



MICHAEL W HALSALL
S O L I C I T O R S

Environment Policy

Michael W Halsall Solicitors Limited

11 The Parks, Newton-le-Willows, Merseyside, WA12 0JQ

T: (01942) 727 000

F: (01942) 717 555

E: info@halsalls.com

W: www.halsalls.com

AMENDMENTS

Issue	Date	Section	Comments
A	19.04.06	All	Issued for comment.
B	18.07.06	All	Issued for comment.
1	07.08.06	All	Formally issued for use.
2	29.02.08	All	Review and update.
2	29.02.08	3.3.3	Addition of <i>Non-Hazardous Waste</i> .
2	29.02.08	3.4.1	Addition of <i>Waste Storage</i> .
2	29.02.08	3.5	Addition of <i>Reuse and Recycle</i> .
2	29.02.08	3.8	Addition of <i>Vehicles</i> .
2	29.02.08	Appendix A	Addition of <i>Environmental Advice and Useful Information</i> .
3	26.06.09	1	Addition of <i>Introduction</i> .
3	26.06.09	2	Amendment to Statement of Intent (new layout).
3	26.06.09	3	Amendment to Organisational Hierarchy (inclusion of Emma Higgins (Human Resources Manager)).
3	26.06.09	3	Amendment to Organisational Hierarchy (addition of <i>Duties of the Human Resources Manager</i>).
3	26.06.09	4	Removal of <i>Statutory Nuisance (Noise)</i> .
3	26.06.09	4	Addition of <i>Environmental Damage</i> .
3	26.06.09	Appendices	Removal of <i>Environmental Advice and Useful Information</i> (replaced with <i>Appendix 1 - Environmental Information Sources</i>).
3	26.06.09	Appendices	Addition of <i>Appendix 1 - Environmental Information Sources</i> .
4	21.07.10	All	Complete Review and Update.
4	21.07.10	All	Amendment to Organisational Hierarchy.
4	21.07.10	All	Amendment of Monitoring and Review.
4	21.07.10	All	Addition of <i>Appendix 1 - Environmental Legislation</i> .
5	12.12.11	All	Complete Review and Update.
5	12.12.11	All	Re-formatting.
6	25.01.12	All	Re-issued to ensure consistency with the date of issue of all other documents contained within the Michael W Halsall Solicitors Safety, Health and Environmental Management System.
7	24.01.13	All	Complete Review and Update.
8	08.04.13	3	Amendment to IT Manager (from Andrew McKee to Nicholas Lloyd).
8	08.04.13	3.1	Amendment to IT Manager (from Andrew McKee to Nicholas Lloyd).
9	29.01.14	All	Review and Update; Reformatting.
9	29.01.14	All	Amendments made throughout to reflect the change from a partnership to a limited company.
9	29.01.14	All	Amendments made throughout in-line with the company's Health and Safety Policy layout.
10	30.01.15	All	Complete Review and Update.
10	30.01.15	3.5	Addition of <i>Training and Competence</i> .
11	29.01.16	All	Complete Review and Update.
12	31.01.17	All	Complete Review and Update.
13	30.03.17	Front page	Amendment to postal address.
13	30.03.17	2.1	Amendments to Environmental Policy Statement (issue/review dates).

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1 INTRODUCTION

1.1 The Company

Michael W Halsall Solicitors Limited is one of the UK's leading firms specialising in Road Traffic Accident and Personal Injury Claims. The Practice was established in 1987 by Michael Halsall to deal exclusively with uninsured loss recovery claims and personal injury litigation.

More recently the company has increased their specialisms to include clinical negligence and industrial disease cases.

Michael W Halsall Solicitors Limited operates from 11 The Parks which is located in Newton-le-Willows, Merseyside.

Michael W Halsall Solicitors Limited is controlled by its Managing Director Mr Michael Halsall.

Mr Michael Halsall is identified as having overall responsibility for the environment and is thus identified as the Director with Responsibility for the Environment.

Mr Neville Wall is the company's Office Manager but for the purpose of this document he is identified as the Environmental Coordinator.

Mr Michael Halsall may delegate some of his environmental duties to the Environmental Coordinator on a daily basis.

Where and when appropriate, he in turn may delegate some of his environmental duties to the Human Resources Manager (Monique Wood). She in turn, may delegate some of her environmental duties to a specifically nominated employee on a daily basis, as required.

All other staff, not identified in this policy, have duties as employees as laid out in 2.8 Duties of Employees.

Some of the work undertaken by the company may be contracted to other firms with which the company has established and satisfactory relationships. Contractors to the company have specific duties as defined in 2.9 Duties of Contractors.

1.2 Environmental Management Systems

This document is the Environment Policy of Michael W Halsall Solicitors Limited, and as such sets out the company's aims and objectives for minimising the impact of its operations on the environment

The Policy covers all of the company's general office and associated operations.

The company's Environment Policy:

- Explains the organisation and arrangements for carrying out the Policy.
- Is revised as often as may be appropriate.
- Explains how the Policy and any revisions are brought to the attention of our employees.

At Michael W Halsall Solicitors Limited, environmental issues rank equally with other business objectives and achieving good environmental performance is recognised as being consistent with overall successful business performance.

We also recognise that failure to integrate these issues into our operations will inevitably result in harm to the environment and subsequent loss. We therefore take an integrated approach where managing health, safety and environment forms part of the overall business strategy.

The 'risk assessment' process is integral to the Policy and forms the basis of the company's Environmental Aspects & Impacts Register. This enables us to establish effective environmental arrangements to control those risks arising from our operations.

An accepted Plan, Do, Check, Act (PDCA) approach has been followed by the company to establish an effective Environmental Management System (EMS) of which the Policy is the cornerstone.

The PDCA framework achieves a balance between the systems and the behavioural aspects of management and enables the company to treat the environment as an integral part of good management generally, rather than as stand-alone systems.

The PDCA approach enables the company to identify those actions necessary in the development of effective arrangements.



