



ENVIRONMENTAL MANAGEMENT POLICY

Originator:	Policy and Strategy Team
Approval date:	12 th April 2022
Review date:	April 2025

1	Introduction
1.1	As responsible business and employer, Pine Court Housing Association (PCHA) will examine every aspect of its core business activities to identify opportunities to reduce waste / reuse materials and minimise where possible any negative environmental impact.
1.2	<p>This Policy covers the waste creation, disposal and recycling opportunities that are created by PCHA core business activities of:</p> <ul style="list-style-type: none"> • Housing management services • Management of maintenance and repair services • All other commercial contracts • Back office and corporate functions
1.3	The policy does not cover the waste or recycling obligations of customers for whom PCHA provides services, although every effort will be made to work in partnership with clients and point of service customers to promote responsible waste management and recycling regimes.
1.4	The policy also covers the wider activities PCHA engage in that support the upkeep and delivery of its structured environmental management system.
1.5	<p>Operation of the Policy enables PCHA to meet the requirements of the Regulatory Framework for Social Housing, introduced by the Homes and Communities Agency as follows:</p> <ul style="list-style-type: none"> • When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas • Registered providers must co-operate with relevant partners to promote social, environmental and economic wellbeing in the areas where they provide social housing
1.6	In operating the Policy PCHA will ensure it meets the requirements of the relevant legislation and regulatory codes as follows:

- Environmental Protection Act 1990
- Environmental Protection (Duty of Care) Regulations 1991
- Environmental Permitting Regulations 2010
- Energy Efficiency Regulations 2015
- Hazardous Waste Regulations 2005
- List of Waste Regulations 2005
- The Waste Framework Directive (WFD) 2008
- The Waste (England and Wales) Regulations (WR) 2011
- Waste Electrical and Electronic Equipment (WEEE) 2013
- Waste Transfer Regulations 2005
- Control of Substances Hazardous to Health (COSHH) 2002 as amended
- Environmental Damage Regulations 2009
- Scrap Metal Dealers Act 2013
- Control of Pollution (Oil Storage Regulations) 2001

1.7 Access and Communication

1.7.1 PCHA is committed to ensuring that the services it provides are accessible to everyone. PCHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for PCHA or use its services.

1.7.2 Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date.

1.8 Equality, Diversity and Human Rights

1.8.1 PCHA is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Pregnancy and Maternity, Marriage and Civil Partnership, Religion and/or Belief.

1.8.2 PCHA also recognises that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

1.8.3 PCHA will endeavour to ensure that all services and actions are delivered within the context of current Human Rights legislation and will make every effort to ensure staff and others with whom PCHA works, will adhere to the central principles of the Human Rights Act (1998).

2 Statement of Intent

2.1 PCHA is committed, within a structured management system, to reduce as far as is practically possible any negative environmental impacts that may arise from its core business activities. This will be achieved through consistent application of:

- Planning environmental objectives, targets and programmes
- Implementing processes
- Checking and auditing of activities

<p>2.1</p> <p>2.2</p> <p>2.3</p> <p>2.4</p> <p>2.5</p>	<ul style="list-style-type: none"> ● Reviewing and delivering continuous improvement <p>Within the structured management system, PCHA will seek to achieve the following environmental goals:</p> <ul style="list-style-type: none"> ● Comply with all relevant legislation, standards and codes of practice relevant to operations <p>Strive to make efficient use of energy and materials, including substitution of renewable resources wherever possible:</p> <ul style="list-style-type: none"> ● Reduce waste by actively promoting the recycling of materials and the use of recycled goods and ensure that all associated residual waste materials are disposed of in a safe and responsible fashion ● Seek to reduce harmful emissions wherever possible ● Reduce energy and materials (including water use) consumption in PCHA offices, and help residents in social housing owned by PCHA to save energy in the running of their homes ● Reduce our Carbon Footprint ● Promote environmental awareness to employees, sub contactors and customers ● Ensure that the Policy is brought to the attention of all employees <p>PCHA’s management system has been externally certificated to ISO 14001:2015 Environmental Management Systems (in line with the Sovini Group) and will be added/included within the scope of the activities.</p> <p>PCHA will maintain an environmental 'aspects and impacts register' of all of its core activities. The register will help PCHA identify the most significant activities where there is an interaction with the environment, whether that be the physical environment or with people, to maximise positive impacts and to mitigate and control any negative impacts.</p>
<p>3</p>	<p>Policy</p>
<p>3.1</p> <p>3.2</p> <p>3.2.1</p> <p>3.2.2</p> <p>3.3</p> <p>3.3.1</p>	<p>PCHA applies the waste hierarchy principles of ‘reduce, re-use and recycle’ to all of its core business activities. Outlined below are the ways in which these principles are applied to create efficiencies and reduce any negative environmental impacts:</p> <p>Actions to Reduce Waste</p> <p>PCHA is also committed, where possible, to employing local labour reducing the amount of ‘travel to work’ emissions for its staff</p> <p>Our locally based Waste Contractor partner is ideally situated to process our trade waste and thereby reduce the distance our trade vehicles have to travel</p> <p>Actions to Reuse Materials</p> <p>PCHA will look to reuse specialist equipment, known as ‘aids and adaptations’ that has been supplied to meet the needs of disabled customers where possible. This will be dependent on condition and according to the needs of individual customers.</p>

