

# Environmental Management Policy

Independent Boarding and Day School for Boys and Girls  
Royal Hospital School

**June 2017**

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<b>Key author</b>	Estate Manager
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<b>Related Policies</b>	Sustainable Purchasing Policy Health, Safety and Wellbeing Policy Conservation Management Plan Major Incident Plan Environmental Management Plan Carbon Reduction Action Plan

## 1. Environmental Management Policy Statement

The Royal Hospital School recognises that as an organisation we have an impact upon the wider environment through our day to day operations. As individuals we all have a part to play, and that is why one of the School's core aims is to 'cultivate a global outlook and environmental responsibility', which we are to deliver through curriculum education and our individual actions.

We are committed to reducing any negative environmental impact to a minimum through instilling a culture of sustainability and environmental awareness throughout the school, and a positive and active programme of carbon footprint reduction through improved resource efficiency and behaviours.

**Sustainability** - meeting the needs of the present without compromising the ability of future generations to meet their own needs.

**Resource efficiency** - reducing the total environmental impact created by the procurement, use and disposal of goods and services.

### Objectives

- Through continuing evidence of effective behaviours across the School, including procurement, reduced energy consumption and waste recycling, retain the School's Suffolk Low Carbon Charter GOLD accreditation achieved in June 2016. (Evidenced renewal is required every 2 years).
- Demonstrate the School's continuing commitment to reducing our carbon footprint through implementation and review of the Carbon Reduction Action Plan, with a rolling target of 5% reduction per annum.

### Management

- The Bursar is to lead on raising awareness of environmental and sustainability issues among staff and pupils, and is to encourage a whole school approach to resource efficiency in order to achieve our objectives.
- All staff and pupils are to actively support the pupil Eco Committee in its efforts to raise awareness and change behaviours.
- The Bursar is to enable continual professional development and exposure to evolving technologies for staff involved in delivering resource efficiency, and the Deputy Head (Academic) is to encourage academic staff to include sustainability and environmental awareness in their teaching.
- The Estate Manager is to lead on the Carbon Reduction Action Plan, the Environmental Management Plan, and Energy Resource Efficiency. The Bursar is to report on progress to SMT and Governors.

## Policy Aims

The aims of this policy are:

- to articulate the **intent and objectives for environmental management** across the built and rural estate of RHS
- to identify the School's **statutory and regulatory obligations** in respect of environmental management
- to enable the Headmaster and others to carry out their responsibilities for **maintaining a safe and compliant environment** in the School, so far as is reasonably practicable
- to outline **responsibilities**, procedures and associated training requirements
- to outline procedures for **reaction to and reporting of any environmental incidents**

## 2. Environmental Management Responsibilities

General management responsibilities are as stated in the policy statement. It is incumbent upon all pupils and staff at RHS to have an awareness of their environment, to act responsibly, and contribute to the protection and development of it for future generations.

RHS is required to observe environmental legislation and regulations related to the built and rural estate, and also to observe regulations specific to the School environment as detailed in Independent School Standard Regulations (ISSR) and periodically inspected by the Independent School Inspectorate (ISI).

The Estate Manager leads on environmental management, with specific responsibility for:

- conservation of the School estate, both built and rural
- environmental safety and standards, including water treatment and ISSR requirements
- environmental protection, including pollution prevention
- environmental development, including carbon and waste reduction, biodiversity
- awareness, training and influencing behaviours; includes development and observation of associated policies e.g. Sustainable Purchasing
- reaction to and reporting of any environmental incidents

### **3. Conservation of the School Site**

The comprehensive Conservation Management Plan (CMP)<sup>1</sup> covers in detail the historical development of the RHS site, both built and rural. It summarises our statutory obligations towards conservation and the various stakeholders that are involved, including Historic England and Babergh Council for the listed built estate, and Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) for the rural estate.

The CMP acknowledges that development of the School site is required in order for it to evolve and compete as a business, but that such development will be conducted sympathetically and compliantly in appropriate consultation with stakeholders.

The Estate Manager is responsible for conservation matters and for routine consultation with Babergh Council, Historic England and other stakeholders.

Copies of the CMP are held for reference by the Bursar and the Estate Manager

### **4. Environmental Safety and Standards**

RHS is a complex site with a wide variety of potential environmental safety issues. Across the built estate, the following are covered by separate policies and risk assessment:

Health, Safety and Wellbeing

Fire Safety

Asbestos

COSHH

Legionella

Electricity at Work/Code of Practice and Portable Appliance Testing (PAT)

Accessibility

Transport/traffic management

In addition to HSE regulations, ISSR also have to be observed. This includes risk assessments concerning pupil access to potentially hazardous areas e.g. sewage farm.

