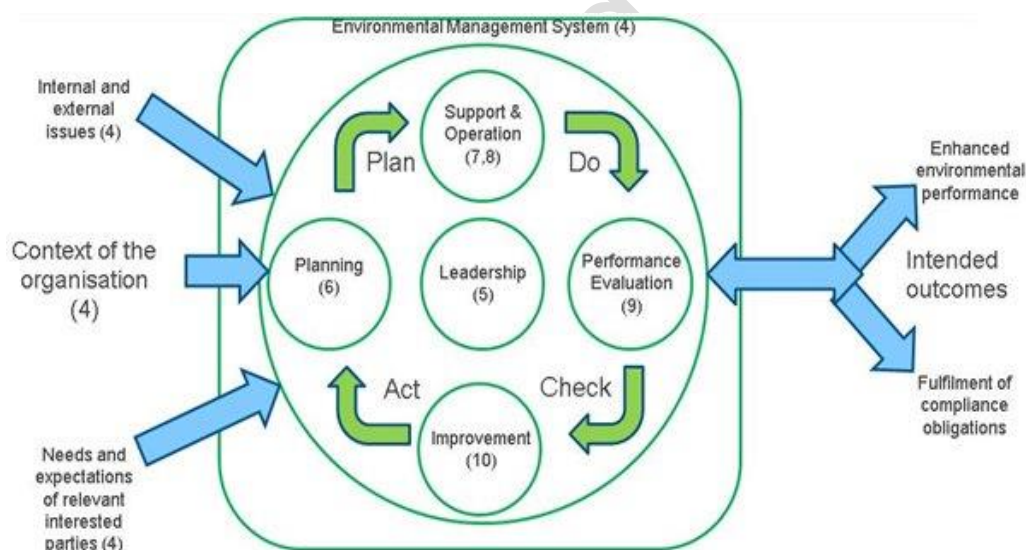
Fig 1 – ISO 14001:2015 – High Level Elements.

Context of the organisation

Understanding the organisation and its context

The county of Warwickshire covers approximately 763 square miles (1,979 square kilometres) comprising both rural and industrial areas and supporting a growing population of around 550,000 people. Warwickshire County Council (WCC) is the Upper Tier Authority for the county and works closely with District, Borough, Town and Parish Councils to support the residents of Warwickshire.

WCC has 57 councillors representing Warwickshire's electoral divisions. Councillors are elected for a four year term with core decisions determined via a Cabinet comprising nine elected members.

WCC's Core Purpose is to 'Make Warwickshire the best it can be' [1]

This is supported by two outcomes:

- Warwickshire's communities and individuals are supported to be safe, healthy and independent
- Warwickshire's economy is vibrant and supported by the right jobs, training, skills and infrastructure

Internally this is facilitated by Warwickshire's Behaviours:-

Like other local authorities throughout the UK WCC faces extreme financial challenges. Reduction in grants from Central Government along with demographic pressures mean that the organisation must identify savings amounting to around £67,000,000 by 2020.[2]

A key pressure on the organisation is the need to balance economic growth with the associated impacts on the environment. This includes pressure to build on greenbelt land, increased risk of flooding and the demand on transport infrastructure.

These strategic pressures and associated risks are explored in **EMP 04**

Structure of the organisation
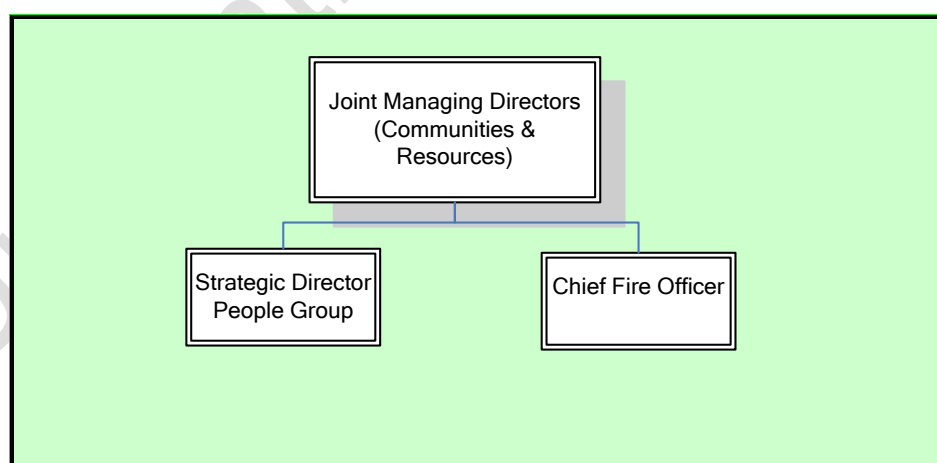
Fig 2 – High Level Organogram

