

ewmpas

For economic and
social change

Environmental Policy

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Author: Interim Green Dragon Lead

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Cwmpas is a registered society under the Co-operative and Community Benefit Societies Act 2014, number 24287R.

We welcome correspondence in English or Welsh and aim to provide an equal standard of service in both languages.

cwmpas

Policy statement

- 1.1 We believe that our economy and society should work differently, putting people and planet first.
- 1.2 We recognise and commit to both the legal and moral obligations to protect and improve the environment for future generations.
- 1.3 This document is intended to clearly communicate our commitment, and to document our Environmental Management System (EMS) which will ensure that our commitment is achieved. The EMS includes:
 - A senior level commitment to the protection of the environment
 - Provision of the necessary resources to ensure success
 - Identification of and compliance with regulatory and voluntary obligations
 - Identification and evaluation of the environmental impacts resulting from operational activities
 - Prevention of pollution and other environmental impacts wherever possible
 - Identification and adoption of working practices which prevent harm and degradation of the natural environment wherever possible
 - Setting and reviewing environmental objectives and targets
 - Communication of environmental issues
 - Confirmation of the specific responsibilities of people in the organisation
 - Monitoring and evaluation of the EMS to ensure continual improvement.

Scope

- 2.1 This policy applies to all Cwmpas employees and operations.

Procedure

Operational Activities

- 3.1 We are a development agency working for positive change in Wales and across the UK.
- 3.2 Our strategy outlines 3 strategic missions:
 - 1 Creating a fairer, greener economy: We are working to increase the proportion of the economy made up by social enterprises, co-operatives and employee-owned businesses.
 - 2 Building a more equal society: We are working to advance social justice by increasing access, equity, diversity and participation.
 - 3 Making positive change happen: We are working in co-operation with people and organisations to take action for social good.

- 3.3 In addition, we have set ourselves a cross cutting goal against all areas of our work to take action on climate change. As part of this, we have made a clear commitment to be a carbon neutral organisation by 2030.
- 3.4 The nature of our business means that operational activities at all our premises are administrative in nature. Nevertheless, we recognise that all human activity has an environmental impact.
- 3.5 Between 2020 and 2022 we exited all long term leased offices across Wales in favour of working from home and using flexible shared working spaces across Wales where collaborative "in person" working is needed. This remains our default way of operating.

Responsibilities

- 3.6 General responsibilities associated with environmental matters for people at all levels of Cwmpas are outlined in Appendix 1. It should be noted that the listed responsibilities are intended as a general guide. They are not exhaustive.
- 3.7 We expect people to work and behave in an environmentally aware manner. Where a member of staff repeatedly fails to meet their environmental obligations, this will be considered as a breach of this policy and disciplinary action may be taken in line with our Disciplinary policy.

Compliance Obligations

- 3.8 We are committed to complying with all relevant legislation and other regulatory requirements or voluntary commitments. These are identified in the Register of Compliance.
- 3.9 The Register of Compliance is maintained by the Director of Finance and Resources and will be reviewed at least annually in conjunction with the Chief Executive. Reviews will include periodic checks against sources of environmental legislation and subscription to services which provide automatic updates.
- 3.10 Owing to the low-risk nature of our business activities, it is not envisaged that breaches of the compliance register will occur. However, where compliance problems are identified, these will be recorded within myHR. myHR records are reviewed regularly and where issues are recorded this will trigger a process of investigation and corrective action. Non-compliance issues will be reported to Board. The results of corrective actions will be recorded and reviewed to ascertain effectiveness.
- 3.11 We will also contact the Green Dragon Environmental Standard Administrator at Groundwork as soon as possible if non-compliance with a legal requirement occurs and results in a summons for prosecution, an enforcement notice or an abatement notice.

Environmental Aspects Register

- 3.12 We identify the key environmental aspects resulting from our human or operational activity, assess their severity and identify control measures which will minimise the risk wherever possible.
- 3.13 These are documented in the Environmental Aspects Register, which is maintained by the Director of Finance and Resources and will be reviewed at least annually in conjunction with the Chief Executive.
- 3.14 We apply the waste hierarchy to handle the non-hazardous waste which we generate. Details of the waste hierarchy can be found in Appendix 2.