2 PLAN

- Identify the company's current position and where it needs to be.
- Identify what needs to be achieved, who will be responsible for what, how identified aims will be achieved, and how success will be measured.
- Decide how performance will be measured. Consider methods that go beyond incident figures, look for leading indicators as well as lagging indicators.
- Consider emergencies that affect the environment such as fire. Co-operate with anyone who shares the workplace and co-ordinate plans with them.
- Plan for changes and identify specific legal requirements that apply.



2.1 Environmental Policy Statement



I confirm the commitment of Michael W Halsall Solicitors Limited to a management framework which pursues continual and progressive environmental improvement. We appreciate that our activities have the potential to influence the environment and we are committed to minimising or mitigating where possible any adverse impacts.

Michael W Halsall Solicitors Limited will ensure that we:

- Establish a framework for setting and reviewing environmental objectives and targets.
- Assess the environmental impacts of our operations. For example, from the use of plant and equipment to the collection and ultimate disposal of wastes.
- Create a culture whereby environmental considerations are integrated into every day decisions and activities.
- Maximise the efficient utilisation of all resources, raw materials and energy.
- Minimise the creation of waste and encourage the recycling of waste as appropriate.
- Eliminate occasions whereby any form of environmental nuisance is caused.
- Ensure that our employees are aware of their own responsibilities and that they are given the support, information, instruction and training necessary to fulfil them.

The company appreciates that the management of environmental matters cannot be effective unless it actively involves and gains co-operation and commitment from all employees. Communication and consultation with employees on environmental matters is seen as a vital part of this process, therefore provision has been made for the active consultation with employees on all such matters.

The management of environmental matters is seen by Michael W Halsall Solicitors Limited as an essential part of the role of the company's management team. We therefore place a responsibility on the management team to maintain an awareness of the implications of our activities on the surrounding environment and on the communities within which we operate.

The company will take appropriate actions to ensure pollution prevention and compliance with the *Environmental Protection Act 1990* and any other associated environmental legislation.

The company will, where practicable, ensure that adequate resources (e.g. people, time, money and facilities) are made available to enable all employees to meet the requirements of the Policy.

Michael W Halsall Solicitors Limited will ensure the continuous monitoring and the regular review of the company's Environment Policy to ensure its objectives are met. To this aim the company will ensure that the policy is revised at least annually.

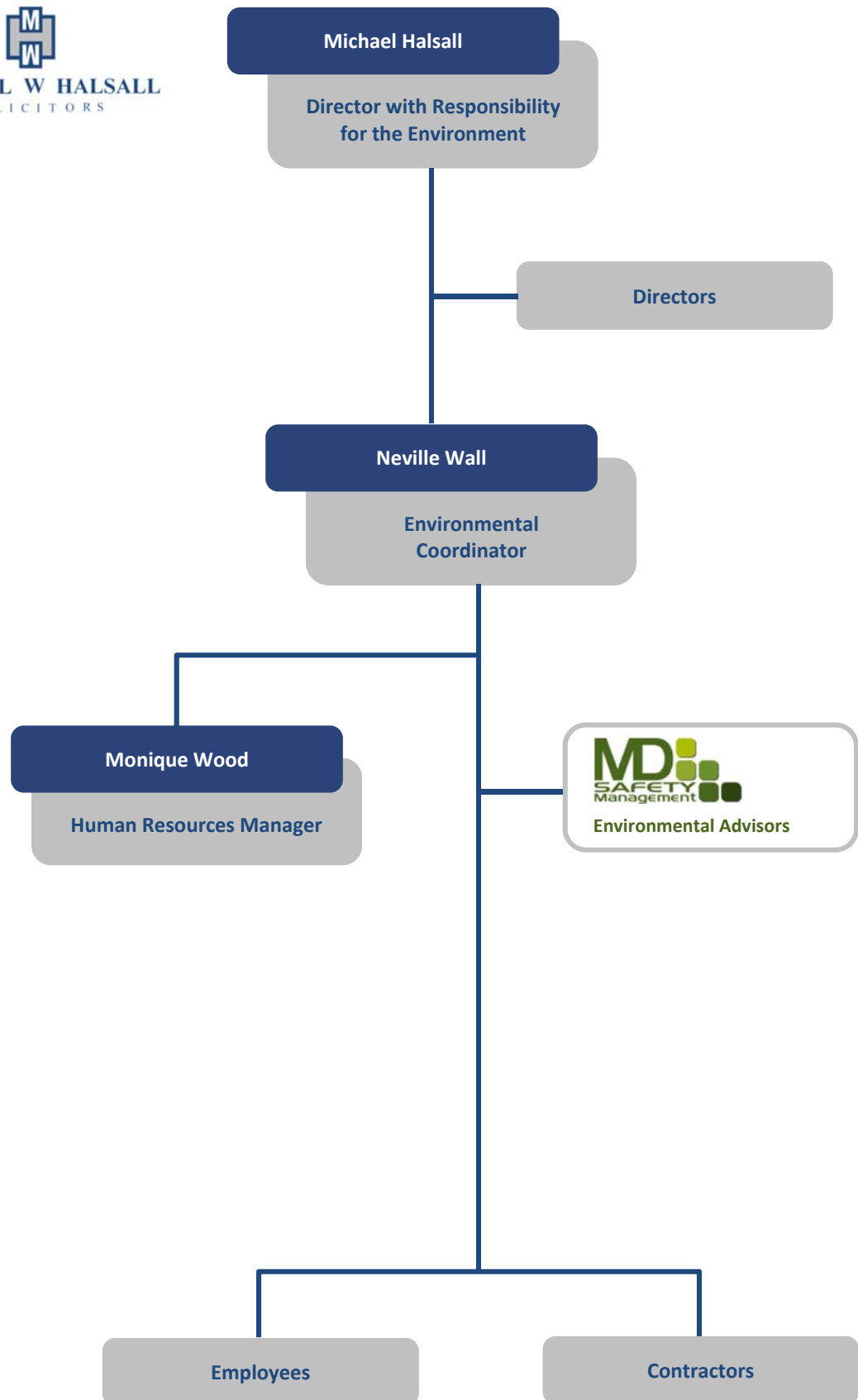
Director with Responsibility for the Environment