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[1] WCC One Organisational Plan 2020 – Warwickshire Behaviours
[2] WCC One Organisational Plan 2020

Warwickshire County Council comprises 4 service groups which are jointly managed by 2 Managing Directors. The Director of Communities Group represents external services and the Director of Resources Group represents internal services. Service). They are supported by The Chief Fire Officer and the Strategic Director of the People Group.

People Group - Supporting people, especially the most vulnerable and disadvantaged and to help them to access every opportunity and to enjoy, achieve and live independently. People Group provides Social Care, Learning, and Achievement and Health related services for all ages.

Resources Group - The many and varied services within the Resources Group provide services internally to other areas of the council, externally to our partners and communities, and on the front line directly to our customers. These include Customer Service, Finance, HR & Organisational Development, ICT, Law & Governance, Property Services, and Performance - all key service areas which ensure the smooth running of the County Council,

Fire and Rescue - Warwickshire Fire and Rescue are responsible and dedicated to the delivery of Community Fire Safety advice, protecting the community and making Warwickshire a safer place to live, responding to emergencies when the public needs us most.

Community Group – Community Group aims to promote sustainable development and ensure that Warwickshire is the best place to live and work – now and in the future. Services should make economic, social and environmental improvements for the benefit of Warwickshire's residents.

Understanding the needs and expectations of interested parties

As a local authority having numerous responsibilities and undertaking many services WCC has many interested parties. A good deal of these will have expectations regarding WCC's environmental performance and operations.

Strategic interested parties, along with their relationship with WCC and the needs and expectations regarding WCC's EMS/environmental performance have been identified through examining WCC's core organisational functions and associated policies and business plans, using a PESTLE approach.[3] Information regarding strategic interested parties are documented in **EMP 03.** This includes any associated compliance obligations.

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[3] PESTLE - Political, Economic, Social, Technology, Legal, Environment

At an operational level interested parties and their expectations regarding WCCs EMS/environmental performance have been identified through the assessment of WCC's environmental aspects – Refer to Environmental Aspects on page 9.

Determining the scope of the environmental management system

The certified, high-level documented scope of the EMS is:-

> *"The services and activities delivered by Warwickshire County Council in relation to the built and natural resources of Warwickshire"*

In detail the scope of the EMS has been determined taking into account the boundaries of WCC's physical estate, services delivered, compliance obligations and the needs and expectations of interested parties. It also reflects where controlling/influencing factors.

The scope of the EMS is reviewed annually, or in the event of significant changes to the organisation that impact on the EMS. The scope of the EMS is available to interested parties upon request.

The scope of the EMS is detailed in **EMP 05**

Environmental management system

WCC has established and implemented an independently certified environmental management system in line with the requirements of the international standard ISO 14001.

The intended outcome of WCC's EMS (as detailed in the commitments of the Environmental Management policy) is to progress improved environmental performance through:-

- Compliance with environmental legal/contractual obligations;
- Effective management of environmental risk;
- Efficient and sustainable use of resources;
- Environmental protection and management of the authority's estate;
- Resilience in the event of adverse environmental conditions; and
- Having relevant environmental skills, knowledge and awareness in place.

The following diagram, shown in *Fig 3,* shows the key relationships and support mechanisms for the EMS. This includes how the various clauses of ISO 14001:2015 fit into this framework.
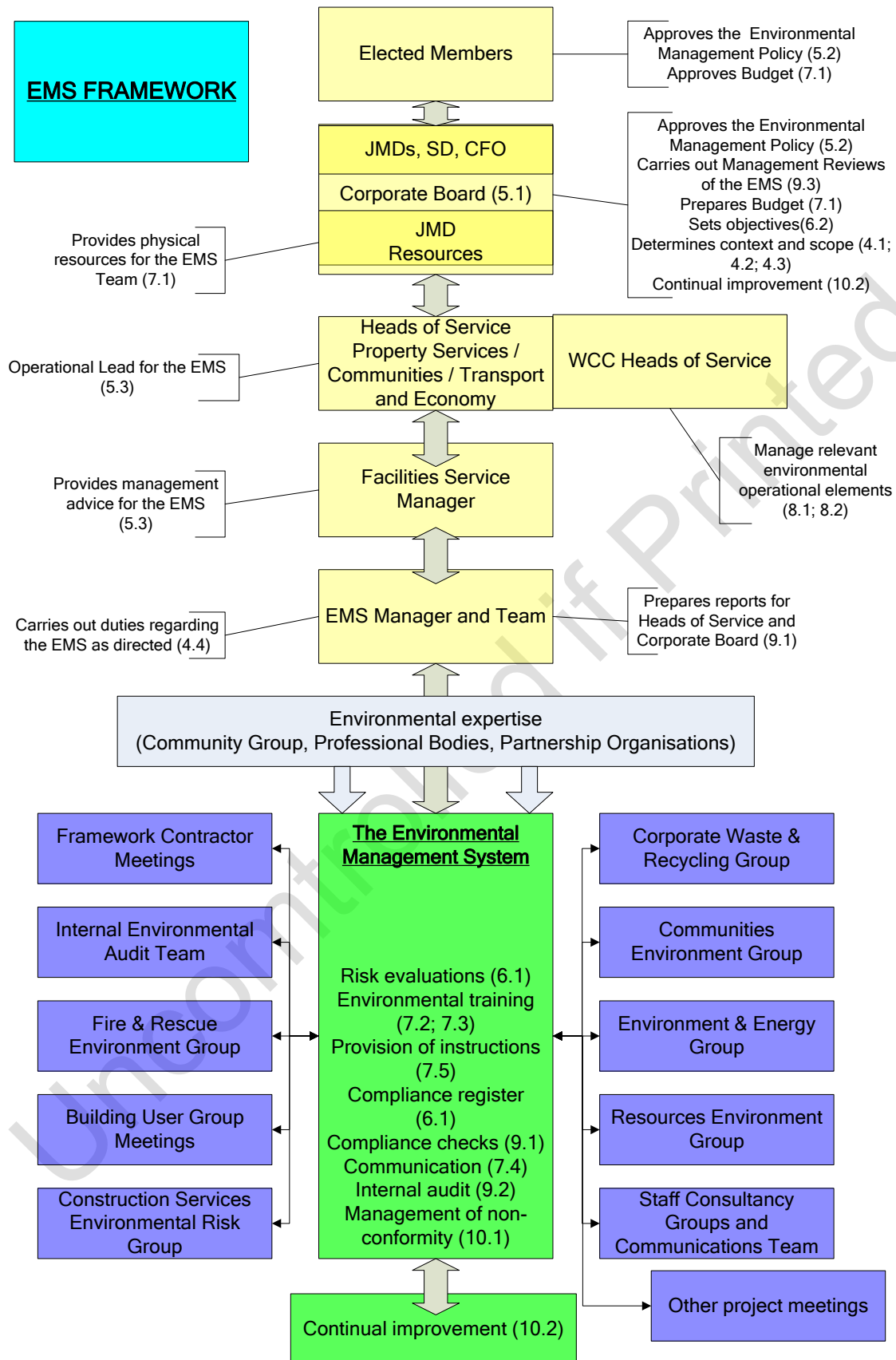
EMS FRAMEWORK

Elected Members — Approves the Environmental Management Policy (5.2) / Approves Budget (7.1)