Pollution Prevention Plan

- 3.15 We maintain a Pollution Prevention Plan, which takes account of the Environmental Aspects Register.
- 3.16 The Pollution Prevention Plan aims to minimise the environmental risks and provide an effective response to any potential incident.
- 3.17 The Pollution Prevention Plan describes pollution risks and proposed measures to prevent pollution incidents and describes proposed measures to mitigate environmental impacts resulting from pollution incidents.
- 3.18 We are proud that we have never experienced a pollution incident, but in the event that an incident did occur this would be recorded within the myHR facility. myHR records are reviewed regularly and where issues are recorded this will trigger a process of investigation and corrective action. Pollution incidents will be reported to Board. The results of corrective actions will be recorded and reviewed to ascertain effectiveness.
- 3.19 The Pollution Prevention Plan is maintained by the Director of Finance and Resources and will be reviewed at least annually in conjunction with the Chief Executive.
- 3.20 In addition, we have in place a full "Business Continuity Plan" which provides guidance in the event of a major disruption or disaster.

Objectives and Targets

- 3.21 Taking into account the Environmental Impact Register, the Environmental Aspects Register, the Pollution Prevention Plan and other organisational commitments, we have identified where our activities have an impact on the environment and set ourselves an objective and a target.
- Our objective is to achieve our strategic mission one of creating a fairer, greener economy.

- Our strategy outlines a target to be a carbon neutral organisation by 2030.
- In addition, Cwmpas has committed to the SME Climate Hub pledge to halve emissions by 200, achieve net zero by 2050 and report on our progress annually.

3.22 In order to achieve these, we have created an action plan. The action plan outlines key thematic areas around:

- Making a clear commitment to tackling climate change and holding ourselves accountable for progress
- Calculating our environmental impact in terms of a carbon footprint
- Reducing our carbon footprint
- Promoting and encouraging environmental awareness amongst staff, clients and other stakeholders
- Communicating our commitment internally and externally

3.23 In addition, the action plan identifies:

- specific actions
- responsible person(s)
- resources required
- timescales
- monitoring criteria / evaluation indicators for assessing progress

3.24 The action plan will be reviewed and amended as necessary to reflect changes within the EMS, and/or achievements made, in line with continuous improvement.

Internal and External Communication

3.25 We will communicate information as outlined below:

What	When	To Whom	How
Environmental Policy	Annually or as updated	Board Members	Risk & Audit/Board meeting
		Employees	myHR, Connect
		General public	Website
		Groundwork Wales	Green Dragon EMS
Compliance register	Annually or as updated	Employees	SharePoint
		Groundwork Wales	Annual audit
Environmental Aspects register	Annually or as updated	Employees	SharePoint
		Groundwork Wales	Annual audit
Pollution prevention plan	Annually or as updated	Employees	SharePoint
		Groundwork Wales	Annual audit
Objectives and Targets Action Plan	Annually or as updated	Employees	SharePoint
		Groundwork Wales	Annual audit
Monitoring data	Annually or as updated	Employees	SharePoint
		Groundwork Wales	Annual audit
Environmental Report	Annually or as updated	Employees	Connect
		General public	Website
		Groundwork Wales	Annual audit

- 3.26 We will communicate other information relating to environmental issues via Board and/or staff meetings, the intranet site, staff newsletters, blogs or social media accounts as appropriate.
- 3.27 Responsibility for responding to external communications will be agreed by the Senior Leadership Team and delegated to an appropriate person dependent on the context. Details of correspondence shall be provided to the person with responsibility for managing the EMS (currently the Director of Finance and Resources).
- 3.28 Suppliers and contractors will be made aware of any criteria around ethical procurement as part of the procurement process. Contracted providers will be directed to the Environmental Policy.
- 3.29 Staff are encouraged to promote good environmental practices and to share our commitment to improving our own environmental performance with other people and organisations.

Continual Improvement

- 3.30 We are committed to continually improving our environmental management and performance.
- 3.31 In particular, we will seek to improve:
- our understanding of our environmental impacts and the ways in which human and operational activities cause these
 - our capacity to address these environmental impacts
 - measurable environmental performance.

Monitoring and Evaluation

- 3.32 The effectiveness of the EMS will be monitored and evaluated based on:
- Relevant data associated with objectives and targets
 - Findings of key documents such as the Compliance Register, Environmental Aspects Register and the Pollution Prevention Plan
 - Outcomes of external audit by organisations such as Groundwork Wales
 - Any non-compliance or pollution incidents.
- 3.33 Where necessary, improvement actions will be taken.

Review

- 4.1 This policy will be reviewed on an annual basis by the Director of Finance and Resources and the Chief Executive, or earlier in the event of relevant legislative or compliance changes.
- 4.2 The next date for review is November 2025.