Michael Halsall

Issued: 29th March 2018

Planned review date: 28th March 2019

2.2 Organisational Hierarchy



2.3 Duties of the Director with Responsibility for the Environment

- Be ultimately responsible for all environmental arrangements and ensuring that they are effectively implemented.
- Ensure that sufficient resources are made available to duty holders to enable them to fulfil their environmental duties.
- Ensure that monitoring of the Policy is undertaken as necessary.
- Ensure that the performance of the Policy is reviewed as often as appropriate.
- Ensure that arrangements for the Policy are reviewed as often as appropriate.
- Ensure that when amendments are made to the Policy these amendments are circulated to employees.
- Ensure that the environment is on the agenda of management meetings.
- Ensure that Environmental Consultants employed by the company have access to suitable and sufficient resources (e.g. information regarding the company's undertakings, suitably knowledgeable staff, etc.).
- Ensure that the environmental aspects of the company are identified and the significance of their impacts assessed (Environmental Aspects and Impacts Register). The Director with Responsibility for the Environment is also ultimately responsible for ensuring that the results of these are communicated to employees.
- Be responsible for setting a good personal example with regard to the well-being of the environment.
- Ensure that employees are provided with any necessary information, instruction and training to fulfil the requirements of this Policy.
- Ensure the arrangement and implementation of a system of discipline for cases where a breach of this Policy occurs or where duties are not undertaken.
- Ensure that when the company employs contractors, so far as is reasonably practicable, these contractors are made aware of, and are subject to, the company's Environment Policy.
- Ensure the arrangement of an adequate system of environmental incident reporting and investigation and that these arrangements are communicated to all employees.
- Ensure that appropriate work equipment is regularly inspected and maintained to ensure that it remains suitable for the purpose for which it was intended.
- Ensure that adequate instruction is given for the operation of work equipment, including those items used to control accidental spillages or release to the environment.

2.4 Duties of the Directors

- Work closely with the Director with Responsibility for the Environment in the provision of suitable and sufficient environmental arrangements.
- Promote the company's Environmental Management System as an integral part of the way in which the company operates.
- Set a good personal example and ensure that when others fail to consider the well-being of the environment, they are counselled and/or disciplined as necessary.

2.5 Duties of External Environmental Consultants

MD Safety Management Ltd is employed by Michael W Halsall Solicitors Limited as Environmental Consultants on a demand basis to advise the company on general environmental matters.

MD Safety Management Ltd will:

- Ensure they are competent to perform the services required.
- Ensure enrolment on a programme of Continuing Professional Development (CPD) or other lifelong learning scheme.
- Carry appropriate Professional Indemnity (PI) Insurance.
- Report to the Safety, Health and Environmental Coordinator.
- Advise the company to an agreed level.
- Remind the company in good time when issued documentation should be reviewed and updated.

The Consultant services include:

- Advice regarding current environmental legislation.
- Assistance in producing, reviewing or updating company environmental documentation.
- Assistance in advising on the legally required notification to the Enforcing Authority following an environmental incident.
- Assistance in undertaking environmental inspections and audits.
- Assistance in incident occurrence investigation to determine root causes and to prevent recurrence.
- Assistance in providing information on request to the company regarding best practice for environmental management.

2.6 Duties of the Safety, Health and Environmental Coordinator

- Work closely with the Directors and the Director with Responsibility for the Environment in the implementation and supervision of environmental arrangements on the Michael W Halsall Solicitors Limited premises.
- Ensure that information is given to all employees on general environmental topics and any necessary specific information concerned with day-to-day operations.
- Be responsible for setting a good personal example and to ensure that when others fail to adequately consider the well-being of the environment, they are counselled and/or disciplined as necessary.
- Ensure that when the company intends to employ contracted services, appropriate documentation is sought from prospective contractors, including policies and procedures, so as to assess their suitability (competency).
- Ensure that when the company employs contractors, so far as is reasonably practicable, these contractors are made aware of, and are subject to, the company's Environment Policy.
- Ensure the regular inspection of work equipment to ensure it remains suitable for its' intended purpose, including its' general state of repair (e.g. free from leaks).
- Ensure that adequate instruction is given for the operation of any work equipment.

2.7 Duties of the Human Resources Manager

- Work closely with the Environmental Coordinator in the implementation and supervision of environmental arrangements on the Michael W Halsall Solicitors Limited premises.
- Assist the Environmental Coordinator in the dissemination of general environmental information to employees, including any specific information concerned with day-to-day operations.
- Ensure that any environmental incident involving employees is reported immediately to the Environmental Coordinator. Any environmental near misses involving employees must also be reported to the Environmental Coordinator.
- In co-operation with the Environmental Coordinator, ensure the suitability of contractors by assessing their submitted policies and procedures, where relevant.
- Ensure that when the company employs contractors, so far as is reasonably practicable, these contractors are made aware of, and are subject to, the company's Environment Policy.
- Be responsible for setting a good personal example and to ensure that when others fail to adequately consider the well-being of the environment, they are counselled and/or disciplined as necessary.

2.8 Duties of Employees

- Cooperate with the company's Environment Policy in meeting any environmental requirements.
- Avoid damage to the environment whilst undertaking their work activities.
- Report immediately to the Human Resources Manager or to the Environmental Coordinator, any environmental incident involving employees.
- Make suggestions whereby any detrimental impacts to the environment caused by current working practices could be eliminated or reduced.
- Not interfere with, or misuse or abuse anything provided by the company to protect the environment.
- Ensure that all materials and equipment are used correctly and to keep such materials and equipment in good condition.

2.9 Duties of Contractors

Contractors should note that the requirements given below form the basis of the environmental rules for Michael W Halsall Solicitors Limited contractors.

All contractors have a duty to:

- Comply with the Michael W Halsall Solicitors Limited Environment Policy and must, where appropriate, ensure their own company Environmental Policy and Arrangements, where appropriate, are made available.
- Provide Method Statements and relevant Risk Assessments when carrying out activities, which could be detrimental to the environment. Method Statements must be agreed with the Environmental Coordinator or his nominated deputy before work begins and copies of Method Statements and Risk Assessments must be made available on-site so that compliance with the agreed Method Statement can be monitored/maintained.
- Ensure that any equipment used by contractors is inspected to ensure that it is maintained in accordance with the *Provision and Use of Work Equipment Regulations 1998*.
- Ensure that their employees do not interfere with, or misuse or abuse anything provided by the company to protect the environment.