JMDs, SD, CFO
Corporate Board (5.1)
JMD Resources

Approves the Environmental Management Policy (5.2) / Carries out Management Reviews of the EMS (9.3) / Prepares Budget (7.1) / Sets objectives (6.2) / Determines context and scope (4.1; 4.2; 4.3) / Continual improvement (10.2)

Provides physical resources for the EMS Team (7.1)

Heads of Service Property Services / Communities / Transport and Economy

WCC Heads of Service

Operational Lead for the EMS (5.3)

Manage relevant environmental operational elements (8.1; 8.2)

Facilities Service Manager

Provides management advice for the EMS (5.3)

EMS Manager and Team

Carries out duties regarding the EMS as directed (4.4)

Prepares reports for Heads of Service and Corporate Board (9.1)

Environmental expertise
(Community Group, Professional Bodies, Partnership Organisations)

Framework Contractor Meetings

Internal Environmental Audit Team

Fire & Rescue Environment Group

Building User Group Meetings

Construction Services Environmental Risk Group

The Environmental Management System

Risk evaluations (6.1)
Environmental training (7.2; 7.3)
Provision of instructions (7.5)
Compliance register (6.1)
Compliance checks (9.1)
Communication (7.4)
Internal audit (9.2)
Management of non-conformity (10.1)

Corporate Waste & Recycling Group

Communities Environment Group

Environment & Energy Group

Resources Environment Group

Staff Consultancy Groups and Communications Team

Other project meetings

Continual improvement (10.2)

Fig 3 – The EMS Framework

Leadership

Leadership and commitment

Leadership for the EMS is provided by Corporate Board. The diagram below demonstrates the relationship between WCC's Corporate Board (leadership team) and the EMS
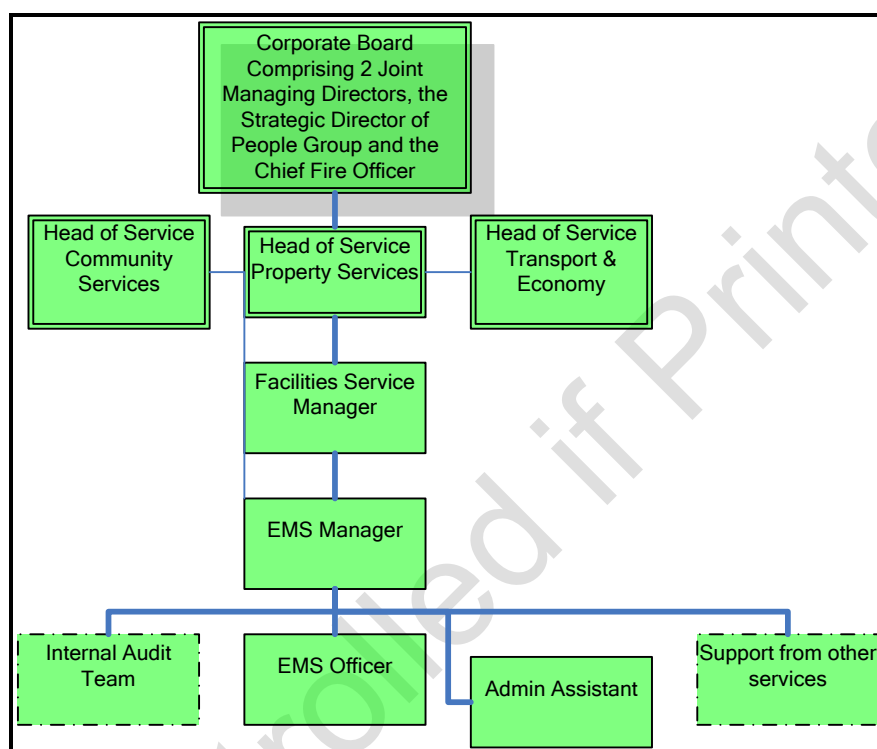
Fig 4 – Structure and support of the EMS Team

Wherever feasible and practicable environmental requirements, including those pertaining to the EMS are embedded into day to day operations.

Environmental Policy

An environmental management policy has been established and approved by Elected Members and WCC's Corporate Board.[4]

The environmental management policy is available on WCC's intranet and the Warwickshire Website. It has been communicated throughout the organisation via intranet articles, meetings and service specific communications.

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[4] Cabinet meeting April 2015

Key commitments within the policy are:-

- Comply with environmental legislation and other environmental compliance obligations

- Identify and manage the authority's significant environmental risks to an acceptable level and identify potential opportunities for improvement.

- Make best use of natural resources, employing life-cycle philosophy where practicable and managing wastes in line with the Waste Hierarchy.

- Safeguard the natural environment of Warwickshire within the authority's control, preventing pollution and protecting biodiversity and ecosystems

- Ensure the effective management of the authority's built and natural estate

- Maintain resilience regarding environmental threats to the organisation, its services and wider Warwickshire where the authority has control or influence

- Ensure that WCC staff have the necessary skills, competence and awareness regarding environmental aspects of their roles

- Through the above actions to achieve continual improvement of the Authority's environmental performance

Organisational roles, responsibilities and authorities

Corporate Board have assigned responsibility and authority for ensuring that the EMS conforms to the requirements of ISO 14001:2015 and for reporting on environmental performance and performance of the EMS to the Head of Service for Property Services.

This is realised through the Environmental Management System Team located within Facilities Management but operating throughout the organisation.

The EMS Framework diagram depicted in *Fig 3* on page 6 of this procedure demonstrates how different parts of the organisation interact with the EMS

Planning

Actions to address risks and opportunities

Risks and opportunities relating to strategic / high level environmental considerations regarding WCC Services and estate in line with the scope of the EMS have been

determined through examining WCC's core organisational functions and associated policies and business plans, determining the expectations of interested parties and interviewing relevant management. Information regarding strategic environmental risks are documented in **EMP 03** this includes associated compliance obligations.

Environmental Aspects

Environmental aspects regarding WCC services, operations and estate have been determined in line with the scope of the EMS. Evaluation of the associated impacts on the environment have been undertaken to identify environmental risk / issues that need addressing along with opportunities for improvement. External threats/opportunities to the organisation and its EMS have been included as part of this evaluation.

Evaluation of environmental aspects has taken the following into account as part of the evaluation process:-
- A life cycle perspective where applicable
- Whether WCC has control, influence or whether there is an indirect impact
- Normal, abnormal and reasonably foreseeable emergency conditions
- A PESTLE and SWOT approach has been used in the evaluation process

Information regarding significant environmental aspects is maintained.

Evaluation of environmental aspects and associated impacts is detailed in **EMP 06**

Compliance obligations

Compliance obligations relating to WCC's environmental aspects within the scope of the EMS have been identified through the evaluation of environmental aspects and impacts process documented in **EMP 03** and **EMP 06**

The requirements regarding these obligations and how they relate to WCC services, operations and estate are documented in The Compliance Register and the associated Compliance Guide **EMSG 101**.

A register of compliance obligations is documented in WCC's environmental **compliance register**. Requirements regarding legal requirements are updated using CECREC information systems quarterly. New and revised legislation, along with requirements to comply are communicated to relevant WCC management and, where appropriate, WCC contractors.

WCC is committed to adhering with compliance obligations and takes relevant obligations into account as part of the day to day operation of its services and progressing improvements.

Planning action

Actions regarding significant environmental aspects, compliance obligations, risks and opportunities are progressed via several different means, including:-
- Environmental improvement groups
- The EMS work plan
- Targeted projects
- Service specific operations

NB This list is not exhaustive. Progression of actions required is dependent upon the specific requirements and circumstances involved.

The effectiveness of actions taken is evaluated through management reviews, environmental improvement meetings, internal audit meetings, KPI assessments, contract meetings, environmental briefings, meetings with top management.

Environmental objectives and planning to achieve them

SMART[5] Environmental objectives have been set from the Environmental Management Policy, WCC's One Organsational Plan, High level Business Plans, compliance obligations and strategic environmental aspects. Objectives are documented in Appendix A of the Environmental Management Policy.

Actions to achieve environmental objectives along with relevant responsibilities, the evaluation process and communication routes are documented in relevant Environmental Objective progress sheets EMSF 1020.

