




DLG Property

Environmental Management System Manual

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V1.2	20/05/20	9.3 Management Review – frequency of meetings changed from biannual to annual at a minimum.	WB
V1.3	09/11/20	1.2 Interested Parties – Addition of LA Clean Air Zones and LA aspirations on net zero carbon emissions 1.3 Scope – Deletion of Fenchurch St and Gracechurch St and addition of Minster Court 1.4 Risks & Opportunities – Rewritten in the main 2.1 Leadership Team – Updated team structure 3.3 (and throughout doc) – all references to site based EMPs amended to Consolidated EMP. 3.3 Change to EMP key (categories and colour code) 7.0 (and throughout doc) Deletion of all references to Charlton House and Aggora	WB
V1.4	23/09/21	1.3 Scope – Removal of Croydon, Ipswich, Leeds Headrow, Manchester and Watford from scope of EMS. 2.2 Roles, Responsibilities & Authorities (and throughout doc)– All references to Compliance & CSR Manager removed and replaced with DLG Compliance Specialist. Role of DLG Compliance Specialist and EMS Administrator combined. 2.3 Policy Statement – Updated. 3.1 – 10.0 Removal of all sections detailing ‘related documents’ to avoid repetition. 7.0 Operation Control & 8.0 Emergency Response – Reference to Property Process ISO/2021/DLGPP 01- Vehicle Leaks, added. 9.1 Monitoring, Measurement & Analysis – Deletion and subsequent insertion of new text to confirm which waste materials are covered by targets. Insertion of new text on project waste. 9.2 Internal Auditing & Evaluation & 10.0 Non-conformity & Corrective Action – Reference added to new ‘Consolidated Audit Action Plan’.	WB
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1.0 INTRODUCTION

1.1 Organisational Context

Direct Line Group Limited (DLG) is a leading British provider of personal insurance for homes and motor vehicles and additionally, commercial businesses through their brands, NIG, Privilege, Direct Line for Business and Churchill, and through partner channels with RBS and NatWest.

The **DLG Property Team** manages the DLG commercial office portfolio in the UK. Its function is to enable DLG colleagues to operate in a safe and varied environment, which allows them to be creative and productive for the business. Through our office design and layout, we aim to maximise the opportunities we offer for colleagues and teams to collaborate, innovate, and work at their best.

The Property Team operate a Total Facilities Management (TFM) delivery model, delivering both hard and soft services for the business, comprising:

- Estate Management
- Building and Asset Planned Preventative Maintenance (PPM)
- Reactive Maintenance
- Mechanical, Electrical and Fabric works
- Refurbishment
- Energy, Carbon and Water Management
- Cleaning
- Concierge
- Security
- Waste Management
- Window Cleaning
- Pest Control
- Grounds Maintenance
- Health & Safety Management
- Environmental Management

The Property Team operates an 'Intelligent Client' model, which manages the performance of our various TFM Suppliers and provides assurance to the business on compliance with our own minimum standards, and our statutory duties.

1.2 Interested Parties

Interested Party	Needs & Expectations	DLG Property Obligations
Direct Line Group	<ul style="list-style-type: none">- Being recognised as a trusted, responsible company- Environmental and sustainability issues to be considered in all operations and business activities- Reduction in carbon footprint- Efficient use of resources- Environmental and sustainability criteria are considered in the procurement of goods and services- Community investment programme	<ul style="list-style-type: none">- Responsible environmental management, operating within legal compliance parameters at a minimum- To reduce the Group Property carbon footprint- To reduce and manage the office wastes in a responsible manner- Carbon Disclosure Project reporting- Achieve effective resource management

Interested Party	Needs & Expectations	DLG Property Obligations
		<ul style="list-style-type: none"> - To embed environmental and sustainability criteria into our everyday business - Support to the network of Community and Social Committees (CSC)
TFM Team – Mainstay & Ascot	<ul style="list-style-type: none"> - Co-operation - Collaboration and teamwork - Clear communication - Shared responsibility - Mutual benefit - DLG Ascot FM Hard Services Agreement - DLG Contract with Mainstay- Schedule 8 	<ul style="list-style-type: none"> - Clearly identified roles & responsibilities to deliver effective environmental risk management & compliance
Our people	<ul style="list-style-type: none"> - Capable, skilled, engaged - Rewarded - Diverse and inclusive - Given training, learning & development opportunities 	<ul style="list-style-type: none"> - Provision of training and communication to enable achievement of aims and objectives of environmental policy and environmental management plans.
Suppliers	<ul style="list-style-type: none"> - Co-operation - Collaboration and teamwork - Mutual benefit - Prompt payment 	<ul style="list-style-type: none"> - Communication of applicable environmental requirements - Collaboration to deliver on effective resource management
Landlords	<ul style="list-style-type: none"> - Sites to be operated in line with requirements specified within the Lease agreements 	<ul style="list-style-type: none"> - Site Leases - Any applicable operational constraints to safeguard the environment.
Local Communities	<ul style="list-style-type: none"> - Minimise disturbance 	<ul style="list-style-type: none"> - Operate sympathetically to local neighbours and avoid creating environmental nuisance
Shareholders	<ul style="list-style-type: none"> - Growth - Return on investment - Good corporate governance, including environmental management and corporate social responsibility - Compliance 	<ul style="list-style-type: none"> - Responsible environmental management, operating within legal compliance parameters at a minimum - Disclosure on carbon emissions - Take part in Environmental Social and Governance report and disclosure
Environmental Regulatory Bodies/ Water Authorities	<ul style="list-style-type: none"> - Pollution prevention - Evidence of regulatory compliance - Co-operation 	<ul style="list-style-type: none"> - Clearly identified legal & other compliance requirements and evidence of conformity - Effective environmental risk management - Regular inspections & review
Local Authorities	<ul style="list-style-type: none"> - Net Zero carbon emissions - Clean Air Zones 	<ul style="list-style-type: none"> - To operate in accordance with / support the achievement of LA targets on net zero carbon and clean air zones.