- Report immediately to the Environmental Coordinator or his nominated deputy, any environmental incident involving any of its employees.
- Ensure that their employees obey any environmental instructions given by Michael W Halsall Solicitors Limited.
- Ensure that any material or substance brought onto a Michael W Halsall Solicitors Limited premises, is stored in accordance with relevant Regulations and current recommendations.
- Ensure that workplaces are kept tidy and any debris, waste materials, etc. is cleared away and appropriately disposed of in adherence with Local Authority (LA) Guidelines.
- Ensure that appropriate accidental spillage control arrangements are provided for use during their operations on the Michael W Halsall Solicitors Limited premises.
- Ensure that any accidental spillages are cleaned up immediately utilising appropriate spillage control equipment and materials, and ensure that any waste materials are disposed of in adherence with Local Authority (LA) Guidelines.

3 DO – ENVIRONMENTAL MANAGEMENT

Identify the risk profile of the organisation

- Assess the risks, identify what could cause harm, what it could harm and how, and what needs to be done to manage the risk.
- Decide what the priorities are and identify the biggest risks.

Organise activities to deliver the plan

- Involve the entire workforce and ensure that everyone is clear on what is required of them. Establish clear methods of communication between employees and management to help develop positive attitudes and behaviours.
- Provide adequate resources, including competent environmental advice where needed.



Implement the plan

- Decide on the preventive and protective measures needed and put them in place.
- Provide the right tools and equipment to do the job and keep them maintained.
- Train and instruct, to ensure everyone is competent to carry out their work.
- Supervise to make sure that arrangements are followed.

Detailed in this section are the general arrangements that have been put in place to manage environmental matters. The arrangements are based on the requirements of current environmental legislation as well as the company's risk profile.

3.1 Environmental Damage

Michael W Halsall Solicitors Limited is aware of the environmental liability requirements of the *Environmental Damage (Prevention and Remediation) Regulations 2009*, with regard to the prevention and remedying of environmental damage.

The company understands that "environmental damage" means:

- Adverse effects on protected species or habitats (or a Site of Special Scientific Interest (SSSI)).
- Adverse effects to surface water or groundwater (by contamination leading to a reduction in water quality).
- Adverse effects to land (by contamination resulting in a significant risk of adverse effect on human health).

Michael W Halsall Solicitors Limited will take all reasonable steps to prevent environmental damage, however in the unlikely event that environmental damage is caused, the company will:

- Take immediate action to prevent further damage.
- Notify the relevant Enforcing Authority of the damage.
- Assist in the identification of remedial measures.
- Implement such remedial measures as is required to remediate the damage to an acceptable level.

3.2 Environmental Aspects and Impacts Register

Michael W Halsall Solicitors Limited will formulate an Environmental Aspects and Impacts Register. The purpose of this is to ensure that all environmental aspects of the company's operations and activities are identified and that the significance of their environmental impacts are assessed so as to permit improvement objectives and the implementation of necessary control measures.

The Environmental Aspects and Impacts Register will be prepared in-line with the following methodology:

1. Identify the environmental aspects of the business. Environmental aspects can be defined as the company's activities, services and operations that have interactions with the environment, such as electricity usage, general waste, etc.
2. Identify how the identified aspects interact with the environment. These interactions are effectively the environmental impacts. Environmental Impacts can be defined as the changes to the environment whether positive or negative that result from the company's activities, services and operations. For example, energy depletion due to electricity usage, consumption of energy when transporting and dealing with waste, etc.
3. Determine the significance of each environmental impact. Significance is based upon the environmental consequence of the impact, and the risk of the impact occurring.
4. Record the findings. All parts of the process are documented, including individual aspects and impacts, impact likelihoods and severities, significance ratings and control measures.

3.3 Purchasing

Michael W Halsall Solicitors Limited aims to purchase products from suppliers who can demonstrate that the products originate from a renewable resource, for example paper products from sustainable forests.

The company will make reasonable enquiries as to the validity of suppliers' environmental claims and check registration with relevant awards (products branded with eco-symbols).

The company will instil in its employees this culture and will endeavour to foster it with both suppliers and clients alike.

3.4 Reuse and Recycling

The heightening awareness of "green" issues at corporate level has led to many employers adopting waste recycling initiatives.

Michael W Halsall Solicitors Limited recognises its duty to reuse or recycle materials, as required by the *Environmental Act 1995*. Therefore, the company will endeavour to ensure that waste materials are collected, segregated and either reused or recycled.

The company appreciates that the reuse and recycling of waste materials is often economical, and hence desirable, due to:

- Lower costs for disposal and thus financial return.
- Conservation of resources.
- Reduction in damage to the environment.
- Reduced pollution.
- Commercial benefits derived from improved employee morale/public image.
- Avoidance of legal proceedings.

The company will, so far as is reasonably practicable, instil in its employees this culture and will endeavour to foster it with both suppliers and clients alike.

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3.5 Training and Competence

Michael W Halsall Solicitors Limited recognises the importance of employee training, technical knowledge, etc. and considers this to be a necessary requirement in the process of environmental risk reduction.

The Director with Responsibility for the Environment is ultimately responsible for identifying and implementing the necessary training requirements.

All employees will be provided with suitable information, instruction and training in relation to their job requirements.

Special emphasis is given to work that the company infrequently undertakes so as to ensure that any risk to the environment is minimised.

Certification and documentation is obtained and recorded as appropriate for the training supplied. Records of both official and "on-the-job" training will be kept by the company and made available for inspection where and when necessary.

3.5.1 Induction Training - Company

Every new employee will receive induction training as soon as possible after commencing work with the company.

Induction training is recognised as an opportunity to convey the company's environmental beliefs and values and to help positively influence the attitudes of all new employees.