<u>Support</u>

Resources

The required resources to implement the EMS have been determined and provided. This includes personnel, physical resources and communication channels.

Competence

The competence of personnel carrying out tasks that may affect WCC's environment performance and ability to fulfil compliance obligations is achieved through various means:

- Employing people with the appropriate qualifications, skills, knowledge and/or experience as part of the recruitment process;
- Requiring staff in key environmental positions to keep abreast of environmental developments relevant to their sphere of work through membership of appropriate professional bodies and Continual Professional Development (CPD);
- Providing training (external or internal) to enable staff to undertake specific activities through courses or on the job training; and

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[5] Specific, Measurable, Achievable, Realistic, Timebound

- Contracting the work to external providers having the appropriate skills, knowledge or experience.

Competence is checked as part of internal environmental audits and may also be reviewed as part of the staff appraisal system where applicable

Awareness

It is expected that WCC staff are aware of:-

- The environmental management policy;
- Significant environmental aspects of their work impacting on the environment;
- How they may be able to contribute to improving the environmental performance of the organisation;
- The implications of not conforming to environmental requirements

Many tasks undertaken by WCC staff are predominantly office based and do not affect key environmental decisions for the organisation. In these cases the impact on the environment is mainly energy use, use of paper, waste and possibly transport.

Managers are responsible for ensuring that staff are aware of their environmental responsibilities. This is supported by advice and information on the WCC intranet and documented in building user guides, premises guides and relevant codes of conduct and working instructions.

Awareness may be checked as part of internal environmental audits.

Communication

External Communication

As a public organisation WCC is required to respond to reasonable requests regarding its services and operations, including its EMS, in line with the Freedom of Information Act 2000 and the Environmental Information Regulations 2005.

The WCC website contains information regarding environmental policies and strategies, as well as advice regarding the services that WCC provides. Decisions made by Elected Members through County Council / Cabinet meetings concerning environmental initiatives are also available to the public via the WCC Website

External communication specific to the EMS that is available on the WCC Website includes:-

- The Environmental Management Policy
- Reporting of WCC greenhouse gas emissions
- Information regarding the EMS

Internal Communication

The main facility for communicating information regarding the EMS and associated general environmental information to internal staff is via WCC's intranet. Environmental information contained within the environmental guidance pages includes:-

- The Environmental Management Policy
- The Environmental Handbook
- Strategic environmental risks
- Associated environmental procedures/instructions
- The environmental compliance register
- Information regarding available training courses
- Frequently asked questions
- Links to pages having other environmental content

This is supported by regular articles on the intranet regarding current and forthcoming environmental initiatives

The Communications Plan

An EMS communications plan (EMSG 102) has been established detailing the processes used to disseminate environmental information. This includes the type of information, the routes used and the frequency of release/updates. The communications plan includes environmental training.

Documented Information

Documented information specific to the EMS

Documented information specific to WCC's EMS consists of:-

High level documents
- The Environmental Management Policy
- The Compliance Register
- The Internal Audit Programme (EMSF 1001)
- The EMS Communications Plan (EMSG 102)
- Overview of the EMS (EMP 01)
- The Environmental Handbook ISO 14001:2015 (EMP 02)

Procedures
- Identification and Determining the Needs and expectations of Interested Parties (EMP 03)
- Identification of Strategic Risk (EMP 04)
- Scope of the EMS (EMP 05)
- Environmental Risk Assessment (EMP 06)
- Competence, Awareness and Training (EMP 07)
- Internal Environmental Audit (EMP 08)

Supporting Documentation
- The Compliance Guide (EMSG 101)

- Environmental Aspects Evaluation Sheets (EMS1011)
- Internal/External Audit Forms - Various
- Procurement Risk Assessment (EMS 1016)
- The EMS Document Register Log (EMSF 1017)
- The Document Review and Change Sheet (EMSF 1018)
- The EMS Actions Log (EMSF 1019)

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- The Environmental Objectives Form (EMSF 1020)
- Spill Response Flowchart (WI 08.01)
- CEDREC – Guidance for Use (EMSG 102)
- Waste Guidance (EMSG 103)

Creating, updating and control of documented information

EMS specific documentation is identified by title and reference number, along with issue status. EMS specific documentation is approved by the Head of Service for Property Services, the Facilities Service Manager or the EMS Manager.