1.3 Scope of Environmental Management System

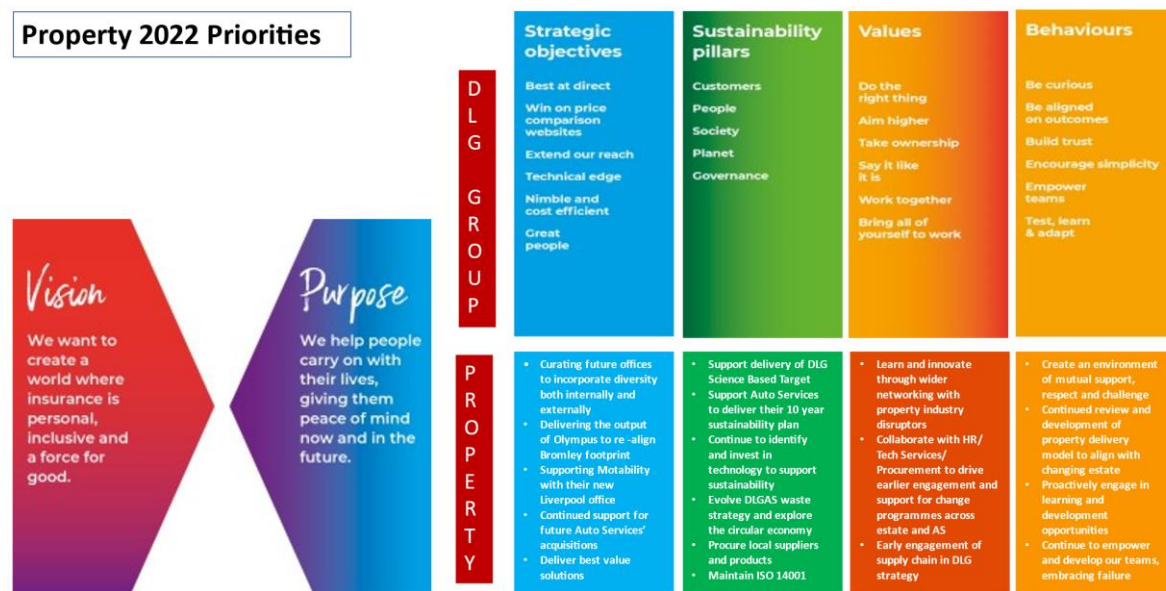
The defined scope of the EMS covers the services delivered by DLG Property across its commercial office portfolio in the UK.

Sites covered by the EMS:

Site Name	Address
Bristol	The Core, 40 St Thomas Street, Bristol, BS1 6JX
Bromley	Churchill Court, Westmoreland Road, Bromley, BR1 1DP
Doncaster	The Mere, Lakeside Boulevard, Doncaster, DN4 5PL
Farnham	Waverley House, Farnham Business Park, Weydon Lane, Surrey GU9 8QT
Glasgow	14-18 Cadogan Street, Glasgow, G2 6QN
Leeds Wharf	The Wharf, Neville Street, Leeds Yorkshire, LS1 4AZ

1.4 Risks & Opportunities

DLG Property have a strategy cascaded from the overarching company objectives.



1.4.1 Climate Change

The key environmental risk to the ongoing success of the business is seen as climate change. Climate change is predicted to have a profound effect on the environment and the health and prosperity of individuals and nations around the world. DLG recognises its contribution to climate change and in response to the climate crisis has actively engaged with Carbon Intelligence to set climate goals aligned with the Science Based Targets initiative (SBTi). DLG commits to set a long-term science-based target to reach net-zero value chain GHGs emissions by no later than 2050 in line with the SBTi Net-Zero Standard, submit it for SBTi validation and publish it, all within a maximum of 24 months. By committing to set a net-zero target, DLG also acknowledges that it will be part of the Business Ambition for 1.5°C campaign. Our company will also join the Race to Zero campaign.

The Property portfolio is a significant contributor to the carbon footprint of DLG, from the direct use of energy to heat the buildings; the indirect impacts of generation of electricity for use in the buildings;

the embodied energy used to create the building fabric; to the impacts arising from the commuting of staff to and from their homes to the place of work. Consideration of these factors will be at the heart of the Property strategy going forward. Within the road map to reducing Scope 1 and 2 emissions within the offices there is a plan to reduce office natural gas use by switching to low carbon heating solutions (heat pumps, district heating, bio-methane etc.) and introduce low GWP refrigerants.

DLG will also need to be cognisant of the goals and aspirations of stakeholder organisations in setting its carbon targets, particularly in relation to the wishes of shareholders, but also the likes of Local Authorities/ Councils who will have their own emerging goals on limiting impacts within their own jurisdictions.

1.4.2 New Ways of Working

The legacy of Covid-19 has profoundly affected the use of DLG Properties.

The change in working practices offers the opportunity to review the property portfolio and create a business going forward designed along more agile working practices and a mixed model of working between home and the office. A corresponding rationalisation of the estate and reduction in commuting will deliver significant direct carbon savings.

It is recognised however, that staff working from home create carbon emissions that are not currently accounted for in the current models. Homes can be energy inefficient and often the need to heat whole households for a single working occupant can lead to greater comparative carbon emissions than the equivalent for office working.

Covid-19 had the unfortunate consequence of increasing single car journeys and the avoidance of public transport. Although restrictions have now been lifted there has been a migration away from public transport and pre-pandemic behaviours have not been reset. This not only has impacts upon staff commuting but also on inter-office travel, the latter of which is currently captured by targets within the EMS. The potential growth in inter-office single car journeys will need to be closely monitored and significant efforts made to continue to target carbon reductions in this area.

DLG are aware of these complications and will seek to address these on its journey to achieving net zero carbon emissions.

1.4.3. New Operating Model

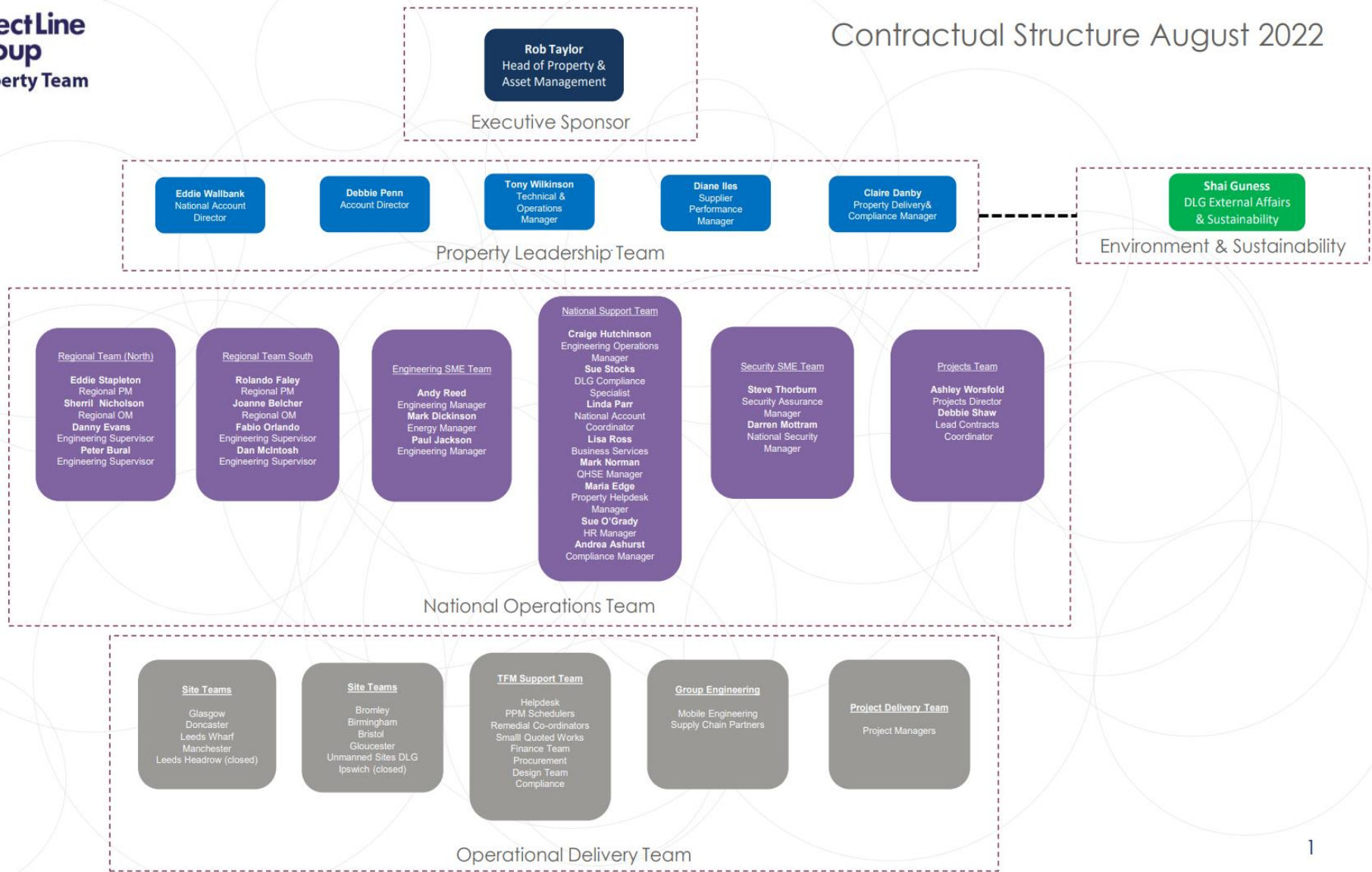
With the adoption of an agile, hybrid working model there has been a reduction in the amount of office accommodation required to support our staff. DLG has taken the opportunity to undertake a strategic review of its estate and closed The Headrow in Leeds and relocated staff to its main office at Leeds Wharf and our Ipswich office has been closed. The office in Livery Street Birmingham has condensed from six floors to one and a floor has been sub-let at The Core in Bristol. In addition, a plan for consolidation of the London and Bromley estates is also being considered and part implemented. With all estate rationalisation the environmental credentials of the building are reviewed, and the location of new buildings is being influenced by the energy performance of the existing and proposed sites. The environmental risks are also considered, and this has influenced our generator strategy.

