



Environmental Management Policy

Originator:	Policy and Strategy Team
Approval date:	February 2020
Review date:	February 2023

1	Introduction
1.1	As responsible business and employer, Carroll Telecoms will examine every aspect of its core business activities to identify opportunities to reduce waste / reuse materials and minimize, where possible, any negative environmental impact.
1.2	<p>This Policy covers the waste creation, disposal and recycling opportunities that are created by Carroll Telecoms core business activities of:</p> <ul style="list-style-type: none"> • Installation of network cables contracts including fibre optic cables • Installation of poles for overhead distribution of network lines • Traffic management initiatives • Civil Maintenance works • Back office and corporate functions
1.3	The Policy does not cover the waste or recycling obligations of customers for whom Carroll Telecoms provides services, although every effort will be made to work in partnership with clients at the point of service to promote responsible waste management and recycling regimes.
1.4	The Policy also covers the wider activities Carroll Telecoms engage in to support the upkeep and delivery of its structured environmental management system that meets ISO 14001 criteria and assessment.
1.5	<p>In operating the Policy Carroll Telecoms will ensure it meets the requirements of the relevant legislation and regulatory codes as follows:</p> <ul style="list-style-type: none"> • Waste Electrical and Electronic Equipment (WEEE) 2013 • The Waste (England and Wales) Regulations (WR) 2011 • Environmental Permitting Regulations 2010 • Environmental Damage Regulations 2009 • The Waste Framework Directive (WFD) 2008 • Hazardous Waste Regulations 2005

	<ul style="list-style-type: none"> • List of Waste Regulations 2005 • Waste Transfer Regulations 2005 • Control of Substances Hazardous to Health (COSHH) 2002 as amended • Control of Pollution (Oil Storage Regulations) 2001 • Environmental Protection (Duty of Care) Regulations 1991 • Environmental Protection Act 1990 <p>1.6 Access and Communication</p> <p>1.6.1 Carroll Telecoms is committed to ensuring that the services it provides are accessible to everyone. Carroll Telecoms 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 Carroll Telecoms or use its services.</p> <p>1.7 Equality, Diversity and Human Rights</p> <p>1.7.1 Carroll Telecoms 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, Transgender , Sexual Orientation, Pregnancy and Maternity, Marriage and Civil Partnership, Religion and/or Belief.</p> <p>1.7.2 Carroll Telecoms 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.</p> <p>1.7.3 Carroll Telecoms 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 Carroll Telecoms works, will adhere to the central principles of the Human Rights Act (1998).</p>
2	Statement of Intent
2.3	<p>Carroll Telecoms is committed to reducing 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:</p> <ul style="list-style-type: none"> • Planning environmental objectives, targets and programmes • Implementing processes • Checking and auditing of activities • Reviewing and delivering continuous improvement <p>2.2 In operating this Policy, Carroll Telecoms 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 its operations

	<ul style="list-style-type: none"> • Strive to make efficient use of energy and materials, including substitution FOR renewable resources, where possible • 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-off in a safe and responsible manner • Seek to reduce the volume of fuel consumption by its fleet of vehicles • Seek to reduce harmful emissions wherever possible • Reduce energy and materials (including water use) consumption in Carroll Telecoms offices • Reduce its Carbon Footprint • Promote environmental awareness to employees, sub-contractors and customers • Ensure that the Policy is brought to the attention of all employees
2.3	In operating the Environmental Management Policy, Carroll Telecoms will at all times strive to achieve value for money and best practice by applying the principles of waste management.
2.4	Carroll Telecoms will ensure that all actions it undertakes to implement the Policy have due regard to the health and safety considerations for its office staff, operatives and customers. This will include complying with all regulations surrounding the transfer and disposal of materials classed as 'hazardous waste'.
2.5	Carroll Telecoms will also maintain an environmental 'aspects and impacts register' of all of its core activities. The register will help Carroll Telecoms identify the most significant activities where there is an interaction with the environment, whether that is the physical environment or with people, to maximise positive impacts and to mitigate and control any negative impacts.
2.6	Carroll Telecoms will have robust practices in place to mitigate potential negative impacts which may be caused by the use or storage of substances and materials that have potential to cause damage to the environment.
2.7	In operating this Policy, Carroll Telecoms will ensure a safe-working environment for its employees at all times as required by the Health and Safety Executive (HSE) guidelines and other relevant legislation.

3	Policy
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3.1	Outlined below are the ways in which Carroll Telecoms will create efficiencies' and reduce any negative environmental impacts that may result from its business activities:
3.2	Reducing Emissions
3.2.1	Carroll Telecoms is also committed to reducing the negative environmental impacts associated with vehicle emissions. Carroll Telecoms will achieve this aim by: <ul style="list-style-type: none"> • Where possible, employing local labour to reduce the amount of 'travel to work' emissions for its staff • Implementation of systems for Carroll Telecoms fleet vehicles, ensuring efficient route planning and reducing unnecessary journeys

- Promoting and encourage eco-driving style (set of behaviours) to improve fuel efficiency by minimising fuel usage

3.2.2 Carroll Telecoms will also reduce carbon emissions through the use of a GPS (Global Positioning System) tracker devices in its fleet vehicles, which allows it to access complete diagnostics of all journeys undertaken. Carroll Telecoms will use this information to reduce inefficiencies in business journeys and educate operatives on the most cost effective driving styles to reduce fuel consumption.

3.2.3 Carroll Telecoms uses a locally based 'waste contractor' partner which is ideally situated to process trade waste and thereby reduce the distance the trade vehicles have to travel.