#### **Water**

RHS abstracts<sup>2</sup>, treats and distributes its own water supply, and the School is subject to the relevant regulations<sup>3</sup> in relation to quality/wholesomeness and safety. The regulating authority is Babergh Council, who are responsible for conducting 5 yearly risk assessments and regular monitoring/testing. The RHS water supply is prone to high iron content as a result of distribution through the ageing cast iron network, and while this is a quality as opposed to a safety issue, the risk assessment requires the School to be vigilant in addressing this issue.

An important element of our environmental responsibility is to ensure that water is not wasted, and reduction in consumption/waste is an ongoing objective as part of our LCC Gold accreditation. While RHS is not subject to drought restrictions that may be imposed by Anglia Water, the School and residents – as part of the local community - should expect to observe such restrictions.

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<sup>1</sup> Published July 2016

<sup>2</sup> Under licence from the Environment Agency.

<sup>3</sup> Private Water Supplies Regulations 2016 as amended.

ISSR 28 relates to provision of water in the School environment. All cold water supplies across RHS are suitable for drinking, however water drinking fountains are specifically labelled as such and additional signage is posted in the entrance to boarding and day houses. In respect of hot water supply, provision to pupils across the School is limited to a maximum temperature of 43° C.

The Deputy Estate Manager is responsible for the day to day management of water supply at RHS, and for contingency/resilience planning in order to maintain business continuity in the event of loss of safe or sufficient supply.

## **Acoustic**

Noise safety arrangements are detailed in the School Health, Safety and Wellbeing Policy.

ISSR 26 requires the School to ensure that acoustic conditions and sound insulation are appropriate; this applies principally but not exclusively to the Music School.

## **Lighting**

Appropriate levels of lighting are to be provided in internal areas to meet the requirements for teaching, sport and other activities therein, and in external areas to provide safety and security.

ISSR 27 relates to lighting requirements.

# **5 Environmental Protection**

## **Wildlife, Flora and Fauna**

As part of the School's aim to 'cultivate a global outlook and environmental responsibility' it is important to protect and sustain the wildlife, flora and fauna across RHS. As well as potential reputational consequences, there are also legal consequences arising from any failure to protect wildlife, e.g. disturbance of nesting birds, destruction of bee nests etc.<sup>4</sup>

In the interests of safety as well as environmental responsibility:

- pest and vermin management is managed by the Estates department in order to ensure targeted and appropriate measures; no weapons are to be used on the RHS estate without the prior permission of the Estate Manager.
- advice should be sought from Estates before conducting any pest control or other activity that might contravene conservation guidelines or legislation.
- dog owners are to strictly observe the relevant signage across the School; there is a zero tolerance policy towards dogs off the lead and failure to pick and bin dog waste,

## **Pollution Prevention**

RHS is subject to pollution prevention regulations<sup>5</sup>, reinforced by being within an AONB, and sited above an ancient water aquifer from which it abstracts its water supply. The CMP also highlights the School's proximity

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<sup>4</sup> The Wildlife and Countryside Act 1981 as amended.

<sup>5</sup> Environmental Protection Act 1990, as amended.

to Holbrook Creek and the Stour Estuary, designated as a Site of Special Scientific Interest (SSSI), and also as a Special Protection Area (SPA) and a Wetland of International Importance (Ramsar)<sup>6</sup> site.

The Deputy Estate Manager is responsible for site pollution risk assessment and maintaining pollution contingency and reaction plans in relation to in-house immediate response/limiting spread and subsequent contractor supported response/recovery operations.

The principal pollution threats for RHS and the surrounding environment potentially arise from:

- oil and fuels
- sewage and waste water
- laundry chemicals
- swim pool chemicals
- other Control of Substances Hazardous to Health (COSHH) items, including paint and pesticides
- waste disposal

## **Oil and Fuels**

Oil is currently the main energy source across RHS, the delivery and storage of which creates a significant potential hazard. In the context of compliance regulations<sup>7</sup> oil includes:

- petrol
- diesel
- biofuels
- kerosene
- vegetable oils
- synthetic oils (normally lubricating oils, e.g. motor oil)
- oils used as solvents
- biodegradable oils (usually lubricating or hydraulic oils)

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<sup>6</sup> The Stour Valley was designated as an SPA and Ramsar site in May 2005 due to its importance as a wetland/waterfowl habitat.

<sup>7</sup> The Control of Pollution (Oil Storage) (England) Regulations 2001 as amended.