We are actively adopting a re-use approach to our surplus office furniture and redundant mechanical and electrical equipment throughout the estate. To date office furniture from the Leeds Headrow, Doncaster and Bromley site has been deployed across the estate. Chairs have been sent out to staff working from home and the Auto Services estate have been the beneficiaries of a substantial amount of furniture.

2.0 LEADERSHIP

2.1 Leadership Team

Key DLG Property individuals with accountability and responsibility for the effective implementation of the EMS and the achievement of continual environmental improvement are:



2.2 Roles, Responsibilities & Authorities

The key roles and responsibilities to successfully implement and maintain the EMS, and to achieve continual improvement in environmental performance are summarised as follows:

2.2.1 DLG Head of Property

Responsible for ensuring:

- That the Environmental Policy Statement is reviewed and updated every year, to ensure it remains suitable to DLG Property needs and reflects the latest developments in the environmental field.
- Adequate resources (people, time, money) are allocated to allow the Property Delivery Manager and EMS Administrator to successfully implement and maintain the EMS, and to achieve continual improvement in environmental performance.
- Their presence at the EMS Management Review Meetings, to stay abreast of developments and to support the resolution of any barriers to improvement.

2.2.2 DLG Property Delivery and Compliance Manager

Responsible for ensuring:

- All activities within DLG Property have been assessed for potential impact on the environment and recorded in the DLG Assessment of Environmental Aspects & Impacts Forms.
- Compliance obligations are kept fully up-to-date and that all activities are planned in accordance with these obligations.
- Adequate effort and resources are allocated to enable the objectives set within the Consolidated Environmental Management Plan (EMP) to be achieved.
- All DLG Property staff and key individuals from the TFM suppliers are made aware of the relevant requirements of the EMS and are competent to undertake tasks allocated to them.
- That any communications received from external sources, particularly environmental complaints, are dealt with appropriately.
- That all centralised documents pertaining to the EMS are controlled effectively and that environmentally related records are kept and stored in the appropriate locations.
- The development of operational control procedures to minimise the potential for environmental impacts, that meet the objectives set out within the EMS.
- The development of emergency response procedures to prevent and control environmental impacts arising from abnormal, accident and emergency situations which may arise.
- Activities are monitored, measured and analysed to limit potential impacts upon the environment; to achieve legal compliance; and to continually improve environmental performance.
- That internal audits are scheduled and undertaken in a timely and effective manner, by competent persons.
- That the EMS Management Review Meetings are held periodically as planned, to drive the continual improvement in environmental performance.
- That all non-conformances are corrected within a reasonable timescale.
- That all opportunities for improvement are reviewed and a decision made as to whether to act on the recommendation.

2.2.3 DLG Compliance Specialist

Responsible for ensuring:

- A monthly review (evidence based) of progress against the actions detailed in the Audit Action Plans and Consolidated EMP is undertaken, and progress documented within the respective documents.
- All controlled documents are updated as required, with the nature of updates communicated to relevant personnel.
- Minutes are recorded for the EMS Management Review Meetings.

2.2.4 DLG Property Managers

Responsible for ensuring:

- That all members of the TFM team and sub-contractors operating within their sites are aware of the relevant significant environmental aspects arising from their activities, and any applicable constraints on their undertakings arising from compliance obligations.
- That all members of the TFM team and sub-contractors undertake their tasks in accordance with the objectives set out within the Consolidated EMP.
- Efforts are focused on achieving the objectives set out in the Consolidated EMP and for reporting back to the Property Delivery and Compliance Manager any significant barriers to their achievement within the specified timescales.
- That all members of the TFM Team receive timely environmental training.
- That any communications received from external sources on environmental issues are dealt with appropriately. Minor complaints can be dealt with locally by the Regional PMs. Complaints of a more significant nature will be forwarded to the Property Delivery and Compliance Manager for resolution.
- That environmentally related records are kept and stored in the appropriate locations.
- That the environmental operational control procedures/ processes are effectively implemented and adhered to on their sites, to minimise the potential for environmental impacts.
- That any environmental emergency response procedures are adhered to on their sites and are rehearsed at agreed intervals, to prevent and control potential environmental impacts arising from abnormal, accident and emergency situations.
- That performance data is reported as required to the Property Delivery and Compliance Manager, to support the achievement of environmental objectives.
- That internal audits are supported with the provision of timely and accurate information.
- Their presence at the EMS Management Review meetings, to support the implementation and development of the EMS, and the achievement of continual improvement.
- That all non-conformances raised within their Regions and within their authority to influence, are corrected within an agreed timescale.

2.2.5 TFM Suppliers

Responsible for ensuring:

- Delivery of the contracted services in line with the requirements stipulated within the EMS.

2.3 Group Property Environmental Policy Statement



Introduction

Direct Line Group is committed to operating our business responsibly, with a view to protecting and enhancing the natural environment in which we operate. We aim to deliver a sustainable business model that delivers benefits for all our internal and external stakeholders.