A signed record of induction is kept as an acknowledgement that they have understood the content and this is kept in employee personnel files.

3.5.2 Supervision

Supervision (on-the-job training) is undertaken so that any employees who are unfamiliar with a task or a particular item of equipment are mentored and shown accepted ways of working.

All employees who are unsure of how a process works or how equipment is operated are encouraged to refrain from such operations until further instruction is obtained.

Supervision is based on the needs of each individual and will last for as long as is required to ensure that the individual has become competent in that particular task.

3.5.3 Training Records

Training records are maintained in the employee personnel files with copies of certification where relevant.

The company training matrix is updated on a regular basis and used to identify future training requirements.

3.6 Unauthorised Release

Michael W Halsall Solicitors Limited has adopted a responsible attitude towards the control of pollution and the environment.

The company is well aware of the serious implications that unauthorised releases (such as spillages) can have on the environment and subsequently on the business. For example, a failure to adequately control unauthorised releases can not only cause serious harm to the environment but can also put employees and others at risk, cause disruption and downtime reducing the company's efficiency, leading to potentially large fines and clean-up costs.

The company will ensure that its employees are:

- Made aware of the necessary procedures, responses and actions required in the event of an unauthorised release.
- Provided with the appropriate level of instruction and training to enable them to carry out any necessary pollution prevention procedures.

Michael W Halsall Solicitors Limited will follow the pollution prevention and control hierarchy identified below.

3.6.1 Prevention

Michael W Halsall Solicitors Limited will:

- Prevent spillages occurring by ensuring any substances used during the company's undertakings are stored in suitable containers.
- Ensure substance containers are safely stored away from working areas when not required and lids, caps, etc. replaced and secured after use.

3.6.2 Watercourse Protection

Michael W Halsall Solicitors Limited will:

- Prevent any spillage of liquid or solid entering a drainage system during its undertakings.
- Should the need arise provide appropriate measures to protect drains which may lead directly into waterways and sewage plants.

3.6.3 Containment

Michael W Halsall Solicitors Limited will:

- Contain any spillages (should the need arise) to prevent any spilled liquid or solid causing further environmental damage. Responsive containment also ensures that spillages are able to be cleaned up with the minimum amount of effort required, whilst minimising any environmental damage potential.
- Ensure suitable materials are made available during company operations to contain spillages, such as absorbent sheets, granules, etc.

3.6.4 Recovery

Michael W Halsall Solicitors Limited will:

- Recover and properly dispose of any materials, spilled substances, etc.
- Ensure that any 'recovered' substances and contaminated materials generated in the clean-up process are re-cycled/re-used or properly disposed of in accordance with any Local Authority (LA) Guidelines.

3.6.5 Clean-up

Michael W Halsall Solicitors Limited will:

- Should the need arise; ensure any spillages are properly cleaned up.
- Ensure suitable materials are made available during company operations to contain spillages, such as absorbent sheets, granules, etc.

3.6.6 Report and Cooperate

Michael W Halsall Solicitors Limited will:

- Should the need arise ensure larger spills are reported to the appropriate governing body, such as the Environment Agency (EA) or Emergency Services.
- Should the need arise, ensure any spilled liquids or materials that occur on a public highway that are considered to be dangerous or hazardous, and or causing traffic problems, are reported immediately to the Emergency Services.
- Report to the Environment Agency (EA), as soon as is reasonably practicable, if any spillage fails to be controlled using appropriate watercourse protection, containment, etc. procedures, and enters a drain/waterway.

3.7 Vehicles

Michael W Halsall Solicitors Limited operates vehicles for the transportation of employees, materials, etc.

The company recognises that all vehicles on the road today contribute to climate change because their engines burn fuel and therefore produce carbon dioxide (CO₂).

The company carefully considers fuel options when purchasing new vehicles but generally opts for vehicles powered by diesel engines which produce less CO₂.

It is important for the proper and safe functioning of this transport that proper maintenance and care is given to these vehicles so as to not only protect employees and the general public but also to ensure that such vehicles don't cause any unnecessary negative impact on the environment.

The company, so far as is reasonably practicable, requires appropriate employees to:

- Arrange for the regular maintenance and repair of their allotted vehicle at appropriate periods (in line with the manufacturers recommendations).

A 'pool car' is made available to authorised employees who are required to travel on company business. The company adopts a policy whereby the first user of the 'pool car' in any given week will carry out a list of basic vehicle checks to ensure they are satisfied as to the roadworthiness of the vehicle.

- Make every attempt to reduce CO₂ emissions by reducing the workloads placed on the engines of company vehicles. This will involve working closely with drivers of company vehicles to ensure they adopt 'smart driving' techniques to reduce the amount of fuel burnt and so cut down on CO₂ emissions. Such techniques will include:
 - a. Checking that tyres are correctly inflated to minimise resistance when the vehicle is moving. This also extends the life of the tyre.
 - b. Checking that only those items required for the work are carried in vehicles to minimise weight.
 - c. Ensuring that drivers obey the recognised speed limits and never exceed such limits.
 - d. Encouraging appropriate gear selection (e.g. changing up a gear when the rev counter reaches 2000rpm (diesel engines)).
 - e. Encouraging drivers to switch off engines when the vehicle is likely to be at a standstill for more than three (3) minutes or more.

3.8 Wastes

Waste can be loosely defined as:

“...any Substance or object...which the holder discards or intends or is required to discard”.

The *Environmental Protection Act 1990* also gives a definition of Waste as:

“Any Substance which constitutes a scrap material or an effluent or other unwanted surplus Substance arising from the application of any process”, and “Any Substance or article which requires to be disposed of as being broken, worn out, contaminated or otherwise spoiled”.

The *Controlled Wastes Regulations 1992 (as amended)* contain measures related to identifying the types of Waste that can legitimately be regarded as "Household", "Industrial" or "Commercial".

Operations undertaken by Michael W Halsall Solicitors Limited involve the regular handling of waste materials.

There are two (2) main categories of waste covered by environmental legislation. These are controlled waste and hazardous waste.

