

R&M POLICY · ENVIRONMENT AND SOCIAL VALUE

Environmental Training Plan

R&M Property Group Ltd

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Approved by	Thom McKenna, Director
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1. Purpose

This Environmental Training Plan sets out how R&M Property Group Ltd (R&M) makes sure that everyone who works on its construction projects, including employees, subcontractors and other workers, has the skills, knowledge and information needed to carry out their duties without harming the environment. It supports the Environmental Management Policy (Rev 2.0) and the Environmental Implementation Plan (Rev 1.0).

The plan covers training needs by role, site induction, toolbox talks, formal qualifications, refresher training, how changes in the law and good practice are passed on, how subcontractor competence is checked, and how training is recorded and its effectiveness reviewed.

2. Responsibilities

- **Thom McKenna (Chair & CEO):** approves this plan and makes sure training is resourced and funded.
- **Jon Scurr (Director of Operations):** identifies environmental training needs for site roles, makes sure site managers deliver inductions and toolbox talks, and checks subcontractor competence.
- **Phillip Hollingworth (H&S Adviser, Spectra Safety):** maintains the training matrix and records, tracks refresher dates, prepares legal update briefings and toolbox talk material.
- **Spectre Safety (external health, safety and environmental adviser):** carries out monthly site audits on every live R&M project. At each audit, Spectre Safety reviews the training records, induction records and toolbox talk attendance for that site, identifies any gaps or certificates nearing expiry, and arranges the required training in advance so that no one's qualifications lapse.
- **Site and Project Managers:** deliver site inductions, toolbox talks and daily briefings, and keep attendance records.
- **Subcontractors:** make sure their operatives hold the required cards and qualifications, attend R&M inductions and toolbox talks, and provide training records on request.

3. Training Needs by Role

Environmental training needs are identified for each role when a person joins R&M, when their role changes, and at their annual review. The minimum requirements are:

Role	Environmental training required	Refresher
Directors and senior managers	Environmental legislation and director responsibilities briefing; Environmental Management Policy and Implementation Plan; SMSTS (Site Management Safety Training Scheme), which includes environmental modules	Annual legal update briefing; SMSTS refresher every 5 years

Role	Environmental training required	Refresher
Project and site managers	SMSTS; CITB Site Environmental Awareness Training Scheme (SEATS) or equivalent; R&M environmental arrangements (waste Duty of Care, spill response, incident and complaint procedures, site waste management plans)	SMSTS refresher every 5 years; SEATS or equivalent every 5 years; annual legal update briefing
Supervisors and foremen	SSSTS (Site Supervisor Safety Training Scheme), which includes environmental modules; spill response; waste segregation	SSSTS refresher every 5 years; toolbox talks monthly
Operatives (direct and subcontract)	Valid CSCS card (or equivalent); R&M site induction including environmental content; toolbox talks	Toolbox talks monthly; re-induction if away from site for more than 3 months or if site risks change
Plant operators and fuel handlers	CPCS / NPORS card as required; refuelling, spill prevention and spill kit use	Toolbox talk before refuelling duties start and at least every 6 months
Office staff and design / procurement roles	Environmental Management Policy; sustainable procurement and specification (responsible sourcing, embodied carbon, waste designed out)	Annual briefing
Visitors	Short visitor induction covering site rules, drainage and reporting	Each visit

4. Site Induction

No one starts work on an R&M site without an R&M site induction. The environmental content includes:

- R&M's Environmental Management Policy and the site's key environmental risks
- Location of drains and watercourses, and how they are protected
- Waste segregation, skip locations and the ban on burning waste
- Fuel and chemical storage, and the location and use of spill kits
- Noise, dust and working hour restrictions, and consideration for neighbours
- Protected trees, habitats or species on or near the site
- Energy saving (switching off plant, cabins and lighting)
- How to report an environmental incident, near miss or complaint

Each person signs the induction record to confirm they have understood it. The site manager checks and records their CSCS card or other qualifications at induction.