3.3 **Recycling of Office and Commercial Waste**

3.3.1 Carroll Telecoms recognises it has legal responsibility to comply with the Environmental Protection Act 1990, Waste (England and Wales) Regulations (WR) 2011 and other relevant legislation. Throughout its core business operations, Carroll Telecoms will strive to reduce waste through various waste management approaches i.e.:

- Reduce the amount of waste it produces to a minimum
- Re-use and recycle, wherever reasonably practicable
- Recover through the use of treatments and recovery processes
- Responsible disposal of waste, including waste segregation and arrange for any unused British Telecommunications (BT) Equipment or materials that was provided for the work onsite to be returned to BT, as required

3.3.2 Carroll Telecoms, in liaison with its preferred waste processing contractors will work towards developing recording mechanisms, which provide detailed reports on all commercial waste that is recycled.

3.3.3 Carroll Telecoms will also endeavour to provide reports on the tonnage of commercial waste recycled across all core business activities.

3.3.4 Carroll Telecoms aims to be amongst the top companies across all sectors for recycling and to consistently exceed Waste and Resources Action Programme (WRAP) best practice targets of between 70% and 80% for recycling of trade waste materials.

3.3.5 Carroll Telecoms 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.

3.3.6 Carroll Telecoms will ensure that all underground cable installation/maintenance works are carried out in line the client's 'Risk Assessment Report' and in accordance with 'safe system of working' to prevent contamination of underground water sources (man-made and natural). The basic elements of a safe system of work will involve:

- Use of plans to aid location of underground pipe work, power cables and other services before commencing the work

	<ul style="list-style-type: none"> • Use of cable locating devices to determine and identify as accurately as possible the position of underground pipe work and cables in the proposed work area. • Use of safe excavation and digging practices so it doesn't interfere with underground pipe work and cables
3.3.7	Carroll Telecoms will, where suitable, reuse the excavated soil and rocks for backfilling installed and/or exposed underground cables and pipe work to minimise negative environmental impact.
3.3.8	If underground work is carried out near or on the motor ways, Carroll Telecoms will observe any specific requirements made by the Department of Transport
3.4	The 'Aspects and Impacts' Register
3.4.1	Carroll Telecoms keeps 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.
3.4.2	Each area of activity is then given a risk factor to determine its priority for immediate action through the use of control measures or provide a target for improvement based on: <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 Carroll Telecoms overall activities
3.5	Actions to Reuse Materials
3.5.1	Carroll Telecoms will, wherever possible, have arrangements in place for recovery, recycling and disposal of materials and equipment supplied for its core business use that has become electrical waste in line with the WEEE Regulations 2013.
3.5.2	Carroll Telecoms will also ensure that it procures equipment and materials that complies with relevant UK legislations and/or standards.
3.6	Substances Hazardous to Health
3.6.1	As a responsible employer, Carroll Telecoms will aim to provide a safe working environment for its operatives 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, Carroll Telecoms will follow the good practice guidelines produced by the Health and Safety Executive as follows: <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

	<ul style="list-style-type: none"> • 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 <p>3.6.2 In addition to the above, Carroll Telecoms 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.</p> <p>3.7 Management of Potential Pollutants</p> <p>3.7.1 In line with its requirements under the Environmental Damage Regulations 2009, Carroll Telecoms will carry out risk assessments for all activities and locations where there is potential for materials used to cause environmental damage.</p> <p>3.7.2 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 • 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 • Ensure emergency procedures are in place for dealing with spills or leakages of potential pollutants
4	Implementation
4.1	All Carroll Telecoms employees have a responsibility for being aware of and implementing the Carroll Telecoms Environmental Management Policy.
4.2	The Health & Safety Team and Quality & Assurance Teams 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 that underpin the operation of this Policy will be published quarterly in the internal Performance Management System :</p> <ul style="list-style-type: none"> • Percentage of reduction in electricity consumption in Carroll Telecoms offices • Achieve 85 percent for office waste recycling

5.2	<ul style="list-style-type: none"> Contribute to the an increase in percentage in the volume of wastepaper recycling year on year Percentage in reduction in fuel use consumed by Carroll Telecoms vehicles Contribute to the percentage in reduction in total carbon footprint (CO2) emissions from office and fleet use by 40% in comparison with the base year's data <p>The above targets will be reviewed and amended on an annual basis, based on actual performance.</p>		
6	Review		
6.1	The Policy will be reviewed once every three years from the date of the Managing Director - Carroll Telecoms approval or sooner if required by the introduction of new legislation, regulation or if necessitated by changes to Carroll Telecoms working practices / as a result of system audits.		
7	Equality Impact Assessment		
7.1	Was a full Equality Impact Assessment (EIA) required?	No	
7.2	When was EIA conducted and by who?	The EIA relevant test was conducted by the Policy Writer and Policy and Strategy Manager on 17 th January 2020	
7.3	Results of EIA	The EIA relevant test did not reveal any differential impacts for any group of the people with protected characteristics.	
8	Scheme of Delegation		
8.1	Responsible officer for approving and monitoring implementation of the Policy and any amendments to it	Managing Director- Carroll Telecoms	
8.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Managing Director- Carroll Telecoms	
8.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Managing Director- Carroll Telecoms	
10	Amendment Log		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
Not Applicable-this is the first version of	Not applicable	See section 6	Not Applicable

the Policy for Carroll Telecoms- 04/02/2020			
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