Michael W Halsall Solicitors Limited recognises how important it is to establish which category of waste is generated during the company's undertakings, as the legal requirements relating to transportation and disposal are different for each.

3.8.1 Controlled Waste

Waste that is not subject to more stringent legal requirements (i.e. all low-hazard waste) is considered to be controlled waste under the *Environmental Protection Act 1990*. This includes all industrial and commercial waste or any similar waste, regardless of the type of premises.

It also includes waste generated by a private household and waste collected by the Local Authority (LA) and that collected by contracted services (e.g. skip collection).

Michael W Halsall Solicitors Limited will ensure that:

- Controlled Wastes are properly and clearly identified.
- Controlled waste is only removed in accordance with the requirements of the Local Authority (LA).
- Waste Transfer Notes (WTNs) are completed and held for at least two (2) years.

3.8.2 Hazardous Waste

The definition of hazardous waste is:

“Waste which has properties that may make it harmful to human health or the environment”.

Examples of hazardous waste include:

- Construction and demolition waste (e.g. wood, glass, plastic, etc.). This could apply during the maintenance, alteration, etc. of the premises.
- Electronic waste (e.g. fluorescent tubes, computer monitors, etc.).
- Industrial waste (e.g. paint, varnish, cleaning cloths, etc.). This could apply during the maintenance, alteration, etc. of the premises.

The *Hazardous Waste (England and Wales) Regulations 2005* requires that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment and in particular:

- Without risk to water, air, soil and plants and animals;
- Without causing a nuisance through noise or odours; and
- Without adversely affecting the countryside or places of special interest.

Michael W Halsall Solicitors Limited is aware that:

- Where hazardous waste is produced at, or removed from, any premises other than exempt premises, the premises must be notified to the Environment Agency (EA).
- If more than 500kg of hazardous waste is generated per year then registration with the Environment Agency (EA) is required.
- Pre-notification to the Environment Agency (EA) is required for individual consignments of hazardous waste.

Where Hazardous Waste is generated by Michael W Halsall Solicitors Limited, where practicable, the company will establish suitable procedures to ensure a register of waste is maintained.

3.8.3 Non Hazardous Waste

Non-hazardous wastes are those wastes not having hazardous properties. To determine whether a waste is hazardous or not, the company will reference the *List of Waste Regulations 2005*.

3.8.4 Hazardous Substances

Hazardous substances are often handled and used by employees of the company.

Michael W Halsall Solicitors Limited recognises that these substances can present considerable risks to the safety and health of employees and can adversely affect the environment if released in an uncontrolled manner.

In line with the requirements of the *Control of Substances Hazardous to Health Regulations 2002*, the company will ensure that exposure to hazardous substances is either prevented or suitably controlled.

Michael W Halsall Solicitors Limited will:

- Investigate safer methodologies for the selection, use and disposal of wastes so as to reduce harm to both people and the environment. This is a part of the company's pollution prevention strategy.
- Undertake COSHH Assessments for those hazardous substances used during the company's operations.

3.8.5 Waste Electrical and Electronic Equipment

Michael W Halsall Solicitors Limited uses a variety of electrical appliances during the course of its day-to-day operations. With this in mind the company recognises the need to comply with the *Waste Electrical and Electronic Equipment Regulations 2006 (WEEE Regulations)*.

Many electrical appliances used by the company contain electrical and electronic components, either for additional functionality or as peripheral parts.

The definition of Electrical and Electronic Equipment (EEE) in the WEEE Regulations is intended to extend only to those products that are dependent on electric currents or electromagnetic fields to work properly, meaning that it is the primary power source. When the electric current is switched off, the product cannot fulfil its main function.

If electricity is used only for control or support functions, the product could be considered to be outside the scope of the WEEE Regulations.

In line with the requirements of the WEEE Regulations, the company will ensure that waste EEE is appropriately segregated and disposed of to allow it to be properly treated and managed so as to contribute towards the environmental performance of all those involved in the lifecycle of EEE.

The company also notes the requirements of the *Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2006* which aims to reduce the waste management problems linked to substances likely to pose risks to health and the environment.

3.8.6 Asbestos Containing Materials

Michael W Halsall Solicitors Limited are aware of the requirements of the *Control of Asbestos Regulations 2012* which require an Asbestos Survey of non-domestic buildings by an accredited Asbestos Surveyor.

Michael W Halsall Solicitors Limited has carried out a programme of sampling and analysis for ACM within 11 The Parks, in-line with the requirements of the *Control of Asbestos Regulations 2012*. The results of which showed that no ACM to be present.

The sampling and analysis was carried out by a United Kingdom Accreditation Service (UKAS) Accredited Consultants.

3.9 Waste Handling

Michael W Halsall Solicitors Limited recognise that it is a criminal offence to keep, treat or dispose of Controlled Waste by a method that may endanger human health or pollute the environment (*Environmental Protection Act 1990*).

Should any waste require removal and subsequent disposal then the company will ensure that certified waste handlers are contracted to undertake the work.

The company appreciates that a "creator" or "handler" of controlled waste has a duty to take all reasonable steps to:

- Prevent any person from knowingly causing or knowingly permitting the unauthorised disposal of waste.
- Keep waste secure so as to prevent escape.
- Transfer the waste only by a registered waste carrier, a licensed contractor or the waste collection authority.
- Ensure that waste transfer notes accompany the consignment.
- Keep adequate records for at least two (2) years from the date of transfer.

Michael W Halsall Solicitors Limited is aware that it is an offence for any person to transport controlled waste in the course of business unless they are a registered carrier (*Environmental Protection (Duty of Care) Regulations 1991*) and take all reasonable steps to ensure that contractors are assessed for competence in this respect.

3.9.1 Waste Storage

Michael W Halsall Solicitors Limited recognise that for wastes that require special attention due to their composition (i.e. wastes that would impose serious danger on those exposed to it), safe removal is imperative.

During its operations, the company may come across such Waste (i.e. Hazardous Waste).

On detection of such waste the company will establish appropriate quarantine procedures whereby suspected Hazardous Waste is carefully segregated and placed in sealed skips/containers.

Arrangements are then made to ensure the safe removal of such waste by a suitably registered and licensed contractor.

3.9.2 Waste Transfer Notes

Michael W Halsall Solicitors Limited will cooperate fully with any licensed waste handler in assuring that Waste Transfer Notes are appropriately completed.

Waste Transfer Notes can be designed to suit each producer/collector of waste, subject to containing the following minimum information:

- Name of the waste producer.
- Type of premises from which the waste originates.
- Name and description of the waste material.
- Method of containment.
- Date and place of transfer.
- To whom the waste was transferred, and in what capacity.
- Any special problems associated with the waste.

4 CHECK

- Make sure that your plan has been fully implemented - 'paperwork' on its own is not a good performance measure.
- Assess how well the risks are being controlled and if you are achieving your aims. In some circumstances formal audits may be useful.
- Investigate the causes of incidents or near misses.



4.1 Accident and Incident Management

Michael W Halsall Solicitors Limited will ensure that appropriate systems are in place to manage environmental incidents during the company's undertakings.

The Environment Agency (EA) identifies numerous incidents as reportable, including:

- Damage or danger to the natural environment;
- Pollution to water or land;
- Fish in distress or dead fish;
- Watercourse blocked by vehicle or fallen tree causing risk of flooding;
- Illegal dumping of hazardous waste or large amounts of industrial waste; and
- Unusual drop in river flow, collapsed or badly damaged river or canal banks, etc.

4.1.1 Reporting

Michael W Halsall Solicitors Limited requires employees, contractors, visitors, etc. to report to them any environmental incident occurring during the company's operations.

Michael W Halsall Solicitors Limited will:

- Should the need arise; ensure larger spills are reported to the appropriate governing body, such as the Environment Agency (EA) or Emergency Services.
- Should the need arise, ensure any spilled liquids or materials that occur on a public highway that are considered to be dangerous or hazardous, and or causing traffic problems, are reported immediately to the Emergency Services.
- Report to the EA any spillage which fails to be controlled using appropriate watercourse protection, containment, etc. procedures, and enters a drain/waterway. The EA will be notified of any such incident via its 'incident hotline'.

4.1.2 Investigating

Michael W Halsall Solicitors Limited will ensure that all environmental incidents are investigated. The nature and outcome of an incident will determine whether a formal documented investigation is warranted.

Michael W Halsall Solicitors Limited will identify underlying or root causes and where lessons to be learnt are identified, the company will ensure that these are fed back to employees so as to reduce the possibility of a recurrence.

4.2 Environmental Inspections and Monitoring

Michael W Halsall Solicitors Limited will undertake regular environmental, as well as health and safety inspections, and are aware of their importance in:

- Identifying workplace hazards.
- Identifying hazardous acts and conditions.
- Helping prevent loss and harm to the environment.
- Promoting workforce consultation with management.
- Reinforcing management commitment to the environment.
- Identifying standards on which future environmental performance can be measured.

The company may undertake informal as well as formal inspections. Formal inspections are preferred however, as they provide a record of the process and can assist in obtaining statistics to use in a programme of improvement. The inspections may be regular or random in frequency and are undertaken with respect to the level of risk associated with the type of work being undertaken. The company documents formal inspections against a standard inspection checklist to allow for performance comparisons to be made.

Competent persons are selected to carry out inspections and as such may be selected from within the company or be from an external source, such as a MD Safety Management Ltd. However, the company encourage the involvement of the entire workforce during this process, whether the inspection is undertaken by an internal or external source, as this increases ownership and understanding.

Formal inspections will, so far as is reasonably practicable, include an examination of the environmental arrangements in place, including, but not limited to:

1. Documentation

This can include policies, risk assessments, method statements, permits to work, examination records and training records.

2. Workplace

This can include the physical arrangements established for the work. Essentially a hazard spotting exercise it will identify areas where there are potential breaches of environmental legislation.

3. Behaviour

This can include an observation of how people are working and can provide an insight into the effectiveness of training programmes and individual and group attitudes to the environment.

The results of the inspection process will include:

1. Items requiring immediate attention

Where conditions exist as to present a serious risk to the environment then immediate action may be required to control it.

2. Items requiring attention in a defined timescale

Depending on the observation, a specific date may be set by which the remedial action should be taken.

As part of the inspection process, the company will also check to see whether any requirements identified during any previous inspections have been actioned and if they have been, have they been completed to an acceptable standard and within the timescale specified.

As well as to identify any unsafe or unacceptable acts and conditions, the company may use the process of inspection to promote and reward good practice.

5 ACT

Review your performance

- Learn from environmental incidents, near-misses and relevant experience, other organisations, etc.
- Revisit plans, policies and procedures to see if they need updating.

Take action on the lessons learned, including those from audit and inspection reports



6.1 Reviewing Performance

Michael W Halsall Solicitors Limited learns from all relevant experience and applies the lessons learnt.

There is a systematic review of performance based on data from monitoring and from independent audits of the Environmental Management System.

There is a strong commitment to continuous improvement involving the constant development of policies, systems and techniques of risk control.

Performance is assessed by:

- Reference to key performance indicators.
- Comparison with the performance of business competitors and best practice, irrespective of employment sector.
- Performance is also often recorded in annual reports.

It is the duty of the Director with Responsibility for the Environment to arrange for the policy to be reviewed as often as appropriate and as a minimum at least once a year.

Circumstances, which may cause the policy to be reviewed, could include:

- New work practices, which can cause a change in the nature of company operations and can, lead to changes in training requirements.
- New hazards in the workplace that require addition to established risk control measures. This in turn may lead to additional responsibilities and duties of employees being identified.
- Working experience that requires addition to the old policy.
- New legislation requirements, which require addition to the policy and may require the identification of further duties within the company.
- Company re-organisation that can lead to the redefinition of duties and responsibilities.

Monitoring of the policy is the duty of the Environmental Coordinator.

Observation of the workplace, feedback from employees, noting any increase in environmental incidents, etc. will be used by the Environmental Coordinator as important indicators to monitor the success of the policy.