5. Toolbox Talk Programme

Environmental toolbox talks are delivered at least monthly on every site, following the rolling 12-month programme below. Additional talks are given before high-risk activities (for example concrete pours, excavations near drains, or site clearance) and after any environmental incident or near miss.

Month	Topic
1	Environmental policy and your responsibilities on site
2	Waste segregation and the waste hierarchy
3	Spill prevention and spill kit use (with practical drill)
4	Protecting drains and watercourses; silt and concrete wash-out
5	Fuel and oil storage and refuelling
6	Dust control and air quality
7	Noise and vibration; working hours and neighbours
8	Nesting birds, bats and protected species
9	Material storage, care and returns
10	Energy saving on site: plant idling, generators and cabins
11	Hazardous waste and COSHH substances
12	Environmental incidents and complaints: reporting and lessons learned

Attendance is recorded on the Toolbox Talk Attendance Record (Appendix B), signed by each attendee.

6. Refresher Training and Keeping Up to Date

R&M keeps its workforce up to date with legal requirements and good environmental practice through a programme of refresher training:

- **Formal qualifications:** SMSTS, SSSTS, SEATS (or equivalent) and CSCS / CPCS / NPORS cards are refreshed before they expire. The Compliance Officer tracks expiry dates on the training matrix and books refreshers at least 3 months in advance.
- **Monthly training review:** R&M has engaged Spectre Safety to review training monthly as part of their monthly site audits. Spectre Safety checks the training matrix and site records against the requirements in Section 3, flags upcoming expiry dates and books refresher training in advance, and reports its findings to the Director of Operations and the Compliance Officer.
- **Annual legal update briefing:** the Compliance Officer prepares an annual briefing for directors and managers on changes to environmental law, regulations and guidance (for example waste, water, biodiversity net gain and energy requirements), using information from professional advisers, Constructionline, CITB, the Environment Agency and industry bodies.
- **Interim updates:** significant changes in law or client requirements are briefed to managers within one month, and to site teams through toolbox talks.
- **Lessons learned:** findings from incident investigations, complaints, site inspections and audits are shared with all sites through toolbox talks.
- **Continuing professional development:** managers are encouraged to attend industry events and CPD on sustainability, carbon reduction and modern methods of construction.

7. Subcontractor Competence

Before appointment, subcontractors are assessed under R&M's Sub-Contractor Selection and Monitoring Policy, including their environmental policy, training arrangements and relevant

qualifications. On site, the site manager checks cards and qualifications at induction. Subcontractors are required to attend R&M toolbox talks, and operatives who do not follow environmental rules are retrained or removed from site.

8. Records and Effectiveness

- **Training matrix:** the Compliance Officer maintains a training matrix (Appendix A) showing each person's role, training completed, certificate numbers and refresher due dates.
- **Records:** induction records, toolbox talk attendance records and training certificates are kept for at least 6 years.
- **Effectiveness:** the Director of Operations checks that training is effective through site inspections, Spectre Safety's monthly site audit reports, the Weekly Site Environmental Inspection Checklist, and the number and causes of incidents, near misses and complaints. Where gaps are found, further training is given.
- **Review:** this plan is reviewed annually by the Chair & CEO and the Compliance Officer as part of the environmental management review.

Document Control

Rev	Date	Description	Approved by
1.0	28 September 2026	First issue	T McKenna, Chair & CEO

Approved and Signed

Name: Thom McKenna

Position: Chair & Chief Executive Officer, R&M Property Group Ltd

Date: 28 September 2026

Appendix A – Environmental Training Matrix

Name	Role	CSCS / card (expiry)	SMSTS / SSSTS (expiry)	SEATS or equiv. (date)	Induction (date)	Last env. toolbox talk	Next refresher due

Appendix B - Toolbox Talk Attendance Record

Field	Details
Project / site	
Date	
Topic	
Delivered by	
Key points covered	

Name (print)	Company	CSCS no.	Signature