The main media for EMS documentation is electronic, with one copy maintained as a hard copy master version. Where required / requested paper versions of certain documents are made available – locations are recorded on the document control register to ensure that documentation is replaced with upon revision.

EMS documentation is reviewed annually and updated as required.

Documentation on WCC's Website is controlled via the electronic documentation records management system (EDRM). Each document has unique identification with retention times and approval routes.

External documentation

External documentation required for the EMS is controlled by the relevant holder.

Records regarding WCC Estate

The main vehicle for recording information and checks regarding WCC estate within the scope of the EMS is the electronic ATLAS system. The following information is retained within this system:-

- Building specific internal environmental audits
- Health and safety checks
- Asbestos checks and locations
- Condition survey checks
- Energy use
- Drawings
- Water hygiene information
- Site responsible persons

- Fire risk assessments

Operation

Operational control and planning

Processes to control environmental aspects within the scope of the EMS have been established and are implemented as appropriate throughout the various levels and function of the organisation. These controls are documented within aspects and impacts sheets. Procedures and instructions specific to operational tasks are controlled by the relevant management of the service/operation concerned.

Outsourced processes

Outsourced processes/products are controlled through WCC's procurement process. Contracts above the EU threshold are currently subject to OJEU requirements. As part of this an environmental procurement plan encompassing a risk assessment of environmental elements of the contract needs to be completed. Assessments are carried out via the electronic CSW JETS system.

Below this level the environmental procurement plan is not mandatory but may still be used. The EMS Team will assist in completing the environmental procurement plan and/or provide advice upon request. Where an outsourced process has significant environmental content information regarding the potential providers' environmental management should be sought (e.g. do they have a certified EMS) and, where relevant a life-cycle approach should be part of the consideration.

It is the responsibility of the relevant Contract Manager to check that environmental requirements regarding outsourced processes/products are fulfilled.

Emergency preparedness and response

General

The main generic emergency situation regarding WCC estate is the risk of fire. Preparation regarding this consists of:
- Regular (normally weekly) testing of fire alarms – supported by occasional evacuation tests in main buildings;
- Fire risk assessments
- Evacuation procedures;
- Annual checking of fire extinguishers; and
- Adequate training

Asbestos

Management of asbestos is undertaken by the Property Risk Team. Actions regarding the release of asbestos are documented in The Asbestos Management

Policy and associated procedures. Role of the Responsible Person training is provided – WCC is certified by UKATA to provide asbestos training.

Fire and Rescue

The main purpose of the Fire and Rescue service is to deal with emergency situations, including response to fire, flood and spillages and potential of a terrorist attack. The training that they receive (most of which is carried out by the service) equips them with the necessary competence to deal with environmental impacts of such incidents. The Fire and Rescue service also includes an arson reduction team that seeks to prevent arson incidents within the county.

Flood Risk

Risk of flooding has been identified as one of WCC's strategic risks. A Flood Risk Team has been established as part of WCC's Planning and Development Team. A Flood Risk Strategy has been approved by elected members.

CSW Resilience

The Coventry, Solihull and Warwickshire (CSW) Resilience Team has been established to prepare and respond to emergency situations throughout Coventry, Solihull and Warwickshire. This includes partnership working between the three different local authorities, emergency services, the Environment Agency and local residents. Tests regarding responding to various emergency situations are undertaken. Useful information regarding emergency centres, flood plains, grit bins etc is available on Compass

Spill Response

Some operations carried out by WCC staff carry a risk of oil/fuel spillages. These include Household Waste Recycling Centres, County Fleet Maintenance and Calibration Services. Staff working in these areas receive spill response training that is undertaken either by the supplier of spill response equipment or the EMS Team. This is supported by a spill response procedure. Tests are periodically carried out as part of the internal audit procedures.

Threat of a Terrorist Attack

In order to carry out its various functions many WCC buildings need to be accessible to the general public. However following the terrorist attacks in London (March 2017) and Manchester May 2017) Warwickshire is on CRITICAL security status. Although there is no specific known threat to WCC buildings all staff are advised to remain vigilant in the course of their work.

Fire stations have increased security (locked gates for all whole-time stations).
CCTV is in place in all vulnerable locations.
The rear gates to Shire Hall are kept locked and all contractors servicing Shire Hall are required to sign in at the Post Room prior to commencing work.

Action following an emergency incident

Following an emergency incident a review of the response is undertaken and procedures reviewed where required.

Records

Records of actual incidents and tests are documented and retained by the service experiencing the incident or undertaking tests. Actual incidents should be reported to the EMS Team where applicable.

<u>Performance</u>

Monitoring, measurement, analysis and evaluation

The items in Fig 5 below regarding WCC's environmental performance are subject to monitoring, measurement, analysis and evaluation as part of EMS reporting:-

Item	Method	Frequency	Audience
Results of internal audits	From internal audit programme	Quarterly	Managing Directors Strategic Directors Heads of Service Improvement Groups
Results of compliance checks	From internal audit results	Quarterly	Managing Directors Strategic Directors Heads of Service Improvement Groups
Grey fleet business mileage	Financial information from HR	Quarterly	Managing Directors Strategic Directors Heads of Service
Waste	Recycling information from Waste contractor	Quarterly	Managing Directors Strategic Directors Heads of Service
Greenhouse gas emissions	Information from purchased fuel, energy use and refrigerant emissions	Annually	Managing Directors Strategic Directors Heads of Service External
Energy use	Information from Energy Team	Annually	Managing Directors Strategic Directors Heads of Service

Item	Method	Frequency	Audience
Progress regarding environmental objectives and targets	Interviews with relevant WCC Managers	Annually (minimum)	Managing Directors Strategic Directors Heads of Service Improvement Groups
EMS specific KPIs and Projects	EMS Manager / Facilities Service Manager	Monthly	Head of Service – Property Services

Fig 5 – Performance measurement

The performance of the EMS is evaluated as part of the annual Management Review undertaken by Corporate Board. This includes the criteria noted in the table above.

Records of the evaluations are retained by the EMS Manager.
Evaluation of compliance

Evaluation of compliance is generally evaluated as part of the internal audit process. Discrepancies are noted in audit reports and actions to resolve issues progressed through the internal audit nonconformity process.

Results of compliance checks are reported to Managing Directors, Strategic Directors and Heads of Service quarterly in environmental briefings.

Internal Audit

WCC has an internal audit programme based on environmental risk and results of previous audits.

Refer to **EMP 08** for details of the internal audit process, including reporting of audit results, auditor selection and progression of actions to resolve nonconformities.

Management Review

Corporate Board are responsible for conducting a review of the EMS annually.

The Management review along with quarterly reporting considers the following issues:-

- Actions from previous management reviews
- Changes in
    - External and internal issues relevant to the EMS
    - Needs and expectations of interested party
    - Significant environmental impacts
    - Risks and opportunities
- The extent to which environmental objectives and targets have been met
- Environmental performance, including:-
    - Nonconformities, observations, corrective actions
    - Compliance checks

- o Results of monitoring and measurement
  - o Internal and external audit results
- Adequacy of resources
- Relevant communications from interested parties
- Opportunities for improvement
- Whether the EMS is still suitable and fulfilling its intended purpose

Improvement

Opportunities for improvement

Opportunities for improvement are identified through:-
- The internal audit process
- The evaluation of operational environmental aspects and impacts
- Improvement group meetings
- Staff suggestions
NB This list is not exhaustive

Nonconformity and corrective action

Nonconformities may arise from several sources – the most common is via the internal audit process. The process to progress actions to correct nonconformities, determine and eliminate causes for nonconformities, review effectiveness of actions taken are documented in the Internal Audit Procedure **EMS 08**

Continual improvement

WCC seeks to continually improve the suitability, adequacy and effectiveness of its EMS in order to improve its environmental performance.