





Environmental and Sustainable Development Policy

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Company Definitions:

STEPS TO WORK

The company is a charitable company limited by guarantee with its registered office being Townend House, Floor 6, Park Street, Walsall, WS1 1NS.

STARTING POINT RECRUITMENT Ltd

The company is a company limited by shares owned by Steps to Work with its registered office being Townend House, Floor 6, Park Street, Walsall, WS1 1NS.

Throughout this document Steps to Work is named to encompass all actions undertaken by Steps to Work / Starting Point Recruitment Limited.

CIRCLE OF LIFE TRAINING Ltd

The company is a company limited by shares owned by Steps to Work with its registered office being Townend House, Floor 6, Park Street, Walsall, WS1 1NS.

Throughout this document Steps to Work is named to encompass all actions undertaken by Steps to Work / Starting Point Recruitment Limited / Circle of Life Training Limited.

Our Mission

To create opportunities and change futures by forging connections between local people and businesses.

Our Vision

To help people, many of whom face multiple barriers, find sustainable rewarding and meaningful jobs.

Our Values

- Our Passion Inspires
- Creating Positive Social Change
- Acting With Integrity
- We Transform Through Innovation

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1. Organisational Context

Business Objectives

In operating as a successful business, we are committed to carrying out all our business activities in a sustainable manner by pursuing continual improvement in all aspects of our business.

Environment

Steps to Work / Starting Point Recruitment/ Circle of Life Training recognises the impact that its activities through its policies, strategies, services, delivery programs and projects can have upon the local and wider environment. The organisation values the community and the environment and is committed to working to ensure that we comply with our obligations, operate in a sustainable way and protect the environment, passing on to future generations a thriving community within a clean, green, safe, and healthy environment.

Interested Parties

Based in and around Walsall and the West Midlands STW / SPR/ ColTrain cannot operate in isolation and interact with many other organisations who we may consider as 'interested parties' and who may influence our activity. In determining the interested parties we have categorised those that we consider would be particularly affected by our actions and activities;

Accountability

Board of Trustees (H) Charity Commission (M) Funding Organisations (H)

Influence

Environmental Pressure Groups (M)

Proximity

Local Community (M)
Local Authority (M)
Employers (H)
Landlord (H)
Emergency Services (L)

Dependancy

Employees (H)
Customers (H)
Delivery Partners (H)
Clients (H)
Suppliers (L)
Banks (H)

Representation

Trade Body (L)

Authoritative

Legislation (H)

Regulatory (H)

*(H) High interest/influence (M) Medium (L) Low

Internal & External Issues

Many factors affect the organisation and influence the direction we take and the decisions we make. In analysing the issues likely to effect the organisation we have considered both the internal and external factors that influence and affect our activities and subsequent environmental impacts (positive and negative) that may result. In identifying the issues below the organisation believes that these have the potential to have significant impact.

Internal

- Staff skills and knowledge
- Staff retention
- Succession Planning
- |7
- Buildings/Accommodation
- Cash Flow

External

- Brexit
- Political uncertainty & Economic outlook
- Skills & labour availability in marketplace
- Increased commercially focussed competition
- Revenue streams
- Changes to Benefit system
- Contractual arrangements

2. Scope

The Environmental and Sustainable Development Policy of Steps to Work and all references within this policy relate to all locations, activities, staff, products, and services of Steps to Work / Starting Point Recruitment Ltd

Steps to Work / Starting Point Recruitment Ltd are hereafter abbreviated as follows: -STW – Steps to Work SPR – Starting Point Recruitment Ltd ColTrain – Circle of Life Training Ltd

Whenever Steps to Work / Starting Point Recruitment or its abbreviation STW / SPR/ColTrain, is referred to in this policy.

This policy covers all individuals working at all levels and grades, including the Board of Trustees, Senior Managers, Officers, Employees, trainees / apprentices, part-time and fixed-term employees, casual / agency staff, volunteers and contractors / sub-contractors operating under agreement with STW / SPR/ ColTrain.

3. Leadership Commitment

The top management of STW/ SPR/ ColTrain recognize that the Environmental Policy and the Environmental Management System need to be reflective of the strategic direction and aims of the organization. Top management are committed to delivering the outcomes

of this policy and delivering continual improvement in performance whilst doing so. This commitment extends to:

- The Board of Trustees, Leadership and Wider Management Team of STW / SPR/ ColTrain and Partners developing activities and operations that reflect best environmental practice and to achieve continual improvement in these areas
- Ensuring that our ISO14001:2015 based system aligns with the strategic direction and objectives of the organisation.
- Providing the necessary resources either internal or external to support the Environmental Management System.
- The Board reviewing environmental performance against the objectives stated on a quarterly basis and environmental performance being published in the Annual Report.
- Ensuring that our Corporate and Social Responsibility objectives are detailed within our Corporate Social Responsibility strategy and our annual "Public Benefit Statements" published on the Charity Commission website as part of the ongoing Charity status of Steps to Work / Starting Point Recruitment

Environmental Policy

Steps to Work / Starting Point Recruitment recognise that the environment is a major factor in determining the quality of life in the areas in which it operates. It cannot be treated in isolation as it impacts upon, and in turn is affected by many other equally important social and economic issues. The organisation recognises that its activities have an impact on the environment in terms of the use of raw materials, emissions to air and water and waste generation and it will seek to minimise this as far as is reasonably practical.