Each employee is made aware of the location of the company's Environmental Policy. Each employee is given a suitable timescale in which to familiarise themselves with the policy so as to ensure that they have an understanding and appreciation of the duties and arrangements contained within.

The Environmental Coordinator is available to answer queries or issues that any employee may have regarding its contents. Where clarification is required then the company may also enlist the services of MD Safety Management Ltd to ensure that the query can be answered in the most effective way that can be most easily understood.

After familiarising themselves with the relevant parts of the Environment Policy, employees are required to sign and date the *Safety, Health and Environmental Documents Declarations Register* (held with Neville Wall (Environmental Coordinator)).

When amendments are made to the policy employees are informed of the change in issue status and are given the opportunity to acquaint themselves with the changes made and any implications arising out of them. Subsequently employees are required, once again, to sign and date the *Safety, Health and Environmental Documents Declarations Register*.

5.2 Auditing

All control systems tend to deteriorate over time or become obsolete as a result of change.

Auditing supports monitoring by providing management with information on how effectively plans and the components of the Environmental Management System are being implemented.

It should also provide a check on the adequacy and effectiveness of the management arrangements and risk control systems.

Auditing is an essential element of an Environmental Management System, and is no substitute for the other essential parts of the system. Michael W Halsall Solicitors Limited understands that such management systems need to be managed on a day-to-day basis and that regular audits need to take place to ensure their success.

The aims of auditing are to establish that:

- Appropriate management arrangements are in place;
- Adequate risk control systems exist, are implemented, and consistent with the company's Environmental Aspects and Impacts Register; and
- Appropriate workplace precautions are in place.

Michael W Halsall Solicitors Limited regularly audits its Environmental Management System.

The auditing process can involve:

- Interviews with relevant members of staff.
- Consideration of environmental incident statistics.
- Experiences and errors identified during internal audits and inspections.
- Revision of plans, policies and procedures, etc.
- Observations of the premises layout, physical processes, hazards, etc.

In conjunction with our Environmental Advisors (MD Safety Management Ltd), the company's Environment Policy is reviewed and updated at least annually to reflect changes in the company as well as environmental legislation, and also industry best practice.

APPENDIX 1 – ENVIRONMENTAL INFORMATION SOURCES

CONTACT	DETAILS
Environment Agency (EA) North West Regional Office	North West Regional Office, PO Box 12, Richard Fairclough House, Knutsford Road, Latchford, Warrington, Cheshire, WA4 1HT
EA North West Regional Office Telephone	08708 506506 (Mon-Fri 8-6)
EA Incident Hotline	0800 807060 (Freephone - 24 Hour)
EA Hazardous Waste Registration Telephone	08708 502 858 (Mon-Fri 9 - 5)
EA Website	www.environment-agency.gov.uk
EA E-mail	enquiries@environment-agency.gov.uk
MD Safety Management Ltd Telephone	0844 335 1499
MD Safety Management Ltd E-mail	www.info@mdsm.org.uk
MD Safety Management Ltd Website	www.mdsm.org.uk
Department for Environment Food and Rural Affairs Website	www.defra.gov.uk
Carbon Trust Website	www.carbontrust.co.uk
Water UK Website	www.water.org.uk
Energy Saving Trust Website	www.energysavingtrust.org.uk

APPENDIX 2 - ENVIRONMENTAL LEGISLATION

The table below contains a list of the current (at date of issue) environmental legislation affecting the operations of the company. The table also identifies the relevant identification number along with the subject or purpose of the legislation.

Those items of legislation identified below should be reflected in the company's environmental arrangements (Environment Policy) and catered for within the company's risk control systems (Environmental Aspects and Impacts Register).

Name of Legislation	No.	Subject
Environmental Protection Act 1990	1990 c. 43	The act introduces a system of integrated pollution control for the disposal of wastes to land, water and air.
Clean Air Act 199	1993 c. 11	The act introduced a wide range of new regulations, including those which control smoke emissions.
Noise Act 1996	1996 c. 37	The act was introduced to outlaw those who have little or no respect for peace and quiet from 11.00 to 07.00.
Water Resources Act 1991	1991 c. 57	The act was introduced to regulate water resources, water quality and pollution, and flood defence.
Climate Change Levy	-	The CCL is a tax on energy delivered to non-domestic users in the UK. Its aim is to provide an incentive to increase energy efficiency and to reduce carbon emissions.
Controlled Waste (England and Wales) Regulations 2012	588	Provides classification of wastes (household, industrial or commercial waste) and lists the types of waste for which local authorities may make a charge for collection and disposal.
Environmental Damage (Prevention and Remediation) Regulations 2009	153	Imposes obligations on businesses, requiring them to prevent, limit or remediate environmental damage caused by their operations.

Name of Legislation	No.	Subject
Environmental Protection (Duty of Care) Regulations 1991	2839	Imposes a duty of care on anyone who imports, produces, carries, treats or disposes of waste. Measures are required to prevent another person illegally treating, keeping, depositing or otherwise disposing of waste. Measures are also required to prevent the escape of waste, and to ensure that waste is only transferred to an “authorised person” and that the transfer is accompanied by a written description of the waste.
Hazardous Waste (England and Wales) Regulations 2005	894	Outline the controls in place for those producing, transporting and disposing of hazardous waste, including tracking the movement of hazardous waste.
List of Waste Regulations 2005	895	Provides “the List of Wastes” used to classify wastes (European Waste Catalogue).
Waste Electrical and Electronic Equipment Regulations 2013	3113	Aims to minimise the impact of electrical and electronic goods on the environment by increasing the amount of waste electrical and electronic equipment re-use and recycling and reducing the amount of waste electrical and electronic equipment going to landfill.



MICHAEL W HALSALL

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MD Safety Management Ltd is a Health and Safety Consultancy with over 30 years' experience in Nuclear, Chemical, Construction, Retail, Leisure and Environmental Sectors we provide tailored and cost-effective services to our varied Client-base.

MD Safety Management Ltd is working with Michael W Halsall Solicitors Limited in order to implement a Safety, Health and Environmental Management System and ensure that this is monitored and updated to comply with both Health and Safety and Environmental Legislation.