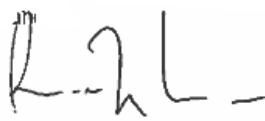
Climate change; the loss of global biodiversity; the impacts from single-use plastics; the health effects of transport emissions; and the illegal deposition of waste destined for recycling in developing countries; are all intrinsic concerns for responsible businesses operating today. To address these concerns, we have committed ourselves to achieving the following goals.

Our Environmental Commitments

- Deliver net-zero carbon emissions from our Group Property operations by 2050.
- Continue to source 100% renewable electricity for our property portfolio.
- Invest in energy efficient technology to reduce our property carbon footprint.
- Integrate environmental and energy performance considerations when acquiring, designing, refurbishing, and using our buildings and assets.
- Use resources more effectively, by targeting a continued reduction in the use of office consumables to minimise the negative effects on global biodiversity.
- Integrate environmental and sustainability requirements into decisions on the procurement of goods and services.
- Minimise our transport emissions, by increasing the use of technology to reduce overall business travel; supporting the use of public transport; and investing in electric vehicles.
- Minimise water use, to prevent the over-exploitation of watercourses and the negative effects on biodiversity.
- Minimise our waste arisings and manage our remaining waste responsibly, with an ongoing target to deliver zero waste to landfill.

Meeting compliance obligations are our minimum standard. We will strive to exceed these obligations wherever possible, for the benefit of all our stakeholders. Continual improvement in environmental performance will be a key measure of our company's success.

Our mission is to empower all our staff, partner organisations and wider stakeholders to assist us in achieving these goals, to sustain our business into the future, whilst addressing the environmental challenges that lie ahead.

Signed: 
Rob Taylor, Head of Group Property

Date: 25th August 2022

3.0 PLANNING

3.1 Environmental Aspects

3.1.1. Introduction

The significant environmental aspects associated with DLG Property activities are identified and assessed using the following process.

- **Aspect** refers to the potential for impacting on the environment e.g., emission to air, consumption of raw material etc.
- **Impact** refers to the physical change to the environment as a result of the aspect e.g., air pollution, depletion of non-renewable resources etc.

3.1.2. Methodology

- The formal identification and assessment of environmental aspects will be undertaken by competent persons.
- Environmental aspects are assessed on a site-specific basis.
- The assessment process is recorded on the **DLG Assessment of Environmental Aspects & Impacts Form**.
- Each office where DLG Property directly manage the site, will be assessed, and recorded on separate forms.
- Other areas of the EMS, such as business mileage and waste from projects will be assessed and recorded on separate forms.
- Other specific tasks may be assessed and recorded separately, as required.
- Aspects arising from all in-scope activities will be considered under normal, abnormal, and emergency conditions.

The assessment process is undertaken using the following methodology:

3.1.3. Assessing Residual Significance

All potential environmental impacts are assessed for significance using the following formula:

$$\text{Likelihood} \times \text{Consequence} = \text{Residual Significance}$$

Note: The likelihood and consequence of an environmental impact occurring is assessed after consideration is given to existing control measures, to determine the residual significance level.

Likelihood & Consequence are defined by the following scoring system:

Likelihood	
1 - Rare	Environmental impact unlikely to occur under normal circumstances
2 - Unlikely	Infrequent impact
3 - Occasional	Intermittent impact
4 - Likely	Impact occurs on a frequent basis
5 - Highly Likely	Continuous environmental impact (or unknown risk)
Consequence	
A - Negligible	No significant impact / best environmental option
B - Minor	Transient low scale impact

C - Moderate	Localised impact. No long term effects. May be costs associated with clean-up and prevention. Minimal reputational damage, if at all
D - Substantial	Impact becoming more widespread. Potential for financial liabilities, reputational damage and enforcement action
E - Major	Large scale widespread impact. Long term effects. Financial liabilities. Lasting reputational damage

The residual significance is calculated as follows:

Likelihood	Rare	1	1A	1B	1C	1D	1E
	Unlikely	2	2A	2B	2C	2D	2E
	Occasional	3	3A	3B	3C	3D	3E
	Likely	4	4A	4B	4C	4D	4E
	Highly Likely	5	5A	5B	5C	5D	5E
			A	B	C	D	E
			Negligible	Minor	Moderate	Substantial	Major
			Consequence				

The residual significance rating and the appropriate level of action required to address the potential impact are as follows:

	Significance Rating
Low	No action required. Monitor for change
Moderate	Monitor. Review existing measures / introduce new control measures, to reduce environmental impact where possible
High	High environmental risk. Mandatory control measures to reduce impact. Training and monitoring required
Severe	Severe risk. Stringent controls needed to reduce risk. Training and continuous monitoring mandatory. If non-business critical, consider immediate suspension of process or activity

All aspects that are identified as having a residual significance rating of severe, high or moderate are transferred to the Consolidated EMP to be targeted for improvement and/or additional control measures.

3.1.4. Maintenance

- Environmental aspects will be reviewed on an annual basis at a minimum, to ensure they remain valid and adequately reflect ongoing activities.
- Reviews will not be confined to the planned annual review and will be undertaken as necessary in response to any:
 - Significant developments e.g., change to property portfolio.
 - Variation which could lead to a significant change in the potential impact upon the environment e.g., extended hours and functions; new market requirements; procurement practices etc.
 - Changes in compliance requirements.
 - Significant environmental incidents / accidents.
 - Significant non-conformances arising from audits and inspections.

- Successfully implemented improvement programmes that have lowered the residual significance of any environmental aspect.
- Emerging risks and opportunities.
- Any changes made as a result of the review process will be recorded along with the date of assessment.
- Any substantial increases in the residual significance levels of aspects as a result of the reviews, shall be communicated to the Property Delivery and Compliance Manager with immediate effect.
- The implications of any changes will be discussed at the periodic Team meetings. Any additional control measures or training needed to address the new requirements will be identified at this stage.

3.1.5. Communication

- The completed aspects assessments for each site will be stored on the Ascot Portal and will be accessible to the DLG Property Team.
- TFM Regional Operations Managers are responsible for ensuring that the relevant personnel are made aware of any new or amended operational requirements resulting from substantial increases in the residual significance of any environmental aspects. This training/communication will be recorded.
- TFM Regional Operations Managers are to ensure that all contractors operating within their managed sites are aware of any applicable constraints on their undertakings, as a result of significant issues identified in the aspects assessments

3.2 Compliance Obligations

3.2.1. Introduction

Compliance obligations applicable to DLG Property activities, are identified and evaluated using the following process.

- Compliance obligations can arise from environmental legislation and guidelines; local agreements; landlord requirements; collaboration with delivery partners; and the DLG Environmental Policy and company values.

3.2.2. Methodology

- Compliance requirements will be interpreted, with specific obligations identified within the **DLG ISO14001 Internal Audit Checklist England** and **DLG ISO14001 Internal Audit Checklist Scotland**. Annual environmental site audits will provide a formal review of compliance.
- All applicable compliance obligations will be identified and listed within the completed site-specific **DLG Assessment of Environmental Aspects & Impacts Form** and will be used to inform the assessment process.