- liquid bitumen-based products, e.g. waterproofing or damp proofing products, or coatings for a road surface

The Deputy Estate Manager is responsible for ensuring day to day compliance concerning deliveries, overflow alarms, maintenance of tanks/bunds and pollution prevention/reaction. He is assisted by the Estate Manager in respect of domestic storage tanks, and the Estates Stores Manager in respect of vehicle fuels.

## **Sewage and Waste Water**

RHS operates its own combined sewage and waste water system with consents<sup>8</sup> to discharge that are issued and enforced by the Environment Agency<sup>9</sup>. The overall operation is subject to the relevant regulations<sup>10</sup> to prevent polluted discharge to streams and rivers. The proximity of the School and the sewage plant to Holbrook Creek (part of the Stour Estuary SSSI, SPA and Ramsar) plus the quantity of waste water run-off arising from serious storm events<sup>11</sup>, makes pollution prevention a prescient environmental and reputational issue.

The School also maintains a number of septic tank systems to support more remote locations including the sports pavilions. Discharges of effluent (no matter how clean) to a watercourse is an offence under Section 85 of the Water Resources Act 1991.

The Deputy Estate Manager is responsible for supervising day to day operation of the sewage and waste water system, maintenance and serviceability of the sewage treatment facility, contractor removal and transfer certification of bulk sewage waste, and for ensuring compliance concerning pollution prevention and environment protection.

## **Laundry Chemicals**

The Laundry is a significant user of chemicals, principally in relation to dry cleaning which, because of the need for safe handling of solvents and the potential for environmental damage, is a local authority licenced and regulated activity<sup>12</sup>.

The Operations Manager is responsible for supervising day to day operation of the Laundry, for conducting appropriate risk assessments, and for ensuring day to day compliance concerning pollution prevention and environment protection.

## **Swim Pool Chemicals**

Operation of the swimming pool requires the use of a significant quantity of chemicals that have to be handled, stored and used correctly in order to ensure safety and environmental compliance.

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<sup>8</sup> Consents dated 13 March 2002, 1 x secondary treated sewage effluent, 1 x storm sewage.

<sup>9</sup> Through periodic no-notice tests of effluent discharge.

<sup>10</sup> For England and Wales, the principal water pollution offences are contained in the Environmental Permitting (England and Wales) Regulations 2010 as amended: regulations 38(1) and 12(1).

<sup>11</sup> It is suggested that climate change will make serious storm events more prevalent.

<sup>12</sup> Under the Environmental Permitting (England and Wales) Regulations 2010 as amended, local authorities must regulate certain types of activity such as dry cleaning.

HSE guidance on managing health and safety in swimming pools<sup>13</sup> includes the safe handling, storage, security and use of chemicals.

Filter backwash waters are potentially highly polluting, and their disposal requires careful management in order to prevent environmental damage to Holbrook Creek and the Stour Estuary SSSI, SPA and Ramsar.

The Deputy Estate Manager is responsible for supervising day to day operation of the swimming pool treatment and backwash processes, for conducting appropriate risk assessments, and for ensuring day to day compliance concerning pollution prevention and environment protection as well as safety.

## **COSHH**

A wide variety of COSHH materials are procured and used by various teaching and support departments across the School. The separate COSHH policy lists the registers to be maintained and outlines procedures to be applied across the School in order to maintain safety and environmental protection.

It is the responsibility of the Head/Manager of the procuring teaching or support department to ensure that procedures for storage, registration, handling and disposal are observed in accordance with the COSHH policy, relevant data sheets and compliance regulations<sup>14</sup>.

## **Waste Disposal**

RHS is required to observe business waste management regulations<sup>15</sup>, including waste transfer certification designed to prevent disposal of items that are potentially hazardous to safety or harmful to the environment. Types of waste include:

- general waste destined for landfill or incineration
- recycling
- electrical and electronic equipment waste (WEEE)
- specialist skips eg metal, wood, plasterboard
- Catering food waste
- sewage farm, septic tank and grease trap waste
- hazardous waste, including medical, radioactive etc.

The School's commitment to carbon reduction involves minimising at every opportunity waste going to landfill, and maximising re-use or recycling. Use of the secured waste tip area between the sewage farm and creek is managed by Estates and is limited to bio-degradable items.

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<sup>13</sup> HSG179 (Third edition, published 2003).

<sup>14</sup> Control of Substances Hazardous to Health (COSHH) Regulations 2002 as amended.

<sup>15</sup> Waste (England and Wales) Regulations 2011 as amended.