3.4	Actions to Recycle Materials
3.4.1	Recycling Office Waste
3.4.1.1	Throughout all of its core business activities PCHA is committed to reducing waste, wherever possible, and has in place accurate recording mechanisms with its preferred waste contractors to provide detailed reports on all office waste that is recycled.
3.4.1.2	PCHA also has in place effective arrangements to ensure any waste produced from its office-based activities is sorted and recycled including special arrangements for recycling of confidential waste, cardboard and packaging, timber and reuse of electrical / computer equipment in accordance with WEEE 2013 Regulations.
3.5	Classifying and Transferring Waste
3.5.1	PCHA ensures all waste created from its core business activities is classified and transferred correctly, in compliance with the List of Waste Regulations 2005 and the Waste Regulations 2011. In fulfilling its obligations in this area PCHA will ensure all relevant documentation is completed including:
3.5.1.1	<p>Waste transfer notes for non-hazardous waste – including:</p> <ul style="list-style-type: none"> ● A general description of the waste ● The quantity of the waste ● How the waste is packaged or contained – (including a signed declaration that the waste hierarchy requirements have been applied) ● The address from where the waste has been collected and the party receiving the waste – (including relevant permits and licenses) ● The date, time and place of transfer ● The appropriate waste codes (depending on the category of waste being transferred)
3.5.1.2	<p>Consignment notes for hazardous waste – including:</p> <ul style="list-style-type: none"> ● Notification details (details of the producer of the waste) ● A description of the waste including list of Waste Codes and quantities – (including a signed declaration that the waste hierarchy requirements have been applied) ● Details of the Carriers Certificates (the person who carries or transports the waste) ● Details of the Consignors Certificates (the person requesting the waste to be removed) ● Details of the Consignees Certificates (the person who receives the waste to recover or dispose of it)
3.5.1.3	PCHA will retain records of transfer notes and consignment notes for a minimum of two and three years respectively.
3.6	The 'Aspects and Impacts' Register
3.6.1	PCHA has compiled a register of all of its core activities to determine which areas of its work, the products it uses and the services it provides has the biggest impacts on the environment.

3.6.2	<p>Each area of activity is then given a risk factor to determine its priority for immediate action through the use of control measures or provides a target for improvement based on:</p> <ul style="list-style-type: none"> • Legislative requirements • The potential for harmful environmental impacts, i.e. pollution • The reaction of third parties to the activity, i.e. the effects it has on customers, clients and others on whom the activity touches • The magnitude of the activity (and quantities produced – where waste is concerned) as a proportion of PCHA’s overall activities
3.6.3	<p>In maintaining the register PCHA also includes all of its office-based activities, supply chain management and procurement functions to ensure the approach to environmental management is all encompassing.</p>
3.7	<p>Substances Hazardous to Health</p>
3.7.1	<p>As a responsible employer, PCHA will aim to provide a safe working environment for its staff at all times including the need to comply with the Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended). In meeting its duties under COSHH, PCHA will follow the good practice guidelines produced by the Health and Safety Executive as follows:</p> <ul style="list-style-type: none"> • Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health • Take into account all relevant routes of exposure – inhalation, skin absorption and ingestion – when developing control measures • Control exposure by measures that are proportionate to the health risk • Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health • Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment • Check and review regularly all elements of control measures for their continuing effectiveness • Inform and train all employees on the hazards and risks from the substances they work with and the use of control measures developed to minimise the risks • Ensure that the introduction of control measures does not increase the overall risk to health and safety • Dispose of substances hazardous to health in line with Material Safety Data Sheet Requirements
3.7.2	<p>In addition to the above, PCHA will comply with regulations for working with other materials that are known to pose a risk to health, that are not covered by the COSHH regulations including Asbestos (See PCHA Asbestos Management Policy for details).</p>
3.8	<p>Management of Spills of Potential Pollutants</p>
3.8.1	<p>In line with its requirements under the Environmental Damage Regulations 2009, PCHA will carry out risk assessments for all activities and locations where there is potential for materials used to cause environmental damage including:</p>