3.2.3. Maintenance

- Compliance obligations will be subject to an annual review, to ensure that they remain accurate and fully reflect changing circumstance.
- Compliance with all relevant environmental obligations will be ensured through regular monitoring and measurement; via internal audits; and ongoing frequent informal spot checks. Any identified significant non-compliance will be logged as a non-conformance and acted upon in accordance with section **10.0 Non-Conformity & Corrective Action**.

3.2.4. Communication

- The completed **DLG Assessment of Environmental Aspects & Impacts Form** and **DLG ISO14001 Internal Audit Checklists** will be stored on the Ascot Portal and will be accessible to the DLG Property Team.
- Any significant changes to compliance obligations identified through the annual review process will be discussed at the next planned EMS Management Review meeting, or sooner if required at the regular Team meetings. The new or amended obligations will be communicated to site personnel as required, with clear instructions as to compliance requirements. This communication will be recorded.
- Training on any new requirements will be provided as necessary and will be logged.

3.3 Consolidated EMP

3.3.1 Introduction

The actions and responsibilities for establishing, prioritising and delivering against the Consolidated EMP are detailed in the following process. The Consolidated EMP details the potentially significant environmental aspects and assigns actions, timescales, and responsibilities to each of these aspects, with a view to mitigating or eliminating the potential for environmental harm.

3.3.2 Methodology

- All aspects with a residual significance calculated as moderate, high or severe are transferred to the Consolidated EMP to be targeted for improvement and/or additional control measures. This task is undertaken annually at a minimum, following the review of environmental aspects and compliance obligations.
- The Consolidated EMP comprises the following information:

DLG Property - Consolidated Environmental Management Plan (EMP)						Key:			
						Action Complete			
						On Target			
						Behind Schedule			
						Critically Behind Schedule			
						Not Started/no longer required			
Significance	Activity & Environmental Impact	Opportunity	Agreed Action	Applicable Site	Responsible	Company	Complete by:	Status	Progress update:

- The Consolidated EMP is a fluid document, so any actions identified outside of the review of aspects and compliance process, can also be added and targeted for improvement.
- Actions identified in the Consolidated EMP that are site-based tasks will be processed as a 'Remedial' through the Service Desk. Non-site-based tasks e.g. procedural changes will be actioned outside of this process, with the Consolidated EMP tracking progress.
- The Consolidated EMP is the mechanism by which continual improvement in environmental performance is achieved.

3.3.3 Maintenance

- All actions within the Consolidated EMP will be reviewed for progress monthly by the DLG Compliance Specialist. Where progress is behind schedule, the DLG Compliance Specialist will escalate to the DLG Property Delivery and Compliance Manager to discuss any issues that may be preventing the achievement of the target as part of the DLG Leadership Meetings.

- A formal review of progress against the actions identified within the Consolidated EMP will be undertaken at the EMS Management Review meetings. This is to ensure continual improvement in environmental performance. These reviews will be recorded and any required changes to the Consolidated EMP will be implemented within an agreed timescale.
- The review of the Consolidated EMP undertaken at the EMS Management Review meeting shall consider any changing circumstances, including:
 - Changes in Significant Aspects.
 - Changes in compliance requirements.
 - New technological options.
 - Cost/ benefit considerations.
 - Continued desire to effect change.
 - Views of interested stakeholders (e.g. DLG personnel, shareholders, partner organisations, landlords, local communities etc).
- Training on any new requirements identified within the updated Consolidated EMP, will be provided as necessary and will be logged.

3.3.4 Communication

The Consolidated EMP will be stored electronically on the Ascot Portal.

4.0 COMPETENCE & AWARENESS

4.1. Introduction

This process defines the actions and responsibilities to ensure that:

- All DLG Property personnel and contractors are made aware of relevant requirements of the EMS.
- All personnel whose work may create a significant impact on the environment receive information and effective training so that they are competent to undertake the identified task. The assessment of competence will be based on appropriate knowledge, education, training and experience.

4.2. Methodology

- All personnel within the wider DLG Property Team will be made aware of the:
 - DLG Property Environmental Policy Statement.
 - Potentially significant environmental impacts associated with their work activities and the environmental consequences of not following specified procedures.
 - Importance of conforming to the EMS.
- The relevant TFM suppliers are responsible for ensuring that all sub-contractors are competent, are aware of the DLG Property Environmental Policy Statement, and the relevant site environmental controls and constraints placed upon their works.
- A record will be kept of all communications delivered in relation to the above criteria.
- Raising awareness and building competency will be achieved through a mixture of informal and formal mechanisms. Formal training will be recorded in the **DLG ISO 14001 Training Matrix**.

4.3. Maintenance

- For new personnel, training and awareness will initially be delivered through an induction process, which will be logged.
- The evolving nature of environmental compliance and best practice will introduce new competence and training requirements over time. The DLG Property Delivery and Compliance Manager and DLG Property Managers and Regional Operations Manager will need to monitor and respond to such developments, to ensure all personnel and contractors have the competence to deliver their tasks in line with the requirements for continual environmental improvement.

4.4. Communication

- The **DLG ISO 14001 Training Matrix** will be updated by the DLG Compliance Specialist.
- The TFM Suppliers are responsible for liaising with sub-contractors to ensure that they meet the desired level of competence required to undertake specific tasks.

5.0 EXTERNAL COMMUNICATION

5.1. Introduction

This process defines the actions and responsibilities associated with documenting and responding to communication from external sources.

5.2. Methodology

- All written communications (excluding complaints) concerning Property environmental performance, that are received from external sources, will be forwarded to the DLG Property Delivery and Compliance Manager for review and response, as appropriate. A copy of all return correspondence will be kept with the original enquiry.
- All written complaints received from external sources relating to the environmental performance of DLG Property, are to be notified to and investigated by the DLG Property Delivery and Compliance Manager
- If the complaint is warranted, actions to remedy the complaint are to be processed as detailed in section **10.0 Non-conformity & Corrective Action**.
- Where a response is required, this is to be achieved within a maximum 30 days of receipt, or earlier if required. A copy of all return correspondence will be kept with the original enquiry.
- These records are to be kept for a period of 3 years.
- All complaints are to be discussed at the periodic Team Meetings, and at the EMS Management Review meeting if deemed significant.
- Persistent complaints, particularly with regards to recurring issues, are a significant concern. These are to be dealt with as described in section **10.0 Non-conformity & Corrective Action**.

5.3. Maintenance

- Any changes to the significance of environmental aspects, the Consolidated EMP and/or Operational Procedures as a result of external communications, including significant or persistent complaints, are to be made as necessary.

5.4. Communication

- The DLG Property Delivery and Compliance Manager will inform all relevant staff of the details of any significant environmental complaints and the actions required to remedy the issue, to prevent complaints from arising in the future.

- Regional Property Managers will inform all relevant staff of any changes to Operational Procedures and /or environmental Objectives resulting from the complaint.

6.0 DOCUMENTED INFORMATION

6.1. Introduction

This process defines the actions for creating, modifying, and controlling all documents and records pertaining to the EMS.

6.2. Methodology

6.2.1. Directly Controlled Documents

There are a limited number of EMS documents directly controlled by DLG Property. These are:

- Environmental Policy Statement
 - DLG Property EMS Manual
 - DLG Assessment of Environmental Aspects & Impacts Form
 - DLG ISO14001 Internal Audit Checklist England and DLG ISO14001 Internal Audit Checklist Scotland
 - DLG ISO14001 Internal Audit Plan
 - DLG ISO14001 Training Matrix
- Controlled documents are identified with a document name and version number /date.
 - The latest versions of all controlled documents are stored in the Ascot Portal under 'Accreditations – DLG EMS ISO14001 – Controlled Documents' as Read-Only files.
 - Access rights to the Ascot Portal are agreed with the DLG Property Delivery and Compliance Manager or DLG EMS Compliance Specialist and are controlled by Ascot Services.
 - Printing documents in hard copy is discouraged for environmental reasons and should be limited to essential use only. Any printed documents will be deemed uncontrolled, and users should confirm the correct version numbers with the documents in the Ascot Portal, prior to use.

6.2.2. Other Controlled Documents

- All other controlled documents are owned and administered by the TFM suppliers, Mainstay and Ascot, and are stored on their respective systems. These documents are controlled in line with their own internal management systems. These environmental procedures and their application are reviewed for adequacy through the internal audit process. Any significant changes to these procedures must be agreed with the DLG Property Delivery and Compliance Manager.

6.3. Maintenance

- The structure of directly controlled documents can only be edited by the DLG Property Delivery and Compliance Manager and other authorised persons.
- Any amendments to controlled documents must be listed in the documents' Process Amendments Log, detailing the date, amendments made and the initials of the person making the amendment.
- All superseded document versions are to be deleted.

6.4. Communication

- The Property Delivery and Compliance Manager will inform all relevant staff of the details of any significant amendments made to controlled documents.
- Regional Property Managers and relevant TFM Suppliers will inform all relevant staff of any changes to Operational Control procedures and ensure these changes are understood and effectively implemented.

6.5. Records

- The following information generated from the EMS will be stored as Records within the DLG EMS 14001 section of the Ascot Portal.

Record	Location
Internal Audits	Ascot Portal 'Accreditations – DLG EMS ISO14001 – Records – Audits - Internal Audits and Action Plans'
External Audits	Ascot Portal 'Accreditations – DLG EMS ISO14001 – Records – Audits – External Audits'
Environmental Aspects and Environmental Management Plans	Ascot Portal 'Accreditations – DLG EMS ISO14001 – Records – Aspects and Environmental Management Plans'
EMS Management Review Minutes	Ascot Portal 'Accreditations – DLG EMS ISO14001 – Records – Management Review'
External Communications (including complaints)	Ascot Portal 'Accreditations – DLG EMS ISO14001 – Records – External Communications and Complaints'
Incident Report (significant environmental incidents)	Ascot Portal 'Accreditations – DLG EMS ISO14001 – Records – Incident Reports'
Waste records (Waste Performance Monthly Totals Spreadsheet; Waste licences and destinations etc).	Mainstay SharePoint – EMS ISO14001 – Mainstay 14001 Documents – Records – Waste Management
Training Matrix	Ascot Portal 'Accreditations – DLG EMS ISO14001 – Records – Training'

- All other records relating to site environmental management which arise from the actions of the TFM Suppliers, will be held on their respective systems, for example, F-Gas records will be located in Ascot Portal 'Sites – Choose site – Servicing & Certification – Hard Services – 2018/19 – M_04 F-Gas Review' and 'AC Service'.

6.6. Maintenance

- All Records pertaining to the maintenance of the EMS shall be retained for a period of 3 years, other than:
 - Competency Records - A minimum of 3 years after employment.
 - F-Gas Records – 5 years.
 - Prosecutions – Minimum 7 years.
- Records will be deleted after this time.

6.7. Communication

- The DLG Property Delivery and Compliance Manager or DLG Compliance Specialist must be informed prior to any documents being moved to a new location.

7.0. OPERATIONAL CONTROL

7.1. Introduction

This process defines the actions and responsibilities for establishing a system of operational control to ensure the effective implementation of the EMS, in accordance with the overarching DLG Environmental Policy Statement, compliance requirements, and the DLG Property environmental objectives.

7.2. Methodology

- The Operational Control Procedures (OPS) developed to cover key activities at a site level that have the potential to cause a significant environmental impact and/or result in legislative non-compliance, are mainly owned and managed by the TFM Suppliers.
- The TFM Suppliers operate and manage these OPS under their respective ISO14001 certified Environmental Management Systems (EMS). The OPS include but are not limited to:

7.2.1. Mainstay processes

- EMS 0007 Waste Management Process
- EMS 0008 Spill Response – Loss of Oil from Vehicles
- EMS 0008 Spill Response is augmented by the DLG Property Process ISO/2021/DLGPP 01- Vehicle Leaks

7.2.2. Ascot processes

- QM-KP25 Rev 5 Planned Maintenance Process
- QM-KP28 Rev 1 Chemical Spill Process
- Subcontractor Approval Process. Checklist QM155
- M_04 F-Gas Register
- F-Gas Log Sheet (DLGPT-SST-011 Rev 1)
- Generator Visual Inspection Check Sheet

7.3. Maintenance

- The Operational Control Procedures (processes) are reviewed for adequacy by DLG Property through the ongoing ISO14001 internal audit process.
- They may also be reviewed in light of any:
 - Significant non-conformance highlighting deficiencies in a process
 - Evolving requirements
 - Views of stakeholders e.g. staff; waste contractors etc
 - Technological advancements e.g. F-Gas use; waste management etc
 - Other significant factors

7.4. Communication

- Any planned changes to environmentally related OPS will be discussed and agreed with the DLG Property Delivery and Compliance Manager prior to implementation.
- The Regional Property Managers and relevant TFM suppliers will ensure that all relevant personnel are briefed on any new requirements. A record of these briefings will be kept.

8.0. EMERGENCY PREPAREDNESS & RESPONSE

8.1. Introduction

This process establishes a system for the prevention, mitigation and management of environmental impacts arising from abnormal, accident and emergency situations.

8.2. Methodology

- The environmental risks associated with abnormal, accident and emergency situations have been assessed using the **DLG Assessment of Environmental Aspects & Impacts Form**.
- The evaluation process has identified that there are residual environmental risks associated with potential polluting events from a loss of fuel/oil from generators and bulk fuel storage, and from the loss of oil from vehicles.
- The response to loss of oil / fuel from generators and bulk fuel storage is managed in accordance with the Ascot process **QM-KP28 Rev 1 Chemical Spill Process**. Relevant Ascot staff will be trained in this process. A record will be kept of this training.
- The response to oil spills from vehicles is managed in accordance with the Mainstay Operational Control Procedure **EMS 0008 Spill Response – Loss of Oil from Vehicles and the DLG Property Process ISO/2021/DLGPP 01- Vehicle Leaks**. Relevant Mainstay and Ascot staff will be trained on this process. A record will be kept of this training.

8.3. Maintenance

- The responsibility for maintaining spill kits is as follows:
 - Car parks – Mainstay
 - Checked during Monthly Workplace H&S Audit
 - Generators & bulk fuel areas – Ascot Services
 - Monthly checks using Generator Visual Inspection Check Sheet
- Spill response processes will be rehearsed annually to test their continuing efficacy. A record of these tests will be kept. Where areas of deficiency are identified, these will be rectified, and a new version of the process issued.
- Any fuel/ oil leaks from generators or bulk fuel areas that escape containment and enter the wider environment, will be deemed an environmental incident and will be logged as a non-conformance in accordance with **Section 10.0 Non-conformity & Corrective Action**.
- Any fuel/ oil leaks from vehicles on the premises which are not effectively contained and enter the drainage system, will be deemed an environmental incident and will be logged as a non-conformance in accordance with **Section 10.0 Non-conformity & Corrective Action**.
- Where environmental impacts have occurred as a result of leaks, the spill response process will be reviewed for adequacy and rewritten as necessary. Appropriate persons will be trained on the new requirements.
- New staff will be trained on spill control as appropriate, as part of their induction process.

8.4. Communication

- The DLG Property Delivery and Compliance Manager or DLG Compliance Specialist will inform all relevant staff of the details of any significant incidents and any subsequent changes made to the spill response process.
- The Regional Property Managers and relevant TFM Suppliers will ensure personnel are briefed on any new requirements. A record of these briefings will be kept.

9.0. PERFORMANCE EVALUATION

9.1. Monitoring, Measurement & Analysis

9.1.1. Introduction

This process defines the monitoring and measurement that is required across DLG Property, on activities that can have a significant impact on the environment.

Activities will also be monitored against compliance requirements (defined in section **3.2 Compliance Obligations**); against the environmental objectives (defined in section **3.3 Environmental Management Plan**); and the Audit Action Plans (defined in section **9.2 Internal Audit & Evaluation**).

- Monitoring refers to a qualitative assessment of performance, for example, a visual inspection of the waste storage area.
- Measurement refers to a quantitative assessment of performance, for example, tonnes of DMR waste generated.

9.1.2. Methodology

- Site energy and water use will be monitored and reported by BiU.
- Site waste arisings will be monitored, and recycling rates measured, utilising the **Waste Performance Monthly Totals Spreadsheet**, administered by Mainstay.
- Any waste reduction and recycling targets will cover day-to-day waste arisings, including general waste, dry mixed recycling (DMR), cups and confidential paper waste streams. Other waste streams, such as washroom waste, sharps, domestic batteries, fluorescent tubes and small amounts of hazardous wastes arising from Ascot day-to-day activities, are of minimal weight and will not be captured in the figures.
- Waste from projects will be monitored by Ascot services and reported to Mainstay, for inclusion as a separate tab in the **Waste Performance Monthly Totals Spreadsheet**.
- The consumption of cleaning consumables will be monitored, utilising the **Direct Line Product Sales by Site Matrix** administered by Mainstay.
- All individual members of the DLG Property Leadership and DLG National Support roles are responsible for capturing their own business mileage i.e., mileage incurred by these teams in the act of undertaking their duties (excluding commuting to work), utilising the **DLG Property Business Mileage Tracker**. This tracker is checked quarterly by the DLG Compliance Specialist and any anomalies escalated to the DLG Property Delivery and Compliance Manager.
- Other activities that can have a significant impact upon the environment and require monitoring and/or measuring are detailed within the Consolidated EMP.
- Monitoring compliance requirements will be undertaken in accordance with the process defined in section **9.2 Internal Auditing & Evaluation**.

9.1.3. Maintenance

- The DLG Compliance Specialist will review progress against environmental objectives and targets monthly. Progress will be documented on the Consolidated EMP.
- Any objectives that are behind target will be reported to the DLG Property Delivery and Compliance Manager and DLG Compliance Specialist, who will determine what further actions are required to achieve the objective.
- Progress against targets and the effectiveness of the monitoring and measuring programme will be discussed at the EMS Management Review meetings.

9.1.4. Communication

- The DLG Compliance Specialist will inform all relevant staff of the details of any significant changes to the monitoring and measurement programme.

9.2. Internal Auditing & Evaluation

9.2.1. Introduction

This process establishes and maintains a system of regular internal audits of the EMS, to determine the continuing applicability and effectiveness of the system and whether it has been fully implemented and maintained.

9.2.2. Methodology

- All offices within the defined scope of the EMS will be audited annually, other than Landlord operated satellite offices, as DLG Property have little influence over the significant environmental issues that arise on site.
- The frequency of audits is detailed on the **DLG ISO14001 Internal Audit Plan**.
- Each audit will include an evaluation of environmental compliance, including the needs of interested parties and the requirements of environmental legislation.
- Audits will be undertaken using the **DLG ISO14001 Internal Audit Checklists**.
- Non-conformances and Opportunities for Improvement identified in the audits are listed in the Consolidated Audit Action Plan.
- Additional compliance checks will be undertaken by the Mainstay representative when undertaking the Monthly Management Audit and Monthly Workplace H&S Audit, and via the Ascot Services PPM checks.

9.2.3. Maintenance

- Non-conformances and Opportunities for Improvement identified in the audits are processed as detailed in section **10.0 Non-conformity & Corrective Action**.
- The DLG Compliance Specialist undertakes checks of progress against the actions listed in the Audit Action Plan during the monthly Consolidated EMP meetings.
- The **DLG ISO14001 Internal Audit Plan** details the audit programme for the next calendar year and is updated as required.
- The **DLG ISO14001 Internal Audit Checklists** are reviewed annually, and compliance requirements are updated as required. An updated document version number is issued in the event of any changes.

9.2.4. Communication

The DLG EMS Administrator will inform all relevant staff of the details of any significant changes to the audit process and/or schedule.

9.3. Management Review

9.3.1. Introduction

This process establishes a system to ensure that the Property Leadership Team review the EMS on a periodic basis.

9.3.2. Responsibilities

- The DLG Property Leadership Team is responsible for reviewing the EMS at its planned meetings.

9.3.3. Methodology

- The EMS Management Review meetings will be held annually at a minimum.
- The Management Review will cover the whole of the EMS and will include a review of:
 - Progress against actions identified in the previous meeting.
 - Progress against environmental Objectives detailed in the Consolidated EMP.
 - Incidence of significant non-conformance.
 - Environmental incidents.
 - Complaints.
 - Adequacy of resources and training needs.
 - Changing circumstances (e.g. Changing business needs; new Property requirements; new procurement practices; emerging compliance and CSR requirements; views of interested parties; technological advances; emerging risks and opportunities etc) that could impact upon the delivery of the and achievement of the DLG Property strategy and environmental objectives.
 - Opportunities to improve the EMS and environmental performance.
- A written record of the outputs of the meeting, **EMS Management Review Minutes**, will be stored on the Ascot Portal.