The separate Sustainable Purchasing Policy places responsibility on teaching and support departments that procure items to consider both packaging and end-of-life waste disposal, and make appropriate arrangements – ideally suppliers should arrange disposal as part of the procurement/contract agreement, as identified in the Sustainable Purchasing Policy.

Styrofoam can't be recycled, and its procurement for catering or any other purposes is prohibited in the Sustainable Purchasing Policy. Careful consideration is to be given to the litter and waste consequences of procuring/using disposable items such as plates and cutlery.

Residential waste disposal is the responsibility of individual residence licence holders through utilisation of council collections and household waste centres; residential waste is not to be disposed of in School/Estates waste facilities without prior permission. Separate arrangements apply for charity clothing, paper and glass skips.

The Assistant to the Estate Manager is responsible for co-ordinating day to day School waste management and for ensuring appropriate compliance.

## **6. Environmental Development.**

### **Intent**

The overall intent is to continually improve the sustainability, resource efficiency and diversity of the RHS estate while reducing the School's carbon footprint and environmental impact.

Every pupil and member of staff should aspire to leave RHS in better environmental shape than they found it to benefit future generations.

### **Carbon and Energy**

Every opportunity should be taken to include cleaner and more efficient energy technologies in development and refurbishment projects across the School. Such opportunities might include:

- procuring equipment with improved resource efficiency (less energy, water, maintenance etc.) and reduced environmental impact
- LED lighting
- renewable energy sources<sup>16</sup>

The School has no separate legal identity from Greenwich Hospital, which as a Crown Charity is exempt from the provision of the Energy Savings Opportunity Scheme (ESOS), a mandatory government energy assessment scheme designed to encourage the implementation of energy efficiency technology.

RHS has already taken many of the steps envisaged within ESOS such as insulation, metering etc., and the School's ongoing progress will be reflected in maintaining our Low Carbon Charter Gold accreditation, the achievement of which requires evidence<sup>17</sup> of continuous improvement.

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<sup>16</sup> See Renewable Energy Strategy Report 12 September 2012, incorporating SABRE Review 03 July 2012.

<sup>17</sup> To include maintenance and review of the Carbon Reduction Action Plan (CRAP) and the Environmental Management Plan (EMP) in order to monitor and report progress to SMT and Governors as well as Suffolk Low Carbon Charter.

## **Wildlife, Flora and Fauna**

Improving the diversity of the estate is to be actively pursued, ideally combining the efforts of Estates with pupils, teaching departments and external stakeholders.<sup>18</sup> Opportunities for development include:

- habitat development to support targeted species such as turtle dove, hedgehog, brown hare
- provision and monitoring of nest boxes where a deficiency in nest sites is identified and ongoing maintenance is practical
- manage grass areas to maintain or increase biodiversity, e.g. wildflower/hay meadows to support bees, butterflies etc.
- tree and hedgerow management, maintenance and planting

## **7. Awareness, training and influencing behaviours**

‘As individuals we all have a part to play, and that is why one of the School’s core aims is to ‘cultivate a global outlook and environmental responsibility’, which we are to deliver through ‘curriculum education and our individual actions’.

Execution of delivery is to be reinforced through:

- notice board and intranet posting of Headmaster’s Policy Statement
- awareness of and access to this policy, plus the associated Sustainable Purchasing Policy
- briefings to new staff on arrival and through updates during INSET, Support Staff meetings
- pupil assemblies, curriculum content and the Eco Committee
- energy metering and circulation of quarterly reports
- exposure of Estates staff to evolving compliance and new technologies, techniques and resources through training and attendance at relevant conferences and exhibitions
- maintenance and monitoring of the CRAP and EMP to evidence LCC Gold
- regular reports to SMT and Governors

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<sup>18</sup> Eg RSPB, Suffolk Wildlife Trust.

## **8. Reaction to, and reporting of, environmental incidents**

Estates or the Estates 24/7 duty staff are to be alerted at the earliest opportunity to any pollution or other environmental incident. In the event of a serious incident, there is to be no delay in contacting the emergency services, Environment Agency, etc. and triggering the School Disaster Plan.

The Deputy Estate Manager is responsible for:

- contingency planning for pollution, breakdown of safe water supply etc.
- ensuring pollution spill/response kit is maintained and available in and out of working hours
- maintaining and issuing instructions/contact numbers for environmental emergency response to Estates 24/7, Reception, Disaster Plan box etc.
- contract arrangements for pollution response and clean-up, back-up water supply etc.

### **Associated Policies/Documents:**

Sustainable Purchasing Policy  
Health, Safety and Wellbeing Policy  
Conservation Management Plan  
Major Incident Plan  
Environmental Management Plan  
Carbon Reduction Action Plan