	<ul style="list-style-type: none"> ● Serious damage to surface water or ground water sources ● Contamination of land where there is significant risk to human health ● Serious damage to natural habitats <p>3.8.2 The risk assessment will as a minimum seek to:</p> <ul style="list-style-type: none"> ● Identify the materials stored or handled that may be a hazard ● Identify and assess potential links between each hazard source, pathways and receptors i.e. the location and nature of potential escape routes for pollutants (for example water courses or drainage facilities) ● Asses the likelihood and magnitude of any potential harmful effects ● Ensure suitable prevention measures are in place through effective site management procedures e.g. use of correct signage and secure storage of harmful materials <p>3.8.3 Where significant risks are identified, PCHA will draw up a site-specific Incident Response Plan that will include:</p> <ul style="list-style-type: none"> ● Contact details of the PCHA staff member who will act as a major incident co-ordinator ● Reporting requirements to the Environmental Agency for any major spill incidents that have potential to cause harm to people or the environment ● An outline of how the potential clean-up operation will be managed ● How any residues will be safely removed and disposed of ● Contact details for registered clean-up contractors, if required <p>3.8.4 In addition, PCHA will provide training for staff whose roles and working environment increases the risks posed by major spill incidents, so they know:</p> <ul style="list-style-type: none"> ● What they should / shouldn't do in the event of major spill ● Where they can access personal protective and pollution control equipment / materials ● Where they can access the site-specific incident response plan
4	Implementation
4.1	All PCHA employees have a responsibility for being aware of and implementing the PCHA Environmental Management Policy.
4.2	The Data and Quality Assurance Manager will have specific responsibility for ensuring all necessary certification and licenses, that support the operation of this Policy are in place and up to date which will be checked regularly through system audits.
5	Performance
5.1	<p>The following performance indicators underpin the operation of this Policy will be reported to the Health and Safety, Environmental and Quality Group annual review:</p> <ul style="list-style-type: none"> ● %reduction in gas consumption in PCHA offices ● % reduction in electricity consumption in PCHA offices ● % increase in volume of cardboard recycling year on year ● Achieve in excess of 85% for office waste recycling

	<ul style="list-style-type: none"> • % increase in the volume of wastepaper recycling year on year • % reduction in total annual carbon footprint (CO2) emissions in comparison with the base year's data 			
5.2	The above targets will be reviewed and amended on an annual basis, based on actual performance.			
6	Consultation			
6.1	All PCHA Staff have been consulted in the development of this Policy.			
7	Review			
7.1	The Policy will be reviewed once every three years from the date of Operations Director's approval or sooner if required by the introduction of new legislation, regulation or if necessitated by changes to PCHA working practices / as a result of system audits.			
8	Equality Impact Assessment			
8.1	Was a full Equality Impact Assessment (EIA) required?	No		
8.2	When was EIA conducted and by who?	The EIA was conducted by the Policy Writer and the Policy Strategy Manager on 25 October 2016		
8.3	Results of EIA	The EIA did not indicate any differential impacts on any of the groups with protected characteristics.		
9	Scheme of delegation			
9.1	Responsible committee for approving and monitoring implementation of the Policy and any amendments to it	Operations Director-PCHA		
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Operations Director-PCHA		
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director-PCHA		
10	Amendment log			
	Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
	26/11/2019	In line with the review schedule	See section 6	The Policy has been developed to cover PCHA's activities only.

12 th April 2022	In line with the review schedule	See section 6	<p>Change at 1.4 – inclusion of Energy Efficiency Regulations 2015.</p> <p>Change at 4.2 –amended to read ‘the Data and Quality Assurance Manager will have specific responsibility for ensuring all necessary certification and licenses are in place and up to date which will be checked regularly through system audits’.</p> <p>Changes at section 5 as follows:-</p> <ul style="list-style-type: none"> ● Removed the % reduction in water consumption in PCHA offices ● Reworded that to achieve in excess of 85% for office waste recycling ● Replaced the % reduction in total carbon footprint (CO₂) emissions from office and fleet use by 40% with - Reduction in total, annual carbon footprint (CO₂) emissions in comparison with the base year’s data
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