Our Environmental aims will be to reduce our impact and encourage our 'partners' to reduce their impact through the adoption of initiatives such as;

- Increased recycling of waste products through initiatives such as better segregation, use of recycling bins, substitution with more 'friendly' products
- Consideration of the potential for a positive 'social impact' when disposing of items such as IT equipment.
- Sustainable sourcing and consideration of 'life-cycle' impacts when purchasing.
- Encouraging reduced consumption of fossil fuels through walking, cycling, car share initiatives or by use of public transport.
- Reducing the potential for pollution through the improved maintenance of facilities and services provided by utilities as well as adopting contingency plans.
- Reduced consumption of resources such as water and electricity encouraging all to 'switch off and maintain' and reinforcement of the message.

Steps to Work / Starting Point Recruitment committed, through all of our services, to contribute to the philosophy that we pass on to future generations a thriving community within a clean, green, safe, prosperous, and healthy environment. The Environmental Management System will be dynamic in nature and will consider the potential impacts both positive and negative of our activities now and in the future, understanding the aspects that influence our performance and their subsequent impact on the environment. We will ensure compliance against our obligations, and mitigate any adverse effects

resultant from our activities by focussing upon those areas we can influence and by adopting the principal of continuous improvement.

Resource Competence

The organisation appoints competent and experienced people to work within the organisation who may affect or impact upon its environmental performance. This will include employees who:

- Contribute to the achievement of environmental objectives
- Determine and evaluate environmental aspects and impacts
- Evaluate compliance
- Undertake internal audits
- Undertake management reviews
- Evaluate compliance

Training & Development

STW / SPR/ ColTrain will provide the opportunity for its staff to develop the appropriate knowledge, skills and behaviours to ensure that activities and tasks are carried out with the utmost respect for the environment and in line with the environmental management system.

Communication

The Environmental Policy will be communicated throughout the organisation and to interested parties ensuring that all are aware of its existence, its purpose, their role in achieving the outcomes and our performance. The nature of this communication will take the form of:

- Briefing during the induction process for all new starters
- Formal briefing sessions undertaken quarterly with all Managers in order for them to cascade down the information to all locations.
- Informal 'toolbox' talks across the organisation
- Review of any issues, performance, changes in the EMS during relevant employee forums
- Inclusion of a section on the environment within newsletters issued by the marketing department.
- Posting of relevant information on organisation noticeboards.
- Published environmental performance within the Annual Report.
- Inclusion within customer performance versus objective reports for the programmes we deliver.

Sustainable and Ethical Procurement

Sustainable procurement is considered for all purchases for goods or services. Decision making process will consider:

- The 'Life Cycle' costs of the product and/or service to the environment and society
- The impact that our supply chain partners have on the environment and how they achieve continual improvement in reducing that impact
- Support for suppliers who view sustainability and the use of sustainable resources to be important within their activities
- Support for local enterprise growth and economic diversity within the communities where we operate

- Support for suppliers who provide healthy, safe and inclusive workplaces
- Support for suppliers who embrace equality and diversity within the workplace
- Providing encouragement to suppliers who adopt responsible practices in the marketplace and are able to demonstrate effective Business Management
 Systems that meets legislative, regulatory and our own compliance expectations
- The commercial aspects of the proposal alongside the previous points highlighted.

4. Objectives and Targets

Our Environmental aim will be to protect the environment and encourage that all our activities do not create pollution or have a negative impact upon the environment. In striving to achieve this there will be both short term and longer term objectives;

Short Term:

- Increase staff awareness of sustainability issues and our objectives within Social,
 Economic and Environmental aspects and impacts through our staff induction and training programmes
- Embed the use of the recycling schemes for all appropriate waste streams in each of our offices
- Undertake a consolidation of all stored/obsolete/surplus IT equipment, Office furniture, stored archives. Determine most environmentally friendly or socially responsible way to dispose of and rationalize the space used for storage
- Re-introduce and re-inforce the Environmental Sourcing Policy encouraging the adoption of sustainable sourcing into the purchasing side of the organization that incorporates environmental factors including 'life-cycle' considerations
- Set and monitor a set of social, economic and environmental objectives and key performance indicators through our business planning process and report annually on the progress made against each
- Give due consideration in the decision-making processes to the environmental impact of new proposals as well as the social and economic impact
- Encourage the reduction of energy and water consumption by reinforcing the 'switch off and maintain' philosophy
- Encourage the use of recycled materials and the recycling of waste
- Introduce a campaign against the use of single use plastics
- Reduce the use of fossil fuels through encouraging walking, cycling, car share and the use of public transport by staff

Longer Term:

- Establish annual targets to reduce energy and resource consumption within the Organisation by promoting effective and efficient reduction methods consistent with best practice
- Meet and, where possible, adopt best practice regarding all relevant UK, European and International environmental legislative and regulatory requirements and identify staff responsible for developing a register of environmental legislation of relevance to the Organisation and monitoring environmental legislative compliance
- Consider the mitigation of environmental impacts within future tender bids recognizing the potential to reduce the costs and increase the efficiency of delivery
- Where appropriate, use the most resource-efficient technologies and media for communicating and maintaining records of documentation

 Develop a communications policy to share information and best practice with others to help contribute to a better understanding of environmental and sustainable development issues

5. Communication and Review

Environmental objectives and targets are set and reviewed to monitor the effectiveness of the Environmental Management System through meetings of the Senior Management Team supported by an Internal Audit team

6. Availability

This policy is made available to the public on our website and is displayed at all sites.