9.3.4. Maintenance

- Any changes needed to the EMS due to decisions made at this meeting will be co-ordinated by the DLG Property Delivery and Compliance Manager.
- The Property Leadership Team is to ensure that enough resources (staff, time & financial) are made available to implement and achieve tangible environmental improvements for priority environmental issues. This process is an essential mechanism to ensure continual improvement of environmental performance.
- A Management Review meeting may be convened at any time if significant changes to the nature of operations are planned; in the event of any significant non-conformance; or concern regarding the effectiveness of the EMS.

9.3.5. Communication

- The DLG Property Delivery and Compliance Manager will inform all relevant staff of the details of any significant changes made to the EMS.
- Regional Operations Managers and relevant TFM Suppliers will inform all staff of any changes made to Operational Procedures and ensure these changes are understood and effectively implemented. A record of these briefings will be kept.

10.0. Non-Conformity & Corrective Action

10.1. Introduction

This process defines a system for the early recognition of non-conformances that could lead to detrimental impacts on the environment, and the subsequent implementation of corrective actions to prevent similar occurrences.

Non-conformance (NC) = failure to meet the required standard.

Opportunity for Improvement (Opp) = Opportunity to improve the EMS, enhance environmental performance, or achieve enhanced business efficiency

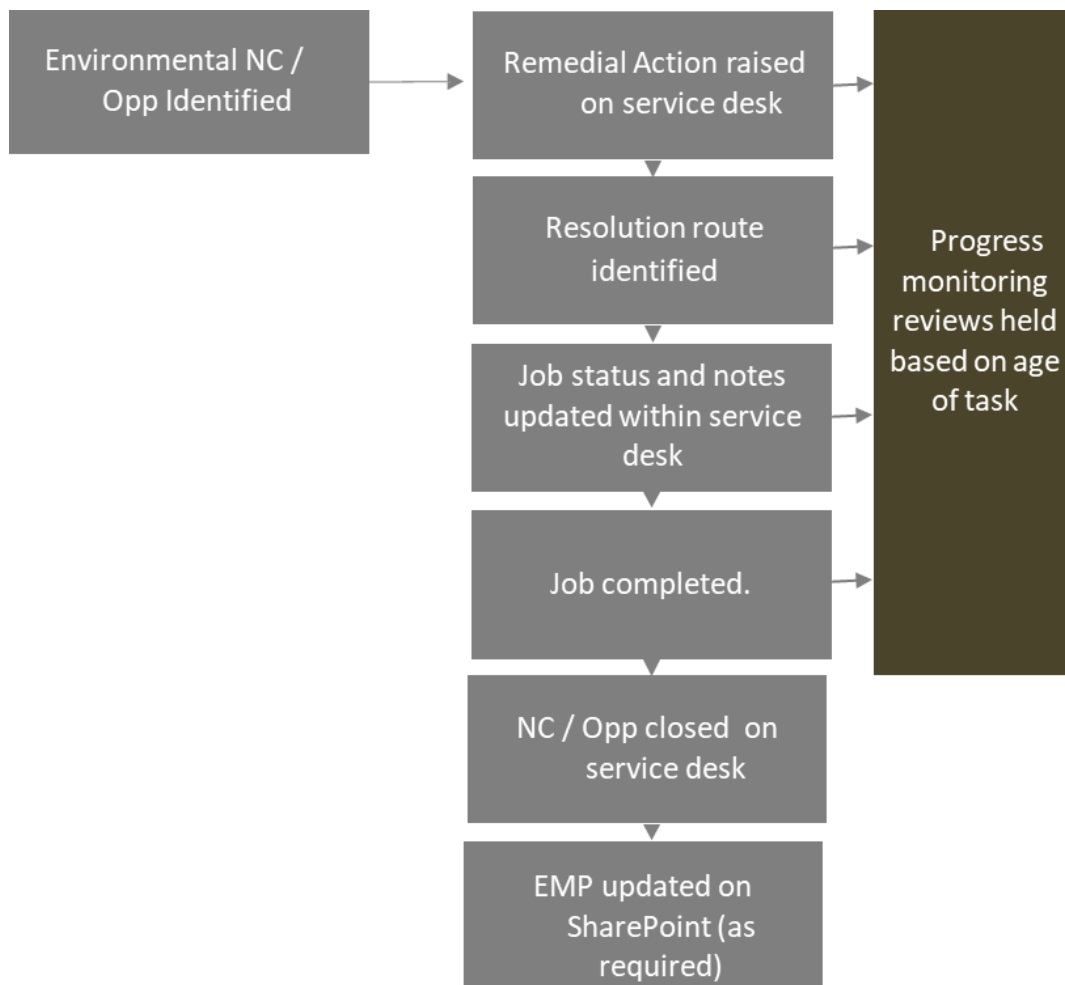
10.2. Categories of Environmental Accident/ Incident

1. Loss of fuel/oil/coolant from generators/bulk fuel tanks into the wider environment.
2. Acts of vandalism, theft, fire, or a vehicle collision (that have impacted upon the integrity of fuel storage areas).
3. Spillages of fuel during fuel delivery.
4. Loss of fuel/oil from vehicles.
5. Leaks of F-Gas from AC and/or Chiller units.
6. Significant chemical (non-petroleum) spillages (includes any spills that have entered the surface water drainage system or >1 litre to ground).
7. Fly tipping by contractors (waste originating from DLG estate).
8. Water leak (sufficient to affect supply to building services and/or water pressure).
9. Sewage leak (sufficient to exit the office space and escape into the wider environment).
10. Complaints (external communications in relation to environmental issues).
11. Statutory notices (communications from the Regulator e.g., Environment Agency, Local Authorities, SEPA in relation to environmental issues).

10.3. Methodology

- Failure to meet the required standards as stipulated within the EMS will be recorded as non-conformances (NC). Lesser issues identified, where there is an opportunity to improve the EMS, enhance environmental performance, or achieve enhanced business efficiency are identified as opportunities for improvement (Opp).
- NC's and Opp's can be raised at any time and are typically identified through the process of internal and external audits; as a result of environmental incidents; complaints; client observations; and informal staff suggestions.
- NC's and Opp's that relate to site-based tasks will be processed as a 'Remedial' through the Service Desk. Non-site-based tasks e.g. procedural changes will be actioned outside of this process, being tracked through the Consolidated Audit Action Plan or the Consolidated EMP.
- Remedial actions are progressed through the Service Desk as follows:

10.4. Environmental Non-Conformance (NC) Process – Interaction with Service Desk



- Environmental Incidents/ complaints which can have an impact on the safe and secure running of a DLG building, including any incident where there is a significant health and safety breach or there is a reputational risk to Property, will also be documented on a **DLGPT Operational Incident Report** and sent to the Regional Property Manager to agree actions to resolve the issue.

10.5. Maintenance

- Any changes needed to EMS documents as a result of significant or persistent non-conformance will be co-ordinated by the DLG Property Delivery and Compliance Manager.

10.6. Communication

- The Property Delivery and Compliance Manager will inform all relevant staff of the details of any significant changes made to the EMS documents.
- Regional Property Managers and relevant TFM Suppliers will inform all staff of any changes made to the EMS that affects their activities and will ensure these changes are understood and effectively implemented. A record of these briefings will be kept.