Signature of Bethan Webber, Chief Executive:

Date: 28th November 2024

Appendix 1: General Responsibilities

Board Members

- Ultimate responsibility for all aspects of environmental management.
- Ratify any new procedural documents.

Chief Executive

- Delegated responsibility for operational delivery of all aspects of environmental management.
- Contribute to the development of any new procedural documents.
- Approve new and revised documents.

Senior Leadership Team

- Ensure that environmental matters are given equal prominence with all other strategic or operational decisions.
- Ensure that, as far as reasonably practicable, effective arrangements are in place to protect the environment.
- Ensure the provision of appropriate resources so that environmental commitments can be met.
- Ensure that environmental risks are regularly reviewed, with a view to establishing organisation wide risks, and mitigating those risks as far as reasonably practicable, especially when entering into new areas of business. Where risks cannot be eliminated, review these regularly.
- Lead by personal example and set high standards for staff in environmental management.
- Review environmental information in order to monitor and review the effectiveness of the Environmental Management System, at least annually or following a significant change or non-conformance.
- Ensure overall compliance with our environmental policy and procedures.

Management Team

- Ensure that environmental matters are given equal prominence with all other strategic or operational decisions
- Ensure that, as far as reasonably practicable, effective arrangements are in place to protect the environment.
- Ensure that environmental risks within own area of responsibility are regularly reviewed, with a view to establishing and mitigating risk as far as reasonably practicable. Where risks cannot be eliminated, review these regularly and report them to the Senior Leadership Team.
- Lead by personal example and set high standards for staff in environmental management.

- Ensure staff within own area of responsibility are aware of and comply with the Cwmpas environmental policy and procedures and communicate any changes.

Environmental Management Representative (“Competent Person”)

- NB – The Director of Finance and Resources currently undertakes this role.
- Implement and maintain the Environmental Management System.
- Ensure that the Environmental Management System is integrated across all of the organisation’s activities.
- Keep the Environmental Policy, Compliance Register, Pollution Prevention Plan and Environmental Aspects Register up to date.
- Co-ordinate environmental objectives, target and improvements.
- Monitor environmental performance and competence.
- Communicate on environmental issues (internally and externally).
- Ensure that staff are aware of environmental responsibilities, commitments, roles, authorities and environmental performance.
- Report to Senior Leadership Team on the organisation’s environmental performance and the effectiveness of its Environmental Management System.
- Act on any reports of incident, or environmentally adverse behaviours, methods of work or equipment and initiate remedial actions to prevent recurrence.

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Individuals (applies to all employees, agency staff, contractors and visitors)

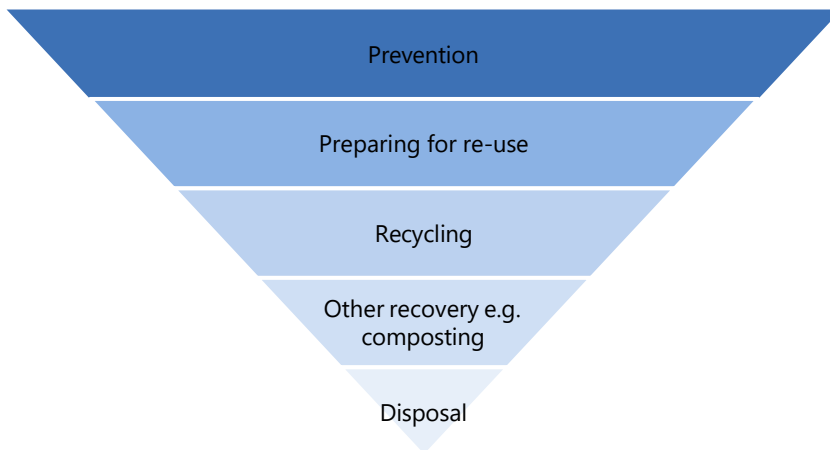
- Work in an environmentally considerate manner and promote this approach to others wherever possible.
- Adhere to the principles of the Waste Hierarchy, as detailed in Appendix 2.
- Adhere to our environmental policy and procedures.
- Inform manager immediately if involved in or observe any incident which has an adverse environmental impact.
- Report any environmental incident via the myHR accident reporting function.

Appendix 2: Waste Hierarchy

The waste hierarchy is a system of waste management which ranks options according to what is best for the environment.

It prioritises preventing waste in the first place. When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (landfill).

The waste hierarchy is set out at Article 4 of the revised Waste Framework (Directive 2008/98/EC)



Further information can be found at the link below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf